

Public Consultation 21 Oct to 9 Dec 2022 Reg 19 new Local Plan:

Submission from Dover and Deal Green Party

Response on 2 Vision & Objectives (cross referenced to Response App F Local Plan Policies; Supporting Documentary requirements for planning applications.)

We have grave doubts that the SPs, SAPs, and DM policies will meet the aspirations, vision and objectives announced, and that they will deliver a bright future of equitably distributed prosperity for the district. Throughout the Reg 19 Local Plan there are references to the secretive 'pre-application process' which excludes the public, We submit that this process can exacerbate problems referred to in the 2020 report on England's planning processes from Transparency Intl UK; 'Permission Accomplished : Assessing corruption risks in local government planning'; problems TIUK recommend resolving with 'increased transparency, tighter rules, and strengthened oversight'.

(The rail line from Dover Priory through Kearsney (close to Whitfield Urban development) to Canterbury East and Faversham, the Victoria Line, should be added to graphic page 17, it underpins siting of some large developments.)

Key issues for the Local Plan. P 18

Speaking to local residents, time and again, they point to details later in the plan where the effectiveness of policies and the degree to which they are justified (SP or DM) and residents' experience of DDC previous actions are incompatible with the Key Issues listed on page 18, and as such they need to be made more sound.

Overarching Vision and Strategic objectives are designed to be, and are, emotionally inspiring. But we note numerous areas where the policies are not compatible with the aspirations described in Vision and Objectives. It is striking how very often the first comment from the public when planning is mentioned, is that the big developers run the LPA, and other LPAs in Kent, because of the strength of the developer lobby and its donations to the party in power and there is little local political backbone to prevent high profit ribbon suburban development overrunning the beautiful district that residents love, causing dangerous gridlock in our compact coastal towns. Prime Minister Sunak's announcement on 5 Dec 2022 about dropping compulsory housebuilding targets, means this Plan's SP3 and DM-H1 are unsound and not compliant with emerging govt policy. We note a prevalent belief among the public that well-meaning young planners are subject to a culture that puts satisfying 'developer partners' above the pleas of the electorate. Before Reg 18 DDC expelled community groups such as the Deal Society and The Dover Society and representatives of level 1 councils from the Local Plan Working Group (raising a question about the compliance with the Localism Act of 2011, and whether the Plan was positively prepared). This is tragic in terms of expectations of local democratic accountability and a dangerous form of disaffection. The public expect any local plan to be implemented by a planning committee, from which any local councillor/ businessman who has any contractual links with developers (or insider, friendly shared-knowledge of plans) must be excluded, there should not be even a sniff of conflict of interest issues.

D&DGP Responses on Section 3 Strategic Policies

SP1 Planning for Climate Change

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

The local plan is not compliant with legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008), in that it is too weak. 'contributes to . . . ' encourages tokenism from developers. Developers would not starve if their return on investment were reduced from 29 or 30%.

To become effective and sound and compliant with the law to make Dover and UK zero carbon by 2050, the following should be added: (based on Plymouth and South Devon Joint Local Plan 27 adopted 2019 by 3 LPAs West Devon BC, South Hams DC, Plymouth CC)

Delivering low carbon development

The need to deliver a low carbon future for Dover district should be considered in the design and implementation of all developments, in support of a 2019 commitment to make Dover district net zero carbon emissions by 2050, it is necessary to halve 2005 levels of carbon emissions by 2034, and to increase the use and production of decentralised energy. The following provisions apply:

Developments should identify opportunities to minimise the use of natural resources in the development over its lifetime, such as water, minerals and consumable products, by reuse or recycling of materials in construction, and by making best use of existing buildings and infrastructure.

Major development should take account of projected changes in temperature, rainfall, wind and sea level in its design with the aim of mitigating and remaining resilient to the effects of changing climate.

Development proposals will be considered in relation to the 'energy hierarchy' set out below:

Reducing the energy load of the development.

Maximising the energy efficiency of fabric.

Delivering on-site low carbon or renewable energy systems.

Delivering carbon reductions through off-site measures.

Developments should reduce the energy load of the development by good layout, orientation and design to maximise natural heating, cooling and lighting, and reduce the heat loss area. For major developments, a solar master plan should show how access to natural light has been optimised in the development, aiming to achieve a minimum daylight standard of 27 per cent Vertical Sky Component and 10 per cent Winter Probable Sunlight Hours.

All major development proposals should incorporate low carbon or renewable energy generation to achieve regulated carbon emissions levels of 20 per cent less than that required to comply with Building Regulations Part L.

Developments will be required to connect to existing district energy networks in the locality or, where there is a future network planned, to be designed to be capable of connection to that network. Where appropriate, proportionate contributions will be sought to enable a network to be established or completed.

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

(This is stronger than Mitigation a, b, c, d. and nothing less will put DDC on track to meet its legal commitment to be net zero by 2050, or be compliant with UK legal commitment to be net zero by 2050) Cross referenced with DM policies CC1 and CC2 and CC3.

‘Mitigation f’ must include following in order to become effective and sound. ‘ All new developments of over 40 dwellings must contribute to a Community Infrastructure Levy so that engineered kerbed cycle routes can enhance cycle paths 1, 2,15,16,17, and new engineered cycle tracks must be made safe in winter dark afternoons, new engineered cycle routes must link Whitfield Urban Development with Kearsney and Martin Mill stations and Elvington with Snowdown and Aylesham and Shepherdswell Stations, especially given the rural bus cuts implemented in these villages in 2022. *Also trains and buses on the key commuter routes must be equipped to carry (electric + cargo) bikes.* Cross referenced with DM policy TI1. CIL is also needed to pay for other infrastructure essential for the local plan to be sound which is referred to below.

SP2 Planning for Healthy and Inclusive Communities

There is a large proportion of people living in unhealthy, damp, outdated housing within Dover town’s most deprived wards, sometimes owner-occupied, sometimes privately rented, less often council housing. As AirB&Bs push tenants out of coastal Deal, the demand for poor housing, EPC rated E, F, G, is increasing and the rising rental price traps people in fuel and food poverty. Any Strategic Policy on Planning for Healthy communities has to address this, or be judged as very ineffective, unsound and non-compliant with NPPF and legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008.

The SP2 encourages developers of new mostly greenfield sites to make them healthy, (it should word this more strongly to compel developers to do what is in the public interest to become effective and sound). But it fails conspicuously to provide a plan to replace or transform unhealthy, damp, outdated housing within deprived wards so that they become future-proofed zero carbon homes on those same streets of our deprived wards, thus saving the public purse costly curative health bills. For those who pretend the impoverished residents of deprived wards will be able to move to the new Whitfield Urban Development, we have to ask what do they expect to happen to the unhealthy properties they move out of in town? Is a ghetto or a ghost town envisaged? In the case of private rented properties, either compulsory purchase or schemes to incentivise private landlords would be needed, to upgrade these properties. Without such a plan, claims about planning for healthy communities ring hollow. We recognise that the DDC planning team have had to do much of the preparation of the Local Plan before the cost-of-living crisis and economic turmoil of autumn 2022 crashed upon us all. But harsh realities are upon us and changes are needed.

(See our comment below on SP5, on the policy of Dover Urban Area nil provision of affordable housing which we consider both unsound and non-legally compliant, and unjustified on ‘viability’ / developers expected return on investment grounds).

