

Public consultation on Dover District's draft (Reg 18) new Local Plan (deadline 17/3/2021)

Submission from Dover and Deal Green Party

The tenor of the **Chapter 4 Vision and objectives** section appears promising. But the more we examine it, the more we listen to members of the public and civil society groups who have scrutinised it, the more we compare it to national guidelines on what to look for in a climate-friendly Local Plan; the more it disappoints.

We have a number of recommendations which would cause the Development Management (DM Policies) in subsequent sections to match the promises in Chapter 4 and make them **meaningful**, faced as we are by a triple crisis, of pandemic impoverishment, climate crisis and the 6th mass extinction as referred to by Sir David Attenborough, and so many others. Our recommendations are based on work being done by other Local Planning Authorities, new levels of public scrutiny (e.g. in the 'Permission Accomplished' 2020 Transparency Intl UK report on LPAs, planning and volume developers' relationships) and advice from many local and / or professional experts, all of whom we thank most sincerely.

In terms of the Reg 18 consultation process, which was decided before Christmas 2020 was curtailed, before the 3rd covid lockdown was announced on 4th Jan 2021, we and many members of the public are aware that 7 of the 8 weeks of the consultation were under lockdown and members of public with reduced internet access (be they due to disability, lack of skills, lack of funds or lack of broadband) will have had little chance to engage with the process. The on-line Q + A sessions were useful up to a point, it would have been nice if the use of language had shown that the planning department's regard for its developer partners, was matched with a regard for the residents to whom democratic local planning authorities LPAs are accountable. It is unfortunate to say the least that the participation in the nLP process of community representatives, such as Dover Forum KALC, the Dover Society and The Deal Society was dispensed with in the year preceding the Reg 18 consultation.

Chapter 4 item 3.11 We note that the words used by the 'Planning, Regeneration and Development' department refer to 'a strategy and action plan with an aspiration that the Council will become a net zero carbon emitter by 2030' are weaker than those minuted 29 Jan 2020, when Cllr Barlett (leader) moved, and Cllr Mills (leader of opposition) seconded the declaration of a Climate Emergency, declaring council would produce 'a Climate Change Strategy with the intention of the Council becoming a net zero carbon emitter by 2030 at the latest.' (item 52). We recommend that DDC Planning, Regeneration and Development department respect the words of the minuted democratic decision, instead of watering it down. (We would also meekly point out that our Green team initiated 3 climate emergency declarations for local councils to become genuine net zero carbon 2025 in June and July 2019 (Deal 25 June, Walmer 3 July, Dover 17 July) when we won 11 seats on DealTC, Walmer PC, DoverTC and Ringwould with KingsdownPC).

Item 3.5 We note that internal migrants to Dover are likely to be middle-aged and older, and will probably require (as the local aging population does), small bungalows rather than executive 4 bedroomed homes, for people driven out of Greater London by the corruption of the London property market (report 2018 Transparency Intl UK, Faulty Towers).

Item 3.17 We note that there was a gross imbalance 2010 – 2019 with lower housing growth where it is urgently needed in Dover (29%) and overdevelopment on Greenfield around Deal/Walmer urban area (31%) and Aylesham. There is concern that Deal / Walmer have seen 2019 – 2021 more planning permissions granted at a pace which is causing serious public concern about the ensuing serious congestion and drainage problems.

Item 3.25 We suggest that there is also a considerable extent of hidden un / under / precarious employment in Dover. Three wards in Dover town area are in the 10% of most deprived wards in the country.

Item 3.27. We note that Dover became a net exporter of labour 10 years ago and residents commute to Canterbury, Folkestone, Ashford and London. This has implications, and we recommend, a) that Planning + Regeneration + Development officers work rapidly to understand the local employment opportunities on rural farms and woodland within the district that are presented by the need for local food security, and agro-forestry. We provide more detailed recommendations in our comments on Chap 7 and the DDC Growth strategy. Green New Deal job strategies (originating in UK report in 2008), are being taken up in the USA at scale, at pace, in 2021. We also recommend, b) that where labour has not shifted to home-working in the post-covid context, clean commuter options are delivered speedily, (details in response to Chap 9).

Item 3.31 and 3.32. The expected declarations of praise for, and promises to protect, the district's natural environment are entirely appropriate. Its beauty and diversity underpin both our tourism economy and the wellbeing of 117,000 residents, AND food production is also dependent on biodiversity. There are missed opportunities to join up the dots linking Chap 5 and Chap 7 and Chap 11, and show a genuine understanding of how our existing natural capital is an essential and invaluable component without which it will be impossible to meet the climate change mitigation targets that we **must** meet if our children are not soon to live in deprivation and danger. (especially in a district whose 70% rural economy is well-placed to meet the needs of the post-brexite, climate emergency, post-covid world).

Chapter 4 – Spectacular and Sustainable Environment

To clarify: Mitigation of Climate change means taking action so that the level of climate change is less than it could become. Adaptation to climate change is different, it means taking action so that the expected problems of climate change can be better coped with.

Bullet point 1 would make more sense if it were reworded thus,

*To respond to the climate change emergency through both **mitigation**, ensuring natural carbon sequestration assets are retained, ensuring the reduction of carbon emissions from existing housing, and minimising carbon emissions from new development; and also through **adaptation**, designing and regulating new developments to ensure they are resilient to extreme weather events and climate change.*

2nd, 3, 4th 5th bullet points we commend.

6th bullet point should be amended thus, *to ensure the depleted natural resources of the District are restored, that waste is minimised and environmental pollution is stopped.*

The Spectacular and Sustainable Environment should be the first of the 4 aspects of the Vision, followed by Vibrant Communities, then Thriving Places and finally a Prosperous Economy, as a prosperous economy can only be delivered with the other elements in place (para 4.1).

