

# **Whitfield Parish Council, Whitfield Action Group and Community Liaison Group response to Whitfield Draft Masterplan and Supplementary Planning Document Consultation – October 2010**

**Submitted by: Cllr Jeff Goodsell – Whitfield Parish Council**

## **Summary:**

The urbanisation of Whitfield is contrary to the wishes of most people in and around Whitfield, who chose to live in the Village for its semi rural aspect and its pleasant character. However, if the development is to proceed it is vital that the Supplementary Planning Document (SPD) is fit for purpose and sets out a framework that future planning applications will be decided upon.

The detail normally expected in a Supplementary Planning Document Masterplan is not contained within these documents. There are many examples of SPD Masterplans that have sufficient detail to satisfy the concerns of local residents and ensure sustainability and consistency of the development. The hurried pace of this process for Whitfield has resulted in the vagueness found in these consultation documents.

Too much detail is being left for future planning applications. The present Outline Application for Phase 1 and 1a appears to be lacking important detail which will, therefore, be left for 6 or more detailed applications which may in turn be approved with the important details being deferred as reserved matters or delegated for approval outside of the planning committee. There must be a requirement that planning permission will only be granted once all the criteria and requirements have been fulfilled by each application, to ensure transparency of the decisions that will be made.

It is unclear if the documents contained in the Evidence base, and their conclusions and recommendations, are a binding part of the SPD Masterplan or are simply reference documents that are not binding. The SPD lacks clear summaries of the options identified in the evidence base.

Lack of commitment for the provision of social, community and healthcare infrastructure and facilities are a major concern to the community. The proposed late delivery of infrastructure and facilities is unacceptable.

It must be recognised that the community are simply asking for the continuation of the present level of service: The community are not asking for improved facilities (swimming pools, bowling alleys or multiplex cinemas). Contrary to claims made in these documents, other publications and by officers at DDC, there is no benefit or gain what so ever for Whitfield's Residents from the creation of an expanded Whitfield over the course of the development timescale. Three times the population with three times the primary schools and other community facilities (all of which will be delivered too late – after significant development has taken place) is not a benefit, it is merely catching up with what we once had. Three times the traffic and the urbanisation of a semi rural village with the loss of surrounding countryside is actually a significant loss and to the detriment of the Residents of Whitfield.

The Masterplanning process has been too hurried and the resulting SPD consultation document in its present form is unacceptable to the Residents of Whitfield and should not be adopted by DDC

To summarise, the main areas of objection are:

- The Masterplanning process has been fast tracked to meet arbitrary completion targets by the developers.

If the urbanisation of Whitfield is to take place, the preparation of the Supplementary Planning Document and subsequent planning applications must not be rushed. The whole Masterplanning

process so far has taken just 6 months. The current schedule to have the Masterplan agreed and adopted by Dover District Council as a Supplementary Planning Document in less than a year is too quick – especially when compared to the longer time allowed for the process for much smaller developments in the District.

Important documents in the evidence base, especially relating to social infrastructure needs and timing of provision, are either missing or not yet completed and, subsequently, are not available for public consideration.

- The SPD does not contain sufficient detail and safeguards to ensure that the SPD fulfils its role as the document that gives consistency to the numerous planning applications that will be made over the next 20 years.
- The SPD does not contain sufficient detail and safeguards that will ensure the proposed development is properly supported by infrastructure (as defined in paragraph 8.1) that is delivered when needed by the community. This should not be dictated by viability, budgetary constraints, the present low house prices, or be influenced by the present economic situation.

The schedule proposed in the SPD is for provision after significant development: This is too late: Early provision is essential.

The present provision in the SPD is not supported by available evidence to justify or explain the current proposals for infrastructure provision or the schedule for delivery. This fact prevents proper comment on and scrutiny of the proposals. This is contrary to the requirements of ODPM Circular 05/2005 - Planning Obligations.

The current developer contributions and provision of infrastructure proposals fall well short of KCC published guidelines and DDC have yet to prepare their own Developer Contributions SPD.

The speed at which the process has moved has resulted in a situation where important infrastructure cannot be delivered when it is needed, for example, the first school is required within the first 100 or so house completions, but KCC procedures take 4 years from S106 agreements being signed for the school to be ready for use.

This SPD cannot and must not be approved until such time that the evidence that supports the proposed social infrastructure need and trigger points for its provision is made available for public scrutiny and comment as part of this consultation.

- The SPD does not contain sufficient detail and safeguards that will ensure that effective measures are in place to control and mitigate increased traffic volumes generated from the development.

Much of the detail and commitment for proper control and monitoring of the increased traffic that was part of the previous stage of the Masterplanning process is now missing from this consultation document. The Transport Strategy (September 2010) in the evidence base gives a general framework, but does not make specific requirements and detail for traffic management. It is also not clear if the Transport Strategy is a binding part of the SPD or if it simply puts forward recommendations and feeds into the SPD.

The degree of participation of the local community in the future traffic management is also unclear.

- The SPD must contain sufficient detail and safeguards that ensure that disruption to the Residents of Whitfield is minimised. The requirement for Control of Construction Process is not contained within the SPD. Undoubtedly a development of this scale will have an impact not only on the physical environment but on the lives of the existing and new community. It is important that during this time the impact of the construction process is limited. As such, a number of measures must be contained within the SPD.

The SPD must contain requirements for the development to achieve certification from the Considerate Constructors Code (CCC), or similar scheme, through adherence to the scheme's Code of Practice and to; minimise and control any nuisance arising from construction traffic; minimise and control noise, pollution and other environmental effects from construction to ensure that the construction works do not adversely affect those living in the surrounding areas; require full and regular consultation with a Local Liaison Group to ensure that local people are kept fully informed about all aspects of the work and have the opportunity to discuss any operational matters and to establish a complaints mechanism to ensure that any concerns raised are properly addressed.

- There is no mechanism or contingency to control the rate of growth at Whitfield in relation to other elements of the Core Strategy. The development must not be allowed to race ahead simply to fulfil housing targets of DDC or developer profits. It has to be carried out as a planned project to benefit the whole district and to ensure it is not to the detriment of Dover Town.

The SPD must contain sufficient detail and safeguards that ensure the expansion of Whitfield is in balance with Brownfield development, development and regeneration in Dover Town and with new employment creation.

The present situation where projects for the regeneration of Dover Town are stalled and uncertain and the new employment in the District as forecast in the adopted Core Strategy are unlikely to be achieved. The majority of new employment forecast (51%) was to be from Government and Financial Services, which is unlikely in the present economic circumstances.

The progress of development at Whitfield must be regularly reviewed against these factors to ensure balance is maintained, to achieve the stated objectives and requirements of the Core Strategy and South East Plan.

Attached are the detailed comments on the SPD and associated documents from Whitfield Parish Council, Whitfield Action Group and Whitfield Community Liaison Group.

## **Whitfield Parish Council, Whitfield Action Group and Community Liaison Group response to Habitat Regulations Assessment Consultation Draft Masterplan – October 2010**

### **Object.**

This document should carry out a similar assessment on the effects of this development on the existing population of Whitfield.

It is undoubtedly important that the natural environment is assessed for adverse effects from the development of Whitfield, but it is equally important that the 4,500 existing Residents of the Parish of Whitfield should have the same degree of consideration, as the development will affect their daily lives in their own homes and in the community in which they live.

The loss of the surrounding countryside, flora and fauna and the loss of the semi rural aspect of Whitfield is unacceptable. There will be more than 20 years of disruption from construction and ever-increasing traffic congestion along with increased air, noise and light pollution.

The quality and effectiveness of local community services and facilities will reduce in proportion to the progress of the development: The provision is underfunded and will be delivered too late under the present terms contained within the SPD. Children will have to travel across the district to distant primary schools, further increasing Whitfield's carbon footprint and traffic congestion.