Specifically it does not apply to the proposal to build houses over the catchment area of the aquifer to the south of Deal (SAP 14 / 15), or a number of similar proposals, or with the scale of internal migration into the area as shown in Evidence base.

SP3 Housing Growth The Housing Growth statement that the aim is to , “provide a greater choice of high-quality housing to meet the needs of Dover districts’s growing population and changing demographic and address affordability issues”, does not seem internally consistent with the details provided in the plan which underestimates the evidence showing a large part of district population growth is due to aging. The details thus render SP 3 and SP 5 ineffective, unsound. Moreover with the announcement by Prime Minister Sunak on 5 Dec 2022 that compulsory housebuilding targets are to be dropped, the DDC numbers are not compliant with emerging government policy.

The government department (DLUHC) decision that Dover needs 611 new dwellings a year and a minimum of 10,998 new homes between now and 2040 we find very incompatible with legally binding Net Zero Strategy, Climate Emergency

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

Declaration 2019 and Climate Change Act 2008, and unsound. We should be transforming homes into zero carbon homes as is happening in East Sussex, led by Lewes DC. Combining these numbers with 3.51 and the statement '76.7% of the new homes are on greenfield sites, while 23.3% are on brownfield sites' is unsound and unacceptable to the public. It must also be pointed out that at least one of the sites included in the 23.3% of brownfield sites is actually a site intended by SEEDA as local nature reserve having rewilded on unstable slag (only rendered stable by tree-planting), a site which DDC forgot to make a local nature reserve in 2004, and it has become a biodiversity hotspot well known to genuine ecologists nationally, Betteshanger Park, and ought to be designated a Biodiversity Opportunity Area.

We note that central government in London, according to Housing Today is imposing a disproportionate amount of housing growth on Kent and the SE. The FT has shown a quarter of Con party donation come from the property developer lobby. We note 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. So the chances, of protecting Kent, 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 compact coastal towns of the size that Deal / Walmer and Sandwich were 5 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 stopped or radically reduced. For example either or both of SAP 15 / SAP 34 would destroy the only road access alternative for diverted traffic. (See detailed comments under SAP 15/ SAP 34 below). Housing Growth that threatens gridlock, blocking off a conurbation of 30,000 from access by emergency vehicles, commuters, school buses is not sustainable housing growth and is very unsound.

3.29 We note and welcome a degree of shift from the Reg 18 draft, in that more sites have been selected with a view to using 'existing infrastructure, facilities and services, with a greater professed purpose to ensure development contributes to the sustainability of local communities and services'. We note with appreciation both the increase in the number of sites in Dover town SAP 6 – SAP 13, and the SAP 26 Former Snowdown Colliery, Aylesham near a rail station for example. It should be possible to state a determination to 'make best use of brownfield – non-rewilded – land) without giving developers the opt-out qualification 'wherever possible'.

On Five Year Housing Land Supply. 3.39 Having stated the Council had 6.03 years land supply plus a 5% buffer; it is not sound, effective or legally compliant to then state 'the provision of additional sites within the first 5 years of plan period is needed to ensure resilience and promote flexibility;!' Instead of ensuring resilience, it will create exactly the destructive suburbanisation of a rural district that many, many of the resident electorate are most worried about. The 10 year buffer proposed, 3.40 is worse and demonstrates the culture of 'whatever developer partners ask for' referred to above.

3.46 It is the conspicuous lack of a secondary school in Aylesham that prevents Aylesham becoming the small garden town planners aspire to. The provision of a secondary school by 2028 should be a condition of SAP 23.

3.48 Many, many of the current residents of ex mining village Elvington were / are dependent on buses that have recently (2022) been cut, (following KCC cut to bus subsidies) to get to work in Canterbury, Folkestone, Sandwich, Thanet or Dover, or to get to secondary school, or to get to doctors, or to shop. These people **had** environmentally sustainable public transport service that has been cut. Kent CC is saying it is looking at potential bankruptcy in 2023, so promises of new services and facilities are met with some disbelief. Residents in Elvington where SAP 28 is planned on the cricket field next to their Tilmanstone Welfare club, feel that DDC / KCC (and all of our KCC cllrs are double hatters also sitting on DDC LPA) have served Elvington ill. The selection of this site is **ONLY** sound with cast-iron conditions to provide all of the services we mention below, including new drainage infrastructure. Council housing in Elvington has been subject to flooding from the sewage system, long overdue for replacement. As in Dover deprived wards, there are unhealthy EPC EFG homes in Elvington that need to be transformed into zero carbon home to lift residents out of fuel and therefore food poverty.

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

3.68 Windfall. Unless existing settlement boundaries are respected, there is suburban ribbon development creep from field to field to field. To render the plan sound it should contain a statement *'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 Act 2011.'* In Nov 2022, it seems very naïve to hope that 'new housing in villages can help them retain existing services such as public transport, retail (many pubs are going under because lack of staff and sky high energy bills) and schools (again oversubscribed local schools fear they will go bankruptcy with sky-high energy bills).

SP4 Residential Windfall Development

As stated below on SP5, the policy of Dover Urban Area nil provision of affordable housing is both unsound and non-legally compliant. Moreover the reality is that during the life of the last Local Plan, Deal experienced 30% more housing development than was planned. So this policy would only be sound if it were amended 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.* (See our comments on DM - H1 below. (Comments on SP9 refer.)

SP5 Affordable Housing

3.79 Provision of affordable housing. We believe it is both unsound and not legally compliant for DDC dept of Planning to say **'for Dover urban area it is not viable to require affordable housing including the minimum requirement in the NPPF 2021 for 10% affordable homeownership.** (See our recommendation on SP4 above on how to incentivise developers to provide affordable housing needed in Dover Town). We note some mitigation in 3.91 since the Reg 18 consultation, but it is still completely unsound. We very much regret that DDC Local Plan was delayed until after the NPPF was changed in this respect in 2021. We note that the Thanet Local Plan adopted 2020 included a requirement for 30% affordable housing / homeownership throughout the district, with no urban exclusions, in accordance with the previous version of NPPF. (Cross reference DM policy H1 / SP 9). We note that <https://www.labcwarranty.co.uk/media/2694/land-development-report.pdf> shows that return on investment for developers in Kent in 2021 was 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 in local elections to vote, or not), are keen for Dover urban area to get the warm, healthy, affordable homes that it is crying out for.

3.81 We are relieved to see 30% requirement affordable for the rest of the district referred to here, but it will not become sound or effective unless it becomes a real requirement and not just 'a starting point'.

3.83 and 3.84 should be strengthened to become sound.

Alas 3.86, about helping people move out of the private rented sector seems unsound and wildly over optimistic in Nov 2022. And it is the transformation of council housing into zero carbon homes, and an increase in social rented, zero carbon homes at scale, homes that will be publicly owned in perpetuity and cannot be lost to private landlords through right to buy, that will address Dover's most urgent needs.

SP6 Economic Growth.

Quality of 'growth' is more important in crisis-ridden 2020 to 2040 than quantity of 'growth'. Because it is more sustainable as we look ahead to 2040 – 2060 and beyond. Quick fixes, gig economy and nail-bars do not a climate-friendly sustainable economy make.

November 2022. Energy prices, business rates, public sector cuts are making public and private sector employers (care homes, schools, health centres, hospitality, police (£30 million cut in Kent), buses, independent retail) fear for their survival. The reality.