Chapter 5 Climate Change

The draft Local Plan lists as key climate change issues, a) reducing carbon emissions, b) sustainable design and construction, c) renewable and low carbon energy, d) sustainable transport, e) water resources, flood risk and coastal change, f) carbon sequestration. We comment on how these fleeting promises in chapter 5 can be made meaningful below in specific chapter sections, in chap 6 and 7 and 11, are recommendations on a), b) e) and f) ; in chap 9 are recommendations on c) and d).

We note that with the announcement, March 2021 that 'the Gulf stream is being slowed to a tipping point', there is a need to expect both more extreme winters and more extreme summers. So item 5.9 needs to include both passive cooling in summer and passive warming in winter.

5.34 Change to *The natural capital wealth of the district must not be thrown away because of unintended negative impacts of the cheap and cheerful land clearance practices of volume developers, and their sub-contractors. Existing trees and hedgerows which are capturing carbon in this decade 2020-2030 and the next 2030 -2040 must be protected. Vague promises 'to facilitate tree planting and protection where possible' are a very inadequate response, because replacing **existing** trees with trees that will only start their carbon capture career in 2040 will not increase our carbon sequestration capacity or allow the UK or Kent to meet its climate change targets.*

SP 1 Planning for Climate Change.

Mitigation – bullet points to be changed;

1st ; Change 'promoting' to 'requiring' low carbon design,

5th ; Change 'Maximising' to 'retaining and maximising',

Add 7th ; 'incentivising the reduction of carbon emissions from existing housing' (because otherwise promise in Chap 3 will be unfulfilled.)

DM Policy 1 Reducing Carbon Emissions.

We note the list of councils building zero carbon homes includes; Exeter City Council, (200 finished, 1000 on the way), Leeds (1000 nearing completion), Norwich (100 finished), York, Wales (1400), Oxford (40), Enfield, Meridian Water development (10,000 homes). <https://www.theguardian.com/artanddesign/2021/mar/06/eco-homes-become-hot-property-in-uks-zero-carbon-paradigm-shift> So the draft wording of DDC nLPwe find very weak.

We recommend this (closely based on ReadingBC Local Plan Adopted 2019). *'Given the scale of residential development in Dover up to 2040, achieving the aims of the Climate Change Strategy will not be possible without that development having a minimal impact on carbon emissions. Therefore, the requirement will be that major new housing is built to **zero carbon homes standard**. A revised Sustainable Design and Construction SPD to be produced in 20xx will contain more detail on achieving this requirement, but in general, where homes are not designed to be carbon neutral, this will mean as a minimum a 35% improvement in the dwelling emission rate over the 2013 Building Regulations plus a contribution of £1,800 per tonne towards carbon offsetting within Dover (calculated as £60 per tonne over a 30 year period). Where it is proposed to meet the zero carbon homes requirement in another way, clear evidence should be provided to demonstrate how it will be achieved at planning application stage. Zero carbon homes is an achievable standard that, until recently, was intended to be a national requirement in the Building Regulations.*

And Non domestic buildings: Change 'BREEAM very good' to 'BREEAM excellent'.

DM Policy 2 Sustainable Design and construction.

Add *'Given the low cost of initial installation of rainwater harvesting, and the high cost of installation **after** homes are built, permission will be granted only if designs include the installation of rainwater harvesting (and greywater recycling).*

DM Policy 3 Renewable and low carbon energy – change to *'Developments of renewable and low carbon energy will be supported **and encouraged** . . . e) impacts on heritage assets and landscape setting have been minimised, f) there is no significant impact on wildlife habitats, biodiversity (particularly protected species).'*

DM Policy 4 Sustainable Travel. 4 (c) could be strengthened to read: *"Be readily accessible by sustainable transport modes through the provision of high-quality, **engineered**, safe and direct walking and cycling routes within the permeable site layout.."* This would make clear that cycle ways, for example, should be more than a painted line on the road surface. Also to be improved by the following final statement: *"The Council will safeguard **and enhance** the rights of way network and other cycle and walking routes from developments that would **otherwise** compromise their use."*

DM Policy 5 Water Efficiency. We recommend adding *'the installation of rainwater harvesting systems is required on new build housing'*

DM Policy 6 Flood risk.

Add : Wetter winters are a feature of climate change, as are rising sea levels so more of the district (inland and on the coast) is likely to be at risk of flooding. Undeveloped valley bottoms within 3 miles of urban settlements should be left undeveloped both as a means of allowing natural means of flood prevention, and to prevent new homes from being flooded.

DM Policy 7 Surface water management. We commend.

DM Policy 8 Coastal Change Management. We commend.

DM Policy 9 **Tree planting and protection**. We recommend that the points made in 5.64, 5.65, 5.66 become part of this DM 9 Tree Protection and replacement. Add *'Existing trees which are capturing carbon in this decade 2020-2030 and the next 2030 -2040, must be protected. DDC will accelerate the rate of making Tree Preservation Orders and Woodland Preservation Orders and provide appropriate staffing and resources to sustainably and effectively deliver this policy, honest, independent evidence from an arboriculturalist will be required if felling is requested on grounds of tree disease. Vague promises 'to facilitate tree planting and protection where possible' are a very inadequate response, because replacing existing trees with trees that will only start their carbon capture career in 2040 will not allow the UK or Kent to meet its climate change targets.*

Moreover this addition is essential, 'For every 10,000m2 of new housing (roughly 50 dwellings of 200m2 per dwelling) of housing, one open space of 150m2 and another woodland area of 150m2 should be provided, these allocations to be non-transferable between 10,000m2 sections. Moreover development should only be permitted if 90% of existing trees are retained (This will account for the woodland areas referred to above, and will provide pockets of green infrastructure of amenity value to new residents at very little cost and inconvenience to the developer).

