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Planning Statement

**Land South of The Den, Richborough Road,
Sandwich, CT13 9JG**

CLIENT: LAUREN TERRAFOTE

DECEMBER 2023
RD/JJH/17249



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1 INTRODUCTION

- 1.1.1 This Planning Statement has been prepared by DHA Planning on behalf of the applicant, Lauren Terraforte, in support of a full planning application which seeks the erection of 8no. holiday units on land south of The Den, Richborough, alongside associated access, parking and landscaping.
- 1.1.2 This statement provides an overview of the site, the surrounding area and any relevant planning history. The report will review all applicable development plan policies and conduct a planning appraisal, assessing the merits of the proposed development against the context of the site and the policy framework.
- 1.1.3 This statement is to be read alongside the suite of plans and other technical reports submitted in support of the application. A list of the submission documents is set out below. The scope of the application is in accordance with the Council's validation list.
- 1.1.4 The merits of the proposed development are discussed having regard to the context and policy framework. Following consideration, it is subsequently concluded that this proposal is appropriate in planning terms. Accordingly, we request that planning permission be granted.

1.2 BACKGROUND

- 1.2.1 A previous application '20/00248' for the siting of 22.no holiday units was refused due to the impact the development would have on the visual amenity and character of the countryside.
- 1.2.2 Following the refusal of the previous application, a pre-application meeting took place in January 2023 whereby a revised proposal was discussed with both Dover District Council and KCC Highways. It was agreed that subject to further review of more detailed plans, the smaller scheme and amended accessway would likely be acceptable; however, this would depend on the provision of a footway leading up to the site and an assessment of the impact of this on the rural character of the area.
- 1.2.3 The Applicant has considered the reasons for refusal alongside the pre-application response and deems that the alterations made to the proposed development within this application are acceptable and address the concerns raised.
- 1.2.4 This proposal is for the erection of 8.no holiday units, which offers a significant reduction on the 22.no originally proposed.

1.3 APPLICATION DOCUMENTS

- 1.3.1 This statement is to be read in conjunction with the following documents and drawings:

Plans

REFERENCE	TITLE	AUTHOR
DHA/31158/01	Site Location Plan	DHA Urban Design
DHA/31158/02	Existing Site Layout Plan	DHA Urban Design
DHA/31158/03	Proposed Site Layout Plan	DHA Urban Design
DHA/31158/04	Proposed Plans and Elevations Refuse Store	DHA Urban Design
-	Mega Max Pod Plans and Elevations	The Original Pod
H-01 Rev P4	Proposed Access and Visibility Splays	DHA Infrastructure
H-02 Rev P3	Proposed Footway	DHA Infrastructure
T-01 Rev P3	Vehicle Swept Path Analysis Access Arrangement	DHA Infrastructure
	Land South of the Den Designers Response Agreed Action	DHA Infrastructure

TABLE 1.1: PLANS

Documents

REFERENCE	TITLE	AUTHOR
RD/JJH/17249	Planning Statement	DHA Planning
PP-12084837	Application and Forms	DHA Planning
CS/JM/31269	Flood Risk and Drainage Strategy	DHA Infrastructure
PL/LC/17102	Transport Statement	DHA Transport
RSA791	Road Safety Audit	Road Safety Answers
20/00248	Water Quality Impact Assessment (update)	EXO Environmental
PJC.1229.00	Landscape Masterplan	PJC Landscaping
PJC.1229.493.001 Rev -	Landscape Assessment	PJC Landscaping
5361E/23/01	Preliminary Ecological Appraisal	PJC Ecology
5362E/23/01	Biodiversity Net Gain Assessment	PJC Ecology
5363E/23/01	Landscape and Ecological Management Plan	PJC Ecology
29532953-DFL-ELG-XX-RP-EO-13001	Lighting Strategy	DFL
2953-DFL-ELG-XX-LD-EO-13001-S3-P01	Lighting Plan	DFL
-	Letter of Support	Visit Kent

TABLE 1.2: DOCUMENTS

2 SITE AND SURROUNDING

2.1 APPLICATION SITE

- 2.1.1 The site currently comprises a vacant field that has been previously subdivided into smaller paddocks that have been occupied for equestrian purposes. There is a single storey stables/ tack room building located in the north west corner of the field alongside a detached residential property ('The Den'), further to the north.



FIGURE 2.1: SITE LOCATION (COURTESY OF GOOGLE MAPS)

- 2.1.2 According to the Council's Policies Map, the site is not subject to any Conservation Area or AONB designations. The site is situated within both Flood Zones 2 and 3, with the River Stour running on the opposite side of Richborough Road to the east. The land is designated as Grade 2 Agricultural Land. There are no heritage assets within 400m of the site.

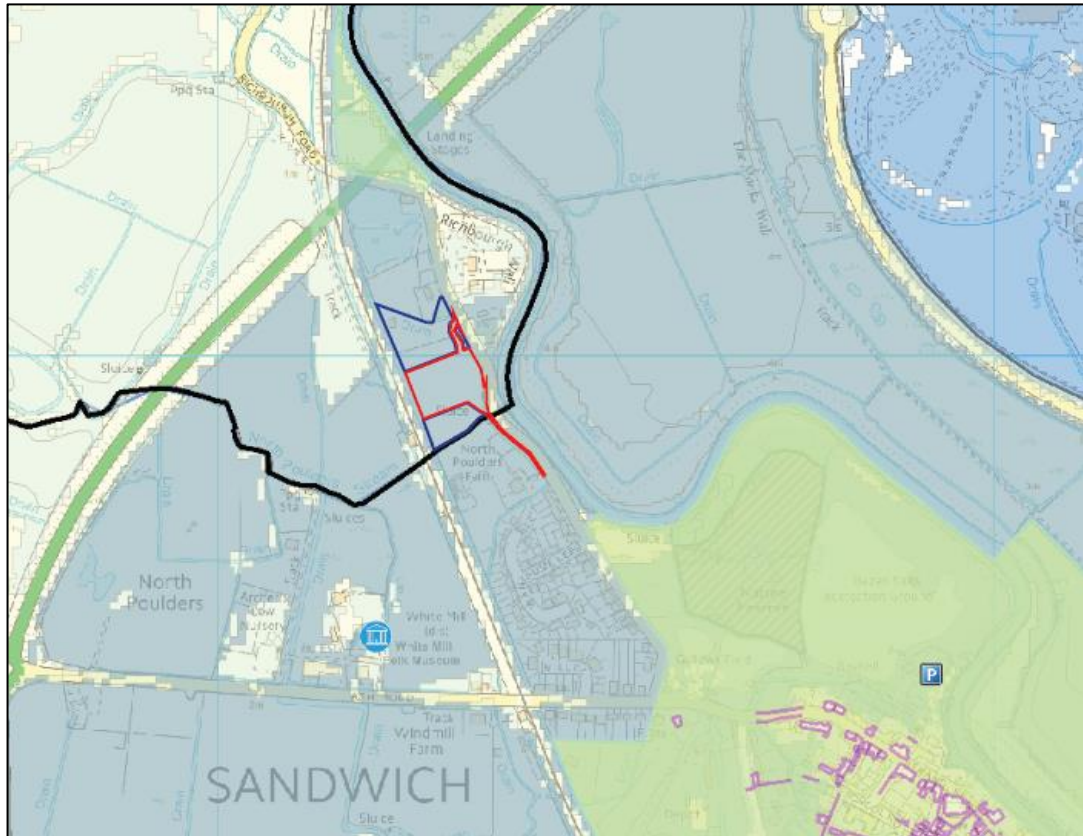


FIGURE 2.2: DOVER DISTRICT COUNCIL POLICIES MAP (SITE SHOWN IN RED)

