

Walmer Parish Council

Submission to

Dover District Council's Draft Local Plan Consultation Document

Introduction

Walmer Parish Council's submission follows the chapter headings in the consultation document *Dover District Local Plan Regulation 18 Draft A bold vision for 2040*, beginning with Chapter 3. General comments are provided in plain text with quotations from the draft Local Plan shown in italics. Suggested amendments to policies and background text are shown in bold type. Reasons for any proposed changes are shown in plain type.

General Comments

The draft Plan contains a large number of laudable statements and aims particularly in the Vision and in Strategic Policy 1 but there is a lack of confidence, based on up to 40 years of experience, in DDC's ability to deliver. There is also a lack of confidence on DDC's ability to stick to and enforce its own policies, again based on experience.

According to paragraphs 5.38 and 5.39 of the draft Plan, climate change is a key theme and central to the economic, social, and environmental dimensions of the Plan. That mitigation and adaptation to climate change is a legal requirement is acknowledged at paragraph 5.5, but paragraph 5.24 takes a very defensive attitude to the need for climate change policies. Climate change mitigation and adaptation should be central to land use planning over the Plan period and should be seen in every policy throughout the Plan. Sadly, it is not.

The economic future of the district seems, as previously, to be based on house building to attract the grey pound rather than to enable young people to stay in the area. Though there are occasional warm words about pharmaceuticals and culture, there is no overarching vision to create a vibrant, resilient and sustainable economy for the district. The

impression given is that, like Oliver Twist, the district would be grateful for just a little more, and it doesn't matter what it is as long as it fills a few bellies.

There is also a lack of realism, particularly in relation to transport, which reads more like a tourism leaflet than a realistic appraisal of the district's actual transport facilities.

Chapter 3 Spatial Portrait

Population

Figures 3.2 and 3.3 compare the population pyramids at the 2011 census and then at the 2018 estimate. This shows that the population of Dover District is ageing. The figures also demonstrate that the younger elements of the population (15-19 in 2011) have not been retained. Nevertheless there has been a total cumulative migration of 6,265 persons into the district, 80% of whom were internal migrants (i.e. from elsewhere in the UK). The cumulative total of internal migration is significant over the period, as is shown in Fig. 3.4.

The Local Plan admits that the bulk of the in-migration is made up of people who are middle-aged or older. It is more coy, not to say silent, about the loss of younger people from the area.

The nature of the population and its dynamics drive the housing market (see below) but the population dynamics suggest that housing is being provided for retirees from more affluent areas and that economic growth is to be based on the grey pound.

Health

This section covers a number of health indicators but would have been better entitled "**Deprivation**". There is a facile equation between children in low income families (19.4%) and childhood obesity (19.1%) implicit in paragraph 3.7.

Climate

DDC's declaration of a Climate Emergency and the creation of a Climate Change Member Working Group as well as DDC's commitment to being a zero-carbon council by 2030 and a carbon neutral district by 2050 is welcomed. Paragraph 3.13 emphasises the problem of water resources in an area which receives low rainfall and is dependent on groundwater extraction, but there is little clarity in the rest of the Plan about the planning mechanisms to be employed to maintain, let alone enhance, the district's water supplies.

Housing

The Deal area has taken the brunt of housing development over the previous Plan period, while "*Dover*" (including Whitfield etc) has under-delivered on house building targets. It does confirm that Dover District has a higher than national average of council housing in its housing stock, though overall its social housing stock is below the national average.

The district has 1,448 vacant properties of which 1,257 are second homes. In Fig. 3.2 the proportion of second homes is given as 2.3% but in the text immediately above the percentage is given as 2.1%.. Vacant properties of both types have increased in number over the last 5 years.

The clear conclusion of this section, taken with the section on population, is that there is a need for social housing stock and that there are vacant properties which can provide some of the commercial housing needs if released by owners.

Economy

There are fewer people employed in professional or technical roles than the Kent average and more in transport, public administration and manufacturing. The district has changed to being a net exporter of employees from a state of equal inward and outward movements of labour.

