

Response to Draft SPD

For land at

Whitfield, Dover

for

Pentland Properties Limited

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SECTION 1: INTRODUCTION AND SCOPE OF REPORT

- 1.1 The Landscape Partnership was appointed in November 2010 by Pentland Properties Limited to undertake a review of the Whitfield Urban Expansion Supplementary Planning Document – Consultation Draft Masterplan (October 2010) produced by Dover District Council.
- 1.2 In preparation for this report we have visited the site and reviewed the following documents:
- Whitfield Urban Expansion Supplementary Planning Document – Consultation Draft Masterplan
 - Whitfield Urban Expansion Masterplan SPD – Sustainability Appraisal Scoping Report (Draft April 2010)
 - Landscape and Visual Appraisal Report (October 2010)
 - Green Infrastructure Strategy (October 2010)
- 1.3 The comments provided in this report concentrate on the following topics where they occur in the Draft SPD:
- Landscape and Visual assessment
 - Green Infrastructure
 - Open Space provision
- 1.4 The report firstly considers the objectives of the SPD concerning landscape issues, then reviews how the current phasing plan meets those objectives, and finally evaluates an alternative phasing that would help deliver a number of benefits over the phasing plan indicated in the Draft SPD.

SECTION 2: LANDSCAPE OBJECTIVES OF THE DRAFT SPD

- 2.1 The Draft SPD has been produced by Dover District Council to provide guidance for how the proposed development at Whitfield for c. 5,750 houses, together with a range of supporting services and facilities could best happen. The structure of the Draft SPD provides a logical approach to the background behind the development including: context, policy background to SPD, constraints, existing character of Whitfield and the development area, options for development infrastructure requirements and then sets forward a masterplan for the site. The SPD also includes a section indicating how the development could be delivered over time, including a proposed phasing. The SPD is also supported by a variety of Appendices in the document and a further range of more detailed studies that form part of the evidence base. The document aims to provide a link between the schematic key diagram in the Core Strategy and subsequent submissions for detailed planning applications for phases of the development.
- 2.2 The development of Whitfield through the Whitfield Urban Expansion (WUE) is supported by Policy CP 11 in the Dover District Council Core Strategy. The principle of development on the site is therefore already established. Policy CP11 sets out a number of criteria that need to be met for planning applications to be granted. It is considered that the Draft SPD should also be compliant with these criteria in CP11 to appropriately inform future applications.
- 2.3 Relevant criteria from CP11 in relation to landscape issues require that:
- i. Any application for development is preceded by, and is consistent with, a masterplan for the whole site which has been agreed by the Council as a Supplementary Planning Document;*
 - ii. The proposals relate to the whole allocated development, or if less, do not in any way prejudice the implementation of the whole development;*
 - iii. The proposals include a phasing and delivery strategy that is related to the provision of all forms of infrastructure and the creation of neighbourhood centres;*
 - vi. Existing hedgerows and tree lines are, wherever possible, retained and enhanced to form the basis of a green infrastructure network that connects with the wider network and also incorporates open spaces for recreational and other purposes, including the provision of facilities to deflect likely urbanisation and recreational pressures arising from the*

development away from the Lydden and Temple Ewell Downs Special Area of Conservation:

vii. The design creates neighbourhood centres and incorporates a landmark building and foreground buildings and creates vistas and focal points using retained trees and having particular regard to relationships with the access and transport, energy, water and green infrastructure strategies:

ix. The proposals demonstrate how the development would protect the setting of listed buildings and integrate with existing residential areas while not causing any significant adverse effect on the amenities of existing residents.

- 2.4 With regard to the above criteria, it is considered that they can be translated into the following landscape related objectives. These objectives should be met through the analysis and design process to inform a landscape masterplan, GI Strategy and in turn the overall masterplan. Thereafter the objectives should be incorporated at a detailed level into subsequent planning applications and then implemented on site:

Landscape Character

- a) Description and analysis of the existing landscape character baseline, including the developed areas of Whitfield and the adjoining rural landscapes. Integration and protection of existing landscape features, e.g landform patterns and vegetation features into the masterplan design.