- 2.1.3 Richborough Road spans the eastern boundary of the site, and there is a railway line along the western boundary. There are two existing access points by way of gated entrances from Richborough Road, to the north and south of the field. There is another field directly to the south of the site, beyond which is further residential development which is within the settlement boundary of Sandwich.
- 2.1.4 Sandwich is designated as a Rural Service Centre in the Council's Local Plan and is located approximately 0.9 miles south of the site. The town centre comprises a wealth of services, including restaurants, takeaways and shops. Sandwich train station is approximately 1.2 miles south of the site (a 27-minute walk) and provides South Eastern services to London and Ramsgate. There are a series of bus stops within the town centre and at the train station that go to Dover and Canterbury. The nearest bus stop to the site is located approximately 0.4 miles south (a 9-minute walk), serving the No. 44 service into Sandwich.
- 2.1.5 The A256 provides a direct connection to Dover when travelling southbound and serves as a wider connection to north, east and west Kent.

2.2 PLANNING HISTORY

- 2.2.1 An online review of the Council's database of planning applications has revealed that the site itself is subject to the following planning history.

REFERENCE	PROPOSAL	DECISION
20/00248	The Change of use of land for the siting of 22no. holiday units.	Refused 9 th June 2022.
19/00997	The Change of use of land for the siting of 22no. holiday units.	Withdrawn 11 th December 2019.
02/01092	Erection of four stables and a tack room.	Approved 5 th November 2002.

TABLE 2.1: PLANNING HISTORY

2.3 PRE-APPLICATION DISCUSSIONS

2.3.1 The National Planning Policy Framework (NPPF) (2023) encourages the take up of pre-application services (Paragraph 40). Early engagement has significant potential to improve the efficiency and effectiveness of the planning application for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community (Paragraph 39).

2.3.2 A pre-application meeting was held in January 2023 with both Dover District Council and Kent County Council Highways. A summary of the responses has been provided below.

DOVER DISTRICT COUNCIL

2.3.3 The pre-application response was received on the 21st February 2023. Discussions at the meeting took place around the previous ground of refusal for a larger scheme with log cabins on the site against the revised proposal for 8 timber glamping pods.

2.3.4 A summary of the pre-application advice provided by the Council is provided below:

- The site is in a reasonably sustainable location and within proximity to services and facilities. An issue that needs to be overcome, however, is accessibility on foot to these services without compromising the rural character of Richborough Road. The Officer re-iterated that a significant concern was raised in relation to the provision of a footway along the road in the refused scheme.
- KCC confirmed that the footway would be needed in any forthcoming application. Further details of their response have been provided in more detail below; however, the footpath would need to connect the site to the existing footpath on the edge of the settlement. The material would also need to be tarmac so the footpath can be adopted. The Officer later confirmed that the footpath could be acceptable provided a landscape scheme is submitted that shows how the impact will be mitigated and

provided the scheme more generally is viewed as acceptable within the context of the rural setting of the site.

- The smaller scheme of 8 units would have a less imposing impact on the character of the countryside by virtue of the reduced number of holiday units and the smaller, less intrusive style of units proposed. The Officer suggested reducing the red line boundary of the site in order to contain the proposed development area.
- Any new application should be supported by an analysis of the landscape impact of the development.
- The Officer raised the fact that under the previous application (20/00248) the technical reports were submitted in a piecemeal manner and there was contradictory information between the different reports in relation to ecology and Biodiversity Net Gain. It was therefore highlighted that any new submission will need to be submitted with an up to date and comprehensive ecological survey to scope out the potential species which may be present on site and assesses the impact of the proposal on the protected sites in this sensitive location. Such reports should detail how impacts on ecology will be avoided, managed or mitigated for. The submission should also set out how BNG would be achieved on site. A contribution is likely to be sought with regard to the Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy as the proposal would fall within the 9km Zone of Influence; details of the tariff are set out in table 11.2 in the Regulation 19 Local Plan.
- The feedback suggested that updated highways surveys would likely be sought by KCC. In addition, due to the site's risk to flooding, it would be prudent to seek advice from the Environment Agency prior to submission.

2.3.5 These points were used to guide the evolution of the design, layout, and other features of the proposed development.

KENT COUNTY COUNCIL HIGHWAYS

2.3.6 KCC Highways attended the site in January 2023. An initial response was received in February 2023 and a second response following the submission of further information was received in May 2023. A summary of the key points has been provided below:

- With regard to the proposed access, the 2.4m x 49m x 48m visibility splays are considered acceptable, in line with the 85th percentile speeds from the ATC speed survey of 29.9mph Northbound and 30.5mph southbound.
- The width of the entrance, exit and access roads shown are wide enough to accommodate a fire tender entering and exiting from both directions.
- The 7 metre set back of the gates as proposed is sufficient to allow vehicles to pull off the carriageway and open them without causing obstruction.

- The plans show the new footpath to be provided along Richborough Road, linking into the current footpath. The path is to be 95 metres long and 1.5 metres wide. KCC confirmed that the surface material must comprise tarmac. The footway will be subject to a S278 Agreement. Plans showing the pedestrian gate at the site boundary and proposed pedestrian route through the site will be required when the application is submitted.
- With regard to refuse collection, the swept path plans demonstrate there is sufficient space for an 11.4m refuse vehicle to service the site. However, plans would need to be provided as part of the planning application that show where the refuse storage area will be located, alongside a refuse collection plan.
- Details of parking were not provided at pre-application stage but will need to be submitted alongside the application. Clarification is needed regarding the type of vehicles that will be using the site, the number of parking spaces, EV provision, cycle parking and storage facilities and whether the applicant is also providing camping pitches on the site.

