

**THE PARISH COUNCIL OF ST MARGARETS-AT-CLIFFE**

Minutes of the Ordinary Monthly Meeting of the above Parish Council held on Monday 13th February 2023 at 7pm at St Margaret's Hall.

Present : Cllrs Rebecca Simcox (in the chair), P Blake, J Harris, G Simcox, C Taylor, A Newton, T Gilham, together with Clerk. Cllr A Fielding attended via video.

KCC Cllr Steve Manion in attendance together with District Cllrs Martin Bates.

(25-30 members of the public in attendance for Stagecoach agenda item).

**Public Participation:-**

Resident questioned whether a 20mph speed limit could be introduced for whole village - Chair responded re current Highway Improvement Plan being discussed with Kent Highways where a short stretch of the High Street/Sea Street may be possible to be so introduced.

1. The minutes of the Parish Council meeting of 9th January 2023, having been circulated to all Councillors, were confirmed as a correct record of the meeting.	
2. Cllr Newton declared an interest in the grant application for the Dementia Cafe; Cllr Fielding declared an interest in the application received from the Bowls Club due to a family connection.	
3. <b><u>County and District Councillor Report</u></b>  - Report received from District Cllr Martin Bates (attached to minutes).  - Cllr R Simcox requested a brief chat with Martin and Cllr Richardson re planning for Glebe Field.  - Vote of thanks expressed to Martin for his work in deterring the idea of the introduction of Sunday parking charges through the District.  - County Cllr Steve Manion - advised re new household support fund where qualifying households can apply for sum of £100 re energy costs etc - can be found on KCC website.  - Cllr Newton pressed on Cllr Manion the need for either a roundabout or traffic light solution for the Station Road/A258 junction - a bad accident involving her grandson occurred last weekend. Cllr Manion will feed this up to Highways Manager.	
4. <b><u>Stagecoach re Reduction to Bus Services</u></b>  ● Matthew Arnold (Commercial Manager) and Louise Sills (Operations Manager) attended for Stagecoach.  ● Following points raised by members of the public present:-	

- Maria Fitzgerald - service for St Margaret's has been decimated - with a lot of people (elderly/non-drivers/disabled/workers) being impacted by the cuts in service; the No 93 service is so limited with the last bus back from Deal to the village at 2pm from Deal.
- Residents are starting to feel like "prisoners" in the village, particularly felt at weekends/bank holidays when there is no service at all. A number of people were alone over Christmas and New Year.
- People use the bus for shopping, doctor and hospital appointments as well as socialising; Maria herself advised that she had to pay £40 for a taxi for a hospital appointment due to no available buses. Also commented that Tourism will be badly hit by the cuts.
- Volunteer from South Foreland Lighthouse - when working at the Lighthouse, she directs visitors to the village for buses. "Kent feels like the poor relation". She is currently undertaking a walking challenge around the UK and there is a coastal service everywhere except Kent. She is aware of an elderly lady spending £45 on a taxi for hospital - this then meant that she had no money left leading to isolation.
- Sarah ? - advised that she recently sold her car in an effort to "go green". She lives in the town but her Mother lives in the village and she had not appreciated how huge the change to the bus service would be - such that she has now had to buy another car. Using the bus app advises travellers to get off the bus at Ringwould on the A258 - this is a death trap. She believes that the "dog leg" solution of coming in via Westcliffe/Dover Road to the junction and re-existing on to the A258 is a workable solution together with No 93 bus. This would only entail two stops, then on to Deal road.
- Reports advised of an elderly lady getting off the bus at the Swingate, and walking to the village at night cross-country - an ordeal for her.
- Resident - "frequency is the main issue, with last bus from Deal at 2pm".
- **Louise Sills and Matthew Arnold advised as follows:-**
  - Back to pre Covid times 95% of service was run at their commercial risk, with 5% deemed to be socially necessary funded by KCC through a tendering process - No 93 is a KCC service.
  - Pre pandemic Nos 80 and 81 were losing £320k a year. Through the Pandemic the company was provided with Central Government support - this came to an end in October 2022. Passenger numbers have reduced to around 80% of previous and off-peak service has suffered.

