

HEARING 3
RESPONDENT REFERENCE 1563
(ON BEHALF OF RAMAC HOLDINGS LTD RESPONDENT REFERENCE 28)

DOVER DISTRICT CORE STRATEGY SUBMISSION DOCUMENT
STATEMENT IN SUPPORT OF REPRESENTATIONS ON BEHALF OF RAMAC HOLDINGS LTD

EXAMINATION INTO THE CORE STRATEGY DPD
HEARING 3 – SPATIAL CONSIDERATIONS: DEAL/SANDWICH

HOBBS PARKER PROPERTY CONSULTANTS REFERENCE: 30032/CSSD/EXAMINATION/2
SEPTEMBER 2009

1 INTRODUCTION

- 1.1 This statement addresses the issues for discussion at Hearing 3 (spatial considerations: Deal/Sandwich) with particular regard to the representations submitted on behalf of RAMAC Holdings Ltd, on the Core Strategy provisions for Sandwich.
- 1.2 Representations were submitted on behalf of RAMAC, seeking modifications to the Core Strategy to secure soundness, with regard to:
- Strategic vision for Sandwich (paragraphs 3.1, 3.2)
 - Strategic proposals for Sandwich (paragraphs 3.71, 3.73)
 - Figure 3.5 Sandwich spatial issues
 - Figure 3.6 key diagram
 - Paragraphs 3.20, 3.21 Hotels
 - Paragraphs 3.22, 3.23 Tourism (omission of reference to Sandwich).
- 1.3 In response to these representations Dover District Council have proposed changes to the Core Strategy; our statement comments on these proposed changes were appropriate below.
- 1.4 Our statement submitted in support of the proposals for modifications referred to above is attached at Appendix 1; to avoid the need to repeat the background information contained in those representations, references made where appropriate to these points in this statement.
- 1.5 Section 2 of this statement sets out an overview of the nature of Sandwich as a settlement, with reference to the Sandwich settlement profile attached at Appendix 2. Section 3 deals with the issues raised for Hearing Session 3; and section 4 sets out our conclusions. Our separate statements for Hearing 2, Context/Overall Strategy/Settlement Hierarchy/Policy CP1 and Hearing 4, Housing Supply/Distribution/Policy CP3, also include our overview of the nature of Sandwich as a settlement, to enable each hearing statement to be read as a stand alone document. Our appendices to the hearing statements for Hearings 2, 3 and 4 are also repeated for the same reason, where relevant to each statement.
- 1.6 The sections of the statement dealing with the issues raised in Hearing Sessions 2 and 3 identify the sections of the Core Strategy (CS) considered to be unsound; which soundness test is considered to be failed; the reason it is considered to fail the relevant test or tests; our proposal to make the Core Strategy sound; and the precise wording of the change sought.

2 OVERVIEW OF SANDWICH

2.1 To assist the Examination we have prepared a short Sandwich settlement profile, which is attached as Appendix 2 to this statement.

2.2 In summary, the key characteristics of Sandwich may be summarised as:

- Important historic centre (acknowledged by DDC, CS reference 2.29)
- Population growth from 1991 (4,164) to 2001 (4,398), latest estimate 2007 (4,920)
- Overall population of Sandwich Ward 6,685 (2007)
- Sandwich has higher proportion of elderly people than district average (23.26% aged 65+ at 2001, district average 18.8%). 2007 estimate similar (24.3% Sandwich, 19.6% district average)
- Major pharmaceutical company (Pfizer), located on the north side of Sandwich, are significant employer in district, subregion and region (3,600 jobs at September 2009)
- Significant grouping of other businesses to the north of Sandwich
- Strong local governance (Sandwich Town Council)
- Extensive range of local services, including shops, restaurants, schools at all levels, social and community facilities
- Golf courses of international (Royal St. George's) and national (Princes Golf Club) importance
- Extensive range of local, social and community organisations
- Excellent public transport links, including rail and bus
- Significant improvements carried to local highway network over last 10 years, including improved access to Pfizer, and existing built development on the north side of the River Stour
- Future transport improvements (final phase of A256/A253 dualling, to the north of Sandwich), now committed.