3 PROPOSED DEVELOPMENT

3.1 DESCRIPTION OF DEVELOPMENT

- 3.1.1 The proposal is for the change of use of land for the siting of 8 no. holiday units along with associated access, parking and landscaping.

3.2 THE FACILITIES

- 3.2.1 The holiday units will comprise timber glamping pods (in particular, the Mega Max Pod as provided by The Original Pod, which was created by Newfoundland Lodges).



FIGURE 3.1: CGI IMAGE OF THE ORIGINAL POD (NEWFOUNDLAND LODGES)

- 3.2.2 The appearance and specification of the pods is provided in the submitted specification sheet and elevations. Each pod measures approximately 6.1 metres in length, 3.1 metres in width and 2.8 metres in height and comprise a wooden structure with an arched roof and glazed doors.
- 3.2.3 The pods accommodate up to 2 adults and 2 children, with a built-in double bed, sofa bed, shower room, kitchenette area and dining area.

3.3 LAYOUT AND ACCESS

- 3.3.1 At pre-application stage the Case Officer requested any forthcoming proposal to offer a more informal, organic layout. As such, the proposal includes pods that are to be arranged in a 'U' shape around a central pedestrian access route. Each pod will have its own footway that leads to the parking area on the eastern side of the site.

- 3.3.2 Both the location and arrangement of the pods, alongside the design of the pods themselves, have been chosen for the development to settle into the countryside and to mitigate any visual impact on the surrounding area.
- 3.3.3 The access and route through the site has also been amended in response to the reasons for refusal. A separate access and egress point will be provided onto Richborough Road which will reduce the level of cutting back required on the respective hedgerow. The route through the site is formed utilising the existing crushed concrete track. The pods will be accessed on foot from the proposed parking area.



FIGURE 3.2: PROPOSED SITE PLAN (DHA URBAN DESIGN)

- 3.3.4 Parking is to be provided on the eastern side of the access track with capacity for 10 cars. 5no. electric charging points will be provided that each serve 2no. spaces. A refuse store has been shown to the northern end of the accessway, allowing for refuse vehicles to utilise the one-way route and collect refuse and recycling on the way through the site. A cycle store is also to be provided on the western side of the accessway. Post and rail fencing will be included on the western side of the access along the section of field where the pods are located.

3.4 LANDSCAPING

- 3.4.1 The scheme has been set within a comprehensive landscape proposal to help the proposed pods integrate into the countryside setting of the site and to help give the proposal an organic feel.
- 3.4.2 The landscape proposals include the 8no. pods that are separated by new tree planting and woodland biodiversity enhancement planting areas – there is a substantial buffer along the southern edge of the site that comprises the same planting area. The landscape proposals include for the planting of 58 new trees across the site. The parking area is bounded by a new native hedge and the parking spaces have been split up by soft landscape.
- 3.4.3 At the entrance to the site, the existing trees and hedging will be retained and new trees are to be planted adjacent to the entrance to soften the visual impact of the scheme from Richborough Road and to lessen the impact of the tarmacked footpath leading up to the site entrance.

4 PLANNING POLICY FRAMEWORK

4.1 OVERVIEW

- 4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 4.1.2 The statutory development plan comprises a number of documents. Of relevance to this proposal is the Dover Core Strategy (adopted February 2010), the Land Allocations Local Plan (adopted January 2015) and saved policies in the Dover District Local Plan 2002. In addition to the development plan, there are other material considerations including the National Planning Policy Framework (NPPF) (September 2023), the draft Local Plan, and other supplementary planning guidance and standards.

Dover District Core Strategy (February 2010)

POLICY	SUMMARY
CP1	Settlement Hierarchy: states that the location and scale of development in the District must comply with the Settlement Hierarchy. Sandwich is defined as a Rural Service Centre, which is a main focus for development in the rural area; suitable for a scale of development that would reinforce its role as a provider of services to a wide rural area
CP6	Infrastructure states that development that generates a demand for infrastructure will only be permitted if the necessary infrastructure to support its delivery is in place or can be provided.
DM1	Settlement Boundaries states that development will not be permitted on land outside the urban boundaries and rural settlement confines shown on the proposals map unless specifically justified by other development plan policies, or it functionally requires such a location, or it is ancillary to existing development or uses.
DM3	Commercial Buildings in the Rural Area states that permission for new commercial development or the expansion of an existing business in the rural area will be given provided that: <ul style="list-style-type: none"> i. It is located at a Rural Service Centre or a Local Centre as designated in the Settlement Hierarchy; ii. It is consistent with the scale and setting of the settlement, or iii. It is at a Village as designated in the Settlement Hierarchy provided that it would not generate significant travel demand and is in other respects consistent with the scale and setting of the settlement. <p>The policy concludes by noting that development should be within rural settlement confines unless it can be demonstrated that no suitable site exists, in which case it should be located adjacent to the</p>

	settlement unless there is a functional requirement for it to be located elsewhere.
DM11	Location of Development and Managing Travel Demand confirms that planning applications for development that would increase travel demand should be supported by an assessment to quantify the type and amount of travel likely to be generated, alongside measures to satisfy the increased demand.
DM12	Road Hierarchy and Development states that access arrangements of development proposals will be assessed with regard to the Highway Network set out in the Local Transport Plan for Kent. Planning applications that involve construction of a new access or the increased use of an existing access onto a trunk road will generally not be permitted without adequate mitigation.
DM13	Parking Provision identifies 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.
DM15	Protection of the Countryside states the development which would result in the loss of, or adversely affect the character or appearance of the countryside will not be permitted unless it is in accordance with an allocation, justified by the needs of agriculture, the rural community or economy, cannot be accommodated elsewhere and does not result in loss of ecological habitats.
DM16	Landscape Character confirms that development that would harm the character of the landscape, as identified through the process of landscape character assessment will only be permitted if it is in accordance with allocations made within Development Plan Documents and incorporates avoidance and mitigation measures, or it can be sited to avoid or reduce harm.

TABLE 3.1: SUMMARY OF APPLICABLE POLICIES FROM THE CORE STRATEGY (2010)

Dover District Draft Local Plan (2040) Regulation 19 Submission (October 2022)

4.1.3 The emerging Local Plan is at the Regulation 20 stage and was submitted for Examination on Friday 31st March 2023. The draft Local Plan sets out a vision for Dover District in 2040 with a series of supporting strategic objectives. **Paragraph 48** of the NPPF confirms that the emerging plans may be given weight according to the stage of preparation for the emerging plan (the more advanced its preparation, the greater the weight that may be given). So, some weight should be attributed to the emerging Local Plan.

