



NONINGTON PARISH COUNCIL DDC LOCAL DEVELOPMENT PLAN COMMENTS



Fredville Park Nonington 2020

prepared by
Nonington Parish Council
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OBJECTION SUMMARY

An LDP must be held accountable for tomorrow. A robust, objective assessment of all evidence forms the basis of a sound LDP. The law dictionary defines “objective” evidence, as evidence based on facts and not subject to bias. In our review of the LDP we have identified apparent gaps in the evidence base considered (e.g. Extra DDTM area traffic data) and a high level of assumption interdependency leading to a confirmation bias across the plan documentation. DDC’s Traffic Consultant, WSP, call this the ‘**uncertainty log information**’ when describing the housing and employment numbers DDC provided.

Significant questions about the LDP evidence base and the robustness of the methodology employed in both the Sustainability Assessment and the DDTM were raised by our LDP review. We have requested clarification from DDC on a number of points and wait on their response. Our submissions is, therefore, based on the data we currently have. Our comments on the draft LDP are set out below and in the attached report and for the purposes of the Reg 19 Consultation, all evidence provided should be considered in the round.

PLAN SUSTAINABILITY

DDC’s 2020 Local Plan (Reg 18) Sustainability Appraisal states that to be sustainable ‘*housing development should, where possible, be concentrated in the three urban centres of the district, Dover, Deal and Sandwich*’. and should ‘*maximise the development of brownfield land.*’ Does the draft LDP meet these goals? In short, no.

- 100% ONS 2018 projected population growth in Dover is from net inbound migration. 3 Dover District towns are in Kent's top 50 locations to buy. **Dover** is 26th, **Sandwich** 12th and **Deal** the 9th best locations in Kent to buy. Along with district’s villages, these towns provide the focus for inbound migration.
- Rather than being concentrated in the urban centre of the district, only **14.4%** of all LDP housing is in **Dover** (9.1%), **Sandwich** (2.7%) and **Deal** (2.3%).
- **67%** of all 11,920 new proposed dwellings are located in 3 environmentally damaging Greenfield sites in just 2 of the District’s wards. 1,725 in Aylesham, 5,750 in Whitfield, 350 in Elvington (with 200 in Shepherdswell and Nonington also in this electoral ward).
- From ONS data to SA commuter patterns and to SHMA 2017 all highlight a strong trend of out-commuting. ONS data shows high car reliance in all major strategic site locations.
- The LDP split between Greenfield v’s Brownfield across the district and in Dover, Sandwich and Deal is unknown. Clarification on has been requested from DDC. In the absence of further information it is assumed to be <15% of total.

The decision to focus dwelling distribution in environmentally destructive, car reliant out of town Greenfield developments is not dictated by central government. It is a policy decision made by DDC.



With < 15% of all LDP dwellings in the towns of Dover, Deal and Sandwich and >70% dwellings in Greenfield sites, the dwelling distribution in the LDP doesn't align with the sustainability benchmark set out in its own SA.

In seeking to make the LDP's dwelling distribution comply with NPPF sustainability guidance, DDC have altered the district's settlement hierarchy (using SA transport evidence) and combined Dover and Whitfield for environmental impacts and Aylesham and Sandwich for employment sites. With insufficient traffic data for 2 of the 3 major strategic LDP housing sites, there is no proportionate evidence base available against which to properly evaluate the sites in Aylesham and Elvington.

NONINGTON TRAFFIC IMPACTS

Nonington is situated on an 8 mile stretch of road that connects the A256 and Sandwich in the East with the A2 and A260 Folkestone Road in the West, running directly south of the proposed Aylesham site. It also the quickest route from Elvington to the A2 via Mill Lane.

A 1.2 mile section of this 8 mile route runs through the village of Nonington and is characterised by single car width access pinch points, blind corners and stretches with no pedestrian walkways.

As highlighted in Dover District Council Draft Dover District Local Plan (Reg 18) Sustainability Appraisal sections 4.56 and 4.57, the districts in / out commuting patterns data drive traffic to Dover or Sandwich or externally to Canterbury, Folkestone, Ashford and Thanet. Whether traffic from Aylesham to Sandwich and Thanet or traffic from Sandwich, Eastry and Elvington, heading to Canterbury, Folkestone and Ashford, Nonington is en route. These journeys are modelled in sections 5.3 and 5.4 in the attached report.

The LDP proposes an additional 1700 houses in Aylesham (including extant) and 350 in Elvington. The LDP commits to refusing developments that generate 'severe cumulative residual impacts in terms of capacity and road safety'. **DM Policy 29:** The Highway Network and Highway Safety states '*Traffic generated by development should normally be targeted towards the primary and secondary route network in the District. Other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements*'. This should afford protection to Nonington as should **NPPF paragraph 109** and **paragraph 84** providing that adjacent development does not have an unacceptable impact on local roads along with **DM Policy 45** in the Easole Street Conservation Area.

However:

Despite the Ministry of Housing, Communities & Local Government 2020 LDP guidance stressing the importance of contextual data such as travel to work areas and that evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively, none of this evidence has been considered in the LDP strategic site allocation in relation to Aylesham and Elvington.



1. In their Sustainability Appraisal of Growth Options in the Dover District Council Local Plan Topic Paper: Overarching Strategy (Part 1) point 1.5. DDC undertook to 'assess growth options in terms its likely effects on environmental...using available evidence and considering factors such as: Commuting patterns, transport infrastructure, traffic congestion (and related air quality and carbon emissions issues)'. This appears not to have happened in relation to Aylesham and Elvington's strategic sites.
2. WSP's DDTM (Reg 18 Traffic Plan Assessment 2020) 513 page report conducted detailed modelling of the Dover and Deal traffic. Other areas were '**modelled in significantly less detail**'.
3. Despite recognising the LDP 'leads to large increases in flow' in Aylesham, WSP's analysis was, in practice, limited to a handful of ATC's (automatic traffic counters) on the B2046. WSP's report offered no conclusions on the area north of the A256 as it was outside the DDTM area.
4. The Elvington 'evidence' is even less robust. It consists of some manual data counts (shown in yellow). By citing proximity to A256, the implicit study assumption is that the A256 is the primary route used. No empirical data collected on the traffic heading to the A2 / M2 / M26 or M25 from Elvington.
5. WSP explicitly recognised the porosity between the B2046 and the adjacent rural road network, yet provided no analysis of (1) the rural road capacity restrictions or (2) of baseline cumulative traffic from development to date or (3) the projected increase on the road network from the LDP.
6. The Highways England approved matrix information from the South East Regional Transport Model (SERTM) used by WSP in Deal has not been employed on Aylesham and Elvington. There is an extensive resource of rural road network ATC data from Aylesham's s106 TA's (2007/ 2014/2018 etc.) that could have been consulted.
7. WSP modelling of traffic for Policy 5 and Policy 6 assumed that all traffic would access the site form Dorman Ave North. Journey planning from Policy 6 site set out the attached NPC Report Sections 5.3, 5.4 and 5.5, demonstrate this assumption is unsound.
8. However, the SA methodology (employed in both Local Plan (Reg 18) Sustainability Appraisal and Dover Rural Settlement Hierarchy 2020 SA) to demonstrate sustainable transport is limited to recording the proximity of new housing to a bus stop and / or train station. No analysis of commuting patterns, no baseline traffic data modelling, no modal split or journey to work data is considered. No 3rd party evidence on car dependency in Greenfield ex-urban developments nor car-dependency and the commuting pattern modelling in the Local Plan (Reg 18) Sustainability Appraisal 4.56 and 4.57 were not referenced in the report.

As a result the entire body of proportionate evidence that should have been considered in relation to DM Policy 29, 45 and NPPF paragraph 109 and paragraph 84 on the Elvington and Aylesham sites has either not been commissioned, not considered or simply ignored. It is therefore not possible to establish the soundness of Strategic Policy 5, 6 or 7. Our own journey planning traffic modelling suggests that they are not justified or effective. Nor are they consistent with NPPF paragraph 109 or paragraph 84.



Whether this is a deliberate policy by DDC is speculative, however, this lack of clarity on this point informs our other concern.

For DM Policy 29, NPPF paragraph 109 and paragraph 84 and DM Policy 45 these policy guidelines require the definition of ‘*unacceptable impact*’ or ‘*severe cumulative residual impacts*’. NPPF 2019 doesn’t provide a definition of ‘severe’ or ‘unacceptable’ and in the Highway Network & Highway Safety section of the LDP, DDC set out their ‘preferred policy options’ to have discretionary power over:

- When or whether Transport Assessments and Travel Plans are required.
- And to decide what ‘constitutes a severe residual cumulative impact on the local highway’ on a case by case basis.

While this operates within the framework of KCC guidance, we are mindful this provides DDC with an effective veto on the protection nominally afforded by DM Policy 29, NPPF paragraph 109 and paragraph 84 and DM Policy 45

In considering the potential impacts we are also mindful of:

- 1) The evidence that has not been included in the draft LDP itemised above.
- 2) The selectivity of the evidence used across the LDP and the resultant confirmation biases.
- 3) The pressure placed on DDC to deliver on Central Government housing targets.
- 4) The fiscal incentives of the New Homes Bonus (NHB) scheme.
- 5) Our experience on the Aylesham project including: the failure to ensure the Traffic EIA was undertaken in 2013, and the independence, scrutiny, timing, methodology and scheme occupancy levels on 2018 s106 on Planning Condition 73.

The LDP (Highway Network and Highway Safety) states:

- a. ‘It is the Council’s preferred option,’ in relation to TP’s and TA’s
- b. ‘the Council’s preferred policy option’ ‘severe’ and ‘unacceptable’ cumulative traffic impacts.

Preferred policy option means other policy options exist. We have requested clarification from DCC on the other policy options for a) and for b). We have also requested guidance on how this might impact the practical delivery of the planning process in Aylesham and Elvington. We look forward to receiving clarification in due course.

A FULL ANALYSIS OF THE DDTM AND THE HIGHWAY NETWORK AND HIGHWAY SAFETY ARE SETTING OUT IN SECTIONS 5, 6 & 7 OF THE ACCOMPANYING REPORT.

OVERARCHING IMPACT

By failing to provide housing in the coastal towns and villages (that will be primary recipients of the inbound migration that accounts for all the districts demographic growth over plan period), the LDP bakes in housing supply constraints, price rises and, ultimately, the deracination of the economically disadvantaged from



these communities. Because of DDC's 2010 deal to reduce affordable homes in Whitfield, the balance of affordable housing provision falls on Aylesham and Elvington, both former mining towns and amongst the districts poorest settlements.

With locals 'priced out' of Deal, Sandwich and Dover and the continued relocation of 'not always advantaged' London Borough residents into the cheaper accommodation in greenfield developments, this LDP risks delivering economic apartheid, with the gentrification the coastal towns and villages on one hand and the creation of islands of inland rural poverty similar to those seen in Cornwall where endemic poverty is located in ex-mining and deindustrialised towns. An LDP must be held accountable for tomorrow. We recognise the SA and LDP sated assumption that placing development in the most disadvantaged communities creates opportunities. It also carries risks. These risks do not appear to have been adequately weighted or sufficiently robust mitigation strategies proposed.

PROCESS CONCERNS

To quote Swale Cllr James Hunt (Con, The Meads) on their concurrent LDP public consultation "It is unrealistic to expect residents and parish councils to absorb such an enormous amount of information in such a short time". As previously registered, we believe Covid-19 and the refusal to extend the public consultation have exacerbated this. Given the scale and complexity of the LDP and the mismatch between the timeframe and tax payer- funded resources available to DDC when compared to those available to a Parish Council (especially a small village Parish Council like Nonington), we believe funding should be made available to enable Parish Councils to retain professional planning advice to provide effective scrutiny.



ADDITIONAL POLICY OR AREA-SPECIFIC COMMENTS

Our comments on the draft LDP are set out in attached report and appendices. For the purposes of the Reg 19 Consultation, all the evidence provided should be considered in the round.

1.0 Vision and Objectives

DDC's LDP's 'overarching vision' for Dover District in 2040 is built on encouraging inbound migration: 'Dover District in 2040 will be a destination of choice for people of all ages to make their home'. The 2018-based ONS local authority population projections note LA housing policy is an engine of inbound migration. Build and they will come. DDC's LDP policies are already fuelling demand.

It is unclear if DDC have a democratic mandate to pursue this policy. However, irrespective of mandate, the impact of migration should be considered under a range of realistic scenarios based on the latest projections and legitimate variations to ensure the housing allocation mitigates the potentially damaging impacts.

As Peter Brett's PAS White Paper on demographic modelling notes there should be 'joined up thinking between the population needed to provide for the existing and future population and the employment strategy and objectives being pursued'.

This LDP allocates insufficient housing where the inbound migration impact will be greatest while the SHMA (17) predicts that when the population increases, will lead to an increase in out-commuting, decrease in economic activity rates and an increase in unemployment. It is hard to see how this 'vision' will actually deliver sustainable economic, environmental or – ultimately social outcomes. Can this be called positively prepared?

Ref NPC Report Sections 2.5, 2.6, 2.7, 2.8 & 2.9

2.0 LHN Calculation

The requirement for **11,920** dwellings in Dover has been calculated to meet 'the area's objectively assessed needs' based on demographic changes using the standard method for assessing local housing need (LHN) using outdated ONS 2014-base population projections in order to deliver the Government's objective of 'significantly boosting the supply of homes'. The LHN figure is further distorted and skewed upwards by the changes to the 2019 NPPF parag 35a.

Population projections reflect the information inputs, assumptions and evidence used. Their reliability reduces with time SHMA 19 confirmed the 2016 data would lead to a 15% reduction in the



LHN. We have requested clarification from DDC on what the Dover LHN calculation would be using current 2018 base data.

Independent research by Cambridge University Public Policy Unit and London University on 2020 ONS employment data a drop in UK population of over 1 million.

The standard method is dictated by central government but NPPF 2019 requires an LDP to ensure *'Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements'* and to base their strategy on proportionate evidence.

Given the significant margin of error in a 2014 based LHN, this has implications for the robustness of a wide range of LDP assumptions from population growth, to migration to employment. This calls into question whether the evidence used is proportionate and, therefore, whether this plan will deliver effective outcomes.

Ref NPC Report Sections 2.1, 2.2, 2.3, 2.4 & Appendix1 Q9

3.0 DM Policy 4 Sustainable Travel

The LDP sets out the 'need to find more sustainable transport solutions, to cut the amount of private car use, traffic and resultant pollution... to tackle climate change, reduce carbon emissions and improve air quality'.

So how is this calculated?

There is a large body of academic evidence on sustainable transport systems and delivery. Public transport, cycling and walking uptake is highest in metropolitan and dense urban areas where use of public transport is typically 35%-50%. This falls dramatically in greenfield developments in ex-urban and rural sites. The generic green town planning principles are a blunt instrument, with research showing significant sustainable transport adoption variations exist within settlement types driven by socio-economic and topographical factors.

So how does the LDP seek to promote Sustainable transport?

Local Plan (Reg 18) Sustainability Appraisal SA objective 4 is to promote sustainable transport. However, the sustainable transport assessment methodology in the SA to establish transport sustainability isn't robust.

The Ministry of Housing, Communities & Local Government 2020 LDP guidance stresses the importance of contextual data such as travel to work areas and that evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively.

However, the SA methodology (employed in both Local Plan (Reg 18) Sustainability Appraisal and Dover Rural Settlement Hierarchy 2020 SA) to demonstrate sustainable transport **is limited to recording the proximity of new housing to a bus stop and / or train station.**

There's no analysis of commuting patterns, no baseline traffic data modelling, no modal split or journey to work data is considered. No 3rd party evidence on car dependency in greenfield ex-urban developments nor car-dependency and the commuting pattern modelling in the Local Plan (Reg 18) Sustainability Appraisal 4.56 and 4.57 were not referenced in the report.

Viewed in isolation, we are unable to see how methodology is fit for purpose as deployed in Dover Rural Settlement Hierarchy 2020 SA as it doesn't produce the proportionate evidence necessary to establish transport sustainability. Most worryingly, even where good empirical evidence exists, (ATC data, SERTM data, Nomis data, DataShine etc.) it hasn't been considered with significant planning decisions made simply on the basis of proximity to a bus stop. The reclassification of Elvington in 12/20 is an example of this. Inserted below is the full list of factors considered in the SA transport appraisal methodology.

SA objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion.	4a Rail	<= 500m of a railway station	501-1,000m of a railway station	N/A	1,001-2,000m of a railway station	>2,000m of a railway station	Each criterion 4a to 4c and 2a to 2d is scored: • Significant positive +3 • Minor positive +1 • Minor negative -1 • Significant negative -3 Scores totalled, and then averaged (i.e. total score divided by 7). Overall significance is scored as follows: • Significant positive >= +2 • Minor positive >0 to <2 • Negligible 0 • Minor negative <0 to <-2 • Significant negative >= -2
	4b Bus	<= 300m of a bus stop	301-600m of a bus stop	N/A	601-1,000m of a bus stop	>1,000m of a bus stop	
	2a GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	
	2b Open space, sport, recreation facilities, open country and registered common land	<=300m from open space, sport, recreation facility, open country and registered common land	301-800m from open space, sport, recreation facility, open country and registered common land	N/A	801-1,200m from open space, sport and recreation facility OR Loss of <25% open space, sport, recreation facility, open country and registered common land	>1,200m from open space, sport and recreation facility OR Loss of >=25% open space, sport, recreation facility, open country and registered common land	
	2c Public Rights of Way (ProW) / Cycle Paths	<=200m from ProW / Cycle Paths	201-400m from ProW / Cycle Paths	N/A	401-800m from ProW / Cycle Paths	>800m from ProW / Cycle Paths	
	2d Town Centres	<=400m from town centre	401-800m from town centre	N/A	801-1,201m from town centre	>1,200m from town centre	

So does this LDP meet its own sustainable transport objectives?

Local Plan (Reg 18) Sustainability Appraisal states *'The scale and distribution of growth dictated by the Local Plan will influence carbon emission generated by resident and worker's need to use private vehicles'*. SA objective 4 concludes the most effective way to do this 'deliver growth in closest proximity to the District's settlements' (with sustainable transport links and the greatest range of accessible local services and job opportunities) and to spread of growth amongst these accessible service centres to avoid 'significant amounts of road congestion'.



- a. With >70% of all LHN in 2 rural wards (Whitfield and Aylesham & Elvington and only 14% in Sandwich, Deal and Dover town) the LDP doesn't meet the SA's own Sustainable Transport objective 4.
- b. Travel to Work Census data for Whitfield, Elvington and Aylesham : 82.5% of all journeys were in private Cars. Only 5.8% on public transport.
- c. Compared to Dover, Deal and Sandwich, Aylesham and Elvington have poor local service provision and low job opportunities.
- d. Greenfield developments are associated car reliance, urban sprawl and highways impacts.

The Local plan fails to meet its own sustainable transport objective. More robust transport data has been ignored. Reviewed in line with a full traffic management appraisal, the SA 'sustainable travel methodology' is a useful tool but, in isolation, it doesn't provide a sufficiently robust and proportionate data set to provide a holistic overview of the impact of development on the highways and road network.