The lack of any sign of new local employment will inevitably mean that any new residents will have to travel out of the district to work, a large proportion of which will use their cars.

Lack of progress of development and regeneration within Dover Town will inevitably mean increased road traffic by people driving to Thanet, Ashford and Canterbury for non-food shopping and employment.

If the high number of houses allocated to Dover District does significantly increase the population as planned, there will be a proportional increase in usage and adverse affects on the sites examined in this document, which is not accounted for.

There is clear evidence that this document should be cautioning against early large-scale development of Whitfield!

## **Whitfield Parish Council, Whitfield Action Group and Community Liaison Group response to Sustainability Appraisal (SA) Consultation Draft Masterplan – October 2010**

### **Object.**

The SA does not assess the inevitable adverse effects that development at Whitfield will have on Dover Town.

The Town's regeneration should lead the overall programme for the District, with Whitfield being developed when new employment has actually been created and moved into the District and once Brownfield sites in the Town have been utilised for housing.

To develop Whitfield before employment and regeneration in the Town will have a significantly adverse affect on Dover. People from Whitfield will work and shop out of the District, which will do little to support Dover Town: This scenario will have great negative effects on Dover: The more affluent people will move from the town to Whitfield, selling up to 'Buy to Let' landlords, increasing the relative deprivation and poverty in the Town.

This in turn will do little to attract retail and leisure business to the town, nor will it attract port users to visit or spend in Dover.

Development at Whitfield will do very little to enhance or support Dover's regeneration and recovery.

The SA does not assess the underfunding or late delivery of community infrastructure and facilities for Whitfield that are currently proposed in the SPD.

If Whitfield is to be developed then it needs to be supported by adequate, properly funded and timely provision of all aspects of community infrastructure and facilities.

There are major concerns, regarding the Section 106 contributions that KCC are negotiating with the developers' to provide community facilities at Whitfield.

There is no document in the evidence base that gives the detailed background on which the negotiations are based and an explanation of why the current proposed development contributions fall so far short of the provision outlined in the KCC document, from the KCC web site '*KCC guide to development contributions and provision of community infrastructure*'.

For example, there is currently no provision planned for a library for Whitfield; however, the KCC Guide for library provision clearly states that "*The Kent standard for a new standalone library is that it should serve a distinct community of at least 5,000 people*". Whitfield's population of 4438 (2001 census) and is set to rise to over 18,000. The proposal is to improve the discovery centre in Dover, some 4 miles away, while Whitfield gets nothing.

The library contribution rate per dwelling in the KCC Guide is £227. This equates to £1,305,250 for 5,750 dwellings. The current contribution has been negotiated down to just £470,000 and this not to be spent within Whitfield.

In addition to the present 2-form entry primary school; Whitfield is to receive 3 new 2-form entry primary schools. The proposed timing for the provision of primary schools for the development is too late. A new school is needed at the beginning of the development (or at least by the completion of the first 50 dwellings – due in 2013)

The present primary school is full. There is a waiting list for children in Whitfield to get a place at the school. Many children are forced to attend other schools across Dover. New residents in the Archer's Place development (300 dwellings) cannot get children into their local school. We are now told that the first school will not be built until at least 2016, after occupation of the first 620 dwellings and the second school will not be built until at least 2023 (after occupation of 2,520 dwellings).

It is also stated in the SPD that most of the other community facilities will not be provided until at least 2023. The negotiated sums for all these also fall well short of the sums shown in the KCC Guide to Development Contributions:-

Youth Facilities: Guide amount £3,669,813 - slashed to just £1,500,000

Adult Education Facilities: Guide amount £1,035,000 - slashed to just £260,000

Adult Social Services: Guide amount £6,905,750 - slashed to just £450,000

This is just not acceptable. Over the last 4 years we have always been told that if the housing was to be built at Whitfield, the community would be provided with adequate and timely community infrastructure.

The process has to be open and be based on robust evidence and reasoned arguments.

There is similar uncertainty about the provision of Doctors and other health service provision.

If Whitfield is to be developed then it needs to be supported by adequate, properly funded and timely provision of all aspects of community infrastructure and facilities or the development cannot be classed as sustainable.

## **Whitfield Parish Council, Whitfield Action Group and Community Liaison Group response to Supplementary Planning Document (SPD) Consultation Draft – October 2010**

### **General Comment on SPD – Object.**

The urbanisation of Whitfield is contrary to the wishes of most people in and around Whitfield, who chose to live in the Village for its semi rural aspect and its pleasant character.

If the urbanisation of Whitfield is to take place, the preparation of the Supplementary Planning Document and subsequent planning applications must not be rushed. The whole Masterplanning process so far has taken just 6 months: The current schedule to have the Masterplan agreed and adopted by Dover District Council as a Supplementary Planning Document in less than a year is too quick – especially when compared to the longer time allowed for the process for much smaller developments in the District.

The whole Masterplanning process has been rushed at an accelerated pace dictated by arbitrary targets set by the developers (50 houses completed by 2013). The Outline Planning Application for Phase 1 and 1a of the development is currently being prepared by the developers with a public exhibition held early in November.

Important documents in the evidence base, especially relating to social infrastructure needs and timing of provision, are either missing or not yet completed and, subsequently, are not available for public consideration.

### **Response to DDC questions on Page 4 – Para 1.19**

#### **1. Has the character of existing Whitfield been accurately assessed in Chapter 5?**

No.

While the basic assessment of facts is correct, ‘developer spin’ has crept into the chapter to suit and justify the intent of the developers and DDC in overdeveloping the Village.

Paragraph 5.9 says we do not have a well defined centre, what we have suits us and functions quite well, thank you.

Paragraph 5.14 describes a suburban character. Semi Rural is how we would describe Whitfield, and that is why most of us chose to live here.

Paragraph 5.32 is incorrect. Newlands has a mix of houses (detached, semi detached, chalet and bungalows)

The Key Messages – paragraph 2 is incorrect. The existing dwelling mix of Whitfield is not limited. Whitfield has a wider variety of housing types than most settlements and does not need thousands of houses to foster the creation of a sustainable and cohesive community, we have this already.

Whitfield would like some affordable housing specifically for the use of Whitfield People and people with a connection to Whitfield in perpetuity, but this is not dealt with anywhere in this document.

Development of Dover’s Brownfield sites can more than adequately meet the needs of Dover. Whitfield is not part of Dover.

#### **2. Have the right assessment criteria (Table 6.1) been identified?**

Yes, but unfortunately the remainder of the document does not assure the proper funding and timely provision of this infrastructure.

### **3. Are the development options, and the identification of Option E as the preferred option, reasonable? (Chapter 7)**

An alternative option, Option G – “do not develop Whitfield” would be the best option, but if the development is to take place, then option E (with the green infrastructure as shown in fig 9.3) is the best option that is offered by this document.

### **4. How well do the proposals safeguard existing Whitfield and the setting of the Listed Buildings?**

1/10 – poor effort. It is not understood how the building of so many dwellings and a few trees can protect the settings or not have any significant effect on residential amenity [pleasantness (of a place, person, etc.)], as required by Criterion 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.”*

### **5. Is the proposed phasing arrangement (Figure 10.1) reasonable and workable?**

Yes, providing that “FIGURE 10.1” is actually referring to “PICTURE 10.1” as shown on page 57 of the SPD and that the requirements of paragraphs 10.10 and 10.11 are adhered to.

This is the only phasing arrangement for such a large development that is practical. It ensures a minimum period of construction disruption for each part of the Village and prevents sporadic development in all areas around the village. The SPD also identifies that this enables efficient provision of utilities and infrastructure and their early delivery. (Although the timings of the community facilities need to be brought forward from the schedule in appendix 2)

### **6. Has the Masterplan 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?**

No.