2.2 Details of the overall planning context for Sandwich were set out in our statement of March 2009, attached at Appendix 1. Since the preparation of this statement, the South East Plan has been adopted; superseding the Kent and Medway Structure Plan 2006.

2.3 The adopted South East Plan confirmed the proposed modification establishing an increase in dwellings for the Dover District Council area to 10,100, for the period 2006 to 2026; the proposed modifications to Policy EKA4, noting that further growth will be encouraged and supported at the large scale pharmaceutical manufacturing and research plant at Sandwich (now subsection v) has been confirmed in the adopted South East Plan; similarly, the proposed modification to Policy EKA6 has been adopted, giving support to high quality proposals for intensifying or expanding new technology, knowledge and scientific sectors at locations including the pharmaceuticals base at

Sandwich and nearby Richborough.

3 HEARING SESSION 3 – SPATIAL CONSIDERATIONS: DEAL/SANDWICH

3.1 This section of our statement addresses the issues with regard to spatial considerations at Sandwich; we may wish to comment on matters arising in relation to Deal, depending on the points raised at the Hearing discussion.

(8) Is the role of Sandwich given sufficient prominence in the CS?

3.2 The vision for Sandwich set out in the section on aims and objectives fails to reflect the important role of the town as a strategic employment location; historic town of national significance; its international and national role as a centre for golf; and as a local service centre. All these factors are referred to elsewhere in the Core Strategy (see, inter alia, 2.76; 3.69; 2.62; 3.68 – 3.73 respectively).

3.3 The Core Strategy also refers elsewhere to opportunities for both development and redevelopment; the need to support and strengthen the service centre role; the opportunity to strengthen the significance of golf to the town; and strategic infrastructure proposals to improve flood protection (see 3.73, 3.70, 3.70 and Table 3.2 respectively). The strategic vision for Sandwich should more accurately reflect both the important role of the town, and opportunities at the town; the reference to “responding to local needs” (paragraph 4, under heading Commentary), and “address more localised needs for employment, housing and community facilities at Sandwich....” (District Objective 4) fail to reflect the important role of Sandwich, and the significant opportunities to be realised. The issue of flood risk affects the majority of the built area of Sandwich, including the historic core; this is of great significance as an issue for the town as a whole, not merely to be considered as a constraint on new development.

3.4 For this reason, this part of the DPD is considered to be unsound, as it is not justified by the evidence base on which the Core Strategy has been based.

3.5 The following wording is suggested to enable the Core Strategy to meet the test of being justified by the available evidence base:

Amend paragraph 4 under heading Commentary to read:

“At Sandwich the strategy will reflect its important role as a strategic employment location, historic town of national significance, international and national focus for golf, and important local service centre.”

(Other text concerning Deal and rural areas unaltered).

District Objective 4 should be amended to read:

“At Sandwich, secure strategic employment growth in accordance with RSS; encourage tourism and leisure associated with the national historic significance, and international and national golf facilities; meet localised needs for housing, utilising brownfield land in preference to Greenfield

land; provide protection against risk of flooding; and strengthen the role of the town as a local service centre.”