Levels of educational attainment have improved, though from a low base, and are still lower than the Kent and national averages.

There is little in the Plan which indicates any urgency in tackling the lack of skills.

Transport

The district is described as being “*highly accessible by rail, road and sea*”, whilst it also claims that the district has high speed rail connections to London, when the reality is that HS1 trains pass through the district and are high speed only from Ashford. There is no discussion of the capacity of the A roads within the district or of other forms of transport at this stage in the document, nor is there mention of the problems caused by cross-Channel transport delays to communications in the immediate hinterland.

Natural Environment

The document lists the various designations of protected landscapes and a number of “*Green (sic) infrastructure sites*” which include parks and gardens as well as nature reserves.

Historic Environment

The document refers to the district’s listed buildings (just under 2,000), its 48 scheduled ancient monuments, 57 Conservation Areas and 12 museums. The national and international importance of some of the district’s historic assets is noted, as is the impact of the mining industry and the involvement of Abercrombie in the design of Aylesham.

Comments

This Chapter is very much a picture of the state of the district but it shows little sign of ambition, perhaps a reflexion of size and positioning of the Plan’s subtitle “A bold vision for 2040” on the cover.

The programme of house building envisaged by the document seems designed more to satisfy the needs of older people moving into the area rather than being aimed at helping to retain younger people in the district.

Similarly, though the levels of educational attainment have improved, there appears to be no intention of using the Local Plan to improve that position further by, for example, specific policies to encourage higher education establishments to develop facilities in the district, and thereby to develop a knowledge based economy beyond the former Pfizer’s site.

This would contribute to raising the average level of earnings in the district and to combating the high levels of deprivation experienced in some wards.

The passage about transport seems very much at odds with the lived experience. HS1 trains travel through the district but are not high speed. The principal road system, terminating at the port of Dover, is subject to delays during bad weather or other exceptional circumstances, and the local roads are inadequate, though not as inadequate as public transport or cycling provision.

Proposed Amendment

The single paragraph on Transport and Infrastructure (para 3.30) should be expanded in order to outline the problems involved in the modal shifts from road to sea within the District and from road to rail outside the District. This would make it easier to argue for the necessary improvements to the A2 and for the bifurcation of traffic on the two main arterial roads coming into the port, the A2 and the M20.

The brief introductions to the natural and historic environments lack ambition despite the references to their national and international importance which could be taken advantage of in order to strengthen both the knowledge based and tourist economies.

Chapter 4 Vision and Objectives

This Chapter identifies 4 aspects which comprise the “*Overarching Vision*”. They are introduced by the statement: “*Dover District in 2040 will be a place of aspiration*”, the subtext being that it the District’s only aspiration in 2021 is to have some aspiration by 2040. The 4 aspects are as follows:

Prosperous Economy

In part, this prosperous economy will build on local entrepreneurial talent. However, as the previous chapter showed, there is a loss of local young people and a lack of educational attainment among remaining local people which this Plan shows little evidence of intending to alter.

The district's ability to attract new businesses is reliant on a "21st century infrastructure" and "unrivalled transport connections with London and Europe". Again, the lived experience is that, though the transport connections may be unrivalled when functioning well, they are far from adequate when any stress is placed on any one transport mode.

The attractiveness of the district for visitors is clear but there is little in the Plan to suggest that by 2040 the district will possess "a diverse range of high-quality accommodation" for visitors.

Vibrant Communities

Apart from offering new developments that "respect the spectacular natural environment ... of the District", it also offers "a supply of new homes that meets people's needs and where affordable and local housing is prioritised". This is difficult to reconcile with the proposal to build houses over the catchment area of the aquifer to the south of Deal (DEA020) or with the scale of internal migration into the area as shown in Chapter 3 (Figs 3.2 and 3.3). This section also claims that there will be improved educational facilities though these are not apparent in the Plan, just as the means of delivering "extensive" green spaces and an "enhanced network of dedicated walking and cycling routes" are elusive.