Chapter 6 New Homes

The Vibrant Communities statement in 3, "a supply of new homes that meets people's needs and where affordable and local housing is prioritised", does not seem to accord with much of the strategic policies 4, 5, 6, 7 and specifically it does not apply to the proposal to build houses over the catchment area of the aquifer to the south of Deal (DEA020), or a number of similar proposals, or with the scale of internal migration into the area as shown in Chapter 3 (Figs 3.2 and 3.3).

We reject item 6.50 entirely.

Strategic Policy 2 Housing Growth - We note that a bullying central government in London is imposing a disproportionate amount of housing growth on Kent and the SE, that the supposed national new homes ombudsman, is not neutral in this matter and gets on well with volume developers and there is with a grievous lack of democratic accountability across Kent, and so the chances of protecting Kent, the garden of England, and of achieving a Growth Strategy that creates climate-friendly jobs and suitably-sized, suitably-priced zero-carbon homes for the next generation of local families are not good. The space available for infrastructure, functions well for a compact coastal towns of the size that Deal / Walmer + Sandwich was 3 years ago. The level of greenfield overdevelopment is putting Deal infrastructure under strain now, so in-fill should make up the majority of the allocations for Deal and that the housing growth specified for District Centre of Deal and around its boundaries needs to be radically reduced.

Item 6.88 and its passing reference to settlement boundaries which will be reviewed some time soon, is something many of our correspondents are very concerned about. We recommend changing to *'Previously existing settlement boundaries will be respected, until such time as town and parish councils may have agreed changes with Dover District Council, in accordance with the principles of localism.'*

Strategic Policy 3 Residential Windfall Development

Provision of affordable housing, item 6.50. We believe it is entirely unacceptable for DDC dept of PRD to say **'for Dover urban area there will be no affordable housing to be provided' because of our LP whole viability study.** We note that <https://www.labcwarranty.co.uk/media/2694/land-development-report.pdf> shows that return on investment for developers in Kent is running at 29.34% . The vast majority of the public in Dover district (whether they are among the 35% of the electorate who are engaged enough currently in the work of councils to vote or not), are keen for Dover urban area to get the warm, healthy, affordable homes that it is crying out for. They do not want to see desirable Deal/ Walmer urban area become so congested that its desirability disappears.

We therefore want to see an amendment in **Strategic Policy 3 Residential Windfall Development** as follows:
In the case of planning applications on developments of over 8 dwellings on windfall development sites, within 3 miles of the boundaries of Deal / Walmer, permission will only be given if the developer applicant has previously undertaken a development of a similar scale within Dover Urban area which provides a minimum of 30% affordable housing.

On Strategic Policy 4 Whitfield Urban Expansion : We note that the details will appear separately as a Supplementary Planning Document, but that a commitment is made to provide the new neighbourhood with transport (We recommend 'transport' should mean cheap affordable electric buses) education, primary health and social care, utility services and green infrastructure, with retail, leisure and employment venues.
We want an amendment specifying how much green infrastructure; namely an amendment stating that *for every 10,000m2 (roughly 50 dwellings of 200m2 per dwelling) of housing, one open space of 150m2 and another woodland area of 150m2 should be provided, these allocations to be non-transferable between 10,000m2 sections. Moreover development should only be permitted if 90% of existing trees are retained (These retained trees will account for the woodland areas referred to above, and will provide pockets of green infrastructure of amenity value to new residents at little cost or inconvenience to the developer) and new trees planted and tended with a guarantee to ensure survival 4 years after development completed.*

The same to apply to North and South Aylesham (Strategy Policies 5 + 6) and to Eythorne and Elvington Local Centre (Strategic Policy 7).

On Site Allocations Policy 1 non-strategic housing allocations

Key considerations. In all instances where it says *existing trees should be retained where possible*, this must be changed to *90 - 100% of existing trees must be retained*

The following sites we believe are the most threatening to local ways of life and are unsustainable in terms of commitments to climate and ecological emergency and should be omitted from the list; ASH10, DEA008, DEA020, DOV012, KIN002, LYD003, NOR005 rare open mosaic habitat, RIN004 (traffic lights + pedestrian crossing needed on A258) SHO002 +004, WAL002

Gypsy and Traveller Site Allocations – Site Allocation policy 2 Alkham Valley. We commend.

DM Policy 10 Gypsy and Traveller site intensification. We support this policy

DM Policy 11 Type and Mix of Housing – Affordable Housing 6.12 As stated above on Strategic Policy 3, we are entirely opposed to the strategy of Dover Urban Area nil provision of affordable housing. We therefore want to see an amendment in Strategic Policy 3 Residential Windfall Development as follows *In the case of planning applications on developments of over 8 dwellings on windfall development sites, within 3 miles of the outer boundaries of Deal /*

Walmer, permission will only be given if the developer applicant has previously undertaken a development of a similar scale within Dover Urban area which provides a minimum of 30% affordable housing.

DM Policy 12 Affordable housing. Sentence *'This with the exception of Dover Urban Area . . .'* to be taken out.

