



DDC LOCAL DEVELOPMENT PLAN PUBLIC CONSULTATION SUMMARY REPORT



Fredville Park Nonington 2020

prepared for
Nonington Parish Council
February 2021

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KEY FACTS



100%

of all population growth
in Dover till 2030 from
inbound migration.

{1}

71%

of Dover's LDP houses in
Aylesham, Elvington &
Whitfield - Population rises
15,000 -35,000

{2}

0%

Empirical evidence on
Dover's minor rural roads
north of A256 considered in
the LDP

{3}

25%

the LDP's population growth
projection is 25% higher than
the ONS (Office for National Statistics)
inflating requirements.

{4}

71%

of all development on
environmentally harmful
greenfield sites, concreting
over the countryside.

{5}

DDC

Estimated Net Revenue Gain

£25,000,000

Aylesham Development

2013-2020

{6}

{1} Source:Office of National Statistics (ONS) Regional Growth Estimates 2018

{2} DDC LDP - Strategic & Non Strategic Dwelling Allocation 2020 sorted by Ward

{3} LDP Evidence - WSP Dover Transport Model Local Plan Forecasting Report 2021

{4} Strategic Housing Market Assessment – Part 1 & 2 (2016 & 2019) - Peter Brett Associates

{5} DDC LDP Strategic + Non Strategic Housing Allocation 2020

{6} Dover Whole Plan Viability Study Nov-20 HDHP&D Ltd + New Homes Bonus Allocations 2019-20
Ministry of Housing, Communities & Local Government

DDC LOCAL DEVELOPMENT PLAN ROAD MAP

Central government housing targets force Local Authorities to accept developments where 'quotas' are not met, bypassing the wishes of communities expressed in local plans.

DDC commission Peter Brett Associates to calculate housing number requirements based on 2016 data using 'Standard Method' calculation based on a formula imposed by central government.

- 1) LDP public consultation delayed as a result of Covid-19.
- 2) HELAA consultation completed and site evidence presented.
- 3) WSP DDTM Traffic Modelling Report submitted.
- 4) DDC change Elvington status from village to allow development.
- 3) Draft LDP published December 2020.

Government publish a White Paper setting out the most radical overhaul to the planning system since WW2. Called a developer's charter, this minimises local input and control. A backbench revolt by a large number of Tory MPs including Theresa May is ongoing.

January - 18th March 2021 - DDC hold an online Local Plan public consultation during a national lockdown. No letter is sent out to parishioners. Awareness is low in Nonington.



2015

Mayor Johnson identified Canterbury, Dover and Thanet as locations to take 115,000 extra homes for London's overspill population. (<https://www.kentonline.co.uk/canterbury/news/kent-could-bear-the-brunt-33026/>)

Construction on Aylesham Garden Village 1200 home development gets underway in earnest.

2016

2017

2018

2019

National Planning Framework Guidance 2019 removes the requirement to place houses where they are needed in a local area and compels local authorities to allocate additional housing for 'overspill' from other districts.

Peter Brett Associates revised housing numbers in line with new government directives from 560 dwellings / year to 596 - 630 dwellings / year.

2020

2021

Nonington Parish Council have commissioned an LDP review and are looking to work with other Parish Councils, stakeholders and the media.

Our goal is to ensure that LDP housing allocation is based on balanced and unbiased evidence, a robust public debate and considers the true impact on the minor rural road network.

2021



1.0 EXECUTIVE SUMMARY

1.1 Background

Dover District Council are conducting a public consultation on their Local Development Plan (LDP). The LDP lists 11,920 new dwellings planned for sites across the district.

Once a site is included in a Local Development Plan, there is a 'presumption in favour of development'. This presumption will be reinforced if the proposed changes to the planning system set out in the Government White Paper are adopted.

Because of its location, Nonington is at high risk of severe traffic impacts **from 2,500 proposed new houses** that look to increase traffic levels through the village by **an estimated 35%-40%**.

National planning guidance state that developments that generate 'severe cumulative residual impacts in terms of capacity and road safety' should be refused. However, DDC want the definition of 'cumulative severe impact' to be decided by them on a cases by case basis. This provides DDC with an effective veto on all traffic objections. It is **crucial that everyone in Nonington takes this threat seriously**. If we want to protect our village, **we must act now**.

1.2 Report Objective

The LDP proposals will have a huge impact on the future of our village. Nonington Parish Council commissioned this report to review the evidence and assumptions underpinning the draft LDP in order to identify the risks to Nonington. We are a small village Parish Council, with limited resources and staffed by unpaid volunteers. DDC has a full time team of professional planners and expert consultants. If we want to influence DDC's plans, **we must all object to this draft plan**.