- 3.6 Our representations with regard to the analysis of Sandwich, at paragraphs 2.62 and 2.63, and at Sections 3.1 and 3.2, identify a lack of strategic vision for Sandwich. The text at paragraph 2.71 underplays both the significance of Sandwich to the district, and the issues to be considered in formulating the Core Strategy proposals for Sandwich.
- 3.7 With regard to paragraph 2.71, we would suggest the following wording would more appropriately reflect the role of Sandwich, and issues facing the town:
“Given the national significance of Sandwich as a historic town, and international and national significance of its golf courses, the strategy for Sandwich should seek to maintain and develop these roles. The district wide importance of the pharmaceutical industry area, and other areas of employment development, should be maintained and enhanced, and there is scope for regeneration opportunities on land to the north of the River Stour to contribute to the housing, employment and tourism needs of the town.”
- 3.8 We note that the proposed changes to the CS put forward by Dover District Council address, in part, these representations. The proposed wording is an improvement on that presently within the CS. However, we do not feel that the changes proposed go far enough. Our representations sought a reference to “its important role as a strategic employment location”; this reference is considered to be justified, as it accords with the up to date guidance in the South East Plan, a mere reference to “the nearby employment centre” does not reflect the status and importance of this area, within the South East region as a whole.
- 3.9 Similarly, we do not consider that the reference to promoting the employment area to the north of Sandwich is sufficient, within objective 4 in the text box following paragraph 3.2.
- 3.10 Our statement of March 2009 refers to the contribution of golf to the local economy at paragraphs 7.27 and 7.28; seeking additional text referring to the significance of golf to Sandwich, and the local economy, with particular reference to the further golf course which lies to the north east of the town (Princes Golf Course Club).
- 3.11 We note that Dover District Council propose to amend the wording of paragraph 2.62, to refer to the second golf course; however, we do not agree that the suggestion that our proposed wording infers that the two golf courses are of equal standing is correct. The intention of our proposed wording was that the contribution of golf to the local economy and profile of the area should be acknowledged, and accordingly we do not consider that the wording, as proposed to be amended, of paragraph 2.62 to the CSSD meets the test of soundness, of being justified. Our proposed wording is as set out in our statement of March 2009:

“An international golf course lies to the immediate east of the town, and a second golf course of national importance lies to the north-east of the town, both of which are important contributors to the local economy and profile of the area.”

3.12 We note that similar amendment is required to paragraph 3.70.

3.13 Similarly, we consider that the references to the historic town of national significance, an international and national focus for golf are supported by the evidence of the role of Sandwich, in these areas, and accordingly should be included within the text at paragraph 3.1 (district objectives).

(9) Is there justification for housing development on urban extension to the south-west of the town rather than on PDL to north of River Stour? (3.71)

3.14 Planning policy at national, regional and local level supports the development of previously developed land, in preference to Greenfield sites, for new residential development. (Source: PPS3 paragraph 40; Policy H2, Managing the Delivery of the Regional Housing Provision, South East Plan; Objective 7, and paragraph 10.23, Dover District Local Plan 2002; Objective 11, District Objectives, and paragraph 3.30, Core Strategy Submission Document January 2009.)

3.15 Accordingly, there is a clear policy presumption that previously developed land to the north of the River Stour should be developed before and/or in preference to, the proposed urban extension to the south-west of the town.

3.16 The proposal in the CS that an urban expansion area, on Greenfield land, should be promoted to provide sufficient housing to improve choice and meet local needs (3.71, CS) arises from the assertion that potential for urban brownfield development is limited, and that the combination of constraining factors greatly restricts it further (3.71, CS).

3.17 With regard to flood risk, this is referred to as an issue at paragraph 2.63 of the CSSD, referring to Sandwich being set in a predominantly flat landscape.... much of which to flooding, especially from the sea. This reference is repeated at 3.69 of the CS (*“the area is located in a low lying flat landscape that is at risk from flooding”*).

3.18 The significance of flood risk to Sandwich as a constraint is referred in figure 2.11 District Portrait (notation for Sandwich, 4. “flood risk, wildlife habitat and access pose major constraints upon the town”).

3.19 The specific significance of the constraint to the provision of new housing is referred to at paragraph 3.71 of the CS which notes:

“With regard to housing, the Strategic Housing Land Availability assessment has found that the potential for urban brownfield development is limited and that the combination of constraining factors greatly restricts it further”.

