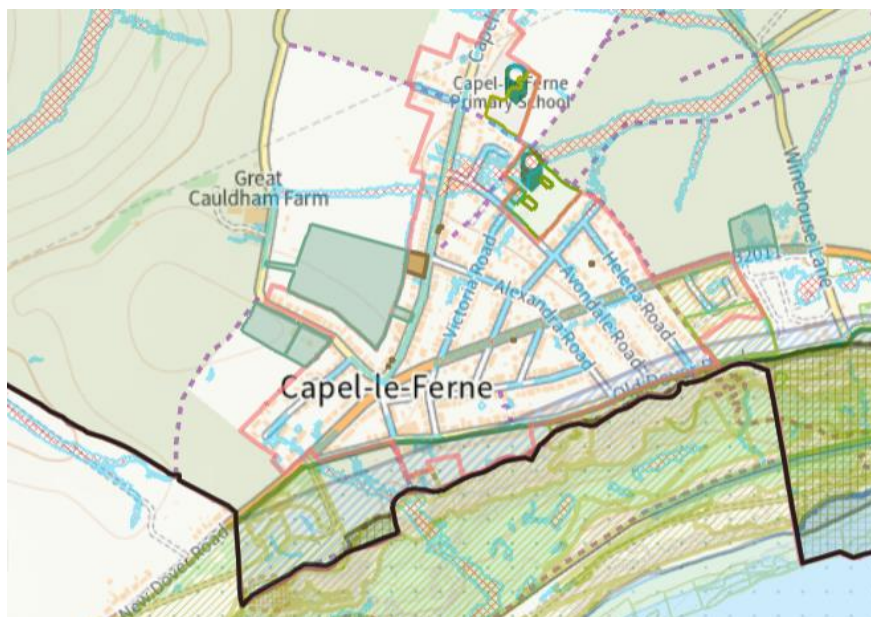


DOVER LOCAL PLAN – HEARING STATEMENT

SAP44

Further to our original submission under Section 19, we would like to add the following statement to reflect the changes/events since the submission.

The number of dwellings now being allocated to SAP 44 has been increased from 50 to 70. The proposed development area, along with SAP45, will increase the size of the village footprint by approximately 15% and will cover a substantial area of land in Capel-le-Ferne, in effect shifting the centre of the village to the west, closer to the AONB bounding the western side of the village. For the village of Capel-le-Ferne, the proposed developments SAP44 and SAP45 will represent large development rather than the ‘small housing sites’ being considered.



The upward slope of the SAP44 site, from the lowest point of the village to the highest point will mean that the new development will have a huge impact on the view of Capel-le-Ferne from the surrounding AONB. Due to the slope of the land, no amount of tree planting will be able to screen the development from the AONB.

We believe that there has been insufficient consultation with statutory consultees. The impact of the development of each site (SAP44 and SAP45 (previously CAP009 and CAP013) and the 34 dwelling development on Capel Street recently granted planning permission) is being assessed individually rather than cumulatively.

There is no overview within the Infrastructure Delivery Plan (IDP). Looking at document ED7, the revised IDP, there is no mention of Capel-le-Ferne, with the exception of a small reference to SAP44 and SAP45 in Table 7 of ED7A indicating that any undetailed, uncosted road improvements will be delivered by the developer and KCC. The design and traffic management of the junction of the Dover Road, Capel Street and Cauldham Lane is of particular concern as access and egress to SAP44, SAP45 and the site on Capel Street already granted planning permission all use this junction, already noted as a hazardous junction. We see no evidence of a proposal for an area wide traffic assessment to be carried out.

Any consultation with statutory authorities during the site allocation process, be it power, water supplies, drainage or transport review/traffic modelling is limited to each site individually and does not take into account the cumulative effect of all the proposed developments in the village. In most cases a standard consultation response seems to have been received suggesting that decisions on improvements to the overall infrastructure will be considered on a case by case basis.

By taking this site by site approach, with no overall view, there is no 'Plan' with provision for future development. The end result will be that some developments may be given planning approval but not be deliverable in a timely manner or even possible to achieve due to constraints outside the boundaries of the sites. It will also lead to protracted negotiations between developers and statutory authorities as to the feasibility and costs for each development.

This problem will be compounded as Dover District Council appears to be granting planning permission on these sites even before the Local Plan has been approved by The Planning Inspectorate.

An example of this is that planning permission has been recommended for approval for CAP013 (Ref DOV/23/00401)

It is interesting to note:

- The application is for 16 dwellings, despite the Draft Local Plan as amended by Councillors is only for 5 dwellings. DDC officers stated that the increase in units is due to developer demand as without it, the proposed site would not be economically viable. This argument was used to increase the number of units in the application for the adjoining CAP009 from 10 to 15 units and there is no reason to suppose that it will not be used in any application for SAP44 where the original proposal was for 100 dwellings. Cumulatively, CAP009 and CAP013 will double the number of dwellings in Cauldham Lane
- Suitable road and pedestrian access to CAP013 is dependent on the development at CAP009 being constructed with associated road improvements completed. However, there is no guarantee that the development at CAP009 will go ahead.
- The only traffic analysis carried out relates solely to CAP013 and does not consider the impact of traffic from CA009 and SAP44, which all agree will be substantial.
- The Committee Report for the Planning Application states

2.1 Policy CP6 of the Core Strategy emphasises that development that generates demand for infrastructure will only be permitted if the necessary infrastructure to support it is either already in place, or there is a reliable mechanism to ensure that it will be provided at the time it is needed. Draft Local Plan Policy SP11 retains this approach, to ensure infrastructure is delivered at the right time in the right place to meet the growing needs of the district.

It seems to us that Planning Permission is being granted ignoring the full detail and intent of Planning Policy

Having reviewed the revised documentation for the new Dover Local Plan, it would appear to us that Capel-le-Ferne is being treated as an easy target for development as it has no Neighbourhood Plan and proposed development in the village is now being driven solely by developer and local land owner demand rather than the needs of the village and Dover District Council