4.1.4 Below is a list of draft policies that would be considered applicable to this proposal:

DRAFT POLICY	SUMMARY
SP1	Planning for Climate Change

SP6	Economic Growth
SP14	Enhancing Green Infrastructure and Biodiversity
CC2	Sustainable Design and Construction
CC3	Renewable and Low Carbon Energy Development
CC4	Water Efficiency
CC5	Flood Risk
CC6	Surface Water Management
E1	New Employment Development
E4	Tourist Accommodation and Attractions
TI1	Sustainable Transport and Travel
TI3	Parking Provision on new Development
NE1	Biodiversity Net Gain
NE2	Landscape Character and the Kent Downs AONB

TABLE 3.2: SUMMARY OF APPLICABLE POLICIES FROM THE DRAFT LOCAL PLAN (2040)

4.2 OTHER MATERIAL CONSIDERATIONS

National Planning Policy Framework (NPPF) (2023)

Achieving Sustainable Development

- 4.2.1 Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 4.2.2 Paragraph 8 states achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).

Presumption in Favour of Sustainable Development

- 4.2.3 Paragraph 11 states plans, and decisions should apply a presumption in favour of sustainable development. 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-date, granting permission unless:

1) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

(2) 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 Decision Making

Decision Making

- 4.2.4 In terms of decision making, paragraph 38 states local planning authorities should approach decisions on proposed development in a positive and creative way.

Building a strong, competitive economy

- 4.2.5 Paragraph 81 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

Supporting a prosperous rural economy

- 4.2.6 The NPPF objectives seek to support the development of rural business, paragraph 84 states that, planning policies and decisions should enable:

a) The sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;

b) The development and diversification of agricultural and other land-based rural businesses;

c) Sustainable rural tourism and leisure developments which respect the character of the countryside;

d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship. Promoting sustainable transport

- 4.2.7 Paragraph 110 states that when assessing applications for development it should be ensured that:

a) Appropriate opportunities to promote sustainable transport modes can be – or have been- taken up, given the type of development and its location

b) Safe and suitable access to the site can be achieved for all users

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and

d) Any significant impacts from the development on the transport network, or highway safety, can be cost effectively mitigated to an acceptable degree.

- 4.2.8 Paragraph 111 goes onto states the development should only be prevented or refused on highways ground if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Considering development proposals

- 4.2.9 Paragraph 112 states that all applications for development should create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.

Flood Risk

- 4.2.10 Paragraph 159 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- 4.2.11 Paragraph 167 states that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood risk assessment.
- 4.2.12 Paragraph 168 states that applications for some minor development and changes of use should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote 55.

Conserving and Enhancing the Natural Environment

- 4.2.13 Paragraph 176 states 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. The scale and extent of development within these designated areas should be limited, with planning permission refused for major development other than in exceptional circumstances.
- 4.2.14 Paragraph 180 outlines several principles for local planning authorities to follow when determining planning applications, which have the potential to affect protected habitats and species. Criterion (a) states that if significant harm to biodiversity resulting from a development cannot be avoided (through location on an alternative site with less harmful impacts) adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

- 4.2.15 Paragraph 180 criterion (d) states that development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains in biodiversity.

National Planning Practice Guidance

- 4.2.16 The National Planning Practice Guidance (NPPG) created in March 2014 offers additional support in relation key policies within the National Planning Policy Framework and an online resource. The guidelines offer additional and extensive guidance on issues such as rural housing, waste, water and renewable energy.

5 PLANNING CONSIDERATIONS

5.1 SUMMARY

- 5.1.1 This section will consider whether the application proposal accords with the statutory development plan and, if not, whether any material planning considerations indicate that planning permission should nevertheless be granted.
- 5.1.2 In considering whether the proposal accords with the development plan, it is necessary to consider the following issues:
- a) Principle of development
 - b) Impact on character and appearance of the countryside
 - c) Landscape
 - d) Highways
 - e) Impact on Residential Amenity
 - f) Flood Risk and Drainage
 - g) Water Quality Impact
 - h) Ecology and Biodiversity
 - i) Lighting

5.2 PRINCIPLE OF DEVELOPMENT

- 5.2.1 The NPPF (2023) places a clear importance on the support and growth of rural businesses. Paragraph 84 states that decisions should enable the sustainable growth of all types of businesses in rural areas and should support the provision of rural tourism and leisure developments which respect the character of the countryside. Paragraph 85 further demonstrates that decisions should recognise that sites that can meet local businesses and community needs in rural areas may have to be found beyond existing settlements in areas not well served by public transport. Such development should be supported where it is sensitive to its surroundings and has no negative impact on local roads or amenities.
- 5.2.2 Policy DM1 of the Core Strategy states that development will not be permitted on land outside the urban boundaries and rural settlement confines shown on the proposals map unless specifically justified by other development plan policies, or it functionally requires such a location, or it is ancillary to existing development or uses. Where development is not situated within rural settlement confines, it could be acceptable provided it is demonstrated that no other suitable site exists, in which case it should be located adjacent to the settlement unless there is a functional requirement for it to be located elsewhere.

- 5.2.3 Policy DM3 of the Dover Core Strategy further states that permission for new commercial development, or the expansion of businesses in the rural area, will be given provided that it complies with specific criteria in that it is located in a Rural Service Centre or Local Centre as designated in the Settlement Hierarchy, it is consistent with the scale and setting of the settlement, or it is at a village designated in the Settlement Hierarchy provided it would have no adverse impact on the local highway network. Where development is not situated within rural settlement confines it could be acceptable provided it is demonstrated that no other suitable site exists, in which case it should be located adjacent to the settlement unless there is a functional requirement for it to be located elsewhere.
- 5.2.4 As demonstrated in both the Council's Policies Map and the Delegated Report for the refused application, the site falls outside of any defined settlement boundaries and is therefore considered open countryside in planning policy terms, where new development is generally restricted in accordance with policy DM1 of the Core Strategy. The officer report for the refused application confirmed that due to the location of the development, the proposal is contrary to Policy DM1. Notwithstanding this, the report did note that whilst not compliant with the Local Plan, *"it is recognised that this Policy is largely out of date and that the NPPF is more flexible in its approach. The NPPF is supportive of tourism and this site is close to Sandwich and considered to be in a sustainable location, under the NPPF the principle could be considered acceptable."*
- 5.2.5 The report then demonstrates that the proposal also fails to comply with Policy DM3 as no alternative site was identified in the application. Again, the Case Officer confirmed that *"Paragraphs 83 & 84 of the NPPF are more flexible with regard to the siting of tourism facilities to support the rural economy, but not at the cost of impact on the countryside"*. The report later confirms that the proposal is considered to be unacceptable with reference to the impact on the landscape and character more generally.
- 5.2.6 Referring back to the overall principle, in accordance with the officer report, it is clear that the policies contained in the development plan are out of date having been adopted in 2010. The NPPF conversely offers more flexibility with regard to the location of new development in the countryside, noting that sites that meet the needs of rural businesses and communities are often situated beyond settlement boundaries. In this instance, the site is just outside of the settlement boundary of Sandwich (approximately 200 metres), with the centre of Sandwich within walking distance of approximately 1 mile to the south. As such, the location of the site is considered suitable for the rural business. The creation of a small rural business in a sustainable location, which supports local tourism needs, is considered to meet the needs of the local community in line with the aspirations of the NPPF.
- 5.2.7 With regard to the countryside location of the development, it is noted that it is not uncommon to find tourist accommodation in rural areas, outside of existing settlement confines. As demonstrated at pre-application stage, the Sandwich Leisure Holiday Park is the only other camping / caravan park close to Sandwich. The park is of a significantly larger scale than that proposed and appears to have been constructed in the 1980s. Given the space and environment needed for such a use, it is clear that land in a rural location is of a necessity. In addition, an

