



12 October 2015

Development Control  
Dover District Council  
White Cliffs Business Park  
Whitfield  
Dover, CT16 3PJ

Dear Sir/ Madam,

**Planning Application– Lydden Race Circuit – DOV/15/00827**

**Erection of a part two storey, part three storey spectator hospitality building, two grandstands, a two storey building comprising competitor hospitality, administration and scrutineering? facilities, 14no. two storey engineering units (Use Class B1 and B2 ), and a single storey site entrance building, formation of access road, together with associated hard and soft landscaping and drainage, retention of motor racing, and proposed use for drifting, driving schools (including beginner, advanced and police driver training), bicycle training and racing, 'track days' (including corporate and experience driving days), use for educational purposes, filming, non-driving based events (including car shows, craft fairs and hot-air ballooning) and ancillary camping**

As you will know, CPRE Kent is the Kent Branch of the Campaign to Protect Rural England which is part of the national CPRE charity. It is our objective to retain and promote a beautiful and thriving countryside that is valued by everyone and we believe the planning system should protect and enhance the countryside in the public interest for the important contribution it makes to peoples' physical and mental wellbeing, as well as its vital role in feeding the nation. It is our position that local planning authorities should seek to ensure that the impact of development on the countryside and local communities, both directly and indirectly, is kept to a minimum and that development is sustainable in accordance with national planning policy.

We have looked very closely at this application and the supporting documentation, and for the reasons we explain in this letter we consider that the application should be **refused** permission.

CPRE Kent has had regard to existing permissions on the site. It is appreciated that planning permission was given for new and replacement buildings in 2011. These, however, are of a smaller scale than are currently proposed. CPRE Kent would also like to draw attention to the legitimate expectations of the local community in regard to intensity of use on the site. The number of days available for motor racing has been carefully controlled by condition. Therefore, despite the motorcross use being in operation for a specified number of days per year, residents have taken comfort in not being disturbed by use of the circuit for the remainder of the time.

This application represents a significant and harmful intensification of use at this site. CPRE Kent is concerned that the proposal in its current form will not conserve and enhance the natural beauty of the AONB. The scale and design of the proposed buildings will be detrimental to the landscape character and visual amenity of the Kent Downs AONB and the range of uses proposed will result in a detrimental impact on both the well-being of local communities and the quiet enjoyment of the countryside. A number of points of objection are raised below:

The Kent Branch of the Campaign to Protect Rural England exists to promote the beauty, tranquility and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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### **Intensification of Use**

The application proposes a significant intensification in the use of the site. Rather than being restricted to race days, the proposal seeks permission to use the site for a number of (mostly) related, but separate uses, including driving tuition and testing, race days, craft fairs and car shows. This is a significant and undesirable change in the character of the use at the site, resulting in daily activity at the site of varying intensity.

Although CPRE Kent welcomes the reduction in the number of drift days (and the subsequent reduction in noise disturbance on those days), it is concerned that the changes proposed will result in persistent (if lower level) disturbance that will be detrimental to the amenity of nearby residents and the enjoyment and tranquillity of the AONB generally. The disturbance generated by movements of vehicles associated with additional uses is difficult to predict and would be difficult to control.

Please also note that while CPRE Kent does not doubt the intention of the applicant to reduce the number of noisy drift dates at the circuit, there are concerns that the substantial investment on the site might result in future pressure for the site to host racing events. This is set out in the section titled 'future aspirations for the business', below.

### **Traffic movements associated with access to the site**

The proposals include an extended car park that would accommodate substantially more cars than currently use the site. This, together with improved facilities and infrastructure, will inevitably mean that the race days will attract more visitors, resulting in an increase in the number of vehicle movements. Activity associated with vehicles accessing the site already detracts unacceptably from the tranquillity of the surrounding area and this impact is likely to worsen. Access issues associated with this site are severe, with queueing on the A2 and safety and operational issues associated with the lack of a cross-over to the site. New access from the A2 at Geddinge Lane may help, in part, to reduce congestion difficulties on the A2, but impacts on local roads is likely to remain, worsening on race days and at other times due to additional activities. The traffic management plan is noted. It is unclear how the access arrangements relate to future improvements to the A2 between Lydden and Dover.

The proposal to incorporate other uses on this site on non-race days will also result in significant changes in the pattern of vehicular activity and an increase in the number of vehicle accessing the site on non-race days.

