



DESIGN & ACCESS STATEMENT

Residential development, Land at High Knocke, Dymchurch, Kent, TN29 0PU

April 2024

RDA
ARCHITECTS

Submission Documents

This Design and Access Statement has been prepared by RDA Architects on behalf of Redbridge Estates Ltd in support of an outline planning application for the proposed residential development of 125 dwellings with affordable housing, associated infrastructure and landscaping including public open space on land at High Knocke Farm, Dymchurch with all matters reserved.

DHA Planning have prepared a planning statement to accompany this document and the planning application discussing the proposal in a policy context.

This design and access statement (DAS) has been prepared in accordance with the guidance produced by CABE. It sets out the background to the proposals, an analysis of the application site and an explanation of the design process that has informed the evolution of the development proposals. The DAS is a supporting document with illustrative materials. It should always be read in conjunction with the formal scaled drawings and documents which constitute the planning application.

Description of the proposal:

Outline planning application for a residential development of up to 125 dwellings with all matters reserved.



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Please note:
Unless otherwise stated all drawings, maps, images and diagrams contained within this document are not to scale

This outline application is further supported with the following documents and reports from the Design Team

- Planning Statement
- Statement of Community Involvement
- Transport Assessment with site access proposals and tracking plans
- Flood Risk Assessment
- Drainage Strategy
- Landscape Masterplan
- Landscape and Visual Assessment
- Preliminary Ecological Appraisal
- Ecological Impact Assessment including Protected Species Reports
- Archaeological Desk-Based Assessment
- Contamination Desk Based Assessment

The application comprises the following key documents:

- Application Form
- Location Plan
- Parameter Plans and Opportunities and Constraints Plan
- Illustrative Masterplan/site Layout
- Design and Access Document

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1.0

Introduction

1.1

Introduction

Executive Summary

The site is owned by East Stour Developments Ltd, who have had the intention to develop it for many years in conjunction with Redbridge Estates Ltd. They have set about creating a vision for an outstanding residential development to benefit and enhance the local community providing market and affordable/social housing and a much needed boost to Dymchurch’s businesses and services on this eminently sustainable site.

A recent outline planning application, ref: 21/2525/FH, was made by the same Applicant on this same site.

The brief was to design a landscape led proposal that is respectful of the existing environment and ecological features of the site. A landscape framework/masterplan was therefore developed around the existing ecology features including water courses, drainage ditches and ponds, protecting the existing habitats. We were carefully guided by the design teams Ecologists and Landscape design professionals in this task.

Folkestone and Hythe District Council’s planning committee refused planning permission contrary to the recommendation of Officers, citing a single reason for refusal as set out in full below:

1) *“The proposal would be contrary to policies SS1, SS3 and CSD4 of the Core Strategy Review (2022), policies HB1 and NE3 of the Places and Policies Local Plan 2020 and to central government guidance contained in the NPPF and would therefore be contrary to interests of acknowledged planning importance for the following reason:*

a) The location of development proposed lying outside the established settlement edge together with its scale would have a significant adverse urbanising impact on the open countryside, out of character with, and eroding the sense of openness that characterises the area. The development would therefore be unacceptably harmful to the visual amenity of the area.”

This new application takes the previous proposal, that the planning department supported, and modifies and improves it to address the reason for refusal and the concerns of planning committee.

The dwelling numbers have been reduced from 132 down to 125. Although a modest number, the removal of those units has maximum impact allowing us to;

- open up the scheme with large vista perforations,
- increase the already significant public open space in the centre of the site, and
- give it significantly improved tree screening making it less impactful, particularly at the front of the site where viewed from the Dymchurch Road.

The earlier proposal demonstrates 10% Biodiversity Net Gain(BNG). A significant achievement when starting from a position of very good biodiversity and habitats existing on the site already. With the new proposal, through the additional and enhanced landscaping areas, there has been an opportunity to deliver even greater BNG improvements making this site a significant and protected contributor to biodiversity around Dymchurch.

The above improvements will be discussed through this document under each section where they have impact and where appropriate.



The development will provide:

- A rare and significant development opportunity in Dymchurch in an area at low risk of flooding delivering up to 125 new homes of which a policy compliant contribution will be affordable;
- The delivery of a quality residential development with strong sustainability and environmental credentials in a highly sustainable location capable of supporting the vitality and viability of an otherwise heavily tourism-reliant settlement;
- The provision of a high quality landscape led proposal where ecology and existing landscape features, that are at the heart of the proposal, knit seamlessly with the built form;
- The development will not only protect the existing positive ecological aspects of the site but it will increase diversity and density of native species significantly contributing to ecological enhancements and biodiversity gain proven to be at least 10%;
- Local employment at many levels throughout the construction process in addition to the associated injection of commercial activity to Dymchurch brought about by construction personnel;
- A significant contribution to local facilities and services incorporated in the Section 106 Agreement and in the form of CIL payments, and local employment;
- An exceptionally high quality local environment, designed jointly by Kent based architects and landscapers.

Rationale

- Residential development with an outstanding architectural and environmental design creating a high quality local environment
- A site that can deliver real social, economic and environmental benefits to the local area

Vision

- Create a sense of place and community
- Create a new choice of housing

Client and Design Team

The Client and Applicant – Redbridge Estates Limited

A team of consultants have been commissioned by Redbridge Estates Ltd to fully assess the site, its ability to support a residential development and to produce a carefully considered proposal for an outline planning application.

Those consultants are listed below along with their responsibility with regard to the project:

RDA Architects: Architects and lead consultants

HW&Co: Landscape Architects – Providing: Landscape Visual Assessment; landscape design guidance and Landscape Masterplan.

DHA Planning: Planning Consultants – Providing: Planning Statement, policy consultation, Sequential Site Assessment with Exceptions Test.

Native Ecology: Ecologists - Providing: Preliminary Ecological Assessment, Habitat/protected species surveys, Ecological Impact Assessment, Ecological Constraints Plan, and Habitat Mitigation and Management Plan.

Considine: Civil Engineers and Transport Consultants – Providing: Transport Assessment including traffic impact, parking provision, road layout and new access/bridge preliminary design.

Herrington Consulting: Flood and Drainage Consultants – Providing: Flood Risk Assessment including Drainage Strategy, Exception Test and Flood Mitigation.

Knapp Hicks: Consulting Engineers – Providing: Geotechnical Desk Study Including Contamination Potential.

Canterbury Archaeological Trust – Providing: Archaeological Desk-based Assessment.

Architects – RDA Consulting Architects

Lead consultants of design team providing project coordination, master planning, architectural design and design and access statement

RDA Architects have been engaged by Redbridge Estates Ltd to develop and coordinate the design and consultants input.

RDA Architects are a local, friendly Chartered Architects Practice who have been located and designing in the area for 30 years. We have a wealth of experience amongst our talented design team in most fields of architectural design.

The current directors, who all had a long standing position at the practice, set out to instil a fresh approach from taking the lead at the practice some 5 years ago.

Housing of all types, from large volume including master planning to individual, bespoke private dwellings has always formed the largest part of our workload.

The Practice has an established reputation for cost effectiveness, quality, inventiveness and for working within overall budget constraints.

We uphold a philosophy of thoroughness from initial broad concept to fine detail and regard well-designed buildings as being not only the right of the client, performing to his benefit, but also having a contribution to the wider environment.

Establishing close working relationships with stake holders throughout the design, detailing and construction process is a hallmark of our approach as we examine the restrictions on, and explore the potential of each new commission.

We believe that delivering exceptional homes takes a consistent considered design approach from concept right through to the fine technical detail.





DHA Planning – Planning Consultants

Providing Planning Statement and Sequential Site Assessment with Exceptions Test

We pride ourselves on offering sound and honest planning advice in a clear but comprehensive manner.

The process of attaining planning permission can be fraught with difficulties and irreversible consequences. Clients of DHA receive the benefit of our comprehensive knowledge of the techniques and legal framework of UK planning to achieve optimum outcomes. The attitudes and processes of local planning authorities are fully understood due to the firm's extensive experience of planning negotiations, and the past senior local authority experience of many of our consultants. DHA have a commercial and realistic attitude towards planning negotiations on behalf of our clients.

Our aim is to fully understand the complexities of our clients' activities and circumstances, to apply ourselves to the tasks in hand, and maintain transparency of communications throughout. We account for all our activities, reporting regularly and discussing the options in an informal and professional manner.





Hill-Wood & Co Chartered Landscape Architects

Providing: Landscape Visual Assessment; landscape design guidance and Landscape Masterplan.

Hill-Wood & Co Chartered Landscape Architects - based in Kent.

With 15 years of experience in landscape architecture, construction, development, planning and inclusion of ecological and arboricultural practice. We work on a variety of projects ranging from masterplanning of large strategic sites to small scale development, LVIA's and LVA's, Landscape Strategies through to Detailed Planting Plans with Biodiversity Enhancements.

Offering the service of a dedicated team to create positive developments which provide a landscape for now and for the future.

We are a passionate team offering foresight across landscape, ecological and arboricultural elements - ensuring areas of conflict are identified early on. Working in unison across these services creates mutual benefit and gain.

HW&Co's approach to all projects is to ensure the clients brief is met, net biodiversity gain is achieved and the Governments White Bill is fulfilled.

We work with the intent of a collaborative approach to shape the public realm to create lively environments that contribute to people's health, happiness and wellbeing.

The latest Government White Paper 'Planning for the future' is encouraging the development sector towards a greener environment. Our focus is to enhance the environment on site, its wider setting and the sustainability of the future.



Native Ecology

Providing: Preliminary Ecological Assessment, Habitat/protected species surveys, Ecological Impact Assessment, Ecological Constraints Plan, and Habitat Mitigation and Management Plan

A small and efficient team, constantly adapting to developments within their industry. Their team combine a wealth of experience and training to approach each project with an informed and fresh focus.

Ecology in sustainable development – Their aim is to reconnect people and nature by encouraging the integration of ecology into our communities. They work with project teams to achieve Biodiversity Net Gain, aiming to optimise the long-term contribution of a development to the local biodiversity network, enabling wildlife to thrive alongside people

Our Experts in the field





Herrington Consulting

Providing; Flood Risk Assessment including Drainage Strategy, Exception Test and Flood Mitigation

Herrington Consulting were engaged to prepare a Flood Risk Assessment and provide design guidance.

Herrington Consulting has extensive experience in flood risk management and are adept at appraising the risk of flooding to a site, which can occur through a variety of mechanisms including; flooding from rivers, the sea, groundwater, surface water runoff, sewers, reservoirs and other man-made sources.

Clients range from private individuals to major developers aspiring to construct a large number of properties. They work closely with local authorities and other government organisations, providing advice on flood risk and helping to develop strategies, schemes and mitigation measures to reduce the impact of flooding.

The key aim is to help our clients develop sustainable and appropriate developments whilst providing robust advice to enable them to gain a better understanding of the risks associated with flooding.

Herrington Consulting has significant experience in developing and appraising surface water management strategies. The latest version of the NPPF (2019) requires all new development to consider Sustainable Drainage Systems (SuDS), with a view to reducing flood risk. Alongside this, the Non-Statutory Technical SuDS Standards (NTSS) apply for all major development and as such, it must be demonstrated that the development does not exacerbate the risk of flooding elsewhere. A Surface Water Management Strategy (SWMS) is therefore required to be included as part of the planning submission and in some cases can be included within the FRA.

The overarching aim of a drainage strategy is to ensure that the design of the surface water drainage for housing developments avoids, reduces and delays the discharge of rainfall run-off to watercourses and public sewers using SuDS. The objective is to protect receiving waters from pollution and minimise the risk of flooding and other environmental damage.





Considine Civil and Structural Engineers

Providing: Transport Assessment including traffic impact, parking provision, road layout and new access/bridge design

PRE-PLANNING AND FEASIBILITY

The decisions taken at the outset of the project are often the most impactful in terms of the likely success of that project. Spotting the issues and dealing with them before they become costly problems is key. We have a wealth of experience in helping to ensure that the first steps of any new project are in the right direction for the outcome that is required whilst identifying and removing the pitfalls.

CIVIL ENGINEERING

We provide the full range of Civil Engineering services including assisting the masterplanning projects to ensure deliverability, value engineering, outline design for costings and then detailed design for delivery with assistance on site if required. We are experienced in Infrastructure design, flood alleviation schemes, major earthworks, and civil structures.





Knapp Hicks

Providing; Geotechnical Desk Study Including Contamination Potential

Knapp Hicks and Partners Limited (KHPL) were instructed to prepare a Desk Study for the site. The objective was to obtain information on ground conditions including the potential for contamination.

Established in 1966, Knapp Hicks provide Consulting Engineering Services in Structural and Civil Engineering and other specialist areas such as Geotechnics and Materials Consultancy.

Based in London, South East, Midlands and the North of England, the practice is involved in a range of projects throughout the UK and has earned an enviable reputation for providing quality service and professional commitment to many and varied clients. From feasibility studies, structural appraisals, through site investigation, design and construction supervision, to delivering projects on time and in budget, our comprehensive service is tailored to meet the exacting demands of client's requirements.

Knapp Hicks are fully accredited to ISO 9001 and are members of the industry recognised SMAS Worksafe Consultant Scheme. Their technical and professional work force comprises of over 50 staff, and all senior personnel have at least twenty years' experience in their specialist chosen field.



C·A·T Canterbury Archaeological Trust

Providing: Archaeological Desk-based Assessment by Dr J Grigsby

Canterbury Archaeological trust were engaged to provide a desk-based assessment for the site in March 2021 which was updated in February 2024.

CAT are one of the UK's premier archaeological contractors who have been assisting developers, architects, businesses and individuals with their heritage and archaeological requirements for more than 40 years. They have a wealth of knowledge and expertise covering the south-east of England and beyond. CAT is a Registered Organisation with the Chartered Institute for Archaeologists. A ClfA Registered Organisation is part of a unique quality assurance scheme which provides a 'kite mark' of commitment to professional standards and competence.

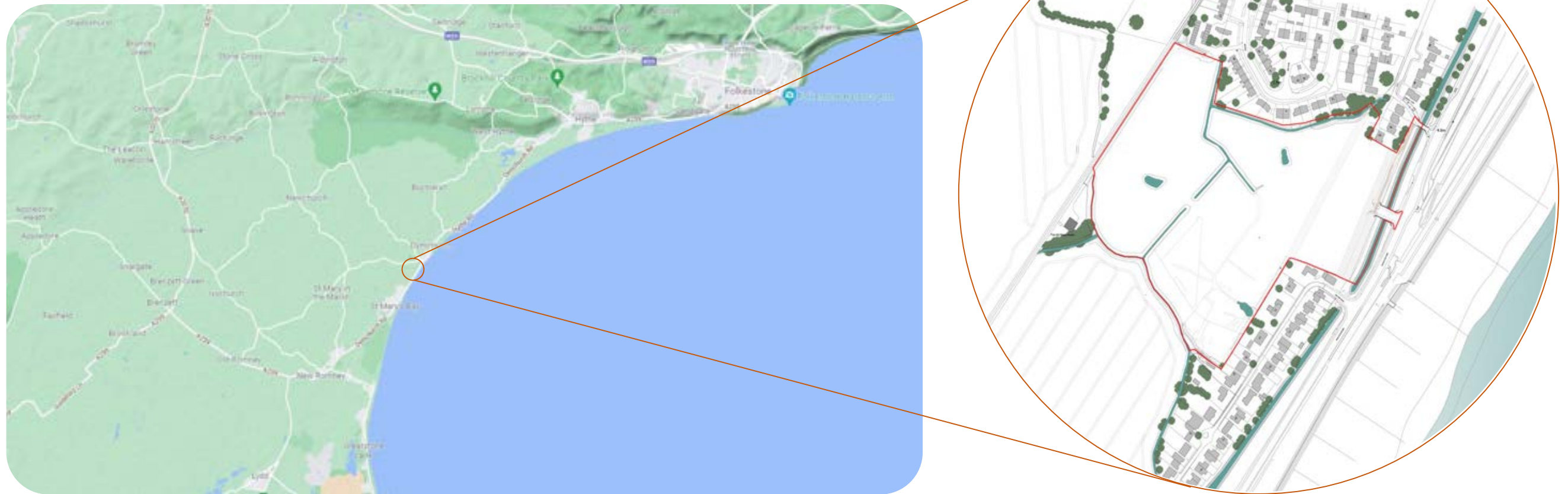
2.0

Site Analysis

2.1

Site Analysis

Site Location



The site is located in Dymchurch on land at High Knocke and covers an area of 16.5 acres.

