

[REDACTED]

From: [REDACTED]@DOVER.GOV.UK>
Sent: 13 August 2025 09:17
To: [REDACTED]
Subject: 25/00112 Land North West Of Kingsdown Recreation Ground, Kingsdown - draft email

Dear [REDACTED]

I hope you had a nice week off.

I'm still awaiting consultee responses, particularly those from Kent Highway Services. Could you please update me on the current status regarding the archaeology comments?

DDC has reviewed the KCC ecology feedback and concluded that a breeding bird survey would not materially alter the findings already presented in the application. As such, there is no justification for requiring this survey at this stage.

However, a reptile survey remains necessary due to the presence of suitable habitat—specifically the ruderal area in the northern corner of the site and adjacent edge habitats.

Lastly, I'd like to flag that the proposed demolition of the garage to facilitate pedestrian access from the northern boundary has not been assessed for ecological value, including its potential as a bat roost. This remains an outstanding issue that will need to be addressed.

[REDACTED] and I have leave over the next couple of weeks, I would suggest a meeting the week commencing 1st September 2025 to allow for the final comments to be received.

Kind regards,

[REDACTED]

From: [REDACTED]@DOVER.GOV.UK>
Sent: 18 September 2025 09:19
To: Cllr-[REDACTED]; [REDACTED]
Cc: Adam Reynolds
Subject: Re: 25/00112

Dear Cllr [REDACTED]

Thank you for your e-mail and please accept my apologies that you haven't received a response.

[REDACTED] please can you arrange a convenient time to meet with Cllr [REDACTED] to discuss this application (25/00112 - Land North West Of Kingsdown Recreation Ground, Ringwould Road, Kingsdown).

Kind regards,
[REDACTED]



[REDACTED]
Development Management Team Leader (Strategic Sites and Place)
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ
Tel: [REDACTED]
Email: [REDACTED]@DOVER.gov.uk
Web: dover.gov.uk

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From: Cllr-[REDACTED] <Cllr-[REDACTED]@DOVER.GOV.UK>
Sent: 18 September 2025 08:25
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: Fw: 25/00112

Dear [REDACTED]

I have not had a reply to the email below, sent on 5th September.
Please can you respond.

Regards,
[REDACTED]

Cllr [REDACTED]

Mill Hill ward, Deal
[REDACTED]

From: Cllr- [REDACTED]
Sent: Friday, September 5, 2025 15:29
To: [REDACTED]@DOVER.GOV.UK>
Subject: 25/00112

Dear [REDACTED]

I wonder if I could come and see you about some aspects of the above application. mainly about the traffic maps which I would like printed out, and explained by you to me. I find it difficult to understand, these drawings, but when printed out on A3 it is easier to see.

Also, I have now lost the detail of how children walk to the primary school, as I read that the paved footpath idea has gone. So how do the children walk there? - especially with a mum and pushchair in the wet when the path parallel to The Rise through the woods is muddy.

Not sure what days you are at DDC offices? And I have a number of meetings. Can you suggest 2 or 3 days/times . ot Monday, is wednesday possible after 11:30?

Cllr [REDACTED]

Mill Hill ward

Dover

[REDACTED]

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[REDACTED]

From: [REDACTED]@DOVER.GOV.UK>
Sent: 15 October 2025 14:09
To: [REDACTED]; [REDACTED]
Subject: RE: 25/00112 Land North West Of Kingsdown Recreation Ground, Kingsdown
Attachments: 25-00112 251015 Ecology comments.pdf

Dear [REDACTED]

Rather than continue with the below engagement re my informal comments on the application to you, please find attached my formal consultation response for the application for upload to the public case file.

Let me know if/when you need any support with condition wordings.

Kind regards,

[REDACTED]



[REDACTED]
Senior Natural Environment Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ
Email: [REDACTED]@dover.gov.uk
Phone: [REDACTED]
Web: dover.gov.uk

My working days are Tuesdays, Wednesdays, Thursdays and Fridays.

From: [REDACTED]@DOVER.GOV.UK>
Sent: 15 October 2025 09:17
To: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>
Subject: Fw: 25/00112 Land North West Of Kingsdown Recreation Ground, Kingsdown

Hi both,

I have the following comments received from the applicants ecologist who is requesting further wording changes. Can you let me know your thoughts please?

Kind regards



[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: Tuesday, October 14, 2025 18:13
To: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@kitewood.co.uk>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: Re: 25/00112 Land North West Of Kingsdown Recreation Ground, Kingsdown

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Afternoon [REDACTED]

We have taken further advice from our ecologist on the matter and he is still concerned with the response.

The only different in the statement is that the following has been removed "*In my view, the applicant's ecologist has understated the potential for skylarks to be present on and nest at the site; the challenge to his initial omission of any consideration for farmland birds has led to him entrenching his position, rather than being open to and guided by local knowledge and expertise.*"

The other unsubstantiated comments '*the field would likely be purposely managed to ensure its unsuitability for skylarks, if a breeding bird survey was to be required by DDC*' and '*I think part of the reluctance to acknowledge the potential for skylarks is that habitat compensation for skylarks can be difficult to identify and secure*' are still there - which remain potentially libellous.

In addition, we consider that the ecologists desire to have skylark mitigation is also irrelevant in the consultation response.

Can the consultation response therefore be further reviewed and amended accordingly.

Kind Regards

[REDACTED]

Director

Office: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@dhaplanning.co.uk

-

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From: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Sent: Wednesday, October 8, 2025 10:42 AM
To: [REDACTED] [@dhaplanning.co.uk](mailto:[REDACTED]@dhaplanning.co.uk)>; [REDACTED] [@kitewood.co.uk](mailto:[REDACTED]@kitewood.co.uk)>
Subject: Fw: 25/00112 Land North West Of Kingsdown Recreation Ground, Kingsdown

[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]

Please see the amended version.

Kind regards



[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.uk

From: [REDACTED]@DOVER.GOV.UK>
Sent: Wednesday, October 08, 2025 10:40
To: [REDACTED]@DOVER.GOV.UK>
Subject: Fw: 25/00112 Land North West Of Kingsdown Recreation Ground, Kingsdown

Dear [REDACTED] and [REDACTED]

I have reviewed the application and KCC EAS's advice with respect to breeding birds. I have visited the application site and spoken with Nancy Inman (KCC EAS Officer).

