

Examination of the Dover Local Plan
Hearing Statement submitted by Mark Norcliffe

Matter 7 : Infrastructure and Transport
Issue 2 : Strategic Transport Infrastructure –
Policy SP12
and
Matter 3 : Housing Allocations
Issue 6 : Eythorne and Elvington and Wingham
Housing Sites : Policy SAP28/29 – Land between
Eythorne and Elvington

The draft Local Plan anticipates that 76% of new housing stock will be built on greenfield sites. It also specifically states (Policy SP3 – Housing Growth) that “development in the rural areas will be of a scale that is consistent with the relevant settlement’s accessibility” and that “development that would result in disproportionate growth to any of the District’s settlements, which cannot be supported by the necessary infrastructure.....will be resisted.”

Against this background, the Plan might be expected to give considerable emphasis and detail to how the rural transport infrastructure might be improved to handle the current, and expected increase in, demand. But, on this key subject, the draft Plan is largely silent, and extremely vague. The many issues and contradictions that have been identified in the consultation process, and previously, are either ignored or kicked down the road for future assessment and possible mitigation.

Surely, in a Plan that is intended to serve the District for many years to come, the first necessity is to put the right infrastructure in place. Once this is done, the developments – be they residential, commercial or recreational – can follow, with far less disruption, cost, and public resentment. If it is not possible to provide suitable transport (and other) infrastructure for a particular location, that site should be removed from any development plans.

The lack of attention to known deficiencies in the rural transport network and the failure within the draft Local Plan to offer any practical solutions or mitigations are clearly demonstrated by the proposal (Policy SAP28/29) for 350 new houses in Eythorne/Elvington and the proposal (Policy SAP36) for 50 dwellings in Shepherdswell.

The only route that can connect both these sites to the primary road network is the lane running from the A2, just west of the Lydden junction, through the villages of Shepherdwell and Eythorne to the A256, south of Tilmanstone, and known variously along its course as Coxhill / Eythorne Road / Shepherdwell Road / Wigmore Lane / Barville Road. This road is itself a minor route – narrow, frequently tortuous, beset by poor sight lines, and, in many places, unable to accommodate two lines of traffic at the same time. It is deemed unsuitable for heavy goods vehicles. The route is already over-used and heavily congested, with daily instances of traffic queuing at the various bottlenecks, and the occasional “confrontation.” The local topography – much of the road lies below the levels of the surrounding land – and the proximity of existing dwellings to the road’s edge excludes any possibility of a significant up-grade.

However, the draft Local Plan chooses to ignore this intractable issue, suggesting blandly that “a review of the impact on the surrounding rural road network” should be undertaken as part of any planning application. Surely, any review should be conducted **before** the sites are accepted for possible development.

The inspectors clearly have concerns over how impacts on the rural highways network have been assessed (see, for example, Issue 2, question 5). I would recommend that, during their time in Dover, they make a site visit to this particular route, in peak hours, so that they can see the problems that already exist, the potential for increased overload from new housing developments, and the lack of options available to mitigate these significant difficulties.