DM Policy 13 Rural local Housing Needs. Addition needed. *'The work of Kent Community Housing Hub which provides a genuine alternative to developer-led housing schemes designed for high profit, will be brought to the attention of all of the District's parish and town councils, as will the initiative of Shepherdswell and Coldred Community Land Trust'.*

DM Policy 14 Gypsy and Traveller Windfall Accommodation. No objection

DM Policy 15 Self Build and Custom House Building. We welcome.

DM Policy 16 Residential extensions and annexes. Add *There should always be thorough and meaningful consultation with local residents.*

DM Policy 17 Houses in Multiple Occupation. No comment.

Chapter 7 Employment and the Local Economy

Future Economic Strategy.

There appears to be no intention of using the Local Plan to improve educational attainment by, for example, specific policies to a) forge deeper links with FE institutions (such as the laudable, forward-looking Dover Technical College) given the skills gap relating to the Green Homes agenda, b) encourage higher education establishments to develop facilities in the district, and thereby to develop a knowledge based economy beyond the former Pfizer's site. And c) encourage the long-promised incubation hubs for the newly qualified in the district, have fallen victim to central gov't's stop/start sound-byte culture, these a, b, c, should be a requirement. This would contribute to raising the average level of earnings in the district and to combating the high levels of deprivation experienced in some wards.

A glaring omission relates to new economic opportunities created by climate-friendly recovery sectors. Three in particular are essential in Dover District. With a 70% rural economy, which is severely challenged by Brexit and climate problems including water shortage, our agricultural advisor tells us that diversification into agri-forestry could become popular among the farming community. It is recommended by Nature-Friendly Farming Network and featured on BBC Countryfile 28/2/21. Examples include a) protecting arable yields in cases of drought, by planted strips of suitable, native, drought-tolerant trees, (which counter soil erosion, while increasing carbon sequestration) and, b) bringing back to life existing but neglected, traditionally coppiced woodland, causing it to be harvested for biomass on a rotational basis. Similarly, short rotation forestry would create rural income and mitigate climate change. Another key to meeting climate targets is increasing the amount of land used for growing food for people rather than livestock. This would create new outdoor jobs as would replacing imported market-gardened food, (on which red-tape has increased) with locally grown fruit, vegetables and pulses, this is a growth sector too. **So rural areas, fields and woodland should be valued as locations of employment in themselves.**

The second sector is the up-grading of all rented housing stock (both public and private sector) to **zero homes** standard, so that it doesn't need to be done again before the target of 2040 /2050. It will be necessary to ensure that publicly owned rented housing stock stays in public hands. To incentivise private landlords, DDC should set up a register of private landlords, and to qualify for registration, landlords should have to show that homes rented are EPC C in 2022, EPC B in 2023, EPC A in 2024 and zero carbon in 2025. As this will push up the value of their property, landlords should not find it difficult to access cheap loans to carry out the retrofit and the council may be able to suggest sources of finance. Tenants will benefit in terms of heating costs saved and improved standards of health,

which is also a saving to the public purse. The economy will benefit in terms of jobs created for local trades people. Although the Green Homes Grants scheme of central govt has caused problems among local retrofitting companies, creative schemes at the local level are well situated to get this urgent work underway, local municipal bonds are available as a means of pump-priming.

A third sector would include the fitting and maintenance of renewable energy installations, e.g. small-scale on-shore wind, small and medium scale solar (on domestic or non-residential roofs or to be combined with grazing land), micro-tidal (tidal currents we are advised are very suitable locally), or 'green gas' as pioneered by Ecotricity in Hampshire (as the grass-cuttings from Dover's many golf courses and campsites are likely to be suitable). To maintain the returns on investment in these sectors within the regional economy, and stop them being off-shored, a priority should be given to schemes which are 51% or more community-owned.

Strategic Policy 8 Economic Growth.

We recommend adding to the 2nd sentence so that it reads as follows; *A higher level of jobs growth will be planned for, and land will be allocated to fully meet the needs that are identified; a priority will be given to the creation of jobs in the climate-friendly recovery sectors with land allocations designated for various forms of agri-forestry, market gardening, and renewable energy projects.*

Strategic Policy 9 Employment Allocations

Needs the addition of *farming land in Dover district* because outdoor employment on the land as described above should be thought of as a place of employment.

DM Policy 19 Retention of existing Employment sites – To the list should be added the farming land and neglected coppicing sites and other sites of outdoor rural employment.

DM Policy 20 Loss or redevelopment of employment sites and premises

DM Policy 21 Home working. We recommend adding *'all large out-of-town developments should include of co-working spaces, (of interest to all parents who have had to work from home and home school during the pandemic), directly adjacent to car-club spaces and electric bike parking.*

DM Policy 22 Conversion or rebuild of rural buildings for Economic Dev. Purposes. This minor accommodation is welcome, allowing indoor office space. It has been cited by DDC officers when we ask about protecting the outdoor farmland and woodland as locations of employment; clearly office space and fields / woods serve different productive purposes.

DM Policy 23 New Employment premises in the countryside . See comment on DM policy 22

DM Policy 24 Tourism and Tourist / Visitor Accommodation *

The generalisations within this policy we commend, (See also opportunities for green tourist transport in Chapter 9) HOWEVER; Tourists have toilet needs. For a town with the iconic, historical importance of Dover NOT to have any coach park with lavatorial comfort facilities is a disgrace. The ratio of toilet block to inhabitant in Dover town is treble the ratio in other urban areas in the District, 1 : 10,000 or higher. The only coach park in Dover Town has, for 3 years, had 2 signs on Maison Dieu Road telling coach drivers and visiting cardrivers that a toilet exists when in fact it doesn't. At this location in Maison Dieu car park, behind the police station, visitors get out, pay to park and find nothing, merely a sign to a 15 minute walk to Pencester Gardens, difficult when legs are crossed. The DDC website misleads the public on this issue. The lack of toilets is a public health problem which we have referred to Kent Director of Public health. The stalemate between DoverTC and DDC on this lack of toilets has to be overcome by

installing a minimum of 3 modern self-cleaning toilet blocks, one at Maison Dieu, in 2021; in the interests of Dover residents, local visitors from around East Kent and tourists from further afield.

