

# Examination of the Dover Local Plan

## Matters, Issue and Questions

response from John Townsend

### Matter 1 – Legal Compliance

Day 1, am+pm

Issue 1 – Duty to Cooperate

#### Q3

There is no evidence in GEB01 Appendix 3 of discussion with KCC on traffic on local roads around the areas where substantial housing development is planned other than in the immediate vicinity of some developments.

### Matter 2 – Housing Growth and Residential Windfall Development

Day 2, am+pm

Issues 2 & 3 – Settlement Hierarchy & Housing Distribution - Policy SP3

The device of “settlement hierarchy” appears to be a fig leaf for the policy of “put housing where we want (and not where we don’t)”: it enables settlements with vastly different levels of infrastructure to be grouped together and obscures the comparisons between those in different groups. When this is obviously insufficient camouflage (for Deal), another policy is invented: “high levels of windfall development” (ED3, p42), an odd planning consideration; note that this is not calculated for any other settlement.

I took ‘shops’ (permanent establishments primarily selling goods [not services] which can be taken away - so, e.g., grocers and pubs but not hairdressers or estate agents) as a basic proxy for infrastructure; this, although crude (‘shops’ counted via Google, mainly streetview) is a simple way of measuring, and comparing, the existing levels of infrastructure. The table below shows the proposed housing development in proportion to existing infrastructure (rounded to nearest integer).

## Comparison of Centres' proposed housing development per 'shop'

[District Centre, Rural Service Centres, Local Centres]

Settlement	Planned dwellings	'Shops'	Houses/'shops'
Deal, Walmer, Sholden	213	more than I can count!	very small
Sandwich	227	111 at least	2
St Margaret's-at-Cliffe	20	6 at least	3
Kingsdown	55	6	9
Eastry	95	9	11
Wingham	103	8	13
Shepherdswell	70	3.5*	20
Ash	196	8	24
Aylesham	649	18	36
Elvington, Eythorne	335	5	67

\* Fry's farm shop open half the week

If housing were to be developed in proportion to infrastructure, the numbers in the final column would be nearly equal. Clearly, they are not. These figures demonstrate the wide variations between Local Centres and, for most, their huge loading compared with the District Centre and one Rural Service Centre. They also shows the very considerable loading on Aylesham compared with those of Sandwich and the Deal area. **Proportionally, the least housing is planned for the areas with the most infrastructure.**

Policy SP3 states "Development in the rural areas will be of a scale that is consistent with the relevant settlement accessibility, infrastructure provision, level of services available, suitability of sites and environmental sensitivity." (my underlining). The implementation proposed is shown above not to be consistent with this, and so not justified.

### (Day 11, am)

Furthermore, in the interests of sustainability, housing should be planned closer to sites of employment, shopping and entertainment: the larger settlements (NPPF Section 2, especially paragraph 11a ("align growth and infrastructure")); this Plan totally disregards that.

## Issue 4 – Site Selection Methodology

### Q3

(a)

Consideration of increased traffic on local roads (and hence any infrastructure requirements or impediments) around the areas where substantial housing development is planned (other than in the immediate vicinity of the developments) is consciously postponed: the policy appears to be one of “kicking into the long grass”: e.g.

*ED7A* (my underlining) for Shepherdswell “Local Road Network: Assess mitigation requirements for wider area including cumulative site impacts. TA needed to inform detail”; for Eythorne & Elvington: “ Local Road Network: A review of the impact on the surrounding rural road network, and mitigation where necessary”.

Such TAs and reviews are to be “Developer funded through S106” (and possibly S278) so cannot be expected until after significant parts of the developments are completed, by which time the amount of money will have been fixed, with no idea of what the problems may be, and so no idea of the costs to fix them.

Similarly, for Eythorne/Elvington, see *SAP 28 g ii* and *SAP 29 d*.

This approach is contrary to the whole thrust of the *Guidance “Transport evidence bases in plan making and decision taking”*, which commences “It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan ...”.

(b)

Also, for Eythorne/Elvington, one “new small convenience shop” (*SAP 28 c*) is proposed, which would be the only additional shopping facility. This means that for 335 additional houses, in addition to journeys for work, there would be a considerable number of shopping trips to outside the settlement: given its hilly nature, it seems unlikely that people would want to use public transport (however much the Plan wishes, & hopes, that this would be provided) because this would mean carrying the shopping from bus stop to home.

## Matter 7 – Infrastructure and Transport

Day 11, am

### Issue 2 – Strategic Transport Infrastructure – Policy SP12

**Q5** How have the effects of development on the non-strategic (local) highway network been assessed as part of the plan-making process? There is no evidence of this being done: (see above: Matter 2, Issue 4, Q3 (a)). Where highway mitigation is required, where is this set out It is not and how will it be achieved? (see above: ibid)