2.2

Site Analysis

Site Photographs



2.3

Site Analysis

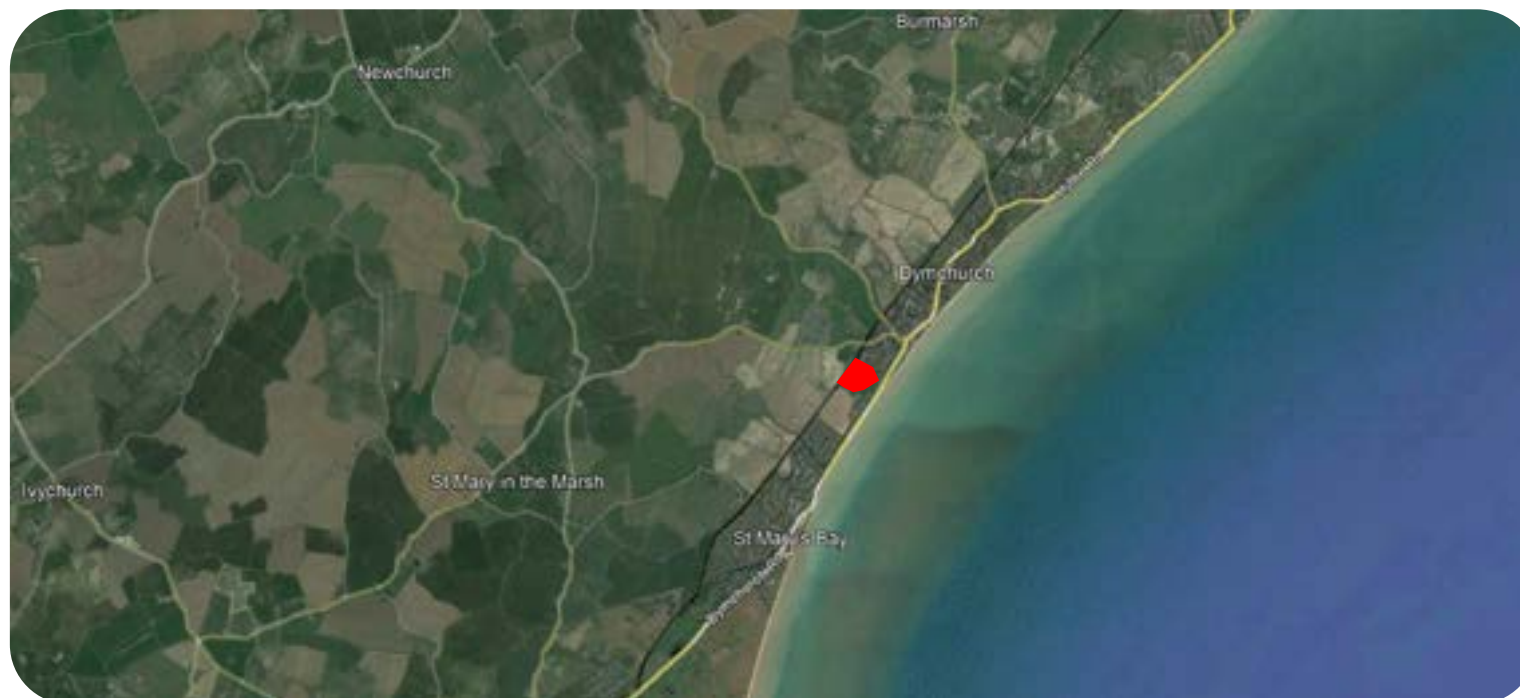
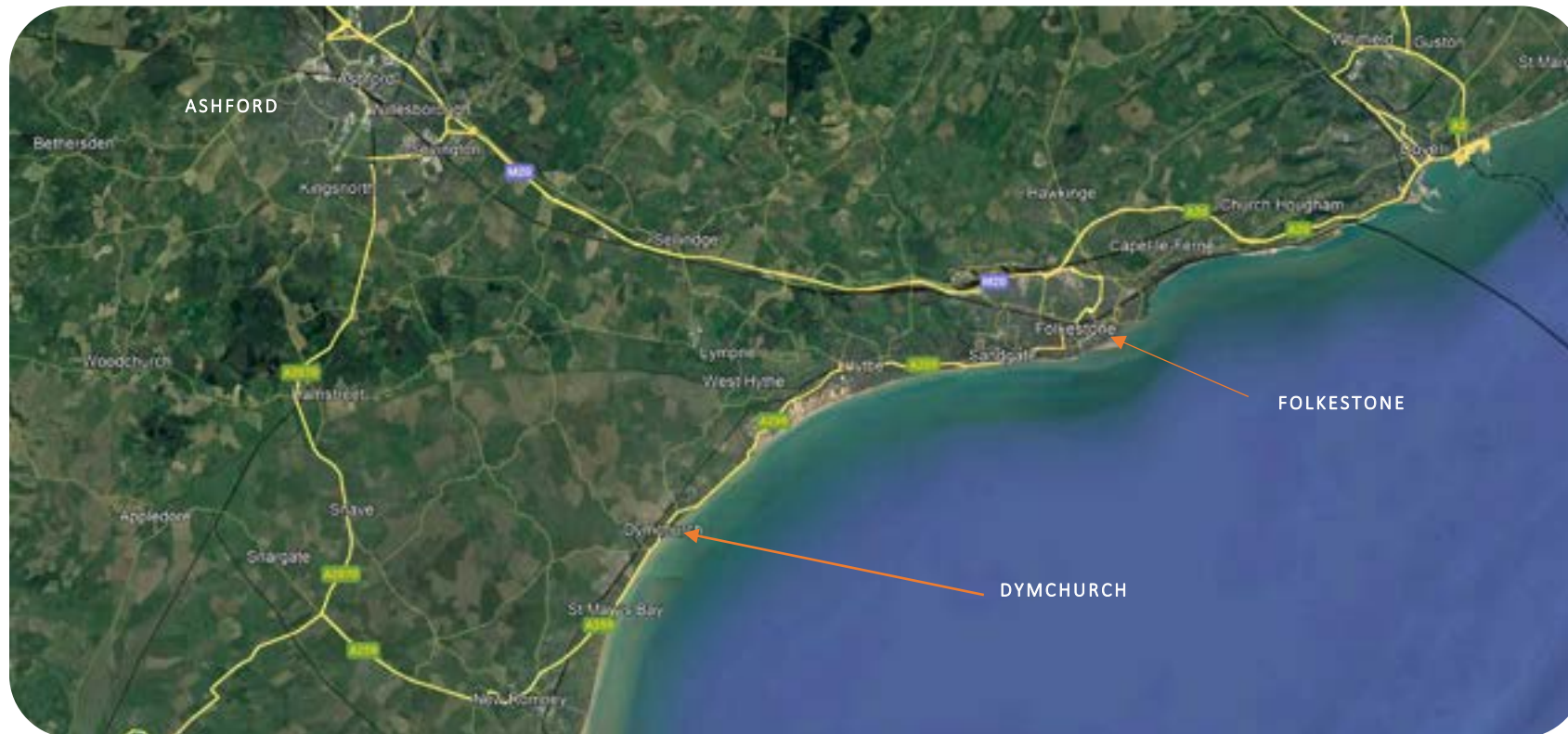
Local Architecture



2.4

Site Analysis

Site Assessment



Site Location and Context

The site is located in Dymchurch at OS coordinates 609689, 128807 off A259, Dymchurch Road.

Dymchurch is a village and civil parish in the Folkestone and Hythe district of Kent, England. The village is located on the coast five miles south-west of Hythe and 3.5 miles north east of New Romney on the Romney Marsh.

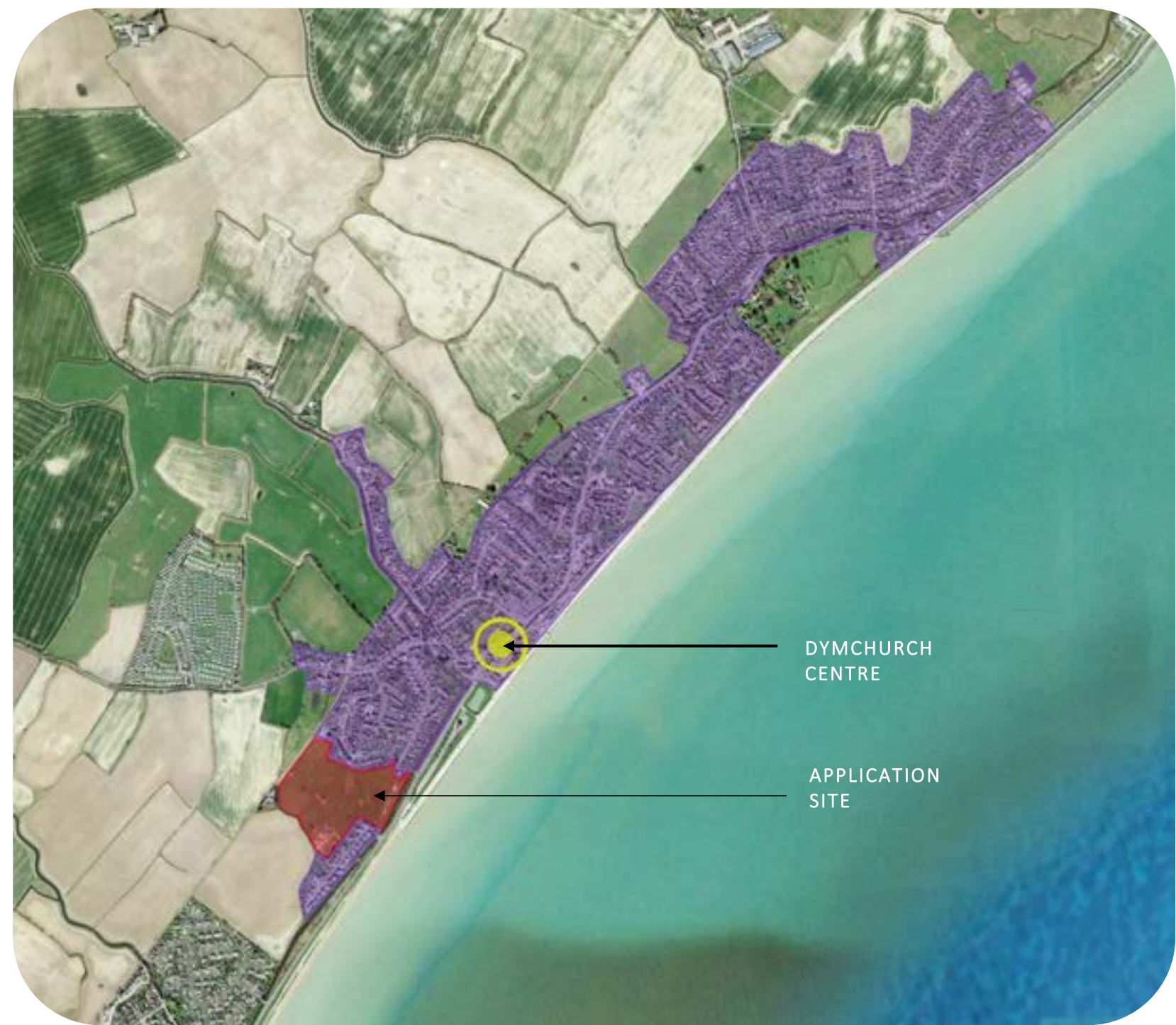
The site covers a relatively flat area of approximately 6.6 hectares and it abuts the south west edge of Dymchurch. It is currently an irregular area of undeveloped grazing fields, with three seasonal ponds and a network of drainage ditches. There is a concentration of modern ancillary farm buildings on the south side (High Knocke Farm) and sheep pens towards the centre. It is bounded to north-west by the Romney, Hythe and Dymchurch light railway line; to the north-east by a field drainage ditch and residences off Marshlands beyond; to the south-east by a larger drainage channel (The Clobdsen Sewer), with the A259 coastal road and the shoreline immediately beyond; to the south by residences at High Knocke housing estate, and to the south-west by another field, drainage ditch with open arable fields beyond that. The area lies at a height of approximately 2–3m AOD.

The proposal will infill the site between the extensive housing of Marshlands and the smaller lineal development of High Knock, both being part of Dymchurch. This seems a logical and natural extension to the settlement but still providing good separation from St Mary's Bay, the adjacent settlement.

The main site access is proposed off the A259 Dymchurch Road which connects to Hythe and Folkestone, to the north and to St Mary's Bay and New Romney to the south. The A259 also connects to the M20, A20, A2070 and the wider strategic road network.

The site is approximately 400m from Dymchurch village centre and therefore within easy walking and cycling distance to local shops and community facilities. This makes the primary school, Railway station, public houses, village hall, health centre and other amenities and facilities readily accessible, demonstrating the sustainability credentials of the site.

The image to the right shows the built confines of Dymchurch settlement and the site in relation to it and its commercial centre. This demonstrates the sites' sustainable location and that it's a logical infill extension to the settlement.



2.5

Site Analysis

Opportunities and Constraints

The diagram below was used to inform the design with regard to all aspects of its site and location that may have influence on it.



2.6

Site Analysis

Ecology

Native Ecology were commissioned via HW&Co. in May 2020 to undertake; Preliminary Ecological Assessment, Habitat/protected species surveys, Ecological Impact Assessment, Ecological Constraints Plan, and Habitat Mitigation and Management Plan. The first site visit was undertaken on 26th May 2020.

Preliminary Ecological Assessment

The objectives of the PEA report were to:

- Describe the baseline ecological conditions present within the site;
- Identify any key ecological constraints both with regards protected species and sites;
- Identify where mitigation will allow significant ecological effects to be avoided or minimised;
- Identify any further ecological surveys required to assess impact on protected and important / notable species;
- To recommend ecological enhancements to be incorporated into the development proposals.

The report assessed habitats within the site for and the likely presence of the following protected species:

Bats, Hazel Dormouse, Otter, Badger, Water vole, other mammals including hedgehogs and brown hare; Birds; Reptiles; Great Crested Newts; Invertebrates; and various Flora.

It assessed potential impacts of the proposal on designated sites including Statutory Sites of International Importance (Dungeness, Romney Marsh and Rye Bay SPA and Ramsar Sites) and Statutory Sites of National Importance.

It provided general advice on ecological constraints associated with proposed development and included recommendations for mitigation and further survey work comprising the following:

- Further survey work for foraging and commuting bats, water vole, wetland birds, great crested newt and aquatic invertebrates.
- An Ecological Impact Assessment (EcIA) detailing the results of the further survey work and any required mitigation that will be implemented prior to and during the construction phase and post development to ensure that potential ecological impacts are avoided, minimised and compensated for.
- An Ecological Constraints Plan be produced to avoid and mitigate for impacts of the proposed development and to inform the ongoing design of proposals.
- A Habitat Mitigation and Management Plan to detail overall mitigation and proposals for habitat management and biodiversity enhancement.

The Ecological Impact Assessment

As a result of the Preliminary Ecological Appraisal, survey work and assessment were carried out for foraging and commuting bats, water vole, great crested newts, winter birds and invertebrates.

The report details the results of protected species surveys undertaken in respect of proposed development and includes an Ecological Impact Assessment based on current proposals.

The objectives of the report were to:

- Describe the baseline ecological conditions present within the Site;
- Identify and describe all potentially significant ecological effects associated with the proposed development;
- Provide appropriate mitigation, allowing significant ecological effects to be avoided or minimised, ensuring no net loss of biodiversity value within the Site;
- Identify appropriate enhancement measures; and
- Set out the requirements for post-construction monitoring (if required).

The Ecological Impact Assessment Report was finalised on 2nd June 2021. It indicated that the provision and delivery of Ecological enhancements specific to the final proposals, together with management and monitoring prescriptions, will be detailed within a Landscape and Ecological Management Plan (LEMP). The provision and delivery of the LEMP report could be secured through an appropriately worded planning condition.

