

Aylesham Parish Council

Response to Dover District Local Plan – Regulation 19



1.0 Introduction

1.1 Dover District Council has provided a Draft Local Plan that outlines development within the district up until 2040. In order for residents to make an informed decision about the Draft Local Plan, Aylesham Parish Council has provided a comprehensive and coherent response.

1.2 This response relates to the following documents: Dover District Local Plan Submission Document; Regulation 19 – Sustainability Appraisal; Infrastructure Delivery Plan Draft for Consultation 2022; and Regulation 19 – Habitats Regulation Assessment.

1.3 The Draft Local Plan has set out 4 key objectives:

- Prosperous economy
- Vibrant communities
- Spectacular and sustainable environment
- Addressing Cross cutting issues

This has been updated to the new overarching vision of:

- Spectacular and sustainable environment
- Prosperous economy
- Vibrant communities
- Thriving places

1.4 Aylesham Parish Council submitted a response to the Regulation 18 Consultation in March 2021, as well as running a campaign within the community to encourage others to do the same. 76 residents responded to Dover District Council as a result.

Regulation 19 is an updated Draft Local Plan ready for submission.

2.0 New Site Locations

2.1 Aylesham North (500 homes) has now been removed from the Draft Local Plan. Aylesham Parish Council welcomes this decision.

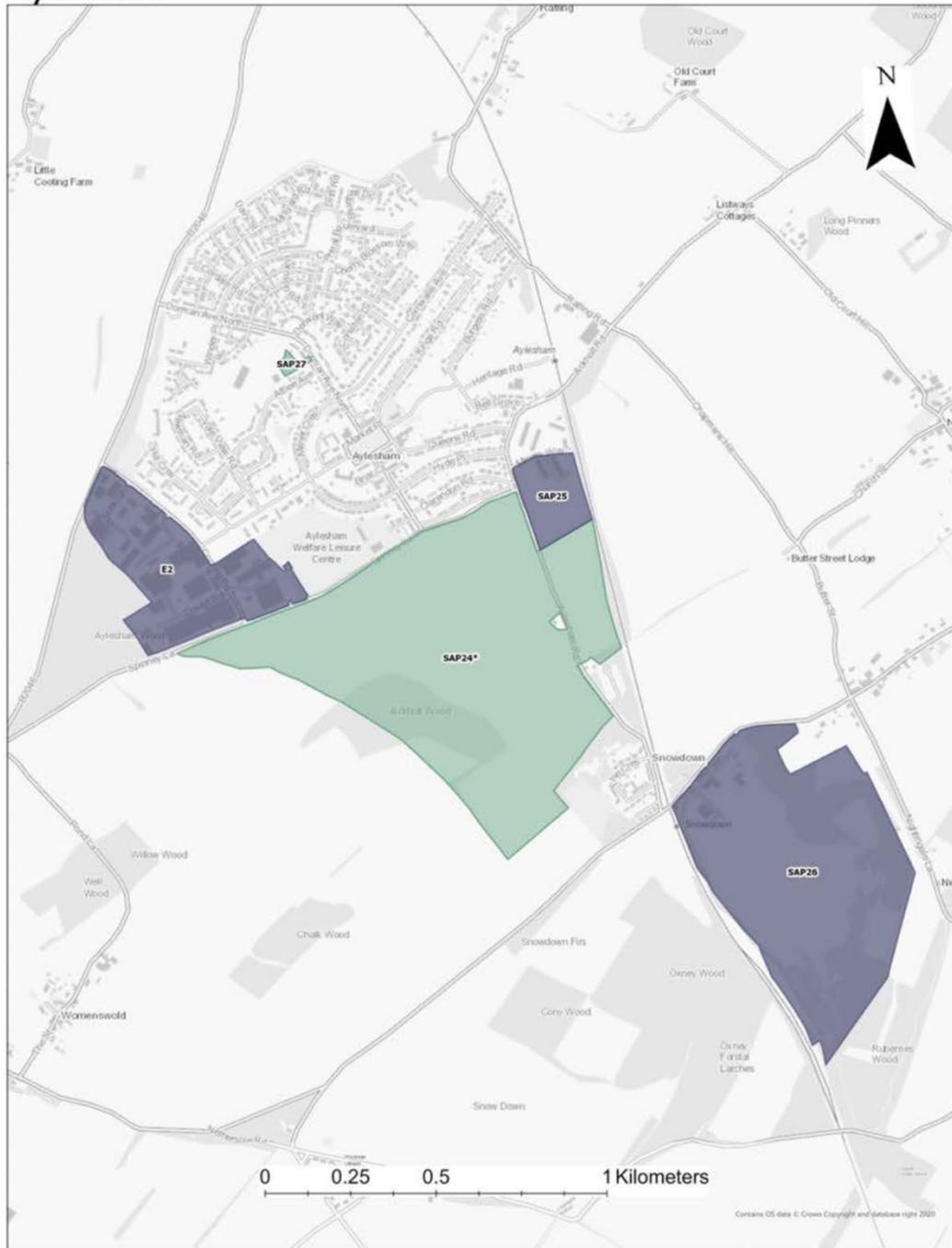
2.2 In the south, site AYL003 runs from Spinney Lane (with Aylesham Road to the East and Ackholt Wood to the West) all the way to housing in the village of Snowdown. This site has a proposed development of 640 homes. The site map has been amended (as per SA¹) to properly reflect land ownership and remove a private property from the proposed area.