I consider the site to have potential for skylarks, and possibly to have had skylarks previously recorded there; KMBRC biological records show that skylarks have been recorded within the 1km square in which the site lies, although the grid reference is not specific enough to conclude that skylarks have definitely been recorded on the site.

Despite this, I do not believe that a breeding bird survey would lead to significantly different conclusions from those currently in the application, so a breeding bird survey requirement cannot be justified at this time. The boundaries of the site, in which most of the breeding birds would be recorded, are retained within the proposed development, and I consider it unlikely that skylarks would be recorded as the field would likely be purposely managed to ensure its unsuitability for skylarks, if a breeding bird survey was to be required by DDC.

I think part of the reluctance to acknowledge the potential for skylarks is that habitat compensation for skylarks can be difficult to identify and secure. If there was a strategic skylark habitat compensation scheme available, to which developers could contribute, it would be much more straightforward. This is something that I am starting to investigate, as there have been several recent development proposals that have identified skylark habitat loss and compensation requirements.

Although I have not specifically reviewed the application with respect to all other ecological matters, I would have expected a reptile survey due to the presence of suitable habitat in the triangle of 'ruderal habitat' at the northern corner of the site, along with the edge habitats. As a minimum, precautionary vegetation clearance for reptiles must be secured in the planning permission, if granted. I also note that a garage is proposed for demolition for the new pedestrian access from the northern boundary. I did not see any assessment of its ecological value (including bat roosting potential) in the submission. Further information should be sought from the applicant on these points.

Kind regards,

[REDACTED]
Senior Natural Environment Officer



Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ

Email: [REDACTED]@dover.gov.uk

Phone: [REDACTED]

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DDC ECOLOGY
CONSULTATION RESPONSE

Application reference: 25/00112

Application site: Woodhill Farm, Ringwoud Road, Kingsdown, CT14 8DD

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

Date of response: 15th October 2025

1. Submitted documents (relevant to DDC Ecology Consultation Response)

- *Ecological Assessment. Derek Finnie Associates. January 2025.*

2. Summary

- 2.1. KCC's Ecological Advice Service is the primary source of ecological advice for this application, and I have reviewed the submission for specific consideration of whether any additional ecological surveys are necessary to inform the determination of the application.
- 2.2. In summary, although no breeding bird surveys are necessary at this time, there is a need to seek additional information from the applicant regarding the building proposed for demolition.

3. Consideration and review of ecological matters

- 3.1. This advice is provided to address any outstanding need for additional ecological survey work to be undertaken by the applicant to ensure that the planning decision can adequately address all potential ecological impacts.
- 3.2. I consider the site to have some potential for skylarks, and possibly to have had had skylarks previously recorded there; Kent and Medway Biological Records Centre biological records show that skylarks have been recorded within the 1km square in which the site lies, although the grid reference is not specific enough to conclude that skylarks have definitely been recorded on the site.
- 3.3. Despite this, I do not believe that a breeding bird survey would lead to significantly different conclusions from those currently in the application, so in my opinion a breeding bird survey requirement is not justified at this time.
- 3.4. The boundaries of the site, in which most of the breeding birds would be recorded, are retained within the proposed development, and I consider it unlikely that skylarks would be recorded, were a survey to be required by DDC.

- 3.5. Although I have not specifically reviewed the application with respect to all other ecological matters, I would have expected a reptile survey due to the presence of suitable habitat in the triangle of 'ruderal habitat' at the northern corner of the site, along with the edge habitats.
- 3.6. As a minimum, precautionary vegetation clearance for reptiles must be secured in the planning permission, if granted.
- 3.7. I also note that a garage is proposed for demolition for the new pedestrian access from the northern boundary. I did not see any assessment of its ecological value (including bat roosting potential) in the submission.
- 3.8. Further information should be sought from the applicant to address these points and ensure that all potential ecological impacts can be addressed in the planning decision.

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

Sent: 03 Nov 2025 12:13:29

To: dms-myemails@dover.gov.uk

Cc:

Subject: Fw: 25/00112 Land North West Of Kingsdown Recreation Ground, Kingsdown- Meeting Notes

Attachments: Woodhill Farm- aiams2_final.pdf, Preliminary Magnetic Gradient.png

Kind regards



[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]@DOVER.GOV.UK>

Sent: 28 October 2025 10:37

To: [REDACTED]@DOVER.GOV.UK>

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

Subject: Fw: 25/00112 Land North West Of Kingsdown Recreation Ground, Kingsdown- Meeting Notes

Hi [REDACTED]

Not sure if [REDACTED] has sent this on to you directly or not, but would you mind reviewing and letting [REDACTED] know within 14 days if you have any comments please.

Thank you,

[REDACTED]



[REDACTED]
Development Management Team Leader (Majors and Minors Applications)

Dover District Council

Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ

Tel: [REDACTED]

Email: [REDACTED]@dover.gov.uk



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From: [REDACTED]@dhaplanning.co.uk>

Sent: 16 October 2025 10:11

To: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>

Cc: [REDACTED]@kitewood.co.uk>; [REDACTED]@dhaplanning.co.uk>

Subject: Re: 25/00112 Land North West Of Kingsdown Recreation Ground, Kingsdown- Meeting Notes

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Morning [REDACTED]

Further to our conversation yesterday.

Extension of Time

The client/applicant confirmed this morning the EoT to 30 November is agreed.

Trees

Updated Arboricultural Impact Assessment attached, if this could be re-consulted on internally.

Archeology

As explained during our phone call yesterday, the company undertaking the geophysical survey completed the physical mapping on Site, but is experiencing technical difficulties in releasing the report.

We are chasing this up and this should be received next week at the latest. The attached plan of the geophysical survey is therefore provided on an without prejudice basis in the absence of the report and note the plan still has a draft watermark on it. This is therefore not currently for wider circulation.

