

PLANNING STATEMENT

LAND AT BARWICK ROAD, DOVER, KENT

Redevelopment of the existing site to provide residential development comprising no. 137 dwellings (comprising no. 73 houses and 64 apartments) with relocation of the existing vehicular access and creation of 1 x additional vehicular access from Barwick Road, alongside associated parking, landscaping and infrastructure

On Behalf of Oliver Davis Homes



Lee Evans Planning Ref: 9126

September 2022

Full Planning Application
at
Land at Barwick Road, Dover, Kent

<i>Client</i>	<i>Oliver Davis Homes</i>
<i>Determining Authority</i>	<i>Dover District Council</i>
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<i>Date</i>	<i>September 2022</i>
<i>Status</i>	<i>FINAL</i>

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1. INTRODUCTION

1.1 This Planning Statement is submitted pursuant to an application for full planning permission made on behalf of Oliver Davis Homes (hereafter, ‘the Applicant’).

1.2 Oliver Davis Homes creates quality homes across the South East, with an expanding track record of delivery since its formation. Based in Kent, the Applicant specialises in the delivery of complex residential schemes with a keen focus on bringing high quality new homes to the region. Oliver Davis Homes specialises on large scale redevelopment and conversion schemes – as noted in consented schemes across Kent, including at Ashford and Maidstone – as well as new modular build developments. Drawing on previous experiences elsewhere across Kent, the proposed development comprises the redevelopment of the existing vacant light-industrial site to provide residential development. The key focus for Oliver Davis Homes is delivery of high-quality developments for the rental market. Build-To-Rent schemes provide a guarantee of a high level of finish and ongoing maintenance of the completed schemes in perpetuity. As a result, the local authority can take comfort in the fact that this isn’t just a well-designed high quality scheme, but will remain looking as good as it does once delivered for many years to come whilst providing quality family homes in the District.

1.3 The proposed description of development is listed as follows:

“Redevelopment of the existing site to provide residential development comprising no. 137 dwellings (comprising no. 73 houses and 64 apartments) with relocation of the existing vehicular access and creation of 1 x additional vehicular access from Barwick Road, alongside associated parking, landscaping and infrastructure”

1.4 It is of central importance to note that the Site benefits from an existing allocation for residential development under the existing, adopted Local

Development Framework – specifically Policy LA8 ‘Land in Coombe Valley’ of the Land Allocations Local Plan (2015) which allocates a number of parcels in the valley – including the Barwick Road site – for residential development of up to 450 dwellings. The Site further benefits from a number of historic (lapsed) planning permissions for residential development, as explored elsewhere in this Statement.

1.5 This Statement makes an assessment of the proposed development against the development plan for Dover District Council, with due regard to relevant material considerations including the National Planning Policy Framework (NPPF), planning history, and the status of the emerging Local Plan for the District.

1.6 Whilst a Regulation 18 Draft Local Plan has been previously consulted upon, it is relevant that the emerging Local Plan with policies intended to cover the period up to 2040 is due to be consulted on further during Q4 2022 (Regulation 19 – Submission Draft). The Local Development Scheme (LDS) for the District (Dated September 2022) confirms submission of the Plan for Examination in Q1/2 2023, and a target adoption in 2024. The progress of the Plan is noted, and its contents are considered to carry increasing weight relative to the stage of plan preparation reached. This is particularly salient given the proposed allocation of the application site as a residential development which has since been updated by way of publication of the Regulation 19 Local Plan, which identifies the Site as SAP9 – Barwick Road Industrial Estate – for development of circa 150 dwellings effectively reinforcing the long-standing in-principle support for residential development at this Site.

1.7 The case is made throughout this Statement that the Site continues to represent an opportunity for a logical location for residential development within the built confines of Dover, interfacing with existing residential development on Barwick Road. The proposed development would create a distinguishable high quality development providing new homes which are

sensitively integrated into the community in a sustainable location within the defined urban area for Dover.

1.8 The proposals as demonstrated across the submission package demonstrate strong urban design and place-making principles, creating spaces for informal recreation with safe and liveable streets fully recognising the Site's landscape context and setting.

1.9 The proposed development has been the subject of pre-application engagement with Dover District Council exploring two alternate options, as well as a level of public consultation. Dover Town Council has been approached prior to submission of this application, and the Applicant will present the scheme to councillors in Autumn 2022.

1.10 Against this planning context, this Statement focuses on the overarching principle of development in this location whilst also considering site-specific technical matters pertinent in assessment of the proposal.

1.11 The application comprises the following documents:

- The application form and relevant ownership certificates
- This Planning Statement
- Site Location and Block Plans
- Existing plans and elevations
- Proposed Plans including masterplan layout, floor plans and elevations
- Design and Access Statement
- Transport Assessment
- Travel Plan
- Landscape Visual Appraisal
- Hard and Soft Landscape Strategy

- Phase 1 Preliminary Ecological Survey Report
- Biodiversity Net Gain Report
- Flood Risk Assessment and Drainage Strategy
- Phase 1 Ground Investigation Report

1.12 This Statement is structured around the following chapters:

- **Section 2** outlines the Site and its planning context
- **Section 3** of this Statement provides an overview of relevant planning history, including an overview of the extensive pre application engagement processes carried out to inform the development submitted for assessment.
- **Section 4** provides details of the proposed development.
- **Section 5** identifies the relevant planning policy considerations.
- **Section 6** discusses the relevant issues alongside those identified policy provisions.
- **Section 7** addresses the planning balance and reaches a conclusion on the proposed development

1.13 This Statement concludes that the proposed development bringing forward a deliverable and sensitively designed form of residential development in this location would duly satisfy relevant planning policies for the District, per the adopted Local Development Framework which allocates the Site for residential use. The emerging Site Allocation SAP1 also supports the in-principle development of this site for up to 220 dwellings in this location, albeit the precise wording of this allocation is subject to change under Regulation 19 Local Plan consultation documentation.

- 1.14 Technical matters of highways, ecology, landscape, ground conditions, and drainage have also been assessed in the compilation of this application and its supporting material. These specialist inputs have duly informed the development subject of this assessment and there are considered to be objectionable technical matters arising from this scheme. In this manner, the proposed development would provide for a promptly deliverable form of complementary development in this location.
- 1.15 Overall, it is asserted that the proposed development represents a sustainable form of development consistent with the adopted development plan and – prior to the adoption of the emerging local plan – other relevant material considerations including planning history. It is strongly considered that the proposed development is one which would promptly deliver a high quality development in this location in compliance with the aspirations for sustainable development within the District.
- 1.16 It is respectfully requested that planning permission be granted.

2. SITE DESCRIPTION AND PLANNING CONTEXT

- 2.1 The Site comprises an existing brownfield site well-related to adjacent, largely two-storey residential development, and falls within the defined 'urban confines' for Dover (**Figure 1**). It includes for a redundant industrial / commercial building which has fallen into disrepair. The Site benefits from an existing access to Barwick Road.
- 2.2 To the north of the Site there is existing residential development fronting Barwick Road, with St Radigunds Road beyond this to the rear. The west of the Site interfaces with 'Cactus Graphics' which is an existing operational commercial light industrial use. The Red Line Boundary for the Site runs directly against this boundary.
- 2.3 Built form at the 'Cactus Graphics' site is generally consolidated to the north within an existing range of buildings; it is largely open elsewhere within the Site. St. Radigunds Community Centre falls to east of the Site and includes a volume of incidental open and play-spaces. Poulton Close runs to the south of the Site and is largely characterised by existing commercial and light-industrial business uses. Buildings are generally of a light-industrial vernacular; there is no residential development to the immediate south of the Site.
- 2.4 Coombe Valley comprises a mix of housing in terms of size, period and tenure and is characterised by back to back terraces dating from the Victorian period, whilst further up the valley are newer semi-detached and terraced properties with narrow streets. A large proportion of the properties are social rented. It is the District's most deprived ward and part of the ward falls within the country's top 10% of most deprived wards. The area has been identified as the Coombe Valley Character Area for the purpose of setting urban design principles.

- 2.5 Topography within the site rises due west towards the Kent Downs AONB designation which begins at the western edge of the Site boundary.
- 2.6 In its current configuration, parts of the site are overgrown with scrub and dense low level vegetation. Beyond the Site's southern boundary there is an existing Local Nature Reserve.
- 2.7 As below, the Site benefits from an existing (and proposed) allocation for residential development under the current and emerging Local Plan for the District.

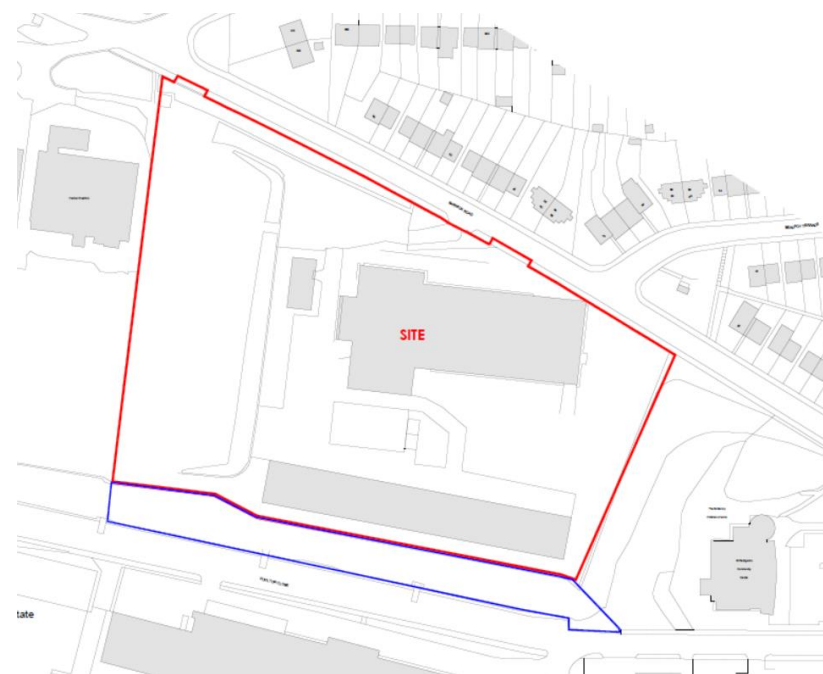


Figure 1. Site location plan (red line), identifying additional ownership beyond the site's demise (blue line)

