

THE PARISH COUNCIL OF ST MARGARETS-AT-CLIFFE

Minutes of the Ordinary Monthly Meeting of the above Parish Council held on Monday 14th November 2022 at 7pm at St Margaret's Hall.

Present : Cllrs Rebecca Simcox (in the chair), A Newton, A Fielding, P Blake, J Harris, G Simcox, T Gilham together with Clerk. County Cllr Steve Manion also in attendance.

Public Participation:-

Following recent changes and removal of some buses to the village, a question was raised as to why the no. 81 bus cannot turn at the Westcliffe junction as this would only be a small diversion.

Resident raised a point that the traffic management plan for the planning application for Brown Cottage may cause disruption and that Foreland Road may be disadvantaged - could contractor vehicles park on the property site? One resident responded that this had not caused a problem during previous construction works at the property.

Peter Wells - noted that the traffic queueing at the A258 junction from the village is getting worse and raised the question of a roundabout at this junction.

David Hall - noted that the flooding on Reach Road continues. Cllr Gilham stated that he had met with KCC engineer on site and will continue to press for improvements. Mr Hall noted that although some hedge clearance had taken place on Upper Road by Kent Highways, further work is needed.

Sheila Vines - when exiting St Margarets Road, it is difficult to see traffic travelling up Bay Hill owing to vegetation alongside the railings into the road. Clerk will report.

1. The minutes of the Parish Council meeting of 10th October 2022, having been circulated to all Councillors, were confirmed as a correct record of the meeting.	
2. Cllrs Fielding and Blake both declared a personal interest in the agenda item for the White Cliffs Hotel under Planning.	
3. <u>County and District Councillor Reports</u> County Cllr Steve Manion - confirmed that he is aware that St Margaret's has been badly affected by recent changes/removal of buses; he is very aware of the impact on school children and the elderly who rely on these services. Question raised - can buses go to at least Walleys Court/Dover Road? Cllr Manion advised that people are able to use the Kent Karrier service, although this has to be booked as a dial-a-ride service (normal joining fee has been waived). He advised that KCC is still subsidising some services, although he advised that all local authorities including KCC are struggling financially. Cllr Simcox raised the question whether any buses to St Margaret's are subsidised but this would not appear to be the case. Clerk asked to investigate when new timetables are being published / put up at bus stops?	Clerk to deal

Chair allowed Maria to speak re local bus service - she advised that given the reduction in later buses from Deal, she was aware of at least one person who would have to give up their job. Cllr Manion advised of the possibility of parishes commissioning their own service but the Chair felt this was unworkable. Maria asked if a petition would be worthwhile and this is something she may pursue

Clerk asked to write to MP Natalie Elphicke stressing the PC's disappointment in the reductions.

Cllr Manion was asked how the village could achieve a roundabout at the A258 junction but he advised this could only probably be taken up following a large housing development.

District Cllr Martin Bates - report attached to minutes.

Clerk to write

4. Clerk Report

- Christmas trees will arrive on Friday 2nd December.
- Cleaning of Alexander Pavilion undertaken - £300 paid.
- John Muir fixed problems with heaters at Alexander Pavilion - invoice paid.
- Exit from car park re overhanging trees and potholes reported.
- Overhanging tree outside Holm Oaks - reported to Highways and quickly removed.
- Planning application for land in front of Old Chapel granted.
- Two young ladies wanted to do litter-picking for DofE Award - equipment ordered and paid on credit card £47.95.
- Mike Fielding spoke to me about asking for a grant for PC for green equipment they want to buy - grant form sent.
- Email sent to Dover Security Services re invoicing - Clerk to follow up.
- Chocolates/biscuits for Valley volunteers agreed and David Hart will organise.
- I have reported Sherleys Farm re an extra caravan which has appeared - Planning Enforcement will investigate.
- 2 litter bins paid for - awaited for installation.
- Notification re receipt of ACV request sent to Hall with no name; confirmation of approval of ACV application on Glebe Field.
- Flooding in car park reported - DDC have cleared leaves and are arranging for drainage contractors to investigate.

