

**DOV/16/01472 - Change of use of land to a lorry parking facility. Land to Southwest of Palmerston Road, Whitfield, CT16 2HQ**

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**Whitfield Parish Council objects to the proposed change of use of this land to a lorry park.**

The Parish Council also fully supports the reasonable and justified objections by local Resident to this change of use.

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**The application is flawed and should not go to committee in its present form:**

- The application is for overnight lorry parking, yet there is no condition that the lorry park is vacated through the daytime.

During periods of delays on Channel crossings, the Park will remain full for the duration.

- The applicant's claim that the majority of the HGV's arrive from 5.00pm to 10.00pm, and leave from 3.00am to 6.00am, and the site generally clear by 7.30am is without substance. HGV's will arrive and depart according to the constraints of driving hours regulation and times booked onto the ferry.

Lorries using the facility will arrive and depart throughout the day adding to the problems on Whitfield Roundabout. An average of one HGV movement every 2 minutes.

- The applicant claims this will cure the illegal overnight parking problems in the area, and puts this forward as the justification for the application. This is unfounded speculation.

Last year 2,591,286 HGV's passed through the port - That's over 7,000 a day. For every one driver who decides to go to the lorry park, there are another ten who will not and still park on the local roads.

- The application omits the necessary mitigation measures for the environmental impacts the plan will cause.
- There are no details of contributions to infrastructure improvements for the local road network.
- There are no facilities planned for the lorry park, only to share facilities based at Priority Freight.

**The objection to the application is on the following material grounds:**

1. Disturbance and loss of amenity a lorry park will cause to nearby Residents.
2. The increase in traffic volume in the local area, especially on the Whitfield Roundabout and the feeder roads.
3. The loss of potential employment opportunities to the local area.
4. The effects on the local Water Supply, Natural Environment, Flora and Fauna.

**The details of these material objections are as follows:**

**1. Disturbance and loss of amenity a lorry park will cause to nearby Residents.**

- a) By its very nature. the activities associated with a lorry park will cause unacceptable air, noise and light pollution that will affect local Residents to varying degrees, dependant on distance, weather conditions and wind direction. There are a number of residential properties on Old Park Hill, Elysium Park, Friars Way and Pilgrims Way within 100 to 200 metres of the site and many more within 300 metres.
- b) The inevitable noise will cause unacceptable antisocial disturbance to Residents at all hours of the day and night from lorry activities and movements, their engines and refrigeration units which will cause considerable issues to the residents in the proximity.

While it may be deemed as tolerable during normal working hours, during the evening, night time and early morning, the arrival and departure of lorries, starting of engines, revving of engines, activation of air brakes, audible reversing warning devices, and continual operation of refrigeration units will be a significant intrusion to the quality of life of Residents.

Whilst a noise survey may well show the average level to be below that required for noise mitigation measures and double glazing for Residential properties to be put in place, the intermittent nature and randomness of the noise is unacceptable and will disturb sleep and other activities.

The noise and disturbance of up to 600 daily movements of HGV's to and from the site will affect the wider area of Whitfield, Old Park and Archer's Place throughout the 24 hour period, 7 days a week.

Local Residents report that, depending on the wind direction, they can hear the truck movements and refrigeration units from Priority Freight, particularly in the still of the night.

- c) The combined effects from the engine emissions of 300 additional lorries starting from cold (especially in winter) and moving around the site is unacceptable in a Residential Area

Air monitoring equipment must be installed to give real-time warnings of unacceptable levels of air pollution and a condition must be placed on the operator to immediately close the site whenever the levels are reached.

- d) The site will require floodlighting for compliance with health and safety regulations. The resultant light pollution and loss of 'dark sky' is unacceptable in a residential area
- e) Many Residents cite their reasons for choosing to live in their properties is the semi-rural nature of the area. This industrialisation of the vicinity will have unacceptable adverse consequences to the enjoyment and amenity that Residents currently enjoy in this relatively peaceful and tranquil area.
- f) The District Council rightly state in every Planning agenda that decisions must comply with the requirements of the Human Rights Act 1998, particularly Article 1 of the first Protocol, the "Right

of the individuals to the peaceful enjoyment of their possessions" (including their home). This right can only be withdrawn "in the public interest" and that it may also require positive measures to protect property to be taken.

**This application is not in the public interest and does not contain any positive measures to protect property and the owner's right to enjoy that property: it is a profit motivated scheme that will not significantly address local issues, as claimed by the applicant - so must be refused**

**2. The increase in traffic volume in the local area, especially on the Whitfield Roundabout and the feeder roads.**

- a) Whitfield Roundabout is frequently operating at capacity.
- b) While there is a need for one major truck stop serving the A2 trunk road for Port Traffic, this should be in one location, away from residential areas, which is properly served and accessed by the local road network. To have a number of smaller lorry parks in the Urban Dover Area only spreads the traffic congestion and nuisance over a wider area. This application is on the same estate as another truck stop (Priority Freight) but will have an additional capacity 3 times the size.
- c) There will be an additional 600 HGV's leaving and entering the Port Zone, putting pressure on Whitfield roundabout and all feeder roads, especially at peak times.
- d) There is already planned development in Whitfield for 5,750 new homes, 3 new primary schools, relocation of the new Leisure Centre, the new Lidl Supermarket and final development of Phase 2 of the White Cliffs Business Park. All this in addition to extra traffic already generated from the recent new retail stores and KFC Drive-in and frequent congestion caused by the refuse transfer station (which generates in excess of 66,000 vehicle movements per month), will result in increasingly frequent gridlock in the area.

**3. The loss of potential employment opportunities to the local area.**

- a) The site is on an industrial park which brings valuable employment opportunities to the District. This change of use is from use as storage and warehousing with associated operator and administration employment opportunities to a use which will require minimal staffing and is, therefore, a reduction in local employment potential which is contrary to the Local Plan.
- b) Change of use, especially without mitigation of the adverse effects on; the local Residents; traffic congestion; local biodiversity and water supplies, is contrary to Dover District Council's Core Strategy and Planning Policies.

**4. The effects on the local Water Supply, Natural Environment, Flora and Fauna.**

- a) This change of use and development will have an unacceptable environmental impact on the habitat and wildlife on the chalkland designated areas of Old Park Hill.
  - b) Any land cleared would also effect the environment as it is all protected trees and badger sets.
  - c) The site is above the catchment area for water abstraction for the public water supply for Dover. There is an unacceptably high risk of a major pollution incident from the site and the contents and loads of lorries using the site, affecting the water supply.
  - d) There are no Emergency Contingency Plans or adequate mitigation measures included in this application.
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