If the urbanisation of Whitfield is to take place, the preparation of the Supplementary Planning Document and subsequent planning applications must not be rushed. The whole Masterplanning process so far has taken just 6 months: The current schedule to have the Masterplan agreed and adopted by Dover District Council as a Supplementary Planning Document in less than a year is too quick – especially when compared to the longer time allowed for the process for much smaller developments in the District.

The detail in the SPD is lacking in many areas.

Outline planning applications will be required for each of the 6 neighbourhoods (6 separate applications), these will then be split into developments of 200 to 250 dwellings and detailed planning applications will be required for each of these (approximately 23 separate applications), detailed applications will also be required for each village extension (4 separate applications). This is 33 planning applications! To have a degree of consistency across the development there needs to be far more detail at this stage.

Issues such as the adherence of all developers to the Considerate Constructors Code should be included in the SPD so that it is an automatic requirement for all developers throughout the life time of the planned development. Without inclusion of this important addition to the SPD, we will have to fight this battle with each developer as they put in their application. No doubt, some will willingly adopt this,

but others may not. Without the requirement being put into the SPD it is not certain that DDC Planning Committee will add this as a condition to each application.

Any flexibility that is required later on in the plan period can be addressed by the annual monitoring scheme and / or by the developers at planning application stage by showing that circumstances have significantly changed that warrant deviation from the SPD.

### **3.2 – Object**

This statement is simply not true.

The paragraph states: *“One of the key pieces of this Evidence Base is the bespoke demographic forecasting undertaken for the Whitfield housing development by Kent County Council. The demographic forecasting took into account the type and size of dwellings to be built at Whitfield and the impact that the new expanded population of Whitfield will have on the need for new services and facilities.”*

Examination of this document, downloaded from the DDC website, shows that the document is in fact simply a demographic forecast based on educated guesswork and assumptions. It DOES NOT take into account *“the impact that the new expanded population of Whitfield will have on the need for new services and facilities.”*

The impact that the new expanded population of Whitfield will have on the need for new services and facilities has not been assessed in this or any other document publicly available in the evidence base.

Nowhere in the evidence base does DDC give this information, which is crucial for setting the social infrastructure need and trigger points for its provision, and for assessing the required section 106 contributions and other funding sources to provide these facilities.

05/2005 ODPM Circular on Planning Obligations states that the principal objective of the planning system is to deliver sustainable development, through which key Government social, environmental and economic objectives are achieved. The delivery of these goals is provided for in a framework of development documents, in which local communities are positively involved, and through a transparent system of decision-making on individual applications. It also requires that the process of setting planning obligations policies and negotiating planning obligations should be conducted as openly, fairly and reasonably as possible and members of the public should be given every reasonable assistance in locating and examining proposed and agreed planning obligations which are of interest to them.

The lack of this information in the evidence base does not fulfil the aims or requirements of this Circular. The Local Community has not been positively involved, the system is not transparent and the public cannot, therefore, locate or examine the proposals.

This SPD cannot and must not be approved until such time that the evidence that supports the proposed social infrastructure need and trigger points for its provision is made available for public scrutiny and comment as part of this consultation.

### **3.4 – Object**

The SA does not assess the inevitable adverse effects that development at Whitfield will have on Dover Town.

The Town’s regeneration should lead the overall programme for the District, with Whitfield being developed when new employment has actually been created and moved into the District and once Brownfield sites in the Town have been utilised for housing.

To develop Whitfield before employment and regeneration in the Town will have a significantly adverse affect on Dover. People from Whitfield will work and shop out of the District, which will do little to support Dover Town: This scenario will have great negative effects on Dover: The more affluent people will move from the town to Whitfield, selling up to 'Buy to Let' landlords, increasing the relative deprivation and poverty in the Town.

This in turn will do little to attract retail and leisure business to the town, nor will it attract port users to visit or spend in Dover.

Development at Whitfield will do very little to enhance or support Dover's regeneration and recovery.

The SA does not assess the underfunding or late delivery of community infrastructure and facilities for Whitfield that are currently proposed in the SPD.

If Whitfield is to be developed then it needs to be supported by adequate, properly funded and timely provision of all aspects of community infrastructure and facilities.

There are major concerns, regarding the Section 106 contributions that KCC are negotiating with the developers' to provide community facilities at Whitfield.

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The present primary school is full. There is a waiting list for children in Whitfield to get a place at the school. Many children are forced to attend other schools across Dover. New residents in the Archer's Place development (300 dwellings) cannot get children into their local school. We are now told that the first school will not be built until at least 2016, after occupation of the first 620 dwellings and the second school will not be built until at least 2023 (after occupation of 3225 dwellings).

It is also stated in the SPD that most of the other community facilities will not be provided until at least 2023. The negotiated sums for all these also fall well short of the sums shown in the KCC Guide to Development Contributions:-

Youth Facilities: Guide amount £3,669,813 - slashed to just £1,500,000

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Adult Social Services: Guide amount £6,905,750 - slashed to just £450,000

This is just not acceptable. Over the last 4 years we have always been told that if the housing was to be built at Whitfield, the community would be provided with adequate and timely community infrastructure.

The process has to be open and be based on robust evidence and reasoned arguments.

There is similar uncertainty about the provision of Doctors and other health service provision.

If Whitfield is to be developed then it needs to be supported by adequate, properly funded and timely provision of all aspects of community infrastructure and facilities or the development cannot be classed as sustainable.

### **3.6 – Object**

Representatives from Whitfield Parish Council, Whitfield Action Group and Community Liaison Group may have represented the views of the Local Community, but the community facilities envisaged as part of the overall development do not meet or reflect the wishes of the Representatives or of the Whitfield Community and fall well short of local expectation and KCC guidelines contained within the “KCC guide to development contributions and provision of community infrastructure” to support this development.

There is no benefit or gain to Whitfield’s Residents from the creation of an expanded Whitfield over the course of the development timescale.

3 times the population with 3 times the primary schools and other community facilities (all of which will be delivered too late – after significant development has taken place) is not a benefit, it is merely catching up with what we once had. Add to this 3 times the traffic and the urbanisation of a semi rural village and it is actually a significant loss and detriment for the Residents.

### **4.0 Habitat Regulations Assessment - Object.**

The Habitat Regulations Assessment Consultation document should carry out a similar assessment on the effects of this development on the existing population of Whitfield.

It is undoubtedly important that the natural environment is assessed for adverse effects from the development of Whitfield, but it is equally important that the 4,500 existing Residents of the Parish of Whitfield should have the same degree of consideration, as the development will affect their daily lives in their own homes and in the community in which they live.

The loss of the surrounding countryside, flora and fauna and the loss of the semi rural aspect of Whitfield is unacceptable. There will be more than 20 years of disruption from construction and ever-increasing traffic congestion along with increased air, noise and light pollution.

The quality and effectiveness of local community services and facilities will reduce in proportion to the progress of the development: The provision is underfunded and will be delivered too late under the present terms contained within the SPD. Children will have to travel across the district to distant primary schools, further increasing Whitfield’s carbon footprint and traffic congestion.

The lack of any sign of new local employment will inevitably mean that any new residents will have to travel out of the district to work, a large proportion of which will use their cars.

Lack of progress of development and regeneration within Dover Town will inevitably mean increased road traffic by people driving to Thanet, Ashford and Canterbury for non-food shopping.

If the high number of houses allocated to Dover District does significantly increase the population as planned, there will be a proportional increase in usage and adverse affects on the sites examined in this document, which is not accounted for.

There is clear evidence that the Habitat Regulations Assessment should be cautioning against early large-scale development of Whitfield!

## **5 – Whitfield Today – Object**

Unfortunately, this section contains a number of factual errors which are due to either the hurried way in which this document has been prepared, a lack of understanding and knowledge of those who have prepared it, or a combination of both.

### **Landscape Conclusions – after 5.48 – Object**

A requirement for early planting of the green infrastructure / buffer zone to screen the existing dwellings and Village from development before its construction must be added to this summary and the final SPD. It would not be acceptable to have the development to run in parallel to, or in advance of these areas being planted.