- DOT - sat down with KCC and discussed “this is what we can run, or not run”.
- Passenger numbers have remained static at 80% of previous numbers. KCC are cutting budgets and UK wide there will be a lot of bus service reductions.
- “We don’t expect this to be the end position” but the business needs to survive. With losses being seen the company needs to save money very quickly. On questioning, Matthew advised that an average of 25 people per day were using the service from the village, excluding schoolchildren.
- Sarah - when was the service last profitable? Matthew advised it was covering its costs in 2016.
- As regards the dog-leg idea, the knock-on effect to the service would need to be investigated, together with new bus stops/shelters.
- Cllr Manion of the new bus service from Aylesham which is “ride responsive”. However this was only possible through large developer contributions from housing at Aylesham.
- Matthew advised there is no certainty on future funding or service and cannot make any promises.
- Cllr George Simcox - “could PC fund a bus to come through the village”. Although this would be possible, financially likely to be unviable.

5. **Richard Haynes, White Cliffs Countryside Project**

- Advised that South Foreland Valley has been in Environmental Stewardship since 2011 - this provides a small maintenance fund (originally capital funding was available).
- Since Brexit, have been awaiting transitional arrangements but nothing has yet materialised in the way of new schemes.
- Now have the opportunity to extend the current Environmental Stewardship Scheme through Natural England for a further 5 years - IT WAS RESOLVED that Parish Council take this forward and Clerk to make arrangements with Richard to sign relevant paperwork.
- On question from Cllr Newton, Richard will arrange for quotations re removing white poplar trees. Cllr Newton also advised of building spoil outside property on The Front and this to be investigated.

Clerk to deal

6. **Clerk Report**

- Simon Creed had agreed to take on checking two extra defibrillators.
- Invoice re fencing in South Foreland Valley received and paid.
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- Have written to Braeside re alleged blocking of footpath, no reply as yet.
- Cricket Club have a match on 6 May - the day of the Coronation. Hall did not have any bookings re Coronation.
- Resident contacted me re refreshing of yellow lines in The Drove way - confirmed this has now been done.
- PC meetings re-arranged to 17 April and 15 May.
- Resident reported fall over bollards in centre of Reach Close.
- Further email received from Ms H Watson.
- Have written to DA Tree Surgeons re yew tree at PO Corner, no reply as yet.
- Cllr Fielding will make contact with Cllr Derek Murphy re housing needs survey for village.
- Voter ID required for elections.
- Resident reported flooding at junction of Nelson Park Road - District Cllr Bates had reported to Kent Highways.
- Upper Road closure 27 Mar-7 April and closed overnight A258 Dover Road and Reach Road 11 Apr-20 Apr (on website).
- 20 copies of Burial Ground rules given to Cemetery Registrar.
- Martin Hunt had advised he wishes to step back from being Tree Warden and Clerk asked to write to him expressing thanks for his work.
- 16th Feb DDC Parish/Town Council meeting at Whitfield - Clerk advised she cannot attend but Cllr Blake will attend for the PC.
- No reply received from Natalie Elphicke re bus service changes - Clerk will follow up.
- Cemetery Registrar had asked if PC should go green re floral tributes at the Cemetery, i.e. no use of plastics. This was agreed and Clerk will speak to Registrar.

Clerk to write

Clerk to follow up

Clerk to deal

Cllr Blake to attend

Clerk to deal

Clerk to deal

## 7. Planning

The following comments were made on the applications considered:-

- 23/00012 Overall crown reduction of up to 1.6 metres and shape to one Taxus (yew) the subject of Tree Preservation Order No 4 of 1994  
Cliffe Cottage, Cripps Lane *To be decided by Trees Officer*
- 2/01289 Erection of 2no. detached dwellings with enlargement of existing access and associated hard and soft landscaping (existing dwelling to be demolished)  
1 & 2 St Margarets Road *No comment*
- 21/00936 Erection of 8No. terraced dwellings, new vehicular access, parking and landscaping (amended scheme)  
Land To The South East Of 1-9 St Georges Place, Reach Road  
*Object - attached to minutes*

22/01720	Erection of a dwelling with parking and stores (existing building to be demolished) The Ledge, Bay Hill	<i>Object - inappropriate development on a very cramped site; causes overlooking; located close to to dangerous hairpin bend; low standard of accommodation</i>
23/00058	Erection of 2 storey side and single storey rear extensions (inc. enlarged dormers and gable roof) (garage demolished) 1 Vicarage Lane	<i>No objections</i>
23/00103	Erection of a single story side extension (Retrospective) Jean, St Vincent Road	<i>No objections</i>
23/00075	Erection of porch, garage conversion, front window, relocation of front door, timber cladding to elevations and chimney flue (conservatory demolished) Nordic, Chapel Lane	<i>No objections</i>

