

[REDACTED]

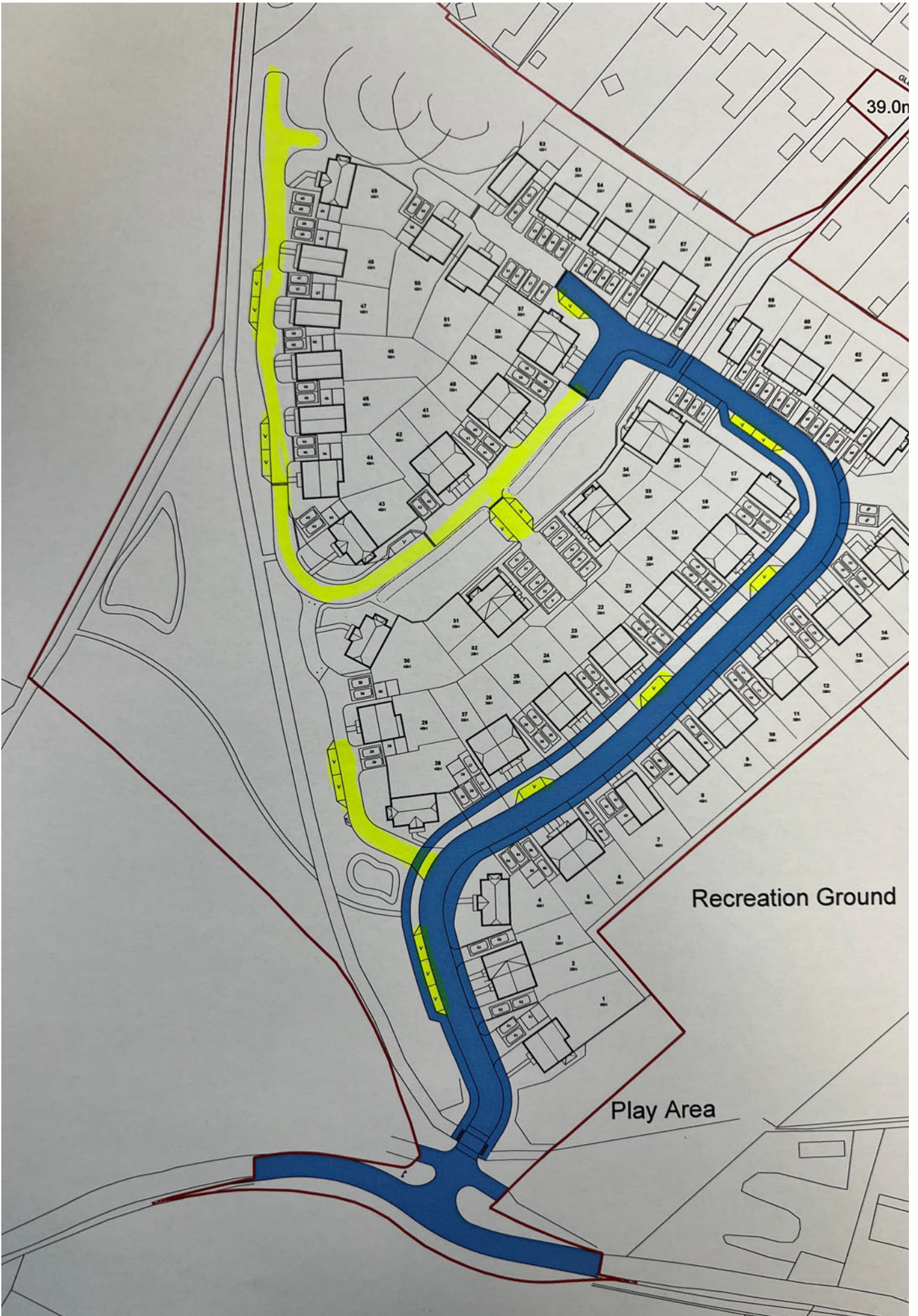
From: [REDACTED]@dhaplanning.co.uk>
Sent: 05 March 2026 15:14
To: [REDACTED]
Cc: [REDACTED]
Subject: Adoption Plan - Kingsdown

[CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe]

Hi [REDACTED]

Sorry, this is a bit rough and ready, but please see the marked-up plan below.

Before we get it changed, if we extended the areas shown for potential adoption to include the areas I have roughly highlighted yellow, would this satisfy KCC Highways?



Kind Regards

[Redacted]
Director

Office: [Redacted]
Mobile: [Redacted]
Email: [Redacted]@dhaplanning.co.uk

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[REDACTED]

From: [REDACTED]@DOVER.GOV.UK>
Sent: 05 March 2026 21:52
To: [REDACTED]
Subject: Fw: Adoption Plan - Kingsdown - DOV/25/00112
Attachments: 7353 PL08P2 Potential Adoption Plan.pdf

Hi [REDACTED]

I have received this from Kitewood.

Kind regards

[REDACTED]
Please note: I do not work Fridays.



[REDACTED]
Principal Planning Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ
Tel: [REDACTED]
Email: [REDACTED]@dover.gov.uk
Web: dover.gov.u

From: [REDACTED]@dhaplanning.co.uk>
Sent: 05 March 2026 17:27
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@kitewood.co.uk>
Subject: Adoption Plan - Kingsdown - DOV/25/00112

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Good Afternoon [REDACTED]

Further to our conversation this afternoon, does the attached now achieve what KCC Highways were after?

Kind Regards

[REDACTED]
Director

Office: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED]@dhaplanning.co.uk

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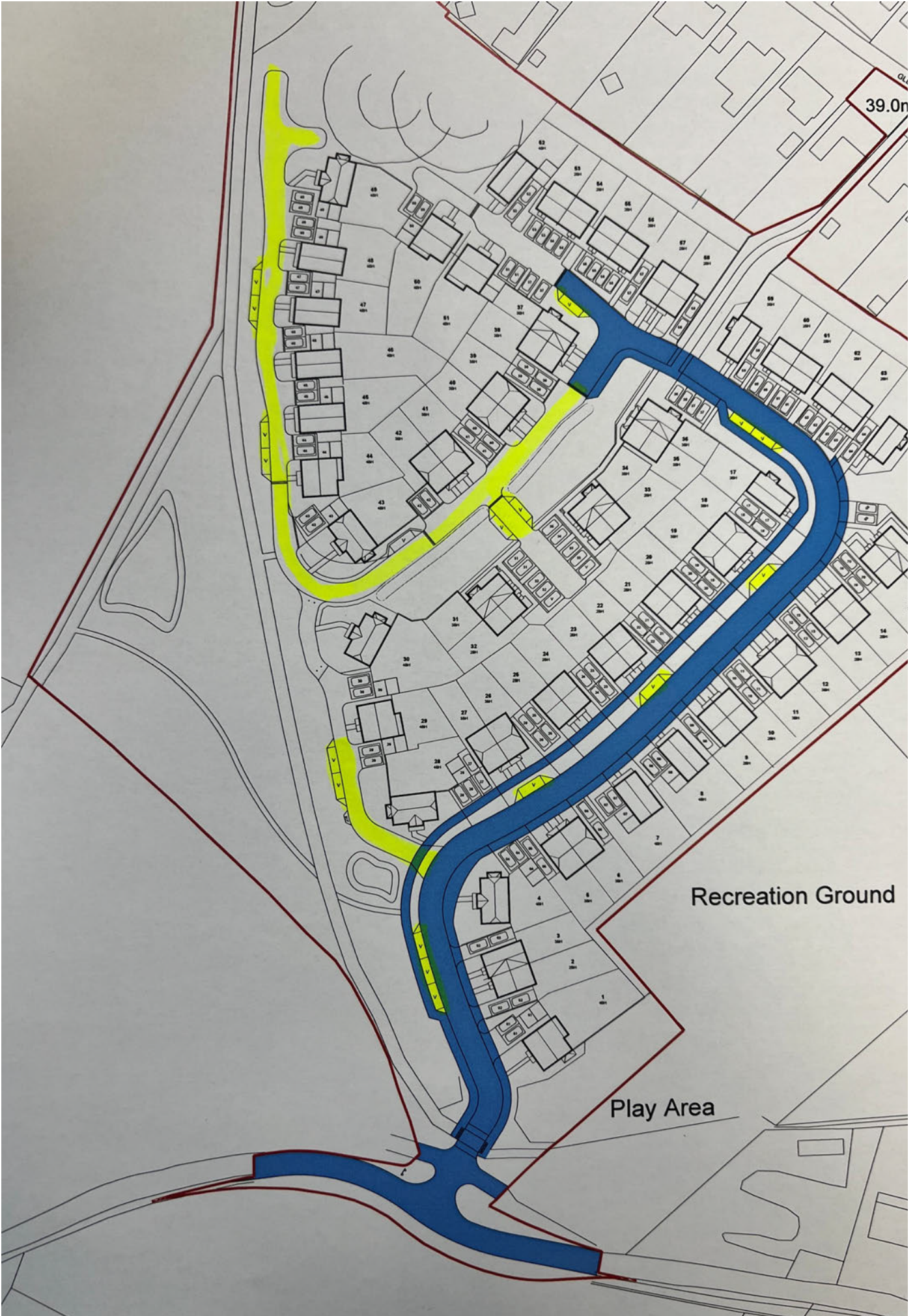
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From: [REDACTED]
Sent: 05 March 2026 15:14
To: [REDACTED]@dover.gov.uk>
Cc: [REDACTED]@kitewood.co.uk>
Subject: Adoption Plan - Kingsdown