PLANNING POLICY DESIGNATIONS

- 2.8 The Site falls within the urban confines for Dover, which is a focus for growth in the District (**Figure 2**).
- 2.9 It is relevant that the Site benefits from allocation as part of the wider strategic allocation for residential development in the Coombe Valley under Policy LA8 of the adopted Land Allocations Local Plan for circa 450 dwellings. This allocation has to date delivered only in part, largely on parcels at the lower end of Coombe Valley Road. It appears that little of this allocation has come forward to date.
- 2.10 It is also relevant that the emerging Local Plan (currently published in Regulation 18 draft format) seeks to carry over this allocation. It identifies the Site under draft Policy SAP1 (ref. DOV022E – Land at Coombe Valley) for an estimated capacity of 220 dwellings to be delivered over the period 2025-2029, subject to specific transport and contamination assessment (**Figure 3**). It is noted that the published Regulation 19 Draft Local Plan continues to allocate the Site for residential development, with capacity of circa 150 dwellings. The Regulation 19 Draft Local Plan will be considered at Cabinet in October, before a target public consultation throughout October and November 2023. It is understood that the Regulation 19 Plan will be submitted for Examination in Public in Q1/2 2023, with a target adoption in early 2024.
- 2.11 In any event, there is clear in principle support under the adopted Local Plan for the residential development of the Site – and a clear direction of travel under the emerging Local Plan which retains the LPA's now longstanding support for the residential development of this Site.
- 2.12 It is also important to note that the Site itself forms part of the boundary to the designated Kent Downs Area of Outstanding Natural Beauty (AONB) which is afforded a high level of protection. T

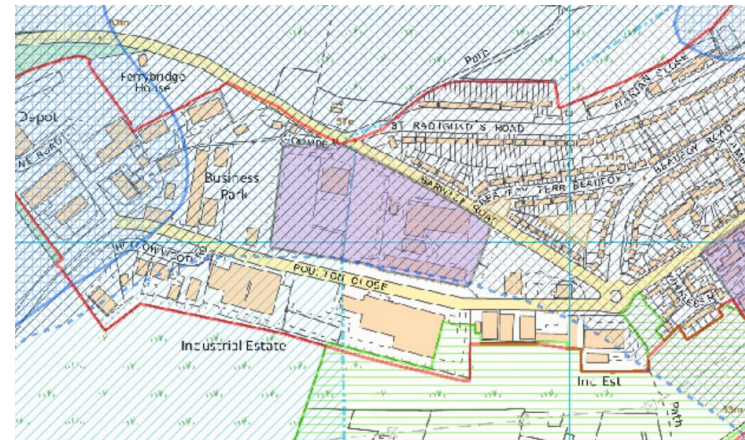


Figure 2. Site location relative to adopted Local Plan policy designations (site 'washed over' in purple, denoting allocation for development).



Figure 3. Site location relative to emerging (Regulation 18) Local Plan policy designations. Site 'washed over' in purple shading denoting allocation.

3. PLANNING HISTORY & PRE-APPLICATION ENGAGEMENT

PLANNING HISTORY

- 3.1 Relevant recent planning history for the Site is limited, though it is noted that the Site benefits from a history of consents in respect of the delivery of residential dwellings in this location which has duly informed the continued allocation of the site for development.
- 3.2 Specifically there is no relevant planning history in the last 10 years. The application site and additional adjacent land was subject to outline consent for 220 dwellings in 2008 and 2012 (**Figure 4**). No reserved matters applications were submitted following these consents and the scheme was not commenced.
- 07/01095 - Outline application for 220 dwellings including proposed vehicle access and associated works (existing buildings to be demolished)
 - 12/00111 - Replace extant outline planning permission (DOV/07/01095) for up to 220 dwellings, including proposed vehicle access and associated works (existing buildings to be demolished), in order to extend the time limit for implementation
- 3.3 There is no extant permission in place, although due regard is had to earlier development proposals at the Site which grappled with similar matters.



Figure 4. Extract of approved indicative masterplan pursuant to the consented schemes (07/01095 and 12/00111)

PRE-APPLICATION ENGAGEMENT

- 3.4 In preparing this application, the Applicant has undertaken pre-application engagement as outlined below.
- 3.5 In line with Paragraph 39 of the Framework, the Applicant has sought to front load discussions with the LPA in recognition that *“early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties”*.
- 3.6 Specifically, the Applicant has pursued the following pre-application engagement:
- Pre-application enquiry submission to Dover District Council;
 - Notification of proposed development to local residents, by way of site notices and letter drop;
 - Notification of proposed development to Dover Town Council

Pre-application enquiry submission to Dover District Council

- 3.7 Pre-application advice was sought from Dover District Council in June 2022, whilst a meeting with Officers was held in July 2022. A detailed pre-application pack was provided to officers including initial assessment of the Site’s context and a number of technical matters.
- 3.8 It is noted that the original pre-application scheme centred on the delivery of 102 residential units. As part of the pre-application process, an alternative scheme identifying circa 140 units was presented to officers in efforts to more closely reflect the LPA’s proposed development yield for the Site based on the adopted and emerging planning policy position (at that point, circa 220 units across a wider site area). At the request of the Applicant, the alternative scheme for circa 140 dwellings was then the focus of the advice received.

- 3.9 Discussions with the LPA focussed primarily on matters of the overarching principle of development in this location, alongside matters of design, landscape, and highways. Detailed comments were provided in respect of ecology, trees, and flood risk.
- 3.10 A written response was received from the LPA on 6 September 2022. This response confirmed that:
- The Site is the subject of an existing housing allocation through Policy LA8, and that this allocation remains at the time of writing. The LPA confirmed that the allocation applies to multiple land parcels comprising ‘Land in the Coombe Valley’ for 450 dwellings;
 - The Site benefits from proposed allocation for an estimated 220 dwellings (under the Regulation 18 Draft Plan policy SAP1), albeit that a reduced quantum of development may be appropriate in securing a suitably balanced and quality scheme;
 - The LPA supports the development of the site for residential development within a suitably sustainable location within the urban confines of Dover. The proposal is also supported by the NPPF which seeks to focus the location of new housing development within sustainable locations;
 - There is inter-visibility to/from the AONB and any future scheme will need to be sensitive in providing a compatible and high quality development which responds and integrates with this sensitive environment;
 - A revised layout should incorporate a street frontage to Barwick Road, improved pedestrian connectivity within the site and beyond, greater variation in roof types, and flat blocks of alternative design and forms;
 - A revised layout should consider the topography of the site and related storey heights, with the ground level to the west of the site containing a maximum of 2 storey heights, which is likely to

overcome concerns regarding height on the highest area of the Site; and;

- That any future scheme will need to be informed by and sensitively designed in response to the land levels of the site, and its relationship with the adjacent land levels, built environment and wider surrounding environment, particularly the adjacent AONB. Existing and proposed section plans including the adjacent land levels and built development, 3D visuals and the landscape visual impact assessment will be key to the assessment of any future application. The future scheme should provide an appropriate mix of housing size and types, a balanced and sufficient provision of parking and ensure that all relevant considerations and associated reports and information required are included.

- 3.11 It is noted that a number of detailed design comments were provided in the LPA's written pre-application response, and these are addressed the supporting Design and Access Statement and plans which respond accordingly.
- 3.12 It is noted in Section 6 of this Statement that the draft Local Plan has since progressed and the weight afforded to it is considered to be greater owing to its continued passage towards the Examination in Public process. Whilst only limited weight remains in respect of the emerging provisions, it is nonetheless clear that the LPA's policy position continues to advocate strongly for the residential delivery of the application site. Specific commentary is provided later in this Statement, though it should be noted at this stage that the Regulation 19 Draft Local Plan now seeks circa 150 dwellings in this location, rather than the 220 units previously noted in the Regulation 18 Draft.
- 3.13 It is highly relevant that, at the point of a planning decision, the Local Plan is likely to have been adopted by the LPA subject to any modifications sought by the Inspector.

3.14 On matters of landscape, drainage, ecology, and transport the written response confirmed that further detailed assessment would be required to support the development of a scheme.

3.15 Such information has been provided as part of this application, duly informing the details of the proposed scheme.

Notification of Proposed Development to Local Residents, by way of site notices, letter drop, and consultation survey

3.16 Following receipt of pre-application advice from Dover District Council, the Applicant notified local residents – specifically those on Barwick Road in immediate proximity to the Site – of the proposed development.

3.17 A letter was prepared and delivered to local residents to identify the scheme at high level, and provide headline figures relating to the proposed development including a working draft description of development and brief summary of the site's planning history (**Figure 5**). A red line plan, draft site layout, and two indicative elevations were also provided.

3.18 The same information was displayed on the Site's boundary in two locations on Barwick Road; one on the site entrance, and one adjacent to the existing bus stop at the junction with St Radigunds Road (**Figure 7**). The same information was further circulated to St Radigunds Community Centre which adjoins the Site's eastern boundary and may have a wider catchment of interested parties.

3.19 In each case, a link to a consultation survey was provided (**Figure 6**). Contact details for Lee Evans Partnership were provided for further comments and queries.

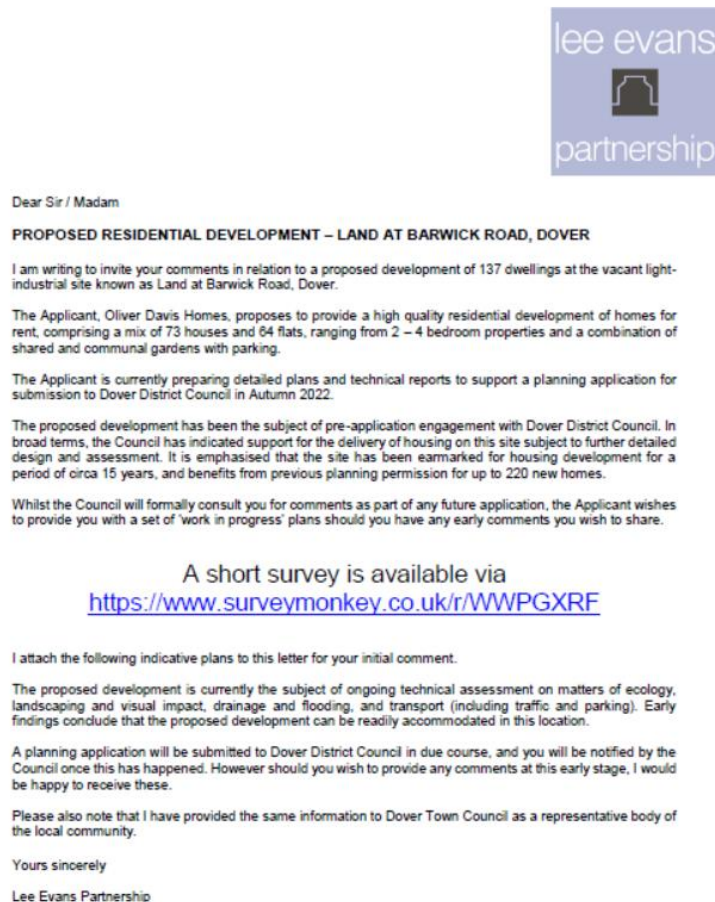


Figure 5. Extract of Consultation Letter delivered to local residents.

Proposed Residential Development at Barwick Road, Dover

Public Consultation Survey

We invite your views on 'work in progress' plans which will be refined to support a planning application for residential development at the Site. Your feedback will be considered in the refinement of the plans supporting an application in Autumn 2022.