Views

- b) Identification of visual context, views within, into and out of the study areas and incorporation into the masterplan.

Structural landscape

- c) Arrangement of suitable areas of structural landscape and open space in relationship with areas for existing and proposed built development.

Green Infrastructure Network

- d) Identification of the proposed Green Infrastructure (GI) network such that it provides multifunctional opportunities for:
- i. non vehicular access
 - ii. recreation, both formal and informal
 - iii. sustainable drainage
 - iv. nature conservation
 - v. cultural heritage

Protection of SAC

- e) Suitable measures for the protection of existing SAC sites near the WUE by the provision of alternative open space facilities.

Phasing

- f) Identification of a phasing plan that delivers a balanced and appropriate mix of the features a) to e) noted above in terms of location and time of delivery.

SECTION 3: REVIEW OF DRAFT SPD AND PHASING PLAN

Comments on evidence base and Masterplan

- 3.1 The Draft SPD and supporting Evidence Base, including the Landscape and Visual Appraisal and Green Infrastructure Strategy, provide a wide range of material that provides a thorough description and analysis of the landscape situation and green infrastructure opportunities. A detailed review of relevant sections of the SPD, (in respect of this report), are included in Appendix 3.
- 3.2 The separate Landscape and Visual Appraisal in the Evidence base (October 2010) generally provides a sound analysis and basis for describing the existing context of the site and locality. It also provides a number of landscape priorities that feed into the masterplan. The masterplan works with the existing local characteristics of the landscape, including the south west – north east ridges, belts of trees, hedges and woodlands.
- 3.3 The L&VA identifies there would be significant landscape and visual impacts arising from the development, including the loss of openness and amenity arising from the development. The L&VA states that this loss will be largely offset by the proposed enhancements (e.g. paras 6.14, 6.23 and 6.28) and ensure that the residual adverse effects are not significant. However the timescale at which this situation occurs is not detailed.
- 3.4 Section 7 of the Draft SPD provides a review of six different Options for the development. The selected option – 'E' is a logical choice in respect of providing a high quality and integrated green infrastructure and open space network based around distinct neighbourhoods. However the application of the red, amber, green 'traffic light' categories in Section 7 is not fully transparent. The rationale for scoring on each factor should be more fully substantiated and some of the criteria seem to be partially repeated.
- 3.5 In our view the landscape and visual impacts will not be fully mitigated in the short, medium or even long term such that the local character is preserved, as generally required by Policy DM15 in the Core Strategy. However as the WUE is an allocated site in the Core Storey the adverse impact on landscape character is compliant with Policy DM16. At Whitfield a new landscape/townscape will emerge that will be informed by and develop from the understanding of the baseline landscape character. A wide range of enhancements are proposed that will create a new landscape structure that has a number of benefits for both the local population and natural environment.

- 3.6 The three overall landscape priorities of: reinforcing local character, retention of important views into and out of the settlement and WUE and creation of a strong linked network of GI are supported and are in part illustrated on the proposed masterplan.
- 3.7 We also support the landscape objectives as set out in the Draft SPD, including reinforcing topographical and vegetation patterns. However there are aspects of these objectives that will be difficult to achieve, including:
- Incorporating the A256 into the grain of the landscape. The road cuts across the existing grain of landform. Our preferred approach option is to retain the views of both the immediate landscape and more distant landscape/sea to the east while screening road/traffic by the provision and management of intermediate height screening through scrub and smaller trees.
 - Preserving the openness to the north east of site. If areas to the northern and north west perimeter are left open the development will be more visually prominent. We consider it preferable to provide additional woodland planting to ridges of higher ground to contain development and follow the existing pattern to north west of site.
 - Retaining broad views into and out of the settlement. Key distant views from the site should be retained as a priority but they are more likely to become 'framed views' being contained by either built form or corridors of open space.
 - Maintaining the visual connection between Whitfield and Church Whitfield. The proposed arrangement of the development would seem to constrain views to the hamlet from Whitfield. It is preferable to create a new setting to the hamlet of Church Whitfield through the design of Parsonage Whitfield and use of retained rights of way.