The outline planning application ref: 21/2525/FH was refused on 13th June 2023, not on any ecological grounds. Subsequently an update site visit with walkover survey was undertaken on the 13th December 2023. It established that habitats within the Site were unchanged and therefore the protected species survey work undertaken between 2020 and 2021 is considered to remain relevant. The EIA has been subsequently updated to the new proposal for submission as a supporting document.

Biodiversity Net Gain Baseline Assessment

The PEA and EIA and associated surveys were used to inform Baseline Habitat Condition Assessment for use in the Biodiversity Net Gain Calculations using the statutory (official) biodiversity metric for measuring biodiversity value.



2.7

Site Analysis

Archaeology

Canterbury Archaeological Trust were engaged to provide a desk-based assessment in March 2021 in view of proposed residential development of the site for the first application.

The report was prepared in accordance with national and local policy regarding heritage assets. It constitutes an appraisal focused on the Historic Environment Record, map regression, aerial photograph and existing site records analysis, with provisional historical contextualisation. The research undertaken was in accordance with the National Planning Policy Framework (NPPF)

It suggests that Archaeological remains might be extant within the proposed development area and therefore a program of archaeological evaluation is recommended, in liaison with the Local Authority Archaeologist, so as to establish the presence or absence of buried archaeological remains.

It is therefore likely that this will be conditioned if approval should be given.

To be utilised for this second outline planning application the report had to be updated with a new search of the Historic Environment Records (HERs)

A copy of the full updated report is submitted as a supporting document to the outline planning application.

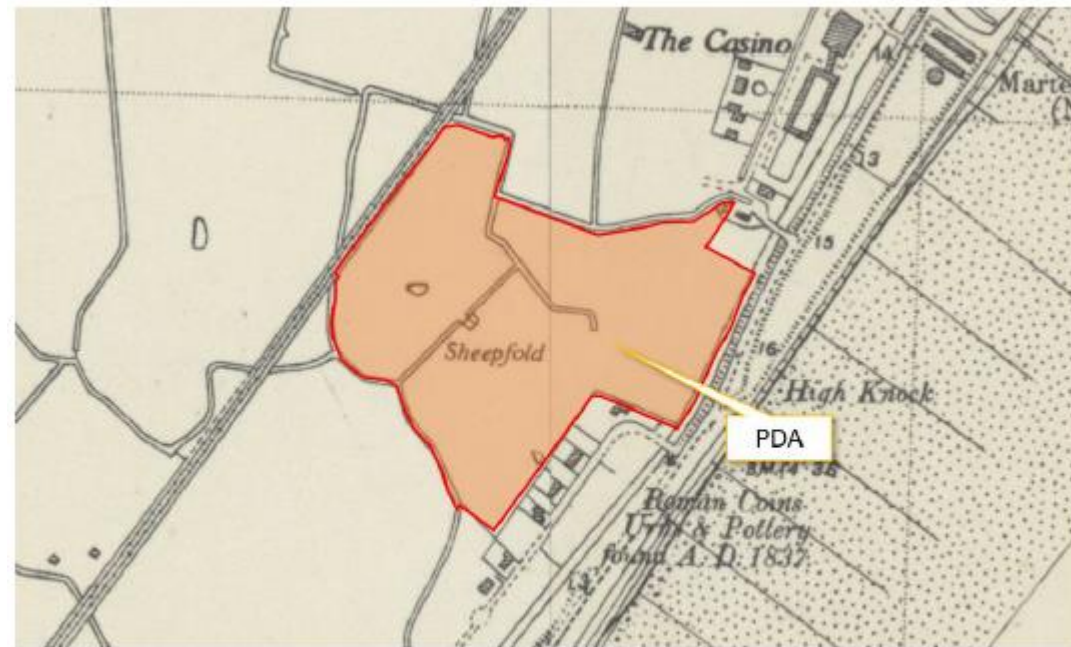


Fig 16. Extract from the OS Map of Kent LXXXI.SE and LXXXII.SW (includes: Dymchurch; Newchurch; St Mary in the Marsh) Revised: 1938, Published: c 1950 showing the location of the PDA.



Fig 15. Extract from the Third edition OS Map of Kent LXXXI.SE and LXXXII.SW (includes: Dymchurch; Newchurch; St Mary in the Marsh) Revised: 1906, Published: 1908 showing the location of the PDA

2.8

Site Analysis

Contamination Assessment

Knapp Hicks and Partners Limited (KHPL) were instructed to prepare a Geotechnical Desk Study. Part of that document was to be a Geo-environmental Desk Study with the objective to obtain information on the potential for contamination. They subsequently carried out a walk over survey of the site to inform their desk top study.

Following the refusal of the earlier application ref: 21/2525/FH, the report has been updated to be appropriate to the new proposal of up to 125 dwellings.

Review of Environmental Information & Historic Maps

A Groundsure Report was obtained by KHPL which they reviewed and commented on. The main purpose of the review is to identify potential sources of contamination, or other potential issues on or off site, that could have an impact on the development.

The Groundsure information was gathered by Emapsite. It provides selected data collected from a number of agencies and departments, including the following: The Environment Agency, local authorities, English Nature, Health Protection Agency and the British Geological Survey using their computerised database facility. A summary of the information is given in their report.

Information gained from the historic maps indicates that the site has not been developed for anything other than agricultural use prior to this proposal.

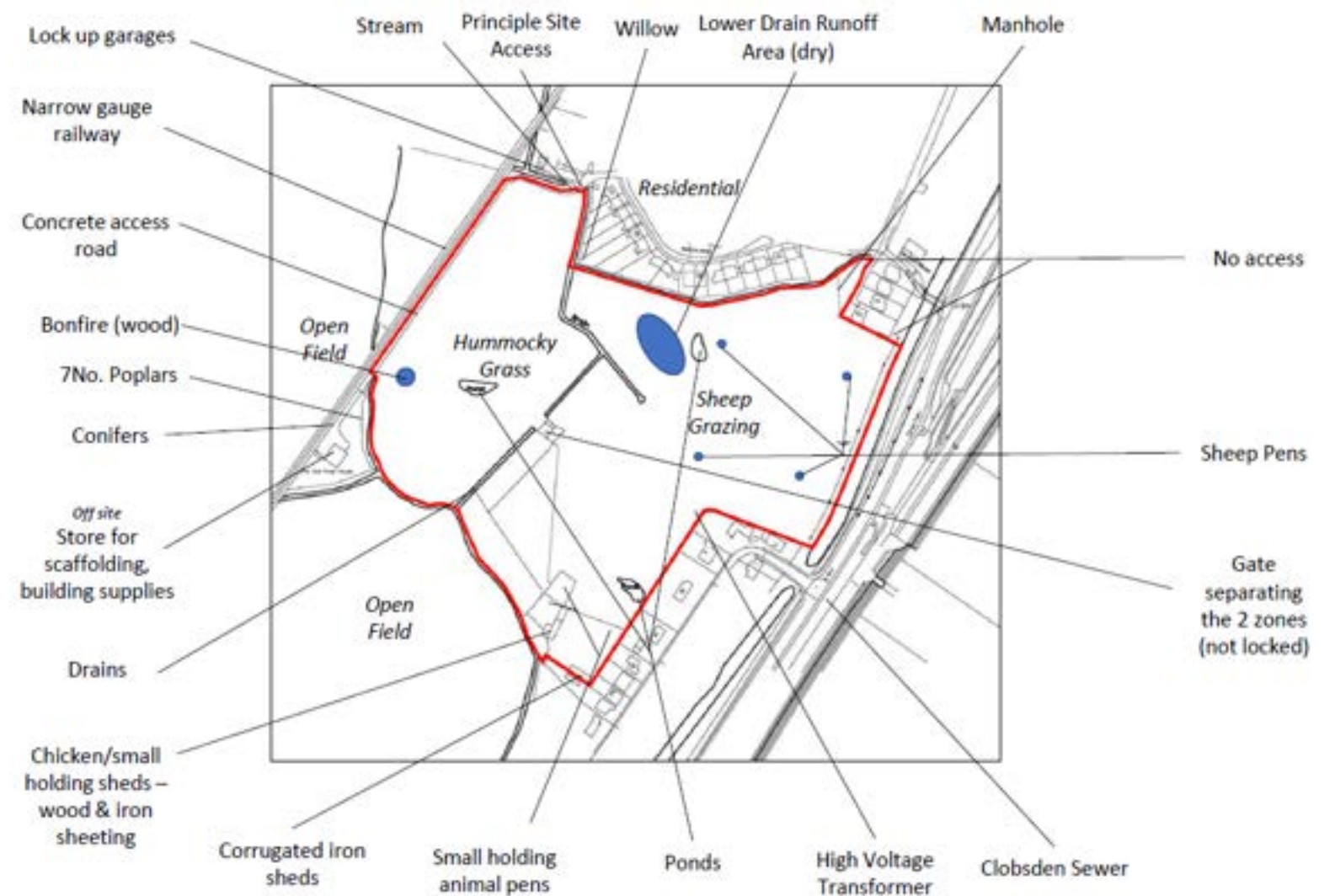
Conclusion

KHPL conclude in their report that, based on the previous usage of the site for agricultural purposes and grazing, it is reasonable to assume that only negligible amounts of Made Ground are likely to be encountered on site.

If Made Ground is encountered or if any contamination is identified it is suggested that a suite of testing is carried out for a range of contaminants including asbestos, heavy metals, PAH and TPH.

Given the residential end use of the site, investigation works are likely to be required to assist with the design of foundations. They recommend that some limited testing of representative sample be carried out to check that the topsoils and subsoils are suitable for retention and/or re-use and that there is no contamination present which might affect potential receptors such as groundworkers and future residents.

A full copy of the updated Knapp Hicks and Partners Limited (KHPL) Geotechnical Desk Study is included as part of the outline planning application as supporting information.



2.9

Site Analysis

Landscape Visual Assessment

Hill-Wood & Co were commissioned by RDA Architects, on behalf of Redbridge Estates Ltd to provide consultant advice on Ecology (including Biodiversity Net Gain), Landscape Visual Assessment and combine the findings of these assessments into a Landscape Masterplan, which covers on site and off site mitigation for the proposed development.

Prior to starting work on the Landscape Visual Assessment, the Folkestone and Hythe Planning Authority were approached by HW&Co. and provided with the methodology of the LVA. The LPA agreed that it was an appropriate form of visual assessment for this outline planning application.

The Landscape Visual Assessment undertook a study in compliance with the Landscape Institute Technical Guidance Note 06/19, Visual Representation of Development Proposals 17th September 2019.

The report assessed 14 viewpoints surrounding the subject site, from a maximum distance of 1.7km from the centre of the subject site, to as close as 150m from the subject site.

The conclusion noted that the site was clearly visible from two viewpoints, 8 and 11. See section 2.10 of the LVA. Both of these viewpoints are at proposed vehicular entrances into the site. Viewpoints 2, 3, 5, 6, 7, 10, 12, 13 and 14 have glimpse or part views into the site.

The Landscape Visual Assessment was used to develop the combined landscape and architectural masterplan strategy.

The earlier outline application ref: 21/2525/FH was refused for single reason related to the LVA as it suggests that the proposal would have had an unacceptable visual impact on the area. This is against the LVA's findings that were accepted by the Local Planning Authority.

An updated LVA has been submitted with this new outline planning application as a supporting document.



3.0

Planning Policy

3.1

Planning Policy

Planning Policy Summary

The Planning Statement has been prepared by DHA Planning on behalf of Redbridge Estates Ltd in support of this amended outline planning application. The summary and conclusions are as follows.

The site is located outside of the defined settlement boundary of Dymchurch and therefore for the purposes of planning is considered ‘countryside’ where policies of restraint generally apply. Nonetheless, the application site represents a logical, highly accessible southern extension to Dymchurch that is exceptionally well related to the settlement centre and a range of day-to-day facilities and services.

We acknowledge the Flood Zone 3 designation of the site (albeit benefiting from recently upgraded flood defences). This being the case, it is demonstrated through the submission of the supporting Flood Risk Assessment and Sequential Test Assessment with the inclusion of detailed SFRA mapping, that the application site is suitable for development and one of the least vulnerable sites where new development could reasonably be located.

Detailed modelling beyond the scope of the Environment Agency strategic level ‘flood map for planning’ confirms that the overall risk of flooding is ‘low’ and the proposed development can nonetheless be made safe throughout its lifetime through the use of comprehensive mitigation measures.

The previous application was refused planning permission by Members of FHDC’s planning committee, contrary to the recommendation of Officers citing a single reason for refusal in relation to the scale and location of the proposal and the impact of the development on the character and openness of the countryside.

Accordingly, this amended scheme now seeks consent for an alternative scheme of reduced scale and reconfigured layout and landscaping which seeks to respond positively to the previous reason for refusal.

Whilst the Council are understood to be able to demonstrate a five-year housing land supply, the Council’s housing delivery record however remains less than favourable and has improved just 2% following the publication of the Action Plan.

Whilst the Council’s housing land supply position remains marginal and delivery continues to fall short, if the Council are to avoid the presumption in favour being engaged by virtue of poor delivery, and when the Plan becomes five years old by virtue of inadequate supply, it is necessary to ensure a robust supply of new homes on a range of suitable sites are granted across the borough.

For the avoidance of doubt, the clear public benefits include the following:

- The delivering of up to 125 new homes, including a policy compliant quantum of affordable housing.
- The provision of up to 125 dwellings on an unconstrained site will make a valuable contribution to the Council’s marginal five-year housing land supply position and assist in improving the present under-delivery. There is clear evidence that a robust supply of windfall development sites such as that of the Applicant’s is necessary in order for the Council’s housing position to be maintained and/or recovered.
- The revised proposals will deliver new residential development in a highly sustainable location adjacent to the rural centre of Dymchurch, capable of both sustaining and enhancing the provision of services and facilities and supporting the vitality of the rural community.
- The application site is located adjacent to high-quality pedestrian and cycle infrastructure and in close proximity to bus stops frequently served by routes between New Romney and Folkestone. The proposals therefore increase opportunities for people to travel via sustainable and active modes.
- The application site comprises a relatively rare opportunity in Dymchurch capable of development in an area at low risk of flooding.
- The amended proposals provide greater opportunities for a strongly landscape-led scheme appropriate within the Romney Marsh coast local landscape character subarea and will retain key views, introduce and reinforce internal and boundary landscaping and increase opportunities for significant ecological enhancement.
- There are otherwise no environmental, heritage or highways reasons to resist development and the proposals can be delivered without detrimental impact upon neighbouring residential amenity.
- The amended proposals will continue to make a significant contribution to local facilities and services in the form of CIL and S106 payments, local employment, Council Tax and the New Homes bonus.

In summary, we acknowledge that there are sensitive matters to be balanced. However, the revised proposals are well-informed and we firmly consider that the numerous identified public benefits of the latest proposals outweigh any limited perceived degree of harm.

Consequently, we consider that the circumstances justify this sensitive and well-planned development.

4.1

Design Development

Design Brief

RDA Architects were approached by Redbridge Estates Ltd to investigate the potential of residential development on the site at High Knocke Farm being an obvious extension to the settlement of Dymchurch, filling in between two existing established residential areas in a sustainable location.

The brief was essentially to design a development with high ideals that:

- is respectful of the local community and surrounding housing;
- is respectful of the existing environment and ecological features of the site being landscape led;
- provides a variety of good quality housing that people would like to live in; is of a suitable density to fulfil obligations of making the best use of the site but at the same time avoid over development and a too dense a layout to give residents space to breathe



4.2

Design Development

Masterplan Evolution

Previous Planning Application

This first section deals with the layout evolution of the proposal put forward in the first outline planning application 21/2525/FH, for up to 132 dwellings, that was refused on 13th June 2023 despite being recommended for approval by Folkestone and Hythe Planning Authority.

That proposal demonstrated, following a rigorous site analysis, investigation and design process, that a scheme for up to 132 dwellings was deliverable against all site parameters and within policy context as confirmed by the recommendation for approval by development control.

The following development evolution process for that application is relevant to this new proposal as it has been further refined to deal with the single reason put forward for refusal that is discussed later in this document.

The site is currently rented out as grazing land for small scale farm use for some sheep which has been its use for significant time.