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Kind Regards

Director

Office:
Mobile:
Email: @dhaplanning.co.uk

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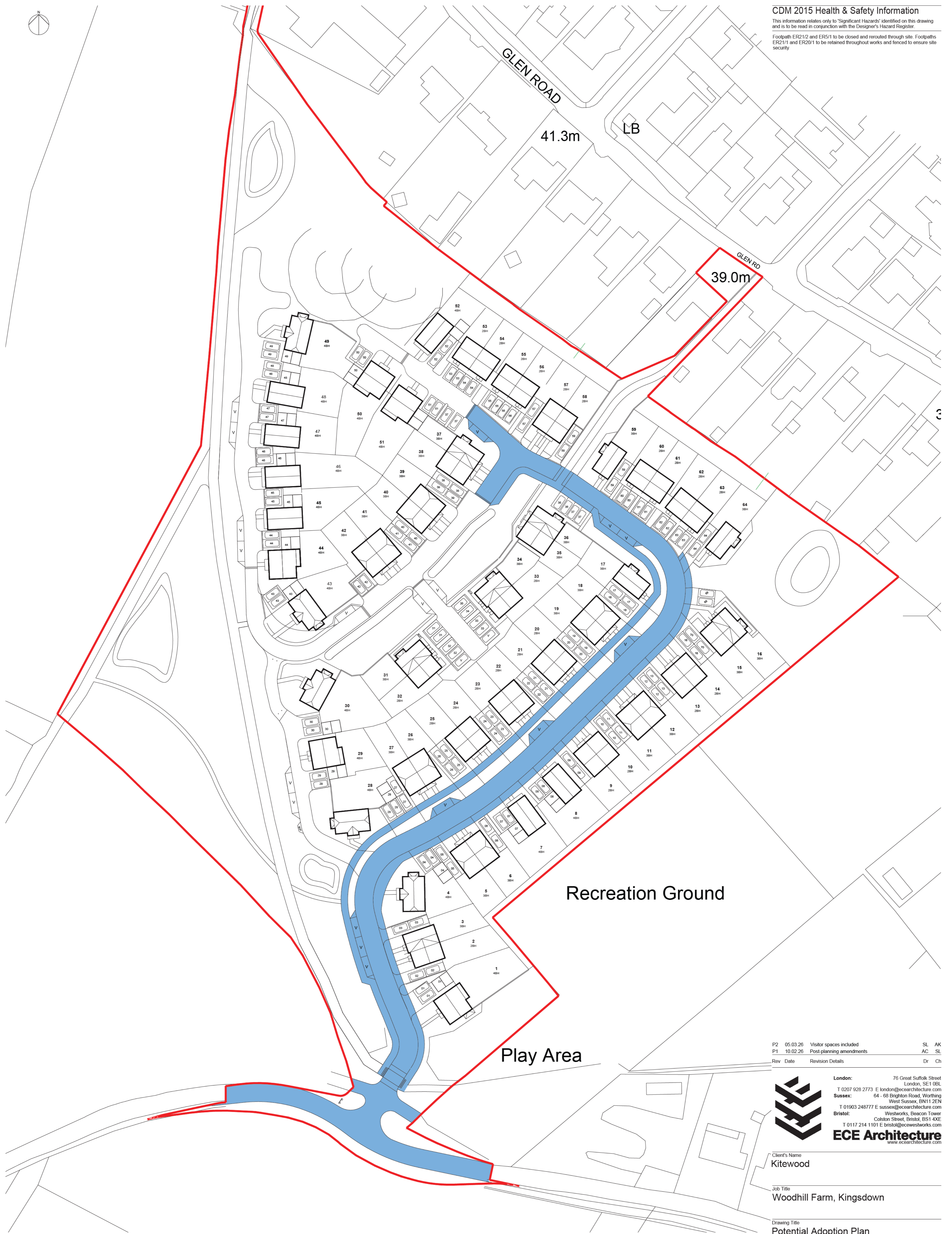
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KEY

Adopted Highway

P2	05.03.26	Visitor spaces included	SL	AK
P1	10.02.26	Post-planning amendments	AC	SL
Rev	Date	Revision Details	Dr	Ch



London: 76 Great Suffolk Street
London, SE1 0BL
T 0207 928 2773 E london@ecearchitecture.com

Sussex: 64 - 68 Brighton Road, Worthing
West Sussex, BN11 2EN
T 01903 248777 E sussex@ecearchitecture.com

Bristol: Westworks, Beacon Tower
Colston Street, Bristol, BS1 4XE
T 0117 214 1101 E bristol@eceworks.com

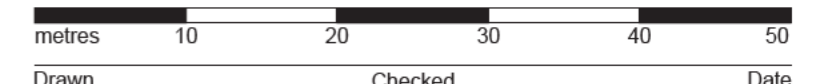
ECE Architecture
www.ecearchitecture.com

Client's Name
Kitewood

Job Title
Woodhill Farm, Kingsdown

Drawing Title
Potential Adoption Plan

Scale
1:500 @ A1 / 1:1000 @ A3



Drawn	Checked	Date
AX	SLG	20.05.25

Job No	Drawing No	Rev
7353	PL-08	P2

Status
APPROVAL

[REDACTED]

From: [REDACTED]@kent.gov.uk
Sent: 06 March 2026 15:07
To: [REDACTED]@DOVER.GOV.UK
Cc: [REDACTED]@DOVER.GOV.UK
Subject: Re: 25/00112 - Land north of Kingsdown Recreation Ground

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Hi [REDACTED]

I'm happy that the layout revisions have addressed our concerns regarding the preservation in situ of archaeology in the northern part of the site.

As previously discussed, I am content that any archaeological measures in the remaining parts of the site can be dealt with post-consent, secured by means of condition. The following covers what would be required:

AR1 *No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written specification and timetable which has been submitted to and approved by the Local Planning Authority.*

Reason: To ensure that features of archaeological interest are properly examined and recorded.

For the area where archaeology is being preserved I think we had already agreed that precise details of landscaping here could be secured by condition - is there a standard condition wording for agreement of landscaping details that you could use?

Additionally, I suggest it would be appropriate to include conditions for the future management of this area, including provision for on-site interpretation:

Heritage Management Plan:

No development shall take place until a Heritage Management Plan has been submitted to and approved in writing by the Local Planning Authority. The Heritage Management Plan will set out measures for the safeguarding and subsequent management of buried archaeology to be preserved in situ within areas of open green space.

Reason : To ensure that due regard is had to the preservation in situ of important archaeological remains.

Public benefit - heritage interpretation:

Prior to the occupation of the development hereby permitted, details of on-site interpretation to be incorporated within the development will have been submitted to and approved in writing by the Local Planning Authority. The submitted information shall include details of the location, design, dimensions and materials of proposed on-site interpretation works. The approved details shall be implemented in full prior to the first occupation of the development hereby permitted and retained and maintained thereafter.