- Upper Road road closure on 2nd October - Highways not aware and therefore could have been an illegal closure.
- Footpath walk comments sent to Kent PROW.
- Bright and Bright re White Cliffs Hotel - no interest in property (business not marketed).
- Re Sunnymeade - yes a demolition notice was raised by DDC.
- Quote from Rhino Plant at £810 re clearance of SFV - David Hart is investigating a further contractor. Clerk asked to investigate if National Trust may be able to help.
- Received one phone call re bus changes.

5. Planning

The following applications received since October had been dealt with under Clerk's delegated powers:-

22/01269	Erection of single storey rear and side extensions, rear dormer roof extension, alterations to existing external steps and extension to terrace over garage - Calais View, Bay Hill	<i>No objections</i>
22/01219	Erection of 2 front and 1 rear dormer, front porch and alterations to fenestration - 10 Roman Way	<i>No objections</i>
22/01009	Certificate of Lawfulness (existing) for the continued use of land as residential garden - Shalimar, Well Lane	<i>No objections</i>

The following comments were made on the applications considered:-

22/01289	Erection of 2no. detached dwellings with enlargement of existing access and associated hard and soft landscaping (existing dwelling to be demolished) - (brief presentation by rep from TG Designer Homes) 1 & 2 St Margarets Road	<i>No objections with the proviso that the enhancement land is preserved (4 in favour; 3 against)</i>
22/01375	Erection of a supported first floor rear extension, alterations to windows and installation of 4no. rooflights (part of existing roof to be removed) - Brown Cottage, 27 St Margarets Road	<i>No objections</i>
22/01370	Erection of two storey side, single storey rear and front porch extensions (existing conservatory, garage, side and rear extensions to be demolished) Starboard Light, 20 Lighthouse Road	<i>No objections</i>

<p>(b) White Cliffs Hotel - a new viability report has been added to the DDC Planning portal essentially asserting that the business is not worth marketing. It was agreed that PC would respond by stating that the applicant must go through due process in marketing the business per Policy DM24.</p>	<p>Clerk to deal</p>
<p>(c) The application to Dover District Council to list Glebe Field as an Asset of Community Value has been approved - a review period of this will now ensue.</p>	
<p>(d) Local Plan - the review of site allocations is under way and it was resolved that the Parish Council would respond (attachment to minutes).</p>	<p>Clerk to deal</p>
<p>(e) Housing Needs Survey - with current Local Plan proposals, it is important that PC identifies the need for affordable housing in the village. Cllr Fielding had been in touch with Tessa O’Sullivan at Action with Communities in Rural Kent who had provided an initial quote of £3,384 for a new survey to be undertaken. Clerk to add to next agenda.</p>	<p>Clerk to deal</p>

6. Bus service changes for village - discussed above.

7. Finance and Accounts

(a) The following payments made were approved:-

Mrs R Simcox - new footpath boards etc	£27.18
Kent County PFA - annual subs	£20.00
Wight Computers Ltd - website back-up	£198.00
PKF Littlejohn LLP - audit fee	£480.00
Mr I Miller - annual fee re Cemetery	£400.00
Greenlands Insurance Services Ltd re SFV tractor	£221.52
Castle Water	£49.36
St Margarets Village Hall - re Footpath walk	£10.80
St Margarets Village Hall - annual room hire	£252.45
JJM Electrical re Alexander Pavilion	£261.00
Lister Wilder - mower parts	£73.26
Idverde Ltd - grasscutting - July/August/September	£322.18
	£322.18
	£322.18
Dover District Council - new litter bins+emptying	£723.02
Castle Water	£19.54
Google Cloud	£46.00
Credit card - monthly ink	£4.49
NEST - Pension - Clerk+Council	£232.94
TR Commercials - mower service	£200.00
R Purchase - October invoice	£1180.00
OCD Cleaning Services - Alexander Pavilion	£300.00
RBL Poppy Appeal	£100.00
St Margarets Village Hall - re Channel Room meeting	£25.50
Jane Cook - October salary	£1366.03
Jane Cook	£25.50
HM Revenue & Customs - PAYE/NI	£317.75
Receipts - burial fees £285 + credit interest £8.75	£7500.88

(b) IT WAS RESOLVED to approve a grant request for the History Society of £700.