An initial sketch layout was prepared for the first pre application advice meeting that indicated general development areas, access opportunities, diagrammatic road layout and existing landscape/ecological features.

A pre application advice meeting was arranged and held on Wednesday 13th November 2019 at 2:20pm at Folkestone & Hythe District Council Offices.

The attendees of that meeting were: Claire Dethier and David Whittington of Folkestone & Hythe Council; William Moss of Redbridge Estates Ltd (Applicant); Meriel Mortimer (PSO) and Jennifer Wilson (Sustainable Places) of the Environment Agency; Tony Jenson of KCC Highways Agency; Kirsty Thomas and Toby Vaughan of Herrington Consulting; Craig Dobson and James Reuther of RDA Architects.

The principle of developing the site for residential use was concluded as worth pursuing and initial parameters were agreed to frame up the design such as; new site access including new bridge, quantum of development, flooding and drainage issues, and the requirements of a planning application to be put forward.



An assessment was made of validation requirements and a team engaged to look at the provision of the required reports and information including: Landscape Visual Assessment; Landscape Masterplan; Preliminary Ecology Appraisal, Ecological Impact Assessment Report including Protected Species Reports; Flood Risk Assessment; Drainage Strategy; Archaeological desk-based Assessment; Contamination Desk Based Assessment. The results of the above all fed into the layout as it was developed.

The design team were put together to provide consultation, the required reports and to develop the design.

At the outset, it was fully appreciated by the design team that the proposal needed a very carefully considered and sensitive approach, particularly with regard to environmental and ecological aspects.

A Preliminary Ecological Assessment was made on the habitats and protected species that exist on the site. It recommended what surveys were needed and they were subsequently carried out. A follow up Ecological Impact Assessment and report was subsequently prepared from the survey results.

A joint approach between architecture, landscape and ecology was considered essential and a strategy for development was devised which was landscape led being based on the Landscape Visual Assessment.

All water features were decided to be maintained including drainage ditches and ponds. They would be enhanced for the benefit of residents but more importantly to provide ecological gain with improved biodiversity.

To start the design process HW&Co, the Landscape Architects, prepared various cross sections across the boundaries of this site showing their suggested landscape treatment to start the exchange of design ideas. They prepared an initial landscape strategy plan showing the possible development parcels enabling strong visual and physical linking as well as enhancement of the existing landscape character on the site.

That initial strategy was informed by early flood risk assessment information that suggested areas of the site that were least desirable for dwellings from a sequential approach along with height above datum of safe floor levels.

RDA Architects carefully looked at the opportunities and constraints of the site including landscape, ecology and flood risk and worked up an initial layout/architectural proposal to establish an internal transport network including a road hierarchy, footpath and cycle networks and a perimeter recreational path to the site.

This initial sketch layout established the number and layout of the dwellings, their access and parking, and it firmed up landscaping areas that had previously been loosely defined and agreed.



The layout was shared with the Romney Marshes Area Internal Drainage Board and a site meeting was held with them along with Herrington Consulting to ensure design and drainage assumptions were correct and acceptable with regard to the water bodies that they have influence on.

The layout was circulated to the design team with all reports and surveys including highways refinements and tracking feeding into the design. The architectural layout and landscaping were further developed hand in hand with RDA Architects working closely with HW&Co.

The resulting indicative layout demonstrated that 132 dwellings can be comfortably accommodated on the site with relatively loose density whilst allowing for ecological mitigation and improved biodiversity, landscaping, public open space, children's play spaces, pedestrian and cycle networks independent of the roads, views out of the site to the countryside, and the required parking.

Tony Jenson of KCC Highways was present at the pre application advice meeting which set up the parameters for the scheme's design. He has been giving ongoing pre application advice to Considine and RDA Architects as the scheme has been developed with several rounds of comments on progressive layout versions.

The developing layout, transport assessment, junction layout/access bridge and tracking of the road network have all been regularly shared with him and adjusted accordingly with the current layout being approved by him with no outstanding issues.

The proposal was presented to the Dymchurch Parish Council on 19th May 2021 for their comment on behalf of the community they represent. Overall, the Parish Council (PC) were pleased with the scheme so far and felt that it would enhance Dymchurch bringing the much-needed housing they feel it needs, particularly the affordable element. They also noted that the new housing would help support the local economy and businesses.

After the meeting it was suggested that the councillors were all very positive about the proposal and that they all appeared to support it. It seemed to be agreed by all that that was the case. Some ideas were brought forward by them that have now been incorporated within the proposal.

It was discussed and agreed with the Parish Council that the community should be consulted directly and that they would help promote the consultation by including information on a suitable event. They assisted with advice and help with where to advertise around Dymchurch to ensure local people were informed about it.



On Wednesday 14th July 2021 a public consultation event was held at The Peter Sloper Room, Dymchurch Village Hall, 6 Orgarswick Avenue, Dymchurch, TN29 0PU and it was well attended with over 100 people taking part over the day. There were 4 representatives from the design team that were available for discussion all day.

The material presented included an indicative layout/masterplan, an indicative landscaping masterplan, an opportunities and constraints plan and several diagrammatic plans/parameter drawings explaining the design and how it was developed around the existing landscape, with ecology in mind. A number of members of the public that attended the event asked for, and took away, copies of items of the presentation material.

The layout was further amended to take account of both Parish Council and public consultation comments which are extensively covered later within this document.

The layout was then submitted to the Designing Out Crime Team at Kent Police. They made comments which are mainly applicable to the future reserved matters application. However, the few comments that impact on the outline planning application layout have been accommodated. The layout was signed off by the DOCO with no outstanding issues to be resolved.

The indicative masterplan layout, that had evolved over the above development process, clearly demonstrated that a proposal for 132 dwellings could be successfully, sympathetically and safely (highways, flood risk and secured by design) accommodated on the site whilst allowing for; current parking and space standards, a high level of ecological enhancement, a 10% gain in biodiversity, and generous public open space.

The layout was submitted to Folkestone and Hythe District Council for comment as extended pre application advice prior to making the first outline planning application ref: 21/2525/FH.

Following submission and full scrutiny by all consultees, the planning report, prepared by the case officer, recommended the proposal for approval by the planning committee. Subsequently the application was refused for a single reason, as highlighted in the executive summary, that was not identified as an issue in the planning process.



This Current Planning Application

Following the refusal of the earlier application, ref: 21/2525/FH, the Applicant and design team have examined the reason, and in this new application propose alterations and improvements to the first scheme to make it more acceptable in relation to its impact on the open countryside and the sense of openness that characterises the area.

In the new proposal we are not only improving on the already exceedingly good base of sustainability and ecology credentials but are proposing a reduction in dwelling numbers from 132 down to 125. Although a modest number, the removal of those units has maximum impact allowing us to; open up the scheme, give it better screening making it particularly less impactful at the front of the site, and increase the already significant public open space at its centre.

To make the new proposal more acceptable in relation to its impact on the open countryside and the sense of openness that characterises the area, the improvements in more detail are as follows:

- The front of site dwellings have been moved 10m further back from Dymchurch Road and their parking and drives relocated to make way for a significant planting and screening belt in addition to the already provided landscaping margin to Clobdsen Sewer. This reduces the developments impact when seen from the sea wall and Dymchurch Road which is the key view by which most people would perceive the development. The Number of dwellings has been reduced along the road, also helping to reduce impact.
- The central vista has been increased to 30m wide. It runs through the site from the access bridge. This allows views from the sea wall and Dymchurch Road, through the site, to the countryside beyond. It also provides views from within the sites central open public space out of the site in both directions.
- The central public open space, bordering and providing buffering to Marshlands, has been expanded by removing a group of 5 dwellings. A central public gathering area is proposed and an amphitheatre type space is shown. This could also be the position of a public art installation. The extra area increases the feeling of openness and at the same time provides the opportunity for the inclusion of an extended activity space for children and the more natural surface water drainage solution of swales and rain gardens. These can be planted up with a meadow mix to provide additional varied and biodiverse habitats.
- The North East to South West vista, containing an existing watercourse/drainage ditch and emanating from the central public open space, has also been widened to provide extended views of the countryside from within the site. It will also provide increased habitats and further opportunity to increase BNG. This vista gap, by making an increased and significant separation between the two groups of dwellings, further reduces the impact of this edge of the development on the countryside.
- The open space and pathways to the southwest perimeter have been reconfigured to provide more generous planting belt for screening, along with rain gardens to assist in the natural dispersion of the surface water. The rain gardens would be landscaped with native plants to form new biodiverse habitats.

- It is proposed that the perimeter and internal pathway network that weaves throughout the landscape and ecological features, could become a nature trail with information boards around the site that also explain its ecological features, how they are protected and enhanced, and what residents can do to help ecology and biodiversity in the shared spaces and at home promoting community engagement.



4.3

Design Development

Highways Design

A pre application advice meeting was arranged early in the projects development on Wednesday 13th November 2019 at 2:20pm at Folkestone & Hythe District Council Offices between a team from Folkestone and Hythe District Council including Planning and Housing, a representative from KCC Highways, a team from the Environment Agency, flood and drainage specialists Herrington Consulting, Redbridge Estates Ltd and RDA Architects.

Tony Jensen of KCC Highways was present at that meeting which set up the parameters for the scheme's design.

The principle of developing the site for residential use was concluded as worth pursuing and initial parameters were agreed to set the design such as new site access including new bridge, quantum of development, flooding and drainage issues and the requirements of a planning application to be put forward.

The key points of the resulting KCC Highways written pre application advice was as follows:

- The site looks to have an existing access with access rights onto Marshlands but it would be limited to small development with a private driveway.
- Various access scenarios were discussed including via Marshlands, High Knocke Estate, Seabourne Way and via the Dymchurch Road (A259) directly.
- Although potentially costly, in terms of access, a new bridge over the Clobdsen Sewer drain may be a simpler approach, with a secondary emergency access/pedestrian access elsewhere.
- A development of over 80+ units would require a Transport assessment to support the proposal. This would need to assess the operation of the intended access point and considering the proximity to Dymchurch, this would also need to assess the nearby A259 mini roundabout.

Considine Civil and Structural Engineers and Transport Consultants were commissioned by Redbridge Estates Ltd, shortly after the Pre-Application Advice meeting to assess Transport and Travel options for the proposed development and provide a Transport Assessment including traffic impact, parking provision, road layout and new access/bridge preliminary design.

Development Proposals

The indicative layout has a main circulatory loop road from the new bridge/junction access off the Dymchurch Road (A259) to the east of the site as the main distribution. It is designed to give priority to pedestrians and cyclists with shared spaces, and to limit the speed of traffic within the development to a maximum of 20mph. Off that loop, and to the east, is located the emergency access utilising an existing driveway which connects with Marshlands.

The access network is designed with a hierarchy of varying street types. These vary with character area, level of importance, and area of site served breaking down to a number of small private drives.

Access of fire tenders and refuse freighters throughout the site has been carefully considered with a refuse strategy in mind.

The first layout was prepared following the pre application advice meeting taking note of the above and provided to Considine for comment/advice and to be tracked. The preliminary Transport Assessment was based on this layout. Together with the developing site layout, it was submitted to Tony Jensen, KCC Highways, for further Pre-Application Advice/comment.

Extensive detailed comments were returned and the layout adjusted accordingly. This pre application process carried on through two further layout iterations and amendment responses ending with the submitted proposed layout.

Prior to the application ref: 21/2525/FH being submitted and subsequently refused, KCC Highways were completely happy with all aspects of the indicative layout including: all of the vehicle, cycle and pedestrian access arrangements; the tracking of refuse freighters, fire tenders and other large vehicles; new primary bridge access to the site; emergency access; parking provision in line with current standards including visitors; connectivity to the surroundings; proposed adoptable parts of the new access network; proposed signalised pedestrian crossing; and visibility splays.

It was confirmed that KCC Highways continued to have no issues with the proposal when the planning officer put forward to the planning committee with a recommendation for approval. Furthermore, the refusal did not include any highways grounds.

The internal transport network, including roads and footpath and cycle networks, remains the same with the exception of the removal of a small spur road and bridge that served 5 dwellings adjacent to Marshlands. The proposal has been reduced to up to 125 dwellings resulting in less vehicular movements.

As it has been clearly demonstrated by the previous application that that a proposal for 132 dwellings is deliverable within all policy constraints, including transport and therefore it is not necessary to go through the same exercise to prove it for a lesser number.

For the above reasons the transport assessment for the original application remains current. This has been checked with both the Transport Consultants and KCC Highways prior to submission of this new outline planning application.

Transport Assessment

Considine's Transport Assessment report assesses Transport and Travel options for the site to support this outline planning application with the following conclusions:



The proposed development layout shows a development of up to 125 homes including affordable/social units alongside car parking, cycle parking, sustainable drainage, internal road network and the creation of a principal access off A259 Dymchurch Road and a signalised pedestrian crossing of the A259.

The main site access is proposed off A259 Dymchurch Road. The access will bridge the watercourse running parallel with Dymchurch Road in accordance with KCC Highways and the Environment Agency who control the watercourse. The nearest bus stops are on the A259 Dymchurch Road, close to the site and frequent services are provided to towns and villages including Dover, Folkestone and Dungeness.

The personal injury accident records for the highways surrounding the site for a recent 5 year period have been examined. There were no accidents on the highways immediately adjacent to the site and an isolated accident along the A259 away from existing side road junctions. There is no reason to suppose that the proposed development will compromise the level of safety on the highway.

Comparable sites from TRICS version 7.8.1 online database were used to derive the vehicular trip rates for the proposed development. The trip rates have been derived in accordance with the 'TRICS Good Practice Guide'.

Distribution of development generated vehicle trips is based on 2011 Census Journey to Work data obtained from 'Nois'; a government web-based database of labour market statistics. The vast majority of outbound trips (AM) are to Folkestone and Hythe and Ashford to the north of the site and would turn left out of the site access junction. Only vehicle trips to Rother and Hastings (combined 2.7%) would turn right out of the site. These movements are reversed for PM inbound vehicle trips.

The proposed site is predicted to generate just over 60 No 2-way vehicle movements in both weekday AM and PM peak hours which equates on average to about one additional vehicle movement every minute during the peak hours.

Junction capacity assessments carried out for the 2031 'with development' scenario indicate that the junctions in the study area can accommodate the predicted number of vehicular trips generated by the development without the need for off-site highway junction improvements.

NPPF states that 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'

The definition of "severe" in this context is unique to the individual site under consideration. However, it may be helpful to consider that within the context of the Environmental Impact Assessment "severe" impacts are often described as those that would have a national or regional significance. In this respect, NPPF is seeking to strike a positive balance between potential local traffic impacts, maintaining local characteristics and local economic/social benefits.

On balance, the impact on highway safety, or the residual cumulative impacts cannot justifiably be considered severe, so the development proposals are acceptable.

A full copy of the transport Assessment is submitted in support of this outline planning application.

4.4

Design Development

Landscape & Visual Assessment

Hill-Wood & Co were commissioned by RDA Architects, on behalf of Redbridge Estates Ltd to provide consultant advice on Ecology (including improving biodiversity) and a Landscape Visual Assessment and to combine the findings of these assessments into a Landscape Masterplan, which covers on site and off site mitigation for the proposed development.

Various surveys and walkovers were carried out in 2020, which have led to a number of protected species surveys being completed in 2021. The surveys and walkovers are now complete and have been carried out in a timely manner directed throughout by Hill-Wood & Co. The findings of these surveys are incorporated into the landscape masterplan through the retention of the existing landscape character of the various ponds and ditches within the subject site. The retention of these areas alongside additional biodiversity enhancement on the site provides ample mitigation for a number of fauna and flora. This is to be combined with off-site habitat enhancement for Great Crested Newt, where our client has secured off site mitigation through Natural England and their District Level License Scheme.

The Landscape Visual Assessment undertook a study in compliance with the Landscape Institute Technical Guidance Note 06/19, Visual Representation of Development Proposals 17th September 2019. This report assessed 14 viewpoints surrounding the subject site, from a maximum distance of 1.7km from the centre of the subject site, to as close as 150m from the subject site. The conclusion noted that the site was clearly visible from two viewpoints, 8 and 11. See section 2.10 of the LVA. Both of these viewpoints are at proposed vehicular entrances into the site. Viewpoints 2, 3, 5, 6, 7, 10, 12, 13 and 14 have glimpse or part views into the site.