8. **Meeting with Kent Highways**

- Cllrs R Simcox and A Fielding had met with Kent Highway reps to discuss the amended Highway Improvement Plan (exhibited and on website). This had been provided to all Councillors prior to meeting for consideration and comment.
- Looking at proposals for introduction of double yellow lines, the one suggested for the end of Kingsdown Road had been taken off - several residents in the vicinity had requested similar things outside their own property and the Bowls Club had raised an objection re visiting and local player parking. Regarding the request for the first section of Kingsdown Road, suggestion re a disabled parking bay had been considered - this would lie with DDC rather than KCC.
- Looked through HIP details - as regards a 20mph limit, this could be considered from Dover Road through High Street to Reach Road junction - cost to the Parish Council likely to be around £12,500 and an initial design fee of £1,006. IT WAS RESOLVED that PC would meet this initial cost, but check re including Reach Road.
- Bay Hill - Highways had intimated that they would be prepared to put a "bus box" at the Bay Hill turning point, at their cost. Cllr R Simcox had requested illustration of how this would look.
- Likely cost of double yellow lines £4,000 - looking at suggested lines for Reach Road, it was mentioned that initial request by Gridlock Group had shown a single yellow line continuing beyond the double one suggested, in order that the village hall is not disadvantaged re parking for events. Cllr Fielding agreed this idea could be re-visited. Highways have stated that PC would need to undertake leaflet dropping.

- Re suggestion of gates x 2 for village entrances, this would entail a design fee of £1,006 and possibly £1,500 per gate. IT WAS RESOLVED that this is not taken forward.

**9. Finance**

The following payments made since January meeting were approved:-

Mrs E Rosen - re telephone kiosk	£150.24
Google Cloud - Jan 23	£46.00
R Purchase - South Foreland Valley fencing	£2,875.00
CPRE - annual subs	£36.00
Castle Water	£49.36
Credit card (re ink)	£9.49
Richard Buxton Solicitors	£864.00
Castle Water	£19.54
Imperative Training Ltd - defibrillator (replacement)	£594.00
Google Cloud - Feb 23	£46.00
Mrs R Simcox - re return fees for defibrillator	£38.07
NEST Pension - Council and Clerk	£232.94
R Purchase - Jan invoice	£1,662.40
Jane Cook - Jan salary	£1,373.73
Jane Cook	£25.66
HMRC - Tax/NIC	£298.72

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£8,321.15

Receipts:-

VAT refund	£8,935.58
Credit interest	£29.82
O Ashton re bench (in advance)	£767.00
P Brown re bench (in advance)	£870.00

IT WAS RESOLVED that contracted rate for R Purchase be increased by 10% with effect from 1 April 2023.

IT WAS RESOLVED that contracted rate for I Miller be increased by 10%, with an increase of 10% to Cemetery Retention Fee to £440, both with effect from 1 April 2023.

IT WAS RESOLVED to increase Clerk's salary with effect from 1 April 2023 by 10%.

IT WAS RESOLVED to increase payment to Lynne Hopwood re toilet cleaning by 10% with effect from 1 April 2023.

**10. Grants to Local Organisations**

The following S.137 LGA 1972 grants were approved:-

St Margarets Mother Baby and Toddler Group	£550
The Dementia Cafe	£750
St Margarets Nursery	£1,794
Spirit of St Margarets	£350
Pegasus Playscheme	£1,000
St Margarets PCC - Churchyard volunteers	£100

A grant application for £13,000 had been received from St Margarets Bowls Club following their attendance at last month's PC meeting, allowing £11,000 for remedial building works and £2,000 towards a new aerator/spiking machine for the green.

An initial inspection of the floor had shown quite a lot of work required; an initial inspection and remedial work by Chris Clayson had been undertaken - IT WAS RESOLVED that the cost of £2,000 be met by the Parish Council with Clerk to be provided with invoice.

A further examination is needed of the floor before any decisions are made; work will also be required to the roof structure. As the building is in the Conservation Area, any exterior works would need to be approved and consultation with DDC is required. Cllr Gilham believes a full structural and engineer's report is required but initial investigations to be undertaken first.

In view of the above, PC to advise Club that they will look to undertake any building works required and that whilst they are sympathetic to their need for the new equipment, the priority in the first instance must be the building as the whole situation needs to be looked at in full.