Additional Information required to inform the Masterplan and Phasing Strategy

- 3.8 From our review of the Draft SPD there are a number of areas where additional information could and should be provided to ensure the masterplan is adequate.
- 3.9 There is concern that at Page 23 of the SPD one of the key messages identifies a tension between the objective of reflecting the existing village character and densities with the proposed WUE if a minimum total of 5,750 houses are provided. This indicates there could be pressure on aspects of the landscape and visual objectives and potentially identify development in unsuitable areas or at a higher density than is desirable to achieve the stated landscape, visual and GI outcomes. **It is recommended that density plans are produced for the various parts of the neighbourhoods in the WUE** to clearly demonstrate how the housing numbers would be provided without undue pressure on the GI and landscape and visual aspects of the scheme. This should be consolidated into an overall land budget.

- 3.10 The third bullet at Page 23 of the SPD infers the valley slopes and plateau areas are less visually sensitive and are a lower constraint on development. While this may be the case, development on the slopes will still have a major visual impact until planting matures. **It is recommended that cross sections** (long and short based on a typical layout) **should be produced to demonstrate the effectiveness of the areas of open spaces to the valley bottoms and ridges** to provide suitable mitigation of the development. This should include areas of new structure planting and allow for the shadows cast by trees to northerly aspects. The results may identify if a more comprehensive programme of advanced planting in different phases should be provided as early mitigation of the WUE as a whole.
- 3.11 The fourth bullet on Page 23 of the SPD indicates that the openness of the setting of Church Whitfield should be retained. **It is recommended that a suitable offset and the rationale for this should be tested through a range of urban design treatments** that respects the setting of the listed St Peters but also sensitively integrates the hamlet into the WUE.
- 3.12 Section 6, Table 6.1 in the SPD identifies a number of issues that should be addressed in the masterplan, including aspects of the GI network. **It is recommended that a landscape masterplan is produced to accompany the overall masterplan** in the SPD. The landscape masterplan is required to show in more detail than shown, e.g. on Fig 6.4, the arrangement for aspects of the GI provision, including open space and sports facilities. This is to ensure there is adequate provision in suitable areas and a balanced delivery of facilities is provided throughout the WUE both during the implementation and on completion. In particular, the SPD indicates that there should be an area of 10.74 ha of sports pitches associated with the development. The number of likely pitches required and locations should be included in a landscape masterplan taking into account topographical constraints. An initial assessment would indicate that 10.74ha would equate to an area equivalent to c. 7 junior and 7 senior football pitches. Another area is to ensure that the Natural England Accessible Natural Green Space Standards (ANGSt) are met in relation to semi-natural green space provision.
- 3.13 **It is recommended there should be proposals for the management and funding of the open space and GI facilities** to provide a clear structure and responsibility for open spaces, rights of way, semi-natural areas, sports pitches, SUDs, allotments, etc. The intended approach should be set out more clearly in the SPD, (including a signpost to Appendix 5 para 5.5). It is indicated that the Parish Council could have a role in the management; however the likely costs and funding sources would need agreement at an early stage to ensure viability.
- 3.14 The proposed graveyard and cemetery locations comprise two areas near Church Whitfield and a much larger area to the north of the site totalling 10ha. **The rationale for the location**