Further comments - including a request for 'work in progress' plans if not already received - may be submitted to planning@lee-evans.co.uk

1. Do you support the redevelopment of this vacant site, bringing it back to use for residential-led development? Why / Why not?

2. Notwithstanding your answer to Q1, when considering the masterplan do you agree that these should be the priorities for the design approach? Please tick all relevant responses.

- ☐ Sustainability
- ☐ Open space / recreation space
- ☐ Sense of community (as encouraged by layout and housing mix)
- ☐ Transport (reducing congestion and car use, encouraging cycle and pedestrian links)
- ☐ Landscape and visual impact(s)
- ☐ Design quality
- ☐ Biodiversity enhancement(s)
- ☐ Varied housing types (flats and houses; mix of dwelling sizes)
- ☐ Other (please specify)

☐ None of the above

Figure 6. An extract of the consultation survey provided.



Figure 7. Site Notices in place advertising the proposed development and a link to a consultation survey, and further details of the Applicant's planning agent.

Notification of Proposed Development to Dover Town Council

- 3.20 Alongside the above, a letter was sent to Dover Town Council inviting comment on the proposed development draft scheme, and offering a meeting to councillors to present the emerging plans.
- 3.21 At the time of writing, it has been agreed that the Applicant will present the scheme in its most recent guise to Dover Town Council at their next available Planning Committee meeting in Autumn 2022.

4. PROPOSED DEVELOPMENT

4.1 The proposed development scheme comprises the redevelopment of the existing site to provide residential development of 137 dwellings (comprising no. 73 house and 64 apartments) with relocation of the existing vehicular access and creation of 1 x additional vehicular access from Barwick Road, alongside associated parking, landscaping and infrastructure.

4.2 A full description of the proposed development is articulated throughout the Design and Access Statement which accompanies this submission, and across the various plans and drawings which comprise this application.

PROPOSED DESIGN PARAMETERS

4.3 The proposed site layout respects the three 'zones' as outlined in the emerging draft allocation with residential development contained to the south extent of the site (**Figure 8**).

4.4 The landscape-led design of the layout and the scale of development has been informed by the Landscape Visual Appraisal provided by HillWood&Co, which accompanies this submission. This reflects upon the Site's location within the defined settlement confines for Dover, albeit adjacent to the Kent Downs AONB at the edge of the built up settlement. In accordance with the findings of the LVA and principles of good urban design, a number of design principles have been adopted through this emerging layout, which include:

- locating development sensitively within the site, relative to challenging topographic features and site levels;

- a sympathetic layout and appearance of development, combining mixed materiality, roof forms, storey heights and surfacing;
- permeability in and through the Site, relative to existing site opportunities and constraints;
- a clear frontage to Barwick Road, addressing the existing street scene;
- the retention of existing key boundary vegetation;
- the reinforcement of vegetated character with new planting; and
- promotion biodiversity net gain within the Applicant's ownership where possible.

4.5 It is considered that by adopting this sensitive approach, the proposed development can be integrated into the landscape and visual environment of the Kent Downs. The hard and soft landscaping strategies for the Site's development accompany this submission and should be referred to in full in assessing the relationship of this allocated residential site with the wider landscape setting.



Figure 8. Proposed Masterplan Layout.

- 4.6 The masterplan proposes a variety of different house type designs, providing a range of sizes catering for the needs of different people. Dwellings sizes range from 2 bed – 4 bed dwellings, across flats and houses.
- 4.7 The proposed Schedule of Accommodation is outlined as follows:

SCHEDULE OF ACCOMMODATION	
APARTMENTS	
SUBTOTAL (FOR APARTMENTS)	64 UNITS
3 Bedroom Houses - 2 storey	20
4 Bedroom Houses - 3 storey	53
SUBTOTAL (FOR HOUSES)	73 UNITS
TOTAL	137 UNITS

Figure 9. Schedule of Accommodation

- 4.8 The proposed storey heights across the site vary from 2-4 storeys, the tallest storey buildings, the apartments, having flat roofs. The unit mix will comprise of 2 to 3 storey housing units; and 3 to 4 storey bespoke apartment blocks. The storey heights are varied to reduce the visual impact of the built form as visible from the AONB as well as the adjacent houses to the north of the site. The varying storey heights are dictated by the change of levels across the site. The flats are all flat roof form, and the houses are varied traditional hipped and pitched roof forms. The flat roof forms (the majority being greens roofs) allow for an increase in Biodiversity across the site and reduced visual impact of the apartments.
- 4.9 The internal layouts are designed to meet National Minimum Standards and have considered market preference and modern ways of living. The proposed

scheme ensures there is a wide range of choice through a varied housing typology including flats and houses. This is particularly relevant given the long term investment of the Applicant in the Site, given that it will reflect a ‘Build to Rent’ model of development, wherein the Applicant hopes that tenants will have the confidence to set up home within this high quality built environment.

- 4.10 The proposed design is based largely around a modular method of construction off-site, with the flatted blocks being the only dwellings focused on traditional build on-site. Housing types are explored in detail in the supporting Design and Access Statement.
- 4.11 The proposed materials palette includes:
 - Buff Red Brick
 - Red Roof Tiling
 - Herringbone Brick Patterning
 - Vertical Brick Banding
 - Red multi-stock brick
 - Dark grey roof tiling
 - Trellis walls
 - Green roofing
 - Vertical boarding
- 4.12 The site is accessible directly off Barwick Road. The existing main site access is to be relocated to the east of the existing and a second vehicular access is proposed to the north west.
- 4.13 The proposed development incorporates parking on plot – either in garages, car ports, or driveways. All parking areas are located in close proximity to dwellings for ease of access. Parking has been directed off the Barwick Road frontage via the utilisation of a combination of frontage parking and parking courts. Under-croft parking has also been proposed to F1, F2, & F3 to allow for the reduction of some on street parking. A total of 203 x unit parking

spaces have been provided. (circa 1.5:1 parking: unit ratio). 30 Visitors spaces have also been provided amongst within the bays and courts provided.

- 4.14 Additionally, adequate provision for cycle storage is made for all properties to encourage the use of alternative modes of transport to the car.
- 4.15 A series of pedestrian routes are proposed in line with received pre-application guidance, reflecting both adopted and emerging policy aspirations for the Site. A number of pedestrian routes are proposed throughout the Site, including the potential for access north and east of the Site to Barwick Road and adjoining development, including St Radigunds Community Centre. A turning head is proposed to the western extent of the Site, affording the potential for connectivity to the remainder of this allocated site should this part of the allocation later become available for development.
- 4.16 Provision for refuse storage has been made on plot. Homes have been designed with adequate storage space to encourage recycling and composting to minimise waste. All roads have been designed to accommodate refuse collection vehicles. The refuse collection point for each of the apartments is located internally for F1, F2 & F3. And within F4 & F5's corresponding parking courts.

Drainage, Foul Water, and Surface Water

- 4.17 This application is supported by a detailed drainage strategy and flood risk assessment, and includes a strategy for dealing with surface and foul water management to be implemented as part of the proposed development.

Biodiversity, Landscaping, and Trees

- 4.18 A preliminary ecological appraisal has been prepared to support the application, alongside a biodiversity net gain assessment. Further specific survey work has been undertaken to inform the site development scheme, including site-specific bat surveys during August 2022 and reptile surveys throughout September 2022.
- 4.19 The proposed development benefits from a detailed review of opportunities to improve site vegetation and landscaping, which has been left largely unmanaged for a number of years. Whilst the Site is allocated for residential development within defined urban confines for Dover, the Applicant has nonetheless sought to incorporate a meaningful enhancement of the variety and quality of landscaping present in the site, including for a net gain in biodiversity. Further details are explored later in this Statement and within the supporting submission reports and plans.
- 4.20 It is noted that both hard- and soft-landscaping strategies are submitted as part of this application (**Figure 10**).



Figure 10. Proposed Landscape Strategy

Sustainability and Energy Efficiency

- 4.21 The Site largely comprises of modular build, which is recognised as bringing about genuinely sustainable methods in automated manufacturing processes, high quality materials and smart technologies combine to deliver ultra-low carbon outcomes relative to traditional build. Through streamlined construction off-site and optimised delivery to site thereafter, there are noted improvements to air quality, noise pollution when compared to traditional on-site build. The form of modular housing sought here has been designed with sustainability in mind; over the course of its lifetime, modular housing can result in a reduction of 45% in CO2 produced from a traditional house.
- 4.22 It is noted further that the challenging site conditions, specifically relating to ground conditions and topography, lend themselves to a modular design requiring less intrusive ground works to implement the development in due course, further reducing the need for extensive site-specific operations to delivery the scheme.
- 4.23 In broader terms, the site is within a highly sustainable location, close to a range of services and facilities. Regular bus and train services are accessible within walking distance of the site. The development will comprise covered, secure cycle storage for residents, thus promoting forms of transport other than car.
- 4.24 Furthermore, all units will provide general storage space and refuse storage space, with provision for general waste and recyclable waste. Again, external amenity space, which contributes to resident wellbeing will be provided in the form of front and rear gardens for all units.

5. PLANNING POLICY CONTEXT

- 5.1 Decisions on planning applications must be made in accordance with the policies of the development plan unless material considerations indicate otherwise. Here, the development plan for the purposes of S38(6) of the Planning and Compulsory Purchase Act (2004) comprises the Core Strategy (adopted 2010), the Land Allocations Local Plan (adopted 2015), and the saved policies of the Dover District Local Plan (adopted 2002).
- 5.2 The Proposals Map to the *adopted* Development Plan Documents explicitly designate the application site for residential development as outlined later in this Statement.
- 5.3 There are a number of other material planning policy considerations relevant to determination of this proposal, including the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG) together with emerging local planning policy documents and supplementary guidance.
- 5.4 It is of central importance to assessment of the proposed development to note that the emerging Local Plan (guiding development up to 2040, if adopted) is currently due for consultation at Regulation 19 Stage (Submission Draft Local Plan). It is considered that the emerging Local Plan attracts increasing weight as a material consideration in assessment of this application as it progresses towards (and through) Examination in Public, and relevant emerging planning policies are listed herein and referred to in Section 6 as appropriate.
- 5.5 Against this context, the following local and national policy considerations will be relevant to the determination of this application.

LAND ALLOCATIONS LOCAL PLAN (2015)

- LA8 – Land in Coombe Valley

CORE STRATEGY (2010)

- CP1 – Settlement Hierarchy
- CP4 – Housing Quality, Mix, Density, and Design
- DM1 – Settlement Boundaries
- DM5 – Affordable Housing
- DM11 – Location of Development and Managing Travel Demand
- DM13 – Parking Provision
- DM15 – Protection of the Countryside
- DM16 – Landscape Character

SAVED POLICIES OF DOVER DISTRICT LOCAL PLAN (2002)

- 5.6 The Saved Policies of the Dover District Local Plan are not considered of direct relevance to the proposed development, given that many of these have since been superseded as above.
- 5.7 These central policies are considered of most relevance to the proposed development.