Thriving Places

According to this section, "Dover town will be thriving with a strong core of local shops and services", which statement is at odds with the current moves to on-line shopping. The reference to "regenerated areas of existing housing" is promising but is not borne out by the housing policies for Dover which rely on substantial new build on green fields north of Dover.

Deal and Sandwich are apparently to benefit from investments in culture, though again there is no evidence of how this will be delivered in the context of the Plan.

Proposed Amendment

A specific policy to encourage the establishment of culture and knowledge based industries should be added at the appropriate chapter(s)

The villages across the district will be provided with “*improved community facilities and housing opportunities, enabling more young people to stay*”. Again, given the level of internal migration and lack of commitment to maintaining levels of affordable housing within existing commercial housing developments, this seems unlikely.

The issue of housing needs greater clarity. It would appear that building houses is an objective in itself, whereas what is required is housing that meets the needs of local people to underpin the economy. This requires the focus to be placed on social housing, whether council or housing association, rather than on commercial private sector housing.

Spectacular and Sustainable Environment.

It is instructive that this section is the last, rather than the first, of the aspects of the Plan’s Vision. It is erroneous to claim that “*the climate change emergency will have delivered increased opportunities for local food production, extensive tree planting and the adoption of sustainable design*”. The climate emergency will allow for changes to local food production but, if measures are not taken through the Plan to safeguard and enhance water supplies and storage, it is more likely to reduce local food production.

Strategic Objectives

Strangely, the 4 aspects of the Overarching Vision are altered for listing of the strategic objectives which become Prosperous Economy; Vibrant Communities; Spectacular and Sustainable Environment, and Cross Cutting Issues.

There is nothing fundamental within the Vision or the Strategic Objectives to object to as they are all desirable outcomes. However, apart perhaps from a greater use of the words “*sustainable*” and “*sustainability*” there is little to distinguish the vision and objectives of this Plan from previous Local Plans.

Comments

The bulk of house building is actually to provide for internal migration into the district.

That in-migration is mainly of middle-aged and retired people who by the end of the Plan period will have required additional health and social care services.

The district has become a net exporter of young people, and of working-age people, generally, a factor which runs counter to the intention of creating a prosperous economy within a series of vibrant communities.

There is a need not just for affordable housing within the private sector but for social and council housing, rather than for purely commercial builds.

There is no apparent USP or coherent group of selling points within the Plan which might persuade businesses or major institutions to invest or for young people to remain in the area.

The view expressed in the Plan of infrastructure in general and transport in particular is very much at odds with the lived experience of residents and users. A more realistic portrayal of the problems of co-existing with the modal shifts required by transport locally would give greater confidence in the ability of the Plan to deliver the objectives and the vision.

There is an opportunity to put the environment and the principles of sustainability at the forefront of the Plan's vision, rather than as an apparent add-on to the 4 aspects of the vision. A prosperous economy, vibrant communities and thriving places all depend on a sustainable environment.

Proposed Amendments

The Spectacular and Sustainable Environment should be the first of the 4 aspects of the Vision, followed by Vibrant Communities, then Thriving Places and finally a Prosperous Economy, as a prosperous economy can only be delivered with the other elements in place (para 4.1).

Chapter 5 Climate Change

It is unclear from DM Policy 1 why an unambitious target of 31% reduction in carbon emissions has been chosen and whether this will be progressively increased, as needs to be done to achieve government targets. Equally unambitious is the use of Future Homes Standards and BREAM Very Good for fear of putting off developers. DDC should show leadership. BREAM Excellent would produce a further 10% decrease in carbon emissions.

Proposed Amendment

Replace “*BREAM Very Good*” with **BREAM Excellent**, and insert a series of timed increased reductions in carbon emissions for residential properties.

DM Policy 2 has a lot in it which is laudable. However, the view in paragraph 5.11 that “Sustainable design and construction measures can often increase the cost of development” is unacceptable. There are increasing numbers of affordable homes projects around the country which are built to Passivhaus standards.