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

Public Works Loan Board or municipal loans could be used in Dover as in East Sussex, where they've invested in skilled jobs transforming existing homes into zero carbon homes across seven district councils. ([The Lewes Model explained | Green World](#)) To be sound, effective and compliant with the realities of here and now, this is the direction DDC Local Plan should take. The local economy needs pump-priming, national fuel security needs to be enhanced, people need lifting out of fuel poverty. The local plan could do more than allocating sites and floor space.

Transition to a greener economy, a means of making us more resilient economically, will be helped considerably by the ambitions of Port of Dover to decarbonize its estate by 2025 and to take seriously its scope 3 corporate responsibility in an inclusive manner to support local communities and economic players as they transition to a greener business too. Our team, which included 2 councillors elected to Dover Town council in 2019/2020, 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 have since become aware of PoD's interest in hydro renewables too. 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.

There appears to be little mention 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 are essential in Dover District. With a 70% rural economy, which is severely challenged by increased costs of imports, 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 small-scale 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, and is especially sustainable where zero / minimal pesticides are used, and Nature Friendly Farming practices are used. (See comments on opportunity to protect and expand Horticultural Belt LCT D in north of district in NE2 below) **So rural areas, fields and woodland should be valued as locations of employment in themselves.**

The up-grading of all rented housing stock (both public and private sector) to **zero homes** standard, mentioned above, would mean, it doesn't need to be done again before the local and legally-binding national target of 2050, and is thus a pre-requisite for the Local Plan to become legally compliant, and this can be made to benefit the local economy. 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 2023, EPC B 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, (DDC could plan an intermediary role or 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.**

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

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 below, also on car parks), 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.

The Dept for Transport bought the site they wanted for Dover Inland Border Facility from a farmer in Guston for £22million, and in 2022 DfT publicly said the site would not be needed as Dover IBF. Could this become a combination of grazing under solar canopies? Near 2 schools and a sports centre, it is an unsuitable location for the HGV park that is needed at a site further outside the Dover urban area.

Tourism and Tourist / Visitor Accommodation.

It is very unsound, for DDC to fail to make AirB&B owners register with them, so that they can be charged business rate council tax. In terms of housing provision, AirB&B, both nationally, and in Kent's coastal towns especially, have a very negative effect of reducing the private rental market in 2022 and thus forcing up the average monthly rents for private tenants, while we have a cost-of-living crisis, so homelessness, hidden and audited, increases. Green tourism, and 'safe' country lanes, are East Kent assets that would be very unsound to trash.

The local plan would be more compliant with legality, if DDC regeneration took the greening of the economy more seriously and looked at smaller zero-carbon tourism /transport activity projects within Dover 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).

Economic Growth in a coastal town aspiring to attract tourists would be unsound unless it included trebling the number of toilets installed. Tourists as well as residents 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 inhabitants to toilet blocks 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 5 years, had 2 signs on Maison Dieu Road telling coach drivers and visiting car drivers 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.

SP7 Retail and Town Centres

SP8 Dover Town Centre

There is a need for pleasurable, retail-browsing experiences; This means stopping the Dover gridlock events that lasted most of April 2022 and in July 2022. It 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 should be tempted back all year round, so that there were more footfall further inland, up Biggin Street, further west than the St James retail centre. 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. 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. This area of one-way west-bound A256 is crying out for air pollution to be reduced and for embellishment, and it is Living Walls of

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

vertical planting / urban hedges that are called for. The same applies to one-way, port-bound Barton Rd / Maison Dieu Rd A256.

Many public buildings in mid Dover area, offer opportunities to enhance national and local energy security if they were to gain solar power installation that could be used by neighbouring carehomes, or doctors' surgeries (solar energy is most economical viable when exported to neighbouring premises using electricity during daylight hours all year round).

Walking / cycling / driving along London Road could become a much more cheering experience if Living Walls referred to above, combined with murals (for years community groups have offered creative talents to do this, time for Dover TC/ DDC to become more hearing councils. Underpinning the promotion of the town is the urgent installation of public toilets. (See comments above SP6 Economic Growth / Tourism) The stalemate between DoverTC and DDC has to be overcome by installing a minimum of 3 new modern self-cleaning toilet blocks, one at Maison Dieu, in 2023; in the interests of Dover residents, and local visitors from around East Kent and visitors from further afield. And as the Port of Dover Community Forum pointed out, while PoD have provided lavatories at the Clock Tower space, it is not their role to take away from councils their responsibility to restore toilets and make the town as hygienic as it was in the 1980s.

SP9 & SP 10 Deal & Sandwich Town Centres

Both of these compact centres would benefit from '20 is plenty' policies being introduced, Sandwich has. Walmer TC has put this on its HIP Highways Improvement Plan. This would protect the retail and residential streets that exist, and make the retail centres more attractive for young families with buggies, and for many others. 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).

The relative success of Deal Town Centre is threatened by the congestion caused by over-development on the outskirts of Deal/ Walmer. With many developments still in the planning and building stage, even more congestion should be anticipated from 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 detailed 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 buses. 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, these are reasons why we say SAP 14, SAP 15, SAP 34, are unsound. DDC dept of Planning 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.

SP11 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 11 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.

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

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, and answer for its decisions before the electorate. The plan would become more sound and effective if it included Council intention to implement a CIL before the Plan has run a quarter of its projected course, and a further sentence should be added to SP11 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."**

SP12 Strategic Transport InfraStructure

For SP1 and SP12 to be linked up, 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. See comments in SP1, on the many engineered cycle routes needed.

DDC are on record 2021 ***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'***. 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. Neglect by DfT and Highways England means that with biometric passport checks in 2023, residents can expect gridlock again and again.

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 and foot bridges, including under / over the A20 route through Dover town. 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 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.

The Council's 'commitment to work with HE on long term improvements to A2' must be more than pious lip-service reiterated to political friends in central government. It must result in the complete dualling of the A2 and Jubilee Way from Eastern Docks to Lydden Hill. The separation of local traffic from through freight traffic by means of flyovers and underpasses at the Duke of York, and Whitfield roundabouts must be done at the expense of central govt, Dept for Transport/ Highways England. Residents of the garden of England should not suffer because national traffic flows on our roads, given the failure of implement freight to rail policies. *SP12 would become more sound with 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."*

SP13 Protecting Hierarchy of Designated Environmental Sites & Biodiversity Assets

To be sound and effective, the SP13 must be underpinned by a requirement that nothing is done without 'robust auditing' (as Wildlife Trusts insisted on in Environment Act 2021). This means that honest, objective-because-independent, before-and-after evaluations / baseline measurements must be used. Sketchy, google-map-based ecology reports paid for by developer applicants are deceptive in the extreme. Developers are ill-placed to self-certify their own work in this area, and DDC need a DM policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.

