

St Margaret's at Cliffe Parish Council

Response to Dover District Council Local Plan Regulation 19 Consultation

The Regulation 19 Plan includes four sites for housing development in this village. Three were listed as selected in the Regulation 18 Plan document; STM003, STM007- STM008 (on same site) and STM006. But a fourth, STM010, listed as considered, was added to the Regulation 19 document. This came too late in the Regulation 18 consultation stage for the Parish Council to assess, indeed the PC only learnt of the inclusion when the Regulation 19 document was published. Therefore we question that the inclusion of this site has followed due process.

The Parish Council accepts there is a national need for more housing and there is a community need for affordable housing. But the selection of four sites in this Parish for non-strategic housing development that could add up to 96 dwellings appears excessive for a village of this size and in this location.

All of the sites are in the Kent Downs AONB, which surrounds St Margaret's, and are close to the Heritage Coast. If all sites are developed this will represent a substantial loss of protected landscape. Both the NPPF and the Dover Local Plan policies attach the highest level of protection to such areas and "*require that great weight is given in the planning process to conserving and enhancing the landscape and scenic beauty of Areas of Outstanding Natural Beauty*" (Strategic Policy SP4) .

Strategic Policy SP14 – "Enhancing Green Infrastructure and Biodiversity" states: *Development should ensure that the integrity of the existing network of green infrastructure, including the hierarchy of designated sites, the Local Nature Recovery Network and Biodiversity Opportunity Areas across the District is strengthened as part of proposals, in order to increase the contribution to health and wellbeing, carbon sequestration and resilience to climate change delivered by such green infrastructure.*

Policy NE2 "Landscape Character and the Kent Downs AONB" states "*Major development proposals within the AONB will only be permitted in exceptional circumstances and where it is demonstrated they are in the public interest*".

These statements appear to be disregarded in the site allocations for St Margaret's.

The NPPF and Local Plan policies require any development in such areas to provide mitigation measures to avoid harm to the landscape. The Parish Council believes it could be more difficult to provide effective mitigation than the Local Plan site policies envisage.

SAP38

This proposes a development of up to 40 dwellings. It is adjacent to Roman Way which currently borders this part of the settlement of St Margaret's at Cliffe and will be affected, in particular by loss of views of the AONB and the South Foreland Heritage Coast. Paragraph a) of this policy states that the design must be sensitive to the location. As Roman Way is comprised mostly of bungalows and chalet

bungalows, any new development should be restricted in height to single storey dwellings.

The Landscape Sensitivity Assessment (2021) rates this location as medium vulnerability. It notes it has high susceptibility to harm in terms of landscape role, views and visibility and AONB value. This suggests that it will not be easy to provide mitigation measures, particularly of views from the Holiday Park across the Downs to the Heritage Coast and National Trust land. It should be noted that the National Trust has invested significant financial resources to restore the coastal landscape between St Margaret's and Dover from arable land to natural chalk meadow and major development on this site will not contribute to that aim.

Together with requirements in subsequent paragraphs for landscape buffers and biodiversity habitat creation, this could affect the viability of this site for housing development as they will not be easy to design in. Strategic policies in this Local Plan also require public amenity spaces to be provided in a development of this size, further adding to the limitations of the site. The requirement for 30% affordable housing (up to 12 dwellings) also applies here.

Paragraphs d) and e) require the developer to provide a pedestrian access to Reach Road and "pram crossings" at 4 locations along Reach Road. Given the increase in vehicle traffic the development is likely to produce, these conditions are very welcome and would benefit all local residents.

SAP39

This proposes a development of up to 36 dwellings across sites STM007 and STM008 which are contiguous. Access is via Townsend Farm Road which is narrow and the policy recognises that some widening and reconfiguration will be necessary. This will not be possible in the section of road near The High Street as there is housing on both sides. The requirement for 30% affordable housing applies, that is up to 11 dwellings.

Paragraphs a) and b) of the policy require the design to be sensitive to the AONB location and to provide landscape buffers in mitigation. As development on this site will affect views of the AONB from Townsend Farm Road, Meadow View and Ash Grove, the mitigation, in terms of dwelling height and spacing and green buffers to the North and West, needs to be substantial if the impact on the landscape is not to be harmful. The Landscape Sensitivity Assessment for this site of low susceptibility to harm may not fully recognise its rural value.

Paragraph f) requires pedestrian improvements in the form of "pram crossings" at Townsend Farm Road near The High Street. The Parish Council believes the condition should go further, as in d) and e) of policy SAP 38, to require "pram crossings" to be provided in the High Street. A development of this size can be expected to add a number of children of primary school age to the village population and these will have to cross and walk up the High Street to get to St Margaret's Primary school. This road has a traffic density of over 400 vehicle movements per hour in daytimes and serious safety issues at several points. The addition of pedestrian crossings would make it much safer for families and all residents.

Paragraph i) requires a Heritage Assessment. It is believed there could be substantial Saxon remains below the site and that an Archaeological Study should be carried out. This could add significant costs to development on this site.