1.3 Methodology

The LDP contains several thousand pages of well presented reports, policies and supporting information. However, there is a high level of assumption interdependency across the plan documentation. This what DDC's Traffic Consultant, WSP, call the '**uncertainty log information**' when describing the housing and employment numbers DDC provided them with. The independent Whole Plan Viability Study conducted by HDH Planning Development Ltd makes a range of assumptions including about infrastructure cost, developer contributions and delivery.

In the preparation of this report, we have also made assumptions. For example, when comparing Office for National Statistics and Local Development Plan 10 year population estimates for 2018-28 and 2020-30 respectively. This study is focused on highways and infrastructure but also considers elements of the broader plan.

1.4 Findings Summary

Listed below is a summary of key findings. The evidence underpinning these findings is detailed in the main body of this report.

1.4.1 HOUSING NUMBERS & DISTRIBUTION

- 11,920 new dwellings are proposed by DDC to meet the housing needs of the growing population in the Dover District.
- The Office for National Statistics (ONS) shows 100% of the predicted population growth in Dover over the next decade is generated by people moving into the District (net inbound migration). New housing meets this demand rather than meeting the housing needs of the existing local population.
- 71% of all 11,920 new proposed dwellings are located in 3 environmentally damaging Greenfield sites in just 2 of the District's wards:
 - 2 of these sites were housing growth centres in the previous plan. In the case of Aylesham, this has already added to traffic through the village.
 - All 3 sites have very low public transport use (5.8%) and a greater than 80% reliance on private car use according to the ONS Travel to Work Census data.
- In December 2020 DDC **reclassified Elvington and Eythorne from 'village' to 'growth centre'** to allow 350 new houses to be added to the LDP. Sustainable transport is a precondition for development but DDC's reappraisal only considered bus provision, despite ONS Travel to Work Census data for Elvington showing 95.8% of journeys were made in cars, vans and motorbikes while only 2.7% were by bus.

Satnav journey planning from Elvington sites to A2, M2, M26 and M25 picks Mill Lane and Easole Street as the quickest route. Given the 95.8% private car commuting metrics, this development will have a severe impact on the dangerous and overcrowded roads through our village.

- Should the development of Elvington proceed, the landowner DDC should achieve £400,000+ / hectare due to planning gain as well as receiving payments from the New Home Bonus Scheme.
- The LDP dwelling allocation ignores the existing settlement distribution patterns, failing to provide new housing for local people in their existing towns and villages.
 - Based on LDP assumptions, 8,435 new dwellings (71% of total) will be added to just 2 wards that had a combined population of 15,000 in 2011 (ONS Census).
 - Using current DD occupational density (2.35 / household) and LDP dwelling numbers, over 19,400 new people will be relocated into these 2 rural wards, **increasing the population from 15,000 to 35,000.**

1.4.2 TRAFFIC PLANNING

- DDC retained traffic consultants, WSP, to undertake a traffic modelling exercise to test the impact of LDP housing on the transport network. This detailed study only covered Dover and Deal. Other areas in the district were modelled in 'significantly less detail'.

- This less detailed study recognised that, as Aylesham is the 2nd largest development site in Dover's LDP, it will see '**large increases in (traffic) flow**', however, the actual data analysed was limited to ATC (automatic traffic count data) from just one road, the B2046.
- WSP's traffic impact analysis was also based on assumptions that don't survive scrutiny. E.g. all traffic to 650 new houses south of Spinney Lane will be accessed 'from B2046 via Dorman Avenue North'. The Elvington traffic evidence is even less robust. This is examined in more detail in the full report.
- North of the A256, the traffic modelling didn't include any data-based analysis of rural road capacity or cumulative traffic impacts. Neither the Aylesham s106 ATC data nor the SERTM mobile GPS data were considered in modelling Aylesham's and Elvington's traffic impacts.
- With less than 8% of Dover's population in 2011, Aylesham and Elvington have been allocated 18.5% of the proposed housing in the LDP. In contrast, Deal has a population of 30,000 (around 26% of the district total) but is allocated only 2.65% of new housing.
- Based on this review and given the scale of development and likely impact on highways capacity and safety, it is our view that the proposed Elvington and Aylesham developments fail to meet a number of 2019 National Planning Policy Framework requirements.

1.4.3 DEFINING TRAFFIC IMPACTS

- The LDP commits to 'upgrading local road infrastructure' and, in accordance with NPPF guidelines, undertakes to refuse developments that generate 'severe cumulative residual impacts in terms of capacity and road safety'. However, NPPF 2019 doesn't provide a definition of 'severe' or 'unacceptable'.
- DDC want to unilaterally decide where Transport Assessments and Travel Plans are required and to define what 'constitutes a severe residual cumulative impact' on the local highway. This is neither transparent nor accountable, providing DDC with an effective veto on all traffic issues.
- Without sufficient traffic data for this area or independent oversight the traffic impact assessment process, there is no way to prevent DDC from forcing through developments, however unsustainable or environmentally destructive they may be.

