

Examination of the Dover Local Plan

Hearing Statement submitted by Mark Norcliffe

Matter 3 : Housing Allocations

Issue 5 : Eastry and Shepherdswell Housing Sites

Policy SAP36 : Land north and east of St Andrew's Gardens, Shepherdswell

Questions 1) and 3) posed by the Inspectors encapsulate key issues in determining whether housing development on this site is practicable, and this submission will focus on these matters. I will also briefly mention other considerations which may make building on the site unrealistic, and I would wish that my comments be read alongside the more detailed arguments that I have already presented as part of the Regulation 19 consultation process.

Question 3) asks whether the allocation as a whole is deliverable. The answer appears to be "no". The projected site is split between two independent landowners, both working with separate developers, and both having different plans and designs for any houses eventually constructed. There seems to be little common ground between them.

It is notable that, in both their original plans and their most recently submitted amendments, the owner of the south-eastern part of the plot (i.e. the land adjoining Mill Lane) offers no through access to the larger part of the proposed development site.

Faced with this situation, the answer to Question 1) becomes that the **only** access to the larger portion of the site is via St Andrew's Gardens. This is clearly not "safe and suitable", since approximately 100 dwellings would be dependent on a single access road – a direct violation of KCC policy on emergency and secondary access.

In this context, there are two other factors worthy of note. Firstly, in rejecting a previous planning application, the DoE inspector wrote that "the layout of St Andrew's Gardens is too constricted and too tortuous to provide free and safe access to any considerable number of dwellings." Nothing has changed since that comment was made. Secondly, it has become clear that the actual carriageway within St Andrew's Gardens was constructed to a very basic standard. As a result, the tarmac surface is noticeably pitted and pot-holed and in need of substantial repair. It is inadequate for current

levels of usage, and would not be capable of supporting a doubling of traffic volumes, nor, indeed, the passage of the heavy machinery that would inevitably be part of any construction project.

Question 1) also queries how the effects on the highways network have been considered. Whether directly, or through St Andrew's Gardens, any access to the site must connect to Mill Lane. Mill Lane itself, at its north-eastern end, is a single-track lane, whilst, at its south-western extremity, it connects with the narrow and congested Church Hill and the small back-road from Coldred. It is, therefore, impossible to access the proposed development site other than by single-lane constricted roads that are inadequate for existing levels of traffic. An on-site survey, conducted in November 2022, suggested that, based on current volumes, the proposed development would, at peak times, pump an extra 250 vehicles into this patch of inadequate transport infrastructure.

Problems with the local transport infrastructure extend beyond the immediate vicinity of the SAP36 site, and I will comment on these in my submissions on **Matter 3, Issue 6, Policy SAP28**, and on **Matter 7, Transport Infrastructure**. However, the general approach throughout the draft Local Plan seems to be to ignore such problems when they are raised, and indefinitely to postpone any consideration of resolution or mitigation.

I also wish to highlight that, beyond the questions posed by the Inspectors, there are other factors which cast doubt on the practicality of site SAP36 for housing development. These include :

- Engineering concerns regarding the proposed access to the lower western part of development. KCC's Kent design stipulates that access should have "a maximum longitudinal gradient of 6 – 7%, with a maximum gradient of 10%." Local calculations suggest that the gradient would exceed 15%, which it would be impossible to mitigate due to the local topography.
- Archaeological concerns as the site lies in an area generally rich in historical remains. The senior KCC Archaeological Officer has already expressed his opinion that any planning application should not be determined "until the applicant has provided further information in the form of a field evaluation and trial trenching."
- Ecological concerns, as local residents have reported the presence of over 15 forms of wildlife (including bats, badgers and slow worms). A comprehensive, independent ecological survey should be necessary before the site can be considered for housing development

In summary, there are many strong reasons for site SAP36 being deemed impracticable for housing development, and it should therefore be removed from the Housing Allocations in the Local Plan. The size of the any proposed development (approximately 50 houses) would have a major effect on the local area and infrastructure, but make a minimal contribution (less than 0.5%) to Dover district's overall projected housing needs.