application has been submitted for the expansion of the White Mills Wake & Aqua Park (ref. 23/00420) which is pending consideration. Again, this is located on land outside of Sandwich and also comprises a large number of camping pitches that are intended to specifically support the expansion of the wake park. With this in mind, it is clear that a countryside setting is suitable for a development of this nature.

- 5.2.8 In line with the ambitions of the current Development Plan and visions for the Regulation 19 Draft Local Plan, and by comparison to limited surrounding tourism enterprises, this application presents an opportunity for the creation of a smaller scale, niche and locally based business whereby it will encourage visitors to enjoy longer stays within the district, providing a significant contribution to the Council's tourism industry and local rural economy without having a detrimental impact on the surrounding area with regards to character, highways or other material planning considerations. Clear support was provided in the original application once the key consultee comments had been overcome (such as highways and ecology). This was demonstrated through the removal of the objection from the Parish Council, the letters of support and the Visit Kent supporting letter which reiterated their support for the provision of additional tourist accommodation with regard to evidenced need of such accommodation within the local area.
- 5.2.9 In addition to the above, the Draft Local Plan has been progressed further than it was at the time of the original application and pre-application meeting as it has now been submitted to the Secretary of State for examination. Therefore, it now holds some weight in the determination of this application. With this in mind, the draft Local Plan demonstrates strong support for the delivery of more tourist accommodation across the district. Draft Policy E4 in particular states that proposals for self-catering tourism accommodation (including camping, glamping, lodges, huts and pods) will be supported across the District subject to a set of criteria. That is, that the scale and design is compatible with local character, the level of activity generated is compatible with the character and quality of the countryside, that it would conserve and enhance the landscape character and biodiversity and wouldn't be seen as an unacceptable intrusion in open countryside, that it would not have an adverse impact on living conditions of adjoining residents, and that appropriate provision has been made for parking and access. In this regard, Policy E4 is clearly more flexible in terms of the location of new tourism development by not steering such schemes to existing settlements, in line with the NPPF.
- 5.2.10 With the wording of the NPPF and draft Local Plan in mind, there is a clear need for additional overnight visitor accommodation in the district. The form of development proposed, by way of a small-scale holiday let scheme comprising timber huts (therefore more aligned with glamping rather than camping), will help meet the need for visitor accommodation in the district in a way that differs from the limited number of surrounding large scale commercial campsites. This should be taken as a benefit when considering the planning balance of the application.
- 5.2.11 Overall, whilst the proposals are contrary to the provisions of the adopted Local Plan, it is clear that this is now out of date with regard to tourism and the application does align with the wording of the NPPF alongside the Draft Local Plan.

The principle of development will therefore need to be weighed against other material considerations as set out later on in this report.

5.3 IMPACT ON CHARACTER AND APPEARANCE OF THE COUNTRYSIDE

- 5.3.1 Paragraph 126 of the NPPF emphasises that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development and creates better places in which to live and work.
- 5.3.2 In line with the requirements of the NPPF, Policy DM15 of the Core Strategy states that development that would result in the loss of, or adversely affect the character or appearance of the countryside will only be permitted if it is in accordance with specific criteria and provided that measures are incorporated to reduce any harmful effects on countryside character. Moreover, Policy DM16 confirms that development that would harm the character of the landscape will only be permitted where it is in accordance with wider development plan policy and where it is sited to avoid or reduce harm, and / or incorporates design measures to mitigate the impacts to an acceptable level.
- 5.3.3 Draft Policy PM1 places importance on the delivery of high-quality development that is suitable within the context and identity of a place. Draft Policy E4 further highlights that proposals for overnight accommodation (such as camping, glamping or pods), will be supported across the district based on a series of criteria, most particularly relating to the impact of development on the character, fabric and appearance of the local area, visual amenity and conservation of landscape character.
- 5.3.4 As demonstrated previously, the site is located to the north of Sandwich in a field that has been occupied for equestrian use. The site is bounded to the east by Richborough Road, to the west by the railway track, to the north by the curtilage of a residential dwelling that forms part of the site, and to the south by more dwellings which lead into the settlement boundary of Sandwich. There is a car scrap yard adjacent to the site on the opposite side of Richborough Road. The dual carriageway for the A256 is also situated to the north of the site. Richborough Road is a rural lane that has areas of tall hedgerow and areas of shorter hedgerow and fencing. The hedgerow has been cut and reduced in height as part of planned maintenance works. In its existing state, it is also relatively sparse, with thinned areas and lengthy stretches of cover that extend only a minor extent above ground level thereby contributing a limited degree to the context of the rural lane, or towards screening the site. Richborough Road is a Promoted Route as identified by Kent County Council, and forms part of the Saxon Shore Way.
- 5.3.5 The reason for refusal for the 2020 planning application related to the impact of the development on the character of the wider area, as follows:

"The proposed development would cause harm to visual amenity and the open character of the countryside in this location due to the siting, scale and density of the development together with the provision of the visibility splays and extended footpath that would involve the loss of vegetation along

a rural road. Accordingly the proposal would be contrary to policies DM1, DM15 and DM16 of the Dover District Council Local Plan and paragraphs 8 & 174 of the NPPF."