The cable car to the castle, and the cost to the public purse of both the feasibility study and the cable car itself are very unsustainable. It is unsustainable because the degree to which cruise ships will return to popularity post-covid has a question-mark over it and consequently the idea of wafting passengers from the cruise terminal to the castle so they don't have the inconvenience of pottering through Dover town is also an expensive shot in the dark. It would be much better to look at smaller zero-carbon transport activity projects within the town; harbour trips with zero carbon, solar-powered boats (like La Rochelle has had for 15 years), like electric hopper mini-buses (like the ones which have been coping with the 1 in 6 gradients of Aix-en-Provence for over 10 years).

Chapter 8 Retail and Town Centres

Dover Town Centre 8.32

All comments in DM Policy 24 Tourism and Tourist / Visitor Accommodation also apply here in Chapter 8 (acute lack of public toilets and services for coach tourists, unsustainability of cable car posturing, need for SMEs to provide zero carbon transport activities for visitors and day-trippers).

Addition: there is an especial need in Dover for a cheap indoor hub for small start-ups such as that provided by the Co-innovationCentre at Stembrook (ex Co-op). If these premises cannot be made available for existing and new start-ups after 2021, a new location where costs are as low as they have been at Co-innovation should be provided. Dover Market around Market Square must be maintained and new stalls encouraged. Dover town spatially has much potential, it has long been overdependent on disparate, charitable initiatives. There is an especial need to incentivise retail start-ups along London Road, Dover between the Charlton Centre and the Cadet centre.

Deal Town Centre 8.34 The relative success of Deal Town Centre is threatened by the congestion caused by over-development on the outskirts of Deal. With many developments still in the planning and building stage, this congestion should be anticipated from early 2023. Shoppers aged 50 – 90 will not want to sit in traffic queues to get to Deal Market on a Saturday, they will go elsewhere perhaps to Canterbury or to Thanet retail parks. Deal Town Council's report of June 2020 'Making Walking and cycling irresistible' is excellent, it provides details junction plans to make cycling safer and we fully endorse it. The plan for a 'Park and Pedal', scheme at Borrowpit Carpark Walmer is excellent. It would offer opportunities to SMEs to provide small electric hopper bus. This should be provided by a local CIC in preference to Stagecoach, who, experience shows, are disinclined to innovate in a timely fashion, and it could allow Deal town centre to retain footfall on the high street and cope with the developments which have already received planning permission, or are being built. The Deal / Walmer road system will not cope if permission is given for any more developments. DDC dept of Planning, Regeneration and Development are in danger of killing a Dealite goose laying golden eggs, if they don't put a brake on developments within 3 miles of the boundaries of Deal / Walmer.

Strategic Policy 10 Quantity and location of Retail Developments. No comment

Strategic Policy 11 Dover Town Centre. There is a need for pleasurable, retail-browsing experiences; which means cutting business rates for independent, innovative start-ups especially those allowing residents to reduce their carbon footprint (zero-waste / re-fill shops, cycle + skate repair stores, up-cycling stores, plant swap-shops, etc).

The Sunday farmers' market could be tempted back all year round e.g. car park behind Costa coffee, if it were offered space under a solar canopy under which shoppers could stroll round protected from the worst of the rain.

Walking / cycling / driving along London Road could become a much more cheering experience if offers to create murals along the road (from Dover Big Local, etc) were taken up. Underpinning the promotion of the town is the

urgent installation of public toilets. The stalemate between DoverTC and DDC has to be overcome by installing a minimum of 3 modern self-cleaning toilet blocks, one at Maison Dieu, in 2021; in the interests of Dover residents, local visitors from around East Kent.

Strategic Policy 12 Deal and Sandwich Town Centres.

Both of these compact centres would benefit from '20 is plenty' policies being introduced. Protect the retail streets that exist. A strong case exists for incentivising / cutting business rates for independent, innovative start-ups especially those allowing residents to reduce their carbon footprint (zero-waste / re-fill shops, cycle + skate repair stores, up-cycling stores, plant swap-shops, etc).

DM policy 25 Primary Shopping areas

DM policy 26 Sequential test and impact assessment

DM Policy 27 Local Centres

DM Policy 28 Shop Fronts

Chapter 9 Transport and Infrastructure

It is strange that this chapter doesn't have a specific SP on walking and cycling infrastructure, especially given that cycle routes 1, 2, 15, 16, and 17 run through the district. Chap 3 promises "enhanced network of dedicated walking and cycling routes". It would be good to see more evidence that this is seriously being addressed in this chapter 9, see suggestions for improvement of SP13 below. Bus services should be better integrated with the rail service timetables on the line running from Sandwich and Deal through Dover to Ashford, and the line running from Dover to Canterbury and Faversham and Victoria.

We note that despite the statement in SP 14 and DM 29 below about '**proposals generating levels and types of traffic movement resulting in severe cumulative residual impacts in terms of capacity and road safety will not be permitted**', DDC accepted the Dept For Transport's imposition by SDO of the Dover IBF using non-dualled A2 route used by many retail shoppers at White cliffs Business park, and thus has permitted exactly the problem described. The real-world constraints of the EK road system (A258, A2, A256) mean little can be done to ameliorate the situation, without long term road closures needed to dual the A2 from Jubilee Way to Lydden Hill, which will stop the flow of freight to IBF. But road improvements to separate local traffic from through freight traffic must be done to save lives; road improvements that central govt must pay for. The separation needed must include flyovers and underpasses.