It is anticipated that this reference is to the three constraints at figure 2.11, flood risk, wildlife habitat and access.

- 3.20 Further reference is made to flood risk in the context of potential for further jobs growth at the business area to the north of the town (paragraph 3.73 CS), which refers to *“redevelopment of disused sites, provided flood risk and wildlife constraints can be managed”.*
- 3.21 The Core Strategy acknowledges the importance of the preservation of Sandwich (reference to medieval street pattern and built form, above all a major asset to be protected, 3.69, CS); and refers to the provision of additional flood protection for the area between Sandwich and Pegwell Bay (to the north of Sandwich), between 2011 and 2016 (section on infrastructure – table following 3.87).
- 3.22 The Strategic Flood Risk Assessment carried out by JBA Consulting, September 2007 (library document 18/00) sets out an overall commentary on the nature of flood risk in the district, including the Sandwich area; including an analysis of the nature of existing flood protection, and the scale of potential risk.
- 3.23 Further guidance on the coastal flood risk management strategy for the area from Pegwell Bay to Kingsdown was published for public consultation in 2007 (consultation period to 12th October 2007); the consultation document “Planning for the Future” is attached as Appendix 3 to this statement.
- 3.24 The Strategic Flood Risk Assessment identifies the main sources of flooding in the Dover District area as the sea, and, to a lesser extent, the River Dour and the River Stour through Sandwich (paragraph 1.4); at Sandwich the coastline is vulnerable through the joint impacts of fluvial and tidal levels.
- 3.25 This paragraph notes that the most severe flooding would be through either a breach in the coastal defence structure or through the defence structure overtopping.
- 3.26 Paragraph 5 of the Strategic Flood Risk Assessment (SFRA) deals with existing flood defence infrastructure; noting in relation to the Pegwell Bay to Kingsdown coastal strategy:
“Dunes from Pegwell Bay to Sandwich Bay Estate – the dunes system offers protection against flooding at this location, there are no formal man-made defences, they are of good condition and do not require any immediate repair works.”

- 3.27 There are further detailed references to the nature of flood defences on the River Stour at Sandwich, which mostly offer flood protection up to a 1 in 50 year fluvial flood event. Reference is also made to flood protection at the residential development at the Sandwich Industrial Estate – which notes that the defence here comprises a sheep piling wall; the standard for protection for this defence is unknown.
- 3.28 The report also refers to historical records of flooding, from the 1953 tidal flood event, to flooding June 2007; the location of these flood events is shown on the plan at Map B6 of Appendix B to the SFRA. The flood events shown did not affect land north of the River Stour at the Sandwich Industrial Estate, up to Stonar Lake, to the north.
- 3.29 Section 2 of the SFRA deals with the significance of flood risk to determining land use decisions, noting that flood risk is only one of many factors that influence land use decisions, and that the SFRA is designed to assist planners in considering flood risk (paragraph 2.1).
- 3.30 The SFRA then assesses the relative levels of risk to flooding of Sandwich and Dover, in the context of the River Stour Catchment Flood Management Plan (draft, August 2006, paragraph 2.3.3, SFRA).
- 3.31 With regard to the scale of potential flood risk, the SFRA notes that in Dover, 1,037 properties are identified at flood risk in a 1 in 200 year flood event; for Sandwich, 94 properties are identified as at flood risk (paragraph 2.3.3, SFRA).
- 3.32 Sandwich is shown in the SFRA as falling within flood risk zone 3; however, it is important to note that the projections of predicted flood level projections do not consider the presence of any flood defence infrastructure along the coast, hence they show potential tidal flood risk not actual flood risk (paragraph 4.1.3, SFRA, under heading Sandwich and Deal).
- 3.33 The document “Planning For The Future”, Coastal Flood Risk Management Strategy Pegwell Bay to Kingsdown (2007, Appendix 3) sets out recommendations for action concerning management of flood risk for this area. This document contains recommendations for the Sandwich area, which appear to be consistent with the proposal for flood risk management contained in the CS. For Reach 2, Shell Ness to Sandwich Bay Estate, it is noted that the beach provides an existing high level of protection; in the event of a major breach in the dune system during an extreme storm there is a possibility of emergency repairs, including reprofiling of dunes and beach repairs. Under the “do nothing” option which is favoured, the risk of flooding is noted to be acceptably low (page 8).
- 3.34 With regard to Reach 8, Sandwich and Stonar Loop, the preferred option is one of three “improvement” options (page 14); comprising a combination of tidal storage and “online” defences,