Clerk to pay invoice - to be ratified at next meeting

Cllr Blake will liaise with Club

#### 11. Correspondence

- Further emails from Ms H Watson.
- Vyvian Smith re Enid Mellows memorial meeting.
- KALC re events for prospective Councillors - 21st Feb and 21st Mar.
- DDC Strategic Housing re Housing Needs Survey.
- Cllr Martin Bates re election ID requirements.
- DDC calendar of meetings 2023/24.
- Streetworks South East re temporary closure of Upper Road 27 Mar-7 Apr.
- Cllr Martin Bates re - letter from the Secretary of State for DLUHC regarding His Majesty King Charles III's Coronation.
- Zurich Insurance re any Coronation events.
- Hayley Buery KCC re English National Concessionary Travel Scheme (ENCTS) Bulk Renewals March 2023.
- Streetworks South East re A258 Deal Road, St. Margaret's At Cliffe Closure 11 Apr - 20 Apr.
- Rebecca Brough re Town and Parish meeting 16 Feb.
- KALC re Home to School and Post 16 Transport for Mainstream and SEND Pupils - Public Consultation.
- KALC re elections timetable.
- Simon Richardson re Reach Road traffic.
- Christine Waterman re metal detectorists in Valley.
- Cllr Martin Bates re demolition notice for The Edge.
- Email from resident re cattle in the Valley.

#### 12. Reports from Parish Councillors

- Report received and noted re South Foreland Valley.

- Cllr R Simcox advised that Shepherd Neame would not accept the defibrillator provided for outside the Coastguard pub; this has now been returned and one more acceptable to them ordered - now received and installed. Clerk confirmed that refund for original machine had been received.
- Cllr Gilham had tried to contact Mr Poole re war memorial; Cllr Newton advised that the decision had now been made to site the memorial in the Churchyard.

13. **Village Maintenance / Matters affecting the Parish**

- Cllr Gilham noted that the sign at the entrance to the village near Holiday Camp is obscured. He will provide photos to Clerk who will report.
- Playing field inspection undertaken by Cllr Blake - noted. Cllr Blake reported that Mr Purchase often finds dumped items around the village which it is difficult for him to dispose of without incurring a cost at the tip - Clerk will investigate if an exemption ticket can be sourced via KCC.
- Cllr Blake had provided details from Trevor May Contractors of works required to the tennis courts. Cleaning of both courts would cost £1,375 + VAT - IT WAS RESOLVED to accept this cost. Once this has been done, further works may be required - Club would be prepared to pay 10% of the cost of cleaning. This item to be ratified next month. The Club is prepared to pay for new netting at cost of £125.
- Given the work and organisation undertaken re the Queen's Jubilee event last year, the Parish Council will not be organising a specific event for the King's Coronation.

Cllr Gilham and  
Clerk to deal

Clerk to check

Clerk to deal

There being no further business, the meeting closed at 9.25 p.m.

Confirmed:

Chair

13th February 2023



## **MEETING REPORT FOR ST MARGARET'S AT CLIFFE PARISH COUNCIL ON THURSDAY 13.02.23**

New user-friendly housing register system to be rolled out. A new housing system and website is being rolled out across Kent to create a more user-friendly service for people on the housing register. Once launched, applicants will continue to log into their accounts and be able to view and bid on properties in the Dover district as and when they become available, the same as they do now.

To move from the current system to the new one, however, it is essential that any new applications to the housing register are suspended for a month while outstanding ones are completed and data moved over. This will happen from June 1, 2023, and Dover District Council is suggesting applicants wanting to apply to the register put in new applications well before this date. The register will resume on July 1, 2023.

The process for people who find themselves unexpectedly homeless or requiring housing options advice during that month will still be in place. For anyone that needs to apply urgently during June, DDC will provide a telephone service to enable this and the number will be published on the council's website. For more information about the housing register or to submit an application go

to [www.dover.gov.uk/housing/home.aspx](http://www.dover.gov.uk/housing/home.aspx)

### **LEVELLING UP FUNDING**

Two projects in Dover have been awarded over £63 million to deliver new investment to boost jobs, skills, and access in the town in the latest round of the Government's Levelling Up Fund. Dover District Council has secured £18.1 million for the Dover Beacon project to transform a brownfield site on Bench Street in the heart of Dover town centre. The redevelopment of the site will include:

- An education campus providing training opportunities in creative and digital industries, expanding access and the curriculum for local students.
- A business centre, providing flexible, affordable facilities for start-ups and small, and medium sized enterprises (SMEs) to attract and retain skilled workers and provide new employment opportunities.
- A riverside parklet, creating accessible green space for local people and visitors.