- and size of the areas indicated should be provided and alternatives considered.** The appropriateness for the use in the areas indicated shown is questioned. The provision of a 'green burial' ground is a possible feature to be incorporated and this feature could be more multi-functional.
- 3.15 An area of 2.87ha of allotments and community gardens is indicated for the development. How this satisfies any existing standards and meets any deficiencies in the area should be clarified.
- 3.16 **The proposed network of rights of way and minor lanes, including Church Whitfield Road and Napchester Road should be clarified.** The routes are indicated as alignments for secondary Roads on some of the SPD plans. These should be kept as informal non vehicular rights of way to retain the banked and sunken character which would otherwise be lost with any vehicular road 'improvements'. This approach is supported, e.g. in Para 9.98, 9.99 and 9.101 of the SPD. The location of secondary roads distinct from the retained lanes should be clarified.
- 3.17 The range of play areas is indicated at SPD Appendix 2 (page 7). However the range of play facilities seems very low for a 5,750 dwelling settlement. In particular 1 LEAP and 1 MUGA would seem a very low provision. **A review of the play provision should be carried out to ensure the proposals meet the local authority's standards.** The scope for Local Landscape Areas for Play (LLAP) in conjunction with GI facilities should also be included.

How the current Phasing Plan meets the Landscape Objectives

- 3.18 The phasing plan is provided at Picture 10.1 of the SPD, based on the Adam Urbanism drawing 5435 SK 63. The attached Appendix 2 in this report reproduces this plan and adds some numerical analysis by way of distances and areas. The following comments concentrate on how the proposed Phases 1 and 2 perform against the various landscape objectives set in Section 2 above.
- 3.19 Phase 1 is located to the south east of the site between A2, A256 and Archer's Court Road and comprises the complete neighbourhood of Light Hill. This is proposed to be the most densely built part of the WUE with typical densities of 40 dph. A further detached part of Phase 1, Phases 1a and 1b is located to the north of the existing Whitfield village. This would provide the community hub site and a primary school location. Phase 2 is currently indicated as lying north west of Archers Court Road and south west of A256 and Church Whitfield. The Phase would include the neighbourhoods of Parsonage Whitfield and Shepherds Cross.

Landscape Character

- 3.20 The masterplan as a whole reflects the underlying existing landscape character of the site. In particular, the north east – south west ridges and valley inform the grain of the development. Existing woods and tree belts, where present, are retained on high ground. Local roads and lanes which also follow the grain are retained within the structure of the development. Other ridges and valleys become parts of the landscape framework.
- 3.21 Phase 1 – Light Hill, follows the local topographical pattern with the main valley feature providing a location for a linear village green based around a network of SUDS drainage features. The local ridges are retained as landscape features with either existing belts of trees, e.g. the row of Corsican pines to the south east, wider tree lined corridors, e.g. Archers Court Road, and new planting to currently open ridges.
- 3.22 A similar principle and pattern of development would follow for Phase 2. There are few existing vegetated features to the ridges in Phase 2, but the proposals will incorporate four new belts of trees to the local ridges up to the northern edge of Phase 2.
- 3.23 The current phasing plan would deliver the proposed pattern of landscape character set out in the masterplan.

Views

- 3.24 Drawing GI-4 in the GI Strategy identifies the 'key/sensitive' views from within and out of the site. Most of these relate to views to the perimeter of the site towards and over the more open chalk landscapes. There are few distinctive views back to the existing village and indeed some of the views include raw built forms to the open countryside. Views from the wider landscape back to the village and the proposed WUE are likely to be significantly affected as the scheme develops and the mitigation matures.
- 3.25 Within Phase 1 there is a sensitive view identified along the valley feature in the centre of the site looking north east. There will be public views from the rights of way ER54, ER63 and ER71, including some views into the valley. The development of Phase 1 will radically change this sensitive view by constricting and framing it with built development and by the introduction of SUDS to the valley bottom. The width of the corridor is assumed to be c. 30-50m. In addition, the view will lead down to the new junction on the A256. Views from the North Downs Way National Trail to the east are at their closest to the WUE near Light Hill. There would be a mix of open and glimpsed views from the National Trail towards the built edge of Phase 1 beyond the A256.