HW&Co worked closely with RDA Architects on the findings of the LVA and ecology surveys to develop a landscape led site plan which retained important landscape and ecology features, enhances boundary vegetation, conserves views out from the site into the open countryside whilst providing significant screening of the development from the open landscape into the site. This is achieved through a key design principle where a pedestrian circulation route has been provided around the perimeter of the site. The route encourages residents and others to walk around the site next to the existing ditch network providing a circulatory route connecting the various ponds with large expansive lengths of footpath with clear views out into the surrounding open countryside. The footpath is then bordered by wide belts of native tree and shrub planting which obscures the proposed built form on the site from the wider countryside.

There are various internal open spaces within the scheme which unite biodiversity with public use. These spaces are the green lungs to the development and continue the main principle of reconnecting the new residents with the historical landscape of the site pre-development. Redbridge Estates Ltd.'s proposals are respectful, carefully considered and well thought out.

Following the refusal of the earlier application, ref: 21/2525/FH, the Applicant and design team have examined the reason, and in this new application HW & Co., working alongside RDA propose alterations and improvements to the first scheme to make it more acceptable in relation to its impact on the open countryside and the sense of openness that characterises the area. The alterations and improvements are discussed at the end of the earlier Design Development Section 4.2 under 'This Current Application'.

All of the Landscaping supporting documents have been updated to the new proposal by HW & Co. including the Landscape Masterplan and Landscape Visual Assessment and are submitted in support and part of this outline planning application.

Findings from Landscape Visual Assessment:

County Landscape Character:

The recommendations to '*conserve and restore*' within The Romney Coast, County Landscape Character has been used as the main design focus of the proposals.

The open views along the north western and eastern boundaries allow clear open views and protect the sense of place in the Landscape Assessment for this area. These open views have been retained from the access road into the site from the south, all the way through the circulation road around the site to the west and north.

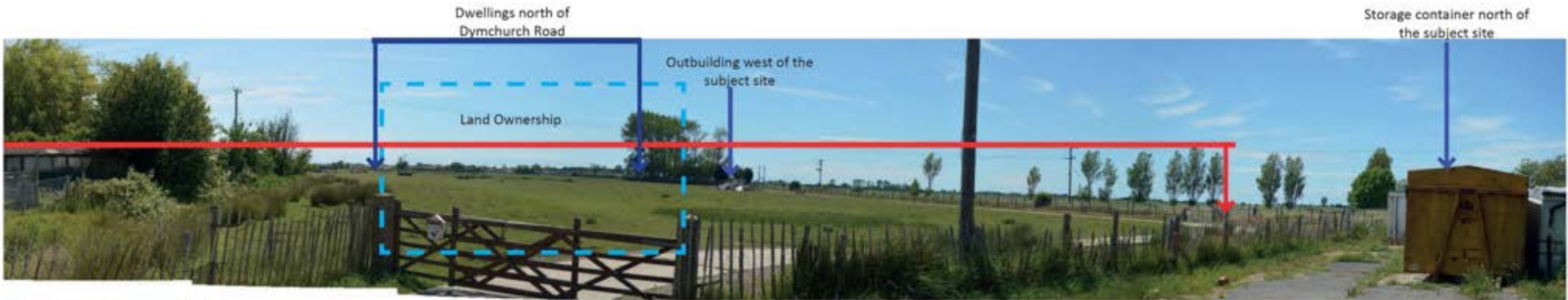
The layout has been designed with the open views to the surrounding landscape to the north and west of the site being retained through the incorporation of a circular walkway around the perimeter of the site. This walkway has been designed with a strong vegetation boundary on the internal aspect of the site. This landscape buffer is key to retaining views from the perimeter footway out into the open countryside whilst obscuring the built form within the internal make up of the subject site.

The water network and ditches have been retained and enhanced with a pedestrian route around the site, enhancing the sites biodiversity and enjoyment of the views out of the site by all users of it. The south eastern entire frontage vegetation is to be retained and enhanced through management of the Clobdsen Sewer.

Borough Landscape Character:

The Borough Landscape Character Area of Romney Marsh Coast describes the site as '*intermittent pockets of farmland. With the character area of moderate scenic quality, with some attractive views out to the west and east*'. The features in this description are the elements of the proposals which have been deliberately retained and enhanced for the next 100 years of landscape character and biodiversity enhancement.

Key views from the LVA are included below. For the full Assessment including all of the other views please see HW & Co's LVA as submitted as a supporting document.



Panoramic image for context only

SENSITIVITY OF RECEPTOR

SUSCEPTIBILITY TO CHANGE	HIGH	MODERATE	MODERATE to HIGH	HIGH
	MODERATE	LOW to MODERATE	MODERATE	MODERATE to HIGH
	LOW	LOW	LOW to MODERATE	MODERATE
	LOW	LOW	MODERATE	HIGH

Sensitivity matrix combining value of view with its susceptibility to change

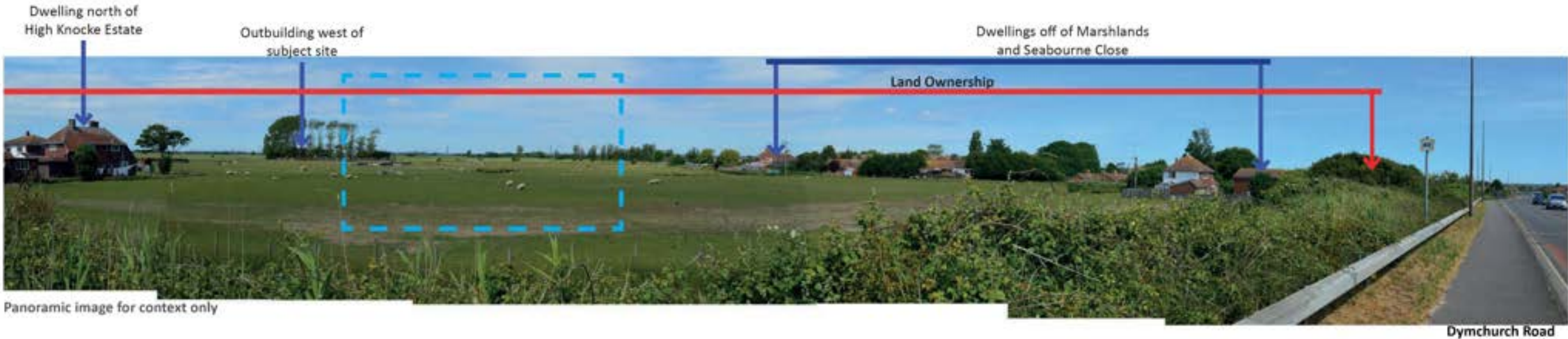
The overall Degree or Level of Effect for the development proposals as a whole can be seen in section 5

Indicates 50mm frame & 39.6° HFoV. This can be seen at 100% enlargement in section 6 of this report

Viewpoint information:

Visualisation Type:	1
Projection:	Planar
Enlargement Factor:	See section 6
Horizontal Field of View:	See section 6
Direction of View:	356 Degrees from North
Distance to centre of site:	150m
Date:	13/06/2020
Time:	13:29
Camera height:	1.65m
Camera:	Nikon DX D3200
Lens:	AF-S 18-55mm

Locations of viewpoint ref: LVA Desk Study 2.10



SENSITIVITY OF RECEPTOR

SUSCEPTIBILITY TO CHANGE	HIGH	MODERATE	MODERATE to HIGH	HIGH
	MODERATE	LOW to MODERATE	MODERATE	MODERATE to HIGH
	LOW	LOW	LOW to MODERATE	MODERATE
		LOW	MODERATE	HIGH

Sensitivity matrix combining value of view with its susceptibility to change

The overall Degree or Level of Effect for the development proposals as a whole can be seen in section 5

Indicates 50mm frame & 39.6° HFoV. This can be seen at 100% enlargement in section 6 of this report

Viewpoint information:

Visualisation Type: 1

Projection: Planar

Enlargement Factor: See section 6

Horizontal Field of View: See section 6

Direction of View: 110 Degrees from North

Distance to centre of site: 175m

Date: 13/06/2020

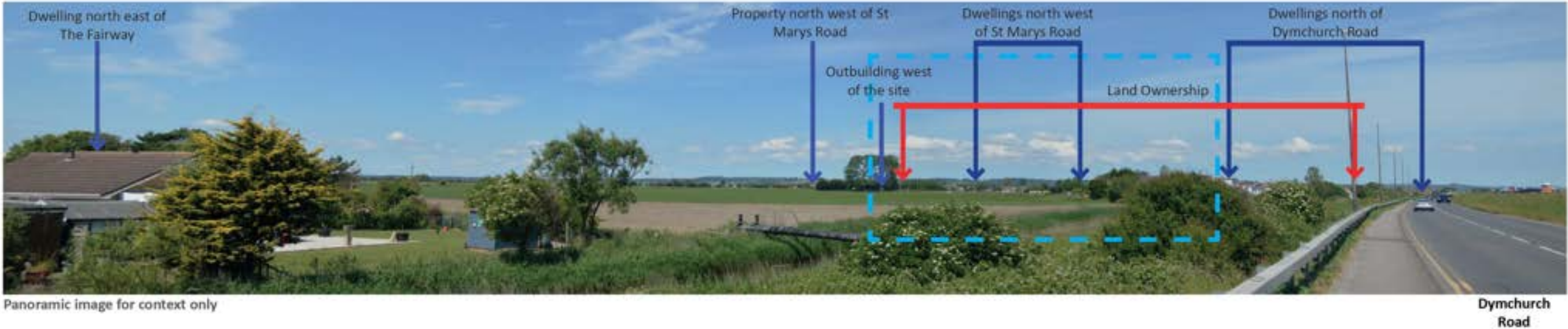
Time: 10:51

Camera height: 1.65m

Camera: Nikon DX D3200

Lens: AF-S 18-55mm

Locations of viewpoint ref: LVA Desk Study 2.10



SENSITIVITY OF RECEPTOR

SUSCEPTIBILITY TO CHANGE	HIGH	MODERATE	MODERATE to HIGH	HIGH
	MODERATE	LOW to MODERATE	MODERATE	MODERATE to HIGH
	LOW	LOW	LOW to MODERATE	MODERATE
		LOW	MODERATE	HIGH

Sensitivity matrix combining value of view with its susceptibility to change

Viewpoint information:

The overall Degree or Level of Effect for the development proposals as a whole can be seen in section 5

Indicates 50mm frame & 39.6° HFoV. This can be seen at 100% enlargement in section 6 of this report

Visualisation Type:

Projection:

Enlargement Factor:

Horizontal Field of View:

Direction of View:

Distance to centre of site:

1

Planar

See section 6

See section 6

196 Degrees from North

500m

Date:

Time:

Camera height:

Camera:

Lens:

13/06/2020

13:08

1.65m

Nikon DX D3200

AF-S 18-55mm

Locations of viewpoint ref: LVA Desk Study 2.10



SENSITIVITY OF RECEPTOR

SUSCEPTIBILITY TO CHANGE	HIGH	MODERATE	MODERATE to HIGH	HIGH
	MODERATE	LOW to MODERATE	MODERATE	MODERATE to HIGH
	LOW	LOW	LOW to MODERATE	MODERATE
		LOW	MODERATE	HIGH

Sensitivity matrix combining value of view with its susceptibility to change

The overall Degree or Level of Effect for the development proposals as a whole can be seen in section 5

Indicates 50mm frame & 39.6° HFOV. This can be seen at 100% enlargement in section 6 of this report

Viewpoint information:

Visualisation Type: 1
Projection: Planar
Enlargement Factor: See section 6
Horizontal Field of View: See section 6
Direction of View: 59 Degrees from North
Distance to centre of site: 200m

Date: 13/06/2020
Time: 13:24
Camera height: 1.65m
Camera: Nikon DX D3200
Lens: AF-S 18-55mm

Locations of viewpoint ref: LVA Desk Study 2.10

Residential Development | Land at High Knocke | Dymchurch | Kent | April 2024 |

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4.5

Design Development

Flood Risk and Drainage

Herrington Consulting were engaged by Redbridge Estates Ltd to provide a Flood Risk Assessment including Drainage Strategy, Exception Test and Flood Mitigation. They have been further engaged to update the report to the amended proposal for up to 125 dwellings adding swales and rain gardens to the indicative surface water handling proposals.

Background and Scope of the FRA Appraisal

Flooding is a major issue in the United Kingdom. The impacts can be devastating in terms of the cost of repairs, replacement of damaged property and loss of business. The objectives of the Flood Risk Assessment (FRA) are therefore to establish the following:

- whether a proposed development is likely to be affected by current or future flooding from any source
- whether the development will increase flood risk elsewhere within the floodplain
- whether the measures proposed to address these effects and risks are appropriate
- whether the site will pass Part B of the Exception Test (where applicable)

This appraisal has been undertaken in accordance with the requirements of the National Planning Policy Framework (December 2023) and the National Planning Practice Guidance Suite (August 2022) that has been published by the Department for Communities and Local Government. The Flood Risk and Coastal Change planning practice guidance included within the Suite represents the most contemporary technical guidance on preparing FRAs. In addition, reference has also been made to Local Planning Policy.

To ensure that due account is taken of industry best practice, this FRA has been carried out in line with the CIRIA Report C624 'Development and flood risk - guidance for the construction industry'.

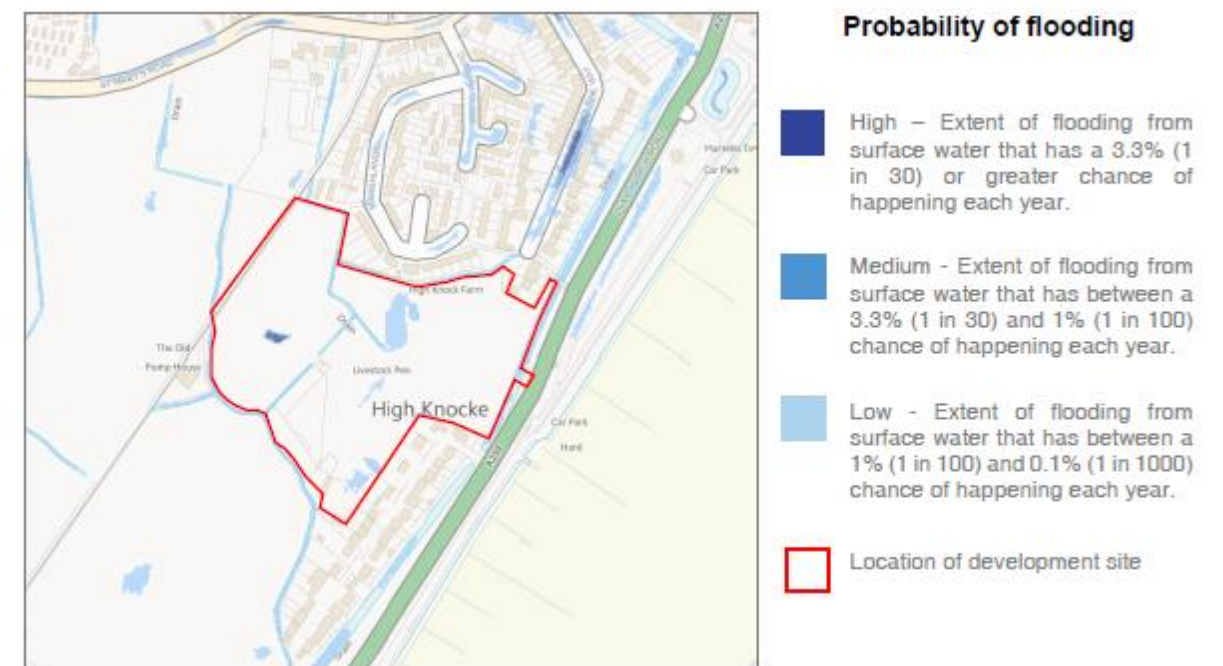
Conclusions and Recommendations of the Report

The overarching objective of this FRA is to appraise the risk of flooding at High Knocke Farm in Dymchurch, Kent to ensure that the proposals for development are acceptable in this location. In addition, the NPPF also requires the risk of flooding offsite to be managed to prevent any increase in flood risk as a result of new development. This report has therefore been prepared in accordance with the NPPF to quantify the risk and to provide recommendations for appropriate mitigation where necessary.