Separately, Kent County Council has been awarded £45m for the Dover Access Improvements project. This will improve the flow of traffic from the UK to the EU, with more border control points and a new exit route to help the Port of Dover operate more efficiently and reduce congestion on local roads in Dover.

### **VOTER ID**

District and Parish elections are due to take place on Thursday 4 May 2023. The deadline to register to vote in these elections is Monday 17 April 2023. If you are not already registered, you can register to vote on-line at <https://www.gov.uk/register-to-vote>

The UK Government has passed a law that requires individuals who wish to vote in person, including those acting as a proxy on behalf of another individual, to produce an accepted form of photographic ID to prove their identity before they will be issued with a ballot paper at the polling station.

Accepted forms of photographic ID include items such as:

- A passport issued by the UK, any of the Channel Islands, the Isle of Man, a British Overseas Territory, an EEA state, or a Commonwealth country
- A driving licence issued by the UK, any of the Channel Islands, the Isle of Man, or an EEA state.

There is a long list which can be obtained from the DDC website. Expired photographic identification documents can still be used as accepted photographic ID at the polling station, as long as the photograph is still a good likeness of the elector and

the name matches the details held on the Register of Electors. Where an elector does not have or does not wish to use one of the accepted forms of photographic ID, they can apply for a Voter Authority Certificate (VAC). This is a document containing an elector's name and photograph which can be obtained free of charge from the Electoral Registration Officer (ERO) at Dover District Council, following verification of the applicant's identity.

You can apply by either:

- Online at <https://voter-authority-certificate.service.gov.uk>
- By providing the necessary information in writing (eg on a paper application form)
- In person with the Electoral Services Team at the Council offices in Whitfield.

You will be receiving further information as we get closer to the election. The new DDC Community bus will also be touring the area and providing additional information and handouts.

## **LOCAL ISSUES**

### **1. The Bay Car Park**

A meeting took place with Mark Sawyer and officers in Whitfield, on 24th January, wherein they told him that they would only take enforcement action if there was found to be serious anti-social behaviour taking place within the Bay. He was provided with information as to how to report such information to the council so that the details can be properly recorded and acted upon.

2. Request for a replacement notice pole for the entrance to the Reach Rd Car Park . This has now been replaced along with a lockable notice board.

### **3. Bus services.**

I attended the launch of a new Hopper Bus Service in Aylesham on 7th February and reminded Louise Sills of your invitation to attend a parish meeting. She said that she would be contacting you shortly.

### **4. Flooding on the Junction of Nelson Park Road and Seymour Rd**

A resident emailed me with a complaint about flooding in this vicinity and I forwarded her concerns to Cllr Manion who has taken it up with KCC Highways.

## Application 21/00936 Amended

The Parish Council has considered the amended design for housing development on the Glebe Field site. Although the amended application is for 8 dwellings rather than the original 14, the new construction proposals for 2 substantial three storey, parallel terraces appear to have an even more dominant effect on the open space and would urbanise a much valued natural space at the centre of this rural settlement. Therefore the objections already submitted by the Parish Council are re-affirmed and the 480 plus objections from local residents remain valid.

Since the original application was submitted the Regulation 19 Local Plan has been published and its policies are now being referenced by planning officers. Policy PM5, Protection of Open Space, Sports Facilities and Local Green Space, states that In all circumstances, the loss of open space will not be permitted if that open space:

- 1 Contributes to the distinctive form, character and setting of a settlement;
- 2 Creates focal points within the built-up area; or
- 3 Provides the setting for important buildings or scheduled monuments, or are themselves of historic or cultural value.

The Parish Council maintains that the application breaches the three conditions of this policy. The ACV submissions covered all of these points about the distinctive character of the site, its focal point situation next to the Village Hall and its cultural value to the community for over a century, and this was accepted by DDC. The ACV applies up to October 2027. In addition to the value of the field as a recreational amenity, enjoyed by the community and used regularly by the Scouts until 2016, the village also values this open natural space at the heart of the village which is part of the green infrastructure network and assists the transition from the settlement to the surrounding AONB.

The proposed development is still of a scale too large to be considered windfall development and, as the site is listed as protected open space in The Regulation 19 Local Plan, development on it would represent a departure from the Plan. It is not compliant with policy DM1 of the existing Core Strategy. There are also compliance issues with policies CP7 and DM25. The Regulation 19 Local Plan includes 4 housing development sites for up to 96 dwellings in St Margaret's. This Plan already makes adequate provision of housing land to serve the needs of the village. There are no material considerations or public benefit outweighing the significant loss and demonstrable harm to the community that this application would inflict.