SP13 Policy on International sites includes the very unsound and ineffective and non compliant with Environmental Act 2021 statement d. *Wintering bird surveys . . . That when impacts cannot be avoided, appropriate mitigation in the form of new habitat creation / management in perpetuity or provision of sites for these species elsewhere .*

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

Wild fauna, wild birds in particular, are very disinclined to read and heed the instructions of DDC / or developers. When their habitats are taken, they fail to thrive, fail to breed and die out. Hence the 6th mass extinction of species. And the species evidenced on just one typical section of East Kent include : breeding Mute Swan, Moorhen, Collared Dove, Cuckoo, Skylark, Meadow Pipit, Blackbird, Cetti's, Reed and Sedge Warblers, Wren, Linnet and Reed Bunting. It is also a partial feeding area for a number of species such as Heron, Little Grebe, Grey Partridge, Kestrel, Buzzard, Black-headed and Herring Gulls, Woodpigeon, Stock Dove, Barn Owl, Swift, Swallow, House Martin, Yellow Wagtail, Dunnock, Song Thrush, Carrion Crow, Rook, Starling, House Sparrow and Chaffinch. Historically Redshank, Lapwing, Snipe and Yellow Wagtail used to nest here. Many species of native plant and habitat for invertebrates, mammals such as bats, Hedgehogs, Harvest Mice and Water Voles will also be lost. Losing these species will be a considerable biodiversity loss and contrary to the requirement for the unsatisfactory 10% biodiversity gain DDC commitment, and **very contrary** to the KCC requirement for 20% biodiversity net gain. The Kent recorder is also concerned about the area because of rare flora, bats, fungal species need protecting.

SP14 Enhancing Green Infrastructure & Biodiversity

The Environment Act of 2021 has a legally binding 2030 species abundance target, whose professed aim is to help reverse the drastic decline in wildlife and put the nation on track to protecting 30% of land and sea for nature by 2030; also there is a new requirement for planning applications to provide Biodiversity net gain and for Local Nature Recovery Strategies to create a framework for a national system of interconnected sites for nature.

In SP14 the words about Local Nature Recovery Strategy and the Kent Biodiversity Strategy are impressive and reassuring. But the very restricted BOAs (Biodiversity Opportunity Areas), to which they are applied renders them less than effective. Residents' local knowledge (members of Sandwich Bay Bird Observatory, Kent Wildlife Trust, local members British Trust for Ornithology, etc, etc), could increase DDC's awareness of more potential BOAs by approx. ten times at a conservative estimate.

Net Gain should be measured using the latest DEFRA measurement tool [The Biodiversity Metric 3.1 - JP039 - GOV.UK](#) **and also** an additional metric should also be used consisting of a list of all species to be established in consultation with Kent nature-concerned NGOs, (Kent Wildlife Trusts and others). The DEFRA metric favours the developer as it only takes into consideration protected species and habitats. In the proposed Local Plan, the Appendices give an Evidence Base. This predominantly deals with species and habitats protected in Law and ignores all the other species in the District which are in decline. To be sound and effective, any and all Biodiversity net gain policies must join up the living dots.

The UK is one of the world's most nature-depleted countries, in the bottom 10% globally and last among the G7 group of nations, new data shows. It has an average of about half its biodiversity left, far below the global average of 75%, a study has found. In contrast, a figure of 90% is considered the "safe limit" to prevent the world from tipping into an "ecological meltdown", according to researchers.

Planning policies which single out building development for "improvement" and avoid the other causes of this dramatic biodiversity loss, are inadequate and need strengthening to become effective. In a report entitled "The state of nature: 41 percent of UK species have declined since 1970s" (NHM 2019) the main drivers of decline are as follows –

- Changing agricultural management
- Habitat fragmentation
- Pollution
- Urbanisation
- Woodland management
- Invasive non-native species
- Fisheries degradation

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

All of these areas should be considered in any Plan including the DDC one.

SP 14 Under the Hunting Act 2004 foxhunting became illegal, DDC should include in its SP14 encouragement for the rural Police to uphold the law in this respect and discourage any drag-hunting which results in the 'accidental' tearing apart of wild animals.

Examples of wildlife needing protection from loss of habitat around the boundaries to the north, west and south of Deal (e.g. SAP 16 sites Ground Water source protection 2 or Flood Zone 3), which is itself representative of the larger district. Evidence (BTO Initial Sites Review recorded as accepted) shows: Much of the area is in Flood Zone 3, farmland and has an extensive biodiversity value – briefly, to name a few, breeding Mute Swan, Moorhen, Collared Dove, Cuckoo, Skylark, Meadow Pipit, Blackbird, Cetti's, Reed and Sedge Warblers, Wren, Linnet and Reed Bunting. It is also a partial feeding area for a number of species such as Heron, Little Grebe, Grey Partridge, Kestrel, Buzzard, Black-headed and Herring Gulls, Woodpigeon, Stock Dove, Barn Owl, Swift, Swallow, House Martin, Yellow Wagtail, Dunnock, Song Thrush, Carrion Crow, Rook, Starling, House Sparrow and Chaffinch. Historically Redshank, Lapwing, Snipe and Yellow Wagtail used to nest here. Many species of native plant and habitat for invertebrates, mammals such as bats, Hedgehogs, Harvest Mice and Water Voles will also be lost. Losing these species will be a considerable biodiversity loss and contrary to the requirement for a minimum of 10% biodiversity gain. How will this loss be calculated? There two other plots in this designation - Sholden to Betteshanger roundabout surrounding Cottington Court Farm and Betteshanger Country Park access road to Foulmead Cottages behind farm shop which are both deemed unsuitable, which is correct – they are both farmland and would create chaos on the A258 in addition to the loss of biodiversity, open space, increase in light pollution, disturbance, etc.

The statement SP14 **b** must be made real and effective, and rendered sound by robust auditing and independent baseline assessments and recruitment of a much larger planning enforcement team. Then *'Every development will be required to connect to and improve the wider ecological networks'*. would become effective and sound instead of token.

SP14 3.290 Kent County Council requires 20% biodiversity net gain, and it is unsound for DDC to undermine this commitment. DDC local plan will only be sound if 20% biodiversity net gain replaces the 10% specified. The Kent Nature Partnership commits to 20% biodiversity enhancement. An addition to the Plan is therefore needed: *'Enhance biodiversity in line with Kent Nature Partnership's commitment to 20% enhancement to restore Kent's depleted natural capital and to mitigate 6th mass extinction. Natural Capital is the world's stocks of natural assets including soil, minerals, air, water and biodiversity. These 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. Less visible ecosystem services include climate regulation, carbon sequestration, natural flood defence, water filtration, species habitat, health and wellbeing. The Goodwin Sands nurture marine fauna and flora and provide a natural protection from coastal erosion. As such the Goodwin Sands are part of the district's natural capital and need protection too.*

To become sound and effective and legally compliant bird boxes , bat boxes, swift bricks, street trees, garden trees should be required on all new builds.

If existing mature trees of a good size to capture carbon now, are replaced in 'urban expansion' areas (SAP 1, SAP 24, SAP 28) by young saplings that will not be able to capture a similar amount of carbon for 40 to 50 years, then the plan will not be legally compatible with Environment Act 2021. Therefore to become sound and legally compliant SP14 should require 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 mature green infrastructure of amenity value to legally binding UK Net zero strategy 2019 and to new residents at little cost or inconvenience to the developer). Any new trees planted must tended with a guarantee to ensure survival 4 years after development completed.*

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

Moreover to become more sound and effective, we recommend adding, *Retain all trees on the perimeter of large developments and pockets of existing trees within developments. Work with Kent Nature Partnership to evaluate, and match protection of all natural capital. Work to retain and enhance natural capital generally, mindful of the KCC commitment to establish the growth of 1.5 million new planted trees across the county. Similarly, this policy would become more sound if the recommendations of KCC report 'Natural Solutions to Climate Change in Kent' of March 2021 paid for from the public purse, on the need for our district's (chalk) grasslands, wetlands, and woodlands to be retained and enhanced were adopted as a planning guideline.*

As with SP 13, to become sound and effective, SP 14 must be underpinned with a requirement for robust auditing, and honesty, otherwise extracting promises from developers all too often results merely in employment for public relations practitioners, and developers later apply for conditions to be removed. 'Where permission is given subject to conditions regarding tree retention, tree planting and / or biodiversity enhancement, applicants will need to agree to abide by 'robust auditing' (as Wildlife Trusts insisted was in Environmental Act 2021). This means that honest, objective because independent, before-and-after evaluations / baseline measurements must be used. Sketchy, google-map-based ecology reports paid for by developer applicants are deceptive. Developers are ill-placed to self-certify their own work in this area, and DDC need a policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.'