The proposals for development are for the construction of 125 new dwellings in Flood Zones 2 and 3, therefore, it will be necessary to apply the Sequential Test and Exception Test. Providing evidence in support of the Sequential Test is outside the scope of this report, although the information contained within this report can be used to support the test if required. The primary aim of this report is, however, to determine whether the proposals for development can pass Part B of the Exception Test.

The risk of flooding has been considered across a wide range of sources and it has been identified that the risk of flooding is low. The development site currently benefits from existing defence infrastructure, which provides a 1 in 200 year standard of protection over the next 100 years and therefore, it is only in the unlikely event that the defences were to fail that the development could be affected by flooding.

A copy of the fully updated Flood Risk Assessment has been submitted as a supporting document to this new outline planning application.



Environment Agency's 'Flood Risk from Surface Water' map shows the site is not at risk from flooding by surface water



Actual risk of flooding from overtopping of sea defences : Environment Agency's map of extent of flooding during a design flood event overlain onto the proposed site layout shows the site will not be susceptible to flooding unless there is an unlikely breach at the new Hythe sea defences that are designed to give 1 in 200 year protection

Sequential Test

Summary

The Sequential Test has been prepared by DHA Planning on behalf of Redbridge Estates Ltd following the identification of the site within Flood Zone 3 and assesses the site in the context of both the Sequential Test and Exception Test as required by national planning policy.

Conclusion

The Site is within Flood Zone 3, a comprehensive Flood Risk Assessment and Drainage Strategy has therefore been submitted within the Planning Application which should be read in conjunction with this Assessment.

The Sequential Test Assessment serves to consider whether there are any other reasonably available sites that are in an area of lower flood risk that are capable of accommodating the proposed development.

The Site represents an opportunity to deliver sustainably located housing within the Dymchurch area. It is considered that the Site demonstrates key characteristics that cannot be easily replicated elsewhere, it is highlighted from a review of the sites that much of the available allocated land is located within the New Romney area which whilst consistent with Local Planning Policy SS3, where the Local Plan identifies New Romney as the principal location within the Romney Marsh Area, it is noted that a balanced approach to delivery in the Area needs to be struck, in order to achieve proportionate growth for all settlements in the District settlement hierarchy.

High-quality sustainable development is key in securing the vitality and viability of settlement centres. In this respect, the housing needs and future viability of local businesses in Dymchurch, particularly in the context of its heavily tourism orientated role can only be suitably met by the delivery of proportionate, well-located growth in Dymchurch itself. The proposals represent a logically located Site adjacent to the existing settlement confines, is consistent with the predominant development pattern, is well-located in terms of public transport and active travel opportunities, and will assist in securing the vitality and viability of Dymchurch as a rural service centre. Further, the submitted FRA is clear that the overall Flood Risk of the Site can be considered as 'low'.

NPPF Paragraph 168 is clear that the Sequential Test is present to steer new development into areas with lower Flood Risk. Paragraph 169 is clear that where it is not possible for development to be located in areas with a lower risk of flooding, taking into account wider sustainable development objectives, the exception test may have to be applied. In this regard, this Assessment demonstrates that it is not possible to locate development in an area of lower Flood Risk and achieve the sustainable benefits set out above.

It is concluded that there are no suitable sites within the Romney Marsh Character Area that are available or capable of delivering a similar scale of development to that proposed at Land adjoining High Knocke Farm, Dymchurch, within five years. The Sequential Test is therefore considered to be passed.

In determining the outcome of the Exception Test, it is demonstrated that the proposal delivers significant planning benefits that cannot be replicated elsewhere and will support the role of Dymchurch as a rural centre in accordance with the first criterion of the Exception Test. It is also demonstrated that the development would be made safe for its lifetime without increasing flood risk elsewhere. This therefore satisfies the second criterion of the Exception Test, and the Exception Test is therefore considered to be met.

A copy of the full Sequential Site Assessment with Exceptions Test has been submitted as a supporting document to the outline planning application.

Sustainability and Approach to Energy Efficiency

The principles of Sustainable Development have been central to the development of the layout and design and reflect the Government's priority for addressing climate change.

This section addresses the sustainable design and construction issues in the nine categories of sustainable design indicating the approach facilitated in this outline application that will be carried through to the Reserved Matters.

Broader issues of locational sustainability and accessibility by alternative modes of transport have been addressed elsewhere in the Planning Statement and Traffic Assessment. Full ecological impact issues have been addressed within the supporting Ecological Assessment.

Energy & CO2 Emissions



- Good solar orientation, enabling optimisation of solar gain but controlling solar heat gain.
- Good solar orientation provides most efficient positioning of photo voltaic (PV) panels to provide a renewable energy source.
- High specification, thermally efficient glazing. Well positioned and sized windows providing good internal light levels and avoiding overheating.
- A fabric first approach with high levels of insulation within the walls, floor and roof above building regulation requirements utilizing enhanced robust details to prevent cold bridging.
- Low energy, LED, lighting throughout.
- Smart and Energy labelled white goods throughout (minimum standard of A+ fridges/freezers, A rated washing machines and dishwashers)
- Provision of resident cycle storage with an option for cycle charging point.
- Provision of intelligent active and passive electric vehicle charging points to make best use of available energy.
- Longer lasting and better functioning products which need to be replaced less frequently, reducing the impact of producing replacements
- Low carbon air or ground source heat pumps are the likely heating solution with smart, energy saving controls and monitoring.
- The heat pumps would be combined with mechanical ventilation and heat recovery systems that ensure as little heat as possible is lost through ventilation.

Water Usage



- Low water use sanitary appliances to reduce the amount of water consumed by the development.
- Low water usage kitchen appliances.
- Inclusion of water butts considered

Surface Water Run-Off



- Sustainable drainage system planned for the development reducing existing run off from a greenfield site situation minimising the likelihood of local surface water flooding making it less likely than the current situation.
- Swales, ditches, and raingardens and other natural attenuation solutions are proposed.
- As well as being storage for surface water run-off they provide opportunities for habitat creation and improving biodiversity

Materials



- Low impact materials which are non toxic, sustainability produced or recycled which require little energy to process.
- Design for reuse and recycling

Waste



- Each kitchen will have recycling storage.
- Construction waste management to be controlled by Construction Environmental Management Plan.
- Areas provided for recycled materials collection



Health and Wellbeing

- Daylighting: well positioned glazing providing good internal light levels
- High levels of sound insulation will be achieved as far as possible
- Good size private garden spaces provided for all houses
- On site recreational opportunities including Childrens play spaces, nature walk, circular exercise route



Management

- Considerate construction principles and construction site impacts controlled through the Construction Environmental Management Plan
- Development phased to control and reduce impact on local community



Ecology

- Vegetation and planting throughout the site.
- Biodiversity enhancements provided such as bird/bat boxes on buildings



Adapting to Climate Change

- The proposals include measures to adapt to climate change, such as the provision of green infrastructure sustainable urban drainage systems, open spaces and drought resistant planting/landscaping

General Statement on Sustainability, Energy and Carbon Reduction

This statement is provided following the refusal of the first earlier outline planning application to clarify, confirm and further the Applicants and proposals commitment to sustainability at all levels.

Further to the stated goals of the first application we will aim to make the dwellings as close to net zero enabled as we possibly can. This will be achieved with a fabric first, well insulated envelope of low carbon, modern method of construction(MMC) coupled with sustainable heating provision via air source heat pumps coupled with mechanical ventilation and heat recovery(MVHR) systems so the heat that is created is not lost. The dwellings will be aimed to achieve an A rated EPC.

There are already options that can be selected by home owners for low carbon and sustainable electricity provision, such as supplied by wind and solar power. There is currently significant acceleration in provision of this form of energy that can be coupled with photo voltaics providing some of each dwellings energy needs through a renewable source. By the time these dwellings are constructed it is envisaged that low carbon energy will be readily available to not only provide heating, but power for charging of electric vehicles as well.

Future home owners will be encouraged to use green energy. There will be clear information in the homeowners pack spelling out how their properties support sustainable living and how they can be net zero carbon when the right energy supplier is used.

It would be unreasonable and difficult to restrict a future owners choice regarding energy tariff, particularly with recent events and the significant rising of energy costs. Therefore, the most effective way to introduce them to zero carbon energy is to make the first electricity supply to the dwelling a zero carbon energy choice. The occupiers can then make the decision to ‘switch’ if they wish.

A full gambit of smart, energy saving devices will be incorporated. There will be smart heating controls, smart and rapid electric vehicle charging points that can utilise off peak electricity, and the option of smart white goods could be offered. If properties are purchased off plan early enough, there could be the option of incorporating batteries to store the PV produced electricity so more of it can be used within the dwelling creating it.

Designing out Crime

The Applicant has consulted with the Design for Crime Prevention document as produced by Kent Police. The 7 key attributes of good design have been incorporated within the final submitted design which include:

1. Access and Movement: the development has been designed to incorporate well defined routes, spaces and entrances for convenient movement without compromising security;
2. Structure: the design has been structured so that different uses do not come into conflict;
3. Surveillance: the design incorporates areas where all publicly accessible spaces are overlooked;
4. Ownership: designed to promote a sense of ownership, respect, territorial responsibility and community;
5. Physical Protection: places that include necessary, well designed security features; windows and doorsets to comply with PAS24:2012 (Annex A and B for doors and Annex C for windows) and to conform with approved document Q of the new building regulations from 1st October 2015, where applicable.
6. Activity: Places where the level of human activity is appropriate to the location and creates a sense of safety at all times;
7. Management and Maintenance: places that are designed with management and maintenance in mind, to discourage crime in the present and future

By engaging with Kent Police the applicant is committed to ensuring the principles of Crime Prevention through Environmental Design (CPTED) are adopted throughout the built scheme.

The Designing out Crime Officer for Kent of the Designing out Crime Team has given ongoing consultation regarding the layouts design. After several communication exchanges and amendments made to the design, the current layout was approved with all issues cleared.

They recommended that the following appropriate items should be included within the final proposals at the reserved matters application.

1. Perimeter, boundary and divisional treatments must be 1.8m high. Any service paths/ alleyways, if proposed, must have secure side gates which are lockable from both sides, located flush to the front building line to optimize surveillance.
2. Parking - To help address vehicle crime, security should be provided for Motorbikes, Mopeds, Electric bikes and similar. SBD or sold secure ground or wall anchors can help provide this
3. All parking areas must be covered by natural surveillance from an “active” window e.g. lounge or kitchen and sufficient lighting.
4. Provision of appropriate signage for visitor bays to avoid conflict and misuse. If the visitor bay is more convenient than the allocated bay, it will be used instead.
5. New trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than “round shaped” trees with a low crown. New trees should not be planted within parking areas or too close to street lighting.
6. Any hedges should be no higher than 1m, so that they do not obscure vulnerable areas. If hedges are not maintained, visibility from the active window will be restricted.
7. Corner properties require defensible spaces to avoid desire lines that can cause conflict. This can be provided by planting of prickly plants or knee rails/ fences, for example.
8. Lighting. Any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. Bollard lighting should be avoided, SBD Homes 2019 states: “18.3 Bollard lighting is purely for wayfinding and can be easily obscured. It does not project sufficient light at the right height making it difficult to recognise facial features and as a result causes an increase in the fear of crime. It should be avoided.”
9. Lighting of all roads including main, side roads, cul de sacs and car parking areas should be to BS5489-1:2020 in accordance with SBD and the British Parking Association (BPA) Park Mark Safer Parking Scheme specifications and standards.

10. Play areas must have a self-closing gate to keep animals out and ensure young children cannot leave the area unsupervised. Play equipment must be vandal resistant (and if made of wood, fire resistant) and not provide areas of concealment or an informal storage area for offenders or materials of crime. The examples of equipment used within the plans are recommended, as long as the mound does not prevent children being overseen. We recommend the sales team advise potential buyers of the plots close to the play area of its location, which would otherwise be missed from the plan. By informing them at this stage, this reduces the possibility of future conflict and/or noise complaints.
11. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation and locks) including folding, sliding or patio doors to meet PAS 24: 2016 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please Note, PAS 24: 2012 tested for ADQ (Building Regs) has been superseded and is not suitable for this development.
12. Windows on the ground floor or potentially vulnerable e.g., from flat roofs or balconies to meet PAS 24: 2016 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes.
13. Cycle Storage, if proposed, must be well lit and lockable. We advise on the use of ground/ wall SBD or sold secure anchors within the cycle storage area and sheds of dwellings.
14. It is recommended that SBD TS008 letterboxes are utilised for dwellings.

When the design for reserved matters is worked up, reference to this document will ensure that these recommendations are implemented where appropriate.



5.1

Public Consultation Approach

Executive Summary

Redbridge Estates Ltd are committed to consulting with the local community regarding the proposed mixed residential development with affordable housing on land known as High Knocke Farm, Dymchurch.

Consultation has included discussions with local councillors, local residents, businesses and interested organisations. In addition, discussions have been held with Folkestone and Hythe District Council.

The applicant has sought to engage with key stakeholders throughout the pre-application and consultation phase.

Pre-application consultation with the local community has included:

- An exhibition/meeting with Dymchurch Parish Council
- An open public exhibition

Throughout the pre-application process, the Applicant employed a variety of methods and approaches in accordance with best practice. The evolution of the scheme clearly demonstrates that the local community influenced the final submitted design.

The list of consultees has included the following:

- Folkestone and Hythe District Council
- Dymchurch Parish Council
- Local Residents
- Kent County Council Highways Department
- The Environment Agency
- The Romney Marsh Internal Drainage Board
- Kent Police Designing Out Crime Officer

Introduction

The following constitutes a Statement of Community Involvement (SCI) which provides additional information in support of the planning application submitted on behalf of Redbridge Estates Ltd ('the Applicant') for the proposed residential development of land at High Knocke Farm, Dymchurch ('the Site').

This report describes how the local community has been consulted and details the feedback received. A number of further technical consultations have also taken place. Whilst not referred to in this report, these technical consultations have assisted in the evolution of the scheme and are referenced separately in the supporting technical reports.

Folkestone and Hythe District Council's Statement of Community Involvement (SCI)

Folkestone and Hythe District Council encourages developers to consult the community prior to submitting planning applications for larger-scale or potentially contentious development proposals.

Pre-application consultation provides an opportunity for applicants and developers to find out the views of local residents about their development proposals, and allows the local community to make suggestions which can then be taken into account by the developer in finalising their planning application. This process can help to reduce local opposition, help resolve early design and development problems and ensure that high quality planning applications are received.

The Council expects applicants in most cases to carry out their own pre-application consultation. This should be effective in bringing draft proposals to the attention of the public, the local Town or Parish Council and other affected parties and provide opportunities to make comments. Effective ways of doing this include public exhibitions, workshops and other forums providing specific opportunities for comments to be made.

Folkestone and Hythe District Council expects applicants to submit details of pre-application consultation as well as an explanation on how the responses have been taken into account, alongside their planning application. The Council will consider this information prior to making a decision.

Summary Of Community Involvement Aims

The Government has made it clear through the National Planning Policy Framework (NPPF) that developers should be encouraged to undertake public consultation.

Paragraph 39 entitled 'Pre-application engagement and front loading' states:

'Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.'

Paragraph 40 of the NPPF continues:

'Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.'

The community involvement process has been designed so that residents take an active role in the evolution of the proposal and that their feedback genuinely influences the scheme prior to a formal planning application being lodged with Folkestone and Hythe District Council.

Consultation Process

The Applicant designed a consultation strategy that is NPPF compliant and that satisfies the requirements of Folkestone and Hythe District Council’s SCI. The Applicant executed this strategy during 2021.

It is evident that following feedback from key stakeholders, the plans that have been submitted have been amended to reflect the comments received.

The following is a review of the key public consultation events to demonstrate the community involvement that includes:

- The Parish Council Consultation Exhibition Event
- The Public Consultation Exhibition Event

Parish Council Consultation Exhibition Event

On 19th May 2021 the first Parish Council consultation exhibition event was held in the evening at a private office with exhibition space central to Dymchurch.