including construction of a tidal storage facility in the Broadsalts area. This is noted to include the construction of a spillway, embankments and a drainage facility. The “online” defences will also need to be raised, but not as much as if “online” defences were the only protection.

- 3.35 The location of the tidal storage option illustrated (page 15) accords with the CS figure 3.7 (improvements to green infrastructure network).
- 3.36 This proposal is also noted as providing potential for a 230 hectares wetland/nature reserve to be developed, enhancing the existing network of designated sites and providing additional recreation opportunities; it is noted to be the leading economic and environmental solution (page 14, Planning for the Future, Appendix 3).
- 3.37 It should be noted that the “Planning for the Future” document indicates a higher level of risk to properties in Sandwich, than the SFRA. The analysis of “Reach 8: Sandwich and Stonar Loop” at page 6 refers to some flood damage to property in Sandwich in the past – most notably 1953 and 1983; suggesting that almost 500 properties are currently at risk of flooding, during a tidal event with a 1 in 20 chance of occurring each year (compared to the figure of 94 properties in the SFRA). “Planning for the Future” further predicts that, if no action was taken, by 2107 some 1,400 properties would be affected by flooding to varying degrees during significant tidal events, with nearly 600 properties affected so badly that they would be lost.
- 3.38 The current position regarding flood risk, as it affects Sandwich, may be summarised as follows:
- Existing coastal defences offer a high existing level of protection; no improvement or upgrading is considered necessary, or proposed. There is scope for emergency repairs, in the event of a breach during an extreme storm.
 - Existing defences on the River Stour at Sandwich offer protection against a 1 in 50 year flood event.
 - Existing flood defences provide protection to the new residential development area to the north of the River Stour (see our further comments in section 4 below).
 - The CS refers to improvements to flood risk protection for Sandwich (table following 3.87) between 2011 and 2016.
 - This accords with the proposal for a combination of tidal storage and “online” defences, in “Planning for the Future”, which denotes a proposal for a storage reservoir to the north and east of Sandwich; this is indicated as an area of potential flood storage in figure 3.7, improvements to Green Infrastructure Network, CS.
- 3.39 The protection of the historic core of Sandwich is also noted as a key objective (paragraph 3.69, CS).

