

CAPEL-LE-FERNE PARISH COUNCIL

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Capel-le-Ferne

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Local Plans Team
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Dear Local Plans Team

Capel le Ferne Parish Council would like to thank Dover District Council for the hard work and effort in pulling together the Local Plan to 2040 and comment specifically on the Regulation 19 Submission for our village.

We consider the plan to be **unsound** and cannot be **justified** based upon the following: -

- 3 of the 4 sites allocated in the plan CAP006, CAP009(Decided) and CAP013 have very poor infrastructure
- Capel Le Ferne is defined as a large village in the Plan, yet the allocation housing sites by settlement as identified within the Strategic Policies (table 3.3) allocates 95 dwellings, some 279% increase to Capel Le Ferne compared with the average of the other 5 villages in the district which has an average of 34 as can be seen in table 1.
- In relation to Local Centres which has a separate definition, DDC strategy for the rural area, it is proposing to grow the adjacent villages of Eythorne & Elvington by 355 to create a new Local Centre. Excluding this Local Centre, Capel le Ferne's allocation of 95 is some 113% compared to the average of the 5 Local Centres identified in the Plan. The average in the district is 84 and Capel is a village not a Local Centre as can be seen on table 2.

Large Village	
Lydden	30
Preston	65
Worth	25
Alkham	10
East Langdon	40
Average	34
Capel Le Ferne	95
Capel v Average	279%
Table 1	

Local Centres	
Eastry	95
Wingham	103
Shepherdswell	70
Eythorne & Elvington	355
St Margarets	96
Kingsdown	55
Average	84
Capel Le Ferne	95
Capel v Average	113%
Table 2	

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- When looking at the 4 sites proposed the increase would amount to circa 20% increase compared to that North of New Dover Road as identified table 3 and 4.



Sustainability

In the Sustainability Appraisal, **SA 10** state: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the district's historic environment

SA 11 states: To conserve and enhance the special qualities, accessibility, local character and distinctive character and distinctiveness of the district's settlements, coastline and countryside.

Capel is a unique settlement within Dover District, located over 500ft above sea level with the Heritage Coast to the South and AONB to the North, East and West of the settlement

Sites CAP006, CAP011 and CAP013 will all have a significant negative impact on both **SA 10** and **SA 11**.

CAP006 Land to the east of Great Cauldham Farm, Capel-le-Ferne CT18 7LZ**Number of units: - 70**

In the Local Plan Capel has been designated as a Large Village. However, Capel Parish Council are extremely concerned that Dover District Council still appear to be treating Capel as a Local Centre with an indicative number of dwellings set at 85 plus 15 (originally 10) for Longships, where planning permission has already been granted. The figure of 100 dwellings appears disproportionate when compared with the number of dwellings proposed in other Large Villages and Local Centres in this Local Plan and will have a major impact on the AONB that borders these sites.

The Parish Council considers that CAP006 has high-level constraints because of its prominent position and do not support this site for development as it does not sit well with Policy NE2.

The site is outside the settlement of Capel-Le-Ferne, the impact of any development here would be detrimental to the setting of the AONB which borders the site to the Northwest and the wildlife-rich habitat of the area. Development on this scale is also considered inappropriate in this location given the size of the existing settlement.

The access points proposed are from Capel Street and Cauldham Lane, both providing completely inadequate highway infrastructure, for example Cauldham Lane is single track with no passing places and Capel Street, although two-way, has a very restrictive traffic flow due to parked vehicles on one side of the road making it in essence a single lane. This is because many houses towards the New Dover Road end of Capel Street are built on higher ground with no off-street parking. KCC have concerns over whether a secondary emergency access onto Cauldham Lane is achievable.

The Cauldham Lane access point is of significant concern as it is a single-track lane. The lane is often blocked by delivery vehicles and is regularly used by heavy vehicles accessing the local farm and the industrial units further down the lane.

