

REPRESENTATIONS MADE ON BEHALF OF
BARRATT STRATEGIC

ON

DOVER DISTRICT COUNCIL'S
WHITFIELD SUPPLEMENTARY PLANNING DOCUMENT
CONSULTATION DRAFT MASTERPLAN

NOVEMBER 2010

**BARTON
WILLMORE**
Planning · Design · Delivery

**Representations made on behalf of
Barratt Strategic**

on

**Dover District Council's
Whitfield Supplementary Planning Document
Consultation Draft Masterplan**

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Appendix 1:

Site Location Plan

1.0 INTRODUCTION

- 1.1 These representations are made on behalf of Barratt Strategic and Ward Homes who have an interest in land to the south of Singledge Lane which is identified in the consultation draft masterplan SPD as one of five identified extensions to the existing settlement of Whitfield.
- 1.2 Barratt Strategic has been involved with the site for some considerable time, including in advance of and throughout the Core Strategy process including the Core Strategy Examination. Following adoption of the Core Strategy in February 2010, Barratt Strategic has continued their involvement through the stakeholder process through which the SPD has been developed.
- 1.3 Barratt Strategic has made significant comments on the SPD, and its process, including the following correspondence:
- Barton Willmore letter to Scott Wilson dated 28 May 2010 regarding the SPD Sustainability Appraisal Scoping Report;
 - Barton Willmore letter to Dover District Council dated 28 July 2010 on version 2 of the SPD;
 - Barton Willmore letter to Dover District Council dated 27 August 2010 on the draft pre-publication copy V3 of the SPD;
 - Project Centre letter to the Highways Agency dated 15 October 2010;
 - Barton Willmore letter to the Highways Agency dated 23 November 2010.
- 1.4 These representations include those that relate specifically to the site to the south of Singledge Lane in which Barratt Strategic have an interest (sections 2-6 inclusive) and general comments on the SPD (sections 7-10 inclusive). Our principal concerns continue to relate to the restrictive nature of the SPD in relation to the access, phasing and the associated timescale in which land to the south of Singledge Lane is envisaged to come forward. These concerns have previously been raised in the correspondence referred to above.
- 1.5 Paragraph 1.19 of the SPD sets out six issues that Dover District Council are specifically seeking views on. No specific comment is made on issues 1, 2 and 4. Issues 3, 5 and 6 are dealt with in the representations. The table below seeks to summarise the views of Barratt Strategic on these issues and where these matters are dealt with in the representations:

	ISSUE	BS VIEW	SECTIONS
3	Are the development options, and the identification of Option E as the preferred option, reasonable? (Chapter 7)	No	7.
5	Is the proposed phasing agreement (Figure 10.1) reasonable and workable?	No	2, 3, 8, 9 and 11.
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	2, 3, 8 and 9.

2.0 ACCESS TO THE LAND TO THE SOUTH OF SINGLEDGE LANE

2.1 Access to the site is dealt with in terms of the Singledge Lane/A2 junction, the character of Singledge Lane and the Whitfield Roundabout. Barratt Strategic considers that the currently proposed vehicular access strategy for its site is unduly restrictive, unjustified, unnecessary, and inappropriate.

The Singledge Lane/A2 junction

2.2 Paragraph 6.32, with reference to Singledge Lane, states:

“This lane currently provides an access for Whitfield residents to and from the A2 corridor. Discussions with Highway Agency Officers have confirmed that the intensification of this sub-standard access junction would not be acceptable.”

2.3 Paragraph 9.53 includes the following:

“The Highways Agency have raised a policy objection to any additional traffic accessing the A2 via Singledge Lane. Access to this area of land will, therefore, need to be via a new at grade roundabout on the A2. Vehicular access to development fronting Singledge Lane should be from the rear.”

2.4 The last sentence of paragraph 9.56 states:

“Due to the highway constraints on Singledge Lane this area of land can only be developed when the A2 roundabout has been built.”

2.5 Considerable correspondence and discussions with the Highways Agency and Project Centre (the Transport Consultants for Barratt Strategic) regarding accessing the site from the Singledge Lane/A2 junction have taken place over a number of years.

2.6 This has resulted in the submission of significant material to the Highways Agency including a report considering road safety issues dated October 2009 and a preliminary design for upgrading the Singledge Lane junction, supported by preliminary PICADY analysis to determine the junction capacity of the new layout, submitted to the Highways Agency via a letter dated 15 October 2010.