- 3.40 Our conclusion is that the level of risk is understood and managed, with further proposals to improve protection against flooding, taking account of potential increase in flood risk levels up to 2100.
- 3.41 It is agreed that flood risk is a matter to be referred to in the Core Strategy, particularly as specific proposals are put forward for its management. However, it is not agreed that the emphasis placed on this issue, with regard to future development opportunities, is supported by the evidence base summarised above.
- 3.42 The Strategic Flood Risk Assessment contains a detailed analysis of potential flood risk concerning land at the Sandwich Industrial Estate at section 5.4.1. This indicates that the area north of the River Stour at Sandwich, together with the majority of the area to the south of the River Stour, comprising on the historic centre of Sandwich, is within Flood Zone 3a. Climate change has very little effect on the extent of the area subject to Flood Zone 3a status, and no effect whatsoever on the land north of the River Stour.
- 3.43 The detailed analysis notes that there are no historical flooding records on the site. The site is noted to be brownfield. Additional information states:
“The site is located within the loop of the River Stour through Sandwich (“Stonar loop”), the flows through which are controlled by the Stonar Cut. The cut is controlled by sluice gates that are opened during times of flood, to allow water to bypass the loop, and drain out to the Pegwell Bay quicker. This effectively decreases the flood risk to properties in Sandwich”.
- 3.44 The likelihood of passing the Exception Test is indicated as low to medium, as long as the site specific FRA provides satisfactory evidence to show that the Stonar Cut, coupled with the existing defences provides adequate protection. The nature of flood risk is noted as overtopping of dunes at Pegwell Bay, resulting in a surge up the tidal Stour, overtopping the defences.
- 3.45 For detailed analysis of likelihood of breach/overtopping gives an indicative range of modelled flood depths of between 0.4m and 1.8m; with a time to inundation from point of overtopping or breach of 5 hours. The land north of the River Stour is not in a Rapid Inundation Zone.
- 3.46 The conclusion notes that a Site Specific FRA is required, which needs to take into account the risk of flooding as a result of a tidal surge, and the SoP of defences. It will be necessary to address both tidal and fluvial flood risk.
- 3.47 As the site lies within the breach/overtopping outline (tidal risk) then flood compensation will be necessary.
- 3.48 The further detailed text refers to an increased Standard of Protection in line with PPS25 (1 in 100

year); requiring a reappraisal of breach scenarios.

- 3.49 The existing flood defences at the Sandwich Industrial Estate residential development area were designed to a 1 in 200 year Standard of Protection; accordingly, these already exceed the level of protection indicated in the detailed analysis section of the Strategic Flood Risk Assessment.
- 3.50 Further detail notes that development should not occur right up to the defences, to allow access for maintenance; this has already been provided for in the development previously permitted. It is also noted that if any development is permitted it will be necessary to ensure that defences are maintained in good condition for the next 100 years; again, provision is made for long term maintenance in the existing planning permission.
- 3.51 The conclusion of the detailed analysis in the Strategic Flood Risk Assessment indicates that alternative sites should be explored in lower flood risk areas. However, we consider that the wider benefits of redevelopment of land north of the River Stour for residential development, in preference to Greenfield development elsewhere, are not outweighed by the need for the site to adopt appropriate flood protection measures.
- 3.52 The feasibility, and financial viability, of provision of such measures have already been established, through the grant of planning permission, and implementation of the first phase of the permitted development.
- 3.53 Our statement submitted in March 2009 deals with the two other factors referred to as constraints by Dover District Council in the CS; these being the reference to the suitability or otherwise of the local road network, and the predominantly flat landscape. Our comments on these two matters are set out at paragraphs 6.8 to 6.11 of our statement of March 2009, and 6.12 to 6.13 respectively. On each matter, we conclude that these are not constraints which render land north of the River Stour unsuitable for redevelopment for housing purposes.
- 3.54 Accordingly, we conclude that the assertion that the potential for urban brownfield development is limited, and further restricted by constraining factors, is incorrect, and not supported by the evidence available within the documents before this examination.
- 3.55 In addition, there are site specific considerations to take into account, which favour the development of land to the north of the River Stour. As we note in paragraph 7.9 of our statement of March 2009, the provision of new housing in this location would also contribute to reducing the significant in commuting movements from the adjoining Thanet District Council area, which are principally related to the substantial employment at the pharmaceutical complex to the north. New housing in this location would also strengthen support for local facilities, in accordance with the objectives of the CS.