Proposed Amendment

Paragraph 5.11 should at least be balanced with the addition of **“Sustainable design and construction does, however, result in long-term savings to the residents of the homes themselves and benefits the wider community by reducing carbon and other emissions and conserving water resources.”**

It is disappointing that DDC has not allocated any sites for renewable and low carbon energy production, though councils can do this and there are clear financial and environmental benefits in so doing. This seems to be on the basis that no developer or landowner has come forward with such proposals (paragraph 5.30). Policy DM3 appears to be written to make the provision of renewable energy unachievable.

DM Policy 4 (Sustainable Travel) provides a fair basis for the promotion of sustainable travel within development sites and at off-site locations and the general tenor of paragraphs 5.50 to 5.52 is welcome. The Policy

is quite precise in terms of the provision of EV charging points (DM4 (d)) but less so in its other provisions.

Proposed Amendments

DM Policy 4 (c) could be strengthened to read: *“Be readily accessible by sustainable transport modes through the provision of high-quality, **engineered**, safe and direct walking and cycling routes within the permeable site layout..”* This would make clear that cycle ways, for example, should be more than a painted line on the road surface.

DM Policy 4 (d) would benefit from the addition to the existing draft of the following: **“For all other types of residential, commercial, industrial and retail development, one electric vehicle charging point will be provided for every 10 parking spaces required, with cabling infrastructure capable of at least doubling this provision to meet future needs.”**

DM Policy 4 could also be improved by the following final statement: ***“The Council will safeguard and enhance the rights of way network and other cycle and walking routes from developments that would otherwise compromise their use.”***

The Tree Planting section of DM Policy 9 is welcomed. However, given this Council’s practical experience of DDC’s handling of TPO applications, the section on Tree Protection and Replacement requires strengthening at paragraph (g) by the following amendments: **“Trees protected by Tree Preservation Orders will be retained wherever possible unless: A. It can be demonstrated by a qualified arboriculturalist approved by the council and at the developer’s cost that they are dead, dying, diseased or represent a hazard to public safety; or B. The Council deems the felling to be acceptable under the terms of the Council’s published policy on tree management; or C. The benefit of the proposed development demonstrably outweighs the benefits of their retention.”**

The proposal for new build housing to have higher water efficiency standards, DM Policy 5, is welcome. However, achieving a maximum use of 110 litres per person per day is unachievable across the district given the quality of existing building stock and the lack of incentives to

improve properties. An amendment to DM Policy 16 (residential extensions and annexes) could assist, on the lines of an addition such as: **“f. the provision of water and energy saving measures have been incorporated into the design and layout of the proposed new build and consideration has been given to water and energy efficiency measures in the original structure.”**

Policies DM5, 6 and 7 are welcome, though the best way to avoid flood risk and manage surface water is to ensure that rainfall reaches the aquifer rather than building over areas (such as DEA008 and DEA020) that allow rain water to percolate down.

Proposed Amendment

Policy DM 8 could be improved by adding the following: **“Only essential business proposals will be allowed in vulnerable areas and they must show that their processes are not likely to create to pollution risks in the event of coastal or other flooding.”**

Policy DM9 provides a starting point towards tackling the district’s lamentable lack of tree cover (4.8% compared to the national average of 13% and a target of 17%). Replacing one mature tree with two young trees will take years to generate the same level of carbon sequestration and there is no indication in the policy regarding the size and maintenance regime of the replacements. Equally there is little faith in DDC’s ability to protect TPO’d trees.

Proposed Amendment

Insert the word **“standard”** before each reference to replacement tree(s). Whips will not be acceptable.

Chapter 6 New Homes

Walmer Parish Council would challenge the Government imposed house building target laid out in SP 2, as this target is not related to the actual needs of the district and, if implemented, will result in a serious imbalance of older residents over younger residents.

Walmer Parish Council is opposed to the allocation of housing at DEA008 and DEA020 (Site Allocations Policy 1). Apart from the negative impact on the landscape and visual amenity of the area and the inadequate road system, these sites lie over the entrance to the aquifer supplying Deal and adjacent villages.