The Parish Council were provided with a presentation both as a projected display and as development proposal information packs. It included a summary of the how the project had progressed to the layout at the time with commentary on the suite of reports that are to support the planning application, an opportunities and constraints/diagram, parameter type plans and the landscaping masterplan.

The parish councillors that attended were:

Councillor McCreedy, 2 x Councillor Young, Councillor Williams and Councillor Coker.

The project’s development and design process were described in detail so that the participants were made aware of how the indicative layout had evolved and the reasoning behind it.

Questions and observations were invited during the delivery of the above and afterwards. A number of discussion points were raised throughout the presentation leading to the Councillor’s obtaining a good insight to the project as a whole. The feedback from this event is included later in this report.

Overall the Parish Council (PC) were very pleased with the scheme so far and felt that it would enhance Dymchurch.

The representatives from the design team that were in attendance and available for discussion were as follows:

William Moss, Redbridge Estates Ltd
Craig Dobson, RDA Architects
James Reuther, RDA Architects
Michael Crook, RDA Architects

Public Consultation Exhibition Event

On Wednesday 14th July 2021 between 10am and 4pm the first public consultation exhibition event was held at The Peter Sloper Room, Dymchurch Village Hall, 6 Orgarswick Avenue, Dymchurch, TN29 0PU.

The applicant undertook a public exhibition showing plans of the site, technical details and draft images of the proposed mixed use development. The primary purpose of the exhibition was to engage with local residents and stakeholders, providing the opportunity for them to view and comment on the draft proposals.

The meeting was advertised as follows:

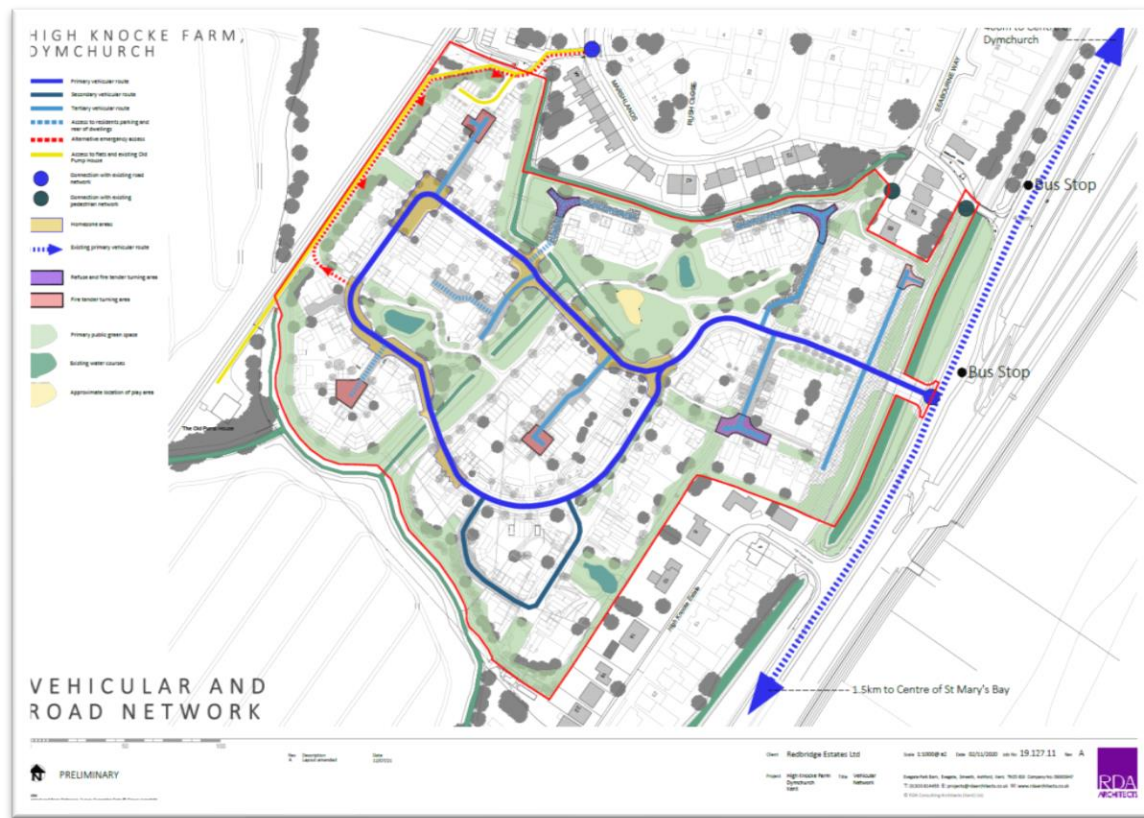
- The design team liaised with Jeff Lawrence (Parish Clerk and Responsible Financial Officer) in respect of Notices being displayed on Notice Boards around the village.
- The Notices let members of the public know ‘An exhibition to the public of the proposal was to take place in the Peter Sloper Room at Dymchurch Village Hall between 10am - 4pm on Wednesday, 14th July 2021’.
- Notices were sent to Jeff Lawrence on 11/6/21. The Notices were put up shortly after this date.
- Jeff Lawrence confirmed the Notices were displayed on Notice Boards at 4 prominent locations being: Redoubt Estate, Fairway, High Street (by the Fun Fair), and Dymchurch Parish Council’s office. These are places regularly used for notification of events within Dymchurch and where residents would expect to find this type of information and proven to raise awareness in the community.
- The Notice was also displayed in the Post Office window shortly after 11/6/21.
- The Notice was uploaded onto the Dymchurch Parish Council web-site shortly after 11/6/21.
- It was organised that the Notice was also to be included in the Dymchurch Parish Council Newsletter, but unfortunately there was a delay in the Newsletter being distributed.

The information at the consultation exhibition event was presented as drawings and a via screen projection. It included an indicative layout/masterplan, an indicative landscaping masterplan, an opportunities and constraints plan and several diagrammatic plans/parameter drawings explaining the design and how it was developed around the existing landscape with ecology in mind.

The exhibition was well attended with over 100 people taking part over the day with 4 representatives from the design team; Redbridge Estates Ltd, RDA Architects and HW & Co. Landscape Architects being available for discussion all day.

Boards displayed at the consultation





5.2

Public Consultation

Feedback

Feedback from the Parish Council Exhibition Event/Meeting

- The PC appreciated and liked the openness of the scheme. They noted that the overall density ratio was good and spacious, allowing for lots of green spaces and that it was a relatively small development that was sensitive to the village and matched it in approach.
- They could see and noted that we had not created a high-density scheme, which would not have suited the character of Dymchurch. They felt the layout had a community feel about it and that it flowed well.
- The PC were positive towards development in general, but said that it needs to be the right sort and controlled development. Generally, they would like to see more schemes to attract new people to the area to help boost the Dymchurch economy. This proposal was an example of the right sort of development for Dymchurch in their view.
- They stated that Dymchurch is just emerging from the covid situation with businesses picking up but they need the added support of an extended community. Councillors could see very positive benefit of the development in that regard.
- Development would bring added prosperity boosting local businesses in the area both immediately, whilst construction in progress, and long term from an increase of residents and visitors.
- The number of dwellings proposed would require CIL payments/s106 contributions which would go towards local facilities and services like road improvements, libraries, schools, and health provision depending on the need established by KCC. The PC appreciated the benefit the development would bring in this regard and felt that extra money would be useful and bring benefits to Dymchurch.
- They suggested that the local children from the new development could be encouraged to use the nearby recreation ground and support new children's football group which they are trying to promote for its positive influence.
- They floated the idea of the provision of a community space/building quickly moving on to suggest an outdoor community space with seating as a main focus.
- The question was asked - will it be a private estate? Possibly a view to it being a gated community? They were assured that the development would be open for use to all and a public accessible development with adopted highways and public open space including recreational paths and cycle ways.
- The maintenance of public spaces was questioned and it was suggested that a management company could be set up later down the line to manage and maintain them. Each dwelling would pay a small service charge for this.
- The PC were pleased to see existing watercourses maintained and made a feature of the layout with active frontages overlooking these areas for security and aesthetics.
- They were not too concerned with one key access point as provision has been made for a secondary emergency access at a place agreed acceptable to them off Marshlands. They agreed that the site access was in the most sensible location.
- They agreed that the site is in a suitable sustainable position being close to the heart of the village positioned to infill with housing due to the neighbouring residential development, High Knocke Estate, already present.
- They were pleased to see lots of possible recreation walking routes in and around the edge of the site, with views out to the countryside, maintaining a rural feel.
- RDA Architects confirmed that the green open spaces within the site would always remain as such.
- They liked the number of pedestrian connection points with the existing community and Dymchurch. They commented that the main footpath along the A259 at this point is quite wide so will be easy to walk into the centre of the village.
- They were accepting that most of the dwellings would be at least 2 storey and could see and appreciated the reasoning of putting 3 storey units perhaps fronting the sea on the eastern side of the site.
- Energy use/sustainability was queried and they were informed that all the houses would be energy efficient with high insulation, renewable technology such as PV and potential air source heat pumps for heating due to the phasing out of gas.
- Services were queried in respect of sufficient supply. It was indicated that there is overhead three phase high voltage supply convenient to the site. A new substation may be required. That would be defined as the project develops but not required as part of the planning application.
- The convenient available position of an existing public sewer serving Marshlands was highlighted confirming that there would be no connection issues following capacity being established.
- They understood and appreciated that we have considered flooding risk, ecology, landscaping, and biodiversity. RDA Architects emphasised that these items have been thoroughly considered.
- They questioned flood measures and were informed that houses would sit no lower than an agreed level set above anticipated 200-year flood level in line with the Flood Risk Assessment.

- Concern was noted that a similar local development, that imported and exported soil, caused many unnecessary lorry movements impacting on the village. The Applicant was questioned about any raising of site levels and responded that the houses have been located, where possible, on the higher areas of site. Where that was not possible localised raising of site levels, using minimal amounts of soil, would be required to access groups of front, level threshold, entrances of the houses. It was explained that the aim would be to import as little soil as possible keep lorry movements to a minimum.
- They agreed that phasing of the development will ensure that reduced pressure is put on local highways network limiting disturbance during construction.
- Councillors made it clear that they would like to see a pedestrian crossing on the A259 outside of the application site.
- They wanted clarification on how the potential additional vehicle use would impact Dymchurch as during the summer months the roads can become busy with extra visitors to the area. RDA Architects stated that an initial transport assessment had been carried out and that there is predicted capacity. However, KCC Highways would not yet permit traffic surveys to be carried out as true traffic levels could not be established during the Covid pandemic so a conclusion could not be established at the time.
- They would like to see the 30mph speed limit extended from Dymchurch village centre to beyond the proposed main access to the proposal. It is currently 40mph.
- They indicated a local need for housing was established by the housing destined for the recreation ground. It was overturned by the current PC committee due to inappropriateness of the development site being a community asset. Hence them welcoming a more appropriate site. They indicated a desire for affordable housing and we confirmed that a proportion of the development would be such in line with affordable housing policy.
- The PC initially indicated a preference to see the affordable housing spread around the site. RDA Architects stated that the part of the site where most of it is located is in a prime location with views out to the fields with good walking/cycling access to the facilities in Dymchurch. The affordable housing would also not be cut off or designed differently but incorporated into the rest of the development so there is no feeling of segregation. They agreed with this.
- A general observation was made by one councillor concerned that affordable housing is not really affordable. We responded that there is a need to look at types of tenure to ensure the best combination of options for the location are offered.
- They highlighted an issue with visitors parking in summer. ‘Cars are left everywhere’ in many inappropriate places so there is a need to look to manage this eg. parking restrictions etc. Knee rails or short bollards are needed to the edge of green spaces to prevent parking in undesirable locations.
- They thought it important for the Applicant to organise presenting the scheme to the wider Dymchurch community and they offered to assist with it.
- After the presentation it was suggested that the councillors were all very positive about the proposal and they supported it. It seemed to be agreed by all



Feedback from the Community Consultation Event

There were many comments raised with many repeated which have been amalgamated and summarised below:

- The most questions raised related to the medical centre/doctor’s surgery. There is concern that the current provision is poor and that further housing in the Village will add to existing problems. The response was that if it was identified that any provision was lacking in the area to serve the new development then planning contributions will be required from the developer which would aid provision for the existing community.
- An affordable housing need was raised by many confirming the Parish Council’s thoughts. It was confirmed that provision at least up to policy requirements within the development would be included. It was indicated on the plan a likely location to the north west corner but that this is not fixed.
- Pressure on supply of school spaces was raised by some. Again, planning contributions will ensure provision related to the site’s projected requirements by Kent County Council.
- Daytime car parking in the summer is a particular local problem with day trippers. It is not seen how the proposal will cause any further problems here. However, a strategy is in place to prevent cars parking where not desired. It was clarified that 40+ visitor spaces have been provided and the site will be designed to deter parking on the street with verge planting and single width roads with passing points. Every private dwelling will have at least 2 spaces in line with planning policy requirements.
- The provision of a pedestrian crossing on the A259 was well received and wanted. Regarding the access into the site, people were concerned that it will be hard to turn out of the junction as it is thought that drivers ignore the 40mph. We stated that we are liaising with KCC Highways regarding the design of the new access junction and pedestrian crossing. A resident stated that traffic lights would slow down their journey and would make the roads worse during summer months and it was sensed that there was reluctance for a set of traffic lights at the proposed main access.
- The excessive speed of the users on the A259 was raised by many. The idea of extending the 30-mph speed limit further out from Dymchurch Village centre to beyond the proposals main access was put forward by some and shared with others and this was well received. This idea would be promoted with authorities via the proposal.
- A couple of the residents of Marshlands were also not happy that they would lose their view. They were very pleasant people and said they knew that there was always the potential for High Knocke Farm to be developed.
- Some residents of Seabourne Way objected to the idea of there being a cycle and pedestrian access into the development from their road. It was suggested that, even though this link was a sensible provision for the development as a whole, it would be considered not to include it unless the planning authority insisted on it. The link is legally possible to establish through ownership and title access rights associated with the Applicant.

- Residents of High Knocke and Marshlands, that back onto the site, had concerns about the proximity of new dwellings. It was indicated that there might be scope to move the dwellings relatively near to these existing properties further into the site to create a wider buffer and separation distance.
- Some residents suggested that the site occasionally floods in lower parts that could impact on the development. However, it was clarified that a FRA had been carried out dismissing this as an obstruction to safe development and also dismissing the more serious issue of flooding via sea overtopping. Following explanation, they seemed content that due consideration had been given to flooding by Herrington Consulting, the flood and drainage specialist consultants for the proposal, with minimum floor levels set 300mm above the 200 year predicted flood level.
- Many locals enquired about the site’s access and were assured that a new access directly from the A259 would be built with no primary access via High Knocke or Seabourne Way. The existing access to the pump station will be maintained and used for emergency access only.
- There was general misconception from historical rumour that the few depressions that are in the field were as a result of WWII bombing. That was dismissed referring to the Archaeological desk top study confirming that they are just ponds. The nearest bomb craters were under High Knocke estate and are now built over.
- One couple felt strongly about the way the public exhibition was advertised and said they felt that a leaflet drop should have taken place on the two most affected roads - Marshlands & High Knocke. However, the approach was aimed at a whole community response for a wider balanced view.
- A number of the attendees enquired about the proposed timing of the project assuming that approval would be forthcoming. They wished to know when the development is likely to commence and an anticipated completion date. One member of the public wished to know how he should go about reserving a plot. We were, of course, unable to be specific on timings. We conveyed that we wished to listen to all comments made at the public exhibition, and would make adjustments to the scheme accordingly.
- Overall, it was thought that very few people could find fault with the scheme itself putting the principal of housing development on the site to one side. They were generally complimentary of the scheme and were interested in the design process it went through.