3.26 There are two Identified views within Phase 2. One is an open aspect to the north east which includes distant views to the sea. The arrangement of the large area of open space to the gentle valley feature running from the existing open space in Whitfield will ensure that the distant sea views are retained. The character will substantially change with the introduction of built development to either side of the open space being framed by new development; however the introduction of planting to the open spaces will help soften the views. There is also a north east view from Shepherds Cross along Napchester Road. This would be affected by the introduction of built development; however a view line to the east is retained into the open space and beyond the A256 east of the crossroads.

3.27 The proposed phasing plan would retain, albeit considerably altered, the important views to the east. The framed view along the wider open space corridor to the sea would not begin to be formed within Phase 2 until at least when Phase 1 was substantially complete.

Structural Landscape

3.28 The WUE includes some 100ha of green infrastructure. This is allocated throughout the development but disproportionately between the phases. The approximate area of structural landscape shown on the Draft SPD Phasing plan indicates that only c. 9.2ha is provided in Phase 1 (16.6% of total) compared to 24.5ha (37.2%) in Phase 2. Subsequent Phases 3-5 also have much higher percentages of structural landscape as shown on Appendix 2.

3.29 The areas of structure landscape in Phase 1 are mainly to the perimeter of the site and typically include narrow areas c. 20 metres width. They are close to the A256 and A2 to the east and south and provide relatively less attractive opportunities for recreation, being equally important for mitigation from noise and traffic movement. There are some smaller areas that are wider but are not central to Phase 2 and act partially as a buffer to existing Whitfield.

3.30 In contrast, Phase 2 includes one to the larger significant areas of open space (Area 06 on the GI plan) and has a width ranging from 100m – over 200m. This is therefore a much more significant area of structural landscape. There are also structure planting areas to Church Whitfield, the A256 and belts c. 40-50m wide to the edge of Whitfield and to the north west boundary on a local ridge.

3.31 The provision of structure planting and open space areas is much more favourable in Phase 2 to Phase 1. The areas in Phase 2 provide much more generous areas and also areas adjacent to more sensitive uses, e.g. Church Whitfield. In contrast, the space available to Phase 1 is more restricted and provides functional separation from main roads or parts of the existing

village. It is not considered that the provision of structural landscape meets the test of criteria iii) of CP11 and could also frustrate the delivery of criteria ii).

Green Infrastructure Network

Access

- 3.32 The masterplan at Fig 9.1 in the SPD retains the existing rights of way throughout the WUE as an integral part of the scheme. It is not clear from the masterplan which routes are to be for pedestrians and which are for cycles or equestrians. The existing minor lanes, e.g. Church Whitfield Road, are generally retained as tertiary routes while others that connect to adjacent areas, e.g. Napchester Road, are still classed as secondary routes. It is important that the character of all the existing minor routes are maintained wherever possible and that alternatives are provided for vehicular traffic.
- 3.33 Within Phase 1 the existing rights of way of ER54, ER 63 and ER 71 are retained. Some of the routes, e.g. ER 71, pass through corridors of open space. However other routes, e.g. ER 54, pass in part through open space and in part through residential areas. It is not clear from the masterplan if the routes will be diverted to some degree or the development adjusted to the routes. The connections to the wider countryside as indicated on Fig 9.3 – GI Strategy Plan show the existing connections and routes for cycles and pedestrians are retained.
- 3.34 Within Phase 2 there are a number of routes, including ER63, that pass through the large area of open space, '06' and also ER62 that follows the track to Church Whitfield. The routes to the adjacent countryside are also retained through bridges or underpasses over/under the A256. These routes on balance have a greater sense of variety linking to open spaces and cultural destinations compared to Phase 1; however this is partially a function of the higher building densities of Phase 1.

