



Deal Town Council, Town Hall, High Street, Deal, Kent CT14 6TR,

Tel: 07887491569 E-mail: deal.town.council@deal.gov.uk

www.deal.gov.uk

To all Councillors:

You are hereby summoned to attend an Extra Ordinary meeting of Full Council via Microsoft Teams on Wednesday 10th March 2021 at 7.15pm to transact the business shown on the agenda below.

To the press and public:

Any member of the public may submit a written statement of no more than 500 words relating to any item on this agenda. These must be received by 10am on Tuesday 9th March by the Communications Officer Joanne Harper via the contact details above.

To listen to this meeting please contact the Communications Officer Joanne Harper, via the contact details above before 12 noon on Wednesday 10th March 2021.

Paul Bone – Deputy Town Clerk

Date: 4.3.2021

AGENDA

1	Chairman's opening remarks and apologies for absence:	Chairman
2	Declarations of interest: To receive any declarations of interest from Members in respect of business to be transacted on the agenda.	Attach. 1
3	The minutes of the full Council meeting held on 23 rd February 2021 for approval: Decision required	Attach. 2
4	Statements received from members of the public on items relating to the agenda to be read out by the Deputy Town Clerk (maximum 15 minutes): For councillor information	Town Clerk
5	Dover District Local Plan report: Decisions required	Attach. 3
	Date of next Full Council meeting: 30 March 2021	

Disclosable Pecuniary Interest (DPI)

Where a Member has a new or registered DPI in a matter under consideration they must disclose that they have an interest and, unless the Monitoring Officer has agreed in advance that the DPI is a 'Sensitive Interest', explain the nature of that interest at the meeting. The Member must withdraw from the meeting at the commencement of the consideration of any matter in which they have declared a DPI and must not participate in any discussion of, or vote taken on, the matter unless they have been granted a dispensation permitting them to do so. If during the consideration of any item a Member becomes aware that they have a DPI in the matter they should declare the interest immediately and, subject to any dispensations, withdraw from the meeting.

Other Significant Interest (OSI)

Where a Member is declaring an OSI they must also disclose the interest and explain the nature of the interest at the meeting. The Member must withdraw from the meeting at the commencement of the consideration of any matter in which they have declared a OSI and must not participate in any discussion of, or vote taken on, the matter unless they have been granted a dispensation to do so or the meeting is one at which members of the public are permitted to speak for the purpose of making representations, answering questions or giving evidence relating to the matter. In the latter case, the Member may only participate on the same basis as a member of the public and cannot participate in any discussion of, or vote taken on, the matter and must withdraw from the meeting in accordance with the Council's procedure rules.

Voluntary Announcement of Other Interests (VAOI)

Where a Member does not have either a DPI or OSI but is of the opinion that for transparency reasons alone s/he should make an announcement in respect of a matter under consideration, they can make a VAOI. A Member declaring a VAOI may still remain at the meeting and vote on the matter under consideration.

Note to the Code:

Situations in which a Member may wish to make a VAOI include membership of outside bodies that have made representations on agenda items; where a Member knows a person involved, but does not have a close association with that person; or where an item would affect the well-being of a Member, relative, close associate, employer, etc. but not his/her financial position. It should be emphasised that an effect on the financial position of a Member, relative, close associate, employer, etc OR an application made by a Member, relative, close associate, employer, etc would both probably constitute either an OSI or in some cases a DPI.

Deal Town Council
Town Hall, High Street, Deal, Kent. CT14 6TR.
Tel: 01304 361999 E-mail: deal.town.council@deal.gov.uk

The minutes of the Full Council meeting
held on Tuesday 23rd February 2021 starting at 7.15pm

Present:

Cllr E Rowbotham – Chairman
 Cllr A Stroud
 Cllr T Bond
 Cllr S Carlyle
 Cllr M Eddy
 Cllr O Richardson
 Cllr B Bano

Cllr D Cronk - Vice Chairman
 Cllr S Beer
 Cllr C Turner
 Cllr L Kettlewell
 Cllr T Thompson
 Cllr C Oliver

Officers:

Town Clerk: Lorna Crow
 Deputy Town Clerk: Paul Bone
 Mayor's secretary: Una Finch

Others: 0 members of the public
 Communications Officer: Joanne Harper

1.	Chairman's opening remarks and apologises for absence: The Chairman welcomed everyone to the meeting and advised of the procedures. Apologises were received from Cllr Friend and Cllr Farrington	Actions
2.	Declarations of interest: Cllr Rowbotham declared a VAOI on agenda item 6 as she is Chairman of SYDD.	
3.	The minutes of the Full Council meeting held on 26 January 2021 for approval: Members RESOLVED: To accept the minutes of the Full Council meeting held on the 26 January 2021 as a true and accurate record. (P) DC (S) LK 12 for 1 abstention motion carried.	
4.	Statements received from members of the public on items relating to the agenda to be read out by the Town Clerk: No statements had been received.	
5.	<p>Dover District Local Plan report: Members RESOLVED: The Deal Town Council notes the importance in setting the District Local Plan and consulting with local residents.</p> <p>During the Covid -19 pandemic it is recognised that there are limits in conducting a major consultation with local community venues not being available and that public gatherings to present to neighbourhood areas are impossible under lockdown conditions.</p> <p>Therefore the time limit set for organisations and parish councils to respond should be extended and the deadline shifted in conjunction with the Government Road Map dates, to enable wider sections of the local population to hear the presentations from the planning authority in order to register their views.</p> <p>As not all people will be able to access online publications and presentations the likelihood is this is an unbalanced consultation with land consigned to development that will encroach on people's lives. Therefore, it is crucial to seek views outside of council representation from voices within communities that better inform the process of planning, development, and regeneration and job creation within the Dover District.</p> <p>(P) SC (S) LK 10 for 3 abstentions motion carried.</p>	

	Members RESOLVED: to defer discussions on the District Local Plan to the extraordinary meeting for Full council to be held on 10 th March to agree the final version to be submitted to DDC and for all contributions to be submitted to the Town Clerk for the agenda by 3rd March. (P) SB (S) LK All agreed.	Town Clerk Committee- Clerk Cllrs
6.	Finance: The Chairman left the meeting, the Vice Chairman took the Chair. (a) Recommendation from the Finance and General Purposes committee: Members RESOLVED: that the £1000 balance remaining in the Youth Budget is also donated to the Youth Hub towards the laptop library project (P) SC (S) SB All agreed. The Chairman returned to the meeting (b) List of payments made between 1 December 2020 to 31 December 2020 including list of payments exceeding £500. Members RESOLVED: to note the list of payments made between 1 December to 31 December 2020 including list of payments exceeding £500 (P) SB (S) DC All agreed.	R.F.O.
7.	Recommendation from Cllr L Kettlewell on proposed reform of mayoral elections: Following discussions Members RESOLVED: For the Town Clerk in conjunction with Cllrs Rowbotham, Kettlewell, Cronk to investigate and explore the constitutional aspects as well as the logistics and practicalities of splitting the Mayor, Deputy Mayor, Chairman and Vice-Chairman positions and roles in future elections. The intention is to make it possible for four different councillors to occupy these four positions. However, it should be clearly understood that this change does not prohibit one individual councillor being able to be nominated for both Mayor and Chairman and also one individual councillor for Deputy Mayor and Vice Chairman. It will then be for the councillor electorate to settle the election in the normal way. The purpose is to allow a councillor to be Chairman or Deputy Chairman of Deal Town Council without automatically assuming the roles of Mayor or Deputy Mayor. Dependant on work load the report will come back to Full Council in time to facilitate the different election system for the forthcoming council year i.e., May 2021. (P) LK (S) SB 8 for 5 against motion carried.	Town Clerk Cllrs: Rowbotham Cronk Kettlewell
8.	Recommendation from the Staff Liaison Panel: Members RESOLVED: To approve the changes to the first section of policies and the Staff Liaison Panel draft for Councillor and Staff Relationship Protocol. Cllr Kettlewell requested his views on discussing policies that do not relate to the staff are not discussed at the meetings be recorded for the minutes. (P) SB (S) OR All agreed	Town Clerk
9.	Recommendation from the Environment Committee: (a) Committee Recommendations: Members RESOLVED: Report noted. (b) Report on aligning DTC's business operations with Deal Town Council's environmental commitments: Following discussion Members RESOLVED: to accept the additions to the Terms and Conditions of Hire of the Town Hall (P) CO (S) ME All agreed. Cllr Bano left the meeting 9pm	Events Manager
10.	Report on LGA Carbon emissions Accounting Tool: Members RESOLVED: A) Accept recommendations 1) and 2) in the RFO's LGA's Accounting Tool Report - Attachment 10. 1) That the R.F.O. produces a simple form regarding staff travel to and from work and requests staff to complete the form on a voluntary basis to provide more accurate data within the report 2) During April the R.F.O. completes the data within the LGA tool with 2020-2021 data , plus going back as many years as we have data for to show a direct comparison B) Reject Recommendation 3) (i.e. not to hire consultants nor delegate authority	R.F.O. R.F.O.