The Design and Access Statement submitted to support this application provides much detail about the site history, the proposals for development and the design of the dwellings. However, in addition to the technical information about the type of buildings now put forward in place of the original 2016 application, it includes a number of misrepresentations, errors and omissions that together undermine the validity of the document.

1. The statement on page 3, amplified on page 12, that the village has sufficient open space without the Glebe Field, is simply wrong. This has been demonstrated by the Parish Council in previously submitted objections and is explained again below. In this particular instance the Glebe Field serves to provide a green space in the village that contributes greatly to visual amenity, wellbeing and biodiversity.
2. On page 4 the reference to the ACV applications is out of date. A new ACV was granted in 2022. This strengthens the protection of the amenity.
3. Page 5 refers to a consultation process going back to 2014 but omits many relevant details. The Parish Council indicated in 2015 it could not support any proposal to build housing on the Glebe Field. The objections from the community are almost unanimous in opposing the application, currently 445 to 3, and most of these object to the imposing design of the buildings and the loss of this much valued green space amenity which had provided public benefit well documented for over 100 years.

4. Page 8 section 4.3 claims The current layout of buildings does not make best use of the site. This is misleading. The existing St Georges Terrace is not on the Glebe Field. It is situated North West of the open space and separated from it by two lines of trees and a pathway, later referred to as “the forest walk”. Therefore the claim that the proposal would somehow rectify the site is disingenuous.

5. On page 11 it is claimed that the proposal is for “windfall development”. As the number of dwellings exceeds 6 it is arguable that this scheme does not qualify as windfall. As it is on a designated open space, which the ACV testifies is much valued by the community, the proposal is in breach of Regulation 19 strategic policy SP4 , section d) which states a proposal should “ conserve and enhance landscape character and biodiversity and not result in an unacceptable intrusion into the open countryside or the loss of important green spaces within the confines that contribute positively to the existing character of that settlement;” In the implementation paragraphs 3.73 of the Local Plan this condition is further emphasised: “ In order to ensure that windfall developments are successfully integrated, all development proposals will have to demonstrate that they complement the layout, scale, fabric and appearance of the existing settlement and that they will not result in the loss of important green spaces within the built confines that contribute to the existing character of that settlement, to be considered acceptable”. The Parish Council maintains that this application fails to meet these requirements and therefore is unacceptable.

6. Page 12 contains the claim that the Glebe Field site is “surplus to requirements” This is seriously incorrect. This space, adjacent to the Village Hall, is the ideal open space for community use and events. This is why it was purchased by Sir Fred Cleary, founder of the St Margaret’s Bay Trust, to enable community use “in perpetuity” (quoted from Cleary autobiography).

The village has the King George V field but this is the cricket club ground with tennis courts so primarily a sports facility. (It does also have an enclosed children’s playground). There is also the Alexander field on the Northern edge of the village with limited access but this is a football ground used throughout the year for sports and so unsuited for community events. For the Queen Elizabeth 2nd Jubilee the Parish Council requested use of the Glebe field for a community celebration but this was refused. It did eventually hold an event on the King George V field but only at considerable expense of bringing in public facilities and an immense amount of work making it safe while protecting the sports facility. Therefore the Parish Council will not attempt this again for the Coronation this year. The Glebe field, with its proximity to the public facilities of the Village Hall, remains the ideal location for community events which is why the Parish Council made the request in 2021 to the Bay Trust to acquire the field. There is no other space within the village suitable for large community events. Furthermore the Glebe Field provides a passive open space that contributes greatly to visual amenity and wellbeing.

7. Pages 8 and 9 include reference to the planning history of the site and this is further described in Appendix 1. However this account is incomplete. Long before 2015, when this proposal to build dwellings on the site was raised, there had been a proposal to build another terrace, similar to and opposite St Georges Terrace. As this would have left most of the Glebe Field intact and available for community use, it is possible the Parish Council at that time would not have objected to an application. But the Parish Council was informed that the planning department would not accept such a design on the grounds it would create an urban type development unsuited to this rural location. In 2007 the Parish Council made contact with the planning department about a request it had received from the Bowls Club to relocate to a larger site but was advised that such a proposal would be unlikely be granted for the Glebe Field site. In 2011 the Parish Council was again in contact with planning department about another local proposal to locate a small youth club facility on the field. This was when the Scouts were already using the field for their activities. Once again the indication received from the planning department was that any permanent building on the site would not be granted permission. When in 2015 the Bay Trust approached the Parish Council with the proposal for a large development on the site it was made clear it could not agree to it.