Walmer Parish Council is also opposed to the allocation of housing at WAL002 (in Walmer parish) and at KIN002 as both sites lie along the line of a potential wildlife corridor which would link land held by the National trust in St Margaret's parish, land held by Ringwould with Kingsdown Parish Council (the Freeddown and the Lynchetts) and held by this Parish Council at Hawksdown, by English Heritage at Walmer Castle and by DDC at Marke Wood.

Proposed Amendment

Remove DEA008, DEA020, KIN002 and WAL002 from Site Allocations Policy 1, as they are undermine policies elsewhere in the draft Plan.

The requirement, in DM Policy 12, for "*not less than 30% of the total housing provided*" on residential development sites to be affordable is welcomed, as is the extension of that stipulation to sites of 6 houses in rural areas. However, part 2 of the policy allows developers to retreat from that position if they can demonstrate that the project is not financially viable. Ideally this policy should be amended to: "**If an approved development project is demonstrated to be not financially viable, then any permission should be revoked**". If the development project is not financially viable, it follows that the developer has not been competent in seeking permission in the first place or is simply land banking the site. If it is considered appropriate to revoke a permission, then part 2, paragraphs b to e inclusive should be amended "**to require an absolute minimum of 25% as a proportion of affordable housing or its financial equivalent.**"

The proposal under DM12 that Dover Urban Area applications should be exempt from the provision of this policy is unacceptable. Essentially, the Council is saying that Dover is too poor to merit any further affordable or social housing, even though the existing housing stock in Dover is generally of a low standard of construction.

The intention to involve parish councils in rural local needs housing assessments in DM policy 13 is generally welcomed, though it must be made clear how the information necessary for parish councils to carry out meaningful rural housing needs assessments will be made available to the parish councils and which authorities will bear the costs of carrying out the work. It should not be another example of DDC passing its workload and costs on to the parish councils.

Chapter 7 Employment and Local Economy

Much of this chapter is not directly relevant to Walmer Parish Council though a thriving economy and a pleasant environment throughout the district are clearly beneficial to Walmer's residents.

Proposed Amendments

Strategic Policy 8. Add the following to the first paragraph in this Policy, after the words "*economic growth in the District*": "**...provided that measures are put in place to ensure no negative impact on the blue and green infrastructure.**"

With regard to DM Policy 24, it is surprising that no regard has been given to AirBnB type businesses and this should be addressed. Also the restriction of proposals for conference and exhibition facilities, potentially in association with hotel development to the Town Centres is frankly perverse, assuming that the Town Centres are those defined in Chapter 8. This part of DM24 should be amended to read; "**Proposals for conference and exhibition facilities, potentially in association with hotel development, will be supported subject to other Local Plan policies.**"

Chapter 8 Retail and Town Centres

Generally, this Chapter has little direct relevance to Walmer Parish Council as it concentrates on the three principal shopping centres of Deal, Dover and Sandwich. It would, however, be prudent to review the boundaries of these three retail centres at the midpoint of the Plan

(2030/31) given the apparent changing pattern of retail in the wake of a shift to online shopping.

Proposed Amendment

Add to DM25, **“The boundaries of the three primary shopping areas will be reviewed at the midpoint of the Plan’s life time in order to take account of changes to the retail sector.”**

Policies DM 26, DM 27 and DM 28, which are relevant to Walmer Parish council are acceptable.

Chapter 9 Transport and Infrastructure

Paragraph 9.4 identifies getting *“the right infrastructure .. in the right place, at the right time”* as integral to the success of the Plan, which would certainly be welcome but requires a degree of firmness by the District Planning Authority in dealing with developers that has been notably absent to date.

Paragraphs 9.5 and 9.6 promote the shift from private car to alternative means of transport and paragraph 9.6 focuses on issues such as reducing air pollution in the context of the *“climate change emergency”*.

Paragraph 9.7 identifies the need to work with partners to improve strategic traffic management in and around the port of Dover, whilst paragraph 9.13 discusses the policy options with regard to the upgrading of the A2.