Reason: To ensure a satisfactory visual appearance and to ensure the development makes a positive contribution to local character and distinctiveness.

I trust that the above covers everything required.

Many thanks for your assistance with this application.

█

█ | Senior Archaeological Officer | Heritage Conservation | Kent County Council | Invicta House, County Hall, Maidstone ME14 1XX | Telephone: █ | www.kent.gov.uk |

Please help save paper by NOT printing this email unless absolutely necessary.

From: █ DOVER.GOV.UK>
Sent: 06 March 2026 10:14
To: █@kent.gov.uk>
Cc: █@DOVER.GOV.UK>
Subject: 25/00112 - Land north of Kingsdown Recreation Ground

Dear █

I am in the process of writing up this planning application for Marchs committee, the deadline for reports is Monday. Are you able to provide me with your comments please?

Kind regards

█

Please note: I do not work Fridays.



█
Principal Planning Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ
Tel: █
Email: █@dover.gov.uk
Web: dover.gov.uk

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From: [REDACTED]@dhaplanning.co.uk>
Sent: 10 March 2026 08:40
To: [REDACTED]
Subject: Adopted road plan
Attachments: 7353 PL08P3 Potential Adoption Plan.pdf

[CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe]

Morning

Please see the attached.

Kind Regards

[REDACTED]
Director

Office: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED]@dhaplanning.co.uk

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From: [REDACTED]
Sent: 09 March 2026 13:49
To: [REDACTED]@DOVER.GOV.UK>
Subject: RE: Adopted road plan

Hi

I am chasing the architects, the usual contact is on leave.

However, I have asked for the area outline in black to be added to the adoption area.



Kind Regards

[Redacted]
Director

Office: **[Redacted]**
Mobile: **[Redacted]**
Email: **[Redacted]** [@dhaplanning.co.uk](mailto:[Redacted]@dhaplanning.co.uk)

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From: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Sent: 09 March 2026 13:43
To: [REDACTED] [@dhaplanning.co.uk](mailto:[REDACTED]@dhaplanning.co.uk)>
Subject: Adopted road plan

[External email - This message originated from outside DHA – prior to opening any attachments or opening links, please ensure their authenticity with the sender]

Hi [REDACTED]

Are you able to provide the adopted road plan please?

Kind regards

[REDACTED]

Please note: I do not work Fridays.



[REDACTED]
Principal Planning Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ
Tel: [REDACTED]
Email: [REDACTED] [@dover.gov.uk](mailto:[REDACTED]@dover.gov.uk)
Web: dover.gov.u

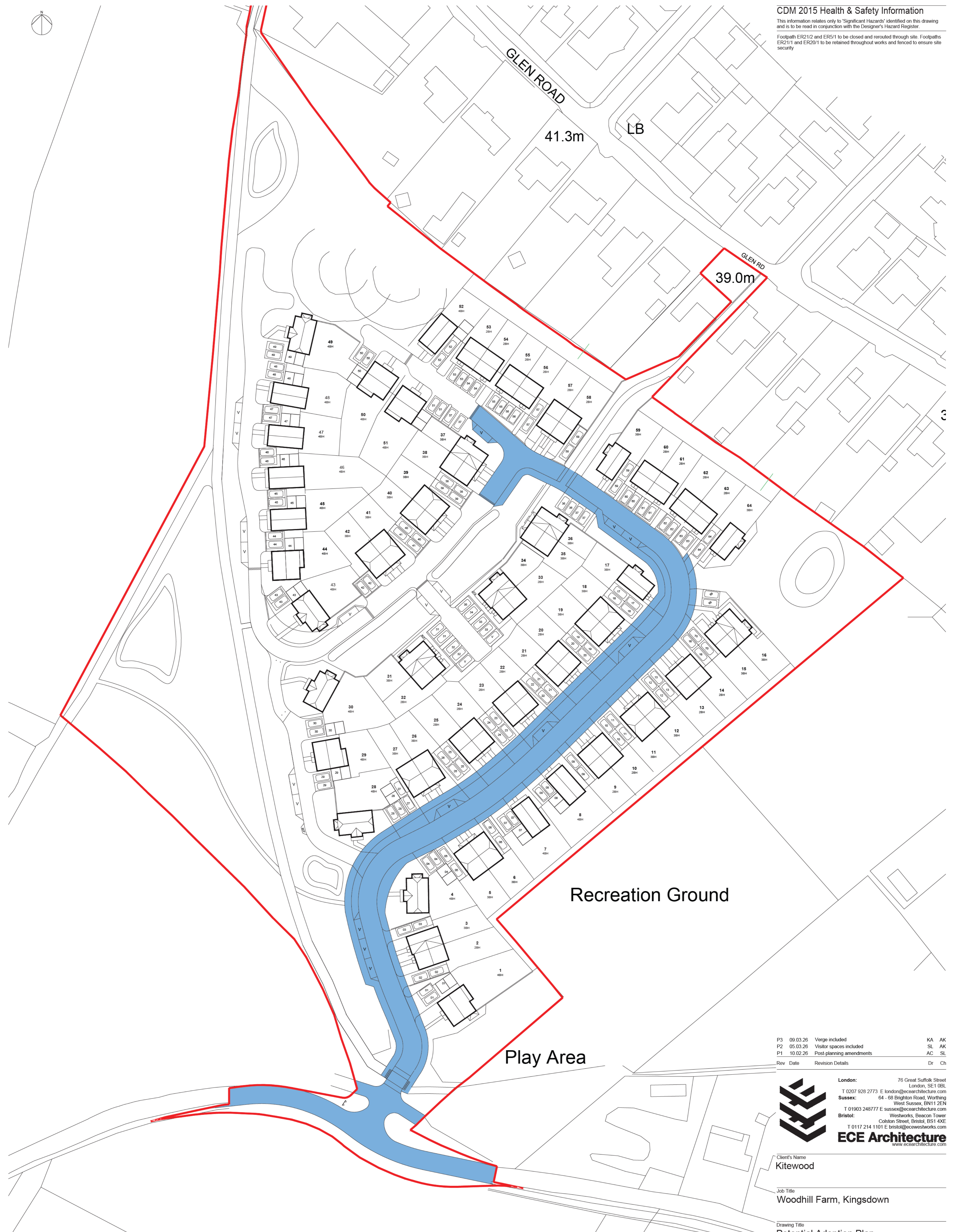
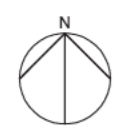
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P3	09.03.26	Verge included	KA	AK
P2	05.03.26	Visitor spaces included	SL	AK
P1	10.02.26	Post-planning amendments	AC	SL
Rev	Date	Revision Details	Dr	Ch

ECE Architecture
www.ecearchitecture.com
London: 76 Great Suffolk Street, London, SE1 0BL
T 0207 928 2773 E london@ecearchitecture.com
Sussex: 64 - 68 Brighton Road, Worthing, West Sussex, BN11 2EN
T 01903 248777 E sussex@ecearchitecture.com
Bristol: Westworks, Beacon Tower, Colston Street, Bristol, BS1 4XE
T 0117 214 1101 E bristol@eceworks.com

Client's Name
Kitewood

Job Title
Woodhill Farm, Kingsdown

Drawing Title
Potential Adoption Plan

Scale
1:500 @ A1 / 1:1000 @ A3



Drawn	Checked	Date
AX	SLG	20.05.25

Job No	Drawing No	Rev
7353	PL-08	P3

Status
APPROVAL

KEY
Adopted Highway

From: [REDACTED]@DOVER.GOV.UK>
Sent: 10 March 2026 09:13
To: [REDACTED]
Subject: Fw: Adopted road plan
Attachments: 7353 PL08P3 Potential Adoption Plan.pdf

Morning [REDACTED]

I have received the adopted plan.

Kind regards

[REDACTED]
Please note: I do not work Fridays.



[REDACTED]
Principal Planning Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ
Tel: [REDACTED]
Email: [REDACTED]@dover.gov.uk
Web: dover.gov.u

From: [REDACTED]@dhaplanning.co.uk>
Sent: 10 March 2026 08:40
To: [REDACTED]@DOVER.GOV.UK>
Subject: Adopted road plan

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Morning

Please see the attached.