Based on the selective use of evidence in the LDP and on the documented process failures on the 2013-18 Aylesham project, we believe this issue to be the pivotal risk factor for Nonington.

1.4.4 POPULATION RELOCATING TO DOVER

- As 100% of the 10 year predicted population growth in Dover is generated by people moving into the district, we believe the cumulative impact of migration on housing delivery needs to be independently modelled to prevent poor LDP outcomes.

- Without adequate housing provision in the existing local population centres, the rise in 2nd home ownership and metropolitan lifestyle-driven relocation to the districts ‘idyllic villages to coastal towns’, will inevitably cause the dislocation of existing residents, priced out of their communities.
- London Borough social housing relocation is focused on the ‘affordable housing’ units provided on the larger ‘strategic’ development sites like those in Aylesham, Elvington and Whitfield. This could result in islands of rural poverty - a pattern seen in Cornwall’s where in expensive coastal locations are juxtaposed against high levels of deprivation and poverty concentrated in deindustrialised inland towns.

1.4.5 EMPLOYMENT MODELLING

- To be sustainable, the LDP is required to demonstrate how any large development will provide sufficient localised employment opportunities. Aylesham is the LDP’s 2nd largest growth hub. The LDP’s economic case for Aylesham’s expansion rests on the promise of over 1000 new jobs. However, there is little or no information on how these job creation targets will be delivered. Over 500 of these jobs are linked to a bee centre on the old Snowdown colliery. There no information on the business case or backers. No planning application has been made. There’s no historic data on DDC’s delivery on their employment targets for Aylesham’s expansion 2014-2021. A hairdresser, a pet shop, East Kent Recycling?

1.4.6 PLANNING REVENUE INTERESTS

- A Local Authority receives revenue for every new house built through the government’s New Home Bonus scheme. For 2019-20, DDC received £1.7 million.
- Where the Local Authority is also the landowner, (as in Aylesham 2013 and in Elvington in 2021), they benefit from the additional ‘planning gain’, the increases land value that comes with planning permission. DDC’s LDP benchmark price is £400,000/hectare on strategic development sites.
- Local Authorities also receive money from developers for infrastructure and impact mitigation measures. This is typically tied to specific planning conditions and is called the Section 106 – or s106 – funding.

Conclusion

1. This LDP is not a plan designed to provide affordable housing for local people in the towns and villages where they now live. The LDP strategy appears driven primarily by Central Government housing targets, to be delivered whatever the social or environmental cost.
2. The lack of balanced housing provision means this plan (combined with migration) will restrict access to affordable houses for young people and couples who were born and brought up in Dover’s towns and villages.
3. The continued placement of London Borough social housing overspill to ‘strategic’ Greenfield development will exacerbate existing regional inequalities and create pockets of rural deprivation.
4. Associated with high levels of car use, Greenfield sites result in “urban sprawl”, traffic congestion and pollution as locals commute from urban areas. These developments are changing the character of the countryside. They are inflicting irreversible damage on wildlife.



Faced with the severe challenges of climate change, this is the worst possible environmental solution to the housing crisis.

5. The LDP provides no costed infrastructure plan. Traffic modelling for the north of the district is patchy and insufficient for the scale of the proposed development. No empirical data on rural roads has been considered. It is unclear whether this is a deliberate omission.
6. The lack of definition of 'severe' or 'unacceptable' traffic impact is fundamentally anti-democratic, providing no checks or balances, even where the planning authority is also the landowner. The national planning system ought to protect local communities. This disempowers them.
7. The LDP's population, employment, migration and work pattern assumptions don't consider the impact of either Covid-19 or Brexit. Research on ONS data by Cambridge University's Public Policy Group point to a UK wide population decrease of 1.9% mostly affecting London. London may no longer have the shortage of homes. Changing work patterns affect housing location requirements.
8. The Local Government Association states 'local government institutions should be genuinely independent centres of decision-making and policy autonomy, able to make meaningful choices on behalf of their citizens'. Driven by central government targets, this LDP does not meet that democratic charter.

