

**HEARING 4**  
**RESPONDENT REFERENCE 1563**  
**(ON BEHALF OF RAMAC HOLDINGS LTD RESPONDENT REFERENCE 28)**

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

**EXAMINATION INTO THE CORE STRATEGY DPD**  
**HEARING 4 – HOUSING SUPPLY/DISTRIBUTION/POLICY CP3**

**HOBBS PARKER PROPERTY CONSULTANTS REFERENCE:           30032/CSSD/EXAMINATION/3**

**SEPTEMBER 2009**

## **1 INTRODUCTION**

- 1.1 This statement addresses the issues for discussion at Hearing 4 (housing supply/distribution/Policy CP3) 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. This section is repeated for the issues for discussion at Hearing 2 (context/overall strategy/settlement hierarchy/Policy CP1) and Hearing 3 (spatial considerations: Deal/Sandwich), as this is relevant to the background for each of the hearing sessions. Section 3 deals with the issues raised in the agenda for Hearing 4; section 4 sets out our conclusions.
- 1.6 The sections of the statement dealing with the issues raised in Hearing Session 4 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 4 – HOUSING SUPPLY/DISTRIBUTION/POLICY CP3

3.1 Our comments on section of the list of topics for discussion at Hearing Session 4 are set out by reference to Agenda Version 2.

**(1) How has the SHLAA (LD19/02) informed the CS approach to housing supply and distribution?**

3.2 We have no specific comments to make on this matter at this stage, but may wish to respond to matters arising in the hearing discussion.

**(2) Issue 2 – Has the SHLAA been publicly available during the submission CS consultation period?**

3.3 We have no specific comments to make on this matter at this stage, but may wish to respond to matters arising in the hearing discussion.

**(3) Issue 3 – Is there robust evidence to support the distribution of housing set out in CP3?**

3.4 With regard to the distribution of housing at Sandwich, the notational allocation of 500 dwellings is identified as a minimum target, rather than a ceiling (paragraph 3.29, CS); this paragraph further notes that once land has been allocated, the targets could be exceeded through additional suitable brownfield sites, redevelopment and conversions and through acceptable increases in the density of allocated sites.

3.5 We consider that this provides sufficient flexibility in the total allocation of land for housing development; the further guidance in paragraph 3.30 of the CS notes that the more detailed level of work required for the Site Allocations Document may result in adjustments to the numbers and proportions, which will be acceptable provided they do not diminish the overall total of housing to be delivered and are consistent with the settlement hierarchy.

3.6 With regard to the evidence base supporting an allocation of the scale proposed at Sandwich, we would highlight the following factors as justifying a level of housing which is considered to be consistent with the existing size of the settlement, while providing the flexibility to allow an increase to a greater number of dwellings, by utilising suitable brownfield sites:

- Status as rural service centre in District settlement hierarchy
- Additional housing provides support for local services, in accordance with Core Strategy objectives (role of Rural Service Centre)
- Wide range of social and community facilities (source: Summary of Settlement Profile for

Sandwich at Appendix 2)

- Additional housing will bring in new households, to help address age imbalance (acknowledged issue for district as a whole, proportion of population aged 65+ greater in Sandwich than district average)
- Highly sustainable location for new development – excellent public transport links, choice of significant employment opportunities at the town
- Major employment location to the north (pharmaceutical company) results in significant in-commuting – additional housing has scope to reduce in-commuting
- Acknowledged high demand for housing (source: SHMA)

3.7 With regard to the evidence base to support the distribution of housing for other settlements in the district, we have no specific comments to make on this matter at this stage, but may wish to respond to matters arising in the hearing discussion.

**(4) Issue 4 – Does the wording in pp3.26, which states that the proportions of housing can be varied, undermine the distribution set out in CP3?**

3.8 We do not consider that the wording undermines the broad distribution set out in CP3.

**(5) Issue 5 – Should the CS include a target for the re-use of vacant housing stock?**

3.9 We have no specific comments to make on this matter at this stage, but may wish to respond to matters arising in the hearing discussion.

**(6) Issue 6 – Has the inconsistency with national and regional planning policies that seek to focus 60% housing development on PDL being justified?**

3.10 We agree that there is insufficient justification for inconsistency with national and regional planning policies that seek to focus 60% housing development on PDL. Our earlier representations in relation to the availability of PDL at Sandwich have been accepted, in part, and the revised figure 3.2 shows an increase in availability of brownfield land (PDL) at Sandwich. The correct position is that a larger amount of PDL is available in Sandwich, and suitable for housing development, as set out in our evidence to Hearing Session 2 and Hearing Session 3.