	to the RFO to produce a final Specification.) C) Investigate the methods and associated costs of carbon offsetting and provide options ensuring best value for money for a future decision D) Reallocate the £5000 originally earmarked for the possible hiring of consultants instead towards carbon offsetting costs or other carbon zero initiatives. (P) LK (S) TB All agreed. 8 for 3 against	Town Clerk R.F.O. Project Officer R.F.O.
11.	Recommendations from Cllr Eddy ref Walmer Parish Council: Following discussions Members RESOLVED: to remit each recommendation to the relevant committees for consideration with a more detailed study on project funding. (P) SB (S) TB All agreed. Proposal to extend Standing Orders (P) ME (S) CO 5 for 7 against motion falls The Chairman closed the meeting at 10.15pm	Cllr Eddy
	The following agenda items were deferred to the next Full Council to be held on Tuesday 30 March.	
12.	Saturday Market Report:	
13.	Recommendations from Cllr Eddy on the Triangular Open Space at Freemans Way:	
14.	Annual Report 2020-21	
15.	Deal Town Council Covid Officer Report:	
16.	Correspondence update:	
17.	Committee Reports: (a) The minutes of the Planning Committee meeting held on 7 December 2020 and 7 December 2020 (b) The minutes of the Transport & Infrastructure Committee meeting held on 16 December 2020 (c) The minutes of the Finance & General Purposes Committee meeting held on 9 December 2020 (d) The minutes of the Environment Committee meeting held on 16 November 2020 (e) The minutes of the Environment Committee meeting held on 25 January 2020 The chairman closed the meeting 10:15pm	
	Date of next meeting – Tuesday 30 March 2021	

**DEAL TOWN COUNCIL
MEMORANDUM**

Attach 3

To: Cllr E Rowbotham, Chairman of Deal Town Council
All committee members
From: Mr P Bone – Deputy Town Clerk
Date: 4 March 2021
Subject: Dover District Local Plan

The Dover District Local Plan is published for consultation from 20 January to 17 March 2021 and Deal Town Council are one of the statutory consultees.

The District's existing Local Plan consists of the Core Strategy 2010 and the Land Allocations Plan 2015, as well as saved policies from the 2002 Local Plan.

A new Local Plan needs to be produced as the Government has made changes to legislation, policy and guidance since the existing plan was developed.

The Government requires all local authorities to have an up to date local plan in place by December 2023 and new plans can take several years to finalise.

The purpose of the consultation is to ask for views on:

- The key issues that the new Plan should address,
- A draft vision for Dover District in 2040 and the objectives needed to meet that vision,
- The options that have been considered to address the key issues and growth and development needs,
- The draft strategy for meeting growth and development needs over the next 20 years,
- The land identified which is expected to be needed to meet this strategy and draft policies for guiding that development, and
- Draft policies to address climate change, and for protecting and enhancing the natural, built and historic environment of the District.

The aim as stated by DDC is as follows;

Dover District in 2040 will be a place of aspiration, providing outstanding opportunities for sustainable living. Through careful stewardship of its world class landscapes and wealth of historic sites, it will be a destination of choice for people of all ages to make their home, for businesses to invest in and for visitors to explore and experience. Community spirit will be strong amongst the residents of the district, with an increased sense of health and wellbeing.

The distinctive historic environments of the towns of Deal and Sandwich will be protected and enhanced, their economies benefiting from a wide range of local businesses and services as well as investment in culture.

To support opportunities to strengthen the role of Dover, Deal and Sandwich Town Centres through their diversification, enhancement and improvements to the public realm.

Deal is defined as a District Centre in the Settlement Hierarchy. Deal includes Walmer, Sholden and Great Mongeham.

The vision for the Dover Local Plan 2040 is supported by strategic objectives. These follow the main themes within the vision, with the addition of cross-cutting objectives, and are linked to specific chapters within the plan.

All documents for the Plan with the aspects split into categories can be found at www.doverdistrictlocalplan.co.uk

They are;

District Plan Aspect	DTC Committee to review
Environment	Environment
New Homes	Planning
Transport and Infrastructure	Transport and Infrastructure
Employment and the Local Economy	Full Council
Retail and Town Centres	Full Council
Design	Planning
The Natural Environment	Environment
The Historic Environment	Planning

The timetable proposed for the Local Development Scheme as advertised is:

- Consultation on draft Local Plan (Regulation 18) January 2021 – March 2021 (8 Weeks)
- Review and finalise Local Plan: April 2021 – October 2021
- Consultation on proposed submission version of the Local Plan (Regulation 19): November 2021 – December 2021 (minimum 6 weeks)
- Submission of Local Plan: February 2023

To assist with the decision for Deal Town Council's submission for this consultation, their statutory committees were requested to review the categories above that they felt were applicable to their committee (as indicated above) and agree their committee recommendations in order that they could be included.

The Transport & Infrastructure committee, Environment committee and Planning Committee have now all submitted their responses.

To assist members in considering Deal Town Council's submission for this consultation, the recommendations from each of the Committees has been divided up into the separate categories.

Please note: Two of these categories were assigned to Full Council to review at the meeting of February 23rd, however at that meeting a resolution was passed to defer the whole report to this meeting. This means that these two categories as detailed below will need to be debated and agreed at this meeting:

Employment and Economy: 8 Policies to review

<https://www.doverdistrictlocalplan.co.uk/the-local-plan/employment-and-the-local-economy>

The NPPF (2019) states that local authorities should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth; help create the conditions in which businesses can invest, expand and adapt; support a prosperous rural economy; and be flexible enough to accommodate needs not anticipated in the plan.

In 2018 the District provided 42,000 jobs, which is an increase of 1,000 jobs from 2016. This equates to a job density of 0.64 (the ratio of jobs in the working population aged 16-64), which is well below that for the South East and Great Britain as a whole, meaning that there are significantly less jobs than workers living in the District. This highlights the need to improve the attractiveness of the District as a place to locate business.

Retail and Town Centres: 7 Policies to review

<https://www.doverdistrictlocalplan.co.uk/the-local-plan/retail-and-town-centres>

Deal in comparison to Dover is a more compact centre. A traditional high street, which runs north to south through the town and forms the centre's heart. The historic pattern of the centre lends itself to a limited scale of development for expansion, but notwithstanding this it is nonetheless well thought of by local residents. Deal also has a good level of accessibility and an attractive town centre environment.

The centre also thrives from its wide range of independent retailers which contribute significantly to the overall diversity and viability of the town centre's offer.

Deal has a low vacancy rate when compared with the national average. The low rate of vacancy is attributable to the compact nature of the town centre and the blend of national and independent retailers that offer a diverse and attractive retail offer to shoppers.

The centre would benefit from improved connectivity with the seafront to gain additional tourist trade. The long term strategy for the centre needs to focus on proactively and continuously promoting the centre as a family leisure destination and capitalising on its historic heritage.

Recommendation:

In addition to the two sections above, members to consider the attached recommendations from the Transport & Infrastructure committee, Environment committee and Planning Committee and agree the overall response from the Council to each category/chapter of the consultation.