A requirement must be added that the Green Infrastructure is protected from future development in perpetuity, whatever the final management provisions for these areas. If it is genuinely the intention to have the Green Infrastructure provided as a “Country Park” such long term protection is essential.

The requirements for, or examples of, the network of pedestrian and cycle routes within and around the expanded settlement should be shown on the maps as these are important features of the overall development area and need to be controlled for all phases. This is an important function of an SPD Masterplan.

## **6.2 – Object**

This paragraph must be amended to give safeguards for the spacious character of the existing built area by restricting future ‘Backland Development’ planning applications, so preventing the associated increase in housing density. Such infill and garden development within the existing built area is no longer acceptable. The character of Whitfield will change with the planned urban expansion outside of the village confines the existing Village and will lose more of its character if the present trend of back-garden development continues, increasing the housing density of the existing Village.

### **Table 6.1 – Comment**

These issues will be commented on later in this submission (appendix 1).

## **6.7 to 6.43 – Whitfield Highways Access Optioneering Report – Object**

The SPD is devoid of any real detail on transport management that will ensure effective measures are in place to control and mitigate increased traffic volumes generated from such a large development. This section is very long and ‘wordy’ and does not have any real substance in its content: There are no clear conclusions or specific requirements summarised within the section or elsewhere in the SPD.

Much of the detail and commitment for proper control and monitoring of the increased traffic that was an integral part of the previous stage of the Masterplanning process is now missing from this consultation document. This document does not contain requirements for Transport Infrastructure Contributions, Transport Management Fund, Vehicle Monitoring Scheme, Traffic Management Plan, or Transport Coordinator that were features of the earlier Masterplanning process in the previous SPD Consultation Draft and the earlier Pre-Publication Copy – V2 (ref RA/5435) – both dated October 2010.

The Transport Strategy (September 2010) in the evidence base gives more detail and a general framework, but does not contain specific requirements and detail for traffic management. It is also not clear if the Transport Strategy is a binding part of the SPD or if it simply puts forward recommendations and feeds into the SPD's rather vague coverage of the transport issues.

It would appear that the traffic predictions are currently in a very early stage of its evolution and consists of continuation of trend rather than reliable modelled forecasts. Much of the work has been done using the option 1 VISUM model that assumes TEMPRO growth in Dover to 2026 with no development at Whitfield. The detailed VISSIM model is apparently in the development stage.

Reliance is, necessarily, being put upon more detailed modelling being done at the planning application stage for each phase and a monitoring scheme being put in place to fine tune and trigger traffic infrastructure provision and traffic management as required.

The monitoring must commence prior to first occupation, not after the 575<sup>th</sup>, so that an accurate base line is established that includes construction traffic as well as traffic generated from the development. (Construction traffic will be a daily reality for 20 years and should be taken into account as traffic generated from development).

Managing traffic, targets and review of traffic volumes need to be open and transparent and the community representatives must be fully involved throughout this process, from the outset.

The degree of participation of the local community in the future traffic management decisions must be defined in the SPD.

A number of measures are included that will affect the present population of Whitfield. Further consultation is required with the Community Liaison Group before these are agreed.

### **A256 Access**

This access position and form is generally acceptable.

However, this access must be in place for all construction traffic from the start of construction. Works access from A256 must be available from the start of construction for use by all construction traffic and the new roundabout completed for public use before 1<sup>st</sup> occupation of new housing.

All construction traffic must be kept out of the existing Village road network.

### **A2 Access**

This access must only be brought forward when required for access to the later phases of development as scheduled in Section 10 – Delivery and Implementation.

The form of the junction and position are generally acceptable, but the final position and layout must minimise the impact on residents of Green Lane. Early provision and planting of screening and noise reduction measures must be a requirement of this SPD.

### **Sandwich Road / A256 junction – North of Whitfield**

Closure of the right turn into Sandwich road will necessitate all the present traffic for Whitfield travelling onwards, via the A2, to Whitfield Roundabout to enter the Village from the south, thus increasing traffic volume on Whitfield Roundabout and through Whitfield. This measure will also increase journey times and length.

A significant amount of traffic from Eythorne and Elvington will not use the Barville Roundabout onto the A256, but will travel through Eythorne Village, causing an unacceptable increase in traffic usage through Eythorne, and travel to Whitfield via Kennel Hill and the Sandwich Road (original A256 route) - minor country roads, which are narrow with poor street lighting.

Improvements to this junction must be assessed and implemented prior to the 1700<sup>th</sup> / 2200<sup>th</sup> trigger points currently suggested in the SPD.

Closure / partial closure of the right turn at the Sandwich Road / A256 junction will increase traffic through other parts of Whitfield to gain access to north Whitfield. Early provision of a roundabout is preferred – not implementation ten years hence, during 2020. Full consultation with the Parish Council is required before any decision is made on this.

Full closure is not an option.

### **Whitfield Roundabout**

There is great controversy to the effectiveness of roundabout signalisation, with much anecdotal evidence that traffic flows better when installed signalling is not in operation. This is a view strongly supported by The Association of British Drivers.

Preference is for the development not to add to the traffic volume on the Whitfield Roundabout. Too much reliance is being placed on the signalisation scheme to solve all the problems.

Specific targets for acceptable traffic volume increase must be set, and be publicly available, so that effectiveness of mitigation and control measures can be assessed.

The traffic monitoring must commence prior to first occupation, not after the 575<sup>th</sup>, so that an accurate base line is established that includes construction traffic as well as traffic generated from the development. (Construction traffic will be a daily reality for 20 years and should also be taken into account, added to traffic generated from development).

Evaluation of effect on Whitfield Roundabout must be from the first planning application and all subsequent planning applications.

The VISSIM assessments must continue throughout the development period and should not be discontinued after signalisation of the roundabout as stated in paragraph 6.26. It must not be assumed that once this scheme is implemented, no further evaluation is required.

### **Other parts of the local highway network**

Detail and location of traffic calming and bus gates are simply labelled as “to be agreed” on figure 6.5. More detail and the requirements for these must be added to the SPD with a commitment to fully involve the local community in the final decisions to be made.

Bus gates and traffic calming schemes must be designed to achieve the requirements of preventing new development traffic from using existing local road network of Whitfield, while not interfering with the present access of the existing Residents.

Details of the traffic calming scheme for Archers Court Road are required in the SPD for comment.

It is agreed that a bus gate should be sited adjacent to Archer’s Court Road to prevent traffic from Phase 1 gaining access to Archer’s Court Road. This bus gate must not be sited on Archer’s Court Road, especially when Phase 2 development commences as this will cut the road link between Whitfield, and Church Whitfield, Pineham, Langdon, Guston and other settlements to the East of Whitfield.

At the initiation of Phase 2 development, an alternative scheme for preventing new development traffic from using Archer's Court Road and the Whitfield Roundabout must be designed and implemented.

The alternative layout and arrangements recently agreed with Napchester Road Residents for closing the road and providing a turning area at the end of the present built area must be added to the SPD.

Residents of Singledge Lane and West Whitfield must be consulted and their wishes taken fully into account for the traffic calming scheme for that area.

Details, or the broad principles, must be included in the SPD.

### **6.36 – Object**

While there is support for an improved and quicker bus service to Dover, there is need to improve and increase the public transport system to Canterbury, Thanet, Deal and Folkestone.

Regrettably, it is a fact that Dover has a limited catchment area and has always been unattractive to department stores and other non food shops and retailers. At present, Dover has no major retail stores in the Town, so it is also a fact that the population does and will continue to travel to Canterbury, Thanet, Folkestone and Ashford for non food shopping requirements. The expansion of Whitfield will increase car travel (and road congestion) to these retail areas unless improved bus services are a part of the considerations for public transport.