Paragraph 9.14 points to the current lack of parameters for when Traffic Assessments and Travel Plans may be required, and paragraph 9.15 states that the Council’s preferred option is to assess levels of severe cumulative traffic impacts on a case by case basis. Paragraph 9.16 considers that a North Deal A258 Connecting Road is not appropriate at this time but might be in the future. Paragraph 9.16 should rule out this destructive fantasy.

Paragraph 9.26 highlights the need for infrastructure, particularly transport infrastructure, and paragraphs 9.27 to 9.29 point out the difficulties of establishing what infrastructure is required to support each

potential new development. Paragraph 9.30 concludes that infrastructure is best provided by Section 106 agreements rather than by a Community Infrastructure Levy (CIL). This underpins Strategic Policy 13 which concludes by stating that *“In determining the nature and scale of any provision, the Council will have regard to viability considerations and site-specific circumstances.”*

This statement, in effect and in practice, has allowed developers to reduce progressively the Section 106 payments proposed and other conditions imposed on developments at the time of granting permission by suggesting that their potential developments are not financially viable once all the constraints have been factored in. A CIL would provide developers, planners and residents with the certainty of knowing what the community costs would be.

Proposed Amendment

It is not the Council’s role to have regard to any planning application’s financial viability. It is the responsibility of the applicant to have in place sufficient funding or access to sufficient funding in order to realise the project. It is the Council’s responsibility to determine the use of the land and the conditions which make that use appropriate. Paragraph 9.30 should be re-written to signal the Council’s intention to implement a CIL before the Plan has run a quarter of its projected course, and a further sentence should be added to SP13 stating that: **“The Council intends to introduce a Community Infrastructure Levy as soon as possible but before 2025 so that the council, developers and residents can more clearly understand the community costs of any agreed planning permission.”**

Paragraphs 9.31 to 9.34 deal with the need to dual the A2 in order to provide additional highways capacity to and from the Port of Dover, while paragraph 9.34 deals with the High Speed rail line and the possibility of reducing travel times still further to London and, at the same time, improving rail capacity locally.

These paragraphs introduce Strategic Policy 14 which is very specific in that it considers only the improvement of the A2 for motor vehicles.

Proposed Amendment

In paragraphs 9.31 to 9.34 no consideration is given to the need for improvement highways linkages between the two principal roads entering Dover (the M20 and the A2) elsewhere in Kent, so that, if there is a blockage on one route, traffic can be switched to the other thus avoiding build-ups of traffic. Nor is there any effective consideration of alternative transport routes crossing a dualled A2.

SP14, as its title suggests (Strategic Highways Infrastructure) makes no reference to the High Speed rail or to any other rail improvements. Rail is omitted from DM 4 (Sustainable Travel)

SP14 should be re-titled “**Strategic Transport Infrastructure**”. SP14 contains a sentence which is unclear – “*Proportionate developer contributions will be sought from new development for which this mitigation may be necessary*”. It is unclear what “*this mitigation*” refers to in the immediately preceding sentence.

*SP14 would benefit from the addition of the following: “**Proposals which assist in the provision of alternative transport modes across a dualled A2 will be encouraged. The Council will work with Highways England and Kent County Council to improve accessibility elsewhere in Kent between the two principal access routes to the Port of Dover, the M20 and the A2. The Council will work with partners to improve access to the local and High Speed rail network.**”*

Paragraphs 9.36 to 9.40 cover local highways and paragraph 9.37 makes clear that further work is required to identify what needs to be done to improve the local highways network around those areas which have been identified for future developments. Paragraph 9.38 states that a transport statement or assessment will be required for relatively small housing development sites, and Paragraph 3.39 speaks of the desirability of travel plans being submitted alongside planning applications.

This leads on to DM Policy 29 (The Highway Network and Highway Safety). The reference to cumulative impacts is welcome, but this is qualified by the word “*severe*”. Similarly, the policy talks of “*significant*

traffic movements". Neither term is defined. Developments in any of the strategic or non-strategic housing allocations will give rise to "*significant*" traffic movements where those developments are larger than 15 units as the traffic generated will be cumulative to the existing traffic within the existing built area.