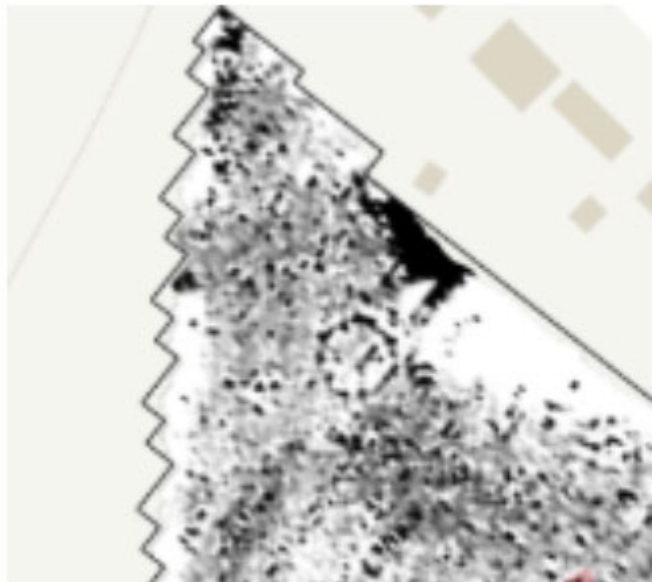
As can be see on the Plan, there is an annular anomaly (where there is small ring) in the northern part of the site.

I provide screen shots below for ease, together with an extract of the current layout plan, which provides an indication of its location on the Site (in the vicinity of plots 53 & 54).

The area of potential archaeology is in a relatively contained part of the Site and as such we remain on the view that this is conditionable.

Whilst we note that the provisions within the NPPF (para 207) which references the need for field evaluation "where necessary", the mere presence of potential archaeological finds is not sufficient to justify the need for archaeological trenching now. The potential for archaeological finds is common on the majority of greenfield sites. The significance of the feature is also not such that it would also justify trenching now.

As further identified above. the area of potential interest is also contained to a limited part of the Site. After further investigations are carried out (post planning) it would also not be so impactful on the development that measures could not be taken to preserve any features if required.



Allied to the above and as discussed there are real and practical issues/restrictions with undertaking any trial trenching since the Site remains in agricultural use, has been seeded and is therefore in crop.

Kitewood therefore cannot simply go into site and undertake the trenching on all or even a limited part of the Site. As you will appreciate this would be hugely damaging to the crop, the site is also under option.

As above, we should have the full report next week, which can then be shared with KCC Archaeology. Notwithstanding, we hope a pragmatic approach can be taken to moving this matter forward to secure the delivery of an allocated site. As part of this, we could review further the potential wording of otherwise standard archaeology conditions if this is also of assistance.

Kind Regards

[Redacted Name]

Director

Office: [Redacted]

Mobile: [Redacted]

Email: [Redacted]@dhaplanning.co.uk

-

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From: [REDACTED]@DOVER.GOV.UK>
Sent: Thursday, October 16, 2025 9:08 AM
To: [REDACTED]@dhaplanning.co.uk>; [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@kitewood.co.uk>; [REDACTED]@dhaplanning.co.uk>
Subject: Re: 25/00112 Land North West Of Kingsdown Recreation Ground, Kingsdown- Meeting Notes

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Dear [REDACTED]

Thank you for your time yesterday.

As we discussed could you please send in the ecology and geophysical studies to [REDACTED] in my absence to ensure that we can start the consultation process. In addition to this would you send me your availability for the week of the 3rd November and I will organise a meeting with [REDACTED].

I am under pressure to try and bring this application to a conclusion, as such, would you agree to the extension of time until the 30th November 2025 please?

Kind regards



[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]@DOVER.GOV.UK>
Sent: 13 October 2025 14:17
To: [REDACTED]@dhaplanning.co.uk>; [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@kitewood.co.uk>; [REDACTED]@dhaplanning.co.uk>
Subject: Re: 25/00112 Land North West Of Kingsdown Recreation Ground, Kingsdown- Meeting Notes

Dear [REDACTED]

I am writing with reference to the archaeological information and when this will be sent over. I have [REDACTED] ready to have a meeting when you are in a position to be able to discuss this.

I am also conscious that we have an agreed an extension of time until the 31st October 2025 and I am on leave from Friday for 2 weeks. I need to reconsult [REDACTED] formally when I have the information, so would be grateful for a further EOT until the 31st November 2025, which means the consultation place can continue when I am on leave.

Kind regards



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: Tuesday, October 07, 2025 12:39
To: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@kitewood.co.uk>; [REDACTED]@dhaplanning.co.uk>
Subject: Re: 25/00112 Land North West Of Kingsdown Recreation Ground, Kingsdown- Meeting Notes

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Afternoon

Thank you.

The gyophys was undertaken towards the end of last week. We are currently pending the feedback/output from this.

We will update as soon as we have something.

Kind Regards

[REDACTED]

Director

Office: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@dhaplanning.co.uk

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From: [REDACTED]@DOVER.GOV.UK>
Sent: Tuesday, October 7, 2025 12:37 PM
To: [REDACTED]@dhaplanning.co.uk>; [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@kitewood.co.uk>; [REDACTED]@dhaplanning.co.uk>
Subject: Re: 25/00112 Land North West Of Kingsdown Recreation Ground, Kingsdown- Meeting Notes

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Hi [REDACTED]
Yes I am working on this matter. Are you able to update us on the archaeological issue?

Kind regards



[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: 07 October 2025 12:34
To: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@kitewood.co.uk>; [REDACTED]@dhaplanning.co.uk>
Subject: Re: 25/00112 Land North West Of Kingsdown Recreation Ground, Kingsdown- Meeting Notes

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Afternoon [REDACTED] & [REDACTED]

Further to our meeting the other week we are pulling together the relevant information agreed. However, to move forward on the ecology matter, can you assist with securing a response to the attached e-mail.

This is critical since our ecologist does not feel able to respond until this matter is resolved and the Officer's response updated/amended accordingly which we did discuss in our meeting would be re-visited.

Kind Regards

[REDACTED]

Director

Office: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@dhaplanning.co.uk

-

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From: [REDACTED]@dhaplanning.co.uk>
Sent: Monday, September 29, 2025 9:50 PM
To: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@kitewood.co.uk>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: Re: 25/00112 Land North West Of Kingsdown Recreation Ground, Kingsdown- Meeting Notes

Evening

Thank you again for your time earlier it was very helpful.