The WSP DDTM covered Dover, Deal and Whitfield. The report offered no conclusions on the area north of the A256 as it was outside the DDTM area. WSP explicitly recognise the porosity between traffic from B2046 and the local roads yet no data-based analysis of rural road capacity or cumulative traffic impact have been provided. Neither the Aylesham s106 ATC data nor the SERTM mobile GPS data have been considered in modelling Aylesham's or Elvington's traffic impacts.

The concentration of 67% of growth in 3 out of town greenfield developments is likely to cause 'significant amounts of road congestion'. Combined with the failure to commission or consider proportionate evidence, it is impossible to make a meaningful assessment of the DM Policy 4 in relations to the area north of the A256, NE of the A2. In the absence of this evidence, it must be considered unfound and unjustified.

Ref NPC Report Sections 6.0, 5.1-5.6 & Appendix1 Q7

4.0 Strategic Policy 1 Planning for Climate Change

This LDP places climate change and carbon neutrality front and centre of its policy commitments, stating this *'Local Plan supports and helps to deliver the Council's approach to the climate change emergency through a series of policies which aim to ensure that development proposals, which come forward between now and 2040, mitigate against and adapt to the effects of climate change'*.

Yet over 67% all extant and proposed housing projected over the LDP period is on new build out of town (see section 4.2 on Whitfield) Greenfield sites. The environmental impact of Greenfield developments are well documented.



Greenfield sites build at low housing densities and are a wasteful use of land; new roads, schools, health care, electricity, water, sewage and other carbon heavy services undermine the Council's zero carbon action plan. The evidence shows that even those developments near public transport have high car dependency.

We have been unable to reconcile how the housing type and distribution in the draft LDP aligns with the LDP's overarching commitments on climate change and carbon neutrality.

We have requested clarification on the methodology used (referencing the information inputs, assumptions and evidence used) for calculating whole lifecycle carbon footprint for Greenfield sites (/m3) and brownfield sites. We have requested performance based evidence on delivered units at Whitfield and Aylesham to support sustainability claims. In the absence of answers it is perhaps worth restating DDC's 2020 Local Plan (Reg 18) Sustainability Appraisal states that to be sustainable *'housing development should, where possible, be concentrated in the three urban centres of the district, Dover, Deal and Sandwich'. and should 'maximise the development of brownfield land.'*

The Local Plan (Reg 18) Sustainability Appraisal SA 7 objective is to mitigate and adapt to the effects of climate change. The SA concludes the options that perform best against SA objective 7 are those that focus growth around Dover where there is greater opportunity to maximise the potential of brownfield land and avoid the development of significant areas of greenfield land.

>70% of all LDP housing is on greenfield sites. The LDP split between Greenfield v's Brownfield across the district and in Dover, Sandwich and Deal is unknown. Clarification on has been requested from DDC. In the absence of further information it is assumed to be <15% of total.

On this basis, the current LDP fails to meet this benchmark. In terms of delivering sustainable climate change and carbon neutrality in Dover this policy is unfound being neither justified nor effective.

Ref NPC Report Sections 8.0, 6.0, Appendix1 Q7

5.0 Strategic Policy 2: Housing Growth

DDC's 2020 Local Plan (Reg 18) Sustainability Appraisal states 'The continued national policy emphasis on sustainable development means that *'housing development should, where possible, be concentrated in the three urban centres of the district, Dover, Deal and Sandwich'. and should 'maximise the development of brownfield land.'*

To be 'sustainable', the chosen 'hybrid' housing allocation requires the district settlement hierarchy to be altered by DDC (Elvington 12/20) and for a geographically separated greenfield new town development in Whitfield to be presented as 'Dover' using an administrative unit 'for planning purposes' and for the cumulative and synergistic effects of traffic levels, modal split and highways environmental impact to be excluded from the assessment.

So where does this place the houses?

- 67% of all 11,920 new proposed dwellings are located in 3 environmentally damaging Greenfield sites in just 2 of the District's wards:
 - 2 of these sites were housing growth centres in the previous plan. In the case of Aylesham, this has already added to traffic on the adjacent rural roads.
 - All 3 sites have very low public transport use (5.8%) and a greater than 80% reliance on private car use according to the ONS Travel to Work Census data.
- The LDP dwelling allocation ignores the existing settlement distribution patterns, failing to provide new housing for local people in their existing towns and villages.
 - Based on LDP assumptions, 8,435 new dwellings will be added to just 2 wards that had a combined population of 15,000 in 2011 (ONS Census).
 - Using current DD occupational density (2.35 / household) and LDP dwelling numbers, over 19,400 new people will be relocated into these 2 rural wards, **increasing the population from 15,000 to 35,000.**
- With less than 8% of Dover's population in 2011, Aylesham and Elvington have been allocated 18.5% of the proposed housing in the LDP. Deal with **26%** of the districts, population gets only **2.6%** of new houses, Sandwich gets **2.7%** and Dover **9%**. **67%** of all new LDP housing is on 3 new 'greenfield' development in Whitfield, Aylesham and Elvington.

The LDP provides housing numbers. But not where they are needed.

- The Office for National Statistics (ONS) shows 100% of the predicted population growth in Dover over the next decade is generated by people moving into the District (net inbound migration).
- Garrington's 2021 best the areas to buy a house show 3 Dover District Towns in Kent's top 50 with **Dover** 26th, **Sandwich** 12th and **Deal** the 9th best spot in Kent to buy. As people move into these towns and villages, this increases pressure on the supply of houses, pushing up prices. The less supply, the higher the price, the more likely it is that locals will be priced out of their towns and villages.
- The failure to provide housing in the right place will lead to the gentrification the coastal towns and villages on one hand and the creation of islands of inland rural poverty.



- DM Policy 12 (Affordable Housing does not require the delivery of affordable homes in Whitfield. This will increase the negative impact on Aylesham and Elvington.

The dwelling distribution set out in the LDP fails to meet the objectively assessed housing needs in Dover. It fails to plan for the impacts of migration. It is likely to cause residents to be priced out of their communities. It is neither justified nor effective.

Ref NPC Report Sections 3.0-3.0 - 4.0 – 4.3

6.0 Strategic Policy 4 Whitfield Urban Expansion

For 'planning purpose' this LDP treats Whitfield as Dover. However, from an SA / EIA perspective there is evidence to suggest this is misleading. A spatially distinct settlement 6.4 km and an hour's walk from Dover's train station and shops, Whitfield is socio geographically a separate new town development on a greenfield site with separate out town shopping.

- The Whitfield Master Plan states: 'the Dover Transport Strategy recognises 'the severance of Whitfield by the A2 and its walk time from town centre and local topography'.
- The 2020 Plan Sustainability Appraisal stated (4.50): 'The allocated Whitfield Urban Extension is of a scale large enough to be described as a new settlement.'
- The Whitfield 2010 Sustainability Appraisal recognised the risk of increased car dependency and stated: '*There will be a need to closely monitor delivery of proposals, as it will be critical that a culture of reduced car-dependency is enshrined from the outset*'.
- The 2020 Plan Sustainability Appraisal stated (6.4): Housing growth is concentrated in' Dover and neighbouring Whitfield.'
- The non-strategic sites in the LDP are divided into Whitfield (WHI __) and Dover (DOV __ __)

It is notable that the entire sustainability case for the LDP rests on the definition of the Dover Urban Area. We understand the legality of the position and acknowledge that a plan whose sustainability credentials relies entirely on administrative boundary offers lessons for Elvington's settlement hierarchy change. It also raises the question, of whether such a plan can be said to be positively prepared in terms of an NPPF 8c environmental objective.

Ref NPC Report Sections - 4.

7.0 Strategic Policy 5 North Aylesham Strategic Policy 6 South Aylesham

TRAFFIC IMPACTS

Aylesham is the 2nd largest growth hub in the LDP. Including extant, a further 1700 dwellings are proposed in the plan period. Despite projecting 'large increases in (traffic) flow', for Aylesham, the traffic data in the area north of the A256 was modelled in '**significantly less detail**' by WSP. In terms of the 2 strategic sites the entire traffic assessment is based on ATC data from just one road, the B2046, and some manual counts in Elvington.

WSP's report offered no conclusions on the area north of the A256 as it was outside the DDTM area. WSP explicitly recognise the porosity between traffic from B2046 and the local roads yet no data-based analysis of rural road capacity or cumulative traffic impact have been provided. Neither the Aylesham s106 ATC data nor the SERTM mobile GPS data have been considered in modelling Aylesham's or Elvington's traffic impacts.

It's modelling of traffic for Policy 5 and Policy 6 assumed that all traffic would access the site form Dorman Ave North. Journey planning from Policy 6 site set out the attached NPC Report Sections 5.3, 5.4 and 5.5, demonstrate this assumption is unsound.

As highlighted in Dover District Council Draft Dover District Local Plan (Reg 18) Sustainability Appraisal sections 4.56 and 4.57, the districts in / out commuting patterns data drive traffic to Dover or Sandwich or externally to Canterbury, Folkestone, Ashford and Thanet. This information has not been considered in strategic site selection in Aylesham.

The LDP proposes 8,435 new dwellings in 2 contiguous wards (Whitfield + Elvington & Eythorne) These wards had a combined population of 15,000 in 2011 (ONS Census). Using current DD occupational density (2.35 / household) and LDP dwelling numbers, over 19,400 new people will be relocated into these 2 rural wards, **increasing the population from 15,000 to 35,000.**

Yet no detailed Traffic Management survey has been conducted despite the **Sustainability Appraisal of Growth Options set out in the Dover District Council Local Plan Topic Paper: Overarching Strategy (Part 1) point 1.5.** Specifically to assess growth options in terms *its likely effects on environmental...using available evidence and considering factors such as: Commuting patterns, Transport infrastructure, traffic congestion (and related air quality and carbon emissions issues).*



TRAFFIC CONCLUSION

The LDP doesn't reference the 'proportionate evidence base' for the highways impacts in relation to the proposed expansion of Aylesham on the surrounding road network in accordance with DM Policy 29, NPPF paragraph 109 and paragraph 84. It is therefore not possible to ascertain the viability and deliverability of these strategic sites. This fails to meet **2019 NPPF guidance in particular 84, 102d and 108c but also 8c, 104b and 110c**

EMPLOYMENT

To be sustainable, the LDP is required to demonstrate how any large development will provide sufficient localised employment opportunities in accordance with NPPF 72 (b) obligation (also see NPPF parags 8 ,81 and 82) to ensure that sufficient access to employment opportunities are provided within the development itself.

The LDP's 2nd largest growth hub, DDC's SA states (^{4.7 SA 3}), *'Dover, Sandwich and Aylesham contain the highest number of employment sites.'* Rather than looking individually at the 2 settlements, they are being aggregated and Sandwich's employment (mainly at Discovery Park) is being used to justify the 'sustainable' employment case for 1700 dwellings in Aylesham. 10 miles and an economic universe apart, this aggregation is deceptive.

The Strategic Housing Market Assessment (2017) labour predictions and Local Plan (Reg 18) Sustainability Appraisal commuting patterns means that - unless on site employment is provided in accordance with NPPF 72b -then the additional residents of Aylesham and Elvington will have to commute to work. The SA work journey data suggests this will be either internally to Dover or Sandwich or externally to Canterbury, Folkestone, Ashford and Thanet. This has a significant carbon foot print and will impact the highway network including non A/B roads.

Three employment sites were considered in the SA and DDTM.

1. In the DDTM the Snowdown Colliery site was presented as providing 500+ FTE (Full Time Employees). However, it is not a strategic site and the landowner confirms they have an existing tenant and this is not up for renewal or change. We assume the employment numbers associated with this site will not be used to make the onsite employment case for Strategic Policy 5 and 6.
2. Aylesham Industrial Estate Estimated development potential **0 sqm** uses, but not to be strategic allocation. No new jobs here.

Aylesham Development Area - Allocated B1/B2 uses 8,500m². An extant site, this is the only site capable of delivering any employment growth in Aylesham.



In the WSP (Traffic Consultant survey) it is listed as providing **484 jobs** of B1 and mixed B2. This equates to 17m2 / full time employee. For B1 light industrial the m2/ per full time employee (FTE) would give 180 FTE. A significant proportion of the quoted 484 jobs would need to be office (B1a) jobs. NOTE the b1 / b2 classification is replaced by Class E. Given the requirement for a LDP to be 'realistic about what can be achieved' and the absence of B1a jobs in Aylesham, it is unclear if the 484 jobs is effective and can be delivered.

Of the 15 site options within and around Aylesham and Sandwich, the SA identified AYL003 as one of the 4 least sustainable sites, due in part to the loss of significant prime grade agricultural land. To justify this loss and to be sustainable in employment terms, the LDP is required to demonstrate how any large development will provide sufficient localised employment opportunities. Including extant 1700 more dwellings are planned for Aylesham. Aylesham will have grown from 4000 people in 2011 to a projected 12,000 by the end of plan period.

Does 300-400 on site employment provide sufficient onsite employment provision to make the proposed Aylesham expansion 'sustainable' in line NPPF 72 (b) obligation (also see NPPF parags 8, 81 and 82)? If not it is neither justified nor effective.

Ref NPC Report Sections 5.0, (inc 5.3, 5.4 and 5.5,) 6.0 & 9.0

8.0 Strategic Policy 7: Eythorne and Elvington Local Centre

In December 20 Elvington's settlement hierarchy was reclassified. This facilitated its inclusion as a strategic site in the LDP. The LDP is required to demonstrate that development is placed in the most sustainable area and that sustainable transport provision is modelled at the earliest opportunity.

The methodology employed in Dover Rural Settlement Hierarchy 2020 SA to demonstrate sustainable transport is limited to establishing the proximity of new housing to a bus stop and / or train station. That is it. No analysis of commuting patterns, baseline traffic, modal split or journey to work data was considered. Neither was ONS Travel to Work Census data for Elvington shows 89% journeys are in private vehicles of while only 2.5% were by bus and 3 % by train. Evidence for Greenfield development car-dependency and the commuting pattern modelling in the Local Plan (Reg 18) Sustainability Appraisal 4.56 and 4.57 were not referenced in the report.

If the purpose of Dover Rural Settlement Hierarchy 2020 is make a decision based on impartial evidence on transport sustainability, then these omissions are hard to account for. We are mindful of Ministry of Housing, Communities & Local Government 2020 LDP guidance advice on the importance of contextual data such as travel to work areas and that evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively.



Further informed by **DM Policy 29**, SA Part1 1.5 and NPPF parag 84, 102 a) + d), we believe a full travel plan with traffic modelling of the impact on the rural road network should have been considered before proposing Elvington as a strategic site in the LDP. As much of this traffic comes through Easole Street Conservation area, **DM Policy 45** commitment *not to generate levels of traffic, parking or other environmental problems which would result in unacceptable harm to the character, appearance or significance of the Area* is also a consideration.

The claim to provide relatively good transport links is not supported by the evidence while the failure to consider proportionate traffic evidence means the inclusion of Elvington as a strategic site is not justified in the absence of proportionate evidence.

Ref NPC Report Sections 3.0-3.0 - 4.0 – 4.3

9.0 Strategic Policy 14: Strategic Highway Infrastructure

February 2021 Cllr Trevor Bartlett, the Leader of Dover District Council said:

“for the Inland Border Facility to work, it must come with new investment in our already over-stretched local and strategic road network.”

November 2020 Lois Jarrett – Head of Planning

‘Government will be aware of the pressures that are suffered on (M2/A2) each route...which have impacted on the efficient operation of the network to the detriment of the East Kent and Dover area. Without significant improvements to these routes the ability to serve existing planned development and housing growth is compromised...indicates that viability challenges will inhibit growth in the absence of targeted investments to improve capacity’.

The stated recognition that the Dover districts rural highways network is under stress has not translated into an overarching evidence-based approach to the cumulative impact of developments on the rural road network. The impact on villages and rural communities hasn’t been adequately assessed.

The commitment to strategic highways improvements is welcome but inadequate. The dual carriaging of the A2 has been discussed and not delivered for 2 decades. To cope with severe cumulative impacts of successive plans and growing car numbers an ambitious evidenced-based approach should be a pre-cursor to further development.



10 DM Policy 29: The Highway Network and Highway Safety

COMMENTS INSERTED IN NONINGTON TRAFFIC IMPACTS AND A FULL ANALYSIS OF THE DDTM AND THE HIGHWAY NETWORK AND HIGHWAY SAFETY ARE ALREADY SET OUT IN SECTIONS 5, 6 & 7 OF THE ACCOMPANYING REPORT.

11 DM Policy 45: Conservation Areas

COMMENTS INSERTED IN NONINGTON TRAFFIC IMPACTS

12 Appendix 1 Settlement Hierarchy

COMMENTS INSERTED IN RELATION TO 1) NONINGTON TRAFFIC IMPACTS, 2) STRATEGIC POLICY 4 AND 7.



DDC LOCAL DEVELOPMENT PLAN PUBLIC CONSULTATION REPORT



Fredville Park Nonington 2020

prepared for
Nonington Parish Council
February 2021

Summary

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Appendix B

Reference Sources

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DDC RFI Questions



KEY FACTS



100%

of all population growth
in Dover till 2030 from
inbound migration.

{1}

71%

of Dover's LDP houses in
Aylesham, Elvington &
Whitfield - Population rises
15,000 -35,000

{2}

0%

Empirical evidence on
Dover's minor rural roads
north of A256 considered in
the LDP

{3}

25%

the LDP's population growth
projection is 25% higher than
the ONS (Office for National Statistics)
inflating requirements.

{4}

71%

of all development on
environmentally harmful
greenfield sites, concreting
over the countryside.

{5}

DDC

Estimated Net Revenue Gain

£25,000,000

Aylesham Development

2013-2020

{6}

{1} Source:Office of National Statistics (ONS) Regional Growth Estimates 2018

{2} DDC LDP - Strategic & Non Strategic Dwelling Allocation 2020 sorted by Ward

{3} LDP Evidence - WSP Dover Transport Model Local Plan Forecasting Report 2021

{4} Strategic Housing Market Assessment – Part 1 & 2 (2016 & 2019) - Peter Brett Associates

{5} DDC LDP Strategic + Non Strategic Housing Allocation 2020

{6} Dover Whole Plan Viability Study Nov-20 HDHP&D Ltd + New Homes Bonus Allocations 2019-20
Ministry of Housing, Communities & Local Government

DDC LOCAL DEVELOPMENT PLAN ROAD MAP

Central government housing targets force Local Authorities to accept developments where 'quotas' are not met, bypassing the wishes of communities expressed in local plans.

DDC commission Peter Brett Associates to calculate housing number requirements based on 2016 data using 'Standard Method' calculation based on a formula imposed by central government.

- 1) LDP public consultation delayed as a result of Covid-19.
- 2) HELAA consultation completed and site evidence presented.
- 3) WSP DDTM Traffic Modelling Report submitted.
- 4) DDC change Elvington status from village to allow development.
- 3) Draft LDP published December 2020.

Government publish a White Paper setting out the most radical overhaul to the planning system since WW2. Called a developer's charter, this minimises local input and control. A backbench revolt by a large number of Tory MPs including Theresa May is ongoing.