NATIONAL PLANNING POLICY FRAMEWORK (NPPF) (2021)

- 5.8 The NPPF is a material consideration in assessment of this application. The NPPF was updated on 21 July 2021 and revised paragraph numbers are referred as relevant. The NPPF requires applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Paragraph 2 advises that the NPPF is a material consideration in planning decisions.
- 5.9 Paragraph 8 advises that achieving sustainable development means that the planning system has three, interdependent overarching objectives:

- an economic objective

- a social objective
- an environmental objective

5.10 As a whole, the Framework seeks the pursuit of sustainable development which is described as seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):

- Making it easier for jobs to be created in cities, towns and villages;
- Moving from a net loss of bio-diversity to achieving net gains for nature;
- Replacing poor design with better design;
- Improving the conditions in which people live, work, travel and take leisure; and
- Widening the choice of high quality homes"

5.11 **Paragraphs 10** outlines the presumption in favour of sustainable development and **Paragraph 11** confirms that this presumption in favour should be applied as follows:

For decision-taking this means:

- c) *approving development proposals that accord with an up-to-date development plan without delay; or*
- d) *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, granting permission unless:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁶; or*

- ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

5.12 **Paragraph 38** provides guidance in relation to 'decision-making' and outlines that local planning authorities should approach decisions on proposed development in a positive and creative way and should also look to work pro-actively with applicants and seek to approve applications for sustainable development where possible.

5.13 **Paragraphs 56 and 57** comment;

The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

5.14 **Paragraph 123** emphasises that Local Planning Authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to:

- a) *use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework; and*

b) make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space.

5.15 Chapter 12 of the Framework seeks to achieve well-designed places, and in this regard is key in the assessment of the proposed development. In particular **Paragraphs 126, 127 and 130** which collectively seek to ensure that developments will function well and add to the overall quality of the area, are visually attractive and are sympathetic to local character, among other listed objectives.

5.16 **Paragraph 176** identifies that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. It states further that the scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

5.17 **Paragraph 177** is clear that when considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

5.18 Footnote 60 pursuant to this paragraph refers to the definition of ‘major’ in this context, and states that:

“‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined”

5.19 Due regard is had to the Framework as a material consideration.

EMERGING DOVER DISTRICT LOCAL PLAN

5.20 As elsewhere, we note that the emerging Local Plan is currently in draft (Regulation 19) format, having been the subject of public consultation previously at Regulation 18 stage.

5.21 The Local Development Scheme (LDS) for the District (Dated September 2022) confirms submission of the Plan for Examination in Q1/2 2023, and a target adoption in 2024. The progress of the Plan is noted, and its contents are considered to carry increasing weight relative to the stage of plan preparation reached.

5.22 Emerging policies considered of most relevance are listed as follows:

- Policy SP3 – Housing Growth
- Policy SP5 – Affordable Housing
- Policy SP14 – Enhancing Green Infrastructure and Biodiversity
- Policy SAP9 – Land at Barwick Road Industrial Estate, Coombe Valley, Dover (DOV022B)
- Policy CC2 – Sustainable Design and Construction
- Policy CC5 – Flood Risk
- Policy PM1 – Achieving High Quality Design, Place Making and the provision of Design Codes

- Policy PM2 – Quality of Residential Accommodation
- Policy PM3 – Providing Open Space
- Policy PM4 – Sports Provision
- Policy H1 – Type and Mix of Housing
- Policy TI1 – Sustainable Transport and Travel
- Policy TI2 – Transport Statements, Assessments and Travel Plans
- Policy TI3 – Parking Provision on New Development
- Policy NE1 – Biodiversity Net Gain
- Policy NE2 – Landscape Character and the Kent Downs AONB

5.23 Emerging Policy SAP9 – ‘Land at Barwick Road Industrial Estate, Coombe Valley, Dover (DOV0228)’ applies specifically to the application site. Commentary against this emerging set of planning policies is provided in Section 6 of this Statement, noting a clear direction of travel.

SUPPLEMENTARY PLANNING GUIDANCE

5.24 Dover District Council has also adopted a suite of Supplementary Planning Documents that are relevant to the determination of planning applications.

5.25 In this instance it is considered that the following are relevant and have been considered across the application documents. Due reference is made both here and in related specialist reports to the following where appropriate:

- the Kent Design Guide (2005);
- the Kent Downs Management Plan 2021-2026

6. PLANNING ASSESSMENT

6.1 Having regard to the relevant planning policy provisions as summarised above in Section 5 and other material considerations, it is submitted that the principal issues relevant to the determination of this application will be:

- The principle of the development in this location, with due regard to the redevelopment of a vacant brownfield site as allocated both within the adopted development plan, as well as proposed for allocation in the emerging Local Plan (Regulation 19);
- The design of the proposed development, with reference to visual impact and amenity;
- The potential impact(s) of development on the landscape character, including the designated Kent Downs AONB which abuts the western boundary of the Site;
- The impact upon neighbouring residential properties, and potential interaction with neighbouring light industrial / commercial land uses; and
- Matters of highways and parking.

THE PRINCIPLE OF DEVELOPMENT IN THIS LOCATION

6.2 Both the NPPF and adopted development plan support the delivery of sustainable development and new housing in sustainable locations.

6.3 Policy CP1 directs growth to Dover as the primary focus for new housing in the District, specifically within the urban area as defined on the policies map. It is relevant in this regard that DM1 directs growth generally within the identified settlement boundaries. Although located towards the edge of the town where it meets the boundary for the Kent Downs AONB, the Site falls

within the urban area and, as an overarching principle, is considered an acceptable location for residential development.

6.4 Whilst the weight given to CP1, DM1, and DM11 of the Core Strategy have been recently queried under various planning decisions in respect of their consistency with national policies, it is submitted that the Site is clearly a sustainable location for development at the broadest level.

6.5 This is all the more salient given the allocation of the Site in the adopted Land Allocations Local Plan (2015). Policy LA8 'Land in Coombe Valley' allocates a number of parcels in the valley – including the Barwick Road site – for residential development of up to 450 dwellings. The rationale underpinning this allocation is to bring forward comprehensive regeneration to re-balance the commercial and housing uses, improve housing quality and choice and environmental quality.

6.6 The wider strategic allocation under Policy LA8 seeks circa 450 dwellings across 8 sites in the valley. This allocation has to date delivered only in part, largely on parcels at the lower end of Coombe Valley Road. It appears that little of this allocation has come forward to date for various reasons. Whilst the allocation seeks to maximise capacity across these sites, it is understood that the Barwick Road site itself is not specifically allocated for a set number of units under the adopted plan. This is confirmed in the received pre-application advice from Dover District Council dated 6 September 2022 which went on to confirm that the opportunities and constraints presented by the Site necessitate a suitably balanced and quality scheme, guided by matters such as ground condition, topography, land uses, and design quality. As a point of reference, this allocation makes no reference to detailed design matters nor to the specific characteristics of the Site and its precise indicative development parameters.

6.7 It is noted that Policy LA8 is criteria-based, where development will be permitted where the following are met:

i. the mix of dwellings should includes larger units, to reflect the SHMA, to promote family housing;

The proposed development has been specifically designed to offer a range of family housing, with dwellings ranging from 2-4 bedrooms across different housing types and configurations including flats and houses, with houses varying between two and three storeys. The proposed mix reflects the findings of the recent SHMA partial update (2019) as published, with due regard to wider market considerations.

Criteria (i) is considered satisfied.

ii. development seeks to maximise the use of available land, at a minimum of 40dph;

It is noted that pre-application discussions with Dover District Council confirm that whilst an allocated site should seek to maximise delivery, this should be a balance across technical opportunities and constraints. Policy LA8 applies to multiple sites in the Coombe Valley, including those in denser character areas where 40dph is arguably more appropriate. We note that the Site is located to the boundary of the Kent Downs AONB, and as such due regard has been had to this and other such site characteristics in defining a suitable and appropriate development yield across the Site. Pre-application advice confirmed as elsewhere in this Statement that a reduced quantum of development at the Site could be appropriate. It is noted that the emerging Regulation 19 Plan seeks a reduced site-specific quantum of development at circa 150 dwellings. The proposal has been prepared in this context, as supported by technical assessment.

Criteria (ii) is considered satisfied.

iii. proposals comply with the Health and Safety Executive's (HSE) requirements for development in proximity to gas holders;

Criteria (iii) applies to other land parcels within the allocation of LA8, and not to the application site.

iv. If street lighting is required this should be designed to minimise the impact of light pollution and conserve the dark night skies of the AONB; and

Details of street lighting can be conditioned for further assessment by the LPA, though it is expected that minimal street lighting will be provided. The specification for any street lighting can be provided at a later date, where appropriate to do so. Hard and soft landscaping plans are submitted as part of this application.

Criteria (iv) is considered satisfied, relative to the proportionate level of detail provided at this stage, subject to planning condition for the detailed specification.

v. the development should provide a connection to the sewerage system at the nearest point of adequate capacity and ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

A drainage strategy – including for foul drainage – is submitted as part of this application, following engagement with the LLFA to inform the wider water strategy for the development site. The details of this should be considered in the round and through consultation with relevant stakeholders.

Criteria (v) is considered satisfied.

6.8 In the context of adopted Policy LA8, it is the case that the proposed development roundly accords with the detailed criteria underpinning the LPA's assessment of what should constitute a permissible form of residential development in this location.

6.9 This allocation under Policy LA8 of the adopted Land Allocations Plan for residential development establishes a clear and unencumbered acceptability in principle of the proposed development.