Kind Regards

[REDACTED]
Director

Office: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED]@dhaplanning.co.uk

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Office: [Redacted]
Mobile: [Redacted]
Email: [Redacted]@dhaplanning.co.uk

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Subject: Adopted road plan

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Hi [REDACTED]

Are you able to provide the adopted road plan please?

Kind regards

[REDACTED]

Please note: I do not work Fridays.



[REDACTED]
Principal Planning Officer

Dover District Council

Council Offices, White Cliffs Business Park, Whitfield,

Dover CT16 3PJ

Tel: [REDACTED]

Email: [REDACTED] <[\[REDACTED\]@dover.gov.uk](mailto:[REDACTED]@dover.gov.uk)>

Web: dover.gov.uk

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Rev	Date	Revision Details	Dr	Ch

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Colston Street, Bristol, BS1 4XE
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ECE Architecture
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Client's Name
Kitewood

Job Title
Woodhill Farm, Kingsdown

Drawing Title
Potential Adoption Plan

Scale
1:500 @ A1 / 1:1000 @ A3



Drawn	Checked	Date
AX	SLG	20.05.25

Job No	Drawing No	Rev
7353	PL-08	P3

Status
APPROVAL

KEY
Adopted Highway

[REDACTED]

From: [REDACTED]
Sent: 11 March 2026 12:02
To: FET@kent.fire-uk.org
Subject: DOV/25/00112 - Land north of west of Kingsdown Recreation ground, ringwould road, Kingsdown

Good Afternoon,

I am writing with reference to the above planning application for 64 dwellings on the site. Within your recent comments you have set out ' However, where this application is for 70-dwellings, under the Kent Design Guide there is guidance for a secondary emergency access point in the form of a pedestrianised footpath, or cycle lane in developments in excess of 50 dwellings, therefore this should be taken into consideration due to exceeding this figure'.

The applicant is proposing a secondary access which is pedestrian only, to provide this a garage of an existing property is to be removed, this of course provides limitation for providing this access for fire appliances. Would this be sufficient to warrant a reason for a refusal?

Kind regards

[REDACTED]
Please note: I do not work Fridays.



[REDACTED]
Principal Planning Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ
Tel: [REDACTED]
Email: [REDACTED]@dover.gov.uk
Web: dover.gov.uk

[REDACTED]

From: [REDACTED]
Sent: 11 March 2026 15:29
To: Fire Engineering Team
Subject: Fw: DOV/25/00012 - Land north west of Kingsdown Recreation ground

Good afternoon,

Further to my previous email, please see the response from the applicant.

Kind regards

[REDACTED]
Please note: I do not work Fridays.



[REDACTED]
Principal Planning Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ
Tel: [REDACTED]
Email: [REDACTED]@dover.gov.uk
Web: dover.gov.uk

From: [REDACTED]
Sent: 11 March 2026 14:31
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: DOV/25/00012 - Land north west of Kingsdown Recreation ground
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Afternoon [REDACTED]

Further to the below, we note that the response cross references the Kent Design Guide which suggests a 50 unit threshold, although this is assessed on a site-by-site basis. The proposals offer a split access route for fire tenders as soon as possible after entry to the site (at the 2nd bend, where vehicles will have only passed four dwellings, there is a fire access route controlled by bollards which provides an alternative route around the site for emergency vehicles only). In addition to this, for the short section of road before the road splits, fire and rescue vehicles can mount/drive along the pavement to avoid any obstructions with a total width of 9.5m available in this section (i.e. there is no tree planting that could preclude this, and this can be confirmed through the submission of landscape details which are to be conditioned). In addition, Kent County Council are content with the suggested areas of adoption, including the carriageway and can introduce the necessary parking controls (i.e. double yellow lines) as required. This is a common emergency access solution. The proposals were subject to pre-application discussions with KCC Highways, which have also commented on the application raising no objection in respect of emergency vehicle access. This

matter is also comprehensively addressed in the submitted Transport Assessment (TA) accompanying the application, see Section 4.6.

If you need any further information, then please do let me know.

Kind Regards

[Redacted]

Director

Office: [Redacted]

Mobile: [Redacted]

Email: [Redacted]@dhaplanning.co.uk

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From: [Redacted]@DOVER.GOV.UK>

Sent: 11 March 2026 12:09

To: [Redacted]@dhaplanning.co.uk>

Cc: [Redacted]@DOVER.GOV.UK>

Subject: DOV/25/00012 - Land north west of Kingsdown Recreation ground

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Morning [Redacted]

I am finalising the committee report and have come across comments from Kent Fire and Rescue setting out ' However, where this application is for 70-dwellings, under the Kent Design Guide there is guidance for a secondary emergency access point in the form of a pedestrianised footpath, or cycle lane in developments in excess of 50 dwellings, therefore this should be taken into consideration due to exceeding this figure'. I appreciate you have provided a secondary pedestrian access but this does not appear wide enough for access for a fire appliance to be able to access.

This is a query raised by a local Cllr and I have had to ask Kent Fire and Rescue for there stance. Have you got any additional information you are able to provide?

Kind regards,

[REDACTED]

Kind regards

Karen

Please note: I do not work Fridays.



[REDACTED]
Principal Planning Officer

Dover District Council

Council Offices, White Cliffs Business Park, Whitfield,

Dover CT16 3PJ

Tel: [REDACTED]

Email: [REDACTED]@[dover.gov.uk](mailto: [REDACTED]@dover.gov.uk)

Web: dover.gov.u

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From: [REDACTED]@dhaplanning.co.uk>
Sent: 12 March 2026 09:47
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: DOV/25/00012 - Land north west of Kingsdown Recreation ground

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If you need anything from us, just let us know.

Many thanks

Kind Regards

[REDACTED]
Director

Office: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED]@dhaplanning.co.uk

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From: [REDACTED]@DOVER.GOV.UK>
Sent: 12 March 2026 09:46
To: [REDACTED]@dhaplanning.co.uk>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: Re: DOV/25/00012 - Land north west of Kingsdown Recreation ground

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Morning [REDACTED]

I have gone back to KCC public rights of way team this morning, addressing these issues.

Kind regards

[REDACTED]

Please note: I do not work Fridays.



[REDACTED]
Principal Planning Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ
Tel: [REDACTED]
Email: [REDACTED]@dover.gov.uk
Web: dover.gov.uk

From: [REDACTED]@dhaplanning.co.uk>
Sent: 11 March 2026 21:49
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: RE: DOV/25/00012 - Land north west of Kingsdown Recreation ground

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Hi [REDACTED]

I have also noticed the refreshed comments from the PROW Team. Main point below.

Not sure if you are discussing this with them, but they seem to keep overlooking the fact ER5 is not the primary access and have just cut and pasted part of the policy, misrepresenting what is said in the Planning Statement.

From a public right of way stance I have no objection to the development itself; however, I have concerns regarding the access and supported upgrade of the public rights of way. The amended planning statement as written states:

“For PROW ER5 to be a primary pedestrian access it must be upgraded to a minimum of 2m in width with overlooking from the highway.”

I note the second point also (copied below), raising concerns over the safety of pedestrians and equestrian users where the entrance passes over routes ER5 and ER21.

KCC Highways has raised no concerns with this arrangement in its consultation response. A Stage 1 Highway Safety Audit also accompanied the application (which KCC Highways has reviewed) and this also does not raise any issues.

Indeed, the proposals improve the current arrangement, where there is no controlled crossing for the access serving the parking area for the adjacent play area. We further note the request for a raised table, which is shown on the proposed access drawing. This and the access, including footways are proposed for adoption by KCC and would therefore also be under County Council control.

The entrance access to the site will be directly over Public Footpath ER5 and Public Bridleway ER21, I have concerns about the safety for both pedestrian and equestrian user
The application states:

“Due to the rural and narrow nature of the existing access, an improved layout is proposed that reconfigures the junction to accommodate an appropriate means of access/egress and provides adequate visibility.”

In addition to the Highways approved realignment there should be a suitable table crossing to accommodate both pedestrian and equestrian which complies with the Kent Design guide, and improved sight lines.