January - 18th March 2021 - DDC hold an online Local Plan public consultation during a national lockdown. No letter is sent out to parishioners. Awareness is low in Nonington.



2015

Mayor Johnson identified Canterbury, Dover and Thanet as locations to take 115,000 extra homes for London's overspill population. (<https://www.kentonline.co.uk/canterbury/news/kent-could-bear-the-brunt-33026/>)

Construction on Aylesham Garden Village 1200 home development gets underway in earnest.

2016

2017

2018

2019

National Planning Framework Guidance 2019 removes the requirement to place houses where they are needed in a local area and compels local authorities to allocate additional housing for 'overspill' from other districts.

Peter Brett Associates revised housing numbers in line with new government directives from 560 dwellings / year to 596 - 630 dwellings / year.

2020

2021

Nonington Parish Council have commissioned an LDP review and are looking to work with other Parish Councils, stakeholders and the media.

Our goal is to ensure that LDP housing allocation is based on balanced and unbiased evidence, a robust public debate and considers the true impact on the minor rural road network.

2021



1.0 EXECUTIVE SUMMARY

1.1 Background

Dover District Council are conducting a public consultation on their Local Development Plan (LDP). The LDP lists 11,920 new dwellings planned for sites across the district.

Once a site is included in a Local Development Plan, there is a 'presumption in favour of development'. This presumption will be reinforced if the proposed changes to the planning system set out in the Government White Paper are adopted.

Because of its location, Nonington is at high risk of severe traffic impacts **from 2,500 proposed new houses** that look to increase traffic levels through the village by **an estimated 35%-40%**.

National planning guidance state that developments that generate 'severe cumulative residual impacts in terms of capacity and road safety' should be refused. However, DDC want the definition of 'cumulative severe impact' to be decided by them on a cases by case basis. This provides DDC with an effective veto on all traffic objections. It is **crucial that everyone in Nonington takes this threat seriously**. If we want to protect our village, **we must act now**.

1.2 Report Objective

The LDP proposals will have a huge impact on the future of our village. Nonington Parish Council commissioned this report to review the evidence and assumptions underpinning the draft LDP in order to identify the risks to Nonington. We are a small village Parish Council, with limited resources and staffed by unpaid volunteers. DDC has a full time team of professional planners and expert consultants. If we want to influence DDC's plans, **we must all object to this draft plan**.

1.3 Methodology

The LDP contains several thousand pages of well-presented reports, policies and supporting information. However, there is a high level of assumption interdependency across the plan documentation. This what DDC's Traffic Consultant, WSP, call the '**uncertainty log information**' when describing the housing and employment numbers DDC provided them with. The independent Whole Plan Viability Study conducted by HDH Planning Development Ltd makes a range of assumptions including about infrastructure cost, developer contributions and delivery.

In the preparation of this report, we have also made assumptions. For example, when comparing Office for National Statistics and Local Development Plan 10 year population estimates for 2018-28 and 2020-30 respectively. This study is focused on highways and infrastructure but also considers elements of the broader plan.

DISCLAIMER This report has been created at speed by the Parish Council in response to the LDP. We have made every effort to reflect the findings in an accurate and balanced way. This report is designed for internal use. We are not professional planners and accept no liability for any errors in this report.

1.4 Findings Summary

Listed below is a summary of key findings. The evidence underpinning these findings is detailed in the main body of this report.

1.4.1 HOUSING NUMBERS & DISTRIBUTION

- 11,920 new dwellings are proposed by DDC to meet the housing needs of the growing population in the Dover District.
- The Office for National Statistics (ONS) shows 100% of the predicted population growth in Dover over the next decade is generated by people moving into the District (net inbound migration). New housing meets this demand rather than meeting the housing needs of the existing local population.
- 71% of all 11,920 new proposed dwellings are located in 3 environmentally damaging Greenfield sites in just 2 of the District's wards:
 - 2 of these sites were housing growth centres in the previous plan. In the case of Aylesham, this has already added to traffic through the village.
 - All 3 sites have very low public transport use (5.8%) and a greater than 80% reliance on private car use according to the ONS Travel to Work Census data.



LDP DWELLING ALLOCATION BY WARD 2021

- DDC's 2020 Local Plan (Reg 18) Sustainability Appraisal states 'The continued national policy emphasis on sustainable development means that *'housing development should, where possible, be concentrated in the three urban centres of the district, Dover, Deal and Sandwich'*. and should *'maximise the development of brownfield land.'* However, the population, LDP allocation and the Greenfield v's brownfield ratio have not been set out by settlement.

- DDC housing distribution is based on a hybrid of 3 of the 5 options reviewed in the sustainability assessment. To be 'sustainable', this 'hybrid' requires the district settlement hierarchy to be altered by DDC in Elvington and for a geographically separated greenfield new town development in Whitfield to be presented as 'Dover' using an administrative unit 'for planning purposes' and for the cumulative and synergistic effects of traffic levels, modal split and highways environmental impact to be excluded from the assessment.
- In December 2020 DDC **reclassified Elvington and Eythorne from 'village' to 'growth centre'** to allow 350 new houses to be added to the LDP. Sustainable transport is a precondition for development but no analysis of commuting patterns, baseline traffic, modal split or journey to work data appear to have been considered, despite ONS Travel to Work Census data for Elvington showing 89% of journeys were made in cars, vans and motorbikes while only 2.7% were by bus.
- The LDP dwelling allocation ignores the existing settlement distribution patterns, failing to provide new housing for local people in their existing towns and villages.
 - Based on LDP assumptions, 8,435 new dwellings (71% of total) will be added to just 2 wards that had a combined population of 15,000 in 2011 (ONS Census).
 - Using current DD occupational density (2.35 / household) and LDP dwelling numbers, over 19,400 new people will be relocated into these 2 rural wards, **increasing the population from 15,000 to 35,000.**
- With less than 8% of Dover's population in 2011, Aylesham and Elvington have been allocated 18.5% of the proposed housing in the LDP. In contrast, Deal has a population of 30,000 (around 26% of the district total) but is allocated only 2.65% of new housing.

1.4.2 TRAFFIC PLANNING

- DDC retained traffic consultants, WSP, to undertake a traffic modelling exercise to test the impact of LDP housing on the transport network. This detailed study only covered Dover and Deal. Other areas in the district were modelled in 'significantly less detail'.
- This less detailed study recognised that, as Aylesham is the 2nd largest development site in Dover's LDP, it will see '**large increases in (traffic) flow**', however, the actual data analysed was limited to ATC (automatic traffic count data) from just one road, the B2046.
- WSP's traffic impact analysis was also based on assumptions that don't survive scrutiny. E.g. all traffic to 650 new houses south of Spinney Lane will be accessed 'from B2046 via Dorman Avenue North'. The Elvington traffic evidence is even less robust. This is examined in more detail in the full report.
- North of the A256, the traffic modelling didn't include any data-based analysis of rural road capacity or cumulative traffic impacts. Neither the Aylesham s106 ATC data nor the SERTM mobile GPS data were considered in modelling Aylesham's and Elvington's traffic impacts.

- Dover District Council Draft Dover District Local Plan (Reg 18) Sustainability Appraisal detailed the District's net out-commuting patterns, particularly in the north and west, to Canterbury, Folkestone, Ashford and Thanet. Dover and Sandwich have the highest level of inward commuting. This crucial data has not informed the SA methodology or the LDP site allocation.
- Based on this review and given the scale of development and likely impact on highways capacity and safety, it is our view that the proposed Elvington and Aylesham developments fail to meet a number of 2019 National Planning Policy Framework requirements.

1.4.3 HIGHWAY NETWORK AND HIGHWAY SAFETY

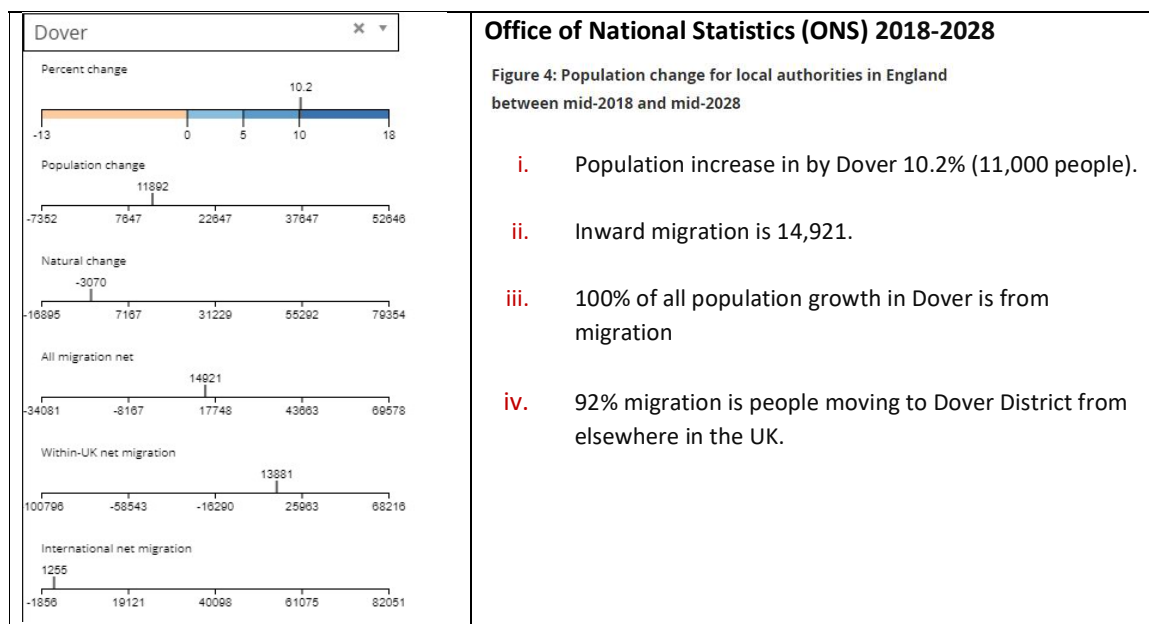
- The LDP commits to 'upgrading local road infrastructure' and, in accordance with NPPF guidelines, undertakes to refuse developments that generate 'severe cumulative residual impacts in terms of capacity and road safety'. However, NPPF 2019 doesn't provide a definition of 'severe' or 'unacceptable'.
- **DM Policy 29:** The Highway Network and Highway Safety states '*Traffic generated by development should normally be targeted towards the primary and secondary route network in the District. Other routes should not be subject to inappropriate levels of traffic generation*'. That sounds pretty comprehensive but without sufficient baseline traffic data for this area and DDC able to stipulate what 'constitutes a severe residual cumulative impact' on the local highway, DDC have an effective veto on traffic issues can presented as material considerations on a scheme.

Based on the selective use of evidence in the LDP and on the documented process failures on the 2013-18 Aylesham project, we believe this issue to be the pivotal risk factor for Nonington.

1.4.4 POPULATION RELOCATING TO DOVER

- As 100% of the 10 year predicted population growth in Dover is generated by people moving into the district, we believe the cumulative impact of migration on housing delivery needs to be linked to housing distribution to prevent poor LDP outcomes. **Housing needs to be in the right place.**
- Garrington's 2021 best the areas to buy a house show 3 Dover District Towns in Kent's top 50 with **Dover** 26th, **Sandwich** 12th and **Deal** the 9th best spot in Kent to buy. As people move into these towns and villages, this increases pressure on the supply of houses, pushing up prices. The less supply, the higher the price, the more likely it is that locals will be priced out of their towns and villages. Does this LDP provide housing where it is needed? No. Deal with **26%** of the districts, population gets only **2.6%** of new houses, Sandwich gets **2.7%** and Dover **9%**. **71%** of all new LDP housing is on 3 new 'greenfield' development in Whitfield, Aylesham and Elvington.
- London Borough social housing relocation is focused on the 'affordable housing' units provided on the larger 'strategic' development sites like those in Aylesham and Elvington. In 2010 DDC did a deal to reduce the affordable allocation in Whitfield.

This could result in islands of rural poverty in former mining towns - a pattern seen in Cornwall's where in expensive coastal locations are juxtaposed against high levels of deprivation and poverty concentrated in deindustrialised inland towns.



1.4.5 EMPLOYMENT AYLESHAM

- To be sustainable, the LDP is required to demonstrate how any large development will provide sufficient localised employment opportunities.

Aylesham is the LDP's 2nd largest growth hub. The LDP's economic case for Aylesham's expansion rests on the promise of over 1000 new jobs. There's no historic data on DDC's delivery on their employment targets for Aylesham's expansion 2014-2021. A hairdresser, a pet shop, East Kent Recycling?

- DDC's SA states (4.7 SA 3), 'Dover, Sandwich and Aylesham contain the highest number of employment sites.' Rather than looking individually at the 2 settlements, they are being aggregated and Sandwich's employment (mainly at Discovery Park) is being used to justify the 'sustainable' employment case for 1700 dwellings in Aylesham.
- WSP's report models 529 jobs at the Snowdown Colliery site. The Dover Economic Growth Strategy (2021) predicts 470. The Snowdown Colliery site the landowner confirms they have an existing tenant and this is not up for renewal or change. There no information on the business case or backers. No planning application has been made. Given the requirement for a LDP to be 'realistic about what can be achieved' and 'the need to work with landowners at an early stage in the plan-making process', the employment numbers assigned to the Snowdown Colliery don't appear deliverable.



- We have been unable to establish if the 400 odd potential jobs on the 8,500 sq ft of deliverable space is sufficient to meet NPPF's requirement for providing employment on site in a strategic site. This requires data on the amount of economically active residents presently and predicted in the growth.

1.4.6 PLANNING REVENUE INTERESTS

- A Local Authority receives revenue for every new house built through the government's New Home Bonus scheme. For 2019-20, DDC received £1.7 million.
- Where the Local Authority is also the landowner, (as in Aylesham 2013 and in Elvington in 2021), they benefit from the additional 'planning gain', the increases land value that comes with planning permission. DDC's LDP benchmark price is £400,000/hectare on strategic development sites.
- Local Authorities also receive money from developers for infrastructure and impact mitigation measures. This is typically tied to specific planning conditions and is called the Section 106 – or s106 – funding.

1.4.7 CLIMATE CHANGE

- This LDP places climate change and carbon neutrality front and centre of its policy commitments, stating this *'Local Plan supports and helps to deliver the Council's approach to the climate change emergency through a series of policies which aim to ensure that development proposals, which come forward between now and 2040, mitigate against and adapt to the effects of climate change'*.
- **Over 70% all extant and proposed housing projected over the LDP period is on new build out of town (see 6.2 below) Greenfield sites.** The environmental impact of Greenfield developments are well documented. Greenfield sites build at low housing densities and are a wasteful use of land; new roads, schools, health care, electricity, water, sewage and other carbon heavy services undermine the Council's zero carbon action plan. The evidence shows that even those developments near public transport have high car dependency.

We have been unable to reconcile how the housing type and distribution in the draft LDP aligns with the LDP's overarching commitments on climate change and carbon neutrality and have requested clarification.

1.4.7 THE POLITICAL DIMENSION

It is true that central government forces housing quotas on local authorities and that people need housing. However, **people need the right housing in the right places.**

Listed below is some background information on the political backdrop. The key point is that in other areas in East Kent the Conservative MP's and Councillors are pushing back strongly against this. This is not the case in Dover.

- In 2015, Mayor Johnson identified Canterbury, Dover and Thanet as locations to take 115,000 extra homes for London's overspill population. [NEWS STORY LINK](#)

- Urban population relocation from London to Dover increases pressure on the district's housing, health and educational resources. This draft LDP fails to recognise or mitigate the impact of inbound migration from London. It fails to allocate housing where it is needed within existing communities. The resultant policy incoherence and inconsistencies mean the LDP risks delivering poor environmental, economic and social outcomes in the Dover district.
- In February 2021, Conservative MP Sir Roger Gale made an impassioned plea to “stop concreting over Kent”, fearing that Kent has become a “dumping ground for London”, with acres of valuable Kent farmland being lost to new housing built to house people from outside the area.
- Dover's MP, Natalie Elphicke, is the **Chief Executive Officer of the privately funded Housing and Finance Institute (HFI)**, co-founded by housing developers Laing O'Rourke and Keepmoat Homes etc. The HFI's aim is "to boost the capacity and delivery of housing". In 02/20, Elphicke was appointed as a Parliamentary Private Secretary at the Ministry of Housing, the department responsible for the controversial planning reform White Paper.

TheWorkForYou is an independent resource that takes open data from the UK Parliament on MP's voting records considered by issue. On environmental issues, it concludes that '**Natalie Elphicke consistently voted against measures to prevent climate change**'. [LINK](#).

- Swale Conservatives write to Secretary of State Robert Jenrick to extend Local Plan consultation ([LINK](#))

Cllr Alan Horton (Hartlip, Newington and Upchurch), a former police chief and leader of Swale council's Conservative Group, said: “This is the biggest, most important consultation the council carries out. To rush it through in the way the coalition administration is doing is simply wrong. "People need the chance to fully understand what the plan means for them and their communities and have ample time to respond”.

Cllr James Hunt (Con, The Meads) said: "It is unrealistic to expect residents and parish councils to absorb such an enormous amount of information in such a short time, especially if the information is changing, incomplete or inaccurate. "Regardless of the many issues with the Plan, there has to be adequate time for consultation, and the council should extend the period." "The council needs to give those communities time to consider all aspects of what it is proposing.”

Conclusion

1. This LDP is not a plan designed to provide affordable housing for local people in the towns and villages where they now live. The LDP strategy appears driven primarily by Central Government housing targets, to be delivered whatever the social or environmental cost.
2. The lack of balanced housing provision means this plan (combined with migration) will restrict access to affordable houses for young people and couples who were born and brought up in Dover's towns and villages.
3. The continued placement of London Borough social housing overspill to 'strategic' Greenfield development will exacerbate existing regional inequalities and create pockets of rural deprivation.
4. Associated with high levels of car use, Greenfield sites result in "urban sprawl", traffic congestion and pollution as locals commute from urban areas. These developments are changing the character of the countryside. They are inflicting irreversible damage on wildlife.

Faced with the severe challenges of climate change, this is the worst possible environmental solution to the housing crisis.

5. The LDP provides no costed infrastructure plan. Traffic modelling for the north of the district is patchy and insufficient for the scale of the proposed development. No empirical data on rural roads has been considered. It is unclear whether this is a deliberate omission.
6. The lack of definition of 'severe' or 'unacceptable' traffic impact is fundamentally anti-democratic, providing no checks or balances, even where the planning authority is also the landowner. The national planning system ought to protect local communities. This disempowers them.
7. The LDP's population, employment, migration and work pattern assumptions don't consider the impact of either Covid-19 or Brexit. Research on ONS data by Cambridge University's Public Policy Group point to a UK wide population decrease of 1.9% mostly affecting London. London may no longer have the shortage of homes. Changing work patterns affect housing location requirements.
8. The Local Government Association states 'local government institutions should be genuinely independent centres of decision-making and policy autonomy, able to make meaningful choices on behalf of their citizens'. Driven by central government targets, this LDP does not meet that democratic charter.

Report Findings

2.0 Demographics & LHN Calculation

2.1 Dwelling Numbers

- The Local Development plan allocates **11,920 new dwelling** in the Dover District to be delivered between 2020 -2040. This is based on delivering 596 dwellings / year. The baked in option to increase to 630 units / year increases the total number of dwellings across plan period to **12,600 dwellings**.
- These shortlisted sites are divided into 'strategic' (large scale) housing developments and 'non-strategic' (smaller scale) housing developments more widely dispersed across the region.
- The **11,920** figure includes sites allocated in the last LDP but not developed in the plan period.
 - The Prima site is an example of this.
 - As are the 572 approved dwellings yet to be completed in Aylesham.
 - The new LDP proposes a further 1,250 additional homes increasing Aylesham's size by >225% from 2,000 houses in 2014 to 4,500 dwellings with a population of 10,500.

2.2 10 year Regional Population Growth (100% from net inbound Migration)

The requirement for **11,920** dwellings in Dover has been calculated to meet 'the area's objectively assessed needs' based on demographic changes. The LDP allocates 11920 dwellings in Dover's to meet local housing needs resulting from population growth and change 2020-2040 based on the standard method for assessing local housing need (LHN) using outdated ONS 2014-base population projections designed exclusively to deliver the Government's objective of 'significantly boosting the supply of homes.

Population projections underpin the objectively assessed need for housing. They are not forecasts and reflect the information inputs, assumptions and evidence used. Their reliability reduces with time. There are risk associated basing a plan on 2014 base data without considering the published 2016 or 2018 data or the impacts of the pandemic or Brexit.

According to the **Office of National Statistics (ONS) 2018-28** the local indigenous population – those of us who live here and pay council tax in Dover District - will decrease by 3000 as death exceeds birth rates. Although the 'local' population is shrinking, the ONS predicts a 10 year increase in population by 11,851 with population growth coming from the **inbound migration of 14,921 new people** into the area.

- According to the ONS, housing policy is instrumental in encouraging inbound migration. All additional housing demand contained the draft LDP is required exclusively to meet external demand created by inbound migration. This migration is facilitated and accelerated by DDCs policy choices.

- The loss of irreplaceable countryside, the increase in traffic, the pressure on schools and the impact on air pollution will, therefore, be the direct result of DDC's deliberate policy decisions as set out in this LDP.

2.3 Population Growth Assumptions

The LDP's population growth assumption is >20% higher than the ONS figures and higher than the population growth predictions on DDC's own website. Why?

In 02/19 the UK government stipulated use of 2014-based projections as the demographic baseline for the LHN standard method. The LHN figure is further distorted and skewed upwards by the changes to the 2019 NPPF parag 35a.

The average UK number of people per dwelling is 2.4. In Dover (District) the ratio is currently 2.35. Using the Dover metric and the lower 596 dwellings / year figure the plan is built on, we can calculate the LDP 10 year projected population growth:

- For 596 Dwellings / year the LDP assumes a + 14,006 population growth in 10 years
- For 630 Dwellings / year the LDP projected district population growth is +14,805
- The ONS predicts a 10 year increase in population by 11,851

The ONS figure already includes a figure for adjacent district migration to '**accommodate unmet need from neighbouring areas**' as required by new 2019 Central Government direction in the NPPF (national Planning Policy Framework).

In 2018, DDC stated '*Over the past 15 years, the population of the District has grown slower than the county and national averages, growing by 10.6% between 2003 and 2018. The population is forecast to increase by 10.7% between 2018 and 2038, which would increase the population size to 129,400*'.

<https://www.dover.gov.uk/Corporate-Information/Facts-and-Figures/Dover-District-Summary.aspx>

The LDP growth estimate is based on 'the Standard Method calculation set out in national planning guidance'. In making the Standard Method calculation, the 2016 and 2019 revised Strategic Housing Market Assessments analysis make a series of assumptions. This is a technical area, however, it is relevant to make the following general observation:

- I. Assumptions can be - and are - used to manipulate statistics to deliver the desired outcomes.
- II. The assumptions used should be reviewed in light of Covid-19 and Brexit

2.4 Obsolete Planning Assumptions

Covid and Brexit have had significant impacts on UK demographics and commuting patterns. No allowance for these changes has been made in the LDP rendering plan population modelling assumptions obsolete. Unmodified, these are likely to lead to poor social and environmental outcomes across Dover.

- Analysis of the latest ONS data suggest a **drop in UK population of 1.3 million**, the largest fall in the UK resident population since World War Two, with London most affected.
- PwC predict the first annual drop in London's population since 1988 and a drop in birth rates in 2021.
- DDC's LDP population growth estimates are based on 2016 data revised upwards in 2019 to facilitate the 'case' for higher dwelling number provision. (Strategic-Housing-Market-Assessment - Peter Brett Associates 2019).
- Office work will persist but with the likes of Lloyds, HSBC, JP Morgan, PWC, Google etc. all adopting hybrid office and WFH rotational models, this may have profound implications for London's overspill.

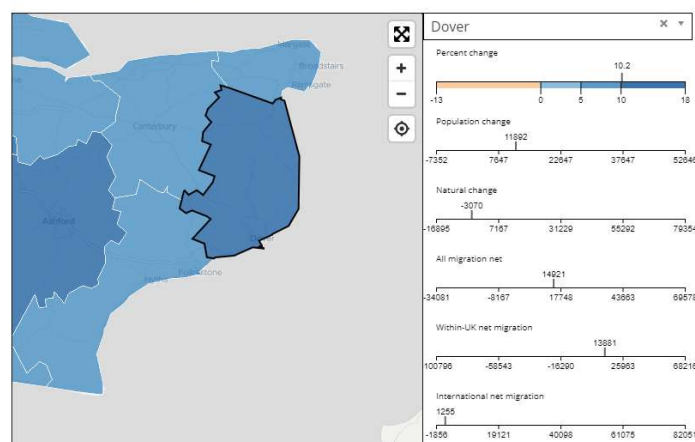
NPPF 2019 require an LDP to ensure '*Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements*'. A 2020 analysis of the latest ONS data published by Cambridge University's Public Policy Institute Cambridge University and 2021 King's College London research paper into the latest ONS UK employment data both estimate the biggest drop in UK population of over 1 million (the biggest since WW2) because of Brexit and Covid-19.

Do the demographic modelling assumptions in the LDP accommodate the projected impact of Brexit and Covid-19 on the UK and Dover demographics and migration?

2.5 Socio-demographic Impacts of Inbound Migration

The role of inbound migration on dwelling numbers is one of the undiscussed elephants in DDC's LDP room. **So, what are the numbers?**

Figure 4: Population change for local authorities in England between mid-2018 and mid-2028



Source ONS 2018

- i. The population is predicted to increase in by Dover 10.2% 2018-2028. This represents an increase in population of 11092.
- ii. Natural change (without inward migration) the population is expected to decrease of 3070 as deaths outstrip births.
- iii. All net inward migration is 14,921.
- iv. Only 1,254 of the 14,921 in international migration. 92% (13,666) of the net inbound migration is people moving to Dover District from elsewhere in the UK
- v. This is comprise of different subgroups
 - a. Migration form adjacent districts (Thanet, Canterbury, Folkestone)
 - b. Urban Professional Quality of Life migration (moving down to coast country)
 - c. Local Authority rehoming to take advantage of lower housing costs

For Dover option v) b & c are primarily from London. Sometimes called London overspill, the two groups have distinct socio-economic characteristics and differing impacts on Dover's Housing market.

2.6 Is migration a deliberate Policy Choice by DDC

The 2018-based ONS local authority population projections note housing policy is an engine of inbound migration. Build and they will come. DDC's LDP's 'overarching vision' for Dover District in 2040 is built on encouraging inbound migration: 'Dover District in 2040 will be a destination of choice for people of all ages to make their home'. DDC's LDP policies are already fuelling demand.

However, irrespective of cause, the impact of migration should be considered under a range of realistic scenarios based on the latest projections and legitimate variations to ensure the housing allocation mitigates the potentially damaging impacts. Does this LDP do this?

2.7 Migration Housing Supply & Price

Garrington's 2021 best the areas to buy a house show 3 Dover District Towns in Kent's top 50 with **Dover** 26th, **Sandwich** 12th and **Deal** the 9th best spot in Kent to buy. As people move into these towns and villages, this increases pressure on the supply of houses, pushing up prices. The less supply, the higher the price, the more likely it is that locals will be priced out of their towns and villages.

Does this LDP provide housing where it is needed?

No. Deal with **26%** of the districts, population gets only **2.6%** of new houses, Sandwich gets **2.7%** and Dover **9%**. **71%** of all new LDP housing is on 3 new 'greenfield' development in Whitfield, Aylesham and Elvington.

Quality of life migration (and 2nd home buyers) will tend to relocate to the districts 'idyllic villages to coastal towns'. Given the failure of the LDP to allocate sufficient new homes in Deal, Sandwich, Kingsdown, Wingham, Worth, St Margret's, this will inevitably cause the dislocation of existing residents priced out of their communities. This will disproportionately affect the poor and the young.

2.8 London Social Housing Overspill Impacts

Londoners are being moved to the county for social housing. Many of the London local authorities have moved significant numbers of families being to Kent. London Borough social housing relocation is focused on the affordable new housing units provided on the larger 'strategic' development sites like those in Aylesham and Elvington. In 2010 DDC did a deal to reduce the affordable allocation in Whitfield.

2.9 The likely impact of migration in Dover with current housing distribution

Urban population relocation from London to Dover increases pressure on the district's housing, health and educational resources. This draft LDP fails to recognise or mitigate the impact of inbound migration from London. It fails to allocate housing where it is needed within existing communities. The resultant policy incoherence and inconsistencies mean the LDP risks delivering poor environmental, economic and social outcomes in the Dover district.

- The relocation of 'not always advantaged' London Borough residents to the cheaper accommodation in Greenfield developments increases the pressure on education, health, social services and the housing waiting list. <https://www.kentonline.co.uk/kent/news/longest-waits-for-council-housing-revealed-233123/>
- This impact is compounded when the affordable units are in former mining towns (with high indices of deprivation, poor amenities and bad transport). [Deprivation Statistics for Aylesham, Eythorne & Shepherdswell, Dover \(ilivehere.co.uk\)](#)
- This policy risks creating island ghettos of rural poverty similar to those seen in Cornwall where endemic poverty is located inland, often in old mining communities while the locals are priced out of their coastal communities and replaced by holiday homes and retirees.
- In 80% of Cornish wards, 20% of the population is experiencing multiple deprivation and, in more than one fifth, over a third of the population is experiencing multiple deprivation. Within Cornwall multiple deprivation is again spatially concentrated within the districts of Kerrier and Penwith.
- **Source** <https://www.cornwall.gov.uk/media/40596801/imd-2019-cornwall.pdf>.

3.0 Housing Growth Distribution

DDC outlined 5 options for 'the distribution of housing growth'

- A. Distributing growth to the District's suitable and potentially suitable housing and employment site options (informed by the HELAA and ELR).
- B. Distributing growth proportionately amongst the District's existing settlements based on their population.
- C. Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy (informed by the Settlement Hierarchy Topic Paper).
- D. Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover.
- E. Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

The Sustainability Appraisal Overarching Strategy (Part1) identified 3 growth options for dwelling distribution. This was expanded to 5 spatial options in the draft LDP (above). DDC selected a hybrid of 3 of the 5 options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). To be 'sustainable', this 'hybrid' required the district settlement hierarchy to be altered by DDC in Elvington and for a geographically separated greenfield new town development in Whitfield to be presented as 'Dover' using an administrative unit 'for planning purposes' and for the cumulative and synergistic effects of traffic levels, modal split and highways environmental impact to be excluded from the assessment. It also requires some creative presentation of the

DDC's 2020 Local Plan (Reg 18) Sustainability Appraisal states 'The continued national policy emphasis on sustainable development means that *'housing development should, where possible, be concentrated in the three urban centres of the district, Dover, Deal and Sandwich'*. and should *'maximise the development of brownfield land.'*

The (Reg 18) Sustainability Appraisal SA objective 2 is 'To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, wellbeing, recreation and integration'.

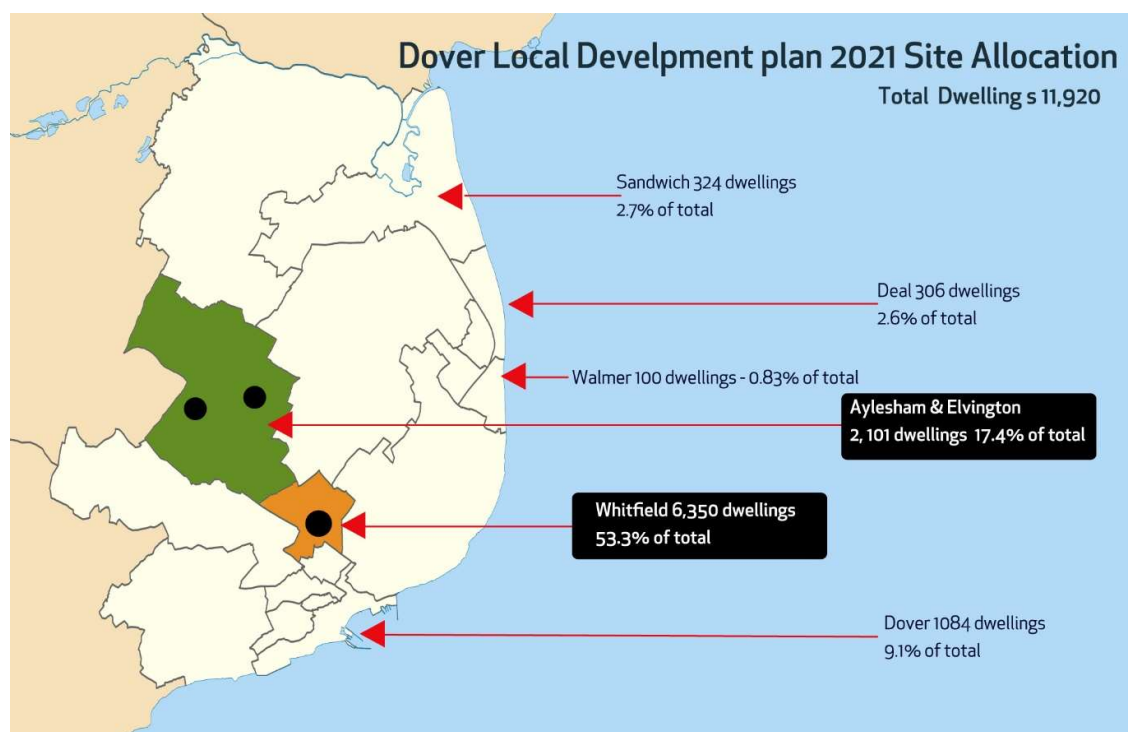
The options that perform best against SA objective 2 are those that deliver growth in closest proximity to the District's settlements with the greatest range of accessible local services and facilities... the less significant the scale and more even the spread of growth amongst these sustainable service centres the less likely growth will generate significant adverse effects on the health and well-being of local residents and workers.

So how does DDC's LDP meet its own benchmark?

With **over 71.7% of all 11,920 dwellings located in 3 Greenfield sites in 2 adjacent wards**, one might better characterise DDC's LDP overarching housing distribution policy as greenfield-centric, concentrating housing growth in isolated rural pockets with multiple indices of deprivation.

Mapping the LDP's dwelling distribution by Ward provides offers a more granular overview of allocation across the district.

Dover District LDP Housing Allocation by Ward.



KEY FACTS

1. In the 2011 census, 15,055 lived in these 2 wards. 12% of the districts population.
2. Only **14.4%** of all LDP housing is in **Dover** (9.1%), **Sandwich** (2.7%) and **Deal** (2.3%).
3. **67%** of all 11,920 new proposed dwellings are located in 3 environmentally damaging Greenfield sites in just 2 of the District's wards. 1725 in Aylesham, 5750 in Whitfield, 350 in Elvington (with 200 in Shepherdsweil and Nonington).
4. Deal contains 27% of the population but only 2.6% of the dwelling allocation.
5. Aylesham and Whitfield delivered significant growth in the previous plan period.



6. Elvington and Aylesham are purpose built mining settlements built in the 1930's.
7. Aylesham LSOA in the top 20% of most deprived wards in England.
8. Whilst Elvington & Aylesham score low to average across a range of indices of deprivation (education, training, income etc.) there is one index where they score highly. On outdoors environment Aylesham & Elvington score 1/10 'Excellent'. DDC have a cunning plan to fix this . Source [Deprivation Statistics for Aylesham, Eythorne & Shepherdswell, Dover \(ilivehere.co.uk\)](https://ilivehere.co.uk/deprivation-statistics-for-aylesham-eythorne-shepherdswell-dover).
9. The LDP split between Greenfield v's Brownfield across the district and in Dover, Sandwich and Deal is unknown. Clarification on has been requested from DDC. In the absence of further information it is assumed to be <15% of total.

With < 1/7th of all dwellings in the towns of Dover, Deal and Sandwich and >70% dwellings in greenfield sites, the dwelling distribution in the LDP doesn't align with the sustainability benchmark set out in its own SA. In the attempt to comply with of NPPF compliance, DDC have changed the district's settlement hierarchy on scant evidence, conflated Dover and Whitfield for environmental impacts and Aylesham and Sandwich for employment sites. They have failed to commission or consult detailed traffic data for large parts of the district and have proposed major employment sites to justify LDP strategic housing policies which the landowner informs us are undeliverable in plan period due to ongoing tenancy commitments. We, therefore, believe this LDP is ineffective, unjustified and – in many instances- at odds with national policy.

These evidence to support these claims is presented and analysed in the following sections of this document.

4.0 Settlement Hierarchy

The presentation of the distribution of housing growth in the District by settlement type is problematic. For example:

- Sandwich - a town of 5000 people and the highest house prices in the area - is allocated 324 dwellings in the LDP.
- Aylesham a former mining 'village' with some of the lowest house prices in the district and a population of 4000 gets 1,700 dwellings.

However, the LDP evidence combines them to form '*Sandwich; Aylesham (Rural Service Centres) with 19.83% of housing allocation*'. Similarly the LDP claims that Dover gets 47% of all housing. Take out Whitfield Greenfield development and this figure drops to 9%.

This conflation of separate settlements by settlement type is not just academic. It is being leveraged to 'prove' sustainability of the proposed LDP. For example, to make the employment case for the concentration of development in Aylesham, the 'independent' Sustainability Appraisal states (4.7 SA 3), '*The settlements of Dover and Sandwich experience the highest level of inward commuting in the District. Dover, Sandwich and Aylesham contain the highest number of employment sites.*'

Over 10 miles and an economic universe away from Aylesham, Sandwich's employment – mainly at Discovery Park - is being cynically leveraged to justify the employment case for 1700 dwellings in Aylesham (inc extant).

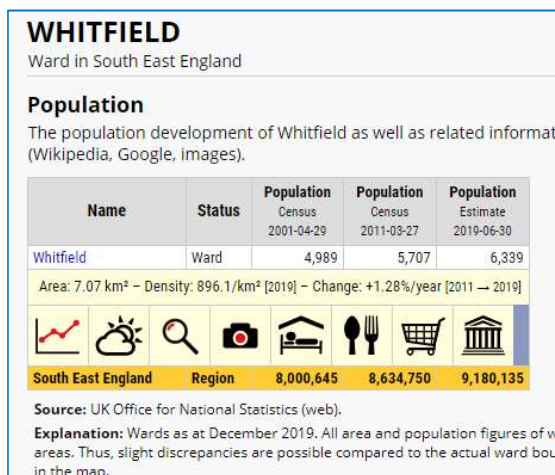
Listed below is a review of settlement hierarchy in Whitfield and in Elvington, reviewing how this can have a skew planning decisions.

4.2 Dover v's the Dover Urban Area

The draft **LDP claims the housing distribution is aligned to settlement hierarchy** as a high proportion of new dwellings are in Dover. In fact over 80% of dwellings classified as 'Dover's' housing are in Whitfield. The LDP's non-strategic site list breaks down sites into Dover (DOV__) and Whitfield (WHI__). However, on large scale (strategic) developments the LDP states '*For planning purposes, the Dover Area has to date included the parishes of Guston, Whitfield, River and Temple Ewell*'.

By reclassifying Whitfield as part of the Dover Urban Area, development becomes 'urban expansion' and many of the environmental and sustainable planning requirements are removed. It is unknown whether the 'Dover Urban Area' is a long established administrative unit or whether it is a planning-driven reclassification (like the current reclassification of Elvington) designed to circumvent the sustainability hurdles to Whitfield's development?

This is relevant to the transparency of the LDP dwelling allocation and for the insight it offers into DDC's planning modus operandi.



Whitfield is a spatially distinct settlement over an hour's walk from Dover's train station and shops. The Whitfield Master Plan states :

3.8 In terms of walking and cycling trips, the Dover Transport Strategy identifies severance of Whitfield by the A2 and its walk time from the town centre and local topography.

With a population of 5707 in the 2011 UK census data, Whitfield is an ancient village, civil parish and electoral ward, located on the top of the downs at the junction of the A2 and A256 roads, some four miles (6.4 km) north of Dover.

It has separate village amenities and direct access to out of town retail.

For the purpose of making the case for equity of dwelling distribution by settlement hierarchy, the LDP treats 'Dover' and the 'Dover Urban Area' as interchangeable. We believe this disguises the actual LDP dwelling distribution. To highlight LDP dwelling distribution, this report, therefore, considered development by electoral ward.

Dover District Council October 2010 Whitfield Urban Expansion Sustainability Appraisal states: *'The urban extension could give rise to a significant level of traffic generation if left unmanaged. Therefore it must be master planned...to limit unrestrained car use from the Whitfield development. Initially, there will be a need to closely monitor delivery of proposals, as it will be critical that a culture of reduced car-dependency is enshrined from the outset'*.

While recognising that for 'planning purpose' this LDP treats Whitfield as Dover, however, from an SA / EIA perspective there is evidence to suggest this is misleading. A spatially distinct settlement 6.4 km and an hour's walk from Dover's train station and shops, Whitfield is socio geographically a separate new town development on a greenfield site with separate out town shopping.

- The Whitfield Master Plan states: 'the Dover Transport Strategy recognises 'the severance of Whitfield by the A2 and its walk time from town centre and local topography'.
- The 2020 Plan Sustainability Appraisal stated (4.50): 'The allocated Whitfield Urban Extension is of a scale large enough to be described as a new settlement.'
- The Whitfield 2010 Sustainability Appraisal recognised the risk of increased car dependency and stated: *'There will be a need to closely monitor delivery of proposals, as it will be critical that a culture of reduced car-dependency is enshrined from the outset'*.
- The 2020 Plan Sustainability Appraisal stated (6.4): Housing growth is concentrated in 'Dover and neighbouring Whitfield.'
- The non-strategic sites in the LDP are divided into Whitfield (WHI __) and Dover (DOV __ __)

4.3 Urban Hierarchy - Elvington Reclassification

DDC 'restructured' the settlement hierarchy in December 2020, to reclassify Elvington as suitable for Greenfield development. DDC confirm this is informed by NPPF guidance that *'in the first instance, the principle of sustainable development, and which requires local planning authorities to ensure that, wherever possible, new development is located in the most sustainable locations'*.

- The evidence for sustainable transport delivery in out of town greenfield sites is reviewed in section 2.6 concluding greenfield developments are highly environmentally destructive, car use reliant and land hungry.
- This reclassification ignores large sections of NPPF 2019 guidance including paragraph 84 and 102 which states *'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:.a) the potential impacts of development on transport networks can be addressed; d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account'*
- By failing to provide a travel plan and by side lining evidence from the ONS 2001 Travel to Work Census data or for Elvington shows that 95.8% of journeys were made in cars, vans and motorbikes while only 2.7% were by bus, DDC fail to comply with this NPPF guidance.
- The methodology employed in Dover Rural Settlement Hierarchy 2020 SA to demonstrate sustainable transport is limited to establishing the proximity of new housing to a bus stop and / or train station. That is it. No analysis of commuting patterns, baseline traffic, modal split or journey to work data was considered. Neither was ONS Travel to Work Census data for Elvington shows 89% journeys are in private vehicles of while only 2.5% were by bus and 3 % by train. Evidence for Greenfield development car-dependency and the commuting pattern modelling in the Local Plan (Reg 18) Sustainability Appraisal 4.56 and 4.57 were not referenced in the report.
- In their Sustainability Appraisal of Growth Options in the Dover District Council Local Plan Topic Paper: Overarching Strategy (Part 1) point 1.5. DDC undertook to 'assess growth options in terms its likely effects on environmental...using available evidence and considering factors such as: Commuting patterns, Transport infrastructure, traffic congestion (and related air quality and carbon emissions issues. Where is this information in relation to Elvington.

If the purpose of Dover Rural Settlement Hierarchy 2020 is make a decision based on impartial evidence on transport sustainability, then these omissions are hard to account for. We are mindful of Ministry of Housing, Communities & Local Government 2020 LDP guidance advice on the importance of contextual data such as travel to work areas and that evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively.

Further informed by DM Policy 29, SA Part1 1.5 and NPPF parag 84, 102 a) + d), we believe a full travel plan with traffic modelling should have been considered before proposing Elvington as a strategic site in the LDP.

5.0 Transport & Highways

5.1 Transport & Infrastructure Evidence Base

The LDP doesn't provide the 'proportionate evidence base' for the highways and infrastructure the NPPF requires, against which the viability and deliverability of the plan's housing allocation can be assessed. This fails to meet **2019 NPPF guidance in particular 84, 102d and 108c but also 8c, 104b and 110c**

- There is insufficient evidence of commuter patterns with no comprehensive 'travel plan' provided for the northern rural section of the District. No data-based analysis of cumulative traffic impact or rural road roads is considered, nor has the relationship between the proposed new developments been fully assessed. It is, therefore, impossible to assess the viability and impact of DDC's housing allocation strategy choices.
- Dover District Council Draft Dover District Local Plan (Reg 18) Sustainability Appraisal detailed the District's experiences net out-commuting overall, particularly in the north and west Canterbury, Folkestone, Ashford and Thanet are all commuting destinations. The settlements of Dover and Sandwich experience the highest level of inward commuting in the District. Dover, Sandwich and Aylesham contain the highest number of employment sites. – Referenced in the SA, this crucial data has not informed the SA methodology or the LDP site allocation.
- No detailed highways infrastructure plan - costed or otherwise – is provided. Although, the Local Plan states it will be supported by 'an Infrastructure Delivery Plan which will 'identify specific infrastructure needs', this isn't currently available. The Ministry of Housing, Communities & Local Government 2020 LDP guidance advice stresses the importance of contextual data such as travel to work areas and that evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively.

The independent WHOLE PLAN VIABILITY STUDY and LDP Public Consultation will have be completed based on assumptions with no actual concrete infrastructure plan. This restricts accountability and transparency and makes a full appraisal of plan integrity impossible.

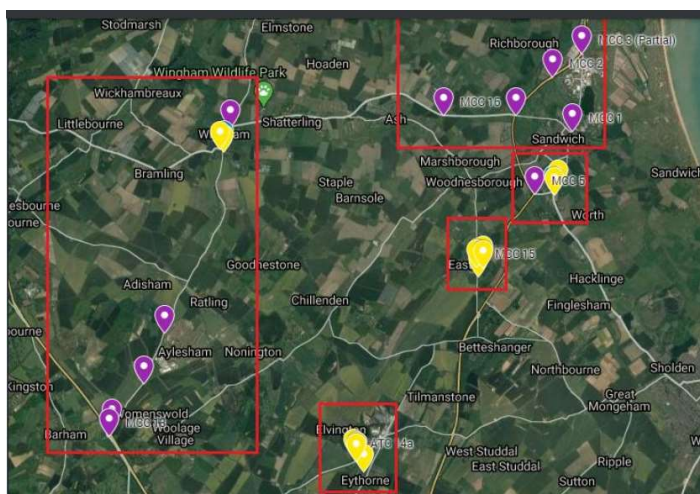
- In their Sustainability Appraisal of Growth Options in the Dover District Council Local Plan Topic Paper: Overarching Strategy (Part 1) point 1.5. DDC undertook to 'assess growth options in terms its likely effects on environmental...using available evidence and considering factors such as: Commuting patterns, Transport infrastructure, traffic congestion (and related air quality and carbon emissions issues.

Where is this evidence?

These shortcomings notwithstanding, listed below is an assessment of the provided DDTM data. This is restricted to the areas outside the DDTM modelling area set out in Chapter 8 of the DDTM (Reg 18 Traffic Plan Assessment 2020.

5.2 WSP's DDTM (Dover District Traffic Modelling Regulation 18 Traffic Plan Assessment 2020)

WSP's DDTM (Reg 18 Traffic Plan Assessment 2020) 513 page report conducted detailed modelling of the Dover and Deal traffic. Other areas were '**modelled in significantly less detail with only some roads coded in Aylesham**'.



Despite recognising the LDP '*leads to large increases in flow*' in Aylesham, WSP's analysis was, in practice, limited to a handful of ATC's (automatic counters) on the B2046 .

These are shown in Purple

The Elvington 'evidence' is even less robust. It consists of some manual data counts (shown in yellow). By citing proximity to A256, the implicit study assumption is that this the A256 is the primary route used. No empirical data collected on the traffic heading to the A2 / M2 / M26 or M25 from Elvington.

WSP provided no analysis of **(1)** the rural road capacity restrictions or **(2)** of baseline cumulative traffic from development to date or **(3)** the projected increase on the road network from the LDP.

The Highways England approved matrix information from the South East Regional Transport Model (SERTM) used by WSP in Deal has not been employed. There is an extensive resource of rural road network ATC data from Aylesham's s106 TA's (2007/ 2014/2018 etc) that could have been consulted. .

WSP '*noted that where additional highway network exists between count locations, for example in the Aylesham and Wingham cluster....it is considered that a proportion flow will turn off onto other small roads*'. However, data capture or analysis was undertaken.

The best information on commuting comes from **Dover District Council Draft Dover District Local Plan (Reg 18) Sustainability Appraisal** which detailed the District's experiences net outcommuting overall, particularly in the north and west Canterbury, Folkestone, Ashford and Thanet are all commuting destinations. The settlements of Dover and Sandwich experience the highest level of inward commuting in the District. Dover, Sandwich and Aylesham contain the highest number of employment sites. This suggest Elvington and Aylesham will have a significant impact on Nonington.

5.3 Testing WSP's Assumptions on non DDTM Sites

Nonington - Rural Highways Safety & Capacity Metrics

- Nonington is situated on an 8 mile stretch of road that connects the A256 and Sandwich in the East with the A2 and A260 Folkestone Road in the West, running directly south of the proposed Aylesham site. It also the quickest route from Elvington to the A2 via Mill Lane. (see satnav data below)
- A 1.2 mile section of this 8 mile route runs through the village of Nonington and is characterised by single car width access pinch points, blind corners and stretches with no pedestrian walkways.
- **ATC data 2014** 70,000 traffic movements per month . This includes HGV's and a recorded speeding problem. 3% of all traffic though the village is driving faster than the 30 mph limit. Speeds between 65 mph and 85 mph are regularly recorded
- **ATC data 2018** 90,000 traffic movements per month (ATC source MLM s106 Planning Condition 73 Data from the independent traffic assessments commissioned by the Parish Council and the telemetry data from the Parish Council funded Speed Monitor) **NOTE** no independent verification of Aylesham scheme occupancy at 03/18 provided.
- With 5 fatalities in 20 months, this is an accident black spot is now statistically one of the most lethal stretches of rural road in Kent.

2016 – 2018 FATAL CRASH LOCATION

Click on the map pin icons for crash dates and details



5.4 WSP's Assumptions

<p>Figure 3-5: Albert Lane Road Layout</p> <p>3.3 EXPLICITLY MODELLED DEVELOPMENT ASSUMPTIONS</p> <p>3.3.1 The uncertainty log information provided by DDC, in relation to committed housing and developments within Dover included the total number of dwellings and/ or jobs at each development site. This section outlines the key inputs and assumptions adopted in the network development for these developments.</p> <p>AYLESHAM AND SNOWDOWN SITES</p> <p>3.3.2 The Aylesham TA details a number of transport infrastructure improvement scheme to support the development, these are summarised as follows:</p> <ul style="list-style-type: none"> Changing the one-way link around the market square to provide a two-way link; Severing a short section of the market square link; Improving means of access to the site from the A2 to the west of Adisham Road to the north in conjunction with traffic calming; Traffic calming part of Aylesham Village to ensure 20mph speed zones; and Providing a new link road to the station in order to improve accessibility. <p>3.3.3 The primary access to the new village extension is from Dorman Avenue North. As the network detail within the existing DDTM currently only includes the B2046 in Aylesham, the Aylesham Village will be modelled via a junction between B2046 Adisham Road / Dorman Avenue North and will not consider the detailed modelling of traffic calming measures or the market square.</p> <p>REGULATION 18 DRAFT LOCAL PLAN ASSESSMENT Project No.: 70063260 Our Ref No.: 70063260 Dover District Council</p> <p>PUBLIC WSP January 2021 Page 14 of 168</p>	<p>WSP assumes traffic will go north and west of the new site. Is this correct?</p> <p>SatNav journey planning data provides a cost effective cross checking resource.</p>
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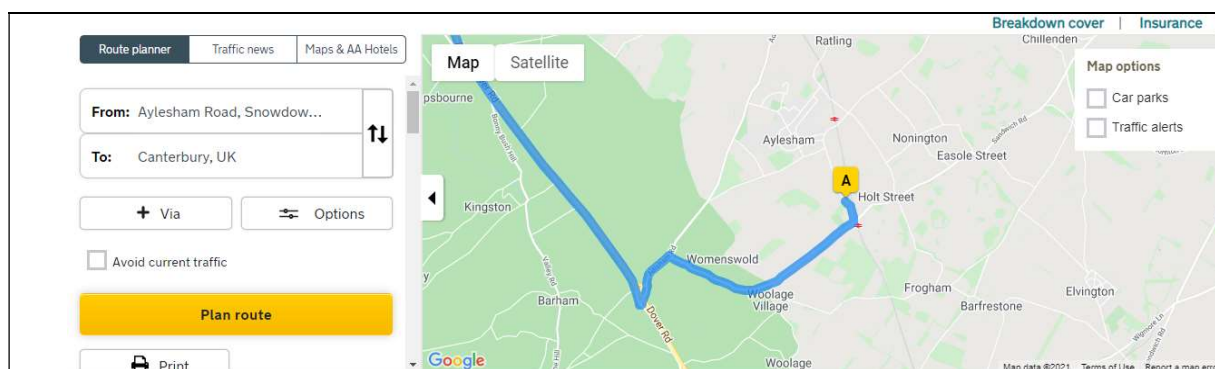


IMAGE 1 AA Route Planner Aylesham Road – Canterbury (Pre proposed Priority junction with Holt Street)

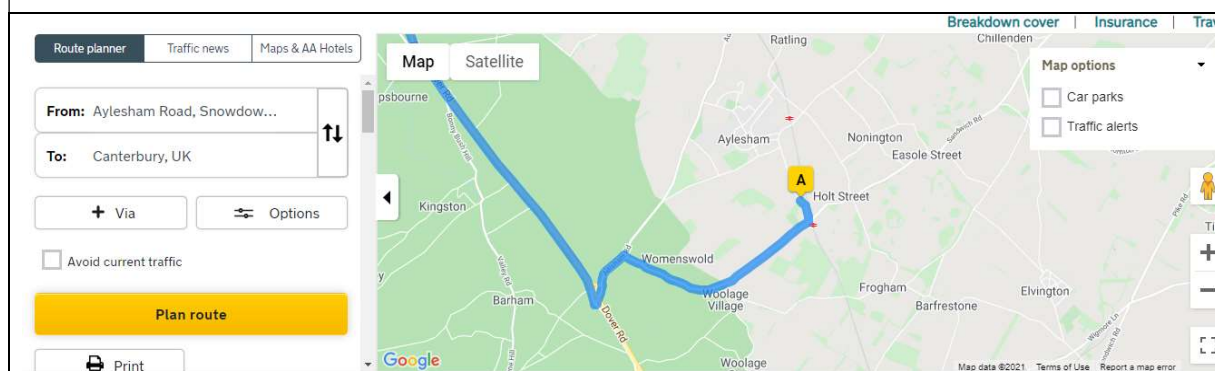


IMAGE 2 AA Route Planner Aylesham Road – Dover via Woolage Village (Pre proposed Priority junction with Holt Street)

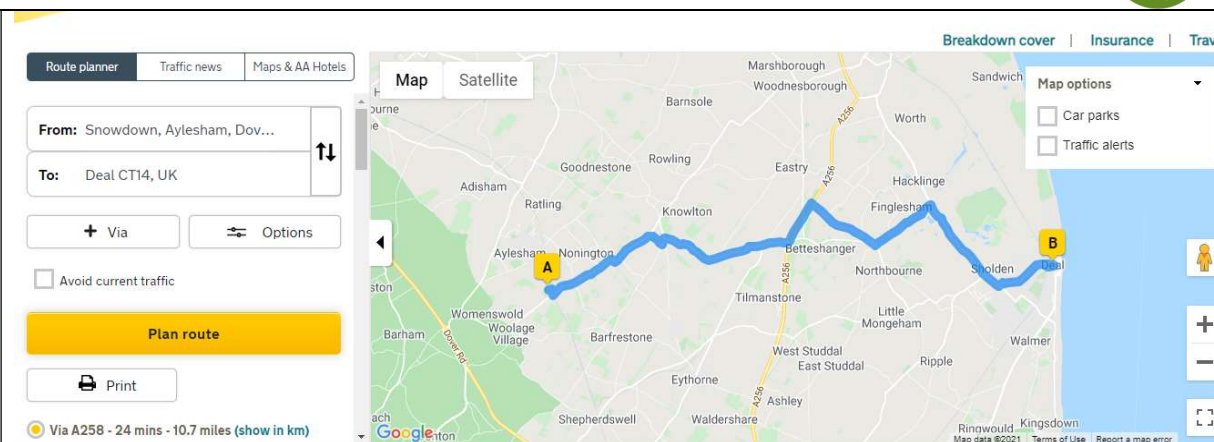


IMAGE 3 AA Route Planner Aylesham Road – Deal (Pre proposed Priority junction with Holt Street)

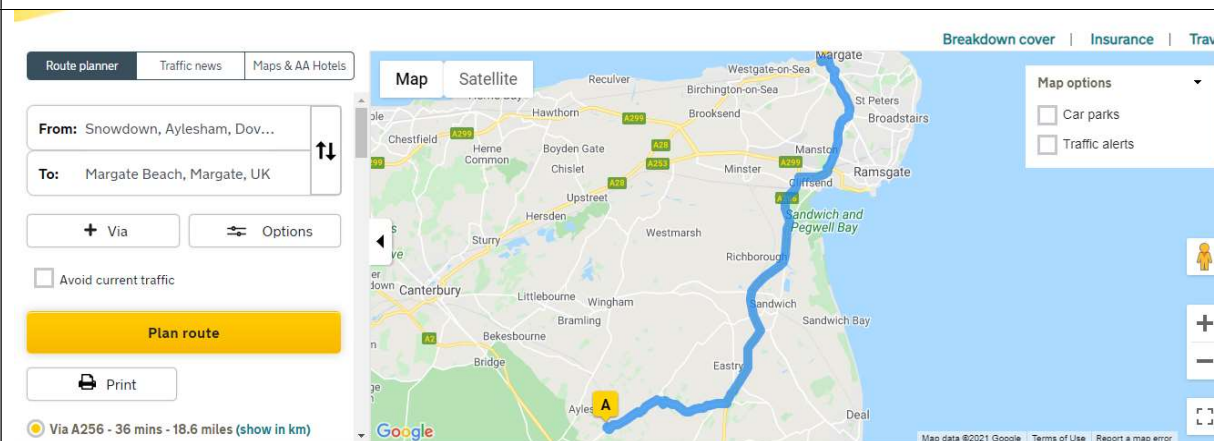
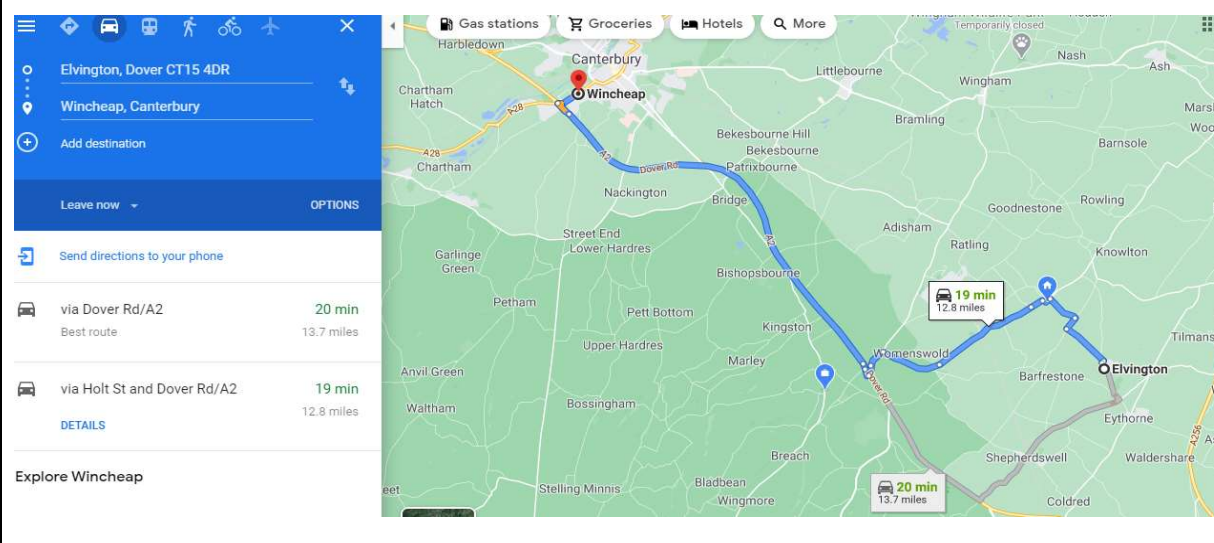


IMAGE 4 AA Route Planner Aylesham Road –Thanet) (Pre proposed Priority junction with Holt Street)

ELVINGTON – Assumption all traffic to A256. In fact all A2 traffic quickest route via Nonington





5.5 Previous Plan Period Impacts

Between 2014 and 2018, over 1800 new residential dwellings for which this route provides primary access have either been approved or have had applications submitted. These include:

1. 240 new houses in Sholden – Ward Homes (see AA Route Planner Traffic Time Data)
2. 1,200 dwellings in Aylesham – Ward Homes (Phase 1+2)
3. 141 dwellings Albert Road CT14 9RB
4. 19 Houses and 24 Industrial Units Hammil
5. 35 Houses The Street in Woodnesborough
6. 12 Houses Marshborough Rd – Beacon Lane – Woodnesborough
7. 120 new homes in Woodnesborough Road in Sandwich
8. 10 new Homes Snowdown
9. 32 Homes Prima Windows Site Nonington
10. East Kent Recycling waste management site. Cooting Road in Aylesham

The AA Route Planner data confirms why these developments affect capacity and safety on this route and across northern Dover's rural road network. DDC's failure to commission a district-wide Travel Plan means the acute rural road crisis continues unaddressed. The concern is that reflects deliberate policy decisions.

5.6 Rural Highways Safety & Capacity Traffic Issue Recognition

February 2021 Cllr Trevor Bartlett, the Leader of Dover District Council:

“for the Inland Border Facility to work, it must come with new investment in our already over-stretched local and strategic road network.”

November 2020 Lois Jarrett – Head of Planning

‘Government will be aware of the pressures that are suffered on (M2/A2) each route...which have impacted on the efficient operation of the network to the detriment of the East Kent and Dover area. Without significant improvements to these routes the ability to serve existing planned development and housing growth is compromised...indicates that viability challenges will inhibit growth in the absence of targeted investments to improve capacity’.

The stated recognition that the Dover districts rural highways network is under stress has not translated into an overarching evidence-based approach to the cumulative impact of developments on the rural road network. The impact on villages and rural communities hasn't been adequately assessed.

6.0 Sustainable Transport Commitment & Evidence

The LDP sets out the ‘**need to find more sustainable transport solutions, to cut the amount of private car use, traffic and resultant pollution... to tackle climate change, reduce carbon emissions and improve air quality**’.

There is a large body of evidence on sustainable transport systems and delivery. Public transport, cycling and walking uptake is highest in metropolitan and dense urban areas where use of public transport is typically 35%-50%. This falls dramatically in exurban and rural sites.



Source - Bennett Institute for Public Policy at the University of Cambridge 2020

Research into public transport, cycling and walking levels shows significant variations between sites based on socio economic factors as well as topographical factors. Broadly, the richer, the flatter, the better educated - the higher the uptake.

No evidence has been provided by DDC on how they propose to deliver their Sustainable Transport commitments set out in the LDP for the Greenfield sites in Whitfield, Elvington and Aylesham.

The available empirical evidence and modelling suggest these sites have very high rates of car usage.

	Aylesham	Elvington	Whitfield	Combined
Train	74 (4.1%)	60 (3.06%)	29 (1.4%)	2.3%
Bus	66 (3.6)	49 (2.5)	86 (4.3)	3.5%
Car/Van	1130 (62.0)	1544 (84.9)	1411 (69.7)	72.2%
Passenger in car/van	163 (8.9)	141 (7.8)	182 (9.0)	8.6%
Motorcycle	18 (1.0)	45 (2.5)	30 (1.5)	1.7%
Bicycle	29 (1.6)	19 (1.0)	34 (1.7)	1.4%
Taxi	0 (0)	9 (0.5)	6 (0.3)	0.26%
On foot	201 (11.0)	89 (4.9)	110 (5.4)	7.1%

Source *ONS Census Data Travel to Work 2001*

A Travel Plan study of the 785 completed units in Aylesham would provide evidence against which the LDP sustainability claims could be judged.

THE FACTS

- a. **71% of the LDP projected housing growth is on Greenfield** sites in Whitfield, Elvington and Aylesham. These Ex Urban centres with populations <25k typically have a maximum of 14% use of public transport for commuting.
- b. Using 2001 Travel to Work Census data for Whitfield, Elvington and Aylesham : 82.5% of all journeys were in a Car. Only 5.8% on public transport.
- c. Greenfield developments change the character of the countryside towards urban sprawl and inflict irreversible damage on wildlife.

As stated there is a lot of 3rd party evidence. This is summarised in **Appendix A** Q7 on page 24 of this report.

Crudely summarised the evidence holds that if you are serious about sustainable development and creating a low carbon economy, you **don't locate your development in land-hungry Greenfield developments with poor public transport and systemically high car usage patterns**. This is precisely the development pattern DDC have adopted in this LDP.

In the Rural Settlement Hierarchy, Regulation 18 Consultation on the Draft Local Plan December 2020, DDC confirm the NPPF guidance that **'in the first instance, the principle of sustainable development...which requires local planning authorities to ensure that, wherever possible, new development is located in the most sustainable locations'**.

Focusing 71% of all housing in out of town Greenfield sites seems to be fundamentally incompatible with this principle.

6.2 Evidence from Existing Sites.

One of the barriers to evaluating the soundness and deliverability of the LDP, is the absence of empirical evidence of the already delivered projects. Both the Whitfield and Aylesham Master Plans contained specific sustainable environmental, economic and transport commitments, yet there is no performance based evidence on these projects provided to support the sustainability claims in this LDP.

What new jobs were created in these locations 2010-20? What are the actual public transport use metrics? What are the crime metrics? How many journeys are made by bicycle? Where do the children in these new developments go to school? How many of the promised shops materialised. It is hard to think of a parallel in terms of cost and impact, where there is no scrutiny on past delivery. How do we know the LDP is not a ponzi scheme of undeliverable greenwashed policy commitments?

7.0 Highway Network and Highway Safety

The LDP commits DDC to ‘*upgrading local road infrastructure*’ and to refusing developments that generate ‘**severe cumulative residual impacts in terms of capacity and road safety**’.

In what represents a key threat to the village, DDC’s ‘*preferred options*’ for **Highway Network & Highway Safety**, gives them discretionary power over the practical enforceability of these commitments.

DDC seeks to secure the right to unilaterally decide:

- I. Whether Transport Assessments and Travel Plans are required.
- II. To subjectively adjudicate on what ‘constitutes a severe residual cumulative impact on the local highway’.

WHY DOES THIS MATTER?

Whether detailed road traffic information is required to be considered as material evidence on a planning application becomes a subjective decision that DDC can make with no independent oversight.

NPPF paragraph 109 says ‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe’.

The concept that rural locations should be treated differently to urban locations in sustainable transport terms is recognised. **NPPF 2019 states at paragraph 84** that in rural areas, sites to meet local needs may have to be found adjacent to or beyond existing settlements, in locations not well served by public transport. In these circumstances, it should be ensured that:

‘Development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable’

In addition – in relation specifically to Easole Street Conservation Area and to Fredville Park, DDC’s **DM Policy 45: Conservation Areas** states a commitment to prevent:

‘levels of traffic, parking or other environmental problems which would result in unacceptable harm to the character, appearance or significance of the Area;’

In all cases, these policy guidelines require the definition of ‘*unacceptable impact*’ or ‘*severe cumulative residual impacts*’. DDC seeks to make this definition unilaterally at DDC’s discretion.

In considering the implications of DDC’s preferred options, it is important to be mindful of:

- 1) the pressure placed on DDC to deliver on Central Government housing targets,
- 2) the fiscal incentives of the New Homes Bonus (NHB) scheme and,

3) potential conflict of interest between their fiscal interests as landowner and the statutory responsibilities as the planning authority. (DDC's net revenue gain on land sale and NHB on Aylesham estimate of **£24,000,000** see NOTE 1 below)

4) DDC's track record on:

- i. The Aylesham project where a Traffic EIA in 2013 and 2018 s106 on Planning Condition 73 - independent scrutiny of timing, methodology and scheme occupancy levels.
- ii. Guston 2020-2021
- iii. The selectivity of the evidence used in the LDP and the resultant confirmation bias.

NOTE 1

- i. Using the low strategic Greenfield land value assumption (£400,000 / hectare) in DDC's 2020 independent Plan Viability Report, the landowner windfall on 2013 Aylesham project was circa **£17,000,000**.
- ii. The **New Homes Bonus (NHB) 2019-20 paid to Dover was £1,728,587**. With Whitfield stalled, Aylesham was a primary contributor to the 19-20 tally. A provisional NHB Aylesham contribution of £7,000,000 since 2013.
- iii. S106 funding comes from developer. Total s106 expenditure on all village traffic mitigation measures 2013-21= **£0.00**

8.0 Climate Change & Environmental Impact

This LDP places climate change and carbon neutrality front and centre of its policy commitments, stating this *'Local Plan supports and helps to deliver the Council's approach to the climate change emergency through a series of policies which aim to ensure that development proposals, which come forward between now and 2040, mitigate against and adapt to the effects of climate change'*.

Yet over 67% all extant and proposed housing projected over the LDP period is on new build out of town (see section 4.2 on Whitfield) Greenfield sites. The environmental impact of Greenfield developments are well documented. Greenfield sites build at low housing densities and are a wasteful use of land; new roads, schools, health care, electricity, water, sewage and other carbon heavy services undermine the Council's zero carbon action plan. The evidence shows that even those developments near public transport have high car dependency.

We have been unable to reconcile how the housing type and distribution in the draft LDP aligns with the LDP's overarching commitments on climate change and carbon neutrality?

We have requested clarification on the methodology used (referencing the information inputs, assumptions and evidence used) for calculating whole lifecycle carbon footprint for Greenfield sites (/m3) and brownfield sites. We have requested performance based evidence on delivered units at Whitfield and Aylesham to support sustainability claims. In the absence of answers it is perhaps worth restating DDC's 2020 Local Plan (Reg 18) Sustainability Appraisal states that *to be sustainable 'housing development should, where possible, be concentrated in the three urban centres of the district, Dover, Deal and Sandwich'*. and should *'maximise the development of brownfield land.'*

This plan does not meet these objectives.

9.0 Economy & Employment

This section focuses on the sustainability of employment on the proposed sites at Aylesham and Elvington in accordance with NPPF 72 (b) obligation (also see NPPF parags 8 ,81 and 82) to ensure that sufficient access to employment opportunities are provided within the development itself.

The Strategic Housing Market Assessment (2017) highlight surplus labour in Dover. It predicts that when the population increases, ***'the increase in labour supply is much greater than the demand for jobs – causing increase in out-commuting, decrease in economic activity rates, increase in unemployment.'***

(Note this is unclear. We assume 'the demand for jobs' actually refers to the requirement for labour by employers).

Dover District Council Draft Dover District Local Plan (Reg 18) Sustainability Appraisal detailed the District's experiences net out-commuting overall, particularly in the north and west Canterbury, Folkestone, Ashford and Thanet are all commuting destinations. The settlements of Dover and Sandwich experience the highest level of inward commuting in the District. Dover.

This means that - unless on site employment is provided in accordance with NPPF 72b -then the additional residents of Aylesham and Elvington will have to commute to work. The SA work journey data suggests this will be internally to Dover and Sandwich, Canterbury, Folkestone, Ashford and Thanet. This has a significant carbon foot print and will impact the highway network including non A/B roads.

In accordance with NPPF 8,81, 82 and 72b the LDP is required to demonstrate how a strategic development will support a sustainable community, with sufficient access to services and employment opportunities within the development itself. From 2013 -2040 DCC propose 2,350 new dwellings in Aylesham. At a mean Dover dwelling occupancy density of 2.35, the population is set to increase by 5,250. **So how many new jobs have been added in Dover?**

To make the employment case for the concentration of development in Aylesham, the 'independent' Sustainability Appraisal states (4.7 SA 3), *' Sandwich and Aylesham contain the highest number of employment sites.* This appears to be leveraged to justify the employment case for 1700 dwellings in Aylesham (inc extant). Clarification on this point has been requested from DDC.

Aylesham the 2nd largest growth hub in the Dover District. WSP itemise over 1000 new jobs at 2 sites. We tried to find out more detailed information on the planned job creation strategy.

Table 5-5: 2040 Do Something Scenario, Explicitly Modelled Potential Employment Allocations

WSP ID	App Number	Site Address	No of Jobs	Associated Infrastructure
E_8072	SiteRef4	Aylesham Development Area	484	Access onto Aylesham Road
E_8073	SiteRef6	Betteshanger Colliery Pithead	106	Utilises the access onto Betteshanger Road
E_8074	SiteRef7	White Cliffs Business Park Phases I-III	3,698	Access onto existing roundabouts along Honeywood Parkway
E_8077	SiteRef14	Land off Holt Street, Snowdown, Aylesham	529	Priority junction with Holt Street

The largest of the 2 sites is on the grounds of the old Snowdown Colliery. Dover Economic Growth Strategy (2021) states

DDC propose to

*'Work with local partners to explore the opportunities for the delivery of Snowdown Park to create an **environmentally-friendly hub** for start-up businesses and **artisan producers**, and an international centre for research and development into the **health and welfare of the honey bee**.*

A long-term vision for investment in Snowdown, supporting business growth and the creation of 470 local jobs. The emerging proposals comprise establishing an internationally-unique destination, combining leisure, retail, hospitality and accommodation, subject to planning permission'.

However, is this actually a 'shovel ready' project? Privately, considerable scepticism has been expressed about the economically viability of this project given the listed buildings and eye watering ground remediation costs. The landowner confirms they have an existing tenant and this is not up for renewal or change. The SA states this is not be allocated as a strategic employment site and is not relevant to provision of employment opportunities are provided within the development itself. Confirmation of this has been requested from DDC.



OTHER SITES

- Aylesham Industrial Estate Estimated development potential **0 sqm** uses, but not to be strategic allocation. No new jobs here. Some were provided in the previous plan period by East Kent Skips whose depot, local residents will know, have contributed to our acute traffic problem.
- Aylesham Development Area - Allocated B1/B2 uses 8,500sqm Previous allocation. Rolled over from the previous plan Aylesham Development Area is the only site capable of delivering any employment. In the WSP (Traffic Consultant survey) it is listed as providing **484 jobs** of B1 and mixed B2. This equates to 17m2 / full time employee. For B1 light industrial the m2/ per full time employee (FTE) is 47 m2. For B2

it is 35m²/ FTE. For B1a (office functions) it is 10m². For light industrial use the site would provide 180 jobs. A significant proportion of the quoted 484 jobs would need to be office (B1a) jobs.

Given the requirement for a LDP to be 'realistic about what can be achieved' and the absence of B1a jobs in Aylesham, it is unclear if the 484 jobs is effective and can be delivered.

NOTE the b1 / b2 classification is replaced by Class E.

To be sustainable, the LDP is required to demonstrate how any large development will provide sufficient localised employment opportunities. It is unclear if the employment evidence is proportionate and robust enough to make the case for the provision of sufficient onsite employment provision is made to make the proposed Aylesham expansion 'sustainable'.



Appendix 1 Q&A

Q1 What is the overarching Local Authority responsibility framework?

According to the Local Government Association, local government areas and institutions should provide an effective expression of local and community identities that are important in civil society. Local governments should be genuinely independent centres of decision-making, with sufficient own financial revenues and policy autonomy to be able to make meaningful choices on behalf of their citizens.

Q2 What is a Local Development Plan?

The national planning policy framework (nppf) defines a local plan as: 'The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. ... Local plans are also the starting-point for considering whether planning applications should be approved.

The NPPF includes an environmental objective in local plan defined as 'to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'.

Q3 What is the presumption in favour of development?

The National Planning Policy Framework (NPPF) introduced the presumption in favour of sustainable development so that sustainable development is pursued in a positive way. There are three dimensions to sustainable development: economic, social and environmental. .

For plan-making this means that:

- plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change;
- strategic policies contained within local plans should, as a minimum, provide for objectively assessed needs for housing and other uses, unless:
- the application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

For decision-taking this means:

- approving development proposals that accord with an up-to-date development plan without delay; or
- where there are no relevant development plan policies or relevant policies are out-of-date, granting permission unless:
- the application of policies in the NPPF that protect areas or assets of particular importance provide a clear reason for refusing the development proposed; or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
- The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making.

Q4 How will the White Paper planning reforms affect us?

Described as a developer's charter, the government White Paper Planning for the Future sets out the most significant overhaul of the planning system since WW2. Key changes include:

- For areas in the LDP there will be 'statutory presumption in favour of development'.
- When and how the public would engage in the planning process would also change. The proposals in the White Paper will lead to a reduction in the role of locally elected members, 'streamlining' the input from members of the public at the application stage.

Disconnecting the benefits of planning gain from the local community, this risks undermining community involvement and support for the planning system in the pursuit of housing numbers.

- The November change in the proposed housing algorithm suggests just that, shifting the housebuilding emphasis to brownfield urban sites in the West Midlands and northern England, away from rural and semi-rural communities in the South East. Sadly, DDC appear wedded to delivering this environmentally destructive
- Conservative manifesto commitment at the last election, remains in place and new homes will still be built in the South, but the government will prioritise brownfield sites in England's 20 largest cities and other urban areas.

The following link provides an useful overview

[https://www.brownejacobson.com/training-and-resources/resources/legal-updates/2020/08/public-sector-the-planning-white-paper-what-does-it-mean#:~:text=Having%20a%20single%20set%20of,providing%20greater%20familiarity%20for%20developers.&text=The%20White%20Paper%20proposes%20ensuring,\(including%20local%20plan%20making\).](https://www.brownejacobson.com/training-and-resources/resources/legal-updates/2020/08/public-sector-the-planning-white-paper-what-does-it-mean#:~:text=Having%20a%20single%20set%20of,providing%20greater%20familiarity%20for%20developers.&text=The%20White%20Paper%20proposes%20ensuring,(including%20local%20plan%20making).)

This provides a more detailed analysis

[Debate on planning reform and housebuilding targets, House of Commons, 8 October 2020 | Local Government Association](#)



Q5 Do Local Authorities have a financial stake in plan delivery?

The UK Government 2019 overhaul of planning laws rules created central government targets for how many homes local authorities should build each year. This adopted a carrot and stick approach:

- The stick: Councils that fail to build enough homes will lose their right to determine where new houses are placed.
- The Carrot - New Homes Bonus provide a financial incentive to reward and encourage local authorities to help facilitate housing growth. Mainly funded by redistributing central government's core funding for local authorities. Some local authorities, face losing large amounts of their funding from central government. These authorities face growing financial risks, including to future service delivery

Conversely those local authorities willing and able to push through housing volumes despite local opposition are rewarded. In 2019 the New Homes Bonus paid to Dover was £1,728,587

Q6 Is DDC's online public LDP consultation engagement strategy robust?

This LDP matters to our village. Nonington Parish Council (NPC) are not opposed to digital LDP engagement. We recognise digital engagement's potential to redress planning's historic engagement bias towards an older demographic. However, to avoid disenfranchising the historically most actively LDP and planning engaged group, we believe it is essential digital migration must sit alongside traditional methods for those who cannot access information online.

Nonington has a high number of retired residents, many with no access to smart phones, broadband or email addresses. Public meetings and interaction form the basis of democratic participation in the village, with historically high levels of engagement across the demographic spectrum, especially on traffic issues.

Meetings are not possible during lockdown and GDPR compliance restricts the Parish Council's ability to contact other 'online' village residents via email. Distributing leaflets runs counter to the Government's stay at home guidance.

As Parish Council we are deeply concerned that DDC is - as a matter of policy - is systemically excluding a significant proportion of Nonington village residents from involvement in the consultation process either because they lack access to the internet or because they simply don't have any awareness of this LDP process.

These LDP proposals will have a significant impact on our village. That is why we have commissioned this report and are working hard to ensure the village's interests are fairly represented. But we can't do this alone.

Q7 Sustainability & Environmental Impacts Greenfield v's Brownfield Development

Too much of an increase in greenfield sites could eventually result in an “urban sprawl” within rural areas and leave larger towns and cities with insufficient green space. These developments are changing the character of the countryside towards urban sprawl. They are inflicting irreversible damage on wildlife.

What’s enabling this destruction is the national planning system, which ought to protect local communities, but now disempowers them. Planning has been hijacked by two doctrines. One is that pouring concrete will get us out of recession, the other that there’s a general housing crisis rather than an affordability crisis. Local challenges to these views are steamrollered as merely nimbysm.

Yet the housing developments championed by Jenrick do nothing to increase the number of affordable homes. Developers don’t want to build cheap starter homes. They prefer five-bedroom, low-density housing – hence the hunger for Greenfield sites, especially those near beauty spots, which are massively more profitable. Meanwhile developers shun available brownfield sites that CPRE estimates could support building 1m new homes. <https://www.theguardian.com/commentisfree/2021/feb/17/development-destroying-rural-england-action>

Aside from environmental benefits, redeveloping on brownfield sites also carries many economic perks. For example, dilapidated industrial sites can be transformed into shopping centres, thriving offices, public parks, family homes and more. They can breathe new life into neighbourhoods, and encourage the transformation of towns and cities by attracting a new lease of life. This can help facilitate job growth and local tax.

One of the main problems facing Greenfield development is environmental protection. Climate change and environmental destruction caused by human activity is a serious problem around the world today and a major concern in environmental education.

The Campaign Protect Rural England (CPRE) are also determined to encourage the reduction in greenfield site development. Rebecca Pullinger, Planning Campaigner CPRE believes more needs to be done: “Whilst the increase in the proportion of development taking place on brownfield land is promising, the lack of reduction in greenfield development is alarming news for those who love the countryside.”

She continued: “Without a clear, national policy that empowers councils to refuse applications for housing on greenfield land where suitable brownfield options exist, our cherished countryside will continue to be ripped up at an alarming rate”.

Concerns are also being raised around traffic congestion and pollution as locals commute from urban areas to the countryside. Too much of an increase in greenfield sites could eventually result in an “urban sprawl” within rural areas and leave larger towns and cities with insufficient green space.

Q8 Has the pandemic changed the housing supply equation for England?

The draft LDP ignores the economic, demographic and work patterns the pandemic has caused and, consequently, fails to capitalise on the planning opportunities to build back better.

Working from home and shopping online have hollowed out many urban centres, with offices and shops empty and unused. Could our struggling High Streets and business zones be repurposed as residential neighbourhoods? Public transport use has declined by around 90% in London since the national coronavirus lockdown was implemented calling into question the commuter dormitory town model.

This is currently a hot topic with Boris Johnson last week suggesting that the old commuting model will rapidly reassert itself as vaccination levels provide greater protection. However, this 'boosterism' is at odds with the evidence as major employers including **Lloyds, HSBC, JP Morgan, PWC, Google etc. adopt hybrid office and WFH rotational models**, capitalising on the cost cutting, talent acquisition and retention advantages of flexible working. Urban offices will continue to be an important employment hub but, as [Catherine McGuinness](#), chair of policy and resources at the Corporation of London, the governing body of the Square Mile stated in February 2021, *"We are pretty confident about people wanting to keep their big headquarters,"* she said. *"I worry what this means for the smaller supporting businesses. We may see a shakeout from the centre to the areas where people are basing themselves for the other days. It's inevitable, I suppose."*

This has profound implications for London and the potential for repurposing of commercial property for residential use. The fact that DDC's 20 years housing policy is based on 2016 data and is designed to facilitate London's metropolitan overspill, it is concerning that neither the threats nor the opportunities associated with these seismic changes in work patterns have been considered by DDC.

Q9 What is the political dimension to the LHN and Migration

It is true that central government forces housing quotas on local authorities and that people need housing. However, **people need the right housing in the right places.**

- In a 2015 report supplementing London's own local plan, the then Mayor Johnson's advisers earmarked east Kent is ripe for far denser development. 'Seeking commutable areas outside the capital where housing is currently at low density, they calculate Canterbury, Dover and Thanet could take 115,000 extra homes for Londoners, while Medway could accommodate an extra 100,000' (<https://www.kentonline.co.uk/canterbury/news/kent-could-bear-the-brunt-33026/>)
- Urban population relocation from London to Dover increases pressure on the district's housing, health and educational resources. This draft LDP fails to recognise or mitigate the impact of inbound migration from London. It fails to allocate housing where it is needed within existing communities. The resultant policy incoherence and inconsistencies mean the LDP risks delivering poor environmental, economic and social outcomes in the Dover district.
- In February 2021, Conservative MP Sir Roger Gale made an impassioned plea to "stop concreting over Kent", fearing that Kent has become a "dumping ground for London", with acres of valuable Kent farmland being lost to new housing built to house people from outside the area. <https://www.kentonline.co.uk/thanet/news/mps-fears-over-housing-ghettos-on-kent-farmland-242352/>.



- Dover's MP, Natalie Elphicke, is the **Chief Executive Officer of the privately funded Housing and Finance Institute (HFI)**, co-founded by housing developers Laing O'Rourke and Keepmoat Homes etc. The HFI's aim is "to boost the capacity and delivery of housing". In 02/20, Elphicke was appointed as a Parliamentary Private Secretary at the Ministry of Housing, the department responsible for the controversial planning reform White Paper.

TheyWorkForYou is an independent resource that takes open data from the UK Parliament on MP's voting records considered by issue. On environmental issues, it concludes that '**Natalie Elphicke consistently voted against measures to prevent climate change**'. [LINK](#).

- Swale Conservatives write to Secretary of State Robert Jenrick to extend Local Plan consultation ([LINK](#))

Cllr Alan Horton (Hartlip, Newington and Upchurch), a former police chief and leader of Swale council's Conservative Group, said: "This is the biggest, most important consultation the council carries out. To rush it through in the way the coalition administration is doing is simply wrong. "People need the chance to fully understand what the plan means for them and their communities and have ample time to respond".

Cllr James Hunt (Con, The Meads) said: "It is unrealistic to expect residents and parish councils to absorb such an enormous amount of information in such a short time, especially if the information is changing, incomplete or inaccurate. "Regardless of the many issues with the Plan, there has to be adequate time for consultation, and the council should extend the period." "The council needs to give those communities time to consider all aspects of what it is proposing."

Appendix 2 - Evidence Source Summary

In order to prepare an effective response to the draft LDP, Nonington Parish Council have undertaken an evidence-based review of the draft LDP.

In conducting this review we have consulted a range of evidence from:

- I. DDC's draft Local Development plan
- II. The independent 'Whole Plan Viability Study' conducted by HDH Planning
- III. DDC's Housing Policy 2020
- IV. DDC's Infrastructure Policy 2020
- V. Site Allocations Policy 1 Non-Strategic Housing Allocations
- VI. The HELAA Supporting SA Note on Growth Options Topic Paper
- VII. The HELAA Local Plan Topic Paper June 19
- VIII. The HELAA Appendix 1_Draft Local Plan Structure and Scope
- IX. Strategic Housing Market Assessment - Peter Brett Associates Parts 1&2 2017 + 2019
- X. Rural Settlement Hierarchy, Regulation 18 Consultation on the Draft Local Plan December 2020
- XI. WSP-dover-and-deal-transport-model-local-plan-forecasting-report-2021

In addition to the DDC information outlined above we have also consulted a range other sources including:

- I. National Planning Policy Framework Guidance 2019
- II. Planning for the Future - Planning White Paper August 2020
- III. Planning for the Future - Planning White Paper 2020 DDC Consultation Response Nov 2020
- IV. KALC response to the Planning White Paper
- V. Strategic-Housing-Market-Assessment - Peter Brett Associates
- VI. Ministry of Housing, Communities & Local Government -Travel Plans, Transport Assessments and Statements 6 March 2014
- VII. Good Practice Guidelines: Delivering Travel Plans through the Planning Process Department for Transport 2009
- VIII. COVID-19 and commuting travel choices 14 May 2020 - Bennett Institute for Public Policy at the University of Cambridge
- IX. UK National Travel Survey (NTS)
- X. National Travel Survey: 2019 Published 5 August 2020 - Department for Transport
- XI. Office for National Statistics – UK Census data 2001, 2011 & 2019 estimate.
- XII. Office for National Statistics – Subnational population projections
- XIII. Office for National Statistics – Household projections for England: 2018-based
- XIV. Office for National Statistics – National population projections: 2018-based
- XV. Local Government Association (LGA) briefing EU (Withdrawal) Bill
- XVI. PwC – Analysis of London Population Trends 2021
- XVII. Additional sources include BBC, Kent Online,



Appendix 3 – Request for Information - DDC



REQUEST FOR INFORMATION ON DDC LOCAL DEVELOPMENT PLAN



Fredville Park Nonington 2020

prepared by
Nonington Parish Council
March 2021

RFI TO DDC ON THE DRAFT LDP

Following a review of supporting evidence and 3rd party research, we would like to clarify a number of points we were unable to answer from the local plan documentation and evidence. We have provided positioning information on questions where required and request DDC respond to the specific questions asked individually using the number system below.

i. POPULATION

BACKGROUND

The LDP allocates 11920 dwellings in Dover's to meet local housing needs resulting from population growth and change 2020-2040 based on the standard method for assessing local housing need (LHN) using outdated ONS 2014-base population projections designed exclusively to deliver the Government's objective of 'significantly boosting the supply of homes.

We understand population projections underpin the objectively assessed need for housing. We understand that they are not forecasts and reflect the information inputs, assumptions and evidence used. We understand their reliability reduces with time. We mindful of the risk associated basing a plan on 2014 base data without considering the published 2016 or 2018 data or the impacts of the pandemic or Brexit.

We are confident DDC will have considered a range of realistic population scenarios based on the latest projections and legitimate variations and will be happy to share the information inputs, assumptions and evidence for making any projections supported by their robust evidence base.

- a. What proportion of the district's total population growth 2020-2030 does the LDP's population projections attribute to natural growth of the baseline population?
(Note – Where figures for the time period don't align to the available data please provide the nearest comparable. For example for (a) above, 2020-2040 figures are fine if that is what you have).
- b. What proportion of the district's total population growth 2020-2030 does the LDP's population projections attribute to net inward migration from outside the district?
- c. What is the difference between the LDP migration figure in answer a) above and the net inbound migration figure provided in the most current ONS projections for the Dover District from Subnational population projections for England 2018 based)?
- d. What % of total 2020-30 net inbound migration figure provided for (B) above does DDC LDP population projection modelling project to be from social housing relocation from other Local Authority placements from outside the area?
- e. Referencing Dover's migration flow data and housing search patterns, excluding Whitfield, Aylesham and Elvington, what impacts does this LDP model inbound migration will have on for the housing supply and affordability in the rest of districts coastal towns and villages 2020-2040?



In 02/19 the UK government stipulated use of 2014-based projections as the demographic baseline for the LHN standard method. The LHN figure is further distorted and skewed upwards by the changes to the 2019 NPPF parag 35a.

- f. Dover Strategic Housing Market Assessment Partial Part 2 update 2019 Point 24 identifies the ONS 2016 figures reduced the national numbers of houses required by 15% from the 2014 figures. What is LNH number for Dover calculated using the ONS 2018 base sub national population projection for local authority areas?
- g. Using ONS 2014-base what % of the 11,920 dwellings are allocated specifically to deliver the 2019 NPPF parag 35a requirement accommodate unmet need from neighbouring areas in this local plan?
- h. NPPF 2019 require an LDP to ensure '*Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements*'. A 2020 analysis of the latest ONS data published by Cambridge University's Public Policy Institute Cambridge University and 2021 King's College London research paper into the latest ONS UK employment data both estimate the biggest drop in UK population of over 1 million (the biggest since WW2) because of Brexit and Covid-19. How do the demographic modelling assumptions in the LDP accommodate the projected impact of Brexit and Covid-19 on the UK and Dover demographics and migration?
- i. DDC's website states 'The population is forecast to increase by 10.7% between 2018 and 2038, which would increase the population size to 129,400'. This is an average of growth of 620/annum or 6,200 / decade. ([Source data](#)). Using mean occupancy density and the 596 - 630 dwellings / year LDP targets we get 14,006 - 14,805 population growth in 10 years. **This is 220% - 240% higher than you own quoted population projections.** (We understand that they are not forecasts and reflect the information inputs, assumptions and evidence used.)

Q Is the 129,400 figure on DDC's website still accurate? If not what is the revised growth prediction? (Please indicate data source and year)

- j. The 2018-based ONS local authority population projections note housing policy is an engine of inbound migration. Build and they will come. DDC's LDP's 'overarching vision' for Dover District in 2040 is built on encouraging inbound migration: 'Dover District in 2040 will be a destination of choice for people of all ages to make their home'.

What % of total net inbound migration to Dover 2010-2020 have DDC calculated were a direct result of DDC's LDP housing policies?

- k. What % of total net inbound migration to Dover 2020-2040 do DDC estimate will directly result from the housing allocation in this draft LDP?
- l. Current UK mean dwelling occupancy in 2.4. In Dover district it is 2.35. What does this LDP's demographic modelling assume it will be in 2025 and in 2035?



ii. DWELLING DISTRIBUTION

BACKGROUND

Government guidance states that LDP should be ‘written in plain English to help ensure that it is easily accessible to local communities, to avoid them becoming disengaged with the process’.

The Sustainability Appraisal Overarching Strategy (Part1) identified 3 growth options for dwelling distribution. This was expanded to 5 spatial options in the draft LDP. DDC selected a hybrid of 3 of the 5 options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). To be ‘sustainable’, this ‘hybrid’ requires the district settlement hierarchy to be altered by DDC (Elvington) and for a geographically separated greenfield new town development in Whitfield to be presented as ‘Dover’ using an administrative unit ‘for planning purposes’ and for the cumulative and synergistic effects of traffic levels, modal split and highways environmental impact to be excluded from the assessment.

DDC’s 2020 Local Plan (Reg 18) Sustainability Appraisal states ‘The continued national policy emphasis on sustainable development means that *‘housing development should, where possible, be concentrated in the three urban centres of the district, Dover, Deal and Sandwich’*. and should *‘maximise the development of brownfield land.’*

However, we have been unable to locate the population / settlement, the proportion of LDP allocation per settlement and the Greenfield v’s brownfield ratio across the district and by settlement.

The inconsistent use of extant and the presentation of the distribution of housing growth in the District by settlement type are problematic. For example:

- Sandwich - a town of 5000 people and the highest house prices in the area - is allocated 324 dwellings in the LDP.
- Aylesham a former mining ‘village’ with some of the lowest house prices in the district and a population of 4000 gets 1,700 dwellings.

However, the LDP evidence combines them to form ‘*Sandwich; Aylesham (Rural Service Centres) with 19.83% of housing allocation’*. Similarly the LDP claims that Dover gets 47% of all housing. Take out Whitfield Greenfield development and this figure drops to 9%.

This conflation of separate settlements by settlement type is not just academic. It is being leveraged to ‘prove’ sustainability of the proposed LDP. For example, to make the employment case for the concentration of development in Aylesham, the ‘independent’ Sustainability Appraisal states (4.7 SA 3), ‘*The settlements of Dover and Sandwich experience the highest level of inward commuting in the District. Dover, Sandwich and Aylesham contain the highest number of employment sites.*’

Over 10 miles and an economic universe away from Aylesham, Sandwich’s employment – mainly at Discovery Park - is being cynically leveraged to justify the employment case for 1700 dwellings in Aylesham (inc extant).

We are concerned this skews supply and demand visibility, disguising the fact that insufficient housing is allocated where the population growth is projected.



- i. Can you clarify:
 - a. What % of the LDP 11920 dwellings are in strategic Greenfield developments?
 - b. What % of the 11,920 dwellings are in:
 - i. The Aylesham and Elvington ward?
 - ii. The Whitfield electoral ward?
 - c. What population growth does the LDP project for each of these wards over plan period?
- ii. What % of all sites are brownfield?
- iii. What % of brownfield sites in the LDP are extant?
- iv. Broken down by settlement, what % of total LDP brownfield sites in the LDP are in (a) Dover (DOV ___ sites excluding Whitfield), (b) Sandwich and (c) Deal?
- v. The Dover Strategic Housing Market Assessment Partial Part 2 update December 2019 states that, 'For the purposes of progressing the draft plan, 630 dpa should be regarded as the minimum housing number'. Why doesn't the LDP use this number?
- vi. Garrington's 2021 research into the best the areas to buy a house in Kent place 3 of Dover District Towns in Kent's top 50 locations, with **Dover** at 26th, **Sandwich** 12th and **Deal** the 9th best spot in Kent to buy.

As people move into these towns, it increases pressure on the supply of houses pushing up prices. The less supply, the higher the price, the more likely it is that locals are will be priced out of their towns and villages.

By allocating LDP dwellings where, the LDP can mitigate this impact. We assume DDC have formulated policies to accommodate net inbound migration into Dover, Deal and Sandwich over the next decade. However, we haven't been able to locate these. **Using Deal as an example, the town has 26% of the district's population but only 2.65% LDP dwellings. It the 9th most attractive location home purchase and for 2nd homes.**

- i. What are DDC's 5 year and 10 year demand and supply projections for Deal's housing market?
- ii. What is DDC policy to mitigate residents being priced out of the town?



III. SETTLEMENT HIERARCHY & BOUNDARIES

- i. The LDP's non-strategic site allocation divides sites in sites in Dover (**DOV** _ _ _) and sites in Whitfield (**WHI** _ _ _). The strategic sites classes Whitfield as Dover. Why the discrepancy?
- ii. What date was Whitfield added in to the Dover Urban Area?

In December 20 Elvington was reclassified. This facilitated it's inclusion as a strategic site in the LDP. The LDP is required to demonstrate that development is placed in the most sustainable area and that sustainable transport provision is modelled at the earliest opportunity.

The methodology employed in Dover Rural Settlement Hierarchy 2020 SA to demonstrate sustainable transport is limited to establishing the proximity of new housing to a bus stop and / or train station. That is it. No analysis of commuting patterns, baseline traffic, modal split or journey to work data was considered. Neither was ONS Travel to Work Census data for Elvington shows 89% journeys are in private vehicles of while only 2.5% were by bus and 3 % by train. Evidence for Greenfield development car-dependency and the commuting pattern modelling in the Local Plan (Reg 18) Sustainability Appraisal 4.56 and 4.57 were not referenced in the report.

If the purpose of Dover Rural Settlement Hierarchy 2020 is make a decision based on impartial evidence on transport sustainability, then these omissions are hard to account for. We are mindful of Ministry of Housing, Communities & Local Government 2020 LDP guidance advice on the importance of contextual data such as travel to work areas and that evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively.

Further informed by DM Policy 29, SA Part1 1.5 and NPPF parag 84, 102 a) + d), we believe a full travel plan with traffic modelling should have been considered before proposing Elvington as a strategic site in the LDP. However, we are not planners and welcome you clarification on the following:

NOTE: *Many of these issues are related to sustainable transport. Because they are directly relevant to the reclassification of Elvington & Eythorne, they are listed below.*

- iii. How do DDC believe their approach in Elvington meets the policy framework requirements on DM Policy 29, SA Part1 1.5 and NPPF parag 84, 102 a) + d).
- iv. Which of the following data sources were used Dover Rural Settlement Hierarchy 2020 reappraisal:
 - ATC data? Y/N
 - SERTM data? Y/N
 - Nomis data? Y/N
 - DataShine ? Y/N
- v. AA Route planner identifies Adelaide Road northbound (Mill Lane and Holt Street) at the quickest route to northbound A2 (M2 / M25/M26). In the sustainability assessment for site inclusion, what % of new site traffic does DDC assume will go to the A2, M2, M26 and M25?

- vi. In accordance with **NPPF parag: 84, 108 c and 109 + DM Policy 29**, what increase in traffic on Tye Wood and Mill Lane would DDC identify as constituting a severe cumulative impact and generating *inappropriate levels of traffic generation or unsuitable traffic movements* (This can be expressed monthly / daily / peak hour as either % increase or total volume).
- vii. Local Plan (Reg 18) Sustainability Appraisal states *'The scale and distribution of growth dictated by the Local Plan will influence carbon emission generated by resident and worker's need to use private vehicles'*. With reference to traffic data, travel to work areas, modal split and projected cumulative levels of traffic generation on the non-primary and secondary route network (DM Policy 29) and A2 junctions projected from the proposed Elvington Development, please clarify how the 350 houses in Elvington will meet SA objective SA4.4: to address road congestion?
- viii. Local Plan (Reg 18) Sustainability Appraisal identifies the need for a TA on Elvington's sites. Given the evidence gaps, the settlement hierarchy changes and its inclusion as strategic site, why do DDC believe a full travel Plan is not required? (It should be).
- ix. A village is defined as having between 500 and 2,500 inhabitants. Based on this LDP, Aylesham will increase size from 2011 base by 225% to 4,500 dwellings with a population of 10,500. Are DDC going to reclassify it as a town? If not why not?

IV. SUSTAINABLE TRAFFIC

Aylesham is the 2nd largest growth hub in the LDP. Including extant, a further 1700 dwellings are proposed in the plan period. Despite projecting 'large increases in (traffic) flow', for Aylesham, the traffic data in the area north of the A256 was modelled in '**significantly less detail**' by WSP. In terms of the 2 strategic sites the entire traffic assessment is based on ATC data from just one road, the B2046, and some manual counts in Elvington.

WSP's report offered no conclusions on the area north of the A256 as it was outside the DDTM area. WSP explicitly recognise the porosity between traffic from B2046 and the local roads yet no data-based analysis of rural road capacity or cumulative traffic impact have been provided. Neither the Aylesham s106 ATC data nor the SERTM mobile GPS data have been considered in modelling Aylesham's or Elvington's traffic impacts.

Dover District Council Draft Dover District Local Plan (Reg 18) Sustainability Appraisal detailed the District's experiences net out-commuting overall, particularly in the north and west Canterbury, Folkestone, Ashford and Thanet are all commuting destinations. The settlements of Dover and Sandwich experience the highest level of inward commuting in the District. Dover, Sandwich and Aylesham contain the highest number of employment sites. – Referenced in the SA, this crucial data has not informed the SA methodology or the LDP site allocation.

The Planning Advisory Service guidance on good plan making advises that, when appraising strategic options, Sustainability Appraisal should consider if the plan likely to displace environmental problems or lead to increased traffic generation in adjacent areas. This hasn't happened.



How did DDC deliver on their commitments in **Sustainability Appraisal of Growth Options set out in the Dover District Council Local Plan Topic Paper: Overarching Strategy (Part 1) point 1.5**. Specifically to assess growth options in terms *its likely effects on environmental...using available evidence and considering factors such as: Commuting patterns, Transport infrastructure, traffic congestion (and related air quality and carbon emissions issues)*?

Please identify supporting evidence on commuting patterns, transport infrastructure, traffic congestion, air quality and carbon emissions issues for 1) Aylesham and 2) Elvington.

1. With less than 8% of Dover's population in 2011, the Aylesham and Elvington ward have been allocated 18.5% of the proposed housing in the LDP. With no detailed traffic data how do DDC propose to meet obligations under NPPF para 102 a) and d) that (*Transport issues should be considered from the earliest stages of plan-making and development proposals, so that::a) the potential impacts of development on transport networks can be addressed; d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account*)' ?
2. The SA states Elvington has 'relatively good access to existing local rail and bus services'. We disagree but are interested in real world evidence for improving public transport uptake.

Referencing recent transport modal analysis on the completed units in Whitfield (required by Whitfield 2010 Sustainability Appraisal) and at Aylesham, what % of Elvington and Eythorne journeys to work are DDC projecting will be on public transport in 2025 and 2030?

3. DDC preferred option on Travel Plans, Travel Assessments and the subjective definition of 'severe' and 'unacceptable' cumulative traffic impacts provides an effective veto on objections based on highways impacts. The LDP (Highway Network and Highway Safety) states:
 - a. 'It is the Council preferred option..' in relation to TP's and TA's
 - b. 'the Council's preferred policy option' in relation to subjective definition of 'severe' and 'unacceptable' cumulative traffic impacts.

Preferred policy option means other policy options exist. What are the other options for a) and for b)?

4. Assuming preferred option adoption, using the proposed Aylesham expansion as an example:
 - c. With Strategic Policy 5 (11) and Strategic Policy 6 (13), will DDC be able to dictate whether Travel Plans or Traffic Assessment are required (or not) on an application by application basis? Our concern that this would 'balkanise' traffic impacts and s106 contributions.

(We recognise Master Plan (MA) provides SA guidance but note divergences from both the Whitfield Urban Expansion MA and Aylesham Garden Village MA). .
 - d. We note DDC's preference for s106 (rather than the proposed levy in Planning for the Future White Paper), however, in the event the levy replaces s106, how will this impact on scenario (a) above?



5. In accordance with **NPPF parag: 84, 108 c and 109**, what increase in traffic on Holt Street & Easole Street (contributed to by Aylesham and Elvington development) would constitute a severe cumulative impact? (This can be expressed monthly / daily / peak hour as either % increase or total volume).
6. **DM Policy 29:** The Highway Network and Highway Safety states '*Traffic generated by development should normally be targeted towards the primary and secondary route network in the District. Other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements*'.

What increase in traffic on Holt Street & Easole Street resulting from Aylesham and Elvington would constitute inappropriate levels of traffic generation or unsuitable traffic movements? (This can be expressed monthly / daily / peak hour as either % increase or total volume).

7. **DM Policy 45:** Conservation Areas: undertakes '*not to generate levels of traffic, parking or other environmental problems which would result in unacceptable harm to the character, appearance or significance of the Area*'.

Specifically in relation to Easole Street Conservation Area and Fredville Park please quantify the traffic levels required to constitute 'unacceptable harm'.

The absence of any empirical benchmark data and or methodology in response to questions 5.5, 5.6 and 5.7 would serve to underline the danger to the rural highway network posed by 5.3 above.

v. CLIMATE CHANGE & ENVIRONMENTAL IMPACT

- 5.1 This LDP places climate change and carbon neutrality front and centre of its policy commitments, stating this '*Local Plan supports and helps to deliver the Council's approach to the climate change emergency through a series of policies which aim to ensure that development proposals, which come forward between now and 2040, mitigate against and adapt to the effects of climate change*'.

Over 70% all extant and proposed housing projected over the LDP period is on new build out of town (see 6.2 below) Greenfield sites. The environmental impact of Greenfield developments are well documented. Greenfield sites build at low housing densities and are a wasteful use of land; new roads, schools, health care, electricity, water, sewage and other carbon heavy services undermine the Council's zero carbon action plan. The evidence shows that even those developments near public transport have high car dependency.

We have been unable to reconcile how the housing type and distribution in the draft LDP aligns with the LDP's overarching commitments on climate change and carbon neutrality?

- I. Referencing the information inputs, assumptions and evidence used, what is DDC per dwelling whole lifecycle carbon footprint for Greenfield sites (/m3)?
- II. Referencing the information inputs, assumptions and evidence used, what is DDC per dwelling whole lifecycle carbon footprint calculation for brownfield sites? (/m3)

5.2 We recognise that for 'planning purpose' this LDP treats Whitfield as Dover. However, from an SA / EIA perspective there is evidence to suggest this is misleading. A spatially distinct settlement 6.4 km and an hour's walk from Dover's train station and shops, Whitfield is socio geographically a separate new town development on a greenfield site with separate out town shopping.

- The Whitfield Master Plan states: 'the Dover Transport Strategy recognises 'the severance of Whitfield by the A2 and its walk time from town centre and local topography'.
- The 2020 Plan Sustainability Appraisal stated (4.50): 'The allocated Whitfield Urban Extension is of a scale large enough to be described as a new settlement.'
- The Whitfield 2010 Sustainability Appraisal recognised the risk of increased car dependency and stated: *'There will be a need to closely monitor delivery of proposals, as it will be critical that a culture of reduced car-dependency is enshrined from the outset'*.
- The 2020 Plan Sustainability Appraisal stated (6.4): Housing growth is concentrated in'..Dover and neighbouring Whitfield.'
- The non-strategic sites in the LDP are divided into Whitfield (WHI __) and Dover (DOV __ __)

QUESTIONS

- I. Can DDC share the empirical evidence of travel to work, bus usage etc. from the car use monitoring stipulated in 2010 Sustainability Appraisal?
- II. Can DDC provide similar transport mode / journey data on car usage v's public transport based on the completed and occupied units in Aylesham to support their claims to sustainable development in Strategic Policies 5 &6?

5.3 Dover District Council Draft Dover District Local Plan **(Reg 18) Sustainability Appraisal C2**. States 'Specific areas of Dover have particularly low levels of car ownership and in some cases, higher levels of unemployment. As such, residents in these areas including the elderly are becoming increasingly reliant on local bus services. Inappropriately located development without a good range of sustainable transport links could exacerbate people's access to services, facilities and employment.

- What is the level of car ownership in Whitfield?
- What is the mean car ownership across the whole Dover Urban Area?



7 ECONOMIC & EMPLOYMENT

7.1 Whitfield social housing provision. In 2010 DDC waived the usual 30 per cent affordable housing requirement. What % of total LDP affordable housing provision 2020-40 is in:

- I. Whitfield?
- II. Aylesham?
- III. Elvington?
- IV. Sandwich?
- V. Deal?
- VI. Dover – (excluding Whitfield)?

7.2 Aylesham Employment

- I. WSP's report models 529 jobs at the Snowdown Colliery site. The Dover Economic Growth Strategy (2021) predicts 470. Which is correct and why?
- II. On the Snowdown Colliery site the landowner confirms they have an existing tenant and this is not up for renewal or change. Given the requirement for a LDP to be 'realistic about what can be achieved' and 'the need to work with landowners at an early stage in the plan-making process', what evidence is there that the employment numbers assigned to the Snowdown Colliery site are deliverable?
- III. If the Snowdown Colliery site is not viable in the time period, should these employment number be removed from the LDP?
- IV. WSP's report models 484 jobs at the Aylesham Development area. This is the only Local Plan (Reg 18) Sustainability Appraisal strategic employment site in Aylesham'. Subject to clarification on (ii) above, it is the only viable employment site in Aylesham.

Suitable site for mixed use, B1 and potentially some B2 due to close proximity to residential uses this 8,500sqm site is extant. What mix of B1c and B1a and B2 is being projected for this development?

- V. Given likely achievability of employment-led development in Aylesham Development area, what proportion of B1a is achievable, taking into account market signals and B1a space in Aylesham to date?
- VI. Parag 4.7 SA 3 Employment states, '*The settlements of Dover and Sandwich experience the highest level of inward commuting in the District. Dover, **Sandwich and Aylesham contain the highest number of employment sites.*** This conflation of separate settlements by settlement type to make the sustainable employment case for the development in Aylesham is clearly erroneous and misleading. Please, therefore, clarify the number of employment sites in
 - a. Sandwich?
 - b. Aylesham?



- VII. Please clarify how Aylesham performs against the SA3 objectives based exclusively on viable employment site allocation in Aylesham without Sandwich?
- VIII. Based on you answers (i) – (vi) above, please clarify that whether this provides sufficient on site employment provision on the proposed LDP Aylesham expansion (inc extant) to be 'sustainable'?

8 VARIOUS

- 7.1 Where DDC is both landlord and planning authority what processes do DDC put in place to separate the independence LPA oversight function on an s106 process from the LA's commercial interests?
- 7.2 The LDP states, 'Once the Local Plan for the District is adopted, the whole Plan Viability Assessment will become the reference point for any future viability assessments submitted through the Development Management process.'

The authors of Plan Viability Assessment confirm, their assessment: 'does not have site specific estimates of the strategic infrastructure and mitigation costs for the Strategic Sites'. Do DDC see this as an obstacle to the adoption of their preferred approach as set out above?

- 7.3 Dover District Council Draft Dover District Local Plan (Reg 18) Sustainability Appraisal, fails to include Fredville Park. The LDP specifically references it. Is this an error in the SA?
- 7.4 As AYL003 was already one of the weakest performing site options in and around Aylesham and Sandwich in the SA, in light of the gaps in the sustainable transport evidence used, the errors in the employment evidence and the questionable decision in the SA methodology to combine Sandwich and Dover to gerrymander the SA results, can AYL003 still be classed as sustainable?



RECOMMENDATIONS

The LDP contains several thousand pages of well-presented reports, policies and supporting information. However, there is a high level of assumption interdependency, what WSP, call the **‘uncertainty log information’** when describing the housing and employment numbers DDC provided.

This is the biggest, most important consultation the council carries out. The proposed changes to the planning system make this the primary chance for communities and stakeholders to have democratic involvement. To rush it through is simply wrong. People need the chance to fully understand what the plan means for them and their communities and have ample time to respond.

It is unrealistic to expect residents and parish councils to absorb such an enormous amount of information in such a short time, especially if the information is changing, incomplete or inaccurate. Regardless of the many issues with the Plan, there has to be adequate time for consultation.

We believe the council should commit to a Regulation 18b consultation. This should provide:

- Full Travel Plans providing integrated district-wide data on rural roads capacity and highways impacts.
- Transparent benchmarking for calculating severe and cumulative impacts and for deciding when travel plans or travel assessment should be set out.