Clerk to deal

(c) Bowls Club - Clerk advised a grant application had been provided to Club who are seeking to purchase new green maintenance equipment - application awaited.

(d) Re phone box restoration - IT WAS RESOLVED to allow the extra funding of £115.20 requested by Emma Rosen in completing the project.

Clerk to deal

8. **Grasscutting**

Cllr Fielding advised of several complaints received from children's club and mens club concerning quality of grasscutting and lack of line-marking. Club now employing someone else re line-marking.

Cllr Fielding had contacted Idverde as line marking not done - despite contacts nothing done in October. Last weekend the referee wanted to cancel the match owing to the pitch surface.

Following contact by Clerk, 3 credit notes had been raised for last 3 months.

Cllr Fielding had contacted contractor B Young Grounds Maintenance who had undertaken a one-off cut and re-marked lines - invoice for £204 to be paid by Clerk. Further quotation to be received and placed on next agenda.

Clerk to deal

9. **Correspondence**

Per list provided to Councillors.

Mott re Local Plan housing proposals.

V Pay re Local Plan housing proposals.

J Thorn re Local Plan housing proposals.

Cornerstone re proposed telecom upgrade at East Valley Farm.

Steve Manion re Stagecoach network review - school bus update.

Kent Highways re Forward Work Programme Years 1 and 2.

KCC re National Highways and Transport Network - public satisfaction survey.

A Hoare re hedge at rear of property / Alexandra Field (Cllr Blake in liaison).

E Rosen - request for funding re phone box.

Dover District Council Local Plan Review Regulation 19 submission.

R Maraniello re Reach Road Farm licensing.

S Liggins re Christmas Tree and Crib Festival.

J Apps re yellow line proposals.

R Maraniello re yellow line proposals.

J Whittaker re Environmental Law Foundation (Glebe Field).

M Linford re yellow line proposals.

A Long re Reach Road Farm licensing.

J Leeming re flooding in car park - Clerk reported and DDC dealing.

S Morris re ticketing by Salisbury Road Residents Association.

Email re proposal for new war memorial - Cllr Gilham in liaison.

Pensions Regulator re re-enrolment and re-declaration.

Cllr Gilham to deal

Clerk to deal

10. **Reports from Councillors**

Cllr Newton - R Purchase had cut down two trees in the Valley. The gate erected on The Front is no longer required and it was suggested that this be moved to the Reach Road track, just beyond the garage. Cllr Blake will ask Mr Purchase if this is possible. One concrete post near Lighthouse needs re-concreting in the ground. Recent volunteer day in the Valley went well and Cllr Newton commended the volunteers on the amount of work they are able to do.

Cllr R Simcox reported on recent Footpath Walk which had been well attended. It had been reported that ER41 was blocked at various points and Clerk to investigate.

Cllr Harris had met with Tree Warden Martin Hunt - Martin advised he has planted 200 trees around the village, many in people's gardens. New wood near Roper land has been planted. Scouts have been helping with planting etc. Working team will undertake work along the broken down Church wall adjoining the car park to plant a living hedge - Cllr Harris will liaise with him in this respect.

Martin has done a lot of work in the churchyard and on 23rd December an ivy clearance session is planned.

Cllr Simcox advised that proposals re new double lines have been placed on PC website - expressed her thanks to Gridlock for providing details of proposals. Discussion ensued re 5 sites looked at and it was agreed that no decision could be made tonight but that further consideration would be needed. Suggestion of meeting with Highways rep to discuss proposals made.