- 5.3.6 Providing reasoning to the refusal, the Officer Report noted that there is a concern that the development would "fail to respect the character of the locality and cause harm to the intrinsic character and beauty of the countryside".
- 5.3.7 The number of units and density of the development was also considered to have an "urbanising" impact on the rural area and would cause the "loss of an important area of green space which acts as a buffer around the built-up area of Sandwich". Furthermore, the creation of a footpath connecting the site to Sandwich (which was required by KCC Highways and referred to later on in the Officer Report as a positive aspect), was also considered to allow the "built environment to creep out into the countryside". As such, the application was considered contrary to the aforementioned policies, DM15 and DM16 of the Core Strategy.
- 5.3.8 The revised scheme has been prepared on the basis of pre-application conversations with both Dover District Council and Kent County Council Highways (a summary of which has been provided in Section 2.3). Through the discussions it was made clear by KCC that a tarmac footpath connection would need to be provided to connect the site into the settlement to the south. The Council confirmed that the reduced scheme of eight units would be more sensitive and appropriate in view of the setting of the site, but that the impact of the development would need to be mitigated through landscaping.
- 5.3.9 As shown in Section 3, in line with the pre-application proposal, the revised scheme offers a significantly lower number of units, at eight compared to 22. Additionally, the siting of the units has been amended so that they would be situated in the northern half of the fields in a more contained and less visually prominent location, and the type of accommodation has been revised so that instead of comprising single storey lodges they will instead include timber glamping pods that are smaller and more sensitive with regard to the countryside setting of the site. In addition, the level of hardstanding across the site has been significantly reduced, through which the existing crushed concrete track will be used to form the route through the site alongside the parking area. The pods will then be accessible across the field on foot and have been organised in a more organic, less formalised layout, that will be more appropriate to the countryside setting.
- 5.3.10 The concerns raised by the Case Officer in relation to the access and cutting back of the hedgerow on Richborough Road has been addressed by changing the entry sequence to a one way through route with the entrance to the south and exit to the north, re-utilising former accesses. This approach provides visibility splays that have been accepted by KCC Highways at pre-application stage, but that also prevent the loss of hedgerow in response to the Case Officer's comments to ensure the development would not pose a threat to the character of the rural road or countryside more generally.
- 5.3.11 The footpath has been provided along Richborough Road in accordance with KCC's requirements. The officer report for the refused application highlighted that the

footpath would result in a perception of urban sprawl that would increase the level of harm the development would have on the countryside. At pre-application stage it was agreed that the footpath would need to be provided for the scheme to come forward, so as long as it is mitigated by landscape then it should not result in a substantial level of harm. It is noted – and was raised with the Case Officer at pre-application stage – that due to the restricted width of the road, footpath and bank on which the footpath will be situated alongside the fact that the road is not within the applicant’s ownership and will need to be adopted by KCC, additional landscape is not possible along the road itself. However, as described in more detail below, additional landscaping has been provided within the field that will mitigate against the impact of the scheme more generally.

- 5.3.12 In addition to the above, the Officer’s Report insinuates that the site forms an important green buffer that is wholly rural in character forming part of the untouched landscape surrounding Sandwich. However, it does not acknowledge the full picture of the physical context of the site. Whilst the report notes the presence of Richorough Road, it does not make reference to the visual presence or urbanising impact of the adjacent railway on the western side of the site, or the bypass for the A256 to the north. Nor does it report the presence of the car scrap yard to the east, the servicing entrances for the River Stour or the number of residential dwellings situated in close proximity to the field. In this context, it is not considered that the site is strictly untouched or rural as the report suggests.
- 5.3.13 With the above in mind, the impact of the scheme in the wider context of the site is therefore considered negligible with regard to the countryside setting of the site. Conversely, the proposed landscape as described in more detail below will provide a significant enhancement to the site as existing.

5.4 LANDSCAPE

- 5.4.1 The pre-application advice outlined in section 2.3 of this report highlighted the need for thorough analysis of the proposal’s impact on the surrounding landscape. As such, a Landscape Appraisal (LVIA) is submitted within the application. The findings of the assessment are outlined below:
- Due to the present land use [intensive equestrian grazing], the site is considered to be [currently] in a poor condition. Views of the concrete A256 flyover, associated traffic noise and intermittent mainline trains [to the western edge] mean the site is considered to be of low landscape value. Moreover, to the eastern edge, lies a public highway: Richborough Road, to the north-east is a large vehicle breaking / scrapyard.
 - Whilst it is acknowledged there would be adverse landscape character effects as a result of the proposed scheme, it is generally accepted this is inevitable with any new development to a ‘green field’ site.
 - The proposed development site has an existing constrained character which would be retained and enhanced with new planting to the edges.

- It is considered adverse impacts would be largely constrained to the immediate context of the proposed development site and new planting would offer potential biodiversity and green infrastructure enhancements.

5.4.2 Overall, the proposed development scheme can be accommodated to land west of Richborough Road without undue harm to the surrounding landscape character and visual amenity.

5.5 HIGHWAYS

- 5.5.1 Paragraph 104 of the NPPF seeks for development to mitigate against potential impacts of development on the local highway network. Development should promote walking, cycling and public transport, and the patterns of movement, streets, parking and other transport considerations should be integral to the design of a scheme.
- 5.5.2 Policies DM11 and DM13 of the Core Strategy relate to highways and transport and confirm that development should result in no adverse impact on the local highway network. New development that would increase travel demand should be supported by a systematic assessment to quantify and justify the type and amount of travel proposed.
- 5.5.3 A Transport Statement by DHA Transport has been prepared and accompanies the application. The report highlights that following a review of national and local transport planning policy, no conflicts are envisaged. The site enjoys ready access to the primary highway network and is located within a reasonable walking distance of local services, facilities and public transport nodes, which will provide future users with realistic opportunities for non-car travel.
- 5.5.4 A total of ten on-site vehicle parking spaces will be provided; all of which will be equipped with electric vehicle charging capability. This is seen to be compliant with the standards laid out within the Dover District Adopted Core Strategy (2010) and Approved Document S of the Building Regulations, respectively. Additionally, eight cycle parking spaces will be provided in the form of vertical cycle stands, which is seen to be compliant with the standards prescribed by the Kent and Medway Structure Plan: Supplementary Planning Guidance 4 (SPG4).
- 5.5.5 From a review of Personal Injury Collision data for the local highway network, it has been demonstrated that the proposed development is unlikely to materially exacerbate the existing highway safety record.
- 5.5.6 Access to the site will be achieved via a one-way arrangement, with the existing southern access point being treated as entrance-only and the existing northern access point being treated as exit-only. Both access points are to be widened to 4.8m and provided with gates. Compliant visibility splays can be provided from the 'out-only' access and the associated Stage 1 design has been subject to an independent Road Safety Audit.
- 5.5.7 The proposed development will attract approximately 28no. vehicle movements on a peak Saturday. This level of trip generation is not expected to have a 'severe'

residual impact on the local highway network, in line with Paragraph 111 of the National Planning Policy Framework.

- 5.5.8 Given the above, it is concluded that the proposed development should not have any adverse transport impacts and therefore there should be no sound transport-based objections to the planning application.