- 6.10 For completeness, it is referenced that the LPA has previously supported development in this location (ref. DOV/07/01095 and ref. DOV/12/00111), and continues to support such through the allocation of the Site in the Land Allocations Local Plan (2015) which has passed through dependent examination.
- 6.11 Reiterating its clear support for the proposal, the LPA has commented as recently as September 2022 that:
- “We support the development of this site for residential development as an allocated housing site, within a suitably sustainable location within the urban confines of Dover. The proposal is also supported by the NPPF which seeks to focus the location of new housing development within sustainable locations”*
- 6.12 It is furthermore a material consideration that the emerging plan seeks to allocate the Site once more for residential development, again providing a clear baseline acceptance of the delivery of a housing-led scheme in this location over the wider plan period.
- 6.13 The emerging Local Plan seeks to carry over this allocation. It identifies the Site under draft Policy SAP9 (ref. DOV022E – Barwick Road Industrial Estate, Land in Coombe Valley) for an estimated capacity of circa 150 dwellings to be delivered over the period 2025-2029, subject to specific transport and contamination assessment. It should be noted that the Applicant will – in due course – be submitted representations to support this allocation and its continued inclusion in the emerging Local Plan, which will garner greater weight as it progresses towards examination and adoption throughout 2023 and 2024 respectively.
- 6.14 It is noted that the site currently does not encompass the entirety of the allocated site, either under the adopted or emerging plan. The adjoining ‘Cactus Graphics’ site falls outside of the control of the Applicant. The proposed development site covers circa 70% of the overall allocated site. That said, the proposed layout allows for a vehicular and pedestrian connection through to this part of the wider allocation in due course, and would not prejudice delivery of the allocation.
- 6.15 The allocation is a clear and deliberate effort by the LPA to address housing delivery in the District in its continued inclusion of this Site for residential development. Its objectives in delivering residential development are clear. The draft policy is a material consideration of increasingly significant weight in any assessment of the proposed development, particularly when considered against the directives of the NPPF which seek to boost delivery of housing in sustainable locations, specifically on brownfield sites within urban areas.
- 6.16 Again, this is a criteria-based policy, against which the development proposal has been prepared including the detailed matters identified in criteria A-I of the emerging policy which include for matters of:
- a) Design and visual character
 - b) Designing to avoid or minimise impacts on the Kent Downs AONB including a sensitive landscaping scheme
 - c) Primary vehicular, pedestrian and cycle access from Barwick Road;
 - d) Noise mitigation to protect the amenity of future residents;
 - e) Opportunities for biodiversity retention and enhancement;
 - f) Flood risk assessment;
 - g) Land contamination mitigation measures;
 - h) Sewerage and detailed foul drainage strategy; and
 - i) Open space and community facility requirements
- 6.17 The above criteria have duly informed the design evolution of the proposals, which are considered to be in keeping with the thrust of this detailed policy directive which intends to support the delivery of the Site.

6.18 The National Planning Policy Framework affords weight to as yet adopted local plans at paragraph 48 stating;

Local planning authorities may give weight to relevant policies in emerging plans according to:

a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

6.19 Considering part a) of the above it is noted that the draft Local Plan is at a Regulation 19 stage (submission). It has been the subject of Regulation 18 consultation, and has been advanced in the interim as guided by a suite of detailed technical evidence base. It is expected that – at the time of writing – the Regulation 19 Plan will be published for consultation imminently. Whilst awaiting submission to the Secretary of State for its Examination in Public (EiP), the draft allocation is considered to fall at an advanced stage, attracting some weight in decision-making as a clear and direct intention of the LPA in demonstrating a direction of travel for residential development delivery in Dover.

6.20 Considering part b) of the above, it is noted that the draft allocation policy received minimal commentary during the public consultation of the Local Plan Regulation 18 stage, and has in the past been incorporated in the adopted Land Allocations Plan having been through its own examination processes. The same level of support is anticipated in the progression of the allocation

into the Regulation 19 Submission Plan Public Consultation and subsequent submission to the Inspectorate.

6.21 Considering part c) of the above, Dover District Council has proposed the allocation policy having due regard to the provisions of the NPPF and other such material considerations. A criteria-based policy is identified as part of the allocation, providing a clear guide to development of the Site with due reference to overarching objectives and policies at the local and national levels, as appropriate.

6.22 Paragraphs 49 and 50 of the NPPF indicate that prematurity (ahead of adoption of policy) is seldom a justification for refusal of planning permission. It is likely that the emerging Local Plan will have been submitted for formal Examination in Public (EiP) at the time of any planning decision on this application being made.

6.23 The development constitutes sustainable development, through its residential element, landscaping, transport connectivity, and net biodiversity and landscape gains. Together these will deliver social, environmental and economic benefits which inter-alia include:

- **Social** – the Site comprises the redevelopment in part of a large previously developed site and will make effective and efficient use of an enclosed site within urban confines. The development will deliver social benefits in the form of much needed new housing, and housing mix, in the context of a ‘Build to Rent’ scheme. The introduction of new residents will also contribute towards the vitality of this part of Dover, and community and support local services and facilities, including the primary school.
- **Environmental** – the proposed development is focused on a landscape-led design, and generates a net-biodiversity gain in line with the Environment Act. Whilst the site is in a visually sensitive location, the proposals are informed by an appropriately detailed

landscape visual appraisal. The landscape and biodiversity enhancements are targeted at enhancing the setting of the AONB and offsetting any harm resulting from the residential element proposed, albeit supported in principle by the allocation of the Site for residential use.

- **Economic** - The proposed development will require the provision of construction related services including the Applicant Oliver Davis Homes, themselves based locally within Kent. This will provide a significant, albeit short-term, employment and economic boost. Local businesses will have the opportunity to be involved in this process. The new development will ultimately introduce new residents to the local area, who will in turn benefit local service and retail related businesses, boosting the immediate local level economy, as supported throughout the NPPF; housing should be located where it will enhance or maintain the vitality of rural communities.

6.24 Against this context, it is submitted in matter of overall planning principle that the delivery of a residential scheme in this location within urban confines of an allocated site is appropriate and should be met with support by the LPA, subject to technical matters, including design and landscape impact(s).

DESIGN MATTERS

6.25 The appearance of the Site is influenced by the context of surrounding development and its own parameters as analysed in detail in the supporting Design and Access Statement prepared by Hollaway Studio.

6.26 The detailed content of the Design and Access Statement is not repeated here, and reference must therefore be made to the application pack as a whole.

6.27 The Site does not fall within any designated conservation area or similar land-based designation. The primary policies relating to design matters therefore

relate to Policies CP4 of the Core Strategy, as well as Policies DM15 and DM16 which deal with landscape impact(s) resulting from development. Chapter 12 of the NPPF is also a key consideration.

6.28 Collectively these policies aim to secure quality and inclusive design that is sensitive to surrounding planning context, including the countryside and AONB and in general look to support development that:

- Relates to surrounding development, form, and layout and strengthen links to adjacent areas;
- is well designed, respect and enhance the character of the area paying particular attention to context and identity of its location, scale, massing, rhythm, density, layout and use of materials appropriate to the locality, including the landscape character and setting (here relating most directly to the AONB which directly abuts the Site). The development itself must be compatible with neighbouring buildings and spaces and be inclusive in its design for all users;
- Incorporates a high degree of permeability for pedestrians and cyclists, provide safe and satisfactory access for pedestrians, public transport and other vehicles, ensuring provision for disabled access;
- Improves people's quality of life by creating safe and accessible environments, and promoting public safety and security by designing out crime.

6.29 It is noted that the supporting text to the Land Allocations Local Plan makes clear reference to the Site specifically:

“Development further up the valley at Barwick Road, a vacant industrial site, adjoins the industrial area to the west of the valley. Development on this site will need to address the changes in the levels between the site

and Barwick Road and provide an active street frontage to Barwick Road along with pedestrian connections to the Triangles Community Centre. The design of the proposed development proposals should seek to improve the setting of and impact on the AONB”.

- 6.30 With this policy context in mind, the proposal seeks to introduce a high quality vernacular design development in the delivery of this allocation site.
- 6.31 Drawing on local context as a baseline position, and on local examples of approved design elsewhere in the Coombe Valley, the designs which underpin the proposed development reflect a contemporary approach to residential development wherein a combination of traditional build (on-site; for the flatted blocks) and modular construction off-site (for the houses) come together to create a whole scheme that sits sympathetically across a well-contained site within this part of the valley.
- 6.32 It is noted that the proposals have developed extensively since the earlier pre-application discussions, led closely by officer advice which in summary on design matters considered that a more successful scheme would address the following matters:
- Further increase the number of residential units to be more in line with the number allocated to the site (220 at the Reg 18 stage; now 150 at the Reg 19 stage).
 - The proposed development should better address the level changes between the site and Barwick Road, and provide an active street frontage to Barwick Road;
 - The proposals should seek to improve the setting of and impact upon the AONB, informed by soft and hard landscaping and appraisal of the scheme from a landscape perspective;
 - The proposed development should consider the relocation of the 3 storey buildings away from the higher ground levels of the site, with 2 storey development located towards the site’s plateau;

- The scheme should explore a reduction to the frontage parking layouts, and consider greater pedestrian connectivity;
- The proposals should also introduce further variety in the architectural response to the context using a variety of roof forms, recognising the limitations in plan form owing to modular design construction.

- 6.33 It is noted that the Applicant has responded in full to these comments, and puts forth a confident scheme that directly addresses these items, resulting in both an increase in overall numbers as directed by officers (from 102 to 120 to 137 units successively) and a greater degree of variety within the Site. It is emphasised that the scheme has been greatly reshaped by a detailed appraisal from landscape perspective and the introduction of a significant volume of landscape planting and strategy.
- 6.34 Analysis of the surrounding character area underpins a proposed mix of materials to create a more interesting and attractive street scene, strengthening the Site’s sense of place and cohesion. The proposed materials palette is outlined in detail in the supporting Design and Access Statement and visually summarised in **Figure 10** overleaf. It is considered that the materials used for the proposal would be sympathetic to the surrounding area and within keeping of the surrounding street scene, with reference to the existing form and roof types – specifically along Barwick Road and Beaufoy Terrace – reflected in the design approach of the houses here (**Figure 10**). Whilst the proposed development does not seek to depart wholesale from the established design vernacular in this part of Dover, it does nonetheless seek to enhance it. A combination of finishes and detailing is proposed which seeks to add some visual intrigue to the proposals, whilst mirroring elements of the predominantly brick-built vernacular nearby. Cognisant of the Site’s relationship to existing dwellings, it has been key in the design evolution since early pre-application engagement to further refine the design scheme to more confidently reflect the strongest design forms and features nearby within the scheme, which here helps to more keenly embed the proposals within the wider setting.

- 6.35 Roofs are largely hipped or half-hipped, with variation provided at the request of the LPA during pre-application discussion. Flat roofs with green roof features are also proposed to the taller flatted blocks, enhancing biodiversity within the Site but also making due reference to views to/from the scheme and the wider Kent Downs AONB.
- 6.36 It is also emphasised that a detailed hard- and soft- landscape strategy accompanies this submission, which reflects a high quality scheme proposal well-integrated with the existing biodiversity features of the site. Due regard must be had to this landscaping strategy.
- 6.37 As a whole, the proposed development is considered to be of proportionate scale and massing to its location, reflective of the adopted and emerging policy position. The present application does not depart from these design parameters already endorsed by the LPA in the allocation of the Site, and is considered moreover to reflect the expectations and aspirations of relevant design-based policies of the development plan.



Figure 10. Proposed materiality in context, across the proposed housing typologies including 2, 3 and 4 storey development using both traditional and modular construction methods.

