

Examination of the Dover Local Plan

Hearing Statement submitted by Mark Norcliffe

Matter 2 : Housing Growth and Residential Windfall Development

Issue 2 : Settlement Hierarchy - Policy SP3

The Inspectors have rightly asked questions about the accuracy of the information gathering and the robustness of the methodology used in the determination of the Rural Settlement Hierarchy. The same issues have been raised by local residents and representative bodies since the inception of the consultation exercises, but serious doubts remain about the validity of the whole process.

The Rural Settlement Hierarchy Study cites the Council's Monitoring Report of 2018/2019 as the main source of their data, and it is claimed that Parish Council input has been relied upon for any up-dates and corrections. It is not clear when, or how, this input was sought, but it was presumably in the period 2019 to early 2021. However, over that time-span, there is no record in the minutes that Shepherdswell Parish Council (my village) ever considered, or took any decision on, this issue. This omission must throw doubt on the thoroughness of any consultation and the accuracy of any information that it elicited. It is a matter of record that the Parish Council, in their response to the Regulation 18 consultation process, took strong exception to the way that Shepherdswell had been scored.

The methodology for allocating points to different local services and the thresholds for establishing each settlement category remains unexplained, and questionable. In the apparent absence of any guidelines on a national system, it seems that different councils have decided their own scoring methods. Thus, the adjoining districts of Dover and Canterbury have followed completely different principles, which, inevitably, leads to grotesque anomalies. For example, Shepherdswell, which lies in Dover district, has been "awarded" three points because it has a railway station. A few stops up the same line, the villages of Adisham and Bekesbourne, which come under Canterbury, are given no points for possessing the same facility. How this aligns with the "duty to co-operate" placed on adjoining councils is difficult to comprehend.

As a result of the Regulations 18 and 19 consultations, some changes have been made to the settlement hierarchy scoring system. But this has been

throughout an opaque process, with little or no feedback to respondents, and numerous anomalies unaddressed. In the case of Shepherdswell, the pop-up Post Office, which opens for a couple hours twice a week, has been accorded the same three-point score as permanent establishments in other locations, and a further two points are awarded for “other community facilities”, which remain unidentified.

Whilst recording the “advantages” of different communities, there is also a complete failure to take into account any deficiencies or detrimental factors. This leads inevitably to unbalanced judgements. For my own community, the lack of an adequate road infrastructure, the fact that no dining facilities are available in the evening, and the lack of local employment opportunities are three examples of negatives which need to be taken into consideration.

In summary, the settlement hierarchy, and its scoring system, is fundamental to DDC’s decisions about where they wish to locate additional rural housing. But the multiple failures in both the accuracy and methodology of their calculations – cited above - call into question the soundness of their whole decision-making process.

Issue 3 : Housing Distribution - Policy SP3

An alternative method of assessing the validity of rural housing allocations is to compare the number of proposed new homes with the size of the existing infrastructure to support them. Indeed, Policy SP3 specifically states that “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).

Research conducted by local residents has produced the following table which compares proposed allocations of housing with the permanent establishments selling goods (not services) which are available to support them :

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 | Too many to | very small |

| | | count easily | |
|-------------------------|-----|--------------|----|
| 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 show 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, and employment / leisure opportunities.** This is inconsistent with Policy SP3, and therefore not justified.

Issue 4 : Site Selection Methodology

The Inspectors have rightly raised a number of questions about the key issue of site selection. The importance of matching selection to the existing infrastructure is stressed by *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 ...". It is also referenced at various points in the draft Local Plan for example :

- SP12 : transport infrastructure should "support the needs of new and existing communities"
- SP11 : "supporting infrastructure should be provided in advance of, or alongside, the development (my underlining)

- H2 : it should be “demonstrated that traffic.....can be safely accommodated on the local road network”

But, in reality, the draft Plan offers no concrete plans for the improvements and mitigation within the rural road network. Any traffic assessments or surveys are postponed until an indeterminate future date, when they might be funded by developers through S106 money. In that scenario, the work cannot be expected to be undertaken until significant parts of the developments are completed, by which time the amount of money will have been fixed, with no idea what the problems may be or what it will cost to fix them.

Such a strategy of kicking the can down the road, and hoping for the best, is clearly unsound, and also wholly unworthy of a Plan that is supposed to drive the district’s growth and potential prosperity for the next two decades.