These bus services will also be required for travel out of the District for employment. It is a case of simple mathematics that the Core Strategy provides for 14,000 new homes and only 6,500 new jobs. While the high speed rail service will serve commuters to London, Ashford and Maidstone, many of the new and existing population will be employed in East Kent.

The services can be reduced if Dover Town eventually attracts retail sufficient and employment to reduce the out commute to work and shop.

## **8 Expanded Whitfield: Overall Infrastructure Requirements**

### **8.1 – Object**

The document only deals with the initial provision of community facilities and does not guarantee commitment from the service providers that the necessary management regimes or funding are in place to ensure the continued upkeep or the efficient and effective long-term arrangements for the services.

### **8.2 – Object**

The Manage and Invest approach is not relevant to many of the social and community infrastructure aspects of this section.

Delivering efficiency through the better use of existing infrastructure is not relevant as the primary school, doctor's practice and other health and social care services are already oversubscribed. Immediate provision of additional capacity is required and is the only option.

Reduction of demand through promoting behavioural change for these services is not a practical option; it is certain that the population will continue to age, have health and social problems and will require education.

Library facilities have been withdrawn from Whitfield and must be reinstated for the expanded population.

Providing additional capacity by extending or providing new infrastructure is the only realistic approach to most of these services all of which must be provided within Whitfield.

### **8.3 – Object**

The background evidence justifying the requirements for the high level infrastructure requirements is not in the evidence base and is, therefore, not available for scrutiny or comment.

The details of consultation with the appropriate service providers (including Kent County Council and the Eastern and Coastal Kent Primary Care Trust) to set the level of infrastructure and its delivery must be open and transparent, and must be available for comment.

### **8.4 – Object**

This SPD must give the requirements for all aspects of infrastructure (as defined in para 8.1) so that the numerous individual planning applications conform to these requirements and are consistent and controlled.

This is especially important as there will be many developers and constructors involved throughout the development life time.

It is expected that outline planning applications will be required for each of the 6 neighbourhoods (6 separate applications), these will then be split into developments of 200 to 250 dwellings and detailed planning applications will be required for each of these (approximately 23 separate applications), detailed applications will also be required for each village extension (4 separate applications). This is 33 planning applications. To have a degree of consistency across the development there needs to be far more detail at this stage.

The level of infrastructure provision and the timing of the delivery are not currently supported by any available evidence and cannot be justified. It is a legal requirement that the whole process must be transparent and must involve the local community. The whole issue is very subjective, but it is a fact that the current levels of developer contributions fall well short of the current KCC guidelines on this subject and it is our opinion that the proposed delivery schedule is not timely and the infrastructure will not be provided when it is needed.

### **8.5 – Object**

Whatever arrangements are made for the coordination and provision of utility infrastructure, there must also be a requirement for:

- i. The provision to precede each development phase.
- ii. To ensure all works are carried out without interfering with or cutting supplies to the existing community.
- iii. To ensure no loss of gas or water pressure, or voltage reduction to the existing community.
- iv. To ensure all works are carried out without any disruption or inconvenience to the existing community.
- v. Cables to be provided underground within the development area.
- vi. That any substations or similar permanent structure are screened and sited away from the existing built area.

- vii. Each Utility Company to fully evaluate the requirements for upgrading and adding to their current systems to ensure adequate and timely provision of Utility Services.

### **9.1 – Object**

The Whitfield Development Objectives as listed are broadly supported; however, additional objectives should be added to this list:

- That infrastructure provision should be early and not require interim off-site provision for education, healthcare and social services.
- That construction is properly controlled to minimise disruption to the existing Residents. There should be a requirement for the development to achieve certification from the Considerate Constructors Code (CCC) scheme (or similar scheme), through adherence to the scheme's Code of Practice.

### **Fig 9.1 – Object**

The traffic calming detail and location should be specified and the likely effect should be assessed.

The way the plans seem at present, St Peters and Church Whitfield could well eventually be isolated when the road barrier that appears to be proposed along Archers Court Road and eventually the one in Napchester Road are in place. By closing these roads to through traffic it is also restricting access to the other villages like Pineham, Guston, East and West Langdon and several others to the East of Whitfield.

### **9.4 and 9.5 – Object**

A requirement for early planting of the green infrastructure to screen the existing Village from development before its construction must be added to the SPD. It would not be acceptable to have the development to run in parallel to, or in advance of these areas being planted.

A requirement must be added to the SPD that the Green Infrastructure is protected from future development in perpetuity, whatever the final management provisions for these areas are agreed. If it is genuinely the intention to have the Green Infrastructure provided as a "Country Park" such protection is essential.

### **SPD compliance with Policy CP11 – 9.6 to 9.27 – Object**

The overall requirement for the development to be supported by infrastructure provision has not been achieved by the content of this document. Detail of this deficiency is dealt with elsewhere in this Consultation response

There must be a requirement that planning permission will only be granted once all the criteria and requirements have been fulfilled by each application. Important details should not be deferred as reserved matters or delegated for approval outside of the planning committee to ensure transparency of the decisions that will be made.

### **Criteria i, ii, iii**

These requirements are not addressed by this SPD. Too many issues and detail are left to planning application stage, which may in turn be deferred as reserved matters. The provision of infrastructure is totally inadequate.

#### **Criteria iv.**

The transport strategy is not detailed in the SPD. See comments to 6.7 to 6.43. Footpaths and cycle routes are not shown in the SPD.

There is unnecessary ambiguity on the Park and Ride requirement, resulting in housing blight (Blight being the situation where land is being allocated for some form of public function and has a detrimental effect on the value of a property -Town and Country Planning Act 1990). This needs to be tied down rather than the unsatisfactory 'potential broad location' alluded to in this and other documents. If land has to be allocated to this use, probably at the A2 junction near to Green Lane, allocate the prescribed area of land to the west of this junction, plant it up as meadow and screen with trees and hedgerows so if and when it is used, the impact will be minimal.

Further information is required to specify the circumstances that will require the Park and Ride to be located at Whitfield.

#### **Criteria v.**

More detailed information is required on the Energy Centres.

Safeguards should be written into the SPD to ensure that the centres are acceptable to Residents. The whole issue of on-site energy generation has only recently been revealed and, as yet, details are very vague. Future government policy may affect the requirements, but initial reaction is that on-site Biomass micro-generation, anaerobic digestion plants and wind turbines are likely to be unacceptable to the general population.

Importing waste from rest of Dover District is not acceptable.

#### **Criteria vi.**

Despite repeated requests, there is still little information on the green infrastructure in this document. These areas should be consistent throughout the development and the requirements and basic principles should, therefore, be contained within the SPD

Early planting of the green infrastructure areas is essential so that these areas are established prior to construction, providing an established screen for the existing properties in Whitfield.

Green infrastructure areas must be protected from future development and /or loss in perpetuity by Deed of Covenant and Tree Preservation Orders.

#### **(9.16)**

Woodland areas and tree screening should be used throughout the development, on all phases.

#### **(9.18)**

More detail is required on type of outdoor sports facilities, recreation and play areas and for the management arrangements.

#### **(9.20)**

Extra car parking facilities should be included for St Peter's Church.

## **Criteria ix.**

It is not understood how the building of so many dwellings and a few trees can protect the settings or not have any significant effect on residential amenity [pleasantness (of a place, person, etc.)], as required by this criteria, or the amenities [services and facilities] will not be affected, given that significant population growth is planned before the trigger points for infrastructure provision are reached, causing a local shortage of these amenities.

This requirement has not been achieved by the SPD

The principles for treatment of listed buildings are defined, but listed buildings and their setting should be treated more sympathetically in this SPD.

Buildings are listed because they and their setting are considered to be important to National Heritage. It is essential that the setting and visual connection of the 3 listed building and additional 4 previously listed buildings to the West of Whitfield be protected by the SPD.