- 3.56 Since the submission of our statement in March 2009, further discussions have taken place with Dover District Council, over the suitability of land to the north of the River Stour for residential development, in the context of the SHLAA. The land already with the benefit of planning permission for residential development on the north side of the River Stour is ranked as land suitable, available and deliverable for new housing development, within the next 5 years.
- 3.57 With regard to other land, not currently with planning permission, the ranking falls marginally below the “cut off point” for a site to be considered suitable for residential development. The email exchange attached at Appendix 4 addresses this issue; the response from Dover District Council suggests that the land without planning permission for residential development, SHL074, has not been scored at the higher level, which would be justified by its existing employment use, as part lies within Local Plan Policy AS15, while the other part lies outside. There is also a reference to the scheduled ancient monument located within and covering the majority of the site.
- 3.58 Our further response also attached at Appendix 4 indicates that the land south of the Industrial Estate road considered suitable for residential development falls wholly within the area covered by Policy AS15, and wholly outside the scheduled ancient monument; accordingly, it is considered that the correct score for this sort of site would be 32.5, and hence the site would be regarded as suitable for residential development within the 6 – 10 year period, on the basis of the scoring system adopted by the Council.
- 3.59 Further policy support for the principle of redevelopment of land currently in employment use is given by the provisions of Policy H2(iv) of the South East Plan, which refers to:
“In planning for the delivery of the housing provision, local planning authorities will also take account of the following considerations:..... scope to identify additional sources of supply elsewhere by encouraging opportunities on suitable previously developed sites, this includes appropriate opportunities for change of use of non-residential development sites to secure either mixed use residential development or residential development”.
- 3.60 The proposal for additional residential development would form part of a wider mixed use development proposal for land to the north of the River Stour.
- 3.61 Accordingly, we conclude that there is a compelling case for seeking to provide for residential development on previously developed land to the north of the River Stour, in preference to an urban extension to the south-west of the town, as a matter of principle, without needing to go further to address the site specific considerations affecting the Greenfield site proposed. Accordingly, we proposed the wording put forward in our statement of March 2009 at paragraph 7.13, for a rewording of paragraph 7.31 as follows:
“With regard to housing, brownfield land has been identified in the Strategic Housing Land

Availability Assessment, which is subject to a flood risk constraint. This land adjoins land on the north side of the River Stour, with the benefit of planning permission for residential development, and for which an appropriate flood risk mitigation strategy has been approved. Subject to satisfactory resolution of the matter of flood risk, development of this brownfield area for housing would contribute to local housing needs, and the general housing requirements for the district. If this brownfield area cannot be brought forward for development, or if it is considered, in the context of the Site Allocations DPD, that a greater amount of land for new housing should be identified, then an area of land to the south west of the town represents a potential opportunity for urban expansion. The capacity of this land is, however, limited by a combination of access and landscape impact issues.”

- 3.62 However, in any event, the CS itself identifies the constraints on the proposed urban expansion area to the south-west of the town, which are highlighted as a combination of access and landscape impact issues. The issue of landscape impact is of particular significance on the northern site boundary, where, approaching on Woodnesborough Road, from the west, towards Sandwich, the proposed urban extension presents a rural aspect, with a vista of open countryside rising up to the existing built limits of Sandwich in this location. In addition to views from Woodnesborough Road, views of this area of open countryside are available from the public footpath, running on the east side of the A256 Sandwich bypass; from the bridleway running from north-east to south-west between St. Barts Road, and the northern extent of John’s Green; and from the bridleway between Woodnesborough Road and St. Barts Road.
- 3.63 Views are also available of the proposed urban extension from Dover Road, where the land is seen to rise up to the north, above a foreground of open countryside, from vantage points between John’s Green, and Kumor Nursery.
- 3.64 It is evident from site inspection that neither Woodnesborough Road, nor Dover Road, are in themselves well suited to handling significant amounts of additional traffic, likely to be generated from a strategic urban expansion of the size proposed. Vehicular access onto Dover Road would present access difficulties to the primary road network; as would access to Woodnesborough Road.
- 3.65 The proposed urban expansion is also situated at a greater distance from the town centre facilities including shops and other services; although its relative proximity to the Sandwich Railway Station, and to local schools, is noted. On balance, it is considered that these advantages are outweighed by the greater distance from town centre facilities, compared to land to the north of the River Stour.