Unlike the earlier proposal this development would remove the field from public use. This was not a change of mind by the Parish Council as has been alleged. The Parish Council has consistently supported maintenance of the field for public benefit. Subsequently two senior officers from the planning department met with the Parish Council to discuss the application and they indicated to members that

that the planning department was unlikely to grant the application without the support of the Parish Council. Soon after that the Bay Trust withdrew the application. Therefore it is clear that the planning department has over a period of years been consistent in declining to grant any permission for development on this open space. The Parish Council trusts it maintains this consistency and refuses the current application.

8. Pages 13 onwards claim that the design in the application conforms to NPPF paragraph 127, including sections b) and c) which require development to be “visually attractive as a result of good architecture” and “sympathetic to local character and history”. (This appears to reference an older version of the NPPF. The relevant paragraph is now 130). Inspection of the proposed elevations in the application reveals that instead of individual houses the dwellings will be contained in two substantial terraces. The terraces, by virtue of their width, height (3 storey) and bulk will inevitably be visually imposing and result in a layout of 2 parallel terraces. In no sense can this be described as “visually attractive”. It would result in an urbanisation of the site totally out of character in this sensitive rural location. It is claimed that retention of surrounding trees would provide mitigation but this would not apply in the winter months when there is no foliage. Photos taken from all four sides of the field demonstrate how open it is at street level. This is shown in the photos at the end of this document. (The PDA claims there are no preservation orders on the trees but this is out of date. All trees on the site are now covered by orders).

In no way can the development be described as sympathetic to local character and history. Apart from the listed Coastguard Cottages there are only two small terraces of housing in the settlements of St Margaret's, on Reach Road and in the High Street and both dating to 1900. The village is predominantly characterised by a variety of single or semi-detached dwellings. The history of the site shows that it has been in community use for over a century. This proposed development is not compliant with NPPF 130 a) b) and c).

9. Pages 14 and 15 make reference to Dover Local Plan policies but, as the Regulation 19 Local Plan has now been issued, many of the references are becoming obsolete. The requirements, data and policies quoted are now being replaced and so are of limited weight. The claims about the invalidity of the open space designation of the Glebe Field are in error. The field is listed in the DDC Open Space Assessment 2019 as site 384 “St Georges Place” (with an above threshold quality and value rating) and is now in the Regulation 19 Plan as a designated open space and therefore acquires stronger protection. When the new Local Plan was being created 11 sites in and around St Margaret's were considered but only 4 have been included in the Regulation 19 Plan. The Glebe Field was deleted from potential sites at the Stage One Assessment and so there is no DDC Landscape Sensitivity Assessment for the site. The applicant's site assessment, by Knight, Kavanagh and Page, included in the application concludes it is low sensitivity but this fails to take into account its formal designation, the published views of the Parish Council and the Village Hall Association, the ACV, the TPOs and the objections of over 400 residents.

The absence of the site for development in the Dover's Local Plan ties in with its consistent reluctance to approve development on it since 2007.

10. Page 18 makes reference to affordable housing provision and states the development will not include an affordable housing element but instead a financial contribution will be offered. This would be in line with DM5 of the Core Strategy. But Regulation 19 Local Plan strategic policy SP5 states “The Council requires the provision of affordable housing on schemes of 10 dwellings or more (and on sites of 0.5 hectares or more), and in Designated Rural Areas on schemes of 6 dwellings or more, with provision being not less than 30% of the total housing provided on the site”. St Margaret's is a Designated Rural Area and therefore any development of 6 or more dwellings must meet the affordable housing standard. The policy allows for exceptions in individual cases but only if unviability can be verified by a “robust, independent assessment”. This has not been done in this application so it is not compliant with Policy SP5. Since the Bay Trust has in recent years sold off 25 of its affordable housing units, so depriving the community of these much needed resources, (sometimes resulting in evictions of long standing tenants) the proposal for a new development without any required affordable housing would be wholly unacceptable.

