

St Margaret's at Cliffe Parish Council objections to DOV/21/00936

This application follows a similar application (16/01028) that attracted a high level of objections from the community although the application was withdrawn before the Parish Council could submit its views.

The Parish Council now sets out its range of objections to 21/00936.

Background and history of the site.

The site known as the Glebe Field (or St George's Field in DDC list of Open Spaces) has been used for community purposes since the late nineteenth century.

What is now known locally as The Glebe Field or Glebe Meadow was originally part of a larger plot of land owned by the church. In the late 19th Century, a large 4-bedroom Vicarage was built on part of the land and regular village fetes and bazaars and celebrations were held in the Vicarage gardens and on the Glebe Field. In 1902 the first Parish Hall was built on the land and this part of the village became the centre for both indoor and outdoor communal village activities with convenient facilities at the hall to support events held in the field.

By the time the Vicarage was sold in 1984 all communal outdoor activities had long since moved to the Glebe Field. When Sir Fred Cleary's St Margaret's Bay Trust bought the Glebe Field from the Church in 1972, he consistently pledged to retain the majority of land for local recreational and community use. In his autobiography Sir Fred described how the Trust bought the land to protect it for recreational use. In the April 1972 edition of the local Parish Magazine he contributed an article in which he confirmed intent to protect the land: *This land is now preserved for ever and the Trustees have let the land to the Church Council at a nominal rental.*

There is substantial photographic evidence that the amenity has been used for village events such as fetes, sports and maypole dancing from 1911 when there were celebrations of King George V Coronation to the last fete in 2013. The Scouts Group regularly used the field until 2015 when the Bay Trust fenced off the site. In that year an ACV was granted but this expired in 2020.

This year the applicant held a very brief, online only consultation with the community. The published results indicate that out of 299 replies over 90% gave strongly negative responses. The planning application claims, in the Design and Access Statement section on consultation, that in 2012 the Parish Council was "fully supportive" of a scheme to build on St George's Place/ Glebe Field. But this was a very different proposal to 21/00936 as it only suggested a terrace of dwellings opposite the existing St George's Terrace and it left the major part of the Glebe Field untouched and so available as a community amenity. The Parish Council has never supported any scheme for housing on the Glebe Field itself.

The evidence of regular use, together with the large number of objections from residents to this and the previous application, demonstrates the value that the community at large places on this area of open space and should in itself warrant protection.

Status of the site

The site is designated open space and is protected by Policy DM 25 of the Core Strategy. The site's value lies in its contribution to the Green Infrastructure Network, to visual amenity in the village, to cultural and social heritage and to the protection of the setting of the AONB.

Dover District Council Authority Monitoring Report 2019-2020 provides an annual update of housing land supply and sets out the Council's position in relation to future housing land supply in accordance with NPPF. It states: "Using net housing figures, the assessment demonstrates that at 1st April 2020 the Council had a five-year land supply. At that point in time, there was 6.16 years of supply which equates to a surplus of 728 dwellings once an additional 5% buffer has been taken into account to ensure choice and competition in the market for land". Due to the Glebe Field site's current protected status and open space designation and in the absence of any compelling or demonstrable need to release more land for housing in the village, development of this site for housing would depart from the Development Plan. The release of the site from protected status and its removal from the Green Infrastructure Network would result in a deficiency of this type of open space in the heart of the community.

Open Space Assessment

The applicant makes reference to The Dover District Council Open Space Assessment, December 2019. This report was commissioned by the DDC and prepared by Consultants on behalf of the Council. It is noted that the same Consultants also prepared the report in support of the current application and this calls into question the value of this report. The Assessment document does not feature on the Council's website and, as noted by the Planning Inspector in the recent Marlborough Road, Deal appeal, it should be awarded limited weight (paragraph 14 of Appeal Decision). The Inspector also stated in his dismissal of the appeal that the fact a site is privately owned and fenced off does not preclude it from listing as a protected open space.

The Applicants have referred, in their application, to the adopted open space standards and methodology. But this applies only to 'accessible green space' as set out in paragraphs 1.25-1.28 of the Land Allocations Plan. The site is no longer publicly accessible. Accordingly, the application for housing should be determined on the basis of compliance with criterion vi of Policy DM25 of the Core Strategy. The application claims that there are sufficient other open spaces for the community. But the nearest are the King George V Field and Reach Close and neither is suited to hold the scale of public events that have used the Glebe Field in the past. The King George V Field is a cricket ground and used throughout the summer. Reach Close is open space for the residents of this housing estate and has a road running through its centre. Other sites mentioned in the report are beyond 300m distance. Therefore the Parish Council believes that the evaluation of the Glebe Open Space in the application is flawed and should be rejected. The Parish Council strongly refutes the applicant's claim that the open space is surplus to requirements.