(10) Does the CS set out clearly how development to the north of Sandwich will be taken forward? Is this area suitable for mixed use development? Does the reference to a Master Plan in process (3.73) provide sufficient direction for future DPD's?

- 3.66 The detail of how land might be developed to the north of Sandwich is of course a matter for the next stage of the LDF process, the Development Sites Document. However, to assess the suitability of the wording of the CS to provide a Strategic Framework against which future proposals will be addressed, it is necessary to consider the suitability of this area for mixed use development.
- 3.67 The plan at Appendix 5 shows, in outline form, the opportunities and constraints affecting land to the north of the River Stour, up to and including the land at and including Stonar Lake; the schedule at Appendix 5 indicates the key characteristics of the areas outlined.
- 3.68 As noted in the schedule, the land at Area B already enjoys planning permission for the balance of 201 dwellings, of the permission for 303 dwellings already permitted; the other areas of land on the south side of the access road, and adjoining Areas A and B, have potential for future residential development, with the existing flood protection bund extended to run along the south side of the Industrial Estate access road. These areas lie wholly outside the scheduled ancient monument.
- 3.69 The areas north of the Industrial Estate access road, numbered J, K and L, comprise an area with a particularly poor environmental quality at present, in the main, and with significant scope for enhancement, through appropriate development for business and commercial uses, in a manner which does not adversely affect the scheduled ancient monument. Area J, as noted in the schedule, comprises a former listed building, previously with planning permission for office use and car parking; Area L has previously had planning permission for a 50 bedroom hotel.
- 3.70 Subject to the wider issue of potential flood risk (see our earlier comments), and a form of development which does not adversely affect the scheduled ancient monument (which wholly comprises underground archaeological remains), there may also be potential for future residential development in this area.
- 3.71 The land marked I has planning permission for industrial development totalling 5,700m²; the provision of the first part of this development (1,250m²) is linked by a Section 106 Agreement to the commencement of work on the permitted residential development within Area B.
- 3.72 Stonar Lake is marked as Area W; this is currently in use for angling and sailing, and has scope for additional leisure and recreation development. Informal consideration has been given in the past to the opportunity for marina development, the potential linkage via a lock is shown at position O on the plan.

3.73 Accordingly, we conclude that the area to the north of the River Stour, up to and including Stonar Lake, is suitable for mixed use development, for the range of uses specified.

3.74 The CS refers to the business area to the north of the town, which includes the pharmaceutical campus, and land further to the north. It is agreed that this larger area, has potential for employment growth, through redevelopment of sites (both disused, and currently in use); the reference to a master planning process is noted; however, the potential of this area could equally be realised through site specific proposals in the Development Sites Document, and consideration could be given to broadening the wording of the last sentence of paragraph 3.73, which refers to a master planning process.

(11) Should the CSSD make specific reference to tourism in Sandwich?

3.75 Our proposals for a specific reference to tourism in Sandwich (at paragraph 3.21 of the CS) are set out at paragraph 7.29 to 7.34 of our statement of March 2009; we consider that the CS should be amended, as we propose, for the reasons set out in our earlier statement.

(12) Should paragraph 3.21 refer to the potential for hotel development in Sandwich?

3.76 The section of our statement referred to above (paragraph 7.29 to 7.34 of our statement of March 2009) proposed the insertion of an additional sentence after the second sentence of paragraph 3.21, referring to the potential for hotel development at Sandwich. For the reasons set out in our earlier statement, we consider that this amendment should be made to the CS.

4 CONCLUSIONS AND SUMMARY

- 4.1 We consider that the Core Strategy is unsound, on those matters specified in this statement, and our earlier statement of March 2009, on the basis that its conclusions on these matters are not supported by the available evidence.

- 4.2 Accordingly, we seek amendment to the Core Strategy, as sought, and as specified in detail in this statement and our earlier statement of March 2009.