RESIDENTIAL AMENITY

- 6.38 In considering residential amenity, the proposed layout identifies dwellings within generous plots with reasonable separation distances from neighbours, with the site layout further developed on the advice of the LPA to better respond to dwellings along Barwick Road. It is relevant that the Site does not generally share a common boundary with many residential buildings, namely to the south, west, and east and in this regard the impact(s) on residential amenity are considered to be proportionately limited.
- 6.39 It is considered that the proposed development would reflect a similar relationship of built form and land uses elsewhere in this part of Dover, with the visual and physical relationships of development (existing and proposed) closely influenced by topography. The supporting Design and Access Statement identifies the evolution of the proposed site layout, demonstrating how a confident frontage along Barwick Road seeks to mirror elements of nearby development which in its own right rises with the land, whereas the proposal generally falls with the land in the opposing direction. Flatted development is generally located within the central spine of the Site, with the proposed storeys heights (themselves ranging between 3 and 4 storeys for the flatted blocks) mediated somewhat by a combination of separation distances to existing dwellings, internal site topography, and a variation in roof form and design vernacular introducing a greater visual variety across the Site.
- 6.40 With respect to the amenity of future occupiers, all units are shown to comply with the relevant Nationally Described Space Standards and provide a comfortable internal layout. An accommodation schedule is provided as part of this application. It is noted that all dwellings are provided with secure private rear gardens, which whilst modest, are considered to be acceptable relative to the size of the dwelling proposed as reflect in received pre-application advice from the LPA. Each dwelling benefits from sufficient storage for cycles and refuse. The flatted blocks themselves benefit from private space where available.
- 6.41 Overall it is strongly considered that the proposal would bring about no detrimental impact upon amenity for neighbouring or future occupants in accordance with relevant adopted and emerging Local Plan policies, as well as Paragraph 127 of the Framework.
- 6.42 This position has been clearly supported in principle – and indeed based on earlier design iterations – by the LPA, which noted in written pre-application advice that:
- “It is considered unlikely that any adverse impacts would arise from the built form of the development given the location of the site, its separation distance and relationship with adjacent development, and the ground level changes. Similarly, it is considered unlikely that there will be any adverse overlooking implications”*
- 6.43 Notwithstanding the evolution of the proposed site layout and overall design, there is considered to be no adverse change to the proposed scheme as submitted (relative to the pre-application design package) which should justify a departure from the LPA’s previous position as reported above.
- 6.44 The proposal will provide a high quality and well-designed form of development in a manner that will sit appropriately within the surrounding built environment and landscape context, duly informed by technical assessment of the Site’s opportunities and constraints, taking heed of pre-application advice received from Dover District Council. It is submitted that as the proposal addresses the sensitivities of the surrounding area, the proposed development roundly accords with the design policies of the adopted development framework for the District, and in keeping with the thrust of emerging Local Plan Policies and with Chapter 12 of the NPPF as material

considerations, which collectively promote and support quality design and the integration of new development into the natural and built environments.

LANDSCAPE IMPACT(S) ON THE KENT DOWNS AONB

6.45 Policy DM16 of the Core Strategy seeks to protect against harm to landscape character. Chapter 15 of the NPPF likewise seeks to do the same, with particular emphasis on the protection of the AONB as a heavily protected national landscape designation.

6.46 The Site falls adjacent to the land-based policy designation of the Kent Downs AONB, which is clearly protected by local policies and is the highest level of landscape protection at the national level.

6.47 DM16 of the adopted Core Strategy also explicitly acknowledges the role of allocations in assessing landscape impact(s), noting:

“Development that would harm the character of the landscape, as identified through the process of landscape character assessment will only be permitted if:

- I. It is in accordance with allocations made in Development Plan Documents and incorporates any necessary avoidance and mitigation measures; or*
- II. It can be sited to avoid or reduce the harm and/or incorporate design measures to mitigate the impacts to an acceptable level.”*

6.48 Given the allocation of the site for development under the adopted Local Plan and its emerging status, plus the backdrop of existing development against the Site alongside its previously developed nature – that a proposal of the parameters and type would not unduly conflict with the protection of either the wider character of the countryside beyond the Site or the specific character of the Kent Downs AONB in this location specifically.

6.49 Nonetheless a Landscape Visual Appraisal (LVA) has been prepared to inform the design and assessment of the proposed development proposal. The LVA assesses the proposed development in the context of the existing landscape character, visual environment and landscape related policy environment.

6.50 As a baseline, the LVA describes the Site’s existing character and further identifies that the Site lies adjacent to the existing built form (both residential and industrial) in the immediate setting (and, in fact, within) the Kent Downs AONB in this part of Dover, which itself is identified within urban confines for the settlement. It is noted that the AONB boundary includes (or rather washes over) much of the light-industrial development nearby. This is therefore an established part of the character of this specific part of the AONB – which is not exclusively a high quality landscape.

6.51 Whilst the LVA should be read in full, a summary of conclusions is presented as follows:

- The Site lies in a settlement edge location, with residential development already associated with the site and residential properties associated with this part of Dover and the wider Coombe Valley extending to the north and east, with commercial and light-industrial development to the west and south;
- Residential built form and domestic features already characterise the site and its setting and, as such, it is considered that the proposals would not introduce any new or alien components into this landscape setting;
- retaining much of the key vegetation structure associated with the site, the proposals also include a comprehensive scheme of new planting. As this planting matures it would not only assist the integration of the proposed built form with its setting , but would also contribute positively to local biodiversity;

- The development on this site is proposing brown roofs on the apartment blocks on the western end of the site to reflect the previous green connecting space from the southern boundary to the northern.
- Proposed interspersed mixed native trees and shrubs are proposed around the southern and western boundary of the site. This will aid foraging for a number of species as well as enhancing biodiversity whilst softening the proposed built form from the commercial units to the south.
- The proposed green bank along the northern boundary of the site will soften the topographical changes on the site for residents of the proposed dwellings fronting Barwick Road.
- The glimpse views of the proposed built form on the subject site from the south on Poulton Close will be softened by the proposed mitigation as well as providing ecological habitat links and biodiversity improvements.
- The proposals plan to recreate the existing mosaic of the existing habitats and vegetation on the site as much as possible through the proposed surface treatment of grasscrete being made up of a mix of crushed stone and a seed mix of local provenance to reflect the existing open mosaic habitat on site and to provide the strongest replacement within the site proposals. This alongside significant reinforcement mitigation planting along the northern, western and southern boundaries as well as the proposed brown roofs and tree and trellis planting across the site for enhancement of the landscape and biodiversity connectivity across the subject site;
- The thorough analysis of the views from the carefully selected viewpoints shows that the proposed built form of the development on this site is mostly visible from the long distance viewpoints on

higher ground and from Barwick Road immediately north of the subject site.

- The two historical aerial images shown here clearly evidence the site without the 'green link' to the west of the site during the years 1990 & 2002. The site is shown as being cleared of vegetation in 1990 and being used as hardstanding for vehicle/container storage in 2002. The consented outline scheme for this site ignores the existing 'green link' and shows continuous linear built form across the site running north/south. The 'green link' although recent in its visual form is an important part of the landscape character of the subject site and the surrounding AONB. The proposals seek to retain the existing visual 'green link' on the western end of this site by proposing brown roofs along the flat blocks, and increasing the landscape opportunities within this zone running north/ south. These landscape proposals will honour the visual link and reflect the AONB Management Plan Vision 2021-2026
- The hard and soft landscape masterplan has been designed to soften the proposals and reinstate the green link across the site visually connecting the two areas of open space outside of the subject site to the north and south. Once the boundary and internal mitigation planting has established, this will further enhance the landscape character which will be in keeping with the surrounding properties and provide the next 30-50 years of tree cover. Visibility is likely to increase during the construction of the proposed built form, dependant on the construction equipment which is used, however this will be for a limited period as all of the houses are being manufactured off site and will take days to erect on site.
- Landscape mitigation is provided to soften the proposed built form and create appropriate landscape character on the site, whilst enhancing biodiversity.

- 6.52 Overall, the findings of the LVA indicate that the proposals could be integrated without detriment to the key characteristics or special features that define this part of the Kent Downs AONB. The proposals could be integrated in this location without giving rise to any long term notable adverse effects upon the receiving visual environment or the appearance of the area.
- 6.53 With specific regard to policy provisions, whilst the Site and parts of its wider setting lie within the Kent Downs AONB this national landscape designation elevates the sensitivity of the sites setting, but it is noted that the designation does not preclude sensitively designed development.
- 6.54 It is considered that the proposals would conserve and enhance the localised setting of the Site and its character, working well within the topographic character of the Site ensuring that the built form does not appear prominent and would not give rise to the perception of the settlement extending out beyond the established settlement boundaries, into the wider rural setting of the Kent Downs.
- 6.55 It is considered that the proposals can be integrated in this location without long term adverse effects upon the receiving landscape character and visual environment. It is concluded that the proposals are supportable from a landscape and visual perspective.

PROPOSED HOUSING MIX

- 6.56 Adopted Policy CP4 of the Core Strategy is clear in its intentions to create, reinforce, and restore the local housing market in which development is located through an appropriate housing mix and design, "...taking account of guidance in the Strategic Housing Market Assessment and the need to create landmark, foreground, and background buildings, vistas, and focal points".
- 6.57 The proposed scheme reflects the requirements of the Strategic Housing Market Assessment (SHMA) 2019 Partial Update, insofar as it seeks to provide for balanced communities and family accommodation.

- 6.58 The scheduled of accommodation identifies 74 dwellings and 63 apartments, ranging in size and housing type for 2 bedrooms to 4 bedrooms. The proposed mix is considered appropriate to the Site's delivery, and reflective of local and market conditions.
- 6.59 Emerging Policy H1 identifies that proposals for 10 or more dwellings will be required to demonstrate how the mix of tenure, type and size of housing proposed on site reflects the Council's latest evidence of housing need and market demand and contributes towards meeting the varied needs of different households including single person households, couples, families with children, older people, people with disabilities and people wishing to build their own homes. For completeness, Emerging Policy SAP9 relating specifically to the allocation of the Site for residential development does not itself prescribe a particular target site-specific housing mix.
- 6.60 As above, the proposed development provides an appropriate and considered mix of dwellings, albeit as a build to rent model.
- 6.61 In respect of Affordable Housing, the challenges of delivering a specific quantum of Affordable Housing in Dover are well-noted and the impacts of such on the overall viability of schemes have been referenced by the LPA in its own evidence base supporting the emerging Local Plan.
- 6.62 Adopted Policy D5 addresses Affordable Housing. It outlines that the Council will generally seek applications for residential developments of 15 or more dwellings to provide 30% of the total homes proposed as affordable homes, in home types that will address prioritised need, and for developments between 5 and 14 homes to make a contribution towards the provision of affordable housing. Affordable housing should be provided on the application site except in relation to developments of 5 to 14 dwellings which may provide either on-site affordable housing or a broadly equivalent financial contribution, or a combination of both. The exact amount of affordable housing, or financial contribution, to be delivered from any specific scheme will be determined by economic viability having regard to individual site and market conditions.