Combined Response and resulting Scheme Amendments following the Community Consultation and Parish Council Exhibition Event/Meeting

The design team who attended the meetings met with the Applicant to discuss the design response to the primary issues raised at the public consultation and Parish Council meeting. The 13 items of action that were decided to be worked into the proposal are as follows demonstrating that the local community have been listened to:

- 1) Move the dwellings/building line, units from 32 to 43, further away from the High Knocke Estate boundary to give an increased buffer and separation distance.
- 2) Remove the path that will improve the security of the design with regards to designing out crime.
- 3) Consider making it an enhanced ecology area to improve biodiversity.
- 4) Disconnect the cycle and foot paths from the end units to Seabourne Way.
- 5) Move unit 7 towards road away from 65 Seabourne Way. Re-distribute/re-plan units 1-3 to give 2-3 metres additional separation from new dwellings.
- 6) Accommodate within the layout a metre strip of land to 65 Seabourne Way to allow its boundary fence to be moved away from the dwelling.
- 7) Remove the garages to units 123, 124, 129, and 131 to the north of the development increasing the apparent separation of the new dwellings from Marshlands.
- 8) Draw back the development from the north boundary by 2-3 metres to provide a wider buffer.
- 9) Indicate provision of restrictions such as knee rails, bollards or other landscape features to stop parking on the soft landscape areas as already agreed with the Parish Council.
- 10) Demonstrate more clearly the social/affordable housing element to the development.
- 11) Commit to providing a pedestrian crossing and encouraging KCC Highways to extending the 30mph speed limit. This could be pushed forward in conjunction with a request from the Parish Council.
- 12) Make a commitment to ensure that the ditches are cleared out and maintained which will help alleviate garden flooding of existing houses in Marshlands to the north west of the site.
- 13) The Parish Council desired an outdoor congregational seating area for groups to gather. Landscapers HW & Co. to establish the best way to incorporate this within the landscape design.

Further Community Engagement Following Refusal by Committee

In the spirit of good communication and following the refusal of the previous application ref: 21/2525/FH the Applicant reached out to the Parish Council to update them and obtain their opinion on ideas to make the proposal more acceptable to them and discuss some improvements that we had in mind. However, they declined the invitation that was made on behalf of the Applicant at a Parish Council meeting.



6.1

Design Assessment

Use

Existing Use

The site is currently in use as grazing pastureland for a small scale farm which has been the use for a significant period of time.

It is primarily used for the grazing of sheep.

The site is currently undeveloped with the exception of a small range of insubstantial farm sheds to the west.

Proposed Use

The proposed use is residential including market and affordable/social housing complete with a road/access network and public open space. The public open space includes ecological, recreational and general landscape areas.



6.2

Design Assessment

Amount

The proposal is for 125 mixed dwellings.

An indicative accommodation schedule is shown below:

2b4p flat –	15
2b4p house –	22
3b5p house –	48
4b7p house –	40

From the indicative accommodation schedule the 125 dwellings would provide 668 bed spaces.

It is proposed that the gross internal floor area and space provision of each dwelling will be at least to the requirements of the Technical Housing Standards – Nationally Described Space Standard.

The area of the site is approximately 6.6 hectares.

The density of the development is 19 dwellings per hectare.

28,000m² or 2.8 hectares of that space is public open space for recreation and ecology. That amounts to approximately 40% of the site with additional landscaping to other spaces.

The provision of open space based on the above figures and indicative accommodation schedule equates to more than 4 Hectares per 1000 head of population.

Parking

Parking is in line with current vehicle parking policy standards.

Car Parking

Every dwelling has 2 allocated car parking spaces with visitor spaces at the rate of 0.2 parking spaces per dwelling plus additional visitor spaces associated with the tandem parking at the rate of an additional half a space for each tandem instance.

The table below shows the amount of parking provided

Allocated Dwelling Spaces:	125 x 2 = 250
Visitor Spaces (v):	0.2 x 125 = 25
Tandem Extra Visitor Spaces (t):	0.5 x 24 = 12

There are a total of **287** car parking spaces shown on the indicative layout.

Cycle Parking

Cycle parking will be provided at a rate of 1 secure and covered space per bedroom.

For houses it will be provided within a garage or in an ancillary store within the rear garden.

For the flats it will be within a communal cycle store.



6.3

Design Assessment

Layout

The submitted indicative layout has been developed responding to a significant group of defining factors some of which are listed as follows:

- The Landscape Visual Assessment and its recommendations.
- Maintaining of existing ecological features including ditches and ponds.
- Ecological factors including mitigation and biodiversity measures.
- The flood risk assessment indicating; safe floor levels, appropriate areas of site for development and flood mitigation measures.
- Highways and access requirements as defined by the transport assessment and KCC Highways consultation.
- Input from the Kent Police Designing out Crime Team.
- Community involvement including the Parish Council.
- Input from other stakeholders including the Local Planning Authority, Environment Agency and the Romney Marshes Area Internal Drainage Board.
- Local and national planning policy and design guides.
- All of the site-based influences as defined on the opportunities and constraints drawing.
- The reasons for refusal of the previous application.

Influences of each discipline on the design is discussed in the various sections of this statement.

The indicative layout has a main circulatory loop road from the new bridge/junction access off the Dymchurch Road to the east of the site as the main distribution. It is designed to give priority to pedestrians and cyclists with shared spaces and to limit the speed of traffic within the development to a maximum of 20mph.

Off that loop, and to the east, is located the emergency access utilising an existing driveway which is accessed off Marshlands. The access network is designed with a hierarchy of varying street types. These vary with character area, level of importance and area of site served breaking down to a number of small private drives.

Generally, the dwellings are arranged so that they look towards the perimeter of their character area and over the landscape space between or to the edge of the site. This is so an active frontage is presented to these key community areas also promoting security from a monitoring perspective so all areas are as safe as they can be by design



Scale

Dymchurch is a village of significant size which stretches nearly 3 miles along the A259. It has a population of approximately 3,750. Although this proposal is not insignificant, it represents a relatively modest and proportionate amount of growth in both population and area.

The proposed indicative layout has several character areas separated by belts and areas of landscape reducing and minimising the scale and impact of the development as a whole.

The proposed scale of the dwellings will aim to follow the prevailing scale and character within the local area. This also reflects the location at the edge of the settlement where scale and massing are important considerations.

The houses will be predominantly two storeys in height to eaves but with room utilised within some of the roof spaces. They are organised mainly as either detached or semi- detached with limited flats and terraced buildings in a loose informal arrangement. This characteristic allows the buildings to have space around them which gives the new development the open, rural character required of this location.

As all proposed dwellings are separated by distance and landscaping from existing periphery housing to the village edge, the proposal is unlikely to have any impact of an overbearing or overshadowing nature. Significant separation distances and positioning ensures that there will be no possibility of overlooking.

The preceding outline planning application, ref: 21/2525/FH, upon which this improved proposal is based, raised no issues relating to scale in the report recommending it for approval, either as a whole or of the individual units.

However, as a result of the reason for refusal, made by the committee, several design changes have been made to reduce the apparent scale of the development and its impact on the open countryside as follows:

The dwelling numbers have been reduced from 132 down to 125. Although a modest number, the removal of those units has maximum impact allowing us to;

- open up the scheme with large vista perforations further separating groups of dwellings,
- increase the already significant public open space in the centre of the site, and
- give the perimeter significantly improved tree screening making it less impactful when viewed from all sides, but particularly at the front of the site where viewed from the Dymchurch Road.



6.5

Design Assessment

Landscaping & Ecology

This statement accompanies an outline application and as such detailed design is yet to be prepared. The landscaping will be fully considered and designed in detail at reserved matters stage. Any illustrations included in this document are therefore purely illustrative and act as a suggestion of landscape design.

However, an Indicative Landscaping design, shown on the landscape Masterplan, has been carefully created and submitted in support of this application which sets out a good set of principles for the final design to follow.

We feel those general principles are appropriate for the location and that a detailed design based on them would provide a heavily landscaped area that will be good to live in.

HW&Co worked closely with RDA Architects on the findings of the LVA and ecology surveys to develop a landscape and ecology led site plan which retains important landscape and ecology features, enhances boundary vegetation, conserves views out from the site into the open countryside whilst providing significant screening of the development from the open landscape into the site.

The existing drainage ditch network and ponds have been retained being aesthetically and ecologically enhanced providing; pleasant green backdrops and spaces throughout the development, recreational opportunities and also increasing biodiversity site wide.

The key elements of the landscape design are;

- A large public open space central to the site off the main approach with open community meeting space, children's play/activity areas and community sculpture.
- Edge of countryside landscape buffer and development screening providing enhanced ecological features in conjunction with existing ditches.
- Significant front of site screening.
- Green fingers linking the internal landscape areas to the wider landscape beyond the site.
- Various landscape buffers to the perimeter of the site to protect existing resident amenity and provide visual masking of the development from countryside.
- Landscaping reinforcement and ecological improvement to the existing ponds and ditches.
- A perimeter recreational path as part of an extensive path and cycleways network
- An informative ecology/nature walk.

It is accepted that there will be a condition attached to any planning approval which will need to be complied with regarding the provision of a full landscaping proposal via a Reserved Matters Application. It will be worked up hand in hand with the architectural design.

There are no trees with TPO's on the site and there are no significant trees within the development zone that will be affected by the construction works. There are trees to the periphery of the site in the north west. However, they will not be impacted by the development.

A copy of the landscape Masterplan is submitted as part of the outline planning application.



Ecological Compensation and Bio Diversity Enhancement Measures

The Ecological Impact Assessment makes suggestions regarding Ecological enhancement measures that may be included as part of proposals. They are outlined below.

Ponds

The retained ponds will be enhanced through deepening ensuring that they retain some water through-out the great crested newt breeding season.

Tree and Shrub Planting

Proposals will include significant additional native tree planting to benefit nesting birds and foraging bats, amongst other species, particularly around the boundaries of the Site. Trees suitable for wetland soil conditions such as willows, downy birch and alder will be included within the planting. Trees that produce fruits, such as Prunus and Sorbus species, will provide additional foraging habitat for birds within the locality. Flowering species, such hawthorn, privet and rose would provide opportunities for nectar feeding invertebrates, such as bumblebees, hover flies and butterflies. Creation of these habitat feature would also benefit bats by providing additional foraging habitat, and birds through additional nesting habitat.

Native and Nectar Rich Planting Plan

Planting plans around the new buildings will include native, flower rich species, including those that flower in the late and early seasons to enhance the biodiversity value of the site. The inclusion of climbing plants will add sheltering opportunities for invertebrates and birds. They can also produce nectar rich flowers for butterflies, bees and hover flies and fruit for birds and small mammals. The inclusion of herbs, such as lavender and sage, will provide nectar for an array of invertebrate species, including bees, butterflies and moths. Providing a range of herb plants would ensure flowering throughout the seasons. The inclusion of plants that produce scent at night will attract night flying invertebrates and as such would also provide foraging opportunities for bats.

Wetland Planting

Additional bankside planting of the ditches and ponds will include a variety of marginal species, but be dominated by reed sweet-grass (*Glyceria maxima*), branched bur-reed (*Sparganium erectum*) and yellow flag iris (*Iris pseudacorus*). Typha spp. and Phragmites spp. planting will be avoided. Planting will extend at least 2m back from the top of the ditch banks.

General Biodiversity

The indicative layout has been designed by the Landscape Architects to include scope for ecological improvements as above that could allow a future reserved matters landscape design and planning application that is capable of achieving 10% net gain biodiversity as proven by the submitted metric.



Landscape plan above – Wetland and Public Open Space

Appearance

We envisage a modern reflection on a strong Kentish vernacular using a pallet of materials including clay stock brickwork, render, weather boarding, clay tile hanging, slate and clay tiled roofs varied with the design over each character area. The aim is to provide a separate sense of place to each area but an overall coherence to the whole development that is woven together with the generous landscape design.



6.7

Design Assessment

Access

It is proposed to create a new dedicated main access point to the site off the A259 Dymchurch Road with the principle already agreed with KCC Highways and the Environment Agency.

Access is to be a reserved in the outline planning application. However it is envisaged that the main access point will be off the A259 and the secondary/emergency access via Marshlands as shown in the indicative layout.

The indicative layout has a main circulatory loop road from the new bridge/junction access off the Dymchurch Road to the east of the site as the main distribution. It is designed to give priority to pedestrians and cyclists with shared spaces and to limit the speed of traffic within the development to a maximum of 20mph.

Off that loop, and to the east, is located the emergency access utilising an existing road which is accessed off Marshlands. The access network is designed with a hierarchy of varying street types. These vary with character area, level of importance and area of site served breaking down to a number of small private drives.

Access of fire tenders and refuse freighters and other large vehicles throughout the site has been carefully considered and tracked with a refuse strategy in mind so drag distances are complied with.

Alternative transport modes have been carefully considered in the layout of the development and its connection with existing networks beyond the site for internal leisure and recreational use and with regard to reinforcing its sustainable location and connectivity with Dymchurch. There is an extensive path and cycleway network.

KCC Highways are completely happy with all aspects of the indicative layout including: all of the vehicle, cycle and pedestrian access arrangements; the tracking of refuse freighters, fire tenders and other large vehicles; new primary bridge access to the site; emergency access; parking provision in line with current standards including visitors; connectivity to the surroundings; proposed adoptable parts of the new access network; proposed signalised pedestrian crossing; and visibility splays.

The site is relatively flat and as such should permit dwellings to be designed compliant with Approved Document Part M complete with accessible approaches and level threshold entry



The previous proposal was not refused on highways grounds and continued support was given by KCC Highways to it through the planning consultation process. This assisted the planning officer in making a recommendation for approval to the Planning Committee.

It has been demonstrated, through the previous outline planning application ref: 21/2525/FH, that a scheme for 132 dwellings is deliverable on the site, taking all policy requirements into consideration. Therefore a proposal for less dwellings, at 125, in highways terms, should therefore be more acceptable.

This new and improved proposal, that is for less dwellings, will have a reduced impact on the existing highways network. The internal pedestrian, cycle and vehicular network is mostly unchanged and maintains policy compliant parking. We thus confirm that the previous transport report remains relevant and we have therefore resubmitted it in support of this application.

6.8

Design Assessment

Parameter Plans



HIGH KNOCKE FARM, DYMCHURCH

- Combined cycle and footpath
- Primary footpaths
- Existing footpath
- Existing primary footpaths
- Combined cycle and footpath connection point with existing
- Footpath connection point with existing
- Overall pedestrian flow direction
- Perimeter recreational route
- Primary public green space
- Existing water courses
- Approximate location of play area

PEDESTRIAN NETWORK



HIGH KNOCKE FARM, DYMCHURCH

- Existing ditch standoff area
- Character area 1
- Character area 2
- Character area 3
- Character area 4
- Character area 5
- Character area 6
- Active Frontage
- Primary public green space
- Existing water courses
- Approximate location of play area



CHARACTER AREAS

HIGH KNOCKE FARM DYMCHURCH

-  Landscape views out of the site from vehicular route
-  Green views within the site
-  Views out of site
-  Primary public green space
-  Existing water courses
-  Approximate location of play area



KEY VIEWS

HIGH KNOCKE FARM, DYMCHURCH



LANDSCAPING

Conclusion

We have established that the application site represents a logical, highly accessible southern extension to Dymchurch that is exceptionally well-related to the settlement centre and a range of day-to-day facilities and services.

We have demonstrated through the submission of the supporting Flood Risk Assessment and Sequential Test Assessment that the application site is suitable for development and is one of the least vulnerable sites in the area where new development could reasonably be located. Detailed modelling confirms that the overall risk of flooding is 'low' and the proposed development can be made safe throughout its lifetime through straight forward mitigation measures.

The proposed development comprises a landscape-led, up to 125 unit scheme with policy compliant affordable/social housing and includes the provision of significant ecological enhancements. It will be capable of providing a contribution to the supply of affordable homes and provide substantial financial contributions to further benefit Dymchurch's local community. It has been designed by the Landscape Architects to include scope for ecological improvements that could allow a future reserved matters landscape design and planning application that is capable of achieving 10% net gain biodiversity.

It will assist in providing further security to the Folkestone and Hythe District Council's 5 YHLS and represents a significant opportunity to deliver logical and sustainably located new homes for permanent residents, capable of supporting the vitality and viability of an otherwise heavily tourism-reliant settlement.

The previous application, that was refused by the committee, had been recommended by the Local Planning Authority for approval demonstrating that in their eyes it was policy compliant in all respects.

The planning committee's single reason for refusal has been responded to within this new proposal with an improved design.

For the reasons set out above and within this statement, the proposals are considered to be in accordance with the objectives of the key local and national policies and we therefore strongly believe that the application is worthy of approval.





Artists Impressions