The current wording has not gone far enough or been prescriptive enough to afford them this protection. The plan will have a significant effect on the visual connection and setting of the 3 listed buildings. A larger buffer of open space should be planned around the Listed Buildings, pushing the development area back much further, especially between Temple and Singledge Farms. This line of development should then be edged with a buffer of mature woodland and trees to screen the impact of development on the existing setting.

The Village extensions also require sensitive treatment as they are likely to have most impact on the existing dwellings.

4 out of the 5 extensions are limited to maximum 2-storey buildings. The exception to this is the Hub extension where, in part, 3 or 4 storey buildings are proposed. While it is reasonable to have residential above small retail to maintain densities, it would be preferable to have the Hub extension treated the same way as others and limit to a total height of 2-storey, including the boundary between this extension and the new primary street. There are very few, if any, 3-4 storey buildings in the existing village and the concept of the extensions is to replicate the style and feel of the existing village.

### **9.30 – Object**

Extensions to existing settlement need sensitive treatment as they are likely to have most impact on the existing dwellings.

4 out of the 5 extensions are limited to maximum 2-storey buildings. The exception to this is the Hub extension where, in part, 3 or 4 storey buildings are proposed. While it is reasonable to have residential above small retail to maintain densities, it would be preferable to have the Hub extension treated the same way as others and limit to a total height of 2-storey, including the boundary between this extension and the new primary street. There are very few, if any, 3-4 storey buildings in the existing village and the concept of the extensions is to replicate the style and feel of the existing village.

### **9.33 – Object**

#### **Backland development**

This paragraph must be amended to give safeguards for the character of the existing built area by restricting future 'Backland Development' planning applications, so preventing the associated increase in housing density. Such infill and garden development within the existing built area is no longer acceptable. The character of Whitfield will change with the planned urban expansion outside of the

village confines the existing Village and will lose more of its character if the present trend of back-garden development continues, increasing the housing density of the existing Village.

#### **9.64 – Object**

The naming of the phases must be in consultation with the local community. This is a long-standing request that has been repeatedly ignored by both DDC and the Developers.

#### **9.81 – Object**

Trees should be planted along the boundary with both the A2 and A256 to aid visual screening from these busy roads and to reduce noise nuisance

Tree species should include the Scots Pine and other native species such as Rowan and Oak. The SPD should not restrict the range of vegetation without a full study and consultation being carried out.

#### **10 – Object**

The Delivery and Implementation section must include requirements that ensure disruption to the residents of Whitfield during construction is controlled and minimised.

The requirement for the control of the construction process is not contained within the SPD. Undoubtedly a development of this scale will have an impact not only on the physical environment but on the lives of the existing and new community over a 20 to 30 year period. It is important that during this time the impact of the construction process is limited. As such, a number of measures must be contained within the SPD. The SPD must contain requirements for each phase of the development to achieve certification from the Considerate Constructors Code (CCC) scheme (or similar scheme), through adherence to the scheme's Code of Practice.

The additional Development Principle must include measures to:

- Take action to minimise and control any nuisance arising from construction traffic by using measures such as controlling vehicle speeds, wheel washing of HGVs upon departure from the site, controlling times and routes and keeping all site entrances clean.
- Minimise the impact of construction traffic on surrounding neighbourhoods and road network by careful on-site management and reducing the need to import/export materials/spoil.
- Provide a dedicated haul route for construction and delivery traffic visiting the site throughout the construction period with a view to minimising impact on adjacent communities.
- Provide a management framework within which construction traffic is segregated from residents/employees' traffic as the development progresses.
- Put in place management procedures and working methods such as CCC scheme covering matters such as noise, dust and pollution to ensure that the construction works do not adversely affect those living in the surrounding areas. This must be managed through a formal Construction Environmental Management Plan.
- Set up a Local Liaison Group comprising the relevant Site Managers and representatives of local residents and the Local Authorities to ensure that local people are kept fully informed about all aspects of the work and have the opportunity to discuss any operational matters.
- Establish a complaints mechanism to ensure that any concerns raised are properly addressed, in line with the 'Accountable' section of the CCC.

### **The Considerate Constructors Code (CCC) scheme's Code of Practice includes:**

- Consideration: All work to be carried out with positive consideration to the needs of all potentially affected parties and the environment in general.
- Environment: Minimising noise from construction, use of local resources where possible, attention to waste management, avoidance of pollution and encouragement of recycling.
- Cleanliness: The working site to be kept clean and in good order at all times.
- Good Neighbours: Full and regular consultation with neighbours including adjacent traders and businesses regarding programming and site activities.
- Respectful: Respectful and safe standards of dress shall be maintained. Lewd or derogatory behaviour will not be tolerated under threat of severe disciplinary action.
- Safe: Construction operatives and site vehicle movements are to be carried out with great care and consideration for the safety and security of the general public and site personnel.
- Responsible: Considerate Constructors will ensure that all site personnel and any other persons working on the site understand and implement the obligations of the Code.
- Accountable: Posters relating to the scheme will be displayed around the site, giving names and telephone numbers of staff who can be contacted in response to issues raised by the general public or other persons affected by the site operation.

### **10.2 – Object**

The phasing programme is only supported if the infrastructure is delivered at the right time for the community. This document does not comply with this requirement at this time.

The conditions set out in paragraphs 10.10 and 10.11 must also be strictly adhered to.

### **10.5 – Object**

The list of key points from the public consultation is inaccurate and appears to be deliberate spin and distortion.

The key points, if listed, should be a full list, not ones picked out to support the content of this document.

The key points that have been a recurring theme throughout all stages of the consultation process and exhibitions have included lack of infrastructure and community facilities and their late delivery, widespread increase in traffic (not just the roundabout), construction disruption, overlooking and crowding of existing properties, increase crime rate, development at Whitfield before Dover and Brownfield sites being wrong, no employment to support development, continued opposition to housing on this scale, etc etc.

See Statement of Community Engagement (July 2010).

### **10.20 – Object**

The facilities in the District Centre are not due until later in the overall programme of development. Phase 1a simply allocates land (and an empty building) for future use.

### **10.21 – Object**

Many community facilities and services are at capacity now. Provision is required in tandem with initial occupation, not at the times planned in the SPD.

### **10.29 – Object**

The trigger points for community infrastructure are as initially proposed by KCC and are not justified by any information currently available in the evidence base, or elsewhere. These trigger points must not be the basis on which future planning applications are based until full and transparent consultation has taken place with the local community.

### **10.32 and 10.33 – Object**

The development of Whitfield should not be managed in isolation. It is one project that is part of a complete programme for Dover District, as set out in the Core Strategy. All the various projects in the District are interrelated and should come forward together. It is a requirement of the Core Strategy and the Government Inspector's Report, that Whitfield's development should be balanced with development in Dover Town and other parts of the District and that it should be balanced with new employment growth.

The SPD contingency planning and monitoring and Dover District Annual Monitoring Review should reflect this.

- The SPD must show how it relates and interacts with all the other Masterplans and Regeneration Projects that support the Core Strategy and is in accordance with the Planning Inspector's Report.
- The SPD must ensure that development in Whitfield does not undermine the successful regeneration of Dover.
- The SPD must contain mechanisms for regulating housing development at Whitfield to be in balance with Dover Town and employment growth and must be clarified and be transparent.
- Safeguards must be in place in the SPD to ensure that relatively cheap and problem-free Greenfield land is not used before available Brownfield sites in the District.

### **10.34 – Object**

There should be a requirement for an overall Management Plan for the development contained within the SPD.

It would be unacceptable and unworkable for negotiations to take place and agreements having to be made for each individual detailed planning application, for each parcel of development of 200 to 250 dwellings, with numerous development companies. It is important that there is an overall management arrangement, especially with the green infrastructure, to ensure consistency, quality managements and longevity.

