

**INDEPENDENT EXAMINATION OF THE LANGDON  
NEIGHBOURHOOD DEVELOPMENT PLAN 2023-2040**

EXAMINER: DEREK STEBBING BA (Hons) DipEP MRTPI

Examination Ref: 01/DAS/LNP

Chris Shaw  
Chair - Langdon Parish Council

Peter Martin  
Dover District Council

28 August 2025

Dear Mr Shaw and Mr Martin

**LANGDON NEIGHBOURHOOD DEVELOPMENT PLAN EXAMINATION**

Following the submission of the Langdon Neighbourhood Plan (the Plan) for examination, I would like to clarify several initial procedural matters. I also have two questions for Langdon Parish Council (the Qualifying Body), to which I would like to receive a written response(s) by **Friday 26 September 2025** if possible.

**1. Examination Documentation**

I can confirm that I am satisfied that I have received the draft Plan and accompanying documentation, including the Basic Conditions Statement, the Consultation Statement, the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Report, and the Regulation 16 representations, to enable me to undertake the examination.

**2. Site Visit**

I will aim to carry out a site visit to the neighbourhood plan area during the week beginning 15 September 2025. The site visit will assist in my assessment of the draft Plan, including the issues identified in the representations.

The visit will be undertaken unaccompanied. It is very important that I am not approached to discuss any aspects of the Plan or the neighbourhood area, as this may be perceived to prejudice my independence and risk compromising the fairness of the examination process.

I may have some additional questions, following my site visit, which I will set out in writing should I require any further clarification.

**3. Written Representations**

At this stage, I consider the examination can be conducted solely by the written representations procedure, without the need for a hearing. However, I will reserve the option to convene a hearing should a matter(s) come to light where I consider that a hearing is necessary to ensure the adequate examination of an issue, or to ensure that a person has a fair chance to put a case.

#### 4. Further Clarification

From my initial assessment of the Plan and supporting documents, I have identified two matters where I require some additional information from the Parish Council.

I have two questions seeking further clarification, which I have set out in the Annex to this letter. I would be grateful if you can seek to provide a written response(s) by **Friday 26 September 2025**.

#### 5. Examination Timetable

As you will be aware, the intention is to examine the Plan (including conduct of the site visit) with a view to providing a draft report (for 'fact checking') within around 6 – 8 weeks of submission of the draft Plan. However, as I have raised two questions, I must provide you with sufficient opportunity to reply. Consequentially, and dependent on when you are in a position to respond, the examination timetable may be extended. Please be assured that I will aim to mitigate any delay, should it arise, as far as is practicable. The IPe office team will seek to keep you updated on the anticipated delivery date of the draft report.

If you have any process questions related to the conduct of the examination, which you would like me to address, please do not hesitate to contact the office team in the first instance.

In the interests of transparency, may I prevail upon you to ensure that a copy of this letter is placed on the Parish Council and District Council's websites.

Thank you in advance for your assistance.

Yours sincerely

*Derek Stebbing*

Examiner

## ANNEX

From my initial reading of the Langdon Neighbourhood Plan 2023-2040 (Submission Version dated May 2025), the supporting evidence and the representations that have been made to the Plan, I have the following two questions for the **Qualifying Body**. I have requested the submission of responses **by Friday 26 September 2025**, though an earlier response would be much appreciated. All of the points set out below flow from the requirement to satisfy the Basic Conditions.

### Question 1: Re. Groundwater Source Protection Zones (SPZs)

Representations submitted at the Regulation 16 consultation stage by Southern Water state that much of Langdon Parish overlies sensitive groundwater Source Protection Zones (SPZs), from which public drinking water supplies are drawn. Southern Water request that the Neighbourhood Plan should include reference to Southern Water's 'SuDS within SPZ guidance' which, inter alia, requires a full hydrogeological risk assessment of development sites to inform SuDS design proposals.

Southern Water state that this representation repeats a previous representation made at the Regulation 14 consultation stage, which was not the subject of any subsequent amendments to the draft Plan by the Qualifying Body. My study of the Consultation Statement (at pages 31-39) records that the only action that was taken in response to Southern Water's representations at that stage as being *"This has been added but it (sic) largely addressed in the DDLP"*. My interpretation of the draft Plan is that this only related to an amendment to Policy L3 (Character and Design of Development) and not to any matters relating to the SPZs.

I recognise that the adopted Dover District Local Plan to 2040 (adopted October 2024) does contain Policy NE5 (Water Supply and Quality) which addresses SPZs across the district. However, it does not make reference to Southern Water's specific guidance.

It is my assessment that the Plan should be making appropriate reference to the necessity to protect the SPZs that extend across large parts of Langdon Parish, in order to provide more specific local guidance for Langdon Parish and to assist users of the Plan.

It is my experience that the necessity to protect groundwater Source Protection Zones is a significant policy requirement for Neighbourhood Plans in other parts of Kent, one similar example being the Fawkham Neighbourhood Plan (see Policy FNP5) at:

[https://www.sevenoaks.gov.uk/downloads/file/4246/fawkham\\_neighbourhood\\_plan\\_2023-2040](https://www.sevenoaks.gov.uk/downloads/file/4246/fawkham_neighbourhood_plan_2023-2040)

Although Southern Water only seek appropriate references to their guidance, I do not view it as inappropriate that the matter could be addressed by an additional Policy in the Plan.

Can the **Qualifying Body** please provide me with a Note advising how they would wish to amend the draft Plan in order to take account of the matters raised above, including any draft additional text and/or amendments which I may consider as a potential modification to the draft Plan.

(The **Qualifying Body** should also note that Southern Water has also sought a similar amendment to the 'Langdon Design Guidance and Codes' Final Report (AECOM) (April 2024) at Page 71. This constitutes Appendix A to the submission draft Plan, and it may be necessary to add an Addendum note to that Appendix. If that is the case, the **Qualifying Body** may also wish to take account of the extensive comments and suggestions concerning the Design Guidance and Codes report made at Pages 7-10 of the District Council's Regulation 16 representations on the draft Plan).

**Question 2: Re. Appendix B – Non-Designated Heritage Assets (Pages 71-76)**

Policy L6 (Part A) in the draft Plan proposes the designation of six buildings and structures as Non-Designated Heritage Assets (NDHA), details of which are set out at Appendix B.

The District Council has commented that *“It is the Council’s view that the text does not provide robust evidence why these should be considered NDHA”*.

On my initial assessment of the draft Plan, I do share the District Council’s view and I consider that rather more historical evidence is desirable. In particular, I would wish to know when the Pearson Railway Bridge was demolished, and whether there are any other extant remains of that railway line that are evident within the Parish, and also whether the two K6 telephone kiosks were in situ at their current locations before their purchase by the Parish Council in 2009.

I confirm that I shall visit each of the proposed NDHAs during the course of my site visit to the Plan area.

Can the **Qualifying Body** please provide me with a Note setting out any further historical evidence/justification that is available regarding the proposed NDHAs, and any additional draft text that can be added to the information presently set out at Pages 71-76 in the draft Plan, that I may consider as a potential modification to the draft Plan.

-----.