Clerk to deal

Cllr Harris to deal

11. **Village Maintenance and Matters affecting the Parish**

Playing Field inspection undertaken by Cllr Blake - R Purchase continues to undertake remedial works at play area. Reported that tennis courts are very slippery and Mr Purchase will see if anything can be done to remedy this. Failing this, professional court contractor may be required. Cllr Blake currently places tide tables on the beach but these are sometimes removed and taken away. DDC have two poles/boxes in the Bay and Cllr Blake asked if an extra box could be provided in order for him to place the tide tables inside. Also one pole has rusted through at the bottom.

Christmas arrangements - Cllr G Simcox confirmed that switch-on ceremony is set for 3rd December. The plan is to gather at 5.45 at the village hall for carols with switch-on at 6pm. VJ at the village shop and First Light will be providing hot food. Raffle to take place at approx 7pm. IT WAS RESOLVED that PC meet cost of raffle tickets at approx £70.

Request from Cricket Club approved re erection of extra storage shed at King George V Field.

Cllr Newton reported further dumping of items alongside Jessamine Cottage outside the borders of their property. Community Warden had spoken to them in this regard. She asked that the route be added to the definitive map of public rights of way and Chair and Clerk will liaise in this regard.

Clerk to enquire

Clerk and Chair to liaise

There being no further business, the meeting closed at 9 p.m.

Confirmed:

Chair

14th November 2022

DOVER DISTRICT LOCAL PLAN REVIEW REGULATION 19 SUBMISSION

The Dover District Council Regulation 19 Submission version of its Local Plan is now open for consultation.

This consultation on the Regulation 19 Submission version of the Local Plan is opened on 21st October 2022 and any comments need to be received **no later than 5pm on the 9th December 2022**.

You can view and comment on the Regulation 19 Submission document by clicking on the link below

<https://dover-consult.objective.co.uk/kse/event/37116>

Please ensure you read the [Guidance Note on Legal compliance, soundness and the Duty to Cooperate](#) prior to making a comment.

DDC are also consulting on the following supporting / evidence base documents:

[The Sustainability Appraisal of the Reg 19 Local Plan](#)

[Habitats Regulation Assessment of the Reg 19 Local Plan](#)

[Infrastructure Delivery Plan \(IDP\) 2022](#)

Full details of how to make representations can be found in the [Statement of Representation Procedure](#).

If you have any questions or have any issues accessing the Regulation 19 Submission version of the Local Plan online, or have any questions, please telephone the Local Plan team on **01304 872244 – between the hours of 14:00-16:00 Monday, Wednesday and Friday** for assistance or email localplan@dover.gov.uk. If you require assistance with an accessible format of the Local Plan (such as large print or audio format), please contact the Planning Policy Team using the above number.

DDC AWARD FOR BUSINESS SUPPORT

Dover District Council (DDC) has been recognised for its work to support small businesses, taking the award for 'Best Programme of Business Support in the Southeast' at the inaugural Federation of Small Businesses (FSB) Local Government Awards.

It took part in a pilot project which saw it retain 100% of Business Rates and used the income to introduce a business grant scheme to support small businesses. The Council introduced two town centre grants for empty properties and shop front renovations to support ongoing efforts to support town centres, and a green energy grant for businesses located anywhere in the district.

The scheme offered businesses with less than 50 employees 50% of costs up to £10,000.

To date, DDC has awarded 66 grants, helping to bring 22 empty properties back into use, renovating 31 shop fronts, and helping 13 small businesses introduce more sustainable and carbon-free measures.

Dover

Urban Calm, Love Brunch, Dickens Corner, Lava Lounge, Elephant & Hind, Europa Fish & Chip Shop, Blakes of Dover, Rhino & Bull's, Sam Rois, Ivy Rose, Iristylers, Nick Rawbone, Dowle Vehicle Enhancement Specialists, Dover Dentures, OGI Properties, Warren Hairdressers, EIC Money Yours, Stanley's Bar & Coffee Lounge, Cactus Kiss/Sew Useful, Pizza Shack, Riverside Charity Shop, Pekish, Action Carpets, Dover International, Mr Apollos.