SP15 Protecting Historical Environment (see DM comments HE 1-4)

D&DGP Responses on Section 4 Housing and Site Allocation Policies

SAP 1 & 2 Whitfield (cross referenced SAP 51 Coldred)

We believe that the total number of new homes is inflated to suit property developer partners of the DDC planning department and the property development lobby who donate large sums to the party currently in government, (See comments SP3 above) This is relevant to the size of SAP 1.

As well as the SAP1 and 2 protection of the Dover Fast Track bus route and service, there need to be more measures to reinstate local bus routes cut in 2022; to make this sound measure to enable active travel are needed. To become sound, developers should contribute to a Community Infrastructure Levy so that engineered kerbed cycle routes can enhance cycle paths 1, 2,15,16,17, and new engineered cycle tracks, and pavements must be made safe in winter dark afternoons. New engineered cycle routes must link Whitfield Urban Development with Kearsney and Martin Mill rail stations (these being on different lines) and must link Whitfield with Elvington. *Also trains and buses on the key commuter routes must be equipped to carry (electric + cargo) bikes.* Cross referenced with DM policy T11

SAP 2 – 4.82. This will be more sound and compliant with Localism Act 2011 if the following is added, 'All proposals for the development of Phase 3, with or without, by DfT or DDC or a combination, should be subject to full and early disclosure to and consultation with, Guston Parish Council'.

SAP 3 – 13 Dover (see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective.

SAP 14 – 16 Deal (SAP 15 cross referenced to SAP 34/35 Kingsdown)

Developments at SAP 14 and 15 Walmer and Sholden will impact on surface water management and flood risk in North Deal, and Walmer.

SAP 15 . The selection of this site is unsound **firstly** as it incompatible with SP4 ; 3.71 Separation of Settlements and the need to prevent villages coalescing to protect landscape character.

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

Secondly it is unsound as its selection is incompatible with the statements in SP14 relating to biodiversity connectivity as this valley bottom is already functioning as vital point of biodiversity connectivity as referred to in SAP15, the northern and Western boundaries of the site, close to BOA Hawkshill Freedown, are key to biodiverse connectivity. 4.158 mis-names Hawkshill Freedown, which in fact is an SSSI because it is globally rare, chalk-downland habitat, (not just the 'open field' in the DDC text). For decades volunteers with Walmer council have lovingly protected this rare habitat, a very justified BOA.

The geography indicates that the valley bottom is also valuable as a flood sponge, so SAP15 is unsound **thirdly** for this reason too. Ray's Bottom drains in a northerly direction to the whole area immediately north of Walmer Castle which is well-known to be subject to flooding.

And **fourthly** the Highways assessment of this site is inadequate, SAP 15 is unsound because 4.160 fails to note that Liverpool Road is a single lane road (changing its name to Glen Rd) with passing places which becomes gridlock with traffic from Kingsdown Primary school 2x a day. It becomes an arterial road attempting to provide access to 30,000 conurbation of Deal / Walmer for diverted traffic when the A258 is blocked. (Cross reference SAP 34 in Kingsdown). So the selection is unsound on the grounds of danger to life from RTAs. The Transport Assessment requirement referred to in e makes no reference whatsoever to Liverpool Road becoming Glen Road at the Kingsdown parish boundary, and carrying diverted A road traffic. The inclusion of SAP 15 is not legally compliant with NPPF 2021 item 11. (b)ii *'SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'*.

SAP 17 – 23 Sandwich SAP 22 at Archers Low Farm presents especially damaging problems so The inclusion of SAP 22 is not legally compliant with NPPF 2021 item 11. (b)ii *'SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'*.

SAP 24 – 27 Aylesham The development of SAP 24 would only be sound if planning were granted conditional on the provision of a secondary school at Aylesham. And if Aylesham bus services cut in 2022 are reinstated(either through Community Investment Levy or through S106 agreement).

SAP 28 – 30 Elvington and Eythorne SAP 28 : Elvington desperately needs services. There is no doctors' surgery near since the Eastry surgery closed. Drains / sewage infrastructure are inadequate for current number of dwellings, bus services were drastically cut in 2022. A better, more affordable retail outlet is also needed. 300 houses surrounding Tilmanstone Colliery Welfare Club with access also on to Wigmore Lane and Barville Road are proposed with natural landscaping buffers. Nearby, highways are crying out to be made safe and widened with pavements and pedestrian crossings. For this site to be sound, also the 30% affordable housing SP must be rigorously implemented. Then this would be a sound and effective choice of site; conditional on the provision of all the services above, the reinstatement of the bus services cut in 2022 and conditional on 3 engineered cycle paths to connect to Aylesham and Snowdown Station, Shepherdswell station and Walmer rail station.

SAP 31 – 33 Eastry (cross referenced SAP 55 Woodnesborough) SAP32: 100 houses at Buttsole pond nature reserve (a small local biodiversity hotspot). The pond acts as a flood sponge as does the arable land all around it. Rudimentary geography suggests that if the arable land is replaced by a housing development there will be a dramatic increase in the run-off to the pond area. And the Landscape Sensitivity Assessment should have ruled this site as being unsound.

SAP 34 & 35 Kingsdown The selection of SAP 34 is totally unsound, The Highways Assessment of Ringwold Road is inadequate. The facts are that Ringwold Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5tonnes and unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

4 sections where the road narrows to single lane passing. The 1400 voters in Kingsdown village (population 2000 + 500? more in summer months due to holiday village + campsite) are all dependent on the Ringwould road traffic flowing freely. We have seen an RTA fatality on the road, and many near misses. It is a disgrace that KCC for years have refused to listen to requests to reduce the speed limit on this road and refused also to put in a kerbed pavement on the northern side of Ringwould Road. The economy of the village depends on visitors walking, cycling and horse-riding on the Ringwould Road and any development of SAP 34 would increase the likelihood of fatalities exponentially.

The inclusion of SAP 34 is not legally compliant with NPPF 2021 item 11. (b)ii *'SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'*.

Any development at SAP 34 is unsound **firstly** on the grounds of highways inadequacy. Any development would cause dangerous gridlock, involving the cars of current residents, parents of children of the village primary school, construction vehicles and new residents' cars. **Secondly** The selection of SAP 34 is unsound on the grounds that the Deal / Walmer conurbation of 30,000 depends on the narrow – single lane in places - Ringwould road, carrying diverted traffic from the A258 every time A258 is blocked by an RTA or road works. It is part of the transport infrastructure of the whole district. The A258 is the only southern entrance to the 30,000 conurbation starting in Upper Walmer. Diverted traffic is a dangerous nightmare for the village every time it happens, some diverted traffic uses Glen Rd / Liverpool road selected as site for SAP 15 Ray's Bottom in Walmer, this site too if developed is likely to mean diverted traffic cannot get in / out of Deal / Walmer 30,000 conurbation. Neighbours working for emergency services say they oppose both developments for this reason. Thirdly on the grounds of landscape character, the site is on the skyline with sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character and falls within LCT F3, Open Arable Chalk farmland with woodland, needed for national food security. The selection of SAP 34 is unsound **fourthly** on the grounds that it borders the AONB. Moreover 4.238 needs correcting, the parish council-owned, biodiversity-rich site of the Lynch / and Freedown woods (that run into Oxney Court Woods) was the subject of a survey by Kent Wildlife Trust in 2017 commissioned by the Ringwould w/ Kingsdown parish council and paid for by DEFRA, which provides evidence of the natural capital to be protected on the boundary of this site. The selection of SAP 34 is unsound **fifthly** on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station and pond which drains towards Rays' Bottom SAP 15, so development here could contribute to flooding (see CC5). (cross referenced SAP 15 Walmer Rays Bottom).