There is also reference to contribution towards street lighting, public rights of way are not able to provide street lighting the applicant would need to consult with Highways to incorporate any lighting, on this point I think with the limited room it would not be achievable. Overall, the utilisation of ER5 as a main route has not been considered very well.

Kind Regards

[Redacted]
Director

Office: [Redacted]
Mobile: [Redacted]
Email: [Redacted]@dhaplanning.co.uk

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From: [REDACTED]
Sent: 11 March 2026 14:31
To: [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Cc: [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Subject: RE: DOV/25/00012 - Land north west of Kingsdown Recreation ground

Afternoon [REDACTED]

Further to the below, we note that the response cross references the Kent Design Guide which suggests a 50 unit threshold, although this is assessed on a site-by-site basis.

The proposals offer a split access route for fire tenders as soon as possible after entry to the site (at the 2nd bend, where vehicles will have only passed four dwellings, there is a fire access route controlled by bollards which provides an alternative route around the site for emergency vehicles only).

In addition to this, for the short section of road before the road splits, fire and rescue vehicles can mount/drive along the pavement to avoid any obstructions with a total width of 9.5m available in this section (i.e. there is no tree planting that could preclude this, and this can be confirmed through the submission of landscape details which are to be conditioned). In addition, Kent County Council are content with the suggested areas of adoption, including the carriageway and can introduce the necessary parking controls (i.e. double yellow lines) as required. This is a common emergency access solution.

The proposals were subject to pre-application discussions with KCC Highways, which have also commented on the application raising no objection in respect of emergency vehicle access. This matter is also comprehensively addressed in the submitted Transport Assessment (TA) accompanying the application, see Section 4.6.

If you need any further information, then please do let me know.

Kind Regards

[REDACTED]
Director

Office: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED] <[\[REDACTED\]@dhaplanning.co.uk](mailto:[REDACTED]@dhaplanning.co.uk)>

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From: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Sent: 11 March 2026 12:09
To: [REDACTED] [@dhaplanning.co.uk](mailto:[REDACTED]@dhaplanning.co.uk)>
Cc: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Subject: DOV/25/00012 - Land north west of Kingsdown Recreation ground

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Morning [REDACTED]

I am finalising the committee report and have come across comments from Kent Fire and Rescue setting out ' However, where this application is for 70-dwellings, under the Kent Design Guide there is guidance for a secondary emergency access point in the form of a pedestrianised footpath, or cycle lane in developments in excess of 50 dwellings, therefore this should be taken into consideration due to exceeding this figure'.

I appreciate you have provided a secondary pedestrian access but this does not appear wide enough for access for a fire appliance to be able to access.

This is a query raised by a local Cllr and I have had to ask Kent Fire and Rescue for there stance. Have you got any additional information you are able to provide?

Kind regards,

[REDACTED]

Kind regards

[REDACTED]

Please note: I do not work Fridays.



[REDACTED]
Principal Planning Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ
Tel: 01304 872463
Email: karen.evans@dover.gov.uk
Web: dover.gov.u

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From: [REDACTED]
Sent: 12 March 2026 19:44
To: Cllr-[REDACTED]
Subject: Re: 25/00112 - fire,

Dear Cllr,

I have been looking into this further for you and have discussed this with Kent Highway Services.

In respect of a fire engine, the pedestrian access does not look wide enough for a fire engine to enter/exit the site. However, the proposals offer a split access route for fire tenders as soon as possible after entry to the site (at the 2nd bend, where vehicles will have only passed four dwellings, there is a fire access route controlled by bollards which provides an alternative route around the site for emergency vehicles only). Kent Highway Services are satisfied with this approach and will be adopting the road at this point.

I hope this is of assistance, I will be back in the office next week if you wish to discuss this point.

Kind regards

[REDACTED]
Please note: I do not work Fridays.



[REDACTED]
Principal Planning Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ
Tel: [REDACTED]
Email: [REDACTED]@dover.gov.uk
Web: dover.gov.uk

From: [REDACTED]
Sent: 16 February 2026 12:26
To: Cllr-[REDACTED]
Subject: Re: 25/00112 - fire,
Good Morning,

Here is the information provided by Kent Fire and Rescue. There is a reduction in the amount of development, but the following needs to be considered;

Upon reviewing the available plans on the Dover planning portal, I acknowledge the pumping appliance plan demonstrating a swept path analysis (drawing: ITL19167-GA-010, Rev F), which appears satisfactory. However, where this application is for 70-dwellings, under the Kent Design Guide there is guidance for a secondary emergency access point in the form of a pedestrianised footpath, or cycle lane in developments in excess of 50 dwellings, therefore this should be taken into consideration due to exceeding this figure.

Kind regards

[REDACTED]

Please note: I do not work Fridays.
Upcoming leave: 17th -23rd February 2026



[REDACTED]

Principal Planning Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ
Tel: [REDACTED]
Email: [REDACTED]@dover.gov.uk
Web: dover.gov.u

From: Cllr- [REDACTED]
Sent: 16 February 2026 09:43
To: [REDACTED]
Subject: 25/00112 - fire,

Just double checked about fire. Presumably the lane going from the development between Winstead house and Little Bassett house onto Glen rd is wide enough for a fire engine?

[REDACTED]

Cllr [REDACTED]
Mill Hill ward
Deal

[REDACTED]

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[REDACTED]

From: [REDACTED]
Sent: 18 March 2026 10:07
To: [REDACTED]
Subject: Fw: 25/00112 - NE Response - kingsdown
Attachments: Kingsdown HRA Feb26.docx; Annex A - Oct 2025.pdf

Morning [REDACTED]

Do I have time to change the report?

Kind regards

[REDACTED]
Please note: I do not work Fridays.



[REDACTED]
Principal Planning Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ
Tel: [REDACTED]
Email: [REDACTED]
Web: dover.gov.u

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 18 March 2026 10:03
To: [REDACTED]
Subject: 25/00112 - NE Response

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Our ref: **543288**
Your ref: **25/00112**

Dear [REDACTED],

Planning consultation: Full planning application for the erection of 64 dwellings including access, parking, landscaping, and associated infrastructure

Location: Land North West Of Kingsdown Recreation Ground Ringwould Road Kingsdown

Thank you for your consultation on the above dated 2 March 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Further information on when to consult Natural England on planning proposals is here- [Planning and transport authorities: get environmental advice on planning - GOV.UK \(www.gov.uk\)](#)

Natural England is not able to provide specific advice on this application and therefore has no comment to make on its details. Although we have not been able to assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes, we offer the further advice and references to Standing Advice.

Natural England advises Local Planning Authorities to use the following tools to assess the impacts of the proposal on the natural environment:

Impact Risk Zones:

Natural England has provided Local Planning Authorities (LPAs) with Impact Risk Zones (IRZs) which can be used to determine whether the proposal impacts statutory nature conservation sites. Natural England recommends that the LPA uses these IRZs to assess potential impacts. If proposals do not trigger an Impact Risk Zone then Natural England will provide an auto-response email.

Standing Advice:

Natural England has published Standing Advice. Links to standing advice are in Annex A

If after using these tools, you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require Natural England's advice.

Further information on LPA duties relating to protected sites and areas is here- [Protected sites and areas: how to review planning applications - GOV.UK \(www.gov.uk\)](#)

Further guidance is also set out in Planning Practice Guidance on the natural environment [Natural environment - GOV.UK \(www.gov.uk\)](#) and on Habitats Regulations Assessment [Appropriate assessment - GOV.UK \(www.gov.uk\)](#)

Non detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the local planning authority to determine whether or not the proposal is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the environmental value of this site and the impacts of the proposal on the natural environment to assist the decision making process.

Should the proposal change, please consult us again.

Yours sincerely,


Officer
Natural England
Consultation Service
Natural England, County Hall, Spetchley Road, Worcester, U.K., WR5 2NP
Email: consultations@naturalengland.org.uk
www.gov.uk/natural-england

We strongly recommend using the SSSI Impact Risk Zones (SSSI IRZs) to decide when to consult Natural England on development proposals that might affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

From: [REDACTED]
Sent: 02 March 2026 16:27
To: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Subject: Re: 541171 25_00112 NE Response

You don't often get email from [REDACTED]. [Learn why this is important](#)

Good afternoon,

Please find attached the revised HRA.