Deal

Joanne Harmer Gallery, Margherita's, Filberts Foods, Barkened, Hope & Lane, Your Shop, Two's Company, Algar Farm Shop, Hair Gallery, Ward & Corrigan, Merchant of Relish, Taylor-Jones & Son, Arno & co, Mileage, The Bar, Pop Up Café, Frog & Scott, Will & Yates, Cin Cin, Quirky Giftz, Solley's Farm, Jenkins & Sons Fishmongers, Retro Cookshop.

Sandwich

The Old Pharmacy, Collections, Waiting Room, Sandwich Bay Bird Observatory Trust, The Grain Store, My Happy Place Café.

Aylesham & Snowdown Welfare Bowls Club.

RURAL ENGLAND PROSPERITY FUND

DDC has received a grant of £400k. This is meant for the rural communities and is aimed at Business Development, Farm Business Diversification & Community Infrastructure.

DCC Tourism & Infrastructure team will be contacting Parish Councils imminently

FREE STREET DANCE SESSIONS IN DOVER AND DEAL

Girls aged eight and over in the district have been enjoying free street dance sessions organised by DDC. The project is funded by the charity, StreetGames, which aims to change lives and transform communities through the power of sport. These fun lessons have proved to be really successful in Dover and are now also taking place in Deal. With teaching that includes learning various street dance moves and exercises that will strengthen joints and improve their flexibility, the participants are learning a street dance routine as part of a group too.

Dover sessions (until 29 November)

Tuesday evenings, 4pm-5pm, at Green Park Primary School

Wednesday evenings, 6pm-7pm, at St Radigunds Community Centre

Deal sessions (until 4 January)

Wednesday evenings, 4.30pm-5.30pm, at Golf Road Centre, Deal

Thursday evenings, 4pm-5pm, at St Richards Church Centre, Deal

LOCAL ISSUES

1). The Bay Car Park

We are still awaiting dates from the resident so that a meeting can take place with him concerning the PSPO and camping enforcement issues. However, at the last meeting you requested data on the number of visits made by the dog warden to the Bay car park in August along with the number of FPNs issued. You also asked for similar information for King George V and Alexandra Fields and requested statistics on the number of parking enforcement visits made during the summer period plus the number of PCNs served. The information I received was as follows and was relayed to the parish clerk:

“In respect to King George the V and Alexandra playing field our records show that no patrols have been conducted and no FPNs have been issued during June to September. Our records show that the last time we received any complaints regarding dogs in these areas was October 2020. For clarity there are no dog restrictions at Alexandra playing field and there is only a dog exclusion order in place at King George the V’s playing field within the enclosed children’s play area and tennis courts. A copy of the current PSPO can be viewed on our website or by clicking on the following weblink [Public Spaces Protection Order \(dover.gov.uk\)](#)”

There have been 4 patrols conducted at St Margaret’s Bay and one Fixed Penalty Notice issued for a dog not being on a lead. There were 41 visits to the car park by parking enforcement during the summer period and 6 PCNs issued

Please note that there is no requirement for us to place signs at every entry point to the beach, promenade, or car park to notify the public that there are dog restrictions in place or inform them that patrols are operating in the area, however every effort is made by our team to ensure there is sufficient signage to inform the public. New signs have recently been erected in these areas following the renewal of the PSPO in July. There are two 300mm by 600mm signs (big ones) and ten A4 sized signs in this area advising the public of the dogs on lead and dog exclusion requirements in this area. Our Dog

Warden had assessed the level of signage prior to the renewal of the PSPO and believed that the number of signs currently in place be appropriate to enforce the PSPO. With the installation of signage there are always limitations such as furniture to attach signage too, budgets and risk of over signing. Many coastal towns and villages across the UK have seasonal beach bans such as St Margaret's Bay and dog owners have the responsibility to ensure they are following the local requirements.