SAP 35 is also unsound in that it involves loss of food-producing farmland. It is also unsound given that it is in a BOA Biodiversity Opportunity Area. The selection of this site is unsound in that it contradicts the promises in SP4 3.71 about respecting the individual identity of villages and need to prevent settlements coalescing.

SAP 53 Ringwould The A258 is very dangerous for all Ringwould residents, there is no footbridge or pelican crossing with lights, over the busy A258 that runs through the village. It is a greenfield site on the boundary of AONB, as such the Landscape Sensitivity Assessment should have ruled out both sites. We also believe Ringwould is included in Landscape Character Type F – Open Arable Chalk Farmland with Woodland – described in Table 11.1 in NE 2.

SAP 36 & 37 Shepherdswell

SAP 38 – 40 St Margaret's at Cliffe (cross referenced SAP 46 East Langdon)

SAP 41 – 42 Wingham

SAP 43 – 45 Alkham & Capel

SAP 47 Lydden

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

SAP 48 Preston (cross referenced SAP 54 Staple)

SAP 52 Nonington

D&DGP Responses on Development Management Policies

DM 5 Climate Change

5.5 Unlike DDC we do consider local energy-efficiency standards stronger than those intended by the national government in its Future Homes building standards to be necessary and more sound and effective.

5.6 Building regulations and enforcement of planning conditions. In recent years in the district, it has taken sometimes years of pestering by dedicated members of the public to get DDC planning enforcement officers out to problems created by larger developers. So this policy will only become sound, effective, meaningful with a significant increase in the number of planning enforcement officers.

5.7 BREEAM 'very good' standard is the middle of their range, to be sound, the policy needs uplift to BREEAM 'excellent' or 'outstanding'.

CC 1 Reducing Climate Emissions

The local plan would become compliant with Legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008), if the steps we recommend in comment on SP1 were to be made requirements for all applicants, to note the transformation of existing homes into future-proof zero carbon home to lift residents out of fuel poverty and to mitigate climate crisis is a key measure.

CC 2 Sustainable Design & Construction

The local plan will not be compliant with Legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008), unless DDC adopts zero carbon homes standard. 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 nLP we find very weak.

We recommend this (closely based on ReadingBC Local Plan Adopted 2019 and Oxford City Council Local Plan adopted 2016). *'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 2023 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 40% 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). The requirement will increase from 31 March 2028 to at least a 50% reduction in carbon emissions. (based on Oxford City Council adopted local plan)*

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.

CC 3 Renewable and Low Carbon Energy Development

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

CC3 would not be sound without *'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).'*

CC 4 Water Efficiency

Would only become effective and sound if the following were added *'Given the unwillingness of Southern Water to admit that they are depleting water in our chalk aquifers and their unwillingness to agree to invest in new water collection infrastructure, and 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.*

CC 5 Flood Risk

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. To become sound the following should be added, *'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.*

The requirement for floor levels to be 300mm and 600mm above the flood level in Flood Zones 2 and 3 is likely to become inadequate, years before 2040 and so this requirement should be doubled to become more sound. (See also coastal flooding comments CC 7 and CC6 below).

CC 6 Surface Water Management

DDC is right to explain the needs*. Given the gross inadequacy of performance of privatized water companies, revealed in 2021 & 2022, an addition to policy should be made for the policy to become more sound and effective; additional criteria *(i) There should be public consultation with parish council and with residents living within 500 meters of the proposed development.*

A sound DM would be to insist that no permission will be granted unless developers contribute to sustainable urban drainage systems. https://en.wikipedia.org/wiki/Sustainable_drainage_system". Sustainable urban drainage systems being a mixture of both "hard" (physical infrastructure) & "natural" .

*Extreme weather events of climate change include heavy downpours and wetter winters. Arable and grazing fields, especially those on an incline, are vital as flood sponges and need protection. But sometimes the run-off is such that roads are flooded. Both Dover and Deal (Mill Hill) include steep hilly urban areas where residents have witnessed water gushing up more than one meter high from manhole covers, following sudden downpours because the very aged infrastructure is very inadequate. In lower lying streets near the Deal level crossing houses have often been flooded. A sound DM would be to insist that no permission will be granted unless developer is making a contribution to enhance infrastructure, culverts and drains, e.g. through Community Infrastructure Levy.

CC 7 Coastal Change Management Areas

We have grave doubts that the 2018 Assessment in the DDC evidence base is adequate, we note NPPF doesn't seem have been updated on this issue since 2012. Since 2018, with the rapid melting of the Greenland Icecap, scientific evidence is that the situation is deteriorating rapidly

<https://www.forbes.com/sites/davidbressan/2022/08/29/greenlands-melting-ice-sheet-will-cause-major-sea-level-rise/>

All along our coast there are homes, roads and other services close to the pebble beaches, at risk of rising sea levels. This plan would become more sound if any applicant planning a development of over 20 dwellings within 750 metres of the highwater shore line, and at an altitude of under 12 metres should expect to contribute to the cost of replacing groynes on our beaches / recharging beaches with shingle. The Goodwin Sands provide a natural protection from

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

coastal erosion. As such the Goodwin Sands need protection too and should never be used as a source of gravel, they should never be dredged.

CC 8 Tree Planting, RETENTION and protection

This policy would become sound, effective and legally compliant, if the recommendations of KCC report '**Natural Solutions to Climate Change in Kent**' of March 2021, paid for from the public purse, on the need for our district's (chalk) grasslands, wetlands, and woodlands to be retained and enhanced, were adopted as a planning guideline.

We recommend that the points made be strengthened to become requirements. Also to become sound and effective CC8 needs the addition '*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, non-compliant with legality, 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.*

Experience has caused trust in the planning process to expire in the minds of many of the public. Without independent, robust auditing, and honesty, extracting promises from developers all too often results merely in employment for public relations practitioners. So, an addition to CC 8 is needed for it to become sound. 'Where permission is given subject to conditions regarding tree retention, tree planting and / or biodiversity enhancement, applicants will need to agree to abide by 'robust auditing' (as Wildlife Trusts insisted that the Environmental Bill legislate for). This means that honest, objective, before-and-after evaluations / baseline measurements must be used. DDC councillors on the planning committee have in recent years pointed out how very inadequate and misleading the sketchy, google-map-based ecology reports paid for by developer applicants are. Developers are ill-placed to self-certify their own work in this area, and DDC need a DM policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.'

DM 6 Place Making

PM 1 – 4 and 6 The statements here are sound. Experience indicates that only a bias in favour of public transparency, full consultation with the public and community organisations, and more effective democratic accountability will ensure that powerful, influential, high-profit developers do not cause the statements to be circumvented. [A fifth of Tory party donations from property sector | News | Housing Today](#) The vast majority of the electorate want cleaner, less lobby-laden government.

