

**Representations on behalf of Pentland Homes Ltd,
In response to the Whitefield Urban Expansion Supplementary
Planning Document - Consultation Draft Master Plan (October 2010)**

November 2010

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1. These representations are submitted on behalf of Pentland Homes Ltd, in response to the Whitfield Urban Expansion Supplementary Planning Document – Consultation Draft Master Plan (October 2010)
2. The Dover District Local Development Framework Core Strategy was adopted on 24th February 2010. The Core Strategy identifies Whitfield as a location for major urban expansion.
3. Policy CP11 relates specifically to the 'managed expansion of Whitfield' and states:

"The site to the west, north and east of Whitfield is allocated for an expansion of Whitfield comprising at least 5,750 homes supported by transport, primary education, primary health and social care, utility services and green infrastructure together with retail, financial and professional offices, eating and drink establishments (use Classes A1 to A5)."

4. The Policy goes on to identify 9 criteria which must be met before planning permission will be granted. Consequently, the provisions of the Whitfield Urban Expansion Supplementary Document should reflect the criteria set out in Policy CP11.
5. In addition to Policy CP11, paragraph 1:19 of the Consultation Draft SPD invites views on the following issues:
 - 1 Has the character of existing Whitfield been accurately assessed in chapter 5?
 - 2 Have the right assessment criteria (table 6:1) been identified?
 - 3 Are the development options and the identification of Option E as the Preferred Option, reasonable? (chapter 7)
 - 4 How well do the proposals safeguard existing Whitfield and the

setting of the listed buildings?

- 5 Is the proposed phasing arrangement (figure 10.1) reasonable and workable?
- 6 Has the Master Plan struck a reasonable balance between providing a firm framework for developing and considering planning applications, and the need for flexibility over a long implementation period?
6. Pentland Homes Ltd has concerns that the emerging Supplementary Planning Document is deficient in terms of its evidence base and options testing. Furthermore, the plan fails to identify a phasing delivery strategy that is related to the provisions of all forms of infrastructure and the creation of neighbourhood centres – a key requirement of Policy CP11.
7. The phasing arrangement proposed in figure 10:1, appears to have been influenced by landownership, rather than a framework to ensure the implementation of the whole development and the provision of strategic infrastructure, together with social and community facilities.
8. The Consultation Draft Master Plan SPD does not incorporate a comprehensive Infrastructure Plan or a framework to demonstrate how and when phased infrastructure provision will be funded and implemented. Key infrastructure provision should be identified to reflect phasing and trigger points and cost estimates and funding proposals incorporated, to demonstrate deliverability and economic viability of any phasing strategy.
9. Of particular concern is the suggestion at paragraph 10:31 that the 'Delivery Mechanism' will be determined through a Section 106 Agreement for each phase. Furthermore, any Section 106 Agreement negotiated in respect of phases 1 and 1A will effectively create a template to be reused for subsequent phases this approach is clearly unrealistic.
10. Appended to these representations are the following documents, which supplement Pentlands reservations and alternative phasing strategy:

- 1 An alternative Phasing Plan.
- 2 Representations on the Transport Strategy prepared by DHA Transport.
- 3 Representations on Strategic Landscaping and Green Infrastructure produced by the Landscape Partnership.
- 4 Representations regarding Strategic Infrastructure Delivery prepared by WSP.
- 5 Urban design response prepared by Rummey Design

11. The alternative Phasing Plan at Appendix 1 proposes as an integral element of Phase 1/1a, the delivery of the spine road from a new junction on the A256 to the Sandwich Road to the north of Whitfield. It will delivery approximately 1,600 dwellings, a sustainable urban drainage system, strategic landscaping and green infrastructure, a primary school and community hub.

12. This alternative phasing strategy is superior to that proposed in the emerging SPD for the following reasons: -

- 1 The provision of the spine road from the A256 to the Sandwich Road will link development with the proposed primary school and community hub.
- 2 Phase 1/1a will create a critical mass to support the viability and vitality of the community hub and primary school.
- 3 The resultant highway network will facilitate the early implementation of a bus rapid transport service to encourage 'modal shift' at an early stage of the whole development.
- 4 The predicted traffic flows can be accommodated satisfactorily on the surrounding highway network.
- 5 The alternative Phase 1 development will facilitate significant green infrastructure and reduce potential adverse impacts of the

development on neighbouring SAC's.

6 The completion of the link road from the A256 to Sandwich Road will ensure that subsequent phases are implementable and deliverable.

13. The benefits outlined above are amplified in the supporting representations prepared by DHA Transport, The Landscape Partnership WSP and Rummey Design at Appendices 2, 3, 4 and 5 respectively. Those representations assess the emerging SPD against the provisions of Core Strategy Policy CP11 and respond to the issues identified at paragraph 1:19 of the SPD.

14. The draft SPD cannot be considered 'sound' particularly in respect of the evidence base which does not demonstrate that comprehensive options testing has been carried out to provide justification for the draft Master Plan being consulted upon.

15. Furthermore, the emerging SPD is deficient in so far as it fails to demonstrate that the proposed phasing arrangement is reasonable and workable. The proposed phasing programme does not demonstrate a Delivery Strategy related to the provision of all forms of infrastructure and the creation of neighbourhood centres and its present form would prejudice the implementation of the whole development.

16. The alternative Phasing Strategy proposed by Pentland Homes Ltd, addresses the deficiencies identified above and demonstrates a phasing arrangement that is reasonable and workable and will not prejudice the implementation of the whole development. It is related to the provision of all forms of infrastructure and the creation of neighbourhood centres and includes a number of developer/landowner interests which will ensure a coordinated, fair and equitable early phase with shared infrastructure, facilitating subsequent phases related to the provision of strategic infrastructure, resulting in the managed expansion of Whitfield to achieve the Local Authorities Core Strategy vision.