- 6.63 However against this, it is also a material consideration that whilst only some weight can be afforded to the Regulation 19 Plan at this time, it is highly relevant that it clarifies at Policy SP5 – Affordable Housing (para. 3.78-3.80) that:
- “The Local Plan has therefore been informed by a Strategic Housing Market Assessment (SHMA) and Whole Plan Viability Study which assessed the impact of the affordable housing requirements on the deliverability of the plan, and considered various options for the levels and types of affordable housing, balanced against other policy requirements.*
- The Viability Study concluded that within the Dover Urban Area (as identified in Figure 3.1) through the testing of a number of scenarios, it is not viable to require affordable housing, including the minimum requirement in the NPPF for 10% affordable homeownership. The policy below therefore sets out that no requirement will be placed on new schemes within the Dover Urban Area. This will assist with the delivery of brownfield sites in the town, contributing to the regeneration of the area.***
- Although there is no specific requirement for new developments to provide Affordable Housing in the Dover Urban Area, it is important to note that the Council itself is also meeting the needs in the District for Affordable Housing with a range of new Council Housing currently being planned and delivered, largely in Dover and the District centres. Furthermore, several sites allocated in this Plan will be delivered by the Council as Affordable Housing schemes” [bold emphasis added by author of this report]*
- 6.64 **Figure 11** below identifies for ease the urban area for Dover where the proposed exemption from Affordable Housing will apply. This includes the application site.
- 6.65 Notwithstanding the adopted position of Policy D5, it is clear that the LPA intends to facilitate the delivery of new housing in Dover, particularly on brownfield sites, to support its wider aspirations in contributing to the regeneration of the area. This is, as above, clearly evidenced in the Council’s own evidence base which underpins the emerging Local Plan strategy itself.
- 6.66 The proposed development has been prepared in this emerging context, albeit it is accepted that the LPA will need to weight appropriately the initial conflict with the adopted planning position with the application scheme before it. It is emphasised in any event that the evidence base underpinning the Regulation 19 Plan – including specifically the work on Affordable Housing and viability within Dover – reflects the most up to date position on such matters, and the evidence base in this regard is a material consideration that should be borne in mind by the decision-maker.
- 6.67 Against this policy background, it is considered that the proposed development does provide an appropriate and considered balance of dwellings which responds proportionately to a combination of evidence-based material in the SHMA and wider market considerations seen in this part of Dover.

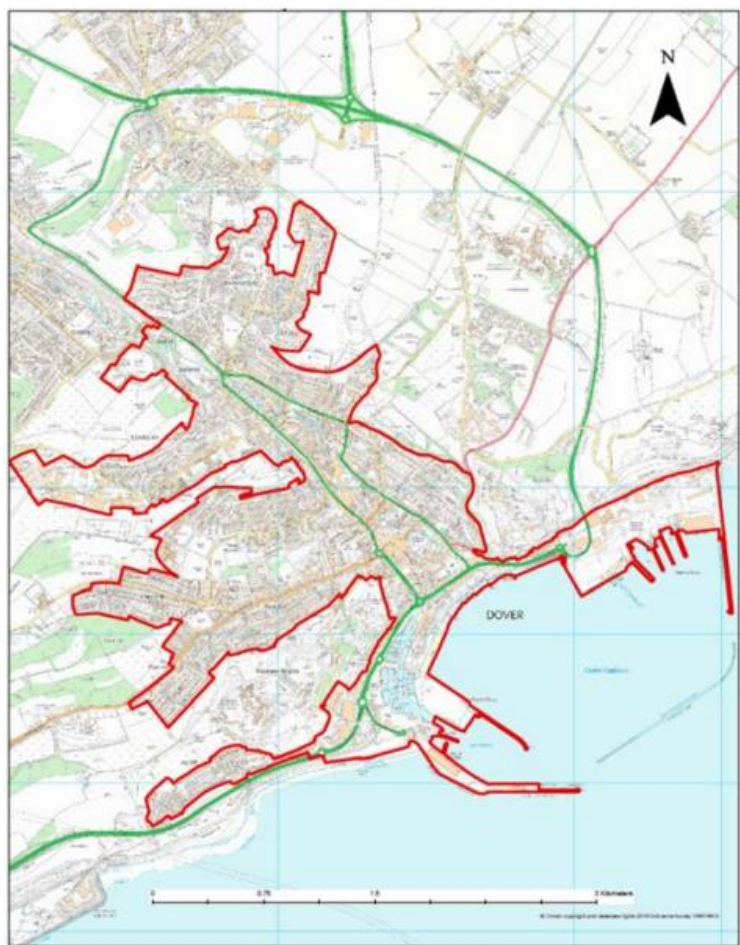


Figure 11. Affordable Housing Exemption in Dover, per Figure 3.1 pursuant to emerging Policy SP5 of the Regulation 19 Local Plan.

FLOOD RISK AND DRAINAGE

- 6.68 A detailed Flood Risk Assessment and Drainage Strategy has been prepared to accompany this submission, and should be read in full as part of the assessment of this proposal.
- 6.69 In respect of flood risk and drainage, it is most relevant that the Site falls principally within Flood Zone 1, the lowest zone of flood risk. Locations within Flood Zone 1 are defined in the PPG as being of ‘low probability less than a 1 in 1000 (0.1%) annual probability of flooding from rivers’.
- 6.70 As the proposed development is for residential land uses, it constitutes a ‘more vulnerable’ land use class. A residential land use is considered appropriate in Flood Zone 1. As directed by relevant guidance notes, the location of the Site within Flood Zone 1 means that neither the sequential or exceptions tests are applicable.
- 6.71 The submitted report concludes that the risk of flooding from sources is generally low, with medium risk of surface water flooding only. As the entire site lies within Flood Zone 1, it is considered that access in egress to the site will be safe. Although it is considered that the risk of flooding from all sources is generally low, and the development can be operated safely and without significantly increasing flood risk elsewhere, there are a number of residual risks have been identified, associated with public sewers, site drainage and water supply pipes and intense rainfall. Appropriate mitigation measures have been provided in Table 7.1 of the submitted FRA to address and manage the residual risk from these forms of flooding.
- 6.72 A surface water drainage strategy is also submitted as part of this application. The surface water drainage strategy has been developed by Create Consulting and is outlined within the supporting documentation.
- 6.73 The surface water drainage design will be developed at the detailed design stage with consideration of the above though it is emphasised that for the

purposes of the FRA an outline strategy has been developed to demonstrate it is feasible for the site to meet requirements in relation to attenuation of surface water runoff in accordance with relevant policy provisions.

- 6.74 The foul water generated from the development would be discharged using the existing network. The foul water drainage network will be designed and detailed to adoptable standards to accommodate foul flows from the net increase of no. 137 dwellings, connecting into Southern Water drainage network, subject to the necessary permissions and agreements with Southern Water.
- 6.75 In this regard, the proposal is considered to comply fully with the provisions of the Local Plan. As a material consideration in determination of this application, it is also relevant that the proposed development is considered to accord with the provisions of emerging related policies of the Local Plan Regulation 19 draft.

ACCESS, PARKING AND TRANSPORTATION

- 6.76 In the context of this application relevant planning policies dealing with highways and transport matters include Policy DM11 and DM5. Relevant emerging policies primarily include Policies TI1, 2, and 3. These collectively seek to ensure that safe access to the Site can be achieved, that appropriate vehicular and cycle parking provision can be provided, and that the development would not lead to any unacceptable detriment on the highway network, and that future development is delivered in accessible locations within or in close proximity to existing towns and villages at an appropriate scale.
- 6.77 To inform the application, a detailed Transport Statement has been prepared and forms part of this application. The submitted Transport Statement finds that the proposed development will comply with all relevant transport policies. This includes enhancing the take up of sustainable travel by

proposing new pedestrian connectivity between the site and the existing footway network, thus allowing easy access to local services on foot whilst encouraging wider permeability within the scheme itself.

- 6.78 Again, it is also noted that the Site benefits from both an adopted allocation in the current development plan for the District, and emerging draft allocation in the Submission Local Plan. This policy position confirms that, in principle, the site is suitable for residential development at the proposed quantum, as has been previously assessed under Examination in Public, and incidentally in previous planning history.
- 6.79 The Statement outlines how the existing transport network has been reviewed. It identifies that the Site has easy access to the highway network and is also close to an extensive network of Public Rights of Way providing access to the Kent Downs for recreational leisure. There is easy access to several local amenities within a short walking distance of the proposed site, including a Primary School, a shop with a post office, St Radigunds Community Centre, Buckland Hospital, and several large local employers. Dover Town Centre is located circa 2km from the Site, whilst local shops and services extend the length of London Road, towards the base of the Coombe Valley. Local services, facilities and public transport options are within readily achievable walking and cycling distance of the Site. The Port of Dover is a 20-minute walk from Dover Priory railway station. Stagecoach in East Kent provide local bus services and bus services passing along the frontage of the Site 90, 91, 92 and 92A which provide an approximate 20-minute frequency service throughout the day Dover and Folkestone and Dover and Canterbury. A wide range of services are available from the town centre.
- 6.80 With respect to the access proposals, the development scheme will include a new vehicle access point which will form a junction with Barwick Road. This can be formed in accordance with requirements set out in the Kent Design Guide. The existing access will be slightly relocated to best accommodate the development. These main and secondary accesses onto Barwick Road could also be used by pedestrians and cyclists. The level differences between the

main developable areas of the Site and Barwick Road mean that the accesses would need to be sloped, particularly in the case of the main access. However, gradients would not exceed 1:12 (8%) which is the generally accepted maximum for estate road design. Separate pedestrian connections would also be provided onto Barwick Road by means of stepped arrangements. Connections would also be provided within the Site to enable direct access to the existing community centre located immediately to the East.

- 6.81 The levels of access visibility provided at the access points to serve the scheme would meet the requirements of Manual for Streets (49m x 2.4m x 49m) calculated from the recorded design speeds along this section of Barwick Road. Dropped pram crossings would be installed at appropriate locations to link the development with the footway on the North side of Barwick Road, and vice versa. The specification of the estate new road would be in the order of 6.0m carriageway width with footways either side, also furnished with street lighting. It is expected that the existing 30mph estate road speed limit would extend into the Site, although would be designed to attenuate traffic speeds below this threshold.
- 6.82 The Transport Statement goes on to confirm that a multi-modal trip generation analysis has been carried out for the net 137 residential dwellings. The impact of the development on the Barwick Road/Coombe Valley Road would be minimal, as is demonstrated by the ARCADY traffic modelling included in this report. Beyond this point, traffic would distribute across the wider network in and around Dover with minimal effect in terms of safety and capacity. The analysis of highway accident data on Crashmap as outlined in this report does not indicate any prevailing road safety issues on the local highway network that should prevent the proposed development considered herein from coming forward.
- 6.83 Policy DM13 of the Core Strategy (which deals with parking provision) is itself clear that:

“Provision for parking should be a design led process based upon the characteristics of the site, the locality, the nature of the proposed development and its design objectives”

- 6.84 Levels of parking are to comply with the Kent County Council (KCC) 2008 parking standards (below) based on the “suburban” area classification. It is anticipated that parking spaces for cycles would be incorporated within the curtilages of the individual houses in accordance with the KCC standards. Appropriate levels of cycle parking will be available in appropriately sized garages or cycle sheds, as reflected on plan. As such, it is submitted the proposed development would provide an adequate level and standard of parking for bicycles and cars, would not result in any adverse impact on the existing highway network and does not present any highway safety issues.
- 6.85 It is noted that a separate Travel Plan accompanies this submission, proposing a number of bespoke measures including information and promotional activities to encourage the uptake of walking, cycling and public transport. The Travel Plan proposes a comprehensive package of measures seeking to encourage sustainable travel habits and the implementation of the measures will help secure modal shift in trips made by the future visitors and residents. Measures incorporated in detail within the Travel Plan include:
- The appointment of a TPC to oversee all aspects of the TP;
 - The creation of a steering group, where appropriate, which will include residents and members of the management company will meet regularly to discuss issues relating to the TP;
 - Consulting with residents on a regular basis, following consultation with the steering group formed as part of the TP;
 - Provision of a Travel Information Pack to be made available to all new residents, this will include relevant travel information such as public transport information and local route maps;
 - The use of newsletters within the proposed development to provide updated information on more sustainable transport options.