The conditions attached to SAP38 and SAP39 are considerable but necessary to mitigate impact on the AONB. The Parish Council believes these conditions must be strictly applied but has doubts about the economic viability of the sites if these and other required conditions in the NPPF and Local Plan, such as the need to promote biodiversity, are imposed.

SAP40 STM006

This policy proposes 10 dwellings at the base of the dry valley between St Margaret's at Cliffe and Nelson Park settlements. It is listed as suitable for "executive homes". However, the site is in a Designated Rural Area and therefore must provide at least 30% affordable housing, or 3 dwellings in this context.

The policy mentions a speed survey. This is required because the access to and from the site joins Station Road which has a 60mph limit at this point. The sides of the valley are steep and as the site is in the dip between two hills this tends to be the place where vehicles travel fastest.

Similar to policies SAP38 and SAP39, there is a requirement for any development to be sensitively designed to avoid harmful impact on the AONB and to include mitigation measures such as buffers to reduce harm on the landscape, as well as enhancement of biodiversity.

The Parish Council has doubts that housing development will be viable if these conditions are properly applied.

SAP40 STM010

This policy proposes 10 dwellings on this site which is a reduction in the number indicated in the considered category (orange) in the Regulation 18 document. The manner in which this site was added to the Regulation 19 consultation is a cause of concern for the Parish Council. It is subject to a specific objection by some members of the local community.

Although a look at a map might suggest this proposal is just a form of limited infilling between Salisbury Road and The Drove way a closer look at the topography of the area reveals this is not the case. The site is at a higher level than either road so any housing development here would be particularly prominent.

The existing open field, lined by trees on two sides, serves well to integrate the existing settlement into the AONB. The Landscape Sensitivity Assessment rates this site as low to medium sensitivity. But it completely fails to take into account its proximity to one of the most sensitive parts of the AONB in this Parish. This includes the nearby Dover Patrol Memorial, which has international significance as it is one of 3 such monuments, the other 2 being in France and New York. It is a very popular

place for visitors and walkers who can enjoy the view from this high point on the cliffs across the village to the Bay. It also includes the special landscape area of National Trust land, the Site of Special Scientific Interest (SSSI), the Heritage Coastline and the Biodiversity Opportunity Area. This site is in a far more sensitive position than STM02 which has been rejected. In addition to this there are public footpaths around three sides of this site which connect to the special landscape area.

Any development on STM010 would stand out from the surrounding settlement. It is claimed it is only at a slightly elevated level but the photo shown in the Landscape Sensitivity Assessment demonstrates that the site ground level is at the roof height of the visible house in the adjacent road.



At its centre the land is several metres higher than the adjacent roads. Housing here, even bungalows, would be obtrusive when viewed from the AONB and therefore harmful to the landscape character. It is suggested that in mitigation the trees that line the boundaries with The Drove way and Salisbury Road should be retained and tree buffers could be added to other boundaries. But this would enclose the site in a rectangle of trees, elevated above the adjacent housing. It would appear very un-natural when viewed from the AONB and harm the integration of the settlement with the Green Infrastructure Network. Furthermore, the elevated level of this site would offer any housing built near the Salisbury Road boundary potentially fine sea views, or on The Drove way side views across The Downs, so it's virtually certain that any developer would seek to remove these lines of trees, particularly as in this part of the village nearly all the existing housing comprises very high value dwellings. It is unrealistic to expect any developer to build housing at a high point on The White Cliffs of Dover that has all views constrained by lines of trees. Therefore mitigation would be very unlikely to be delivered.

Local Plan Policy NE2 sets out four criteria to be met for any development in the AONB. These are:

h Development is sensitively located and designed to avoid or minimise adverse impacts on the AONB and its setting;

i The location, form, scale, materials and design would conserve and where appropriate enhance or restore the special character of the landscape;
j The development would enhance the special qualities, distinctive character and tranquillity of the AONB and the Heritage Coasts; and
k The development has had regard to the AONB Management Plan and any associated guidance.

None of these appear to met for this site.

The Landscape Sensitivity Assessment accepts that in terms of views and visibility and AONB value there is high susceptibility of harm but concludes there would not be significant landscape/visual change. For all the reasons given we disagree strongly with this conclusion and maintain this site should be removed from SAP40.

T13 - Parking Provision on new Development

Policy T13 represents an opportunity missed. It retains the 2006 KCC parking standard which for rural areas is obsolete.(That is, 1.5 spaces for one and two bedroom dwellings). Car ownership in villages has increased substantially in the past 20 years and is leading to congestion and parking problems in many rural roads. The cause is the poor and reducing provision of rural public transport which is inadequate for commuting to work. For example, a young couple move into a 1 bedroom dwelling in the village but as they work in different towns and cannot get to and from work by public transport they need 2 cars. Larger families, where the grown up sons or daughters have to live at home, may require 3 or 4 cars to enable travel to work. The parking provision policy urgently needs updating to match demographic development and for rural areas should be 1 space per bedroom. Therefore we object to this policy.