Housing Development

The Parish Council believes that the proposed housing development of 14 dwellings is inappropriate in this location. It would create an urban type development

out of character with the rural street scene.

The Core Strategy 2010 Policy CP1 Settlement Hierarchy provides that villages, such as St Margaret's at Cliffe, are a tertiary focus for development. Major sites (10 or more dwellings, according to DDC Statement of Community Involvement 2019) would ordinarily only be acceptable through a plan led approach or review of the local plan and call for sites. They would not normally be brought forward through the development management approach unless the site is allocated for this purpose, which it is not. As a "major site" application it cannot be described as "windfall development" which is defined by DDC as developments of up to five dwellings.

Residents' parking spaces are provided in the design but there is limited visitor parking, which would likely be in St George's Place. Whilst Kent County Council Highways and Transportation has raised no objection to the proposal, the impact of the development will result in a significant loss of on street spaces in St Georges Place (due to the new entrance, enlarged turning head and parking spaces directly off the road) and the proposed development would in practice result in overspill parking in St Georges Place causing significant impact on St Margaret's Village Hall. St Georges Place is regularly used for parking by those attending Village Hall events. This is material to the determination of the application.

The proposed Dover Local Plan has identified three other sites in St Margaret's for housing development and the Parish Council believes that these are likely to be more suitable than development which causes the loss of the Glebe Field.

Green Infrastructure Network

Prior to the application for housing development in 2016, the site was of high visual quality and was freely accessible, being used frequently by the Scout Group since the 1960s and in this regard contributed significantly to the District's Green Infrastructure Network and supported the aims and objectives of the Core Strategy. Historic use of the field reflects its value as a social, cultural and visual amenity. The Parish Council wishes to restore these attributes for future benefit of the community.

It is uncertain at this stage whether the proposed method of construction, outlined in the application, is sufficient to mitigate tree loss and whether the proposed method would be adhered to during the construction phase if development was to progress. However, of greater concern are the effects on the visual amenity arising from the loss of ten trees to accommodate the development and potential loss of further trees during the construction phase. Coupled with the loss of green space and infill of the site with buildings and areas of hardstanding, the effects are likely to be significant. The Parish Council believes this would result in harm to this valuable environmental asset.

Given the sensitivity of the surrounding landscape character, the infill of green open space and consequent loss of trees and vegetation is likely to harm the key relationship between the village, surrounding topography and the AONB. To protect the setting of the AONB it is therefore important that trees and public green spaces are retained as far as practically possible since they serve to facilitate the integration of the built fabric and surrounding landscape. The Parish Council believes the proposal is contrary to Policy DM 16 on grounds that is harmful to landscape

character and will result in undesirable visual impacts that will affect the setting of the AONB.

Core Strategy policy DM25 Open Space

Applications 16/01028 and 21/00936 have generated a very high level of objections from the community and the Parish Council has received many representations which oppose any building on this site and wish to see it preserved as open space, as intended when St Margaret's Bay Trust originally bought the Glebe Field. Accordingly the Parish Council believes that the relevant test against which the proposed development should be determined is criterion vi of Policy DM25 of the Core Strategy. This requires the Applicant to demonstrate that the site has no overriding visual amenity interest, environmental role, cultural importance or nature conservation value. It is not enough for the Applicants to claim that since the site is no longer accessible to the public and can at present no longer be used by villagers, it has no value and is thus surplus to requirements. The site holds meaningful purpose to the local community and contains many important attributes. These are:

- 1) The site is of social and cultural value locally. Its retention as protected open space is necessary to ensure the longevity of its social and cultural value (as per previous ACV listing).
- 2) The site forms a valuable area of unmanaged natural grassland in the heart of the village. It contributes significantly to the District's diverse network of Green Infrastructure and its natural state serves only to increase net biodiversity in the village.
- 3) The site is considered locally to enhance the rural /village character of the area and for this reason is highly valued. The site contributes significantly to local visual amenity and to health and well-being. If protected, the site could continue to serve and benefit those who live in the village. The Parish Council has offered to acquire the site from the owner and manage it for the benefit of the community.
- 4) The site serves to protect the setting of the AONB and to prevent uncharacteristic urbanisation of the village.

For all of the reasons outlined above the Parish Council strongly objects to application 21/00936 and believes it should be refused.