11. On page 19 paragraph 7.2 it is stated “ The primary need for accommodation in the current market is for more affordable homes, including 2 bed 4 person and 3 bed 6 person housing, reflecting the needs of first time buyers, the over 50s as well as younger family housing”. The last housing survey carried out in St Margaret’s identified a similar spread of need and concluded that there was a deficit of 44 affordable housing units. Since then the village has lost the 25 affordable rented properties owned by the Bay Trust so the deficit is now likely to approach 70. None of the dwellings in this application are intended to meet the affordable home or starter home standards set out in national and district policies. The Regulation 19 Local Plan specifies that the mix of affordable housing provision in a development should include a starter home at a maximum selling price of £250,000. These proposed 3 and 4 bedroom dwellings in this development would expect to market at least double that figure.

12. The application indicates the lower part of the Glebe Field (38%) will remain open space and be available for public use. But the application also includes the information that this area will remain in the ownership of the Bay Trust. Given the behaviour of the Trust in recent years, of denying the Scouts and the community any access to this field, there can be no confidence that it would be open for public use in the future.

13. On page 21 the section on the Landscape Framework Plan claims that the design will “preserve a sense of space” and that “the scale and massing of the proposals do not dominate the surroundings”. This is the most egregious example in this PDA of trying to claim that black is white. This pair of three storey parallel blocks of housing will, by nature of their bulk, height, layout and design, inevitably present as an urban style development in the centre of a protected green space. They will indeed dominate the view from Glebe Close, Reach Road, St Georges Place and the Village Hall and destroy the open space of the Glebe Field that the community values so much.

14. Section 8 of the PDA deals with sustainability of the buildings. There can be no objection to this element. Indeed all new construction of dwellings should conform to this standard and if the developments for St Margaret’s set out in the Regulation 19 Local Plan go ahead we would expect them to incorporate such measures to preserve sustainability.

15. Section 9 deals with the Landscape Assessment. The Parish Council has already pointed out that this document, commissioned from Knight , Kavanagh and Page and paid for by the applicant, is seriously in error and fails to take into account the functioning of existing open spaces in the village and the historic and amenity value of the Glebe Field to the community. It is a protected open space and should remain so.

16. Section 10 deals with Access, parking and traffic. The first paragraph mentions the need for a pedestrian crossing in Reach Road. The Parish Council has been asking Highways for such crossings for years but all requests have been refused. The second paragraph claims the village is well served for bus services but this is out of date. The bus service to the village has been substantially reduced. The parking provision is 2 spaces per dwelling plus 2 for visitors. This accords with the KCC 2006 guidance. Since that time demographic changes in rural areas, together with loss of public transport, have led to a substantial increase in car ownership and use in villages so this standard is obsolete. The parking provision is likely to be inadequate leading to increased parking on adjacent roads. This will exacerbate the situation on Reach Road causing further congestion at busy times, but most seriously if it leads to parking in St Georges Place it could have a damaging effect on the operation of the Village Hall. This has been explained in detail in the objections lodged by the Village Hall Association and no account of this has been taken in this planning application. It is not clear how much space the entrance to the development will remove from St Georges Place. Reduction of parking provision in this road could cause serious problems for the Village Hall.

17. Section 11 deals with strategy for biodiversity in the open space. While we commend the principle of promoting biodiversity in any development it cannot be argued that placing two large building blocks in the middle of the field with associated ecological measures can be better for biodiversity than conserving it as a natural meadow. Paragraph one contains this improbable claim: “The landscape and the development generally will form the context for a process of environmental education for the village which

is part of the remit of the Bay Trust". Although the Bay Trust is an environmental education charity there has never been any process of environmental education "for the village". References in one document to contribute to environmental measures in the Village Neighbourhood Plan are misplaced as St Margaret's does not have a Neighbourhood Plan. It did in 2012 look at options for a Neighbourhood Plan but there were never any development sites put forward. The Bay Trust activities, since it changed from The St Margaret's Bay Trust, have switched to provision for people outside St Margaret's. The fencing off of the Glebe Field in 2016 suggests that the current Bay Trust is unsympathetic to the Parish Council, the Scouts and the local community. Its accounts published since 2014 indicate that it has been losing very substantial sums of money every year since then and the charity is currently under formal complaint of financial mismanagement, by two senior accountants, to the Charity Commission. The notion that the Bay Trust will use the development of the part of the Glebe Field it proposes to keep for the purpose of a process of environmental education for the village can be classified as fiction. The same could be said for many other claims in this Planning, Design and Access Statement.

For all the reasons outlined above the Parish Council strongly objects to this amended application and will always oppose any attempt to change this protected open space to housing development.