I set out below my notes from the meeting, in terms of actions and next steps which mainly lie with us.

Updated Information Submitted

- DDC confirmed the updated drawings were acceptable and no further changes were sought to the proposals.
- Comments from the Kent Downs National Landscape confirming it was also satisfied with the proposals were noted. Agreed details of landscaping can be addressed via condition.
- DCC continuing to chase KCC PROW Team for an updated consultation response. However, on the basis KCC Highways is satisfied with the proposals this will not prevent the application from being reported to planning committee.

Outstanding Matters

- Full Arb Assessment has been prepared as requested.

- Further ecology note to be provided. But ecologist has determined there is no need for bat surveys and only a single reptile has been found. Agreed reptile mitigation can be addressed via condition.
- Officers to review e-mail from DDC Ecologist before publishing it on its website, regarding suggestion of activities on site.
- Kitewood and its archaeologists have had a meeting with [REDACTED] to discuss archeological potential. As a first step geophys is being undertaken this week to determine the likely present or not of archeological finds. Agreed DDC to arrange a meeting with [REDACTED] to discuss the outcomes of the geophys.

Next Steps

Early next week DHA to provide:

- Arb Assessment
- Outcome of the Geophys
- Ecology Note
- Draft Heads of Terms including affordable housing cascade/thoughts for tenure.
- DDC confirmed 21 day re-consultation period for amended information. Although this will be limited and internal consultee comments can be chased internally
- Agreed target 27 November Planning Committee. DDC outlined a 3wk lead in for reports

If you think I have missed anything, 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: Wednesday, September 24, 2025 10:24 AM
To: [REDACTED]@dhaplanning.co.uk>; [REDACTED]@kitewood.co.uk>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: Fw: 25/00112 Land North West Of Kingsdown Recreation Ground, Kingsdown

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

Dear both,

As requested here are the comments received from the DDC Senior Natural Environment Officer.

Kind regards



[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

Hi [REDACTED]

We had a subsequent discussion regarding the section on reptiles, please also share this addendum, which reflects the clarification I orally provided to you.

If I had formalised our conversation in writing at the time, I would have updated the final paragraph to say:

Although I have not specifically reviewed the application with respect to all other ecological matters, I would have expected a reptile survey due to the presence of suitable habitat in the triangle of 'ruderal habitat' at the northern corner of the site, along with the edge habitats. Without a survey, as a minimum, precautionary vegetation clearance for reptiles must be secured in the planning permission, if granted, but if we don't have certainty that the off-site ruderal habitat will be retained and protected, a reptile survey will provide greater certainty regarding any necessary mitigation measures that need to be implemented. I also note that a garage is proposed for demolition for the new pedestrian access from the northern boundary. I did not see any assessment of its ecological value (including bat roosting potential) in the submission. Further information should be sought from the applicant on these points.

I have reviewed the application and KCC EAS's advice with respect to breeding birds. I have visited the application site and spoken with [REDACTED] (KCC EAS Officer).

In my view, the applicant's ecologist has understated the potential for skylarks to be present on and nest at the site; the challenge to his initial omission of any consideration for farmland birds has led to him entrenching his position, rather than being open to and guided by local knowledge and expertise.

I consider the site to have potential for skylarks, and possibly to have had skylarks previously recorded there; KMBRC biological records show that skylarks have been recorded within the 1km square in which the site lies, although the grid reference is not specific enough to conclude that skylarks have definitely been recorded on the site.

Despite this, I do not believe that a breeding bird survey would lead to significantly different conclusions from those currently in the application, so a breeding bird survey requirement cannot be justified at this time. The boundaries of the site, in which most of the breeding birds would be recorded, are retained within the proposed development, and I consider it unlikely that skylarks would be recorded as the field would likely be purposely managed to ensure its unsuitability for skylarks, if a breeding bird survey was to be required by DDC.

I think part of the reluctance to acknowledge the potential for skylarks is that habitat compensation for skylarks can be difficult to identify and secure. If there was a strategic skylark habitat compensation scheme available, to which developers could contribute, it would be much more straightforward. This is something that I am starting to investigate, as there have been several recent development proposals that have identified skylark habitat loss and compensation requirements.

Although I have not specifically reviewed the application with respect to all other ecological matters, I would have expected a reptile survey due to the presence of suitable habitat in the triangle of 'ruderal habitat' at the northern corner of the site, along with the edge habitats. As a minimum, precautionary vegetation clearance for reptiles must be secured in the planning permission, if granted. I also note that a garage is proposed for demolition for the new pedestrian access from the northern boundary. I did not see any assessment of its ecological value (including bat roosting potential) in the submission. Further information should be sought from the applicant on these points.

Kind regards,

[REDACTED]

[REDACTED]

Senior Natural Environment Officer

Dover District Council

Council Offices, White Cliffs Business Park, Whitfield,

Dover CT16 3PJ

Email: [REDACTED]@dover.gov.uk

Phone: [REDACTED]

Web: dover.gov.uk



My working days are Tuesdays, Wednesdays, Thursdays and Fridays.

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From: [REDACTED]@DOVER.GOV.UK>
Sent: 10 November 2025 09:25
To: SupportAssistants
Subject: Fw: 25/00112 - land to the north of Kingsdown recreation grounds
Attachments: Kingsdown Further Ecology Info.pdf

Please can you upload this as additional information and reconsult [REDACTED] I have requested this on uniform.

Kind regards



[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: 05 November 2025 20:45
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@dhaplanning.co.uk>
Subject: RE: 25/00112 - land to the north of Kingsdown recreation grounds

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Evening [REDACTED]

Please see the attached response on the Ecology matters raised in respect of application 25/00112, if you could reconsult the Council's Ecologist accordingly.

Many thanks

[REDACTED]
Lucy Wilford
Director

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

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From: [REDACTED]
Sent: 26 October 2025 12:34
To: [REDACTED]@DOVER.GOV.UK>
Subject: RE: 25/00112 - land to the north of Kingsdown recreation grounds

Afternoon [REDACTED]

I think you have misunderstood the para. There is no Air Quality assessment with this application. It is referring to the assessment which accompanied the Local Plan.