Kind regards

[REDACTED]
Please note: I do not work Fridays.



[REDACTED]
Principal Planning Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ
Tel: [REDACTED]
Email: [REDACTED]
Web: dover.gov.uk

From: SM-NE-Consultations (NE)
Sent: 24 February 2026 08:46
To: [REDACTED]
Subject: 541171 25_00112 NE Response

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Our ref: 541171

Your ref: DOV/25/00112

Dear [REDACTED]

Planning consultation: Erection of 70 dwellings including access, parking, landscaping, and associated infrastructure

Location: Land North West Of Kingsdown Recreation Ground Ringwould Road, Kingsdown

Thank you for your consultation on the above dated 11 February 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Further information on when to consult Natural England on planning proposals is here- [Planning and transport authorities: get environmental advice on planning - GOV.UK \(www.gov.uk\)](#)

Natural England is not able to provide specific advice on this application and therefore has no comment to make on its details. Although we have not been able to assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes, we offer the further advice and references to Standing Advice.

Natural England advises Local Planning Authorities to use the following tools to assess the impacts of the proposal on the natural environment:

Impact Risk Zones:

Natural England has provided Local Planning Authorities (LPAs) with Impact Risk Zones (IRZs) which can be used to determine whether the proposal impacts statutory nature conservation sites. Natural England recommends that the LPA uses these IRZs to assess potential impacts. If proposals do not trigger an Impact Risk Zone then Natural England will provide an auto-response email.

Standing Advice:

Natural England has published Standing Advice. Links to standing advice are in Annex A

If after using these tools, you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require Natural England's advice.

Further information on LPA duties relating to protected sites and areas is here- [Protected sites and areas: how to review planning applications - GOV.UK \(www.gov.uk\)](#)

Further guidance is also set out in Planning Practice Guidance on the natural environment [Natural environment - GOV.UK \(www.gov.uk\)](#) and on Habitats Regulations Assessment [Appropriate assessment - GOV.UK \(www.gov.uk\)](#)

Non detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the local planning authority to determine whether or not the proposal is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the environmental value of this site and the impacts of the proposal on the natural environment to assist the decision making process.

Should the proposal change, please consult us again.

Yours sincerely

[REDACTED]
Officer

Natural England

Consultation Service

Natural England, County Hall, Spetchley Road, Worcester, U.K., WR5 2NP

Email: consultations@naturalengland.org.uk

www.gov.uk/natural-england

We strongly recommend using the [SSSI Impact Risk Zones](#) (SSSI IRZs) to decide when to consult Natural England on development proposals that might affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

From: [REDACTED]
Sent: 11 February 2026 09:28
To: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Subject: Re: 535089 25_00112 NE Response

You don't often get email from [REDACTED]. [Learn why this is important](#)

Good morning,
Please find attached the HRA for planning application DOV/25/00112.

Kind regards

[REDACTED]
Please note: I do not work Fridays.
Upcoming leave: 17th -23rd February 2026



[REDACTED]
Principal Planning Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ
Tel: [REDACTED]
Email: [REDACTED]
Web: dover.gov.u

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 15 December 2025 13:57
To: [REDACTED]
Subject: 535089 25_00112 NE Response

[CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe]

Planning Ref: 25/00112
Our Ref: 535089
Dear [REDACTED]

Please find Natural England's response in relation to the above mentioned consultation attached herewith.

Kind regards,

[REDACTED]
Officer
Consultations Team
Natural England
County Hall
Spetchley Road
Worcester WR5 2NP
Tel 0300 060 3900

Email: consultations@naturalengland.org.uk

www.gov.uk/natural-england



We strongly recommend using the [SSSI Impact Risk Zones](#) (SSSI IRZs) to decide when to consult Natural England on development proposals that might affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

From: [REDACTED]

Sent: 27 November 2025 13:30

To: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>

Subject: DOV/25/00112 - Land North West of Kingsdown Recreation Ground, Ringwold Road, Kingsdown

You don't often get email from [REDACTED]. [Learn why this is important](#)

Good Afternoon,

Please find attached the HRA for the above site.

Kind regards



[REDACTED]
Principal Planning Officer

Dover District Council

Council Offices, White Cliffs Business Park, Whitfield,

Dover CT16 3PJ

Tel: [REDACTED]

Email: [REDACTED]

Web: dover.gov.uk

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Dover District Council

Habitats Regulations Assessment

Record of Appropriate Assessment (Under Regulation 63 of The Conservation of Habitats and Species Regulations 2017, as amended)

DOV/25/0112 Land North West Of Kingsdown Recreation Ground, Ringwould Road, Kingsdown

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1. Introduction to Habitats Regulations Assessment

Regulation 63 of the Conservation of Habitats and Species Regulations (2017, as amended) ('the Habitats Regulations') requires an assessment where a plan or project may give rise to significant effects upon any European site (also known as the national site network). This includes Special Areas of Conservation (SACs) designated for their internationally important habitats and species and Special Protection Areas (SPAs), designated for rare, vulnerable and regularly occurring migratory bird species and internationally important wetlands.

As a matter of national planning policy, the government has chosen to apply the assessment procedures to Ramsar sites, designated for their wetlands of international importance.

This document is a record of Habitats Regulations Assessment under the Habitats Regulations considering the implications for the European sites and wetlands of international importance (together referred to as 'international sites' in this document) in view of the development proposed and in the context of the designated conservation objectives.

The assessment has been undertaken by Dover District Council and is informed by the information provided by the applicant as part of the planning application (DOV/25/0112 Land North West Of Kingsdown Recreation Ground, Ringwould Road, Kingsdown).

In accordance with the Habitats Regulations, Dover District Council, as a 'competent authority' under the Habitats Regulations, must be satisfied that the project will not cause an adverse effect on the integrity of any international site before it can grant permission for the works.

The European Commission's *Methodological guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC* remains as post-Brexit UK guidance. A four-stage approach in carrying out a Habitats Regulations Assessment is recommended in the guidance as follows.

Stage 1 Screening

Determines whether a plan or project, either alone or in combination with other plans or projects, is likely to have a significant effect upon any international site.

If the screening process identifies effects to be significant, potentially significant or uncertain, or if the screening process becomes overly complicated, then the process must proceed to Stage 2. The process should apply the precautionary principle to ascertain if significant effects are likely.

Stage 2 Appropriate Assessment

Considers the impact on the integrity of the international sites of the project alone or in combination with other plans or projects with respect to the site's structure

and function and its conservation objectives. Additionally, where there are adverse impacts, it assesses the potential mitigation for those impacts.

Stage 3 Assessment of Alternative Solutions

Examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the international sites.

Stage 4 Assessment where no Alternative Solutions Exist and where Adverse Impacts Remain

Assess compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the plan or project should proceed.

Each stage determines whether the next stage in the process is required, e.g. if it is concluded that at the end of Stage 1 there will be no likely significant effects on the international sites, there is no requirement to proceed to Stage 2.

2. Project

Application reference:	DOV/25/00112
Application location:	Land North West Of Kingsdown Recreation Ground Ringwould Road, Kingsdown.
Application description:	Erection of 70 dwellings including access, parking, landscaping, and associated infrastructure
Applicant:	Kitewood Estates Limited
HRA date:	10 th February 2026
Adoption date:	XX (as planning permission, if granted)

3. Summary of the conclusion of the assessment

The proposal has been considered in light of the assessment requirements of regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) by Dover District Council which is the competent authority responsible for authorising the project and for any assessment of it required by the Regulations.

Having carried out a ‘screening’ assessment of the project, Dover District Council has concluded that the project would be likely to have a significant effect on Thanet Coast & Sandwich Bay SPA / Ramsar site. Consequently, an appropriate assessment was required of the implications of the project on the qualifying features of those sites in light of their conservation objectives.

Following an appropriate assessment in accordance with the Regulations, the competent authority has ascertained that the project would not have an adverse effect on the integrity of Thanet Coast & Sandwich Bay SPA / Ramsar site either alone or in combination with other plans or projects.

