

CAPEL-LE-FERNE PARISH COUNCIL

Clerk to the Council
Maureen Leppard



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14 February 2022

For the attention of Miss Rachel Morgan, Case Officer
Planning Department
Dover District Council
Whitecliffs Business Park
Dover, Kent
CT16 3PG

Re: **22/00043**

Proposal: Reserved matters application for approval of landscaping, layout, scale and appearance pursuant to outline application DOV/19/00669 for of 34 dwellings

Location: Land Between Nos 107 And 127, Capel Street, Capel Le Ferne.

Dear Miss Morgan

Capel-le-Ferne Parish Council remain opposed to the proposed development on this site for the following key reasons.

- **The increased traffic and pollution on Capel Street**
- **The increased risk of flooding in the area**
- **The destruction of a greenfield site together with the habitat of its flora and fauna**

Traffic and other issues related to Capel Street and the proposed development.

In our view, one of the main concerns with this planning application still revolve around the traffic impact on Capel Street in relation to:

- Congestion and increased pollution at school times
- Lack of consideration of head teachers letter at the Outline Planning stage
- The general increase in traffic movement, up to 25% increase across the day
- The impact of traffic at the junction of Capel Street and New Dover Road
- The congestion around the narrow access to the site, particularly by larger delivery vehicles, refuse trucks, etc.
- Concerns about the lack of lighting near the public footpath fronting the site and the number of driveways accessing directly onto Capel Street. (*George Close, the other recent development in Capel was designed so all driveways connect to the access road and not the main thoroughfare*).
- Concerns relating to the planning of the field and road drainage. Considering there are no road drains along the edge of the field and that the main drain, down the centre of the road, was installed before most of the local properties were built. A large estate would overwhelm the existing drainage system. In addition, the only drain from the field goes into a pond.

Continued ...

- We note that the proposal includes a SUD scheme, to include 4 borehole soakaways with appropriate storage tanks. Close examination of this scheme will need to be carried out prior to satisfy the release of condition 10.
- Hobbs Parker state, within their Report, that Capel Street is a 20 mph zone. Whilst on paper Capel Street is a 20mph zone, recent Traffic Surveys and Capel Speedwatch results affirm that few drivers take any notice of this. Hence, Capel Street remains dangerous to pedestrians, mobility scooters, horse riders and cyclists. Again, these critical points have not been addressed by Dover District Council. Capel Street is currently over-congested and narrow. The site is far too close to the school and all that that involves. It follows that current Capel Street infrastructure is insufficient to cope with the present situation.
- The designs of the proposed new houses are completely out of keeping with current properties situated in Capel-le-Ferne
- There is absolutely no evidence whatsoever from the plans that there will be adequate parking facilities for the proposed houses. Policy DM13 relates to parking provision where, obviously, only the minimum allowance will be made to keep costs down. The proposal might satisfy this policy but will result in inadequate parking for the number of people residing on the new estate and their visitors. It is an immutable fact that in general terms new developments are guilty of this. Thus, overflow parking, as so often seen in situations like this, will result in vehicles from the site, should it be developed, parking in the already narrow Capel Street, regularly used by large farm vehicles, large tractors and trailers, large delivery lorries, emergency vehicles, etc. The purpose of Capel Street is not to be an overflow carpark for this proposed development. (Policy LA 26 states : *the design and layout should incorporate frontage development with adequate parking arrangements*). Will Dover District Council be guaranteeing in writing that a sufficiency of double yellow lines will be in place on Capel Street itself, in those places requested by local residents, prior to the development being completed?

The Increased risk of flooding in the area.

Hobbs Parker dismiss, within their Report, any risk of flooding. Where is the evidence for this?

Residents in the near vicinity to the proposed site have long suffered periodic flooding.

It is fact that: rainwater runs off the field of the proposed development site, which naturally slopes towards Capel Street; current drainage in place for existing properties is inadequate to deal with heavy rainfall and leads to a backwash from the Alkham Valley direction and the upper part of Capel Street, resulting in flooding in the area.

The proposed development of 34 houses on this site will only exacerbate this problem;

- Where are the original Drainage Survey Reports actioned over the years that planning permission was being sought?
- Have they been lost in the archives?
- The Drainage Assessment may be acceptable for the development site but what about the existing structures that this will connect to in Capel Street?
- These already have problems coping with the housing that already are using it which has increased over the years since the original drains were installed.
- A full and comprehensive Drainage Survey needs to be actioned prior to any further progress with this application.
- . Close examination of this scheme will need to be carried out prior to satisfy the release of condition 9.

(Condition 9 No development shall take place until the details required by Condition 1 (assumed to be reserved matters condition for layout) shall demonstrate that requirements for surface water drainage for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm can be accommodated within the proposed development layout. Reason: To ensure the development is served by satisfactory arrangements for the disposal of surface water and that they are incorporated into the proposed layouts.)

The destruction of a Greenfield Site together with its Flora and Fauna.

Whilst Capel Parish Council appreciate the need for new housing within Dover District, the Council does not consider this site appropriate in this part of Capel.

Whilst this planning application has not achieved compliance with Policy LA26 with regards to : *Vehicular access is achieved onto Capel Street which is designed to minimise the loss of the existing hedgerow.* The Parish Council note from the ECOLOGICAL MITIGATION AND MANAGEMENT PLAN :

Trees and Hedgerows,

Retain where possible, protect from harm as necessary during construction and replace lost specimens with native species of local provenance

Bats,

Retain boundary vegetation where possible and incorporate sensitive lighting strategy

The Parish Council would expect compliance with Policy LA 26 with regards to:

The existing boundary hedgerows and vegetation to the west are retained, and also, a landscape buffer is provided along the western boundary to reduce impact on the AONB

Other Issues concerning the Parish Council

- We do not agree with the idea of grouping affordable housing in one part of the site.
- Many of the refuse store bins for the proposals appear to be located at the bottom of each units garden which appears very impractical.
- We are concerned that the important subject of an Archaeological Survey has been ignored. Capel Street is an historic area and it follows that such a Survey should be put in place immediately and these plans put on hold pending the availability of the Survey Report.

Our residents are extremely disappointed and feel let down that Councillors, who made the decision to permit Outline Planning Permission for this proposed development, would not even make a site visit to assess many of the points this Parish Council put forward based upon their knowledge of the site and the surrounding vicinity. Many of our residents are perplexed and respectfully request the planning committee attend site prior to making a decision on this application.

Yours sincerely



Maureen Leppard

Clerk

Capel-le-Ferne Parish Council