It should be noted that Dover has too much experience of the gridlock and chaos caused by cross-channel delays, especially the community of Aycliffe, (and Guston may soon suffer similar blight). With more extreme weather events expected, and with 'frictionless freight flow' now a thing of the past, holding areas for freight OUTSIDE THIS DISTRICT, near the M25, are needed more now than they were before.

Given the mention in Chapter 3 of renewable and low carbon energy, it is strange that this infrastructure chapter doesn't have a Strategic Policy on this issue. Our team, which included 2 councillors elected to Dover Town council in 2019, have put the following suggestions forward at DoverTC; Port of Dover to be approached regarding more solar PV on their buildings and the installation of wind turbines on the harbour walls like the ports of Boulogne and Liverpool, Eurotunnel to be approached about wind turbines on the Samphire Hoe breakwaters, Network rail to be approached about solar PV on Dover priory station buildings, similarly for Stagecoach and the planned new bus station at York street. We also recommend high solar canopies over the marshalling yards of Port of Dover, to

generate energy that fridge trucks (whose engine-idling contaminates Dover) could plug into while waiting to board ferries.

Strategic Policy 13 Infrastructure and Developer contributions Paragraph 9.26 highlights the need for infrastructure, particularly transport infrastructure, and paragraphs 9.27 to 9.29 point out the difficulties of establishing what infrastructure is required to support each potential new development. Paragraph 9.30 concludes that infrastructure is best provided by Section 106 agreements rather than by a Community Infrastructure Levy (CIL). This underpins Strategic Policy 13 which concludes by stating that “In determining the nature and scale of any provision, the Council will have regard to viability considerations and site-specific circumstances.”

This statement, in effect and in practice, has allowed developers to reduce progressively the Section 106 payments and other conditions imposed on developments at the time of granting permission by suggesting that their potential developments are not financially viable once all the constraints have been factored in. A CIL would provide developers, planners and residents with the certainty of knowing what the community costs would be.

Comment

*It is not the Council's role to have regard to any planning application's financial viability. It is the responsibility of the applicant to have in place sufficient funding or access to sufficient funding in order to realise the project. It is the Council's responsibility to determine the use of the land and the conditions which make that use appropriate. Paragraph 9.30 should be re-written to signal the Council's intention to implement a CIL before the Plan has run a quarter of its projected course, and a further sentence should be added to SP13 stating that: **“The Council intends to introduce a Community Infrastructure Levy as soon as possible but before 2025 so that the council, developers and residents can more clearly understand the financial requirements of any agreed planning permission.”***

Furthermore, in relation to SP 13 a new section needs to be added to the effect that *the rail stations in the district are (HS1 Line Ashford – Ramsgate) Dover Priory, Martin Mill, Walmer, Deal, Sandwich, and (Dover – Canterbury East - Victoria line) Dover Priory, Kearsney, Shepherds Well, Snowdown, Aylesham. There is also a fast bus route No 12 Deal, Whitfield (south of A2, separated by A2 from Whitfield Urban Development), Canterbury. Enhancement of the network of walking and cycling routes promised in Chapter 3 will include installation of engineered, protected dutch style cycles paths, improvements of junctions in towns across the district especially near rail stations, and integration of cycle paths 1, 2, 15, 16 and 17 with all these 9 rail stations and 3 bus stations, and, trains and buses on these routes must carry (electric + cargo) bikes.*

Paragraphs 9.31 to 9.34 deal with the need to dual the A2 in order to provide additional highways capacity to and from the Port of Dover, while paragraph 9.34 deals with the High Speed rail line and the possibility of reducing travel times still further to London and, at the same time, improving rail capacity locally. These paragraphs introduce **Strategic Policy 14** which is very specific in that it considers only the improvement of the A2.

Strategic Policy 14 Highway Infrastructure. The Council's ‘commitment to work with HE on long term improvements to A2’ must be more than pious lip-service reiterated to political colleagues in central government. It must result in the complete dualling of the A2 and Jubilee Way from Eastern Docks to Lydden Hill by December 2022, at the latest, the imposition of the Dover IBF makes this imperative. The separation of local traffic from through freight traffic by means of flyovers and underpasses at the Duke of York, and Whitfield roundabouts must take place by December 31 2022, 2 years after the Dover IBF was announced. *SP14 would benefit from the addition of the following: **“Proposals which assist in the provision of alternative transport modes across a dualled A2 will be encouraged. The Council will work with Highways England and Kent County Council to improve accessibility elsewhere in Kent between the two principal access routes to the Port of Dover, the M20 and the A2. The Council will work with partners to improve access to the local and High Speed rail network.”***

DM Policy 29 The Highway Network and Highway Safety.

The statement is welcome and it is to be hoped the DDC Cabinet uphold it in the future.

It is proposed that the following wording replaces the final sentence in DM Policy 29, in order to clarify levels of significance or severity of increased traffic: "A Travel Plan or Transport Assessment will be required for all residential developments of more than 15 units, the requirements of which will be secured by planning conditions, Section 106 agreement or through the Community Infrastructure Levy as is appropriate."

Road improvements (especially on the A2, A20 and A256) to separate local traffic from through freight traffic must be done to save lives, road improvements that central govt must pay for this, especially as regards Strategic policies 4 Whitfield, 5+6 Aylesham and 7 Elvington and Eythorne. The separation needed must include flyovers and underpasses for local traffic.