Consideration must be given to the increased volume of traffic resulting from this and other sites put forward in the new Local Plan (CAP 009 (Decided) & CAP013), together with a further 34 houses likely to be built in the near future at the lower end of Capel Street (CAP010 from the 2015 Local Plan). These sites could amount to 134 new dwellings that would need to access Capel Street. Currently there are approximately 170 dwellings fronting Capel Street. Therefore, the new and current Local Plans are likely to generate a substantial increase in traffic using Capel Street, which is totally unacceptable as the street cannot accommodate this increase due to the inadequate highways infrastructure as mentioned above.

This additional traffic would impact heavily on the New Dover Road/ Capel Street/Cauldham Lane's junction. This is already a dangerous junction and would be completely inadequate for the increase volume of traffic being proposed. DDC have previously raised concerns about this difficult junction. Historically there have been a number of road traffic collisions exacerbated by the blind entrance / exit to the B2011 often in foggy times. The poor visibility often experienced in Capel is due to its geological situation which is in excess of 500ft above sea level.

Capel Street is the main access route to the local Primary school so will add even further pressure at certain times of the day. The Parish Council are of the opinion that no further development should take place in this part of Capel because of the unconventional layout of the Capel Street/Cauldham Lane/New Dover Road junction, which would be impracticable to change along with parked cars and passing points in Capel Street as stated above.

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Although Capel-le-Ferne is designated as a **Large Village**, it has little in the way of facilities and services. There is no post office, no health care facilities, no doctor, no dentist and no pubs within the village boundaries. **It only has one shop, a primary school and a through bus service to Dover, Folkestone and beyond.** This site does not conform with your Strategic Policy 3 – Housing growth, specifically identifies new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services, supporting regeneration and wherever possible make the best use of brownfield land. We see little evidence of this.

Many residents of Capel use Health Service facilities in Folkestone which are not directly accessible by bus, therefore, in order to access these services, residents tend to drive to Folkestone which is clearly at odds with **SP1.Planning for Climate Change. Item f**, which mentions reducing the need to travel.

It is also worth mentioning that because of Capel's geological position, it is unlikely that residents would walk or cycle to use facilities in the nearest towns.

This plot is a high class agricultural green field site that has been cropped for many years. The Parish Council object to the loss of valuable arable land and believe that the development of this site would be contrary the National Planning Policy Framework.

CAP011 Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne CT18 7JD

Number of units: - 10

This site sits within the AONB and was previously a petrol filling station, buried tanks and site contamination may still exist. There is existing access on the site so there are no access concerns. However, the Parish Council would like to remind DDC that the site was previously rejected as it was divorced from the main settlement and would have a detrimental impact on the surrounding AONB.

Whilst development may be acceptable on 'Previously Developed Land', a considerable portion of the site would need to be used to provide a generous landscape buffer from the AONB to the North and West of the site.

However, if this site were to be taken forward, the Parish Council believe that if a generous landscape buffer is put in place between development and the AONB, they would support sympathetic ribbon development on this site.

CAP013 Land at Cauldham Lane, Capel-le-Ferne CT18 7HG

Number of units: - 5

This site is on the edge of Capel, outside of the definite settlement boundary and detached from the village.

The site is in a prominent position on high ground overlooking the adjacent AONB and bridle path. It would need significant screening to mitigate its impact on the AONB and Bridleway.

Any development on this site would have a major negative impact when viewed looking north-east from the bridle path and beyond.

The only access to this site is via Cauldham Lane, the lane is single-track and is regularly blocked by delivery vehicles. It is also used by heavy vehicles accessing the local farm and the industrial units further down the lane.

Cauldham Lane is also used by many of our parishioners including dog walkers, ramblers, school children, elderly residents, families and horse riders accessing the bridle path. Any increase in traffic would have wider health, safety & social impact to this part of the village.

This site will also impact on the dangerous Cauldham Lane/Capel Street/New Dover Road junction. The Parish Council believe that such development is inappropriate in this area and the site does not sit well with Policy NE2 or the National Planning Policy Framework, therefore, is not supported by the Parish Council. For the reasons given above, Capel Parish Council request this site is excluded from the Local Plan.

Capel Le Ferne Parish Council and our Parishioners have raised the above concerns and are extremely worried about the proposed local plan and the impact this would leave on our village.

Yours sincerely

Maureen Leppard
Clerk
Capel-le-Ferne Parish Council