CAPEL-LE-FERNE PARISH COUNCIL

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20 December 2010

Dover District Council
Forward Planning Section
White Cliffs Business Park
Dover
Kent
CT16 3PJ

Dear Sir / Madam

Site Allocations Document - Interim Consultation

Capel-le-Ferne Parish Council acknowledge receipt of your letter dated 27th October 2010 title "Dover District Local Development Framework" and respond as follows:-

You require our initial views and comments on the Coastal Change Management Areas, the sites identified within the Site Allocation Document which incorporate a number of new sites landowners within the Parish have now put forward to Dover District Council for your consideration.

We have followed the layout of your Interim Consultation for your ease of reference.

Key Ouestion 1 Coastal Change Management Areas

We have no specific comments to add in relation to the extent of the Coastal Change Management Areas and the proposed planning approach to development proposals appear to be prudent and reasonable.

Key Question 2

Please find below our comments on the infrastructure and merits of each site for your pursue when considering each site.

BOX 1 SAD01 - Land to the north of New Dover Road, Capel-le-Ferne

Not acceptable for development

You indicate that a proposed development of 215 dwellings will be considered. The scale of any proposed development on this land will be significantly contested by the Parish Council and its Parish.

This site is totally out of proportion with the existing size and settlement of the village and will significantly alter the character and have a serious detrimental impact on the Parish which is totally unacceptable. This is supported by your documentation (2.5 Section 4) as it is evident that this proposed area would represent over 27% of all the dwellings currently within the Parish. The resulting increase in traffic circulation would create more danger on the B2011 through the centre of the village.

We would also bring to your attention this area has significant Public Rights of Way and has a significant drainage pipeline known as Folkestone Transfer which collects effluent from Folkestone and is transferred to Southern Water's Broomfield Bank Wastewater Treatment Works, which both run across the middle of this site.

Capel-le-Ferne does not have the appropriate infrastructure to support such a development. For example the local Primary School is already at capacity and unlikely to be able to support the additional education requirements that would be required. This would increase traffic circulation to schools outside the village and new residents will therefore not integrate with the existing village.

The close knit community feel of the village would never be the same again and would alter one of the main reasons for settlement within the Parish in the first place.

<u>BOX 2 CAP02M</u> – Former Petrol Station site on land to West of 185 New Dover Road, Capel-le-Ferne We have no objections to this site in principle. We believe this would be an ideal site for a small number of commercial units and in particular a Doctors Surgery with adjoining Post Office which will support the amenities currently available within the village. This also would be consistent with your CP1 Core Strategy Policy if Capel is identified as a Local Centre.

BOX 3 SAD02 - Land to the North of the New Dover Road, Capel-le-Ferne

We have no objections to this site in principle subject to appropriate investigation of the current wildlife habitat. This site has good access from the B2011.

BOX 4 SHL047 - Old Dover Road Site, Capel-le-Ferne. Not acceptable for development

We refer to your previous assessment of CAP04 Site which after careful consideration was rejected by Dover District Council. We believe the same reasons are evident and valid to this location. Any development would have a detrimental impact on the Heritage Coast and A.O.N.B.

BOX 5 SHL060 – Land between 107 & 127 Capel Street, Capel-le-Ferne

We have no objections to this site in principle as this would connect the bottom end of the village, but disagree with your indication of 48 houses on this site which is excessive. This would be an opportunity to improve the highway conditions within the vicinity around the village school. We believe conditions could be imposed for a drop off lay-by for the school, appropriate footpaths and traffic movements onto Capel Street would need to be considered carefully. We also believe this area would be an ideal opportunity for social housing which should be connected to families or residents of Capel-le-Ferne.

BOX 6 SHL 084 - 38 Cauldham Lane, Capel-le-Ferne

We have no objections to this site in principle, but would suggest if SHL060 is not suitable, this could also be an ideal opportunity for social housing which should be connected to families or residents of Capel-le-Ferne.

BOX 7 SHL 085 - Longships, 9 Cauldham Lane, Capel-le-Ferne

We have no objections to this site in principle, but would comment to Dover District Council previous approval of LDF014 (the adjacent site). We have concerns over the road width, passing locations, traffic movements and congestion at Capel Street and B2011.

We would also like to draw your attention that site <u>LDF 014</u> has an asbestos building and a number of horses buried on the site.

BOX 8 SHL 091 - Land at Little Cauldham Lane, Capel-le-Ferne. Not acceptable for development

You indicate that a proposed development of 186 dwellings will be considered. The scale of any proposed development on this land will be significantly contested by the Parish Council and its Parish.

This site is totally out of proportion with the existing size and settlement of the village and will significantly alter the character and have a serious detrimental impact of the Parish which is totally unacceptable. This is supported by your documentation (2.5 Section 4) as it is evident that this proposed area would represent over 23.5% of all the dwellings currently within the Parish.

This site is also not supported due to the serious infrastructure issues which exist and it is evident that no acceptable access to this site is practicable. Access from Cauldham Lane is totally in appropriate which is clear for all to see both in terms of road width and footpath provisions. Access from Capel Street is not provided. Capel Street currently has issues with speeding and congestion, further bottlenecking at the junction of Capel Street / B2011 will be significant and extremely dangerous. The infrastructure is totally inappropriate.

This area has a flooding issue and even though the current area is agricultural, discharge and run off can be significant into Capel Street during heavy rain. As you will be aware this has caused flooding of properties in Capel Street over the past few years. This land needs to remain in its current form.

Capel-le Ferne does not have the appropriate infrastructure to support such a development. For example the local Primary School is already at capacity and unlikely to be able to support the additional education requirements that would be required. This would increase traffic circulation to schools outside the village and new residents will therefore not integrate with the existing village.

This site is also a flight path and stop off for birds such as swifts, swallows and other migrating birds.

The close knit community feel of the village would never be the same again and would alter one of the main reasons for settlement within the Parish in the first place.

<u>BOX 9 NS01CAP</u> – Intersection of Old Dover Road and New Dover Road, Capel-le-Ferne Not acceptable for development. Any development of this land would have a detrimental impact on the AONB and the Heritage Coast.

Key Question 3

In relation to what level of development do we think is appropriate for each settlement to 2026, we comment as follows:-

As identified within Box 2 above, we believe the settlement would significantly benefit from a Doctors Surgery with adjoining Post Office and we have identified a site for consideration.

Key Question 4

We confirm you have identified the range of facilities and services that are available in our settlement.

Upon receipt of the Site Allocation Documents received from Dover District Council, the Parish Council have informed the residents through our local monthly newsletter known as the "Grapevine" of the Interim Consultation and we have held open forums and displays at the local Farmers Market to spread the word and engage the whole village. This of course does take considerable time to organise and we feel this could have been advertised to a much greater extent or have extended the consultation period to ensure you receive all appropriate views and comments which should be the basis for your consideration of the above mentioned sites.

We hope the above is helpful to Dover District Council and look forward to further correspondence in due course.

Yours faithfully

Maureen Leppard Clerk Capel-le-Ferne Parish Council