Natural England was consulted on the appropriate assessment and the competent authority's conclusions and has **agreed / disagreed** with it **(Attach written response as Appendix).**

4. Information used for the assessment

The following sites are scoped into the assessment based on proximity to the development zone (the likely zone of influence), the consideration of pathways and receptors for possible impacts of the development and the prediction of likely significant effects:

- Dover to Kingsdown Cliffs SAC
- Thanet Coast and Sandwich Bay SPA
- Thanet Coast and Sandwich Bay Ramsar

A summary of the information gathered for the assessment is presented in the Table 1 below.

Table 1. Qualifying features of the international sites that could potentially be affected by the project

European site	Qualifying features
Dover To Kingsdown Cliffs SAC	The SAC is designated on the basis of supporting the Annex I habitats: <ul style="list-style-type: none"> • Vegetated sea cliffs of the Atlantic and Baltic Coasts. • Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites); Dry grasslands and scrublands on chalk or limestone (important orchid sites)
Thanet Coast & Sandwich Bay SPA	The SPA qualifies under Article 4.1 of the EC Birds Directive by supporting a nationally important breeding population of the following species: <ul style="list-style-type: none"> • Little tern <i>Sterna albifrons</i>
	The SPA qualifies under Article 4.1 of the EC Birds Directive by supporting a nationally important wintering population of the following species: <ul style="list-style-type: none"> • Golden plover <i>Pluvialis apricaria</i>
	The SPA qualifies under Article 4.2 by regularly supporting an internationally important wintering population of the following species: <ul style="list-style-type: none"> • Turnstone <i>Arenaria Interpres</i>
	The site also supports nationally important wintering populations of <ul style="list-style-type: none"> • Ringed plover <i>Charandrius hiaticula</i> • Grey plover <i>Pluvialis squatarola</i> • Sanderling <i>Calidris alba</i> • Lapland bunting <i>Calcarius lapponicus</i>

Thanet Coast & Sandwich Bay Ramsar	Thanet Coast & Sandwich Bay Ramsar site qualifies by supporting 15 British Red Data Book wetland invertebrates (Ramsar criterion 2) and a population of turnstone occurring at levels of international importance (Ramsar criterion 6).
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5. Screening for likely significant effects

The screening schedule assesses each aspect of the project, including construction and operational phases, when considered alone or in combination with other known plans & projects, against each qualifying feature of the international sites, in light of their conservation objectives, and draws conclusions about likely significant effects.

In reaching the conclusions of the screening assessment, Dover District Council took no account of any measures intended to avoid or reduce the potentially harmful effects on any international site.

Table 2: Dover To Kingsdown Cliffs SAC: Schedule for screening effects of the project

Dover To Kingsdown Cliffs SAC	
SAC conservation objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats • The structure and function (including typical species) of qualifying natural habitats; and • The supporting processes on which qualifying natural habitats rely
Site pressures	Site pressures include: <ul style="list-style-type: none"> • Inappropriate scrub control • Under-grazing • Recreational pressure • Air quality
Site condition	The most recent condition assessments for the Site of Special Scientific Interest (SSSI) which underpins the European designation states the majority of units are in favourable condition. Of the 23 units, 4 are assessed as Unfavourable – Recovering and 3 are Unfavourable – No change, with one of these highlighting erosion of chalk grassland as a result of multiplication and increase in path widths as a major concern. All of the SSSI units within 2.5km of the application site are in favourable condition.

Qualifying feature	Possible effect of the project	
	Construction	Operation
Vegetated sea cliffs of the Atlantic and Baltic Coasts.	Potential for construction traffic to increase air pollution that affects SAC habitats	Potential for increase in traffic as a result of new residents to lead to increase in air pollution that affects SAC habitats
Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites)	Potential for construction traffic to increase air pollution that affects SAC habitats	<ol style="list-style-type: none"> 1. Potential for increase in traffic as a result of new residents to lead to increase in air pollution that affects SAC habitats 2. Potential for increase in recreational activity leading to impacts to SAC habitats
Conclusions		
Vegetated sea cliffs of the Atlantic and Baltic Coasts.	No likely significant effect due to location of and distance to qualifying feature and lack of impact pathway.	No likely significant effect due to location of and distance to qualifying feature and lack of impact pathway.
Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites)	No likely significant effect due to scale and duration of construction and likely routes of construction traffic.	<ol style="list-style-type: none"> 1. No likely significant effect due to scale of development and distance to roads within proximity of qualifying habitats. 2. No likely significant effect due to favourable condition of qualifying features in proximity to the proposed development site and distance to those in unfavourable condition due to recreational activity. As identified in the Local Plan HRA, the National Trust are committed to delivering an extensive programme of on-site visitor management and mitigation measures, primarily associated with the units of unfavourable condition that are present at the Dover end of the SAC.

Thanet Coast & Sandwich Bay SPA & Ramsar		
SPA conservation objectives (none specified for the Ramsar site)	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:</p> <ul style="list-style-type: none"> • The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site. 	
Site pressures	<p>Site pressures include:</p> <ul style="list-style-type: none"> • Outdoor sports and leisure activities, recreational activities causing disturbance • Groundwater pollution (point and diffuse sources) • Surface water pollution • Invasive non-native species • Changes in biotic conditions • Changes in species distributions 	
Site condition	<p>Natural England's condition assessments for Sandwich Bay to Hacklinge Marshes SSSI indicate that the SSSI units in this area are in favourable condition.</p> <p>Turnstones are present along the whole SPA and have been present in every sector surveyed. Turnstones are primarily a coastal shoreline species, though small numbers are sometimes found on inland wetlands during the spring and autumn migrations. Surveys carried out between 2001 and 2018 show that there has been a decline in turnstone numbers within the SPA / Ramsar. There has also been a national decline in wintering turnstone numbers. The approximate 50% decline on a local level mirrors the trend seen in a national context.</p> <p>The golden plover population has fluctuated in the last 30 years. Averaging 1853 birds in the late 1990s, numbers peaked at 10,000 -12,000 during the years between 2000/01 to 2004/5. In more recent years the population seems to have declined again to an average of 1,536 birds. The recent change in golden plover numbers is thought to be due to climate change impacts.</p> <p>Little terns last produced fledglings at Shell Ness in 1993. Little Terns are present in the area and have been seen feeding. A decline of little tern has been seen across Kent and it is thought that no young have successfully fledged since 2009.</p>	
Qualifying feature	Possible effect of the project	
	Construction	Operation
Wintering birds (including turnstones and golden plovers)	1. Construction activities, site workers and construction vehicles disturb wintering birds using habitat in or near the project site.	1. Potential for disturbance of wintering birds in the SPA / Ramsar or using functionally linked land. 2. Surface water run-off includes pollutants that cause

	<p>2. Accidental watercourse pollution during construction impacts SPA habitats:</p> <ul style="list-style-type: none"> • sediment run-off as a result of land clearance, excavation, dewatering, stockpiles, wheel washing and movement of materials to and from the site • Release of hydrocarbons and oils from vehicles accessing the site or leakage from oil/fuel storage etc 	contamination to waterbodies in the SPA / Ramsar
Wetland invertebrates (Ramsar)	<p>Accidental watercourse pollution during construction impacts Ramsar habitats:</p> <ul style="list-style-type: none"> • sediment runoff as a result of land clearance, excavation, dewatering, stockpiles, wheel washing and movement of materials to and from the site • Release of hydrocarbons and oils from vehicles accessing the site or leakage from oil/fuel storage etc 	Surface water run-off includes pollutants that cause contamination to waterbodies in the Ramsar
Conclusions		
Wintering birds (including turnstones and golden plovers)	<ol style="list-style-type: none"> 1. No likely significant effect due to distance of SPA/Ramsar and any functionally linked land to site 2. No likely significant effect due to distance of SPA/Ramsar to site 	<ol style="list-style-type: none"> 1. Potential likely significant effect as a result of increased recreational activity. 2. No likely significant effect due to distance of SPA/Ramsar to site
Wetland invertebrates (Ramsar)	No likely significant effect due to distance of SPA/Ramsar to site	No likely significant effect due to distance of SPA/Ramsar to site

5.1. Screening Summary

It is concluded by the competent authority that the project would be likely to have a significant effect on Thanet Coast & Sandwich Bay SPA & Ramsar.