¹ Sustainability Assessment

This relates to SAP24 South Aylesham.

2.4 In addition, there is 1 smaller site (AYL001 policy SAP27) located on land on Dorman Avenue North. Initially this land was due to be windfall housing but is now allocated for 9 houses.

Aylesham



Legend

- Reg19 Employment Allocations/Retentions
- Reg19 Housing Allocations

*An indicative site plan is available for Land to the South of Aylesham under Policy SAP24

Both site allocations are shown below (taken from Figure 4.5, page 142 of the Draft Local Plan):

2.5 Aylesham Parish Council opposes the uses of AYL001 for the development of 9 houses as this would result in the loss of registered native woodland.

AYLESHAM PARISH COUNCIL BELIEVES THIS LEVEL OF DEVELOPMENT IS OVER-BEARING ON THE VILLAGE AND RISKS ALTERING THE CHARACTER OF THE COMMUNITY. THIS IS FAR BEYOND THE ORIGINAL MASTER-PLAN.

3.0 Potential Improvements to Amenities and Infrastructure

3.1 Over the past few years, Aylesham has seen a vast amount of development. This has put considerable strain on local amenities such as local shops and medical services.

3.2 Any possible future developments, whatever size, must provide Aylesham with additional facilities, in particular for young people, local shopping facilities and the infrastructure that will allow more people to move freely around the village.

AYLESHAM PARISH COUNCIL BELIEVES THAT ANY FUTURE DEVELOPMENT MUST IMPROVE AMENITIES AND PROVISIONS FOR YOUNG PEOPLE.

3.3 In terms of transport, all future developments must focus on pedestrian and cycle traffic. With emphasis on the improvements of train and bus services appropriate to the size of the Parish, rather than road users to both combat road traffic and assist with the climate emergency.

3.4 Aylesham and Snowdown only have a regular bus service to Canterbury, and more recently there have been attempts to end school bus services to Dover. New development should bring a net increase in public transport, not a steady decline.

This relates to SP12 – Strategic Transport Infrastructure.

3.5 In addition, there is considerable strain on local roads and any future development must be accompanied with a plan to make significant upgrades to key routes such as Spinney Lane and B2046 (Adisham Road).

Considerations are mentioned in the IDP², but there are no firm commitments to immediate improvements.

3.6 Any chances of alleviating road traffic are severely hampered in Aylesham. Both the bus services and train service to Aylesham and Snowdown are completely substandard. Aylesham Train Station and Snowdown Train Station are both inaccessible for many residents.

AYLESHAM PARISH COUNCIL WOULD WELCOME THE OPPORTUNITY TO WORK WITH NETWORK RAIL AND SOUTHEASTERN TO ADDRESS THE ONGOING ISSUES WITH TRAIN ACCESS TO BOTH STATIONS.

3.7 The IDP identifies that “passenger numbers have risen significantly” and that Network Rail are looking to increase to half-hourly services. However, there are no firm commitments. In addition, the IDP states some improvements which may be beneficial, but makes not commitment to carry out its own suggestions: a second entrance; DDA³ compliant access; improvements to car and cycle parking; improvements to pedestrian access; and more waiting shelters.