Proposed Amendments

It is proposed that the following wording replaces the final sentence in DM Policy 29, in order to clarify levels of significance or severity of increased traffic: "***A Travel Plan or Transport Assessment will be required for all residential developments of more than 15 units, the requirements of which will be secured by planning conditions, Section 106 agreement or through the Community Infrastructure Levy as is appropriate.***"

With regard to open space provision the standards set out in DM Policy 31 should be seen as the barest minimum, and this should be made clear in the policy.

DM Policy 32 appears anachronistic with its focus on playing pitches. Provision within the Policy should be made for outdoor gyms, skateparks and multi-use games areas.

The other policies in this chapter appear acceptable.

Chapter 10 Design

Paragraph 10.5 lists the Government's key priorities for good design, two of which ("*Homes and buildings – functional, healthy and sustainable*", and "*Resources – efficient and resilient*") are missing from Strategic Policy 15, while the second is absent from DM Policy 36.

Proposed Amendment

Add to Strategic Policy 15 and DM Policy 36 an additional statement that all developments must "***demonstrate that sustainably sourced materials are used in construction of any new build.***"

Standard room sizes are currently at their lowest since the Victorians built slum housing but DM Policy 37 merely requires developers to build to the “*governments (sic) latest Nationally Described Space Standards*”. DM 37 also requires only 5% of houses on developments of over 20 homes to be wheelchair accessible. Given that the majority of existing homes within the district are not wheelchair accessible and given the underlying but unarticulated policy of building new homes for older people from out of the area, this seems short-sighted.

Proposed Amendment

DM 37 c Be in excess of the government’s latest Nationally Described Space Standards in respect of Internal accommodation.

DM37 d On all developments at least 25% of the development shall comply with building regulation M4(3) (wheelchair accessible homes) with the remaining development to be built in compliance with building regulation M4(2).

Chapter 11 The Natural Environment

It would have been helpful if the Environment Agency’s Flood risk map could have been incorporated into Fig. 11.1, as that would assist developers and residents in understanding the extent of an important environmental constraint. It would also be helpful with regard to comments on the Lydden Valley in chapter 12 below.

Proposed Amendments

Add the Environment Agency’s Flood Risk map data to Fig. 11.1.

Strategic Policy 17 is generally acceptable though it could be strengthened by a rewording of the Policy’s second paragraph:

“Development which would result in the loss of or deterioration of irreplaceable habitats, including ancient woodland and ancient or veteran trees and hedgerows, will not be permitted unless it can be clearly demonstrated that the public benefit would outweigh the loss or deterioration and that a suitable sustainable compensation strategy exists.”

Though hedgerows are mentioned in the third paragraph almost as an afterthought, they are important features in the landscape providing nesting sites for birds and other small animals, diversity of flora, absorbing pollutants, and reducing soil erosion, as well as reflecting historic land holding and management patterns.

The 10% biodiversity net gain is provided for at a national level. The draft Plan can and should go further by proposing a 20% biodiversity net gain. According to DM Policy 38 this biodiversity net gain should only be expected to last for 30 years. This is unambitious.

Proposed Amendment

In DM Policy 38 the figure of 10% should be replaced with the figure **20%** throughout the Policy. The figure of 30 years should be replaced by the figure of **50** years.

The other policies in this chapter are accepted.

Chapter 12 The Historic Environment

This Chapter is generally very positive in terms of the draft policies for the protection and enhancement of the historic environment. There is, however, a requirement for a specific policy dealing with any developments within the Lydden Valley/former Wantsum Channel, the evolution of which may well be germane to our understanding of the creation of the English Channel (see below). The specific policy for Dover Western Heights is welcomed.

Strategic Policy 18 is supported.

DM Policy 44 is welcome in that it refers not solely to the heritage asset but also to the setting of the asset. There is also a requirement for a Heritage Statement where a "*heritage asset or its setting*" are likely to be affected. The whole building approach to developments involving energy conservation improvements is to be welcomed.