Kind Regards

[REDACTED]
Director

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

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From: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Sent: 16 October 2025 13:31
To: [REDACTED] [@dhaplanning.co.uk](mailto:[REDACTED]@dhaplanning.co.uk)>
Subject: 25/00112 - land to the north of Kingsdown recreation grounds

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Dear [REDACTED]

I am looking at the ecology issues and the shadow HRA. Within the report it sets out at paragraph 3.2.3 about broad mitigation measures are detailed within the Air Quality assessment and will be implemented as part of the plan. Are you able to resend the air quality assessment please, as I am unable to locate the document.

Kind regards



[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)
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██████████
DHA Planning

VIA EMAIL

29th October 2025

Ref: ██████████/KF/LW03

Dear ██████████

RE: 25/00112 WOODHILL FARM, KINGSDOWN – ADDITIONAL ECOLOGY INFORMATION

Further to our recent discussion, I have reviewed the ecology consultation response submitted by Dover District Council (DDC), which has been received in addition to that submitted by Kent Advisory Service. DCC requested additional information on the potential present of reptile along the northern side of the site as well as survey information relating the existing residential garage that would be demolished to create the pedestrian access.

I have presented the requested information below.

Reptiles.

A reptile survey was undertaken in September and October 2025, following the methodology presented by Froglife (1999), with a total of 20 refugia being set out along the northern site boundary. Several of the refugia were removed or tampered with by third parties. These were replaced as soon as practically possible; it is not believed that this affected the efficacy of the survey significantly.

As can be seen from Table 1, a low population of common lizard and a single slow worm were recorded along the northern edge of the Site.

Given the low population of these two reptiles species, and the previous land used which included regular ploughing of the Site, it is recommended that a Reasonable Avoidance Method Statement, involving habitat manipulation, be implemented prior to the commencement not sure works. There is ample opportunity for new and improved reptile habitat within the green infrastructure within the scheme to ensure there no adverse effect on the conversation status of the local reptile population.



T: 0118 989 10 86
E: info@derekfinnie.com
W: www.derekfinnie.com

20 Soames Place, Mulberry Grove
Wokingham, Berkshire RG40 5AT



Table 1. Summary of Reptile Survey Results

Date	Common Lizard			Slow worm		
	M	F	SA	M	F	SA
08/09/2025	-	-	-	-	-	-
12/09/2025	1	-	-	-	-	-
17/09/2025	-	1	2	-	-	1
19/09/2025	-	-	2	-	-	-
23/09/2025	-	-	-	-	-	-
01/10/2025	-	-	2	-	-	-
02/10/2025	-	-	-	-	-	-
06/10/2025	-	-	-	-	-	-
17/10/2025	-	-	1	-	-	-

Garage – Bat Assessment

There is a requirement to demolish an existing garage associated with the dwelling ‘Winstead’ on Glen Road to allow for the creation of a pedestrian access. To ensure there is no breach of the relevant wildlife legislation, an assessment of the buildings potential to support roosting bats in line with BCT guidance (2023) was undertaken on the 18th September 2025.

The building is a single storey domestic garage located immediately to the south west of the dwelling. As can be seen from Plates 1 – 3, it is a brick built structure with flat roof, that gently slopes to the rear. There is no internal void space, with the internal area being well illuminated by a window on the northern aspect.

The roof is finished with felt, which is intact throughout. The brickwork is as also in good condition ,as are the wooden soffit boards. No potential ingress points were noted.

Internally, the space is well lit and has numerous cobwebs, often indicative of a lack of bat activity. No signs of droppings or feeding remains were noted.

Overall the garage was assessed as having negligible potential to support roosting bats, hence no further surveys are required, nor is any mitigation required.

I hope you find this useful, but if you require any additional information, please do not hesitate to contact me.

Regards,
For and on behalf of Derek Finnie Associates Ltd.



Derek Finnie CEnv MIEEnvSc MCIEEM
Managing Director



PLATES



Plate 1. General view of the front of the garage.



Plate 2. General view of the side of the garage.



Plate 3. General view of the internal area of the garage.

From: [REDACTED]@dhaplanning.co.uk>
Sent: 28 January 2026 12:20
To: [REDACTED]; [REDACTED]; [REDACTED]
Cc: [REDACTED]@kitewood.co.uk'
Subject: RE: 25/00112 Land North West Of Kingsdown Recreation Ground: Potential Layout Changes

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Afternoon [REDACTED]

On behalf of Kitewood I can confirm that the EoT until 27 March is agreed.

As also discussed yesterday, we are in the progress of updating plans to reflect the layout changes previously shared with you and you confirmed to be acceptable. We will have the drawing pack up dated including BNG.

As discussed on the phone, if you can let us know what this highways cumulative point was which became a sticking point for Members on another application at Committee that would be helpful and we can review.

Kind Regards

[REDACTED]
Director

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

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From: [REDACTED]@DOVER.GOV.UK>
Sent: 28 January 2026 10:34
To: [REDACTED]@dhaplanning.co.uk>; [REDACTED]@dhaplanning.co.uk>; [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@kitewood.co.uk' [REDACTED]@kitewood.co.uk>
Subject: Re: 25/00112 Land North West Of Kingsdown Recreation Ground: Potential Layout Changes

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Morning [REDACTED]

Following our conversation yesterday, I can confirm that the reports for the March committee need to be with Democratic Services by 16 March 2026.

As the application will need to be readvertised, we'll need to allow for the statutory 21-day consultation period, along with sufficient time for me to prepare the committee report.

I appreciate that we previously agreed an extension of time until 31 January 2026. However, in light of the committee timescales, would you be able to agree to a revised extension of time until 27 March 2026?

Please let me know if you're happy to proceed on that basis.

Kind regards

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.uk

From: [REDACTED]@dhaplanning.co.uk>
Sent: 27 January 2026 12:11
To: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@dhaplanning.co.uk>; [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@kitewood.co.uk' [REDACTED]@kitewood.co.uk>
Subject: RE: 25/00112 Land North West Of Kingsdown Recreation Ground: Potential Layout Changes

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Morning [REDACTED]

Appreciate the below was sent Friday, but can you advise when the Council would be in a position to respond to the below?