² Infrastructure Development Plan

³ Disability Discrimination Act 2010

The IDP also highlights beneficial improvements to Snowdown station: DDA compliant access and better car and cycle parking. There are no firm commitments.

3.8 The IDP states that Aylesham is trialling a bus service from S106 contributions – for reference, at time of publishing, this is yet to come to fruition.

3.9 Aylesham is identified as in need of improvements to bus infrastructure. There are no firm commitments which are disappointing for a rural community, dependent on these vital services.

AYLESHAM PARISH COUNCIL BELIEVES THAT ANY FURTHER DEVELOPMENT CAN ONLY HAPPEN AFTER IMPROVEMENTS TO BOTH THE BUS AND TRAIN SERVICES TO AND FROM BOTH AYLESHAM AND SNOWDOWN. ENSURING PROVISIONS ARE SUSTAINABLE, ACCESSIBLE AND APPROPRIATE FOR THE SIZE OF THE WHOLE PARISH.

3.7 Aylesham village is significantly lacking in local amenities, even more so with the proposed expansion to the village. There is a clear need for amenities such as a pub-restaurant; improved medical services; supermarket and community facility such as a village hall.

The IDP suggests that current S106 funding is being used to provide “enhancements” to Aylesham Medical Centre, but we are of the understanding that this pays ground rent for the GP practice. This does little to increase capacity in the village. Any future funding must significantly increase capacity.

3.8 SP2 states that “new development is well served by services and facilities”. Given that the current doctors surgery cannot always meet demand, a lack of youth provision and a lack of nursery places, any new development would likely contravene this Strategic Policy.

AYLESHAM PARISH COUNCIL BELIEVES THAT ANY FUTURE DEVELOPMENT MUST IMPROVE AMENITIES BY PROVIDING A PUB-RESTAURANT; IMPROVED HEALTH CARE SERVICES; SUPERMARKET; NURSERY PLACES AND COMMUNITY FACILITY (SUCH AS A VILLAGE HALL).

3.9 There is a need identified in the IDP for increased sports hall capacity in Aylesham – at time of publication, this has still not been provided from S106 monies from the current development. These upgrades simply take too long.

3.10 The IDP makes reference to a proposed community facility/hall that is community/Parish run. Aylesham Parish Council has not been consulted on this plan and the possible spend of S106 monies.

4.0 Gypsy & Traveller Sites

4.1 The Draft Local Plan has removed the proposed new site for gypsy and travellers. Aylesham Parish Council welcomes this decision as the Parish sufficiently provides for gypsy and travellers.

The Site Allocations suggests that the site was “discounted as unsuitable due to [its] rural location and/or location in the AONB and therefore unacceptable landscape impacts”. It also goes on to state that the promoter for the land conformed the land was not available as a Gypsy & Traveller site.

5.0 Aylesham in the Dover District Settlement Hierarchy

5.1 Aylesham is designated as a “Rural Service Centre” on par with the town of Sandwich. Although Sandwich and Aylesham have equal weighting in the settlement hierarchy, they are not getting an equal weighting in housing development or in terms of investment. The Site Allocations refer to the district’s “existing larger settlements of Dover, Deal and Sandwich” but in reality Aylesham is now likely to have a larger population than Sandwich.

5.2 Aylesham is receiving 649 new homes (SAP24 and SAP27), whilst Sandwich has a proposed development of just over 200 homes.

5.3 The Draft Local Plan proposes investment in Sandwich to improve the town and protect its historic environment. In addition, it will see investment in culture. This is not the same for Aylesham.

This relates to SP3 – Housing Growth and SP10 – Sandwich Town Centre.

5.4 The residents of Aylesham should also see their cultural capital widened and enriched in such an extensive Draft Local Plan. Other than house building, there seems to be little else on offer. Funding should be provided for organisations such as cinemas, museums, galleries etc that will help to enrich people’s lives.

5.5 For a rural settlement, a further 640 houses, on top of a recent development of 1,360 seems to be somewhat excessive.