We encourage members of the public to report issues relating to dog control to us so that we can ensure our Dog Warden is spending his time in the areas where problems are occurring. Reports can be made in the following ways:

- By visiting our website or by clicking on the following link [Report \(dover.gov.uk\)](https://www.dover.gov.uk/report)
- By emailing envcrime@dover.gov.uk
- By telephoning 01304 872096

Once a report is received a worksheet is raised to our Dog Warden in our back-office system and patrols then scheduled. Should there be ongoing issues occurring at King George V playing field and Alexander Field, I would encourage for reports to be made via the channels above.

As you know we are currently advertising for three Environmental Enforcement Officer roles which once in post will be responsible for conducting proactive patrols across the district to tackle dog related issues and littering. These roles will provide a vital role in assisting our Dog Wardens work."

3. Conservation Appraisal for St Margaret's Bay

The appraisal went to Cabinet on 7/11. There should now follow a period of consultation lasting six weeks and the DDC Conservation Officer, Alison Cummings, will be attending a meeting of the SMBCA on 14th December.

4. Verges in Upper Rd

Initial requests for these to be cut back by KCC were made by both Jane and I in July but have yet to be undertaken. A chaser to Keith Watson was sent on 14th October and the following response was received:

"The Upper Road CSM was only logged on the 4th October but I can see that the PC logged a similar enquiry in the summer and as a result the highway steward did raise an order for some vegetation to be cut back although, having had a look at the photos on the system, I'm not entirely sure that the contractors have done as he asked as they don't seem to have cut back enough and certainly not up high enough. This enquiry from the PC only seems to have addressed the Deal Road of Upper Road though. The enquiry that was logged on the 4th October by others, relates to the whole stretch from the Langdon Cliffs to Deal Road so I suspect that there are further works required here and as such we will reinspect and arrange as necessary, be it us cutting it back if our vegetation or us contacting adjacent landowners to fulfil their duties if their boundary vegetation. The second enquiry relating to Deal Road is being dealt with, but this is private vegetation and as such we must follow due process and engage with the landowner for him to resolve this one. It has been inspected and it is not felt that it poses enough of a hazard now that we would step in, carry out urgent remedial works and must foot the bill ourselves."

5. Vehicle blocking the footpath outside Jessamine Cottage, Reach Rd

Following on from our conversation on Monday I have made some enquiries with Parking Services who have provided me with the following response:

"If, as I think you did say, the obstruction is taking place on private property then it might be best for you to approach the village PCSO. If they are parking on the double yellow lines on the approach to the car park then Parking services can certainly take some action."

I discussed this with Cllr Richardson and it turns out that the number of PCSOs currently working in the Dover and Deal area has now been reduced to five. However, the Inspector who has taken over responsibility for the team is keen to increase the number and will make home visits herself. Ollie is currently investigating to see whether she would be willing to give this case more priority. Our nominated PCSO, River Jarvis, has now left the Service.

6. Request to investigate an unannounced closure in Reach Rd on 2nd October

KCC have no record of any closure authorised for the day. It must have been an illegal closure. Would suggest phoning the police and reporting it if it happens again.

7. Request for the vegetation to be cut back along the church wall that borders the High St.

On 31st October Property Services advised Ollie that this work would be completed by the end of the week.

8. Glebe Field

Concerns were raised that that the ACV application forwarded in September had yet to be responded to. Following enquiries with DDC we were able to confirm that they had acknowledged your application on 22nd September. Details were forwarded to the Parish Clerk.

9. Licence to extend hours at Reach Court Farm

Licensing Services confirmed that the following variations to the current licence have been applied for:

1. Noise readings to be taken to ensure noise levels at 1m from the façade of the nearest dwelling are not above 70dB
2. Amplified music will not be permitted outside the premises
3. Events will extend over no more than 28 days per calendar year

There have been a number of objections, so it is likely to go to a full hearing in front of a Licensing Sub-committee.

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

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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.

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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

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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;

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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.