Recreation

- 3.35 The GI Strategy indicates areas of provision, through diagrammatic symbols, for formal sports provision. The actual location for specific types of facilities is not shown at this stage. The total provision of over 10ha of sports fields and facilities would occupy a substantial part of some of the open spaces as discussed above.
- 3.36 Phase 1 appears to have insufficient space in the location identified on the masterplan and GI Strategy for sports pitches to the southern boundary with the A2 where the maximum width of open space is c. 42 metres. A junior football pitch would typically require a minimum of 58m width x 118m length, including run off to the sides/ends. It would seem that Phase 1 is

not able to provide the levels of sports pitch provision within the Phase itself and would rely on the provision within subsequent phases. Phase 2 has sport pitches indicated across a large part of the open space and this would be readily achievable with the widths varying from 100 – 200metres. It would seem from the areas indicated that the current phasing plan cannot deliver the full range of recreational facilities within the Phase 1 -Light Hill neighbourhood. In view of the timescale difference between the start and completion of Phase 1, this is seen as a failing of the current phasing proposals.

- 3.37 Locations for other activities, including allotments, are shown in various phases. It is assumed this would also apply to play provision. As these facilities are typically smaller and/or more flexible in their form, it is considered that the locations indicated are achievable in the current phasing plan. However suitable offsets will be required from large play areas to the nearest residential location.

Sustainable Drainage

- 3.38 The use of SUDS to contribute to the drainage of the WUE and as indicated on the masterplan is supported. However the degree to which the SUDs would meet any requirements or standards is not explained or referenced. Areas of SUDs vary within differing parts of the masterplan, e.g. Phase 1 has a chain of SUDs to a linear corridor of open space, while other areas seem to indicate a lower level of provision.
- 3.39 It is not considered that the proposed phasing plan in the SPD will affect the appropriate delivery of the required SUDS.

Nature Conservation

- 3.40 The Draft SPD and GI Strategy indicate that the proposals will work to achieve the Natural England ANGSt (see Appendix 3 P13 in SPD) and this is strongly supported. A range of GI assets and habitats will be managed, enhanced and created across the site as part of an integrated network as indicated on the GI Strategy drawing 9.3. Further levels of detail for some habitats should also be included and how the proposed features explicitly support target habitats in the Kent Biodiversity Action Plan. In particular there would be potential benefit in creating more species rich chalk grassland and scrub in addition to the woodland areas mentioned.
- 3.41 Although the areas of structural landscape in Phase 1 are smaller than in Phase 2, it would appear that the masterplan proposals within Phase 1 would meet the ANGSt for 2ha of semi-natural green space within 300m of homes, by including perimeter tree belts and SUDS systems in the valley as part of the calculation. The proposals would also eventually meet the

requirement for Phase 1 for a 20ha semi-natural green space within 2km, although the area would lie outside the Phase. However the levels of provision of semi-natural green space would only be incrementally realised as the development progresses. In particular the larger 20ha provision would only be created as part of the current Phase 2 and until this time the standard would not be met for Phase 1. The delivery of open spaces to meet the ANGSt within Phase 1, and all subsequent phases should be subject to a detailed programme of delivery to ensure there is adequate provision at an early stage for all residents.

Protection of SAC

- 3.42 There are two SACs that are close to Whitfield. The closest is the Lydden and Temple Ewell Downs SAC. The SPD indicates that no amendments are required to the scale, design, phasing and layout of the accessible greenspace within the proposals. However there are also recommendations that the greenspace for Phase 1 should be provided as one of the first elements of delivery. The ability for the narrow perimeter strips of GI, adjacent to the main roads, such that they form attractive alternatives to the SAC is questionable. The delivery of a larger area of greenspace such as area '06' – in Phase 2 at an initial stage would be a preferable strategy to ensure that the GI is effective from day one of the WUE.
- 3.43 If the GI monitoring of the SAC as required by the Habitats Regulations Assessment indicates that additional areas of alternative greenspace are required at some point mid-way through Phase 1 then there is less scope to provide this under the current Phasing Plan. Furthermore as residents at Phase 1 are given 'information packs' concerning the alternative areas of open space, they should be more attractive than the SAC. The narrow belts are considered to be of more limited appeal than a larger area such as area '06'.
- 3.44 The other SAC is Dover to Kingston Cliffs – the SPD notes there would be an increase in pressure from the residents, particularly those at Phase 1 – Light Hill on the SAC. The SPD notes that for residents of Light Hill that area '06' (one of the largest areas of new greenspace at 9ha) will be situated 'immediately adjacent to Light Hill', and that it will reduce the pressure on the SAC. However this section of the SPD portrays an inaccurate impression as area '06' is part of Phase 2 and will not even begin to be delivered until Phase 1 is substantially complete.