Decision Required:

Members to agree the response from this council to each of the 8 headings

Dover District Local Plan – Regulation 18 Draft

Deal Town Council responses

Section 5: Environment

Strategic Policy 1: Planning for Climate Change

DTC Environment Committee comment: *To accept this policy with the amendment: Ensuring that development is designed to reduce vulnerability to, and provide resilience from, the impacts arising from a changing climate, whilst not increasing greenhouse gas emissions; and to recommend that include explicit reference be made in Strategic Policy 1 to the Climate Emergency that DDC have declared, giving a firm commitment to - rather than 'ambition to' or 'intention of' - delivering a Carbon Neutral district by 2050*

DM Policy 1: Reducing Carbon Emissions

DTC Environment Committee comment: *To require all new homes to be built to achieve net zero carbon. Where it can be demonstrated this cannot be delivered on-site, developers would then be expected to pay into a carbon off-set fund. This fund would be administered by the Council; and, to require new non-residential development to be built to achieve net zero carbon. Where it can be demonstrated this cannot be delivered on-site, developers would then be expected to pay into a carbon off-set fund.*

DM Policy 2: Sustainable Design and Construction

DTC Environment Committee comment: *Members welcome the Sustainable Design and Construction Policy.*

DM Policy 3: Renewable and Low Carbon Energy

DTC Environment Committee comment: *To recommend that DDC map the areas within the Dover District that would be potentially suitable to deliver renewable and low carbon energy schemes.*

DM Policy 4: Sustainable Travel 3

DTC Environment Committee comment: *Members welcome the DM Policy 4 with an addition to D: For all other types of residential, commercial, industrial and retail developments provide one electric car charging point for every 10 parking spaces provided, with cabling infrastructure capable of at least doubling this to meet future need*

DTC Transport & Infrastructure Committee comment: *We welcome the DM Policy 4 with an addition to D: For all other types of residential, commercial, industrial and retail developments provide one electric car charging point for every 10 parking spaces provided, with cabling infrastructure capable of at least doubling this to meet future need. [Drafting Note this comment was put forward by Environment Committee]*

In addition we would like to add the following points:

- *Flexible ticketing arrangements to allow people to travel within East Kent and one combined travel ticket like an Oyster style card which allows and facilitates the transferability from buses to trains and vice versa and thus increased public transport use*
- *Retain high speed train direct high-speed train links to London and to resist the emergence of Thanet Parkway as the high speed rail hub at the expense of Deal on the Dover Walmer Deal Sandwich Ramsgate line.*
- *Encourage greater rail usage between Walmer Deal Sandwich in order to try and reduce number of journeys made by car*
- *Investigation of delivery of electric buses and responsive bus services and seek to improve bus services connecting with railway services and also connecting with Dover, Canterbury, Sandwich and Ramsgate*
- *Explore the possibility of park park and ride scheme (s) to alleviate traffic congestion and improve air quality in Deal*

- *Introduce a Twenty's Plenty traffic calming speed limit in the Deal urban area and ensure that road improvements are combined with focus and encouragement to reduce dependence on car usage*
- *Provide more electric charging points in Deal particularly in the new build housing groups but also in the town centre, sea front etc*
- *Explore the possibility of boat services between Margate, Ramsgate, Deal and Dover so as to encourage tourism.*
- *Ensure bus services that link to the sports and leisure complex at Whitfield from Deal and Walmer and Sandwich*
- *Support for the development of the White Cliffs Community Rail Partnership in order to encourage more train travel, revive our local economy through Green tourism and encourage people to leave their motor vehicles at home.*

Deal Town Council has a good record of local sustainable transport initiatives and we are determined and willing to be a full partner in activity with both DDC and KCC in developing and delivering sustainable travel for the good of people's health and well-being and the environment.

We delivered a Cycle Friendly Deal project and thought out schemes to promote enhance and safeguard the experiences of cyclists and pedestrians in Deal and our surroundings.

Improvements to the Deal station using funds obtained from the Access for All programme putting forward a detailed vision for Deal Rail station as an integrated transport hub.

We have promoted comprehensive Making Walking and Cycling irresistible plan to improve and develop the active and safe travel routes.

Our work on rural connectivity encouraging the development and use of cycle network between Deal and our neighbouring villages.

We will put time and resources into these projects but we would encourage DDC to match this input and work in genuine partnership rather than treating us as an irrelevance or nuisance.

*DM Policy 4 (c) could be strengthened to read: "Be readily accessible by sustainable transport modes through the provision of high-quality, **engineered**, safe and direct walking and cycling routes within the permeable site layout.." This would make clear that cycle ways, for example, should be more than a painted line on the road surface.*

*DM Policy 4 could also be improved by the following final statement: "The Council will safeguard **and enhance** the rights of way network and other cycle and walking routes from developments that would **otherwise** compromise their use."*

DM Policy 5: Water Efficiency

DTC Environment Committee comment: *The Water for Sustainable Growth Study 2017 correctly asserts that as Dover District is one of the most water scarce areas in the UK, it is appropriate to introduce higher standards than Building Regulations. We recommend that grey water recycling and rainwater harvesting systems be a requirement in new developments. If recycled properly, greywater can save approximately 70 litres of potable water per person per day in domestic households. These systems are best installed as a new build project or when undergoing major regenerations to a house. (<https://www.thegreenage.co.uk/tech/rainwater-harvesting/>)*

DM Policy 6: Flood Risk

DTC Environment Committee comment: *We feel that DM policies 6 & 7 must be made much stronger. Consideration ought to be given to the area-wide cumulative impact of existing and planned developments, in addition to the application under consideration.*

DM Policy 7: Surface Water Management

DTC Environment Committee comment: *We feel that DM policies 6 & 7 must be made much stronger. Consideration ought to be given to the area-wide cumulative impact of existing and planned developments, in addition to the application under consideration.*

DM Policy 8: Coastal Change Management Areas

DTC Environment Committee comment: *No response*

DM Policy 9: Tree Planting and Protection

DTC Environment Committee comment: *We consider this policy not to go far enough and that it must be much stronger. To recommend the following additions be made to the Policy;*

b) *"trees should normally be native species, or appropriate sustainable non-native alternatives, appropriate to Kent's expected climatic conditions, sourced in the UK from an appropriate biosecure source" (there is the new "plant healthy" biosecurity sourcing scheme for tree nurseries launched in 2020.)*

c) *"an appropriate contribution could be charged at the KCC Highways prevailing standard rates, currently £250 in verges and £500 in paved areas."*

d) *"...and any dying or dead trees replaced for a 10 year period after completion of the development."*

e) *"...in the interests of amenity, biodiversity and ecosystem services. DDC will set out its own enhanced criteria for making TPOs, to cover biodiversity and ecosystem services as well as amenity value."*

Additional bullet point to be placed here: "DDC to provide appropriate staffing and resources to sustainably and effectively deliver this policy"

h) *suspected typo - replace "(f) and (e)" with "(f) and (g)"*

New planting should not normally be considered as an acceptable means by which to mitigate the felling of mature trees, and mature trees should be retained wherever possible. The carbon sequestration benefits, and other amenity value of mature trees must be protected, whether under a formal Tree Preservation Order or not.

There is a focus in the preamble to the policy on trees to be planted and retained within gardens. Council policy should be focussed on public trees as community assets rather than those in private ownership. However, where retaining mature trees on-site requires this to be within a garden of a new development, such trees should then be protected by the making of Tree Preservation Orders.

*There should be a presumption that new development will not normally result in the felling of any mature trees of good quality. In addition to the trees per dwelling and jobs there should be a requirement that new developments be tree-lined – planting for the benefit of future generations, but also shrubs and hedgerows for immediate carbon sequestration and amenity impact. [Hedges sequester carbon both in woody growth above ground and in roots, leaf litter and other soil organic matter at and below ground level. In addition, hedges across slopes capture eroding soil and can increase soil organic carbon for up to 60m uphill.]
(<http://www.hedgeline.org.uk/index.php?news=17#:~:text=Hedges%20sequester%20carbon%20both%20in,for%20up%20to%2060m%20uphill.>)*

Developments where tree planting cannot be provided on-site should not normally be considered.