We are aiming to amend the pack this week.

Left a voicemail so happy to discuss if easier. I am around all day.

Kind Regards

██████████
Director

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

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From: ██████████
Sent: 23 January 2026 11:44
To: ██████████@DOVER.GOV.UK>; ██████████@dhaplanning.co.uk>;
██████████@DOVER.GOV.UK>
Cc: ██████████@kitewood.co.uk' <██████████@kitewood.co.uk>
Subject: RE: 25/00112 Land North West Of Kingsdown Recreation Ground: Potential Layout Changes
Importance: High

Morning ██████████

The design Team has now had time to consider the changes further and I attach for your consideration an amended layout.

For ease of comparison, I provide on the left a screen shot of the previously proposed changes to the layout in the north-eastern corner of the Site, against the now proposed changes in the centre.

On the far right, is the layout as currently submitted.

In response to the feedback provided we have:

- Taken the turning area outside the archaeological zone
- Removed the garage at the end of the road by plot 49
- Adjusted the arrangement of the terraced homes (52-56) so it can be seen that the parking spaces to the front of the properties provide space for soft landscaping. Soft planting is also accommodated to the south in front of plots 50 & 51.

The changes demonstrate that suitable soft landscaping can be incorporated ensuring the space is not dominated by hard landscaping and follows the design approach previously submitted.

We would be grateful if you could advise if this now addresses the Council's concerns. At which point, we can then up-date the planning drawing pack.

On the basis that the proposals represent a reduction in housing and we have reduced the development area, we are not anticipating that any of the technical reports will need to be revised.





Kind Regards

[Redacted]
Director

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

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From: [REDACTED]
Sent: 16 January 2026 15:08
To: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>; [REDACTED] [@dhaplanning.co.uk](mailto:[REDACTED]@dhaplanning.co.uk)>;
[REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Cc: [REDACTED] [@kitewood.co.uk](mailto:[REDACTED]@kitewood.co.uk)
Subject: RE: 25/00112 Land North West Of Kingsdown Recreation Ground: Potential Layout Changes

Afternoon

Just to say we are reviewing the feedback and hopefully we can come back to you next week.

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: 15 January 2026 10:36
To: [REDACTED] [@dhaplanning.co.uk](mailto:[REDACTED]@dhaplanning.co.uk)>; [REDACTED] [@dhaplanning.co.uk](mailto:[REDACTED]@dhaplanning.co.uk)>;
[REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Cc: [REDACTED] [@kitewood.co.uk](mailto:[REDACTED]@kitewood.co.uk)
Subject: Re: 25/00112 Land North West Of Kingsdown Recreation Ground: Potential Layout Changes

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Dear [REDACTED]

Further to [REDACTED] comments below, if the turning point is flipped, I am concerned that it may encroach into the landscape buffer required by policy. I wanted to flag this now while you are reviewing the layout.

Kind regards



██████████
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

From: ██████████@kent.gov.uk <██████████@kent.gov.uk>
Sent: Tuesday, January 13, 2026 14:51
To: ██████████@DOVER.GOV.UK>; ██████████@dhaplanning.co.uk
██████████@dhaplanning.co.uk>; ██████████@dhaplanning.co.uk
<██████████@dhaplanning.co.uk>; ██████████@DOVER.GOV.UK>
Cc: ██████████@kitewood.co.uk <██████████@kitewood.co.uk>
Subject: Re: 25/00112 Land North West Of Kingsdown Recreation Ground: Potential Layout Changes

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Hi ██████████

Yes agreed, from an archaeological perspective the indicated exclusion zone around the ring-ditches looks reasonable, but the turning point looks too close where it extends into the archaeological offset area - can the turning point be flipped or slightly rotated to pull it further away from the ring-ditch and outside the 8m offset area?

Many thanks,
██████████

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

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From: ██████████@DOVER.GOV.UK>
Sent: 12 January 2026 15:52
To: ██████████@dhaplanning.co.uk>; ██████████@dhaplanning.co.uk>; ██████████@DOVER.GOV.UK>; ██████████@kent.gov.uk>
Cc: ██████████@kitewood.co.uk>
Subject: Re: 25/00112 Land North West Of Kingsdown Recreation Ground: Potential Layout Changes

Dear all,

I am writing with regards to the above planning application and apologise for the delay in responding. I am unable to provide comments from an archaeological perspective, but I am sure [REDACTED] will be able to advise on this. That said, the turning point does appear to be in close proximity to the ring ditch.

With regard to the proposed layout, I have some concerns about the position of the garage serving Plot 52. As currently shown, it becomes the main focal point when entering this part of the site. In addition, the revised layout places all parking to the front of the properties, which significantly reduces opportunities for planting to soften the street scene. This results in a large expanse of hardstanding and creates a cramped, overdeveloped appearance within the north-west corner of the site.

I would suggest that you may wish to revisit the layout and I will be happy to look at any alternatives.

Kind regards



[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: 05 January 2026 14:07
To: [REDACTED]@dhaplanning.co.uk>; [REDACTED]@DOVER.GOV.UK>; [REDACTED]
[REDACTED]@DOVER.GOV.UK>; [REDACTED]@kent.gov.uk <[REDACTED]@kent.gov.uk>
Cc: [REDACTED]@kitewood.co.uk>; [REDACTED]@rps.tetrattech.com>
Subject: 25/00112 Land North West Of Kingsdown Recreation Ground: Potential Layout Changes

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Good Afternoon & Happy New Year

I was just following up on the below.

Appreciate that we have had Christmas and many of us including ourselves have been off on leave.

However, do you think we could receive comments back on the sketch layout this week?

[REDACTED]@kent.gov.uk appreciate details of the layout are a matter for the Council. However, it would be helpful if you could advise if the proposals provide a suitable off-set?