AYLESHAM PARISH COUNCIL BELIEVES THAT AYLESHAM IS BEING LEFT BEHIND. AYLESHAM MUST RECEIVE EQUAL INVESTMENT IN COMPARISON TO OTHER RURAL SERVICE CENTRES TO ENSURE THE VILLAGE THRIVES.

6.0 Climate Change and Ecosystems

6.1 In October 2021, Aylesham Parish Council supported the Climate and Ecological Emergency (CEE) Bill which address the full extent of the climate and nature crisis in the UK. As a result, any local plan should use up-to-date science to make sound recommendations.

6.1 As the district is extremely water scarce, all possible measures should be implemented to help mitigate water scarcity. The use of Sustainable Urban Drainage systems (SUDs) is required to be prominent in all future developments. This will help to deal with surface water flooding. We welcome the Draft Local Plan’s hierarchy of methods of discharge, with the use of combined sewers coming last.

This relates to CC6 of SP1 – Surface Water Management.

6.2 There are a number of options to ensure new homes produce the least possible carbon emissions. Aylesham Parish Council would like to see Dover District Council require the full 2025 Future Homes Standard to be delivered now (this will reduce emissions by between 75-80% compared to current standards), not at some point during the Local Plan’s lifetime.

This relates to CC1 of SP1 – Reducing Carbon Emissions.

6.3 We welcome the commitment to planting trees within new developments that are native to Kent. This will help to keep the rural feel of Aylesham alive. Currently we often see newly planted trees dying within the first few years of their lives. There must be a comprehensive plan to ensure that these trees reach maturity (part d) and how this will be enforced by the local authority.

This relates to CC8 of SP1 – Tree Planting and Protection.

AYLESHAM PARISH COUNCIL WELCOMES THE COMMITMENT TO PLANTING LARGER NUMBERS OF TREES BUT FEELS THIS MUST COME WITH A LONG-TERM SOLUTION TO MAINTAINING THE TREES. DOVER DISTRICT COUNCIL MUST ALSO COMMIT TO THE FULL 2025 FUTURE HOMES STANDARD NOW.

6.4 Aylesham Parish Council welcomes the addition and enhancement of open spaces and play areas. However, there are two points to note in the IDP: why would S106 monies from Aylesham be spent upgrading play areas in Nonington?; and play areas and open spaces are last to be delivered in developments – this must not happen in the future.

6.5 Aylesham Parish Council is identified as “Delivery Partners” on a number of projects due to be delivered: we have not been consulted on this prior to the Regulation 19 document being released.

6.6 The HRA⁴ suggests that AYLO03 – Land South of Aylesham is “high” suitability for the European Golden Plover, and so all measures must be taken to ensure this SPA protected bird species is still able to migrate and flourish in the area. SAP 25 (mixed use employment) is considered “moderate”.

7.0 New Homes

7.1 Aylesham Parish Council agrees that there is a need to increase housing stock both nationally and within the Dover district.

7.2 Over recent years, Aylesham has greatly assisted in helping to increase the numbers of homes within the local community (having delivered 917 homes so far with a further 443 to come). However, it is felt that any future development should be kept to a minimum.

This relates to SP3 – Housing Growth.

7.3 South Aylesham (SAP24) includes a large number of positives (such as inclusion of play parks, open spaces, cycle links and protecting and enhancing wildlife) but there is a lack of firm commitments to facilities. The development makes reference to “a new small convenience shop” which is wholly insufficient for the proposed number of new homes.

7.4 Dover District Council is looking at updating its parking policy for future developments. Currently the Kent Design Guide and the Kent Design Guide Review: Interim Guidance Note 3 to apply planning constraints. It is welcome to see this referenced in the Draft Local Plan. It is important that future developments allow for independently accessible parking spaces (as opposed to tandem spaces) and that car ports or garages are not included as parking.

This will greatly improve parking, especially in rural developments.

⁴ Habitats Regulation Assessment

7.5 More considerate parking will greatly improve access for pedestrians as well as safety for pedestrians and cyclists.

AYLESHAM PARISH COUNCIL BELIEVES THAT A NEW SMALL CONVENIENCE SHOP IN ANY NEW DEVELOPMENT WOULD BE WHOLLY INSUFFICIENT. DOVER DISTRICT COUNCIL SHOULD ALSO LOOK TO ADOPT MORE STRINGENT PARKING POLICY REFORM.