The provision that where trees cannot be provided on-site 'a contribution can be made towards the Council's Tree Planting Strategy' should be removed. This is unacceptably vague and there is no

published DDC Tree Planting Strategy. A thorough mapping exercise of local tree cover in the District and a comprehensive strategy to increase it should be developed and published.

Section 6: New Homes

Strategic Policy 2: Housing Growth

DTC Planning Committee comment: *The Committee supports this policy*

Strategic Policy 3: Residential Windfall Development

DTC Planning Committee comment: *The Committee supports this policy*

Strategic Policy 4: Whitfield Urban Expansion

DTC Planning Committee comment: *The Committee supports this policy*

Strategic Policy 5: North Aylesham

DTC Planning Committee comment: *The Committee supports this policy*

Strategic Policy 6: South Aylesham

DTC Planning Committee comment: *The Committee supports this policy*

Strategic Policy 7: Eythorne and Elvington Local Centre

DTC Planning Committee comment: *The Committee supports this policy*

Site Allocation Policy 1: Non-Strategic Housing Allocations

DTC Planning Committee comment: *The Committee supports this policy*

Site Allocation Policy 2: Land to the south of Alkham Valley Road / Land to the rear of The Meadows, Alkham

DTC Planning Committee comment: *The Committee supports this policy*

DM Policy 10: Gypsy and Traveller Site Intensification

DTC Planning Committee comment: *The Committee supports this policy*

DM Policy 11: Type and Mix of Housing

DTC Planning Committee comment: *The Committee supports this policy*

DM Policy 12: Affordable Housing

DTC Planning Committee comment: *The Committee supports this policy*

DM Policy 13: Rural Local Needs Housing

DTC Planning Committee comment: *The Committee supports this policy*

DM Policy 14: Gypsy and Traveller Windfall Accommodation

DTC Planning Committee comment: *The Committee supports this policy*

DM Policy 15: Self Build and Custom House Building

DTC Planning Committee comment: *The Committee supports this policy*

DM Policy 16: Residential Extensions and Annexes

DTC Planning Committee comment: *The Committee supports this policy*

DM Policy 17: Houses in Multiple Occupation

DTC Planning Committee comment: *The Committee supports this policy*

Additional comments on this section from DTC Planning Committee:

Planning for new homes

6.18 Provide objectively assessed needs for housing – agree that this is an acceptable position.

6.20 Constraining factors for planning for more than the baseline housing growth – agree with all of them, especially “the capacity of existing infrastructure”.

6.21 Agree completely!

6.24 Agree- preferred option.

Nowhere is there a mention of the council designing and delivering its own house building programme. There must be scope to tackle the housing issue by planning for council building, especially on those suitable sites not favoured by developers. So far too much is left to the “free market” in house building.

The delivery of an effective Infrastructure Delivery Plan is absolutely crucial to achieving appropriate housing growth.

DEA008 and DEAO20 sites at Cross Road fail to take account of the issues related to sewerage and drainage that impact on other areas of the town.

WAL002 would have a very negative impact in the local environment and especially on the Local AONB.

Section 7: Employment and the Local Economy

Strategic Policy 8: Economic Growth

Full Council to comment:

Strategic Policy 9: Employment Allocations

Full Council to comment:

DM Policy 18: New Employment Development

Full Council to comment:

DM Policy 19: Retention of Existing Employment Sites

Full Council to comment:

DM Policy 20: Loss or Re-development of Employment Sites and Premises

Full Council to comment:

DM Policy 21: Home Working

Full Council to comment:

DM Policy 22: Conversion or Re-build of Rural Buildings for Economic Development Purposes

Full Council to comment:

DM Policy 23: New Employment Premises in the Countryside

Full Council to comment:

DM Policy 24: Tourism and Tourist/Visitor Accommodation

Full Council to comment:

DTC Transport & Infrastructure Committee comment: Again much of the stated intentions here are fine in terms of the words on the page.

Three successive National lock downs have really hit Deal hard as the number of visitors has fallen to all time lows. This has had an adverse knock-on effect on the various businesses in the town including restaurants and catering, pubs, our few hotels etc, the theatre, shops and hairdressers.

Has there been any effective measurement of the impact of tourism's contribution to the local economy as suggested in para 7. 76 which refers to increasing the tourism contribution. How do you intend to quantify this impact?

In Paragraph 7. 77 how exactly are we going to swim against the rising tide of AirBnB DIY type visitor accommodation. No new hotels have opened in Deal and in fact we have lost hotel capacity. Is all of this just wishful thinking. How will we incentivise new hotels etc?

The White Cliffs Community Rail Partnership (WCCRP) was established in 2020 and it's disappointing that it's not mentioned in the tourism or the transport sections of the draft Local Plan.

This WCCRP is determined to play an important role in bringing key stakeholders together (including crucially local community groups) identifying and filling gaps, encouraging the use of railways, lobbying for improving services and station facilities. As well as seeking improved integration with other forms of public transport including bus services, and actively encouraging opportunities for cycling and walking . They will also be highlighting the cultural historical and beauty of the local natural environment and potential for visits which will then have positive economic side effect.

Deal and Walmer Castles tend to be overshadowed by the popularity of Dover Castle which is one of the most visited sites in England. More needs to be done to encourage trips to out to Deal and Walmer as the rich cultural and historical heritage of both places is worthy of being more widely appreciated.

Deal Town Council is doing its utmost to try and promote the town's attractiveness as a tourist destination ensuring that the benefits of this are passed on to the local community. But that also means ensuring that our visitors do not leave litter etc cause disruption or congestion. There is a balance to be struck here but one that the town council is happy to play its full part in achieving.

Additional comments from DTC Transport & Infrastructure Committee: Strategic Policy 8: Economic Growth

The statement contained in the strategic policy 8 economic growth box is difficult to argue with as it's anodyne and safe. But-what it is not saying is critical so here are a few additions.

The context of these aims is critical. All economic growth must be balanced by the need to nurture cherish and protect the environment and to tackle the effects of climate change.

We should be pursuing policies that embrace a green approach and taking proper account of the impact of carbon emissions in everything that we do including every bit of economic activity.

We must ensure there is joined up thinking and action rather than expedient headline grabbing measures which are neither sustainable or sufficiently socially or environmentally acceptable.

Attracting lots of jobs is desirable but they need to be well paid high quality jobs. Our local economy has too many low paid jobs and these are being subsidised as many workers are having to claim benefits from the Social Security system. This is the back door subsidy for some businesses are not and is not sustainable or fair.

We need to provide for people in their later years and encourage retirement volunteering and leisure time in order to make employment opportunities for those leaving school and university.

Dover District does have many areas of outstanding natural beauty a lot of history, a developing and varied cultural life and the coastal setting is without doubt a great asset. It is therefore essential that we do what we can to revive local businesses particularly in the tourism sector following the damage caused by the Covid

pandemic and the choking off of demand and economic activity.

All of this will need to be done in the wake of Brexit which is likely to cause some investment funding to leave the UK and businesses to set up inside the European Union. We have yet to see the real implications of the loss of GDP. These impacts will need to be closely monitored. We need to do all of our economic growth activity with an eye on impact on the environment.

There is a real economic challenge if the district declines further in terms of having well paid employment and instead continues to have to rely on the uncertain and often casual nature of jobs in the gig economy. This will exacerbate problems in an area that already suffers poor life expectancy and a general lack of prosperity.

In the meantime the pursuit of a better quality of life by some moving from London etc may well encourage more people to come and retire in Deal putting an additional great strain on the infrastructure and the limitations of our local job market i.e. shortages in key service industries like social care. It is therefore vital that investment in infrastructure needs to be made by central and local government with substantial contributions from the private sector.

We should be working in partnership with the Dover Harbour Board to ensure that it retains its important position as a key transactional gateway to the European Union and beyond.

Chapter 4, paragraphs 4.1 to 4.5 This chapter is very much motherhood and apple pie. There is nothing to disagree with in terms of what the Plan hopes to achieve, but there is little to inspire confidence in the ability of DDC to deliver it through the Local Plan.