Kind Regards

[REDACTED]

Director

Office: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@dhaplanning.co.uk

-

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From: [REDACTED]@dhaplanning.co.uk>

Sent: 16 December 2025 14:25

To: [REDACTED]@dover.gov.uk>; [REDACTED]@dover.gov.uk>

Cc: [REDACTED]@kitewood.co.uk>; [REDACTED]@dhaplanning.co.uk>;

[REDACTED]@rps.tetrattech.com>; [REDACTED]@kent.gov.uk

Subject: 25/00112 Land North West Of Kingsdown Recreation Ground: Potential Layout Changes

Good afternoon [REDACTED] and [REDACTED]

I hope you're both well. I'm writing in [REDACTED] absence to request your informal feedback on the attached site layout sketch, following recent discussions with Ben Found of KCC Archaeology.

In summary, the revised layout reduces the overall number of units by six and adjusts the mix to allow for the preservation of archaeological features to the north of the Site with an appropriate buffer. Your informal comments will help ensure the design approach aligns with expectations before we proceed with updating the drawing pack.

Updated Site Layout Sketch

The attached sketch illustrates how 64 homes (a reduction of 6 units) could be accommodated while preserving the burial features in the north in situ, with an approximate 8m buffer.

Implications for Unit Mix

To maintain these archaeological features and the buffer zone in situ, the unit mix has been adjusted slightly. For ease of reference, the unit mix changes are summarised below:

Bedrooms	Previously submitted Unit Mix Received by the Council 15 July 2025	Updated Unit Mix proposed with this sketch to preserve the archaeological features to the north	Difference
Affordable			
2 bed flats	4	0	-4
2 bed house	10	14	+4
3 bed house	5	5	0
4 bed house	2	0	-2
Total	21	19	-3
Private			
1 bed house	2	0	-2
2 bed house	14	11	-3
3 bed house	19	17	-3
4 bed house	14	17	+3
Total	49	45	-3
Grand Total	70	64	-6

Please could we have your comments on these proposed layout changes before any drawing pack updates take place?

If possible, we would appreciate receiving your feedback before the Christmas break.

Many Thanks,

[Redacted]

[Redacted]

Senior Planner

Email: [Redacted]@dhaplanning.co.uk

Office: [Redacted]

Mobile: [Redacted]

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From: [REDACTED]@DOVER.GOV.UK>
Sent: 10 February 2026 13:40
To: [REDACTED]
Subject: RE: 535089 25_00112 NE Response
Attachments: Kingsdown HRA Feb26.docx

Hi [REDACTED]

Revised HRA attached!



[REDACTED]
Senior Natural Environment Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ
Email: [REDACTED]@dover.gov.uk
Phone: [REDACTED]
Web: dover.gov.uk

My working days are Tuesdays, Wednesdays, Thursdays and Fridays.

From: [REDACTED]@DOVER.GOV.UK>
Sent: 10 February 2026 11:25
To: [REDACTED]@DOVER.GOV.UK>
Subject: Fw: 535089 25_00112 NE Response

Hi [REDACTED]

I thought I had done the HRA as you suggested, but clearly I have misunderstood. Could you advise me please on where I have gone wrong?

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

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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] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
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

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Good Afternoon,

Please find attached the HRA for the above site.

Kind regards



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

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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

Contents

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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).
------------------------------------	---

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)	<p>1. No likely significant effect due to distance of SPA/Ramsar and any functionally linked land to site</p> <p>2. No likely significant effect due to distance of SPA/Ramsar to site</p>	<p>1. Potential likely significant effect as a result of increased recreational activity.</p> <p>2. No likely significant effect due to distance of SPA/Ramsar to site</p>
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 SAMM 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: 10th February 2026

Copy sent to Natural England: XX

From: [REDACTED]@DOVER.GOV.UK>
Sent: 23 Feb 2026 03:34:19
To: dms-myemails@dover.gov.uk
Cc:
Subject: Fw: DOV/25/00112
Attachments:

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]@DOVER.GOV.UK>
Sent: 20 February 2026 12:57
To: [REDACTED]@dhaplanning.co.uk>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: Re: DOV/25/00112

Dear [REDACTED]

Thank you for your emails. I have forwarded the plans to the technical team for uploading.

Regarding conditions, our committee reports only need to reference the condition topic (e.g. plans, SuDS, drainage, etc.) and do not require full wording, as members may add or remove conditions during the meeting. Following committee and resolution, happy to work up the full condition wording promptly and we will share with you.

In terms of the Heads of Terms, happy to work on and agree these now or post ctte. Would you prefer to prepare a draft on your side, or would you like the Council to produce the first version?

Thank you,
[REDACTED]



[REDACTED]
Development Management Team Leader (Majors and Minors Applications)
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ
Tel: [REDACTED]
Email: [REDACTED]@dover.gov.uk

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Subject: RE: DOV/25/00112

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Evening [REDACTED]

The requested archaeological addendum will be provided separately.

But to assist we have also had prepared a DAS addendum further illustrating how the proposals accommodate the feature, plus updated street scenes, if these can be added to the application documents.

Kind Regards

[REDACTED]
Director

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

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From: [REDACTED]
Sent: 17 February 2026 14:08
To: [REDACTED]@DOVER.GOV.UK>

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

Subject: RE: DOV/25/00112

Afternoon [REDACTED]

Further to the below I can confirm this is being done.

Do we need to agree a list of conditions and HoTs?

Kind Regards

[REDACTED]
Director

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

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From: [REDACTED]@DOVER.GOV.UK>
Sent: 16 February 2026 16:37
To: [REDACTED]@dhaplanning.co.uk>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: DOV/25/00112

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Dear [REDACTED]

Thank you for the updated plans.

I appreciate you have provided a covering letter regarding the changes to the layout in connection with archaeology. Given the level of interest surrounding the site I would suggest you provide the findings of the geo physical survey and put it in an addendum. I have already had a Cllr requesting the findings of the archaeological work.

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.uk

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From: [REDACTED]@dhaplanning.co.uk>
Sent: 02 March 2026 10:12
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: DOV/25/00112

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Good Morning

Further to the below, we provide a draft list of HoT.

If you have a draft list of planning conditions we can comment on, that would be helpful.