Where DM Policy 44 is weak is that it does not explicitly require conservation of an asset by recording. A suggested addendum to this policy would be at the end of the third paragraph: "... **securing the**

optimum viable use of the heritage asset or ensuring its preservation through appropriate recording.” This would link DM Policy 44 more directly to DM Policy 46.

Proposed Amendment

DM Policy 45 Conservation Areas is generally welcome though the introductory sentence should be strengthened to read: “*Applications for development or redevelopment in Conservation Areas will **only** be supported provided that such proposals preserve or enhance the special architectural or historic character and appearance of the Area and its setting.*”

Within this Policy, however, consideration should be given to reducing heat and energy loss and to sensitive solutions to providing energy efficient heating systems by adding a suitable further bullet point along the lines of: “**Employ sustainable heating systems, such as ground source heating, and means of reducing energy and water consumption as are compatible with securing the sustainable future of the Area and its setting.**”

DM Policy 46 Archaeology is welcome.

DM Policy 47 Dover Western Heights Fortifications Scheduled Ancient Monument and Conservation Area is supported, as it rightly emphasises the importance of the intervisibility of features both within the monument and within the wider landscape in order to fully understand the historic significance of the monument.

DM Policy 48 Historic Parks and Gardens is welcome.

The Lydden Valley/former Wantsum Channel is identified in Chapter 11 as forming a group of Landscape Character Types ((LCTs A, B and C) paragraph 11.42 and Table 11.1). Elsewhere in Chapter 11 the concentration of National Nature reserves, SSSIs and Special Protection Areas where the Wantsum meets the English Channel is demonstrated in map form (Fig. 11.1). Historically, it is known that the Wantsum Channel provided, from time to time, a route for water borne traffic avoiding the more difficult waters around the North Foreland. Little is known of the evolution of this Channel and its silting up. As an area of more or less open water and marsh at different periods in the past,

various historic artefacts might be expected, such as fish traps, landing stages, salt working sites, temporary or permanent settlements taking advantage of the varied environments, and perhaps water craft. Ground disturbance along the line of the Wantsum Channel and its edges are likely to produce organic palaeo-environmental evidence which will add to the limited inorganic palaeo-environmental evidence from sites on the chalk downland. This material could include timber structures and artefacts, vertebrate and invertebrate fauna, pollen, and aSedDNA, all of which would add to an understanding of the district's archaeology.

The Wantsum Channel is generally assumed to have been an open channel between the mainland of Kent and the Isle of Thanet, but how that channel arose in the first place is unknown. Given recent research into the creation of the English Channel, it may well be that the Wantsum Channel was created by the same tsunami, caused by the Storrega underwater rock slide, that obliterated Doggerland and carved out the present English Channel around 8,000 BC. The area potentially has immense national and international importance for understanding the late Palaeolithic and Mesolithic periods as well the development and use of the landscape in more recent periods.

The inclusion of a specific statement and policy for the Lydden Valley/Wantsum Channel and its margins would appear appropriate, matching that for the Dover Western Heights and the Dover Town Centre SPD. It is suggested that the following statement is inserted after paragraph 12.29:

“12.30 The Lydden Valley/Wantsum Channel provided a water route south of the Isle of Thanet avoiding the more difficult waters around the North Foreland at various times in the historic past. The origin of the Wantsum is unknown but may be linked to the formation, around 8,000 BC, of the English Channel as we know it today. Ground disturbance within the Wantsum and along its ancient shore line is likely to reveal evidence of the origin and development of this important landscape feature as well as evidence of its use from the Mesolithic through to the present day.

DM Policy 48 The Lydden Valley/Wantsum Channel

Proposals for development within the Lydden Valley/Wantsum Channel which make provision of appropriate archaeological and supporting palaeo-environmental investigation prior to development will be supported. For the purposes of clarity the limits of the Lydden Valley/Wantsum Channel's archaeological and palaeo-environmental area of interest will be co-terminous with the limits shown on the Environment Agency's Flood Risk Map."

Paragraph 12.30 and Policy DM 48 Historic Parks and Gardens, which are supported, should be renumbered accordingly to take account of the proposal above.