Improvements to the highway network must also include underpasses for (electric) bikes and real dutch-style, protected cycle-paths so that cycling commuters from Whitfield can get safely to Kearsney rail station and Martin Mill Stns. There should be a safe, engineered, dedicated cyclepath from Aylesham to Elvington, and another from Elvington to Shepherds Well. Safe kerbed pavements must be provided running from bus stops on A roads to any new development of 8 homes or more in rural village settlements to prevent old and young being trapped by car dependence up unsafe B-roads, which costs KCC money for taxis from schools, (see Kent active travel strategy). *Applicants must demonstrate that their plan includes the installation and cost of installation of the protected cycle-paths and kerbed pavements described above.* Dept for Transport consultation Feb 2021 on trends in innovation in rural transport is relevant.

DM Policy 30 Parking Provision on new Developments

Addition needed; to comply with the Kent and Medway Energy and Low Emissions Strategy, *applicants should limit off-street parking to space for a maximum of 2 cars per dwelling.*

DM Policy 31 Providing Open Space. This is welcome

DM Policy 32 Playing Pitch strategy. This is welcome

DM Policy 33 Protection of Open Space. This is welcome.

DM Policy 34 Community Facilities. Add *(buildings or land or woodland)* after retain, enhance and maintain community facilities

DM Policy 35 Digital Technology This is welcome, see comments on co-working spaces above. (There are areas of the district where 'superfast broadband' connections are so slow (especially during lockdown with added use of bandwidth) that residents have been preventing from accessing the local plan consultation portal).

Chapter 10 Design

Strategic Policy 15 Place making

DM Policy 36 Achieving High Quality Design

Nature, d. We commend the statement about open spaces. An additional sentence is needed : *Enhance biodiversity in line with Kent Nature Partnership commitment to 20% enhancement to restore Kent's depleted natural capital and mitigate 6th mass extinction. Retain all trees on the perimeter of large developments and pockets of existing trees within developments (see Chap 5).*

DM Policy 37 Quality of Residential accommodation: (See our recommendation on zero carbon homes above under Chapter 5 DM 1)

Chapter 11 Natural Environment

It is strange that this chapter is so removed from Climate Change chapter 5 with which it is so intrinsically linked, in planning as well as in real world terms. Climate change mitigation means protecting current natural carbon sequestration to the maximum and adding more natural carbon sequestration. The natural environment reaches far beyond the designated areas listed. The targets set to remedy our existential crises will not be met, by omitting huge swathes of Dover district that are key to reaching targets on commitments on the climate and ecological emergencies, viz 6th mass extinction event.

We understand that evolving policy of KCC, is to measure and protect natural capital across Kent. This is also expected to feature in the soon-expected Environment Bill, promised in the Conservative party manifesto 2019.

Natural capital is the world's stocks of natural assets including soil, minerals, air, water and biodiversity. These assets provide a range of 'ecosystem services' that enable us all to survive and thrive. The most obvious services include the food we eat, the water we drink and timber we use for building and for fuel. Less visible ecosystem services include climate regulation, carbon sequestration, natural flood defence, water filtration, species habitat, and health and wellbeing. The Goodwin Sands nurture marine fauna and flora and provide a natural protection from coastal erosion. As such the Goodwin Sands should be considered part of the District's natural capital, and be fully protected as such.

Item 11.3 The Kent Nature Partnership commits to 20% biodiversity enhancement and so the 4th bullet point needs to add *Enhance biodiversity in line with Kent Nature Partnership commitment to 20% enhancement to restore Kent's depleted natural capital and mitigate 6th mass extinction.*

Strategic Policy 16 Protecting the district's hierarchy of designated sites. We welcome this statement

Strategic Policy 17 Green Infrastructure and Biodiversity:

We recommend adding, *Retain all trees on the perimeter of large developments and pockets of existing trees within developments (see Chap 5.) Work with Kent Nature Partnership to evaluate, and match protection of all natural capital. Work to retain & enhance natural capital generally, mindful of the KCC commitment to establish the growth of 1.5 million new planted trees across the county.*

paragraph 3 Change 'should' to 'must'

DM Policy 38 Biodiversity net gain

Add *Enhance biodiversity in line with Kent Nature Partnership commitment to 20% enhancement to restore Kent's depleted natural capital and mitigate 6th mass extinction.*

DM Policy 39 Landscape Character.

For many in Dover, especially those living in harsh economic circumstances, being able to look up to our green hills, brings peace and assuages grief in dark times. The same applies throughout the district. Protecting landscape character, for those on all incomes, for those of all ages, across the district, is intrinsically linked to mental and physical wellbeing. Landscape character both within the Kent Downs Area of Outstanding Natural Beauty (AONB), and in all other places, also underpins our green tourism economy. Losing landscape character to satisfy the demand for 30% profit margins of volume developers who have the ear of London ministers, would be shooting ourselves in the East Kent foot, and cost us dear.

DM Policy 40 Thanet Coast and Sandwich Bay SPA mitigation strategy. We commend.

DM Policy 41 Air Quality

Given the failure to get the Dover Inland Border Facility shifted from the location between a) the Dover Leisure Centre, where local sportspeople will suffer increased air pollution, and b) Christchurch Academy where students and staff will suffer increased air pollution and c) Dover Road, Guston where residents will suffer increased air pollution; given that the location of the IBF on a non-dualled A2, will lead to slower HGV and car journeys and longer periods of emissions from queuing vehicles, there is a need for an increase in Air Quality Monitoring Zones, in Guston, outside the Dover Leisure Centre, on the Duke of Yorks roundabout near DYRMS school, on the Whitfield roundabout and in Dover town, on the A256 Barton Road. (If the IBF and the jobs that go with it, had been relocated in autumn 2020 to a site further inland where the A2 is dualled, traffic flow would have been less impeded, and the Dept for Transport and DDC cabinet would have shown a greater respect for the KCC and Kent and Medway Energy and Low Emissions Strategies.)