5.6 IMPACT ON NEIGHBOURING AMENITY

- 5.6.1 As identified in the Officers Report for the previously refused application, there are no residential properties other than the applicant's that directly adjoin the site. Whilst visitors may walk along Richborough Road on their return from Sandwich, it is not considered that this would have any detrimental impact on neighbouring amenity.
- 5.6.2 Given the reduced number of units, it is considered that the minimal impact to residential amenity considered through the last application, would be reduced further.

5.7 FLOOD RISK AND DRAINAGE

- 5.7.1 The site lies within Flood Zone 3 and is therefore regarded as having high probability of flooding; thus, a Flood Risk Assessment is provided alongside this application. The report outlines that the glamping pods are to be founded on a concrete slab and will be elevated 0.6m above the existing ground level.
- 5.7.2 The applicant will sign up to the Environment Agency Advanced Flood Warning Service. This is operated by an automatic pre-recorded message which is sent to a landline telephone and to a mobile phone number. The system is designed such that the call has to be acknowledged by the receiving person. This will provide the opportunity for the occupier to evacuate the property in the event of a flood.
- 5.7.3 In terms of drainage, the application is accompanied by a Drainage Strategy which provides a detailed description of the foul and surface water drainage systems for the proposed development. Sustainable Urban Drainage (SuDS) techniques will be used to deal with the surface water generated by the development. This will replicate the existing drainage regime by dealing with the surface water at source, to prevent increasing the risk of downstream flooding.
- 5.7.4 The report highlights that surface water for the site will drain via infiltration which will comprise of porous paving.
- 5.7.5 Foul drainage from the development will be via a system of gravity sewers into a package treatment plant which will discharge to ground.
- 5.7.6 It is important to note that The Environment Agency raised no objections on the grounds of flooding in the previous application (20/00248), with the current proposal being a lot less intrusive than the previous application.

5.8 WATER QUALITY IMPACT

- 5.8.1 An updated water quality impact assessment has been provided alongside this application which indicates that, based on the current understanding of the project, the cumulative impacts will not significantly affect the various elements considered of the Stour Marshes operational catchment. The project is very unlikely to impact the water body status; no deterioration, or prevent the potential to achieve, future good status. Nor is the project likely to impact the designated sites or their features.
- 5.8.2 It is recommended that reed (phragmites) in the North Poulder Stream and associated ditches are maintained and cut annually between December and March in order to remove excess nutrients from the system. The reeds should be removed from site in order to allow this to have effect.
- 5.8.3 It is furthermore recommended that the sewage treatment plant is operated, maintained and serviced according to manufacturer's standards to ensure its treatment process is preserved at the appropriate standard.
- 5.8.4 The site lies outside the Stodmarsh catchment area.

5.9 ECOLOGY AND BIODIVERSITY

ECOLOGY

- 5.9.1 Policy CP7 of the Core Strategy states that new development should ensure that the integrity of the existing green infrastructure network will be protected and enhanced wherever possible.
- 5.9.2 A Preliminary Ecological Appraisal has been undertaken by PJC (dated October 2023) to identify potential ecological constraints and opportunities associated with the site. The findings are outlined below:

Bats (Foraging and Commuting)

- 5.9.3 The Site has been identified as having habitat suitability to support commuting and foraging bats. It is recommended that a sensitive lighting strategy should be implemented throughout the construction and operational phases of the development.

Nesting birds

- 5.9.4 The site has been identified as having the potential to support nesting birds. It was recommended, therefore, that habitat clearance works should be undertaken outside the main nesting bird season. Should this not be possible, all trees and shrubs must be inspected by ecologist to determine the presence/absence of any nesting birds immediately prior to clearance.

Reptiles

- 5.9.5 The Site was identified as potential to support reptiles providing foraging, commuting, basking and hibernating opportunities. It was recommended that all works should be carried out under a Precautionary Method of Works.

Badgers

- 5.9.6 The Site was considered to provide some limited foraging and commuting opportunities for badgers.
- 5.9.7 A pre-works survey was recommended to be undertaken immediately prior to any construction works commencing to ensure no new setts have become established. Further mitigation requirements would depend on the survey results.

BIODIVERSITY NET GAIN

- 5.9.8 Paragraph 174 (d) of the NPPF notes that new development should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- 5.9.9 The adopted Core Strategy does not have a specific policy base for Biodiversity Net Gain, albeit does require new development to protect and enhance the green infrastructure network (Policy CP7). Policy SP14(d) of the Regulation 19 Draft Local Plan, albeit carrying limited weight, states that all development must avoid a net loss of biodiversity and will be required to achieve a net gain above the ecological baseline.
- 5.9.10 A Biodiversity Net Gain (BNG) Assessment has been prepared and submitted with the application (PJC, October 2023). The BNG Assessment provides an assessment the calculation of biodiversity units pre- and post-development. This assessment has been used to inform the Landscape Masterplan, also submitted alongside the application.
- 5.9.11 The report notes that in relation to the pre-development condition of area-based habitat units, a total of three broad area-based habitat types were recorded within the Site during the extended Phase 1 habitat survey. These other grassland, ruderal and urban development (sealed surface). This gives rise to a total of 4.71 area-based habitat units.
- 5.9.12 The Site baseline also generates a total of 0.51 linear-based habitat units comprising of one broad linear-based habitat type.
- 5.9.13 Regarding the post-development scenario, a total of three semi-natural and one artificial broad area-based habitat types are proposed within the Site, including developed land (sealed surface), mixed scrub, individual trees and other neutral grassland. This gives rise to a total of 3.11 area-based habitat units, most of which have been generated by significant native tree planting. A single linear based habitat type, in the form of native hedgerow is proposed within the Site. This gives rise to 3.11 linear-based habitat units.

5.9.14 Overall, the development will result in a total net gain of 6.73 area-based habitat units and 0.71 linear-based hedgerow units across the Site. This in total gives rise to a 43.03% area-based habitat unit net gain, and a 40.02% net gain in linear based habitat units. Therefore, given the above, the development will provide a significant net gain that substantially exceeds that required by both the NPPF and the adopted and emerging Local Plan.

5.10 LIGHTING

5.10.1 A Lighting Strategy has been prepared and accompanies this application. A summary of the findings is detailed below:

- The Lighting associated with the Proposed Development shall be designed in accordance with the Lighting Strategy for the Application Site.
- This lighting strategy has been written in accordance with the relevant industry guidance and local policies to ensure it is unlikely to give rise to obtrusive light with the potential to
- Through the application of this lighting strategy sensitive receptors will not be adversely affect by obtrusive light.
- This lighting strategy has demonstrated the controlled and considerate lighting will not cause an adverse effect on the wider environment. As stated in the PEA ecology report, lighting has been installed at minimum levels, at a warm colour temperature and with timers or movement sensors to ensure lights are not on when not in use.
- Through careful design and mitigation, this Lighting Strategy ensures the lighting installation at the proposed development will be in accordance with Guidance and Local Policy.