7.6 It has been noted on previous planning applications that the sewerage pipes in the village may be at their capacity, so any further developments could push them past their breaking point.

This should be addressed before any further development can be considered.

7.7 Current plans for housing development do not go far enough in providing homes that are suitable for disabled people or homes that can be easily adapted in the future to meet the needs of home owners. An increase in the number of dwellings built to an accessible standard would be welcomed.

8.0 Employment

8.1 There is a welcome addition to employment within Aylesham proposed in the Draft Local Plan. The proposed site is next to the existing employment area along Ackholt Road/Aylesham Road (SAP25).

8.2 This could support mixed use development, B1 and B2 retail units.

8.3 Aylesham Parish Council also welcomes the addition of the former colliery site in Snowdown as mixed-use development. This will ensure the heritage of the area is kept for future generations.

AYLESHAM PARISH COUNCIL WELCOMES THE ADDITIONAL EMPLOYMENT OPPORTUNITIES WITHIN THE PARISH.

9.0 Maintaining Aylesham's Heritage

9.1 The Draft Local Plan suggests that Dover District Council wishes to enhance "heritage assets, in order to protect their significance and to ensure that they can be best appreciated and enjoyed".

9.2 The colliery site in Snowdown had been identified during the call for sites in 2017 but deemed unsuitable initially but is now included in the Draft Local Plan for mixed use, non-residential development.

This relates to SAP26.

AYLESHAM PARISH COUNCIL WELCOMES THE ADDITION OF DEVELOPMENT AT THE SNOWDOWN COLLIERY SITE IS TO ENSURE THE HERITAGE IS NOT LOST AND CAN BE ENJOYED BY GENERATIONS TO COME.

10. Education and Children

10.1 According to Kent County Council's childcare sufficiency analysis, Aylesham currently has a significant deficit of 0-4 yr old childcare places, 5-11 yr old breakfast club places and 3 & 4 yr old extended entitlement places in our nursery's. The plan must go further than listing a whole host of possible "off-site" provisions to safeguard this vital sector.

10.2 The IDP is incredibly disappointing in its lack to address Early Years provision: Dover District will need 11.8 early years settings but there is no plan to address this.

AYLESHAM PARISH COUNCIL BELIEVES IT IS VITAL THAT DOVER DISTRICT COUNCIL ADDRESSES THE DEFICIT OF EARLY YEARS PROVISION ACROSS THE DISTRICT, PARTICULARLY IN RELATION TO ITS IMPACT ON AYLESHAM.

10.3 Secondary school age children have to travel by bus or train to Dover, Deal and Sandwich schools. Often, these buses are overcrowded or full and so do not stop at all designated stops to pick up school children leaving them stranded before school. Recently, the 96A to Dover Christ Church Academy was planned to be cut from Stagecoach's timetable.

TRANSPORT TO SCHOOLS MUST IMPROVE AS THE VILLAGE INCREASES IN SIZE.

10.4 The IDP identifies the Dover District may need a new secondary school (post 2030). Given Aylesham's ever increasing population, serious consideration should be given to Aylesham as a possible location.

Appendix 1 – Press release

For immediate release:

Whilst Aylesham Parish Council agrees there is a need to build homes both nationally and within the Dover District, Aylesham has certainly seen its fair share of development recently.

New houses, without adequate local infrastructure, put significant strain on local amenities like medical services, shops, nursery places, as well increasing traffic on our roads.

We welcome the fact that 500 homes in ‘North Aylesham’ have been removed from the Draft Dover District Local Plan, but this still leaves a huge development of 640 houses linking Aylesham and Snowdown into one large settlement. When it’s finished, the current development will contain over 1,200 houses and so an additional 640, in what is considered a rural setting, seems rather excessive.

It is also welcomed to see the former Snowdown Colliery site featuring in the Draft Dover District Local Plan for mixed use development: this will allow future generations to appreciate the local heritage whilst creating jobs for local people.

All of this must not come at a cost to locals: any development must improve Aylesham, and not let it get left behind.

Aylesham Parish Council urges all residents to use this opportunity to help shape the village over the next two decades and share your views with Dover District Council.

Dover District Draft Local Plan Regulation 19 seven-week Consultation begins Friday 21st October 2022