*Chapter 9, paragraphs 9.4 to 9.7, 9.13 to 9.16, 9.26 to 9.40, Strategic Policies (SP) 13 and 14, and DM Policy 29 It is not the Council's role to have regard to any planning application's financial viability. It is the responsibility of the applicant to have in place sufficient funding or access to sufficient funding in order to realise the project. It is the Council's responsibility to determine the use of the land and the conditions which make that use appropriate. Paragraph 9.30 should be re-written to signal the Council's intention to implement a CIL before the Plan has run a quarter of its projected course, and a further sentence should be added to SP13 stating that: **"The Council intends to introduce a Community Infrastructure Levy as soon as possible but before 2025 so that the council, developers and residents can more clearly understand the financial requirements of any agreed planning permission."***

In paragraphs 9.31 to 9.34 no consideration is given to the need for improvement highways linkages between the two principal roads entering Dover (the M20 and the A2) elsewhere in Kent, so that, if there is a blockage on one route traffic can be switched to the other thus avoiding build-ups of traffic. Nor is there any effective consideration of alternative transport routes crossing a dualled A2.

SP14, as it title suggests (Strategic Highways Infrastructure) makes no reference to the High Speed rail or to any other rail improvements. Rail is omitted from DM 4 (Sustainable Travel)

*SP14 should be re-titled **"Strategic Transport Infrastructure"**. SP14 contains a sentence which is unclear – "Proportionate developer contributions will be sought from new development for which this mitigation may be necessary". It is unclear what "this mitigation" refers to in the immediately preceding sentence.*

*SP14 would benefit from the addition of the following: **"Proposals which assist in the provision of alternative transport modes across a dualled A2 will be encouraged. The Council will work with Highways England and Kent County Council to improve accessibility elsewhere in Kent between the two principal access routes to the Port of Dover, the M20 and the A2. The Council will work with partners to improve access to the local and High Speed rail network."***

Section 8: Retail and Town Centres

Strategic Policy 10: Quantity and Location of Retail Development

Full Council to comment:

Strategic Policy 11: Dover Town Centre

Full Council to comment:

Strategic Policy 12: Deal and Sandwich Town Centres

Full Council to comment:

DM Policy 25: Primary Shopping Areas

Full Council to comment:

DM Policy 26: Sequential Test and Impact Assessment

Full Council to comment:

DM Policy 27: Local Centres

Full Council to comment:

DM Policy 28: Shop Fronts

Full Council to comment:

Additional comments from DTC Transport & Infrastructure Committee: Strategic Policy 9 Employment Allocations.

A glaring omission from the list of sites in paragraph 75.1 that were allocated for business and employment purposes in our district is that there is nothing in Deal. In stark contrast Sandwich gets three bites of the cherry. Deal is an important town in the district with a population of over 25,000. It is essential that more is done to encourage employment in Deal beyond just tourism and service related industries.

Deal yet again appears to be the forgotten town. The DDC lack of ambition and vision for Deal compare to Sandwich is unacceptable.

Is Deal destined to be a sleepy backwater or will it be encouraged to thrive and be a vibrant centre of economic activity. Are we making the most of our assets?

We need to harness the energy and enthusiasm and talents of our local community.

If as is expected the limited job opportunities in Deal do not expand beyond retail, entertainment, catering, tourism which are all currently under pressure then it is essential that the workforce is able to travel to the centres that have been listed and beyond. This requires better improved public transport links.

Public Transport links to Whitfield and the Discovery Park, Industrial Estate and Ramsgate road site in Sandwich need improving as they are currently an impediment and require car journeys or very long waits for buses – as timetables are not joined up. A bus that links Dover to Ramsgate via Deal but extending beyond Sandwich and via the new Thanet Parkway station would be a really beneficial development.

Additional comments from DTC Planning Committee

This underestimates the social and economic tumult all town centres are facing. I support the need for a Retail and Town Centres Needs Assessment before the adoption of the draft Plan. I fully support the proposed extensions to the Town Centre boundary. I also support not permitting change of use to ground floor retail uses.

I welcome the recognition that the whole of Deal high street lies within a conservation area and that has implications for shop signage.

Section 9: Transport and Infrastructure

Strategic Policy 13: Infrastructure and Developer Contributions

DTC Transport & Infrastructure Committee comment: *It is not the Council's role to have regard to any planning application's financial viability. It is the responsibility of the applicant to have in place sufficient funding or access to sufficient funding in order to realise the project. It is the Council's responsibility to determine the use of the land and the conditions which make that use appropriate. Paragraph 9.30 should be re-written to signal the Council's intention to implement a CIL before the Plan has run a quarter of its projected course, and a further sentence should be added to SP13 stating that: "The Council intends to introduce a Community Infrastructure Levy as soon as possible but before 2025 so that the council, developers and residents can more clearly understand the financial requirements of any agreed planning permission."*

Strategic Policy 14: Strategic Highway Infrastructure

DTC Transport & Infrastructure Committee comment: *In paragraphs 9.31 to 9.34 no consideration is given to the need for improvement highways linkages between the two principal roads entering Dover (the M20 and the A2) elsewhere in Kent, so that, if there is a blockage on one route traffic can be switched to the other thus avoiding build-ups of traffic. Nor is there any effective consideration of alternative transport routes crossing a dualled A2.*

SP14, as its title suggests (Strategic Highways Infrastructure) makes no reference to the High Speed rail or to any other rail improvements. Rail is omitted from DM 4 (Sustainable Travel)

SP14 should be re-titled "Strategic Transport Infrastructure". SP14 contains a sentence which is unclear – "Proportionate developer contributions will be sought from new development for which this mitigation may be necessary". It is unclear what "this mitigation" refers to in the immediately preceding sentence.

SP14 would benefit from the addition of the following: "Proposals which assist in the provision of alternative transport modes across a dualled A2 will be encouraged. The Council will work with Highways England and Kent County Council to improve accessibility elsewhere in Kent between the two principal access routes to the Port of Dover, the M20 and the A2. The Council will work with partners to improve access to the local and High Speed rail network."

DM Policy 29: The Highway Network and Highway Safety

DTC Transport & Infrastructure Committee comment: *The reference to cumulative impacts is welcome, but this is qualified by the word "severe". Similarly, the policy talks of "significant traffic movements". Neither term is defined. Developments in any of the strategic or non-strategic housing allocations will give rise to "significant" traffic movements where those developments are larger than 15 units as the traffic generated will be cumulative to the existing traffic within the existing built area. It is proposed that the following wording replaces the final sentence in DM Policy 29, in order to clarify levels of significance or severity of increased traffic: "A Travel Plan or Transport Assessment will be required for all residential developments of more than 15 units, the requirements of which will be secured by planning conditions, Section 106 agreement or through the Community Infrastructure Levy as is appropriate."*

DM Policy 30: Parking Provision on new Development

DTC Transport & Infrastructure Committee comment: *The wording in the text of the draft set out above although very well intentioned and worthy is rather ambiguous.*

However if we are serious about tackling climate change then we really must do something about reducing car journeys. Parking problems are a symptom of a much deeper malaise.

Put simply we need to demand a radical step change in behaviour whilst obtaining a substantial investment in public transport and infrastructure for this to work. Deal Town Council has been seeking to work with partners to achieve this aim. The motor vehicle lobby must be challenged.

We need to incentivise people out of their cars and onto bicycles and encourage much more walking.

Greater emphasis and effort needs to be given in supporting new developments with no car parking provision but this has to be done in tandem with educating and changing peoples attitudes and behaviour and improving pavements, roads and cycle path networks and delivering substantial investment in public transport is urgently needed.

However it must also be the case that great care and sensitivity is also required to ensure that the legitimate parking needs of people with disabilities are properly assessed and met.

The principal way to reduce parking and congestion caused by insufficient spaces on our roads is to provide affordable accessible responsive public transport. In addition as part of the overall drive to improve the health and well-being of our community we should encourage people to use their cars less and at the very least get people to review the need for more than one car per household whilst at the same time encouraging cycling and walking. This approach will also have a beneficial impact on environment.

We should also push car sharing more as well as the use of local taxi services as a way of avoiding dependence on car use.

We also need to invest in enforcement as nuisance parking causes congestion and contributes to the worsening of air quality if people have to drive around looking for parking spaces.