6. Appropriate Assessment

European site and qualifying feature(s)	Potential effect on qualifying features(s)	Potential impact pathways	Source	Avoidance and/or mitigation measures	Adverse effect on site integrity?
Sandwich Bay SPA & Ramsar Wintering birds	Increased levels of disturbance of wintering birds leads to reduced feeding time, so reducing energy intake while also increasing energy use during additional flight events caused by disturbance.	Recreational pressure as a result of the increase in residential population near to sites	Visitors (including walkers, dogs, water users) causing disturbance to birds and their habitats.	A financial contribution towards the SAMMS strategy: monitoring of visitors to/usage of the protected sites and also monitoring / survey of bird populations in the area; a warden and community engagement officer; information boards, sign posts and dog litter bins.	No

6.1. Appropriate Assessment Conclusion

The competent authority (Dover District Council) undertook an objective scientific assessment of the implications of the project on the qualifying features of Thanet Coast and Sandwich Bay SPA / Ramsar site.

Operational effects on Sandwich Bay SAC and Thanet Coast and Sandwich Bay SPA / Ramsar will be addressed by a financial contribution to the implementation of DDC's Strategic Access Management and Monitoring Strategy.

7. Mitigation measures

The competent authority considered the manner in which the project was to be carried out and any conditions and restrictions that it could impose on any authorisation before concluding the integrity test. Should planning permission be granted, the below mitigation measures will be imposed on the project by way of condition.

A financial contribution (amount to be determined following submission of revised layout to accommodate archaeological requirements) towards the SAMP strategy: monitoring of visitors to/usage of the protected sites and also monitoring / survey of bird populations in the area; a warden and community engagement officer; information boards, signposts and dog litter bins.

8. Integrity test

Following the Appropriate Assessment and the consideration of all mitigation measures, Dover District Council, the competent authority, was able to ascertain that the project would not adversely affect the integrity of any international site.

9. References and reports

In reaching the conclusion of the assessment, the competent authority took the following documents into account:

Information to Inform an Habitat Regulations Assessment. Derek Finnie Associates. January 2025.

Citation for Special Area of Conservation: Dover to Kingsdown Cliffs. 2005.

European Site Conservation Objectives for Dover to Kingsdown Cliffs Special Area of Conservation V3. Natural England. November 2018.

European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Dover to Kingsdown Cliffs Special Area of Conservation (SAC). Natural England. February 2019.

Supporting documentation for the conservation status assessment for the habitat: H6210 - Semi-natural dry grasslands and scrubland facies: on calcareous substrates

(Festuco-Brometalia) (article 17 reporting for January 2013 to December 2018). *JNCC. 2019.*

Supporting documentation for the conservation status assessment for the habitat: H1230 - Vegetated sea cliffs of the Atlantic and Baltic coasts (article 17 reporting for January 2013 to December 2018). *JNCC. 2019.*

SSSI condition assessment data accessed 10/11/25 from:
<https://designatedsites.naturalengland.org.uk/>

Dated: 2nd March 2026

Copy sent to Natural England: 2nd March 2026

Annex A – Natural England general advice

Protected Landscapes

Paragraph 189 of the [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 190 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the [Levelling-up and Regeneration Act 2023 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2023/14/section/245) places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

Wider landscapes

Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\) - Landscape Institute](https://www.landscapeinstitute.com/resources/guidelines-for-landscape-and-visual-impact-assessment-glvia3/) for further guidance.

Biodiversity duty

Section 40 of the [Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2006/14/section/40) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the [Complying with the biodiversity duty - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/complying-with-the-biodiversity-duty) for further information.

Designated nature conservation sites

Paragraphs 193-195 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/habitats-regulations-assessments-protecting-a-european-site) and Natural England must be consulted on 'appropriate assessments' (see [Appropriate assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/appropriate-assessment) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the [SSSI Impact Risk Zones \(England\) \(arcgis.com\)](https://arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified ([Sites of special scientific interest: public body responsibilities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/sites-of-special-scientific-interest-public-body-responsibilities)).

Annex A – Natural England general advice

Air Quality

Natural England has produced ['Air pollution and development: advice for local authorities. How to assess sector-specific planning applications that could affect air quality on a protected site'](#). This standing advice is to help planning authorities understand the impact on statutory protected sites from particular developments that emit specific air pollutants. The advice covers emissions of ammonia (NH₃), nitrogen oxides (NO, NO₂ or NO_x), nitrogen deposition, acid deposition and sulphur dioxide (SO₂).

The standing advice is Natural England's formal statutory advice and is a material consideration. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on planning applications with potential air pollution impacts.

Note that this advice cannot be used to assess Nationally Significant Infrastructure Projects (NSIPs) or local plans.

Protected Species

Natural England has produced [Protected species and development: advice for local planning authorities - GOV.UK](#) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to [Wildlife licences: when you need to apply](#) (www.gov.uk) for more information.

Local sites and priority habitats and species

The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging [Local nature recovery strategies - GOV.UK \(www.gov.uk\)](#) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to [Habitats and species of principal importance in England](#) (gov.uk) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the [Brownfield Hub - Buglife](#) for more information and Natural England's [Open Mosaic Habitat \(Draft\) - data.gov.uk](#) (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

Biodiversity and wider environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Unless exempt major development (defined in the [National Planning Policy Framework \(publishing.service.gov.uk\)](#) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement was extended to minor development from April 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from May 2026.

Annex A – Natural England general advice

[Biodiversity Net Gain](#) guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the [Biodiversity Net Gain Planning Practice Guidance](#) (gov.uk).

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to [Calculate biodiversity value with the statutory biodiversity metric](#) for more information. For minor development sites, [The Small Sites Metric](#) may be used where these sites meet the criteria to use this Small Sites Metric. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on [Sites of Special Scientific Interest: managing your land](#)

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

[The Environmental Benefits from Nature Tool - Beta Test Version - JP038 \(naturalengland.org.uk\)](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

[Natural environment - GOV.UK \(www.gov.uk\)](#) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

Ancient woodland, ancient and veteran trees

The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. The [Natural England Access to Evidence - Ancient woodlands Map](#) can help to identify ancient woodland. Natural England and the Forestry Commission have produced [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](#) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 187, 188). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the [Guide to assessing development proposals on agricultural land - GOV.UK \(www.gov.uk\)](#). [Find open data - data.gov.uk](#) on Agricultural Land Classification or use the information available on [MAGIC \(defra.gov.uk\)](#).

The Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites \(publishing.service.gov.uk\)](#) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to [Reclaim minerals extraction and landfill sites to agriculture - GOV.UK \(www.gov.uk\)](#), which provides guidance on soil protection for site restoration and aftercare. The [Soils Guidance \(quarrying.org\)](#) provides detailed guidance on soil handling for mineral sites.

Annex A – Natural England general advice

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Green Infrastructure

For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to [Green Infrastructure Home \(naturalengland.org.uk\)](https://naturalengland.org.uk) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 [GI How Principles \(naturalengland.org.uk\)](https://naturalengland.org.uk). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

The [Green Infrastructure Map \(naturalengland.org.uk\)](https://naturalengland.org.uk) and [GI Mapping Analysis \(naturalengland.org.uk\)](https://naturalengland.org.uk) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation:

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails:

Paragraphs 105, 185, 187 and 193 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development.

Consideration should also be given to the potential impacts on any nearby National Trails. We refer you to [Find your perfect trail, and discover the land of myths and legend - National Trails](#) for information including contact details for the National Trail Officer.

The King Charles III England Coast Path (KCIIECP) is a National Trail around the whole of the English Coast. It has an associated coastal margin subject to public access rights. Parts of the KCIIECP are not on Public Rights of Way but are subject to public access rights. Consideration should be given to the impact of any development on the KCIIECP and the benefits of maintaining a continuous coastal route.

Appropriate mitigation measures should be incorporated for any adverse impacts on Rights of Way, Access land, Coastal access, and National Trails.

Further information is set out in the Planning Practice Guidance on the [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk).