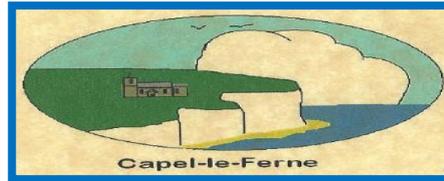


CAPEL-LE-FERNE PARISH COUNCIL

Clerk to the Council
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22 February 2017

Daniel Broadfield
Support Officer
Planning Section
Dover District Council
White Cliffs Business Park
Dover
Kent
CT16 3PJ

Dear Mr Broadfield

For the attention of Case Officer, Myles Joyce

Ref: Acolaid Case 16/01316

Outline planning permission for the erection of 10 flats in 2 no. blocks (6x1 bed and 4x2 bed); and 31 dwellings (10x2 bed, 15x3 bed and 6x4 bed); plus associated access and parking (with appearance, landscaping and scale reserved)

Location: Land between Nos 107-127, Capel Street, Capel-le-Ferne, CT18 7HB

During the consultation on the Land Allocation Local Plan, the Parish Council presented objections to the development of this site for 50 units, preferring ribbon development along the frontage. These objections, based on genuine concerns about traffic volumes and housing density, were over ruled by HM Inspector of Planning.

Capel-le-Ferne Parish Council objects to the outline planning application in its current form for the following reasons:

The Land Allocation Policy LA 26 states that the site is allocated for residential development, with an estimated capacity of 40 dwellings. Planning permission will be permitted provided that:

- i. **The design and layout should incorporate frontage development with adequate parking arrangements.**

Although the Parish Council appreciates that the hedgerow fronting Capel Street will provide a visual screen, the Council considers the positioning of the 6 x 4 bed houses at the front of the site to be overbearing and not in keeping with the street scene in the immediate area. A mix of housing fronting Capel Street would be more appropriate.

The Council also considers the proposed site layout leaves some properties with a lack of parking facilities, notably plots H14, H21 and H22. Although it is recognised that the communal parking areas could be seen to be primarily for the flats, they do give an urban feel to the site and could lead to anti-social behaviour amongst residents. If flats are to be included, they should have their own dedicated parking areas.

Continued ...

Furthermore, H10, H11 & H12 are 2 bedroom / 4 person houses with one parking bay. In total the proposal identifies 75 parking spaces for 41 different size units or 103 bedrooms. Where are these persons expected to park? The Parish Council do not believe the number of parking spaces appropriate for such a large scheme and this will encourage anti-social parking, or parking in Capel Street which is totally inappropriate and dangerous.

The Council would prefer to see parking stands adjacent to properties rather than at the front of each property, thus giving a more rural and open feel to the site.

- ii. **The existing boundary hedgerows and vegetation to the west are retained;**
- iii. **A landscape buffer is provided along the western boundary to reduce impact on the AONB;**

Plots H14 and H21 may be too close to the western boundary to allow a sufficient landscape buffer to the AONB beyond.

- iv. **Development proposals are sensitively designed in terms of height and massing in order to ensure the development does not have an adverse impact on the AONB and countryside;**

The Council considers both the height and massing of the proposed site layout to be of great concern. The housing mix does not reflect the street scene of Capel-le-Ferne in terms of single storey buildings. The height issue of the 4 bedroom properties would appear less obvious if they were dispersed around the site rather than grouped at the front.

The positioning of the blocks of flats, together with plots H14 and H21 just aggravates the massing issue, giving an overcrowded feel to the site.

A reduction in the density of build on the site would not only give it a more rural feel, but also allow the parking arrangements to be reconsidered. The inclusion of 41 properties in the proposed site layout also exceeds the estimated capacity of 40 dwellings.

One of the greatest concerns with this development is the impact of increased traffic flow in Capel Street (indicated to be around 23%). A reduction in build density would reduce this impact. Traffic congestion increases significantly in this area at the start and end of the school day.

- v. **Footway connections are provided within the site and new footway provision is facilitated on KCC highway land on the eastern side of Capel Street to provide pedestrian connectivity to the Primary School and beyond;**

See response in viii below

- vi. **A financial contribution is secured to mitigate the impact on the Thanet Coast and Sandwich Bay SPA;**

No comment.

- vii. **Development should provide a connection to the sewerage system at the nearest point of adequate capacity and ensure future access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes;**

Residents have express great concern about localised flooding in the area during persistent or heavy rain. This must be fully investigated and any remedial measures proposed, need to be incorporated into the design stage of any such development. It is critical that all surface water is contained on the site. Kent County Council are aware of flooding in this area and have visited on numerous occasions, as can be evidenced on their website system for reporting faults.

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There are also areas surrounding Capel Street that currently suffer from severely reduced water pressure at peak times. This should also be investigated, as any development is likely to have an adverse impact to our residents' water supply in this area.

viii If street lighting is required this should be designed to minimise the impact of light pollution and conserve the dark night skies of the AONB;

As the new footway on the site providing pedestrian connectivity between the Primary School and the lower part of Capel Street will be behind the hedgerow for some of its length, it is important that adequate lighting is provided to prevent crime and anti-social behaviour.

ix. Vehicular access is achieved onto Capel Street which is designed to minimise the loss of the existing hedgerow.

It is suggested that access to the proposed property H01, should be by the rear as similar to the other frontage properties. This will look more in keeping with the development and allow the gap in the hedgerow at this end of the site to be planted.

Although the Principle Planner at Dover District Council has indicated that a vehicular access 'located roughly centrally along the frontage' would be preferable, this location would lead to a significant length of the hedgerow having to be removed.

Protected Species

The Council believe that appropriate Ecology Protected Species surveys and assessments are instructed and considered carefully and not detrimental to the current wildlife (bats, dormice, birds etc.) connected to the site.

It is believed that the hedgerows around this site are "bat foraging corridors", which may be protected by Legislation. This must be clarified before any planning permission is granted.

Conclusion

It is accepted by the Parish Council and our Parishioners, that this site was adopted into the Land Allocations Plan following scrutiny by the Government Inspector. However, we request that our parishioner's comments and views be taken into account when deciding on planning submissions in our beautiful village.

The Parish Council request that this application be called into Dover District Council Planning Committee.

Yours sincerely



Maureen Leppard
Clerk
Capel-le-Ferne Parish Council