Conclusions on existing Phasing Plan

- 3.45 The proposed Draft SPD approach of development in sequential phases/neighbourhoods rather than in parallel is an unhelpful and unnecessary constraint and should not be part of the delivery mechanism. If followed it could limit the development of whole development if there were any delay in the Light Hill neighbourhood.

- 3.46 The indication at 6.1.2 of the SPD that Phase 1 could be treated differently in terms of layout, type, style and urban design to the rest of the WUE seems inappropriate. Changes to the Building Regulations may well come into effect before part or all of Phase 1 is approved, started or completed. A similar philosophy should apply to the whole development to set high standards of design and sustainability. It is recommended that this paragraph should be deleted or more clearly substantiated. The statement also seems to be contrary to the first two bullets in bold text in the box at section 9.1 – page 41.
- 3.47 Phase 1 – Light Hill at c. 40dph is a much denser phase of development and less likely to include the full range of infrastructure elements, including areas of structural landscape and recreational open space facilities, that are present in the scheme as a whole and also within Phase 2. The proposed phasing plan does not deliver, 'all forms of infrastructure' within Phase 1 and relies on provision from other Phases. While there are local areas of GI and perimeter planting to soften boundary features or the interface with existing houses or roads, there is a clear gap in the ability to deliver larger scale areas of GI, sports pitches and suitable attractive alternatives to the SAC.
- 3.48 Under the current proposals the first area of large scale open space between Parsonage Whitfield and Shephards Cross would only be implemented, at the earliest point, after 85% of the 1400 houses at Light Hill were built = c. 2017/18 or 7 years into the life of the development. If the open space was not implemented until Parsonage Whitfield was largely complete, then it would be even longer before the open space was laid out and became established for use, e.g. sports pitches. This would be a significant disadvantage for the following reasons:
- a) The major visible contribution that the structural GI would make through Phase 1 to the WUE in the critical early years of development would be focused on perimeter open spaces. This would have more to do with mitigation of roads and providing a buffer to Whitfield than creating new areas for multi-functional enjoyment at the heart of the development. The perimeter areas would appear as left over buffers rather than attractive features at the core of the development. This omission could as a consequence reduce the attractiveness of the development and overall progress of the development in terms of completions and sales.
 - b) Existing Whitfield residents would have limited benefit from the new areas of open space as they are more physically detached.
 - c) There is no/limited opportunity to provide larger scale sports facilities in Phase 1 to either meet the needs from the new population or the current deficits in the village,

e.g. a cricket pitch. There would be a considerable delay before the facilities are provided in Phase 2.

- d) There is limited scope in Phase 1 to provide larger scale open space alternatives for neighbouring SACs to adjust to potential adverse impacts from additional public pressure.

3.49 As a result of the above, it is considered therefore that the development will not be, 'in the right place at the right time'.