PM5 Protection of . . . Local Green Space One glaring omission is Betteshanger Country Park formerly Fowlmead. This site was formerly publicly-owned by SEEDA and under SEEDA, designation as Local Nature Reserve was applied for in 2004, but the application got lost. Then the now defunct Hadlow College took it on until their financial problems caused the current developer to snap it up. The site has long been designated as 'low key recreation' by DDC.

The site has rewilded over 30 years and DDC planning portal holds evidence (applications 22/01158 and 22/01152 refer) of how Kent nature / wildlife-concerned NGOs and the Kent Recorder, agree this is a well-loved biodiversity hotspot, a habitat of a number of endangered species. As such, all this site must be designated as a **Local Green Space** for the Plan to become sound and effective.

DM 7 New Homes

H 1 7.1 To become sound and effective the statement needs to be amended so that it reads 'increase choice by providing substantially more social rented council houses' and also widen opportunities for home ownership'.

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

7.3 The percentages cited are strange and unsound given that most of the population increase expected is due to aging population and smaller households are needed. High profit developers want to build 4 bed exec homes, which also sell as investment; is this why the overall mix sought is 35.2% three bedroom and 32.2% 4 or more bedroom properties? The statement would be more effective and sound with a higher percentage of 1 and 2 bedroom houses.

7.4 Sound

Type and Mix of Housing – Affordable Housing As stated above on Strategic Policy 5, we and most residents 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 4 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.* It would be better if 'affordable housing' were genuine rather than including the Equity grabbing half sales for the over 50s.

7.9 We note some small DDC council house developments in Rokesley and Middle Deal wards, but these are nowhere near enough. This would be more sound if PWLB cheap loans were accessed to build 5 – 10 times as many (40 x 10 = 400) new council homes, covenanted so that they (or at least the freehold) would remain publicly owned in perpetuity and available to those who cannot manage home ownership. Social housing tenants should be protected from fuel poverty by building zero carbon, this would make policy more compliant with legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008). Some of the Affordable Dover Town provision needed, should be low rise apartment blocks, between three and five stories high. With balconies, decent floor space for the occupants, good quality design, and with trees to cool. Many people don't have time for gardening and these sort of homes will help build a "15 minute" neighbourhood; one where people can meet most of their needs within a quarter hour walk.

H2 Rural local Housing Needs. (cross ref with E4 below) It is very unsound, for DDC to fail to make AirB&B owners register with them, so that they can be charged Business rate council tax. In terms of housing provision, AirB&B both nationally, and in Kent's coastal / rural towns especially, have a very negative effect of reducing the private rental market and thus forcing up the average monthly rents for private tenants, while we have a cost-of-living crisis.

7.13 Sound. More sound with the addition, *'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'.*

H3 Needs of Gypsy & Travellers and H4 Gypsy and Traveller Windfall Accommodation. [Sound.](#)

H5 Self Build and Custom House Building. Would be more sound if residents undertaking zero carbon / low carbon self build were supported or incentivised.

H6 Residential extensions and annexes. To become sound the following should be added *'There should always be thorough and meaningful consultation with local residents. With the recent overdevelopment and very congested roads in our coastal towns, impact on road network and road safety should always be assessed'.*

H7 Houses in Multiple Occupation To become more sound and effective and safe the following should be added, 'd' Assessment of the safety of utility connections (electricity and gas) should be made and evidence provided of the assessment (e.g. by UKpowernetworks) to DDC before permission is given.

DM 8 Employment and Local Economy

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

E1 This would become sound and compliant with legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008), if following added, **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.

More sound if floor space under solar panelled roofs incentivized, with lower business rates.

Also more sound with the addition of *'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.* 8.10 Sound.

Employers who are the SMEs in our coastal towns and villages struggle to survive in Nov 2022, because of shortage of staff, and sky-high energy prices. So it would make sense to help existing SME employers survive by directing them to rock-bottom loans to install solar roof panels, so that they became more self-sufficient in energy during daylight hours.

E2 & E3 Conversion or rebuild of rural buildings for Economic Dev. Purposes. This minor accommodation is welcome, allowing indoor office space. It would become more sound if there were protection of outdoor farmland and woodland as locations of employment; There is a need for both office space and also fields / woods / reactivated coppicing sites or sites of agri-forestry ; all serve economically productive purposes.

E4 Tourist Accommodation and Attractions It is very unsound, for DDC to fail to make AirB&B owners register with them, so that they can be charged Business rate council tax. In terms of housing provision, AirB&B both nationally, and in Kent's coastal towns especially, have a very negative effect of reducing the private rental market and thus forcing up the average monthly rents for private tenants, while we have a cost-of-living crisis. It is unsound for DDC not to cause all private landlords to register with the council, so that DDC could promote to private landlords, schemes allowing them to protect their tenants from the worst of fuel poverty, enhance the intrinsic value of their properties, and provide employment for newly qualified tradespersons in insulation skills graduating from EK Colleges, especially Dover College (FE).

Green tourism, and 'safe' country lanes, are East Kent assets that it would be very unsound to trash.

The local plan would be more compliant with Legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008), if DDC regeneration took the greening of the economy more seriously and looked at smaller zero-carbon transport activity projects within Dover 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 15 years).

Economic Growth in Dover, a coastal town aspiring to attract tourists, would be unsound unless it included trebling the number of toilets installed. Tourists as well as residents 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 inhabitants to toilet blocks 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 5 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.

DM 9 Retail and Town Centres (See comments in E4 above)

R1 Primary Shopping Areas

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

R2 Sequential Test and Impact Assessment

We note statement 'town centres . . . the most sustainable locations, easily accessible by modes of travel other than the private car.' More sound if the recommendation about SMEs and electric hopper buses (our comments E4 above) incentivized. To note E1 above, on floor space / new employment could include out-of-town park for hopper buses with solar canopy so proportion of electrical charging for hopper buses from direct solar.

R3 Local Shops and their protection.

R4 Shop Fronts

DM 10 Transport and Infrastructure

We have commented above on specific SAPs where the Highways Assessment is inadequate and the reality on the ground is different. This being the case, the Plan would not be sound or compliant with the Localism Act 2011 if local parish-wide public consultation on travel impact of all developments over 15 dwellings were not required.

TI 1 Sustainable Transport and Travel

TI1 would not be sound without : *"All new homes must 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, must be more than a painted line on the road surface (Badly painted lines can be fatal). Also to be to be rendered more sound 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."*

TI 2 Transport statements, Assessments and Travel Plans

*This DM would become more sound if 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, especially as regards SAP 1 Whitfield Urban Expansion, SAP 24 & SAP 25 Aylesham and SAP 28 Elvington and Eythorne. The separation needed must include flyovers and underpasses for local traffic at the Whitfield Roundabout (fatality Oct 2021) and the Duke of York roundabout.

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 rail station. 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.

(cross referenced with NE 4 Air Quality) Air pollution is exacerbated in 2022 because KCC have stopped subsidising buses and some rural bus routes have disappeared or been reduced (e.g. Elvington). Level 1 councils and Kent Ass of Local

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

Council are looking to have a stronger voice on Joint Transportation boards so that they are able to help residents with public transport and thus respect Kent and Medway Energy and Low Emissions Strategies. It would be sound if no new builds were allowed in villages without bus links to schools and workplaces, unless conditional on funding of bus services.