Together these will result in increases in the volume of traffic on rural lanes, resulting in safety concerns and a negative impact on the quiet enjoyment of the surroundings by residents in settlements close to the site. Traffic activity associated with the use of the site harms the tranquillity of this area and its public enjoyment generally. On a limited number of times each year previous planning decisions have considered that, on balance, such harm is acceptable. Further increases in traffic levels, however, would unacceptably compound these existing impacts: further erosion of tranquillity, pressures for signage and infrastructure, increased local air pollution, increased local congestion on rural roads and detrimental impacts on settlement character.

### **Visual Impact of new and replacement buildings**

New and replacement buildings are proposed and some of these are of a significant scale. Although the Environmental Impact Assessment includes an assessment of the impact of the proposals on the landscape, CPRE Kent notes that the material provided with the application is not adequate to easily be able to make an assessment of the impact of the proposal on the landscape. A suite of viewpoints are provided in photographic form, but the proposed development has not been communicated by means of visualisations, showing how changes in views will appear.

CPRE Kent requests that, in view of the sensitivity of the landscape, and the scale and design of the proposed buildings, that the landscape and visual impact assessment includes better communication of the likely effects of the development. In the absence of evidence to the contrary, CPRE Kent believes that the proposed

buildings would have a significant and harmful impact on this sensitive landscape. This is as a result of the bulk, scale and form of the buildings and materials used.

Limited effort appears to have been made to mitigate the visual impact of the proposals. The buildings are large in scale, have a bulky outline and fail to have proper regard for changes in level within the site. Although some of the proposed buildings constitute a replacement of existing buildings, the existing buildings and stands (although not attractive) are mainly temporary and unimposing in nature. The case has not been yet made that the proposed buildings conserve the landscape.

#### **Introduction of additional employment uses**

The proposal includes a substantial building, incorporating employment units for a range of occupiers, within use classes B1 and B2. Although the proposal lists occupiers that are loosely related to the car industry, the case of need to justify this unsustainable and sensitive location has not been made. Although there is clearly a need for employment in the Dover District, there are alternative and better located sites available. The need is capable of being met elsewhere.

It is also noteworthy that the development appears to be speculative for the most part. A speculative development cannot provide a convincing argument that it has clear links and a clear need to be located close to the race circuit.

Quality of design is discussed elsewhere in this representation, but for reasons of design, scale, materials and siting the substantial building proposed would have a substantial and detrimental impact on the landscape in this locality. It would not conserve or enhance the natural beauty of the AONB and would not be in accordance with Policy DM3 'Commercial Buildings in the Rural Area' of the Dover Core Strategy.

#### **Future aspirations for the business**

The proposal indicates the intention to make substantial investments on the site, in terms of both its buildings and infrastructure. Such investment would clearly result in the income expectation for the site being much greater. CPRE Kent are concerned that this will inevitably result in future pressure for the site to expand its core business and operate a greater number of race days. Although lighting of the track is not included in this application, this would also be a logical next step for the operators to extend hours of business. No effort has been made in the submission to make the case that the business will be economically viable under the proposed uses and at the proposed scale. It must, therefore, be a concern that pressure for further intensification of uses on the site will result.

The impact of the proposal is difficult to assess due to the wide variety of the uses proposed. Indeed it is difficult to make informed judgments about significance of impacts so that informed comments on the effectiveness of mitigation can be made. For example, it is noted that Public Right of Way ER284 passes through the camping site. Access to this footpath should not be restricted, but the manner in which the organisers will resolve any conflicts with the use of the land for camping is unclear.

In conclusion, CPRE Kent does not believe that the exceptional circumstances necessary to justify this major development in the AONB exist. It is not in the public interest and it is clear that adverse impacts would significantly and demonstrably outweigh the benefits. In its decision the Council must have regard to paragraph 115 of the NPPF which indicates that great weight should be given to conserving landscape and scenic beauty in AONB's, which have the highest status of protection in relation to landscape and scenic beauty. Regard should also be had to the Countryside and Rights of Way Act 2000 which requires decisions on development proposals to have regard to the purpose of conserving and enhancing the natural beauty of AONB's. The proposal does not constitute sustainable development as a result of its sensitive and isolated rural location and is not supported by policies DM3, DM15 and DM16 of the Dover District Core Strategy 2010.

Due to the sensitivity of the landscape, in terms of overall significance the effect of the proposed development would be high, permanent and adverse. It would not, therefore conserve the landscape or the scenic beauty of the AONB. Noise and traffic nuisance would be detrimental to the tranquillity of the countryside and the amenities enjoyed by the local community.

Yours sincerely,

Jillian Barr  
Planner  
CPRE Kent