Draft HoT
30% Affordable housing
Primary education
Secondary education expansion
SEND
Community Learning and Skills
Integrated Children's Services
Library, Registrations and Archives Service
Adult Social Care
Waste
NHS
Accessible Greenspace
Children's Equipped Play Space (contribution towards off-site provision)
Natural Grass Pitches
Artificial Grass Pitches
Strategic Highway Improvement contributions
Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy

Natural England Response

I note a response from NE has just been uploaded, but it has a date of 27th Feb. Is this the latest response? I just see in its reply to the Council's screening assessment it has not completed the relevant section on whether it agrees or disagrees with the Council's assessment.

CPRE Letter

On a slightly separate note, I have noted the letter of objection from CPRE, which does fail to acknowledge that the Site is allocated. Notwithstanding, I do note it cross references to an Appeal in Ashford as lending support to its objection.

Should this be raised by Members, I have looked at this and note that the Appeal relates to a Solar Farm across a 46.62ha site comprising 75,000 PV panels which necessitates the removal of orchards. It was not in dispute between the Appellant and the Council that the development would have a “significant adverse impact” on landscape designations. Due to the nature and scale of the development, the Inspector found the proposal would not be sensitively located or designed to avoid or minimise adverse impacts on the designated area.

This does not provide a comparable basis and the National Landscape Unit in this instance does not raise objection to the proposals with regards to impact.

Kind Regards

██████████
Director

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

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From: ██████████
Sent: 20 February 2026 14:04
To: ██████████@DOVER.GOV.UK>
Cc: ██████████@DOVER.GOV.UK>; ██████████@dhaplanning.co.uk>
Subject: RE: DOV/25/00112

Afternoon ██████████

I am on leave today, but I think we did prepare HoT and I will come back to you next week.

However, for the purposes of the HoT Kite would like to discuss an affordable housing cascade, in terms of different tenure types/proportions should no viable options be received for the Council’s preferred tenure. Is this something we need to discuss now/to be set out in the committee report, as a general intention?

Kind Regards

Director

Office: [REDACTED]
Mobile: [REDACTED]
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From: [REDACTED]@DOVER.GOV.UK>
Sent: 20 February 2026 12:57
To: [REDACTED]@dhaplanning.co.uk>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: Re: DOV/25/00112

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Dear [REDACTED]

Thank you for your emails. I have forwarded the plans to the technical team for uploading.

Regarding conditions, our committee reports only need to reference the condition topic (e.g. plans, SuDS, drainage, etc.) and do not require full wording, as members may add or remove conditions during the meeting. Following committee and resolution, happy to work up the full condition wording promptly and we will share with you.

In terms of the Heads of Terms, happy to work on and agree these now or post ctte. Would you prefer to prepare a draft on your side, or would you like the Council to produce the first version?

Thank you,



██████████
Development Management Team Leader (Majors and Minors Applications)

Dover District Council
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ

Tel: ██████████
Email: ██████████@dover.gov.uk

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Sent: 18 February 2026 20:29
To: ██████████@DOVER.GOV.UK>
Cc: ██████████@DOVER.GOV.UK>
Subject: RE: DOV/25/00112

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Evening ██████████

The requested archaeological addendum will be provided separately.

But to assist we have also had prepared a DAS addendum further illustrating how the proposals accommodate the feature, plus updated street scenes, if these can be added to the application documents.

Kind Regards

██████████
Director

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

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From: [REDACTED]
Sent: 17 February 2026 14:08
To: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Cc: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Subject: RE: DOV/25/00112

Afternoon [REDACTED]

Further to the below I can confirm this is being done.

Do we need to agree a list of conditions and HoTs?

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: 16 February 2026 16:37
To: [REDACTED] [@dhaplanning.co.uk](mailto:[REDACTED]@dhaplanning.co.uk)>
Cc: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Subject: DOV/25/00112

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

Dear [REDACTED]

Thank you for the updated plans.

I appreciate you have provided a covering letter regarding the changes to the layout in connection with archaeology. Given the level of interest surrounding the site I would suggest you provide the findings of the geo physical survey and put it in an addendum. I have already had a Cllr requesting the findings of the archaeological work.

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

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From: [REDACTED]@DOVER.GOV.UK>
Sent: 02 March 2026 16:27
To: SM-NE-Consultations (NE)
Subject: Re: 541171 25_00112 NE Response
Attachments: Kingsdown HRA Feb26.docx

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]@dover.gov.uk
Web: dover.gov.u

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 24 February 2026 08:46
To: [REDACTED]@DOVER.GOV.UK>
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 \(www.gov.uk\)](http://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 \(www.gov.uk\)](https://www.gov.uk/guidance/protected-sites-and-areas-how-to-review-planning-applications)

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

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 Signature]

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] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
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] <[\[REDACTED\]@dover.gov.uk](mailto:[REDACTED]@dover.gov.uk)>. [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] <[\[REDACTED\]@dover.gov.uk](mailto:[REDACTED]@dover.gov.uk)>
Web: dover.gov.u

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

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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,

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] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
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, Ringwould Road, Kingsdown

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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] <[\[REDACTED\]@dover.gov.uk](mailto:[REDACTED]@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	<p>The SAC is designated on the basis of supporting the Annex I habitats:</p> <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	<p>The SPA qualifies under Article 4.1 of the EC Birds Directive by supporting a nationally important breeding population of the following species:</p> <ul style="list-style-type: none"> • Little tern <i>Sterna albifrons</i>
	<p>The SPA qualifies under Article 4.1 of the EC Birds Directive by supporting a nationally important wintering population of the following species:</p> <ul style="list-style-type: none"> • Golden plover <i>Pluvialis apricaria</i>
	<p>The SPA qualifies under Article 4.2 by regularly supporting an internationally important wintering population of the following species:</p> <ul style="list-style-type: none"> • Turnstone <i>Arenaria Interpres</i>
	<p>The site also supports nationally important wintering populations of</p> <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).
------------------------------------	---

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)	<p>1. No likely significant effect due to distance of SPA/Ramsar and any functionally linked land to site</p> <p>2. No likely significant effect due to distance of SPA/Ramsar to site</p>	<p>1. Potential likely significant effect as a result of increased recreational activity.</p> <p>2. No likely significant effect due to distance of SPA/Ramsar to site</p>
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 SAMM 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: 10th February 2026

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