As an absolute minimum, agreements for management arrangements must be made for each of the 5 phases at the outline application stage.

We have an opportunity to create something that could be a valuable asset for the community.

The Parish Council wish to assess the option to adopt the Green spaces, community facilities, allotments, recreation areas and sports facilities, but have concerns that the whole process is moving too quickly and the detail required to do this is not available, despite continued requests.

It will be a major commitment by the Parish Council. The Parish Council must be given the time and support to consider the viability of this option. There is a danger that time will run out and that there will be the wrong decision or no decision at all.

### **Appendix 1 - Environmental and Utility Considerations - Object**

While full reports on the utility service requirements are available, there is no such evidence available for the Community Infrastructure, Services and Facilities.

Comment on the infrastructure provision outlined in this Appendix 1 is made elsewhere in this response and in detail in the comments for Appendix 2.

### **Noise**

Detail is required for the noise mitigation measures that will be provided. The development area is surrounded by major roads which are destined to become busier with a proportional increase in noise levels and nuisance.

Any tree planting that is required must be planted early, so that it is mature planting and, therefore, effective by the time the houses are built.

### **Appendix 2 Infrastructure Requirements – Object**

If Whitfield is to be developed then it needs to be supported by adequate, properly funded and timely provision of all aspects of community infrastructure and facilities.

- There are major concerns, regarding the quality, quantity, location and timing of this provision.
- The Evidence Base is devoid of the details required to justify the provision as set out in these tables. The process has to be open and be based on robust evidence and reasoned arguments

The infrastructure requirements do not cover all aspects of infrastructure as defined in paragraph 8.1 of this document.

- Requirements for Police and Fire and Rescue Service are missing from this table. A requirement is needed, even if discussions are ongoing.
- It is not clear if the details of necessary management regimes and funding for KCC and Healthcare services are in place, to ensure efficient, effective and long-term arrangements for running costs and continued upkeep. Provision of a health centre is no good if the funding for necessary services is not provided, or if provision of the services is set for 10 years after the building is in place.
- These tables omit contributions to the wider Districts' infrastructure. These contributions need to be listed as they will have a direct bearing on the amount of contributions developers will be willing to make for Whitfield based infrastructure.

For example, there is no mention of any contribution to the transport fund that was set in the earlier stages of the Masterplanning process at £2,000 per dwelling with an initial payment of £100,000.

Contributions for offsite recreation grounds and parks and to the Dover Sports Centre are not specified. There is no mention of provision for further and higher education, acute care and general hospitals, ambulance services or waste management and disposal.

As previously stated in this response, the level of provision falls well below the provision outlined in the KCC document, from the KCC web site 'KCC *guide to development contributions and provision of community infrastructure*'.

From information received during the Masterplanning process, the actual amounts are less than the amounts in this guide:

- Youth Facilities: Guide amount £3,669,813 - slashed to just £1,500,000
- Adult Education Facilities: Guide amount £1,035,000 - slashed to just £260,000
- Adult Social Services: Guide amount £6,905,750 - slashed to just £450,000
- Library Services: Guide amount £1,305,250 - slashed to just £470,000

The guide states that "*The Kent standard for a new standalone library is that it should serve a distinct community of at least 5,000 people*". Whitfield's population of 4438 (2001 census) and is set to rise to over 18,000. The proposal is to improve the discovery centre in Dover, some 4 miles away, while Whitfield gets nothing.

### **Table 2.1 Infrastructure required to serve the whole of the WUE area – Object**

This table has mistakes with the trigger points. For example 2023 is linked to both 2,520 and 4,500 residential units.

### **Transport – Object**

Much of the detail and commitment for proper control and monitoring of the increased traffic was an integral part of the previous stage of the Masterplanning process, but is now missing from this consultation document. This document does not contain requirements for Transport Infrastructure Contributions, Transport Management Fund, Vehicle Monitoring Scheme, Traffic Management Plan, or Transport Coordinator that were features of the earlier Masterplanning process in the previous SPD Consultation Draft and the earlier Pre-Publication Copy – V2 (ref RA/5435) – both dated October 2010.

### **At grade roundabouts from A2 and A256 – Object**

The A256 roundabout is required specifically in 2011 prior to Phase 1 occupation.

The A2 roundabout is not required until at least 2023, after Phase 2 construction or even 2029 after Phase 3. It should not be included in 2011 to 2016 timing.

The Sandwich Road / A256 junction, to the North of Whitfield is not included in this table. Why?

Traffic management for Whitfield Roundabout is not included in this table. Why?

Other parts of the local highway network are not included in this table. Why?

### **Land for Dover Park and Ride System – Object**

There is unnecessary ambiguity on the Park and Ride requirement, resulting in housing blight. Further information is required to specify the circumstances that will require the Park and Ride to be located at Whitfield.

### **Bus Rapid Transit (BRT) System – Object**

While there is support for an improved and quicker bus service to Dover, there is need to improve and increase the public transport system to Canterbury, Thanet, Deal and Folkestone due to expanded population shopping and working out of the District. See comments to Paragraph 6.36.

This requirement needs to be assessed and added to this table.

The services can be reduced if Dover Town eventually attracts sufficient retail and employment to reduce the out commute to work and shop.

### **Affordable Housing – Object**

Provision should be made for Whitfield Residents' housing needs and allocation. A proportion of the affordable housing should be specifically for use of local people in perpetuity. Whitfield has the same problems as smaller villages in that our children cannot afford to buy locally and move away. It is important for the village to retain its young people to maintain balance and sustainability in Whitfield.

A housing needs survey has been carried out and the results must be taken into account in the provision made.

### **Primary Education – Object**

It is agreed that three 2-form entry schools will be required, but the trigger points are far too late.

Provision of primary school places should be from early delivery of new schools in Whitfield, not filling capacity at other schools around the District. Provision of the first primary school after 620 dwellings in 2016 is too late. Policy CP6 requires a mechanism to ensure provision at the time it is needed. There is a current shortfall in primary place provision in Whitfield, so arguably there is need for a primary school now.

On the basis of the evidence provided, the first 620 occupations will generate 146 primary age children. If local provision is not provided, these children will predominantly be taken to school by car. Primary aged children will not travel unaccompanied and parents will be unlikely to endure a return journey to school and back, on public transport, twice a day.

The associated increase in car usage will add to congestion at peak times, increase Whitfield's carbon footprint and is contrary to the recently published 'Planning for Climate Change'.

Development should not be permitted until this major issue is resolved satisfactorily.

There will be similar problems with the second and third primary schools. These also should be provided at a time when capacity is reached for existing schools in Whitfield.

### **Secondary Education – Object**

*(Note:- 2023 or 4,500 residential units appears to be a mistake and should be 2,520 residential units)*

Provision of 244 extension places at 2023 or 2,520 residential units is too late.

At this time 387 children aged between 12 and 18 will have been added to the population. Even if 244 places are sufficient to accommodate these children, there is no indication of the measures to be taken to accommodate the increase during the 12 years leading up to this trigger point.

### **Adult Education – Object**

Provision at 2023 or 2,520 residential units is too late. There is no indication of measures to be taken to accommodate the increasing need for Adult Education in the 12 years to this trigger point.

### **Health Centre Provision – Object**

Early provision of this is fully supported, but more detail is required on the provision, timing and funding of services to be provided at this centre.

The whole range of health care is required to support an increased and aging population: There is little detail of its provision in this SPD.

### **Children's Social Services – Object**

Provision at 2023 or 2,520 residential units is too late. There is no indication of measures to be taken to accommodate the increasing need for Children's Social Services in the 12 years to this trigger point.

### **Kent Adult Social Services (KASS) – Object**

Details need to be clarified and a firm commitment to continuing and adequate provision has to be part of this SPD. It is of concern that current facilities will be oversubscribed before the new facilities and services are in place in 2023.