6 PLANNING BALANCE

6.1 OVERVIEW

- 6.1.1 Paragraph 11(d) of the NPPF states that where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, applications should be approved unless policies in the NPPF that protect areas or assets of importance provide a clear reason for refusing the development or if any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the framework taken as a whole.
- 6.1.2 As demonstrated in the preceding chapters, the Council have identified through the Officer Report for the refused application on this site, that the policies most important in determining this application (for example, Core Strategy Policies DM1, DM3 and DM15) are to a greater or lesser extent in tension with the NPPF and therefore out of date. The Council's adopted Local Plan dates back to 2010. The Council are in the process of undertaking a review of their Local Plan the stage at which the revised Local Plan is at (Regulation 20) means that it holds some, but still limited weight in the determination of this application. For this reason, the tilted balance applies.

6.2 PLANNING BENEFITS

- 6.2.1 The proposal seeks to provide a small-scale proposal comprising pod-style holiday let accommodation that will facilitate the improvement of tourism accommodation in the district. The reduced scheme has been shown to be less formal and more organic in character than the original proposal, thereby being more suited to a rural location.
- 6.2.2 As demonstrated throughout the report, both the Council's current Local Plan and the draft Regulation 19 document demonstrate that the Council seek to deliver more tourist accommodation. Paragraph 2.45 of the Core Strategy for example notes that "tourism is under-achieving in potential", with visitor spend lower than elsewhere in Kent and longer overnight stays being limited. In view of this, and in the absence of allocated sites in the Development Plan for tourism uses, it is self-evident that windfall sites like this are required.
- 6.2.3 The draft Local Plan provides clear support for the provision of new tourism accommodation in the form of campsites, glamping, pods or lodges. It also demonstrates why out of centre locations are more suitable for such accommodation. In view of this, it is considered that the development of a small-scale holiday site will meet identified needs in the adopted and draft Local Plan, providing a clear benefit for the local community and wider area. There was clear support in the previous application shown by the withdrawal of the objection from the Parish Council, supporting comments from neighbouring occupiers and the supporting letter from Visit Kent.

- 6.2.4 The submitted scheme demonstrates how careful consideration has been taken in the preparation of the proposal, particularly with regard to the landscape scheme to ensure that the visual impact of the development from the locality and more generally on the countryside setting of the site is minimised. In this regard, the smaller scheme represents the opportunity to enhance the existing site, which currently serves limited purpose for the local area.

6.3 HARM

- 6.3.1 The reason for refusal for the 2020 application identifies that the previous development would result in a significant level of harm to the countryside setting of the site given the number of holiday lodges, cutting back of the hedgerow on Richborough Road and perception of urban sprawl. The more recent pre-application response provided in response to the submission of the smaller scheme also identified the potential for the development to result in a level of harm to the character of the wider area and mitigation was considered necessary to reduce this to an acceptable level.
- 6.3.2 As shown throughout the report, the revised scheme is significantly smaller than the original application (being eight rather than 22 units). The proposed pods and layout of the development is also more organic and sensitive to the context of the site. Amendments have been made to the entry sequence to prevent the hedge from having to be cut back to the same degree and the footpath along Richborough Road (as required by KCC Highways) has been designed to be as small as possible. Landscape has been provided within the site to provide a buffer between the development and wider area, and to prevent the perceived impact of urban sprawl. As noted within the assessment, in view of the context of the site which is already dominated by existing built form and infrastructure, it is not considered that a small-scale development of this nature would result in any harm.
- 6.3.3 Whilst the adopted development plan seeks to locate new development within existing settlement confines, it has been identified that there are no locations within Sandwich that would be suitable to support a development of this nature. Both the NPPF and Draft Local Plan recognise that developments comprising camp sites, lodges, glamping or pods are more suited to countryside locations. In this instance, it has been demonstrated that whilst being located in a countryside location, the development is in close proximity to the settlement boundary of Sandwich. It is within walking distance from the town centre (facilitated by the new footpath) and local transport connections and as such is considered to be within a sustainable location.
- 6.3.4 With the above in mind, it is considered that there would be little harm caused by the proposed development, that would most certainly not be at a level that would significantly or demonstrably outweigh the benefits of a tourism development in this location.

6.4 BALANCE

- 6.4.1 Having regard to the matters outlined above, it is clear that the benefits of the proposal are genuine and tangible and directly respond to the core objectives of

both the adopted development plan and draft Local Plan, namely sustainable economic growth in rural locations and enhancement and improvement on provision of tourism accommodation that provide direct benefit to the district without causing any adverse impact upon the character of the area or neighbouring amenity.

- 6.4.2 It is therefore considered that the benefits of the development are substantial and are considered to outweigh any harm.

7 CONCLUSIONS

7.1 SUMMARY

- 7.1.1 This statement is submitted on behalf of Lauren Forte, in respect of a full planning application for the erection of 8no. holiday units on land south of The Den, Richborough, alongside associated access, parking and landscaping.
- 7.1.2 The site is located outside of any defined settlement boundary and so is located in the countryside in planning policy terms, where the Dover Core Strategy seeks to restrict development. However, development plan policies DM3 and NPPF paragraph 81, 84, and 85 support the expansion of existing economic development in the countryside, and acknowledge that businesses should be enabled to grow, develop and modernise. The Draft Local Plan (Policy E4) places clear support toward the provision of tourism accommodation in the district and is more flexible as to the location of such development. The change of use of the site will allow the applicant to diversify their business operations, whilst providing wider benefits to the tourism industry around Sandwich and Dover more broadly.
- 7.1.3 This application proposal seeks to overcome the reason for refusal of the recent application (ref. 20/00248) which was refused due to the impact the development had on the countryside and the area more generally. Overall, the revised development proposal offers a development that is of a sensitive scale and design that would pose no threat or harm to the surrounding countryside or area more generally. The submitted LVIA provides the Council with comfort that the proposals won't amount to significant harm to the countryside and surrounding area. As demonstrated in the preceding section, it is considered that on balance, the benefits of the development significantly and demonstrably outweigh any harm.
- 7.1.4 The potential traffic impacts of the scheme have been suitably assessed by DHA Transport and their Transport Statement demonstrates that the levels of vehicle movements associated with the proposed use will be of a scale which will be appropriate in the context of the surrounding highway network.

7.2 CONCLUSION

- 7.2.1 Given the above, we consider the new proposal to overcome the reason for refusal of the 2020 application. The proposed development is considered to accord with the relevant planning policy and there are no material considerations that justify the refusal of planning permission or outweigh the benefits of the development.
- 7.2.2 We therefore formally request that planning permission be granted, subject to appropriate conditions.