Central government is forcing housing number on local authorities and people do need housing. However, **people need the right housing in the right places.**

- In 2015, Mayor Johnson identified Canterbury, Dover and Thanet as locations to take 115,000 extra homes for London's overspill population.
- Urban population relocation from London to Dover increases pressure on the district's housing, health and educational resources. This draft LDP fails to recognise or mitigate the impact of inbound migration from London. It fails to allocate housing where it is needed. The resultant policy incoherence and inconsistencies mean the LDP that will deliver poor environmental, economic and social outcomes in the Dover district.
- In February 2021, Conservative MP Sir Roger Gale made an impassioned plea to "stop concreting over Kent", fearing that Kent has become a "dumping ground for London", with acres of valuable Kent farmland being lost to new housing built to house people from outside the area.
- Our MP, Natalie Elphicke, is the **Chief Executive Officer of the privately funded Housing and Finance Institute (HFI)**, co-founded by housing developers Laing O'Rourke and Keepmoat Homes etc. The HFI's aim is "to boost the capacity and delivery of housing". In 02/20, Elphicke was appointed as a Parliamentary Private Secretary at the Ministry of Housing, the department responsible for the controversial planning reform White Paper.

TheyWorkForYou is an independent resource that takes open data from the UK Parliament on MP's voting records considered by issue. On environmental issues, it concludes that '*Natalie Elphicke consistently voted against measures to prevent climate change*'. [LINK](#).

The full Report contains the detailed analysis of the information in the draft Local Development plan:

2.0 Report Findings

- 2.1 LDP Dwelling Numbers
- 2.2 Demographic Modelling
- 2.3 Demographic Modelling Assumptions
- 2.4 Impact of Covid-19 and Brexit on UK Population & Work Patterns
- 2.5 Transport Infrastructure DDTM - Methodology Issues
 - I. DDTM
 - II. Rural Road Network Safety & Capacity
 - III. Route mapping – DDTM Assumption Testing
- 2.6 LDP Transport Sustainability Assessment
- 2.7 DDC's Highways Network & Safety Assessment Options
- 2.8 LDP Housing Distribution Analysis
 - I. By Ward
 - II. Green / Brownfield
 - III. Dover v's Dover Urban area
 - IV. Urban Hierarchy Review Methodology
- 2.9 Socio-demographic impacts of inbound Migration on LDP

Appendix A – Q&A

- Q1 What is the Local Authority Remit?
- Q2 What is a Local Development Plan?
- Q3 What is the presumption in favour of development?
- Q4 How will the White Paper planning reforms affect us?
- Q5 Do Local Authorities have a financial stake in plan delivery?
- Q6 Online public LDP consultation engagement strategy?
- Q7 Sustainability & Environmental Impacts evidence on Greenfield v's Brownfield Development?
- Q8 Covid & Brexit – Impact on Demographic Modelling?
- Q9 Aylesham Job Creation – What are the facts?

Appendix B

Reference Sources



Evidence Source Summary

In order to prepare an effective response to the draft LDP, Nonington Parish Council have undertaken an evidence-based review of the draft LDP.

In conducting this review we have consulted a range of evidence from:

- I. DDC's draft Local Development plan
- II. The independent 'Whole Plan Viability Study' conducted by HDH Planning
- III. DDC's Housing Policy 2020
- IV. DDC's Infrastructure Policy 2020
- V. Site Allocations Policy 1 Non-Strategic Housing Allocations
- VI. The HELAA Supporting SA Note on Growth Options Topic Paper
- VII. The HELAA Local Plan Topic Paper June 19
- VIII. The HELAA Appendix 1_Draft Local Plan Structure and Scope
- IX. Strategic Housing Market Assessment - Peter Brett Associates Parts 1&2 2017 + 2019
- X. Rural Settlement Hierarchy, Regulation 18 Consultation on the Draft Local Plan December 2020
- XI. WSP-dover-and-deal-transport-model-local-plan-forecasting-report-2021

In addition to the DDC information outlined above we have also consulted a range other sources including:

- I. National Planning Policy Framework Guidance 2019
- II. Planning for the Future - Planning White Paper August 2020
- III. Planning for the Future - Planning White Paper 2020 DDC Consultation Response Nov 2020
- IV. KALC response to the Planning White Paper
- V. Strategic-Housing-Market-Assessment - Peter Brett Associates
- VI. Ministry of Housing, Communities & Local Government -Travel Plans, Transport Assessments and Statements 6 March 2014
- VII. Good Practice Guidelines: Delivering Travel Plans through the Planning Process Department for Transport 2009
- VIII. COVID-19 and commuting travel choices 14 May 2020 - Bennett Institute for Public Policy at the University of Cambridge
- IX. UK National Travel Survey (NTS)
- X. National Travel Survey: 2019 Published 5 August 2020 - Department for Transport
- XI. Office for National Statistics – UK Census data 2001, 2011 & 2019 estimate.
- XII. Office for National Statistics – Subnational population projections
- XIII. Office for National Statistics – Household projections for England: 2018-based
- XIV. Office for National Statistics – National population projections: 2018-based
- XV. Local Government Association (LGA) briefing EU (Withdrawal) Bill
- XVI. PwC – Analysis of London Population Trends 2021
- XVII. Additional sources include BBC, Kent Online,