It should be noted that Whitfield, in common with other parishes in Dover District, have recently lost the facilities afforded by Manley House and Cornfields with no replacement.

### **Green Infrastructure – Object**

Despite repeated requests, there is still little information on the green infrastructure in this document. These areas should be consistent throughout the development and the requirements and basic principles should, therefore, be contained within the SPD

Early planting of the green infrastructure areas is essential so that these areas are established prior to construction, providing an established screen for the existing properties in Whitfield.

A requirement must be added that the Green Infrastructure is protected from future development and /or loss in perpetuity by Deed of Covenant and Tree Preservation Orders, whatever the final management provisions for these areas. If it is genuinely the intention to have the Green Infrastructure provided as a "Country Park" such protection is essential.

More detail is required on type of outdoor sports facilities, recreation and play areas and for the management arrangements.

Extra car parking facilities should be included for St Peter's Church.

### **Youth centre – Object**

There does not appear to be provision for 2011 to 2017.

The temporary provision for 2017 to 2022 is inadequate for the 166, increasing to 350, youths aged 12 to 18 that will have been generated by 2,280 dwellings.

## **Libraries – Object**

KCC document, 'KCC *guide to development contributions and provision of community infrastructure*' states that "The Kent standard for a new standalone library is that it should serve a distinct community of at least 5,000 people". Whitfield's population of 4438 (2001 census) and is set to rise to over 18,000.

The 2008 Planning Act sets out legal tests for the validity of Sec 106 agreements, including that the obligation must be 'directly related to the development' and 'fairly and reasonably related in scale and kind to the development'. Given that Whitfield fulfils the KCC policy for provision of its own library, we consider that the proposal to spend the money 4 miles away in Dover is highly questionable.

Library facilities must be provided in Whitfield

## **Utility Services – Object**

Whatever arrangements are made for the coordination and provision of utility infrastructure, there must also be a requirement for:

- i. The provision to precede each development phase.
- ii. To ensure all works are carried out without interfering with or cutting supplies to the existing community.
- iii. To ensure no loss of gas or water pressure, or voltage reduction to the existing community.
- iv. To ensure all works are carried out without any disruption or inconvenience to the existing community.
- v. Cables to be provided underground within the development area.
- vi. That any substations or similar permanent structure are screened and sited away from the existing built area.
- vii. Each Utility Company to fully evaluate the requirements for upgrading and adding to their current systems to ensure adequate and timely provision of Utility Services.

## **Table 2.2 Infrastructure required to support Phase 1 of the WUE – Object**

The responses made for Infrastructure made for table 2.1 apply for this table.

Infrastructure must be delivered early to prevent lack of provision for the expanding population until trigger points are reached.

It is of major concern that the provision for community and social infrastructure in Phase 1 will be reduced because the high cost involved providing the utility infrastructure is being paid by the Phase 1 developer. This infrastructure upgrade is necessary to support all Phases in the development and the costs should be shared between all the developers involved in the Whitfield development.

In-fighting and disagreement between the developers has led to a situation where Phase 1 will have reduced community and social infrastructure provision due to the disproportional costs incurred by Phase 1. This is a disgraceful situation that the SPD must address. It is the local community that will suffer reduction in services for 10 years or more.

## **Appendix 3 Expanded Whitfield Principles – Object**

Two additional Principles are required in this section:

## **Community Development Principle**

The principles listed are rather cold and clinical and omit a Principle for the most important element of the Expanded Whitfield – the Community of Whitfield.

The Community is the most important element of any settlement.

The principle's objective must be to create a new integrated community as Whitfield expands. A community is not made by a collection of dwellings, even new ones. To thrive as a community the common marks of community are needed among the places where people live (a school, surgeries, shops, pubs, parks and churches). Without these it will be just a place where they live. If, as seems to be the case, community facilities are built late in the process or elsewhere, particularly in respect of the school, it is feared the chance for people to identify their new home as part of a community rather than where they happen to live will have been lost.

Provision needs to be made for the appointment of a Community Development Officer, working with the local community and all the organisations within Whitfield, as part of the project. The role should be to ensure community cohesion and integration.

## **Control of Construction Process Principle**

The SPD must contain an additional Development Principle that ensures disruption to the residents of Whitfield is controlled and minimised.

The requirement for the control of the construction process is not contained within the SPD. Undoubtedly a development of this scale will have an impact not only on the physical environment but on the lives of the existing and new community over a 20 to 30 year period. It is important that during this time the impact of the construction process is limited. As such, a number of measures must be contained within the SPD. The SPD must contain requirements for each phase of the development to achieve certification from the Considerate Constructors Code (CCC) scheme (or similar scheme), through adherence to the scheme's Code of Practice.

The additional Development Principle must include measures to:

- Take action to minimise and control any nuisance arising from construction traffic by using measures such as controlling vehicle speeds, wheel washing of HGVs upon departure from the site, controlling times and routes and keeping all site entrances clean.
- Minimise the impact of construction traffic on surrounding neighbourhoods and road network by careful on-site management and reducing the need to import/export materials/spoil.
- Provide a dedicated haul route for construction and delivery traffic visiting the site throughout the construction period with a view to minimising impact on adjacent communities.
- Provide a management framework within which construction traffic is segregated from residents/employees' traffic as the development progresses.
- Put in place management procedures and working methods such as CCC scheme covering matters such as noise, dust and pollution to ensure that the construction works do not adversely affect those living in the surrounding areas. This must be managed through a formal Construction Environmental Management Plan.
- Set up a Local Liaison Group comprising the relevant Site Managers and representatives of local residents and the Local Authorities to ensure that local people are kept fully informed about all aspects of the work and have the opportunity to discuss any operational matters.

- Establish a complaints mechanism to ensure that any concerns raised are properly addressed, in line with the 'Accountable' section of the CCC.

**The Considerate Constructors Code (CCC) scheme's Code of Practice includes:**

- Consideration: All work to be carried out with positive consideration to the needs of all potentially affected parties and the environment in general.
- Environment: Minimising noise from construction, use of local resources where possible, attention to waste management, avoidance of pollution and encouragement of recycling.
- Cleanliness: The working site to be kept clean and in good order at all times.
- Good Neighbours: Full and regular consultation with neighbours including adjacent traders and businesses regarding programming and site activities.
- Respectful: Respectful and safe standards of dress shall be maintained. Lewd or derogatory behaviour will not be tolerated under threat of severe disciplinary action.
- Safe: Construction operatives and site vehicle movements are to be carried out with great care and consideration for the safety and security of the general public and site personnel.
- Responsible: Considerate Constructors will ensure that all site personnel and any other persons working on the site understand and implement the obligations of the Code.
- Accountable: Posters relating to the scheme will be displayed around the site, giving names and telephone numbers of staff who can be contacted in response to issues raised by the general public or other persons affected by the site operation.

**Principle WUE 1 - Future Development**

Justification for future deviation from the SPD and Masterplan must exclude reasons of lack of viability on the part of the developer, especially in relation to infrastructure provision and delivery. If the development is not viable it should not proceed with a reduction in provision or later delivery.

Section 106 Agreements should include periodic review clauses for improvement of community infrastructure payments and / or earlier delivery if housing market prices increase.

**Principle WUE 9 - Green Infrastructure and Principle WUE 11 – Open Space Network**

Design should retain the existing green infrastructure and vegetation, wherever possible.

Existing and new green infrastructure must be protected from future development in perpetuity.

**Principle WUE 12 – Public Realm Management**

During the period of initial developer management, the agreed third party for adoption should be a part of the management team and be consulted on the ongoing management decisions.

Adoption prior to the 5 year period should be permitted subject to mutual agreement being reached between the developer and the third party providing that the third party can show the ability and resources to undertake the management of the areas. This will enable each phase to be adopted as a complete package rather than a patchwork of areas as they 'come of age' and allow the third party to make step changes of staff and resources in an efficient manner.