SECTION 4: ALTERNATIVE PHASING PROPOSALS

- 4.1 The existing proposals for phasing are based around the approach to work sequentially anticlockwise around the WUE. While the argument for a more geographically contained area to restrict the visual impact on adjacent areas has some logic at face value, there are also strong reasons why an alternative phasing scheme should be considered.
- 4.2 The Draft SPD phasing proposal would potentially prejudice the proper delivery of the whole scheme. The proposed development in sequential phases/neighbourhoods rather than neighbourhoods in parallel is an unnecessary constraint and should not be part of the delivery mechanism.
- 4.3 The proposed alternative phasing approach is illustrated at Appendix 1. This shows development in three neighbourhoods of Light Hill, Parsonage Whitfield and Shepherds Cross. The number of units for a revised Phase 1 would be similar to that within the Draft SPD proposal. The alternative would deliver a new primary access road link at an early stage from the A256 to the Sandwich Road where the new community hub as proposed in the Masterplan to the north of existing Whitfield is located. The proposal would also allow for the delivery of one of the major areas of strategic open space within the expanded community at an initial stage. Development would occur over a wider physical area than for the proposal in the Draft SPD but at a lower overall density than proposed in the Draft SPD in Phase 1 at Light Hill. This is in part due to the more extensive areas of open space and structural landscape provided in the alternative. There would be visual impact on neighbouring areas, (as would also occur in the Draft SPD proposal) in the short to medium term during construction phases, however alternative Phase 1 would include all areas of structural landscape necessary to soften the interface with existing Whitfield, the A256 and Church Whitfield. It is proposed that all the structural landscape elements should be programmed for early delivery within the alternative Phase 1.
- 4.4 From the prior review of the existing phasing proposals in the SPD for Phase 1 and Phase 2 the alternative phasing would have the following notable advantages:
- a) Scope for multiple starts from different developers. This would help deliver structural landscape and GI over a wider area. There would be clear benefits in implementing some of the structural tree belts indicated in the GI Strategy at an advanced stage, e.g. the belt to the north of Shepherds Cross bordering the Napchester valley and also the areas adjacent to the A256.

- b) An early road link with new community hub to the north of Whitfield providing enhanced direct connection with all phases of the development.
- c) Establish sustainable patterns of movement by walking and cycling, within the development and also to the existing village and new community hub.
- d) Early provision of a large area of open space (area '06' on the GI Fig 6.4) which would be a major benefit as it would:
 - i) Set an early benchmark standard for large scale and high quality GI at the visible heart of the WUE. This would encourage investment and the profile of the WUE.
 - ii) Encourage community pride and involvement in the management of the open spaces.
 - iii) Provide a full range/showcase of GI facilities including: semi natural areas, allotments, community gardens, play areas and SUDS, all within a major area of open space and linked to existing facilities and rights of way.
 - iv) Redress existing deficits in sports facilities in Whitfield, e.g. cricket pitch.
 - v) Provide new sports pitches and associated facilities on site to fully meet current standards as the scheme progresses.
 - vi) Provide an asset for existing residents of Whitfield with direct links to existing areas of public open space in the village that fosters community integration.
 - vii) Retain the wider views to the north east, including views to the sea, from the village and new open space.
 - viii) Provide substantial areas of semi-natural open space to contribute towards Natural England's ANGSt.
 - ix) Provide a generous suitable alternative for the local SACs to ensure that shortfalls do not occur mid way through a phase.
 - x) Enable an early solution in the life of WUE for the interface between Church Whitfield (in conjunction with open space '07' in the GI Strategy) and a new landscape framework as part of a new sympathetic built character to reflect the hamlet's character. This would have benefits for nature conservation, outdoor learning, place making, etc.

4.5 It is considered that the alternative phasing will ensure that a full range of facilities will be provided at Phase 1 as required by Policy CP11 and in particular criteria iii). The alternative will also be fully compliant with other criteria in CP 11 including vi) on retention of existing landscape features, delivery of GI and will be an advantage over the Draft SPD on the protection of the SAC. With regard to criteria vii), the layout will be equally able to deliver vistas and focal points through urban design and landscape design of the GI network, including protect and frame the more significant distant view to the east through the open space '06'. The alternative will also satisfy criteria ix) in regard to the setting of St Peters Church Whitfield.