- 6.86 The proposed Travel Information Pack - the finer details of which could be approved by planning condition - will contain a number of initiatives and informative, including a map of the development relative to the surrounding area and facilities, as well as connections for cycles and walking, as well as local car sharing programmes, etc. It will further include promotional information and a cycle or bus voucher up to a set value, as well as contact details for the Travel Plan Coordinator.
- 6.87 A programme for monitoring and review of the Travel Plan is included in detail within the Travel Plan document itself, with key performance indicators suggested. The Applicant is committed through the delivery of the scheme on promoting sustainable travel modes where possible.
- 6.88 Bearing in mind the findings as outlined in the supporting Transport Assessment, there are no identified transport-related grounds preventing the proposed development at Barwick Road considered herein from being acceptable to the Highway Authority.
- 6.89 In line with the above, it is submitted that – in the context of the Site’s spatial context and analysis of likely trip generation - the proposal will proportionately satisfy the transportation provisions of the relevant adopted Development Plan policies to meet the demands of the proposed development.

BIODIVERSITY

- 6.90 The Site’s suitability to support protected species and habitats has been assessed and, where required, Phase 2 species-specific surveys were undertaken (for roosting bats and reptiles only), and appropriate recommendations and mitigation strategies are provided within the Preliminary Ecological Appraisal prepared by Native Ecology.
- 6.91 These include for:

- Habitat retention and enhancement should be designed into a Landscape Strategy to enhance boundary habitat for foraging and commuting bats, and increase connectivity within the surrounding habitat, including scrub creation and plating of native species of hedgerow;
- Construction mitigation to include covering of holes and excavations to ensure animals are not inadvertently trapped over night;
- Creation of biodiverse flat roofs where possible on suitable new buildings;
- The provision of bat, bird, and, hedgehog, and dormouse boxes across the Site;
- Installation and creation of hibernacula and/or log/brush piles within the Site;
- The implementation of ‘tool box talks’ during construction;
- Avoidance of works during key seasonal periods, subject to species presence;
- Implementation of a sensitive lighting scheme only;
- Retention of trees and hedges where possible;
- Planting of trees and habitat enhancement in the northern part of the Site, shown on the submitted habitat mitigation strategy;
- Use of native species planting;

- 6.92 The above mitigation measures have been variously incorporated into the proposed landscape strategy itself.
- 6.93 A number of species-specific surveys have been carried out to inform the development progression, including those relating to reptiles and bat emergence. Relevant and appropriate mitigation and recommendations are reflected in the specialist reports and have duly informed the development plans submitted at this stage.
- 6.94 In light of the findings and recommendations of the supporting documentation which accompanies this planning application, there is no

reason to expect that the delivery of residential development in this location would conflict with the LPA's policies relating to the protection and conservation of ecological interests. On the basis that the recommendations identified are implemented, the proposed development will not contravene any relevant legislation or planning policies pursuant to nature conservation.

- 6.95 It is further noted that a detailed Biodiversity Net Gain Report has been prepared to accompany this application. The findings of this report are derived from the survey work undertaken which provide an inventory of the existing basic habitat types present within the Site.
- 6.96 The report concludes that the proposed development can achieve a net gain in biodiversity.
- 6.97 The biodiversity net gain assessment shows that there will be a small net gain of area habitats within the Site and adjacent off-site enhancement area. This has been achieved through the inclusion of features such as biodiverse green roof, ground based green wall and grasscrete seeded with a bespoke seed mix, together with the enhancement of scrub within the off-site area.² The proposed development will result in a significant increase in linear biodiversity units through the creation of linear hedgerow habitats. New native species rich hedgerow will provide foraging and nesting habitats to benefit a wide range of wildlife, as well as habitat corridors, improving connectivity at the local scale.
- 6.98 However, the habitat trading rules for the area habitat types 'bramble scrub' and 'open mosaic habitats on previously developed land' have not been met. Proposals result in a deficit of 2.12 units of bramble scrub and 7.88 units of open mosaic habitats on previously developed land. During the site visits undertaken on the 27th July and the 27th September the open mosaic habitat was showing signs of successional transition to bramble scrub. Large areas of the Site were reclassified as bramble scrub following the September visit, reflecting this habitat deterioration. Aerial images show that the Site has been managed with regular scrub clearance which has led to the retention of open

mosaic habitat within the Site. In the absence of this management the habitat will likely rapidly transition to bramble scrub, a significantly lower value habitat. Whilst there is a relatively large post-development deficit of units for open mosaic habitat, the successional status of this habitat should be taken into account.

- 6.99 Compensation has focused on creating habitats, such as green roof and bespoke grasscrete, which will best replicate the current open mosaic habitat within the Site, and will support the species associated with this habitat type within the Site in the long-term. This is considered to provide appropriate compensation for the deteriorating open mosaic habitat within the Site. The habitat creation measures within the Site should be considered alongside species-specific mitigation requirements as detailed within the Ecological report, such as the inclusion of bat boxes, bird boxes and bee bricks.
- 6.100 The detailed landscape strategy (soft- and hard-) has been designed to maximise gains in biodiversity, increasing the attractiveness and diversity of the site in terms of biodiversity opportunities incorporated on and off site, and with integration to the built form and drainage regime where possible. It notes that the landscape proposals will improve the green infrastructure running through the Site, whilst aiming to enhance habitats to create those also connecting with the Kent Downs AONB. The findings demonstrate how over the passage of time the development will deliver positive gains in the biodiversity credentials of the Site, relative to a balance in the various other planning benefits which include the delivery of 137 residential units.

7. CONCLUSION

- 7.1 Recognising its planning context, the Site benefits from an existing allocation for residential development under the existing, adopted Local Development Framework – specifically Policy LA8 ‘Land in Coombe Valley’ of the Land Allocations Local Plan (2015) which allocates a number of parcels in the valley – including the Barwick Road site – for residential development of up to 450 dwellings. The Site further benefits from a number of historic (lapsed) planning permissions for residential development, as explored elsewhere in this Statement.
- 7.2 Whilst a Regulation 18 Draft Local Plan has been previously consulted upon, it is relevant that the emerging Local Plan with policies intended to cover the period up to 2040 is due to be consulted on further during Q4 2022 (Regulation 19 – Submission Draft). This is particularly salient given the proposed allocation of the application Site as a residential development for up to 150 dwellings in the Regulation 19 Local Plan as published in September 2022.
- 7.3 The case is made throughout this Statement that the Site continues to represent an opportunity for a logical location for residential development within the built confines of Dover, interfacing with existing residential development on Barwick Road. The proposed development would create a distinguishable high quality development providing new homes which are sensitively integrated into the community in a sustainable location within the defined urban area for Dover.
- 7.4 The Site continues to represent an opportunity for a logical location for residential development within the built confines of Dover, interfacing with existing residential development on Barwick Road, as reflected in the rationale underpinning the LPA’s allocation of the Site in the adopted and emerging Local Plans.
- 7.5 The Site is within the control of Oliver Davis Homes – a locally-based house builder with an established track record - who are committed to delivering sustainable development. This Site is appropriately located in relation to the services and facilities in Dover with nearby infrastructure supporting access to the wider facilities in the area.
- 7.6 A high level of in-principle support is clear from pre-application engagement undertaken with Dover District Council prior to the preparation and submission of this application, and is clearly demonstrated in the proposed allocation of the application Site as a residential development for up to 150 dwellings under the Regulation 19 Local Plan draft, duly informed by the Council’s own evidence base.
- 7.7 The proposed development has been prepared in line with the provisions of proposed allocation SAP9 of the Regulation 19 Local Plan and its criteria-based policy mechanism. The key planning policies and technical considerations have been identified and examined throughout this Statement, drawing on the suite of technical assessments and plans submitted as part of this application for full planning permission.
- 7.8 There are considered to be no objectionable technical matters arising from this scheme. In this manner, the proposed development would provide for a promptly deliverable form of complementary development in this location, responding well to the visual character of the site and its setting which includes the wider landscape context.
- 7.9 There are considered to be a range of material planning benefits to the proposed development which include, but are not necessarily limited to:
- the redevelopment of this large site of vacant, previously developed land making effective and efficient use of an enclosed land parcel located within defined settlement confines for Dover, related closely to existing residential dwellings;

- the delivery of net 137 new dwellings towards the District’s housing land supply, significant in light of its acute housing need and the long-standing allocation of the Site for residential development;
 - the introduction of new residents who will also contribute towards the vitality of this part of Dover, and the community and support local services and facilities;
 - provision of a net-biodiversity gain;
 - landscape and biodiversity enhancements are targeted at enhancing the contributions of the Site to its landscape setting, including that of this part of the Kent Downs AONB;
 - opportunities to enhance the landscape and ecological credentials of the Site.
 - the provision of construction related services including the applicant Oliver Davis Homes, themselves based locally, providing a significant, albeit short-term, employment and economic boost;
 - new residents to the local area, who will in turn benefit local service and retail related businesses, boosting the immediate local level economy; and
 - contributions achieved through the planning process, among others;
- 7.10 The NPPF and the Government’s growth agenda seek to ensure that sufficient land is available in the most appropriate locations to increase housing supply and support growth.
- 7.11 As concluded across the submitted documents and plans, the proposals are demonstrably deliverable based on the Site assessment work that has been carried out to date, and the masterplan describes a high quality and locally distinguishable new residential offering for Dover, capable of delivering on the long-standing allocation of this Site which has been allocated for development for a period of circa 7 years, having previously benefitted from an unimplemented planning consent for 220 dwellings.
- 7.12 The proposal is considered to roundly accord with the objectives of the development plan for the District and – crucially – with the emerging provisions of its proposed allocation under the new Local Plan currently progressing towards Regulation 19 consultation and submission to the Inspectorate in 2023.
- 7.13 On this basis it is concluded that the application be approved.