DM Policy 42 Water Supply and Quality :

There exists the danger that too much greenfield development / concrete will speed up runoff during wetter winters and lead to soil erosion. Conversely, to protect our production of food from suffering drought in more extreme summers, it is essential that rainwater and grey water harvesting be a prerequisite on new homes, and shade from existing retained trees be ensured. Moreover over-use of nitrates on farmland will reduce the supply of water that can be used by residents, and pollute streams, rivers, ponds and aquifers and endanger wildlife.

DM Policy 43 The river Dour . We welcome all protections of this iconic stream / river.

Chapter 12 Historic Environment

This Chapter is generally very positive in terms of the draft policies for the protection and enhancement of the historic environment. There is, however, a requirement for a specific policy dealing with any developments within the Lydden Valley/former Wantsum Channel, the evolution of which may well be germane to our understanding of the creation of the English Channel (see below) as there is for Dover Western Heights.

Strategic Policy 18 is to be supported.

DM Policy 44 is welcome in that it refers not solely to the heritage asset but also to the setting of the asset. There is also a requirement for a Heritage Statement where a “heritage asset or its setting” are likely to be affected. The whole building approach to developments involving energy conservation improvements is to be welcomed.

Where DM Policy 44 is weak is that it does not explicitly require conservation of an asset by recording. A suggested addendum to this policy would be at the end of the third paragraph: “... **securing the optimum viable use of the heritage asset or ensuring its preservation through appropriate recording.**” This would link DM Policy 44 more directly to DM Policy 46.

DM Policy 45 Conservation Areas is generally welcome though the introductory sentence should be strengthened to read: “Applications for development or redevelopment in Conservation Areas will **only** be supported provided that such proposals preserve or enhance the special architectural or historic character and appearance of the Area and its setting.”

Within this Policy, however, consideration should be given to reducing heat and energy loss and to sensitive solutions to providing energy efficient heating systems by adding a suitable further bullet point along the lines of: “**Employ sustainable heating systems, such as ground source heating, and means of reducing energy and water consumption as are compatible with securing the sustainable future of the Area and its setting.**”

DM Policy 46 Archaeology is welcome.

DM Policy 47 Dover Western Heights Fortifications Scheduled Ancient Monument and Conservation Area rightly emphasises the importance of the intervisibility of features both within the monument and with the wider landscape in order to fully understand the historic significance of the monument.

DM Policy 48 Historic Parks and Gardens is welcome.

The Lydden Valley/former Wantsum Channel is identified in Chapter 11 as forming a group of Landscape Character Types ((LCTs A, B and C) paragraph 11.42 and Table 11.1). Elsewhere in Chapter 11 (Fig. 11.1) the concentration of National Nature reserves, SSSIs and Special Protection Areas where the Wantsum meets the English Channel is demonstrated in map form. Historically, it is known that the Wantsum Channel provided a route for water borne traffic avoiding the more difficult waters around the North Foreland. Little is known of the evolution of this Channel and its silting up. As an area of more or less open water at different periods in the past various historic artefacts might be expected, such as fish traps, landing stages, salt working sites, temporary or permanent settlements taking advantage of the varied environments, and perhaps water craft. Ground disturbance along the line of the Wantsum Channel and its edges are likely to produce organic palaeo-environmental evidence which will add to the limited inorganic palaeo-environmental evidence from sites on chalk downland. This material could include timber structures and artefacts, vertebrate and invertebrate fauna, pollen, and aSedDNA.

The Wantsum Channel is generally assumed to have been an open channel between the mainland of Kent and the Isle of Thanet, but how that channel arose in the first place is unknown. Given recent research into the creation of the English Channel, it may well be that the Wantsum Channel was created by the same tsunami, caused by the Storrega underwater rock slide, that obliterated Doggerland and carved out the present English Channel around 8,000 BC. The area potentially has immense national and international importance for understanding the late Palaeolithic and Mesolithic periods as well the development and use of the landscape in more recent periods.

The inclusion of a specific statement and policy for the Lydden Valley/Wantsum Channel and its margins would appear appropriate, matching that for the Dover Western Heights and the Dover Town Centre SPD. It is suggested that the following statement is inserted after paragraph 12.29:

“12.30 The Lydden Valley/Wantsum Channel provided a water route south of the Isle of Thanet avoiding the more difficult waters around the North Foreland at various times in the historic past. The origin of the Wantsum is unknown but may be linked to the formation, around 8,000 BC, of the English Channel as we know it today. Ground disturbance within the Wantsum and along its ancient shore line is likely to reveal evidence of the origin and development of this important landscape feature as well as evidence of its use from the Mesolithic through to the present day.

DM Policy 48 The Lydden Valley/Wantsum Channel

Proposals for development within the Lydden Valley/Wantsum Channel which make provision of appropriate archaeological and palaeo-environmental investigation prior to development will be supported. For the purposes of clarity the limits of the Lydden Valley/Wantsum Channel’s archaeological and palaeo-environmental area of interest will be co-terminous with the limits of the Environment Agency’s Flood Risk Map.”

Paragraph 12.30 and Policy DM 48 Historic Parks and Gardens to be renumbered accordingly to take account of the proposal above.

ENDS