3.11 The text in paragraph 3.30 of the CS does acknowledge that the detailed work to be carried out for the Site Allocations Document must ensure that maximum use is made of suitable brownfield land in order to reduce the use of Greenfield land wherever possible. We consider that this approach – which is in itself consistent with national and regional planning policies that seek to focus 60% housing development on PDL – should be clearly carried through in the wording of the relevant

sections of the CS. We have made specific reference to the text of paragraph 3.71, (see our evidence at Hearing 3, issue 9, and earlier representations on the CSSD) which would address this issue through the approach to be taken to the identification of suitable land for development at Sandwich.

**(7) Issue 7 – How is this addressed in the Sustainability Appraisal? Is the SA robust in this area?**

3.12 We have no specific comments to make on this matter at this stage, but may wish to respond to matters arising in the hearing discussion.

**(8) Issue 8 – What is to prevent Greenfield sites, which are easier to develop, being developed in preference to more complex brownfield sites, and thus undermining the desired regeneration?**

3.13 As noted at paragraph 3.10 above, our representations with regard to paragraph 3.71 of the CS go to the heart of this issue. We consider that, with regard to Sandwich, specific wording is required to ensure that opportunities for urban brownfield development are fully appraised, before development of brownfield land is permitted. Our suggested rewording for paragraph 3.71 is 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.”*

3.14 We consider that this proposed wording would ensure that Greenfield sites would not be developed, in Sandwich, in preference to more complex brownfield sites.

3.15 Consideration could be given to the use of similar policy wording, either for the district as a whole, or for other specific locations, where it is deemed to be important to address urban sites requiring regeneration.

**(9) Issue 9 – Is the CS sufficiently clear with regard to the reliance on middle/north Deal to meet overall housing supply?**

3.16 We have no specific comments to make on this matter at this stage, but may wish to respond to matters arising in the hearing discussion.

**(10) Issue 10 – What are the overall implications for housing land supply if sites do not come forward at:**

**Middle/north Deal**

**Whitfield urban extension**

3.17 By virtue of its scale, if the sites comprising the Whitfield urban extension do not come forward, then the implications for housing land supply are extremely significant. The implications of land at middle/north Deal not coming forward are less significant, but would be cumulatively problematic, if corresponding with a failure to bring forward the Whitfield urban extension, within the anticipated timescale.

3.18 The implications for housing land supply can be reduced, by maintaining the flexibility currently indicated in the Core Strategy, in the precise allocation of land between different settlements, and the broader allocation to the rural areas, through the Site Allocations Document; in terms of meeting the overall housing land supply requirement, our suggested wording for paragraph 3.71 of the Core Strategy, with regard to Sandwich, would increase flexibility for provision, in that location, while giving priority to the development of previously developed land.

**(11) Issue 11 – Should the figure for provision at Aylesham be reviewed?**

3.19 We have no specific comments to make on this matter at this stage, but may wish to respond to matters arising in the hearing discussion.

**(12) Issue 12 – Is the level of housing proposed for the rural area sufficient to support rural services and communities?**

3.20 The adequacy of the level of housing proposed for the rural area, to support rural services and communities, can usefully be appraised, by some indicative breakdown of the split between new housing for the larger villages (Local Centres, 5 in total); and the other villages, where some form of residential development is considered appropriate. If the 5 Local Centres were to be allocated a notational 150 dwellings each, the balance of 450 dwellings would be spread across 18 villages, giving an average of 25 dwellings for each of the smaller villages. If it were considered appropriate to increase the number of homes for each of the smaller villages to, say 50, this would add a further 450 dwellings, taking the overall total from 1,200 to 1,650. We consider that the present

wording of the Core Strategy would provide sufficient flexibility, to increase the number of dwellings for the rural areas, were this to be considered appropriate. Similarly, increasing the allocation for each of the Local Centres to 200 dwellings each would add 250 dwellings to the overall total; which we consider would be within the flexibility provided by the Core Strategy.

## **4 CONCLUSIONS AND SUMMARY**

- 4.1 Our main conclusion is that the CS should be amended, to make reference to the requirement to look first at previously developed land, at Sandwich, before considering the necessity to allocate new land on Greenfield sites; such wording might usefully be applied to other settlements, within the plan area.