Deal Town Council would welcome being involved in the proposed consultation on the District's stated intention of updating its Parking Strategy.

DM Policy 31: Providing Open Space

DTC Transport & Infrastructure Committee comment: *The current conditions in which we live, where public movement is limited has highlighted that access to open spaces near to where you live is vital – it has proven benefits to peoples physical and mental health. It has been found that even just sitting outdoors for two hours a week can improve health and wellbeing and lower stress (Gilchrist, Natural England, 2019) and the risk of cardiovascular disease is lower in residential areas that have more green space (Blackmore et al., 2017)*

DM Policy 32: Playing Pitch Strategy

DTC Transport & Infrastructure Committee comment: *Is welcome however consideration should be given to the provision of other exercise facilities such as outdoor gyms, skateparks, and multi-use areas.*

DM Policy 33: Protection of Open Space

DTC Transport & Infrastructure Committee comment: *An ecological survey should be undertaken before any loss of open space is considered. If it is of high biodiversity of ecological importance loss of the space should not be permitted.*

Protection of tranquil areas should be added to this policy. Examples of such policy can be seen locally at Swale Borough Council – not only has tranquillity been proven to reduce stress, improve physical and mental health (CPRE, 2006) it can also be economically beneficial for the local area with tranquillity being a major draw for tourists to the countryside (CPRE, 2006).

Open Space quantity standards

Open Space quantity standards should include "Desired quantity standards" as well as "Minimum Thresholds". This would allow developments to be benchmarked. These benchmarks should reflect Green Flag Award accreditation which sets standards for: A Welcoming Place, Health, Safety and Security, Maintenance and Cleanliness, Environmental Management, Biodiversity, Landscape and Heritage and Community Involvement. Consultants Knight Kavanagh & Page (KKP) are part of this accreditation scheme.

Biodiversity minimum area thresholds ("Desired quantity standards")

The natural & semi-natural greenspace typology is completely missing from the Knight Kavanagh & Page (KKP) recommended minimum area thresholds ("Desired quantity standards"). The needs and impact of quantitative and qualitative deficits of open space which relate to natural green space and biodiversity is well reported (Kowarik, Fischer and Kendal, 2020). Moreover, KKP are part of the Green Flag Award accreditation

which stipulates management of spaces needs to include the Environmental Management of Biodiversity. Therefore, the recommended minimum area thresholds and desired quantity standards for natural & semi-natural greenspace should be included within the local plan if the plan is to be fit for purpose.

Green space fragmentation and Green Corridors

There is a great deal of scientific evidence that fragmentation and stratification of green spaces is detrimental to the health, wellbeing and biodiversity of communities (Aziz and Rasidi, 2014). Any robust and up-to-date local plan, which includes green infrastructure, should therefore reference how to overcome the detrimental effects of green space fragmentation.

A well-researched and widely adopted approach is to stipulate 'green corridors'. Green corridors are a strip of land established to enable the bridging between open spaces. Green corridors in urban areas can be defined as linear natural infrastructure, such as trees and plants, that link up other green and open spaces to form a green urban network. These networks include, but are not limited to Biodiversity corridors which provide habitat links, areas with continuous tree/shrub canopy and hedgerows that provide habitat for wildlife and "Greenways", sustainable transport and traffic-free routes that connect people and wildlife to open spaces and other destinations.

These networks provide both ecological services, such as habitats and resources for urban wildlife; whilst also providing services to urban populations such as mobility networks and access to green spaces through the provision of sustainable and active transport routes that link transport with mixed land use (residential, commercial, education, recreation etc) and open spaces. There is also an opportunity to produce specialist standards in this area.

Aziz, H. A. and Rasidi, M. H. (2014) 'The role of green corridors for wildlife conservation in urban landscape: A literature review', IOP Conference Series: Earth and Environmental Science, 18.

Kowarik, I., Fischer, L. K. and Kendal, D. (2020) 'Biodiversity Conservation and Sustainable Urban Development', Sustainability, 12(12)

DM Policy 34: Community Facilities

DTC Transport & Infrastructure Committee comment: Is welcome – pleased to see the emphasis given to local communities identifies community assets and needs

DM Policy 35: Digital Technology

DTC Transport & Infrastructure Committee comment: The recent experience during the Covid pandemic crisis has demonstrated just how essential it is for all in the community to have full access to high quality, high standard accessible to all digital infrastructure. This is to support all current and developing forms of modern communication and digital technology and is absolutely critical for business, leisure, learning, health and other facilities.

We must not allow a two tier system to develop which will exclude those on low incomes or limited educational attainment and consign them to a second class existence. We must also embrace thoroughly the particular needs of the disabled and our senior citizens. There must be a basic level and clear standard of digital provision as an underpinning minimum.

In recognising this it is also the case that there are many in our community that don't have access to computers, tablets and other technology etc nor do they want to. They feel uncomfortable with digital technology and in truth never will. All too often these people are left behind and this is unacceptable. We should ensure that there is face-to-face and telephone contact on key services particularly all public services but also for services provided by the private sector.

In addition to the points made in the green box under the DM Policy 35 we suggest penalties or other sanctions should be developed in the event of any attempt by developers to bypass or renege on the essential policy aim of providing high quality dependable accessible digital infrastructure.

Substantial investment is required by the government. We should return to the model whereby Government, on behalf of the community, owns the infrastructure whilst employing local businesses to carry out the necessary work. As such a high level of investment is required; the government is uniquely placed and can borrow cheaply at present to provide the funding required. However the benefit of this investment should be

accrued by the community and not private shareholders beyond reasonable profits that are to be made by approved, recognised quality contractors.

Additional comments from DTC Planning Committee:

The consultation funded by DDC some years ago about the viability of a relief road to the north west of Deal showed that it was not viable without considerable devastation to the local environment. It would also cost in the region of £50 million because it was over flood plain and marshland.

Section 10: Design

Strategic Policy 15: Place Making

DTC Planning Committee comment: *It would be good to add something here supporting about radical ideas and solutions being incorporated into design - community composting, EV car sharing schemes, community energy generation. I know it mentions sustainability, but I feel there is too much focus on keeping things visually similar.*

DM Policy 36: Achieving High Quality Design

DTC Planning Committee comment: *Recommend the 'where appropriate' be removed at the end of g), so: g) Ensure that existing features, including trees, natural habitats, boundary treatments and historic street furniture, that positively contribute to the quality and character of an area, are retained, enhanced and protected.*

DM Policy 37: Quality of Residential Accommodation

Additional comments from DTC Planning Committee:

This a very welcome addition to the Local Plan not least the emphasis on local Design guides.

Section 11: The Natural Environment

Strategic Policy 16: Protecting the District's Hierarchy of Designated Environment Sites

DTC Environment Committee comment: *We consider that development where significant harm to locally identified biodiversity assets cannot be avoided, should not be permitted; and we recommend that the final paragraph of the policy be removed:*

'Where harm to designated sites cannot be avoided, appropriate mitigation will be required in line with a timetable to be agreed with the Local Authority. Normally any mitigation measures will be required to be on-site, unless special circumstances dictate that off-site mitigation is more appropriate. A financial contribution - in lieu of on-site mitigation - will only be considered in very exceptional circumstances and where it is demonstrated that the proposed mitigation is deliverable and effective.'