TI 3 Parking provision on new Development

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, and in some congested coastal town sites, 1 car per dwelling.*

TI 4 Overnight Lorry Parking Facilities

This would become sound and compliant with legislation coming forward in parliament regarding Air Quality, with the addition (h) sites within 300 metres of a residential street or of a school or preschool will not be approved for Lorry Parking.

TI 5 Digital Technology Sound; viz our comments on co-working spaces above. (There are areas of the district where 'superfast broadband' connections are so slow that residents have been preventing from accessing the local plan consultation portal).

DM 11 The Natural Environment

(See our comments on SP13 and SP 14 above; we note improvements since Reg 18 consultation) Landscape Character Types, 17 identified. To become sound there should be an addition. The area inland from Kingsdown, west to Ringwould, Ripple, Sutton, Studdal and Little Mongeham should all be included as LFT F Open Arable Chalk Farmland with Woodland, as an extension to F3 Ripple.

11.20 Tilmanstone Colliery Tip should be landscaped to become a local nature reserve and an amenity of Elvington and SAP 28.

NE 1 Biodiversity Net Gain

(see comments in SP14, and SP13 above) To become sound, effective and legally compliant with 2021 Environment Act this addition 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.*

Experience has caused trust in the planning process to expire in the minds of many of the public. Without independent, robust auditing, and honesty, extracting promises from developers all too often results merely in employment for public relations practitioners. So, an addition to NE 1 is needed for it to become sound. 'Where permission is given subject to conditions regarding tree retention, tree planting and / or biodiversity enhancement, applicants will need to agree to abide by 'robust auditing' (as Wildlife Trusts insist that the Environmental Bill legislate for). This means that honest, objective-because-independent, before-and-after evaluations / baseline measurements must be used. DDC councillors on the planning cttee have recently pointed out how very inadequate and misleading the sketchy, google-map-based ecology reports paid for by developer applicants are. Developers are ill-placed to self-certify their own work in this area, and DDC need a DM policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.'

NE 2 Landscape Character and the Kent Downs AONB

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,

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

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 whose have the ear of London ministers, would be shooting ourselves in the East Kent foot, and cost us dear. This Local Plan would be unsound if it allows any development within the AONB, **or allows any development over 5 dwellings within a mile of the boundaries of the Kent Downs AONB**. Food security is a key concern in 2022 and the public expect food producing, carbon capturing soils and farmland to be protected.

The Landscape Character Types (LCT) are a sound and helpful classification. Two amendments that would make Table 11.1 more sound and effective would be: for there to be a commitment to protect and expand Horticultural Belt LCT D in north of district, especially for pesticide-free, Nature-Friendly farming enterprises (see our comment SP 6) ; and for LCT F Open Arable Chalk Farmland with Woodland – F3 Ripple to be expanded to include all land west of Kingsdown village in a 3 mile band, to include Ringwould, Ripple, Sutton, Studdal, Little Mongeham to Northbourne and Tilmanstone.

NE 3 Thanet Coast and Sandwich Bay SPA mitigation & monitoring strategy.

The Plan is sound in including the aim *‘to deliver mitigation and monitoring contributions from new development within a Zone of Influence of 9km from the Thanet Coast and Sandwich Bay SPA is therefore considered appropriate to deliver the Council’s legal responsibilities to protect this environmental site and its qualifying species and is set out’*

The contribution rates specified are : per dwelling 1 bedroom unit £112, 2 bedroom unit £224, 3 bedroom unit £337, 4+ bedroom unit £449. To become genuinely effective we recommend at least double this and a greater increase for the additional persons likely to be found in a 4+ bedroom unit of, for example £1000. This money to be ring-fenced for direct projects to support the wildlife of the Thanet Coast and Sandwich Bay SPA.

NE 4 Air Quality

Predicted traffic congestion during holiday periods, which at key holiday departure times becomes gridlock, is likely to increase not decrease, as EU Schengen area brings in biometric passport checks in 2023 for non-EU traffic. So we fear gridlock impacting well-being and livelihoods, not only in Dover town and Aycliffe but also on villages around A2, A20 roundabouts (Guston, Whitfield). This leads 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, Dover Town A256 Barton road by Barton School, DGGs & Charlton School, at Aycliffe, in Guston, on the Duke of Yorks roundabout near DYRMS school, on the Whitfield roundabout.

There are Air Quality issues on both one-way A256 roads in Dover (London Rd and Barton Road / Maison Dieu Rd - see comments in SP 8 above) and there is an urgent need for vertical living walls, urban hedging to absorb air pollution for residents and school children along these road, especially in view of the Air Pollution laws coming through parliament now, in order for Plan to become legally compliant. These should be a requirement on any application for residential, non-residential development and for change of use, within Dover town.

Air pollution is exacerbated in 2022 because KCC have stopped subsidising buses and some rural bus routes have disappeared or been reduced (e.g. Elvington). Level 1 councils and Kent Ass of Local Council are looking to have a stronger voice on Joint Transportation boards so that they are able to help residents with public transport and thus respect Kent and Medway Energy and Low Emissions Strategies. It would be sound if no new builds were allowed in villages without bus links to schools and workplaces, unless bus links were provided, so the statement re Initiatives which ‘encourage’ public transport needs strengthening to become sound.

NE 5 Water supply and quality

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

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. Since the Reg 18 Consultation in early 2021, the issue of river contamination at Stourmouth and Stodmarsh caused by inadequate sewage infrastructure upstream has peaked. Residents are very aware of the problems caused by Southern water failing to invest in either new water collection infrastructure or in adequate treatment infrastructure.

This DM will not be unless robust, stringent and measured enforcement of adequate water treatment for all new build sites are required, as well as rainwater harvesting. 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.

NE6 The River Dour Sound now improvements added.

DM 12 The Historic Environment

HE 1 Designated and Non-designated Heritage Assets To note: the 2022 cuts in Kent Police funding of £30million and the cuts to PCSOs is likely to result in an increase in crime affecting all assets including heritage assets.

1 We recommend adding the following : 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.

2 The DM policy would be more sound if strengthened by explicitly requiring 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.**" affected. The whole building approach to developments involving energy conservation improvements sound.

3 We recommend adding the following : 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.

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.

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:

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.

HE 2 Conservation Areas : The wording would be more sound if strengthened thus : 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.**”

HE 3 Archeology We suggest this section needs the addition of: 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.”

HE 4 Historic Parks and Gardens Sound.

- **Response to Appendix C Local Plan monitoring Indicators & Appendix F Local Plan Policies; Supporting Documentary requirements for planning applications**

Experience has caused trust in the planning process to expire in the minds of many of the public. Without independent, robust auditing, and honesty, extracting promises from developers all too often results merely in employment for public relations practitioners. So, additions to SP13, SP14 and DM policies NE is needed for it to become sound. ‘Where permission is given subject to conditions regarding tree retention, tree planting and / or biodiversity enhancement, applicants will need to agree to abide by ‘robust auditing’ (as Wildlife Trusts insisted that the Environmental Bill legislate for). This means that honest, objective-because-independent, before-and-after evaluations / baseline measurements must be used. DDC councillors on the planning cttee have recently pointed out how very inadequate and misleading the sketchy, google-map-based ecology reports paid for by developer applicants are. Developers are ill-placed to self-certify their own work in this area, and DDC need a DM policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.’

END

Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022.