Strategic Policy 17: Green Infrastructure and Biodiversity

DTC Environment Committee comment: *The Topic Paper on the Natural Environment suggests the existing policy CO8 relating to 'Development which would adversely affect hedgerows' will not be retained. Whilst it may be under-utilised for planning objections, retention of existing hedgerows is important for biodiversity as well as carbon sequestration. We would ask that CO8 be retained and incorporated into the Local Plan.*

DM Policy 38: Biodiversity Net Gain

DTC Environment Committee comment: *We consider that as legislation requires biodiversity net gains should amount to 10% as a minimum and aim to achieve more wherever possible, that we should increase our ambition. The Kent Nature Partnership (KNP), of which the District Council is a member, is currently considering a doubling in the requirement to 20% in net gain from all developments across the county, so we propose that the figure decided upon by the KNP be adopted instead*

DM Policy 39: Landscape Character and the AONB

DTC Environment Committee comment: To agree and recommend the policy

DM Policy 40: Thanet Coast and Sandwich Bay SPA Mitigation Strategy

DTC Environment Committee comment: To agree and recommend the policy

DM Policy 41: Air Quality

DTC Environment Committee comment: To agree and recommend the policy

DM Policy 42: Water Supply and Quality

DTC Environment Committee comment: To agree and recommend the policy

DM Policy 43: The River Dour

DTC Environment Committee comment: To agree and recommend the policy

Section 12: The Historic Environment

Strategic Policy 18: Protecting the District's Historic Environment

DTC Planning Committee comment: *The Committee supports this policy*

DM Policy 44: Designated and Non-designated Heritage Assets

DTC Planning Committee comment: *The Committee supports this policy*

DM Policy 45: Conservation Areas

DTC Planning Committee comment: *The Committee supports this policy*

DM Policy 46: Archaeology

DTC Planning Committee comment: *The Committee supports this policy*

DM Policy 47: Dover Western Heights Fortifications Scheduled Monument and Conservation Area

DTC Planning Committee comment: *The Committee supports this policy*

DM Policy 48: Historic Parks and Gardens

DTC Planning Committee comment: *The Committee supports this policy*

Additional comments from DTC Planning Committee:

The current Plan was very weak on the Heritage of the district. This is a very welcome improvement. I welcome the emphasis on Appraisals although there are some minor errors (says the author of 5 appraisals!). I would welcome a much stronger emphasis on the creation of a Local List of Heritage Assets which the council has an obligation to create. I also welcome the recognition that conservation raises issues related to climate change and energy efficiency. The requirement for strong and detailed Heritage statements is crucial to listed building and conservation area applications. Currently they vary and are sometimes worse than useless.

Additional comments from DTC Planning Committee:

Section 4

Vision & Objectives

Whilst welcoming the overall vision I am not convinced that it takes the social and economic impacts of the pandemic seriously enough. The current Local Plan was fatally weakened by a refusal to take account of the 2008 financial crisis and ploughing ahead with a high growth strategy despite all the warnings from local community groups.

Additional recommendation from DTC Planning Committee:

Cllr Eddy's report on The Historical Environment to be included in the recommendation submitted to the Extraordinary meeting of Full Council on 10 March 2021.

THE HISTORIC ENVIRONMENT

Cllr M Eddy:

Chapters 1, 2, 3 and 4

Chapters 1 and 2 describe the legal and practical reasons for the Local Plan and how to engage with the consultation process respectively.

Chapter 3 summarises the nature of the area, the characteristics of the population and the key factors influencing the Local Plan.

Population

Figures 3.2 and 3.3 compare the population pyramids at the 2011 census and then at the 2018 estimate. This shows that the population of Dover District is ageing. The figures also demonstrate that the younger elements of the population (15-19 in 2011) have not been retained. Nevertheless there has been a total cumulative migration of 6,265 persons into the district, 80% of whom were internal migrants (i.e. from elsewhere in the UK). The cumulative total of internal migration is significant over the period as is shown in Fig. 3.4.

The Local Plan admits that the bulk of the in-migration is made up of people who are middle-aged or older. It is more coy, not to say silent, about the loss of younger people from the area.

Health

This section covers a number of health indicators but would have been better entitled "Deprivation". There is a facile equation between children in low income families (19.4%) and childhood obesity (19.1%) implicit in paragraph 3.7. Dover is ranked 107th out of 317 English council areas by deprivation indices, where 1 is the most deprived. And three wards in Dover town area are in the 10% of most deprived wards in the country. Educational attainment is worse than the national average.

Climate

The Local Plan records DDC's declaration of a Climate Emergency and the creation of a Climate Change Member Working Group as well as DDC's commitment to being a zero-carbon council by 2030 and a carbon neutral district by 2050. Fig. 3.5 provides an indication of the sources of carbon dioxide by sector and how that reduced sharply between 2008 and 2009 but more slowly since then. Paragraph 3.13 emphasises the problem of water resources in an area which receives low rainfall and is dependent on groundwater extraction.

Housing

This shows that Deal has taken the brunt of housing development over the previous Plan period, while "Dover" (including Whitfield etc) has under-delivered on house building targets. It does confirm that Dover has a higher than national average of council housing in its housing stock, though overall its social housing stock is below the national average. House prices are below the Kent average and well below the national average.

The district has 1,448 vacant properties of which 1,257 are second homes. In Fig. 3.2 the proportion of second homes is given as 2.3% but in the text immediately above the percentage is given as 2.1%. Vacant properties of both types have increased in number over the last 5 years.

Economy

Earnings are below the Kent average. There are fewer people employed in professional or technical roles than the Kent average and more in transport, public administration and manufacturing. The district has changed to being a net exporter of employees from a state of equal inward and outward movements of labour.

Levels of educational attainment have improved, though from a low base, and are still lower than the Kent and national averages.

Transport

The district is described as being "highly accessible by rail, road and sea", whilst it also claims that the district has high speed rail connections to London, when the reality is that HS1 trains pass through the district and are high speed only from Ashford. There is no discussion of the capacity of the A roads within the district or of other forms of transport at this stage in the document, nor is there mention of the problems caused by cross-Channel transport delays to communications in the immediate hinterland.

Natural Environment

The document lists the various designations of protected landscapes and a number of "Green (sic) infrastructure sites" which include parks and gardens as well as nature reserves.

Historic Environment

The document refers to the district's listed buildings (just under 2,000), its 48 scheduled ancient monuments, 57 Conservation Areas and 12 museums. The national and international importance of some of the district's historic assets is noted, as is the impact of the mining industry and the involvement of Abercrombie in the design of Aylesham.

Impressions at this Stage

This Chapter is very much a picture of the state of the district but it shows little sign of ambition, perhaps a reflexion of size and positioning of the Plan's subtitle "A bold vision for 2040" on the cover.

The programme of house building envisaged by the document seems designed more to satisfy the needs of older people moving into the area rather than being aimed at helping to retain younger people in the district.

Similarly, though the levels of educational attainment have improved, there appears to be no intention of using the Local Plan to improve that position further by, for example, specific policies to encourage higher education establishments to develop facilities in the district, and thereby to develop a knowledge based economy beyond the former Pfizer's site. This would contribute to raising the average level of earnings in the district and to combating the high levels of deprivation experienced in some wards.

The passage about transport seems very much at odds with the lived experience. HS1 trains travel through the district but are not high speed. The principal road system, terminating at the port of Dover, is subject to delays during bad weather or other exceptional circumstances, and the local roads are inadequate, though not as inadequate as public transport or cycling provision.

The brief introductions to the natural and historic environments lack ambition despite the references to their national and international importance which could be taken advantage of in order to strengthen both the knowledge based and tourist economies.

Chapter 4 Overarching Vision:

This Chapter identifies 4 aspects which comprise the "Overarching Vision". They are introduced by the statement: "Dover District in 2040 will be a place of aspiration", the subtext being that it the District's only aspiration in 2021 is to have some by 2040. The 4 aspects are: Prosperous Economy; Vibrant Communities; Thriving Places; and Spectacular and Sustainable Environment.

Prosperous Economy

In part, this prosperous economy will build on local entrepreneurial talent. However, as the previous chapter shows, there is a loss of local young people and a lack of educational attainment among remaining local people which this Plan shows little evidence of intending to alter.

The district's ability to attract new businesses is reliant on a "21st century infrastructure" and "unrivalled transport connections with London and Europe". Again, the lived experience is that, though the transport connections may be unrivalled when functioning well, they are far from adequate when any stress is placed on any one transport mode.

The attractiveness of the district for visitors is clear but there is nothing in the Plan to suggest that by 2040 the district will possess "a diverse range of high-quality accommodation" for visitors.

Vibrant Communities

Apart from offering new developments that "respect the spectacular natural environment ... of the District", it also offers "a supply of new homes that meets people's needs and where affordable and local housing is prioritised". This is difficult to reconcile with the proposal to build houses over the catchment area of the aquifer to the south of Deal (DEA020) or with the scale of internal migration into the area as shown in Chapter 3 (Figs 3.2 and 3.3). This section also claims that there will be improved educational facilities though these are not apparent in the Plan, just as the means of delivering "extensive" green spaces and an "enhanced network of dedicated walking and cycling routes" are elusive.

Thriving Places

According to this section, "Dover town will be thriving with a strong core of local shops and services", which statement is at odds with the current moves to on-line shopping. The reference to "regenerated areas of existing housing" is promising but is not borne out by the housing policies for Dover which rely on substantial new build on green fields north of Dover.

Deal and Sandwich are apparently to benefit from investments in culture, though again there is no evidence of how this will be delivered in the context of the Plan.

The villages across the district will be provided with "improved community facilities and housing opportunities, enabling more young people to stay". Again, given the level of internal migration and lack of commitment to maintaining levels of affordable housing within existing commercial housing developments, this seems unlikely.

Spectacular and Sustainable Environment.

It is instructive that this section is the last, rather than the first, of the aspects of the Plan's Vision. It is erroneous to claim that "the climate change emergency will have delivered increased opportunities for local food production, extensive tree planting and the adoption of sustainable design". The climate emergency will allow for changes to local food production but, if measures are not taken through the Plan to safeguard and enhance water supplies and storage, it is more likely to reduce local food production.

Strategic Objectives

Strangely, the 4 aspects of the Overarching Vision are altered for listing of the strategic objectives which become Prosperous Economy; Vibrant Communities; Spectacular and Sustainable Environment, and Cross Cutting Issues.

There is nothing fundamental within the Vision or the Strategic Objectives to object to as they are all desirable outcomes. However, apart perhaps from the greater use of the words "sustainable" and "sustainability" there is little to distinguish the vision and objectives of this Plan from previous Local Plans.

What emerges at this stage

The bulk of house building is actually to provide for internal migration into the district.

That in-migration is mainly of middle-aged and retired people who by the end of the Plan period will have required additional health and social care services.

The district has become a net exporter of young people and of working-age people generally, a factor which runs counter to the intention of creating a prosperous economy within a series of vibrant communities.

There is a need not just for affordable housing within the private sector but for social and council housing, rather than for purely commercial builds.

There is no apparent USP or coherent group of selling points within the Plan which might persuade businesses or major institutions to invest or for young people to remain in the area.

The view expressed in the Plan of infrastructure in general and transport in particular is very much at odds with the lived experience of residents and users. A more realistic portrayal of the problems of co-existing with the modal shifts required by transport locally would give greater confidence in the ability of the Plan to deliver the objectives and the vision.

There is an opportunity to put the environment and the principles of sustainability at the forefront of the Plan's vision, rather than as an apparent add-on to the 4 aspects of the vision. A prosperous economy, vibrant communities and thriving places all depend on a sustainable environment.

Proposed Amendments

1. The Spectacular and Sustainable Environment should be the first of the 4 aspects of the Vision, followed by Vibrant Communities, then Thriving Places and finally a Prosperous Economy, as a prosperous economy can only be delivered with the other elements in place (para 4.1).
2. The single paragraph on Transport and Infrastructure (para 3.30) should be expanded in order to outline the problems involved in the modal shifts from road to sea within the District and from road to rail outside the District. This would make it easier to argue for the necessary improvements to the A2 and for the bifurcation of traffic on the two main arterial roads coming into the port, the A2 and the M20.
3. The issue of housing needs greater clarity. It would appear that building houses is an objective in itself, whereas what is required is housing that meets the needs of local people. This requires the focus to be placed on social housing, whether council or housing association, rather than on private sector housing.

Chapter 12 Historic Environment:

1.0 This Chapter is generally very positive in terms of the draft policies for the protection and enhancement of the historic environment. There is, however, a requirement for a specific policy dealing with any developments within the Lydden Valley/former Wantsum Channel, the evolution of which may well be germane to our understanding of the creation of the English Channel (see below) as there is for Dover Western Heights.

2.0 Strategic Policy 18 is to be supported.

3.0 DM Policy 44 is welcome in that it refers not solely to the heritage asset but also to the setting of the asset. There is also a requirement for a Heritage Statement where a "heritage asset or its setting" are likely to be affected. The whole building approach to developments involving energy conservation improvements is to be welcomed.

3.1 Where DM Policy 44 is weak is that it does not explicitly require conservation of an asset by recording. A suggested addendum to this policy would be at the end of the third paragraph: "... securing the optimum viable use of the heritage asset or ensuring its preservation through appropriate recording." This would link DM Policy 44 more directly to DM Policy 46.

4.0 DM Policy 45 Conservation Areas is generally welcome though the introductory sentence should be strengthened to read: "Applications for development or redevelopment in Conservation Areas will only be supported provided that such proposals preserve or enhance the special architectural or historic character and appearance of the Area and its setting."

Within this Policy, however, consideration should be given to reducing heat and energy loss and to sensitive solutions to providing energy efficient heating systems by adding a suitable further bullet point along the lines of: "Employ sustainable heating systems, such as ground source heating, and means of reducing energy and water consumption as are compatible with securing the sustainable future of the Area and its setting."

5.0 DM Policy 46 Archaeology is welcome.

6.0 DM Policy 47 Dover Western Heights Fortifications Scheduled Ancient Monument and Conservation Area rightly emphasises the importance of the intervisibility of features both within the monument and with the wider landscape in order to fully understand the historic significance of the monument.

7.0 DM Policy 48 Historic Parks and Gardens is welcome.

8.0 The Lydden Valley/former Wantsum Channel is identified in Chapter 11 as forming a group of Landscape Character Types ((LCTs A, B and C) paragraph 11.42 and Table 11.1). Elsewhere in Chapter 11 (Fig. 11.1) the concentration of National Nature reserves, SSSIs and Special Protection Areas where the Wantsum meets the English Channel is demonstrated in map form. Historically, it is known that the Wantsum Channel provided a route for water borne traffic avoiding the more difficult waters around the North Foreland. Little is known of the evolution of this Channel and its silting up. As an area of more or less open water at different periods in the past various historic artefacts might be expected, such as fish traps, landing stages, salt working sites, temporary or permanent settlements taking advantage of the varied environments, and perhaps water craft. Ground disturbance along the line of the Wantsum Channel and its edges are likely to produce organic palaeo-environmental evidence which will add to the limited inorganic palaeo-environmental evidence from sites on chalk downland. This material could include timber structures and artefacts, vertebrate and invertebrate fauna, pollen, and aSedDNA.

8.1 The Wantsum Channel is generally assumed to have been an open channel between the mainland of Kent and the Isle of Thanet, but how that channel arose in the first place is unknown. Given recent research into the creation of the English Channel, it may well be that the Wantsum Channel was created by the same tsunami, caused by the Storrega underwater rock slide, that obliterated Doggerland and carved out the present English Channel around 8,000 BC. The area potentially has immense national and international importance for understanding the late Palaeolithic and Mesolithic periods as well the development and use of the landscape in more recent periods.

8.2 The inclusion of a specific statement and policy for the Lydden Valley/Wantsum Channel and its margins would appear appropriate, matching that for the Dover Western Heights and the Dover Town Centre SPD. It is suggested that the following statement is inserted after paragraph 12.29:

"12.30 The Lydden Valley/Wantsum Channel provided a water route south of the Isle of Thanet avoiding the more difficult waters around the North Foreland at various times in the historic past. The origin of the Wantsum is unknown but may be linked to the formation, around 8,000 BC, of the English Channel as we know it today. Ground disturbance within the Wantsum and along its ancient shore line is likely to reveal evidence of the origin and development of this important landscape feature as well as evidence of its use from the Mesolithic through to the present day.

DM Policy 48 The Lydden Valley/Wantsum Channel

Proposals for development within the Lydden Valley/Wantsum Channel which make provision of appropriate archaeological and palaeo-environmental investigation prior to development will be supported. For the purposes of clarity the limits of the Lydden Valley/Wantsum Channel's archaeological and palaeo-environmental area of interest will be co-terminous with the limits of the Environment Agency's Flood Risk Map."

8.3 Paragraph 12.30 and Policy DM 48 Historic Parks and Gardens to be renumbered accordingly to take account of the proposal above