- 2.7 Parsons Brinckerhoff (PB), consultants to the Highways Agency, responded in a Technical Note dated 18 November 2010. This comments on the proposed design of the improved A2/Singledge Lane junction and concludes as follows:

“Ideally the increased use of the Singledge Lane/A2 junction would not be used to access a development of this type. However we recognise that there is a lack of alternative options at this time. We expect that the junction will operate within capacity on the basis of 251 dwellings relying on it for access, should this number increase we would reconsider our position.

This junction will not have sufficient capacity to serve the other development sites proposed at Whitfield.”

- 2.8 The above demonstrates that the land to the south of Singledge Lane can be accessed via an improved Singledge Lane/A2 junction and that restricting access to the land to the south of Singledge Lane to the future (uncertain) delivery of a new roundabout on the A2 is both inflexible and unjustified. Therefore, paragraphs 6.32, 9.53 and 9.56 need to be amended as they no longer reflect the Highways Agency's position. Barton Willmore's letter to the Highways Agency dated 23 November, and copied to Dover District Council, seeks to agree the proposed amended wording to these paragraphs with the Highways Agency.

- 2.9 It is proposed that paragraphs 6.32 and 9.53 are amended to read as follows:

Proposed amendments to paragraph 6.32:

“Singledge Lane currently provides an access for Whitfield residents to and from the A2 corridor. Any intensification of and improvement to the Singledge Lane/A2 junction and Singledge Lane associated solely with the identified extension to the south of Singledge Lane must be demonstrated to be acceptable in highway terms. The masterplan proposes a new access junction on the A2 to the west of the Singledge Lane junction and a traffic management feature on Singledge Lane to the west of the identified extension once the new access on the A2 is available. This arrangement would provide management of the traffic flows able to use Singledge Lane and its junction with the A2 in the longer term.”

Proposed amendments to paragraph 9.53:

“The area of land south of Singledge Lane to the A2, between the Ramada Hotel and Green lane is relatively flat and is capable of development. Singledge Lane is a narrow road with a rural character which should be maintained. Access to this area of land will be acceptable from an improved Singledge Lane/A2 junction and Singledge Lane provided it is demonstrated that this is

acceptable in highway terms and that the character of Singledge Lane is respected. Vehicular access to development (excluding emergency access) will be from a single point along Singledge Lane."

- 2.10 In addition, the last sentence of paragraph 9.56 as currently worded in the emerging SPD states:

"Due to the highway constraints on Singledge Lane this area of land can only be developed when the A2 roundabout has been built."

- 2.11 The above sentence should be deleted with the remainder of paragraph 9.56 remaining as drafted.
- 2.12 Barratt Strategic consider that its site can be accessed via the A2 and Singledge Lane. The SPD seeks to restrict vehicular access to a link from the north via the new A2 roundabout. Given that this is a fundamental issue, the SPD and supporting transport strategy are very deficient as they have not demonstrated that such a vehicular link is feasible. The sketch on p82 of the transport strategy shows this junction but there is no indication of where a link to the site to the south of Singledge Lane would be provided. In fact, as illustrated, it would be very hard to safely create a further side road junction due to the merging of the streams of traffic leaving the roundabout and entering the Temple Whitfield area.
- 2.13 A further consideration is the impact of any access from a new roundabout on the A2 to the character of Green Lane that forms part of the western boundary of land to the south of Singledge Lane. Green Lane is an important landscape feature with potential ecological value. Whilst connection between the land to the south of Singledge Lane and the new Temple Whitfield neighbourhood is important, it may be more appropriate and desirable to provide footpath and cycle links only across Green Lane in order to maintain its character. Whilst a vehicular link would be technically possible and could be mitigated against, access to the land to the south of Singledge Lane from an improved Singledge Lane/A2 junction would provide the opportunity to maintain Green Lane in a form much more closely related to its current character.

The character of Singledge Lane

- 2.14 Paragraph 5.4 states that some smaller roads, including Singledge Lane, are not appropriate to carry additional development traffic.

- 2.15 Paragraph 6.32 refers to a bus gate in Singledge Lane, but there is no suggestion that Singledge Lane will be a bus route. Suggested amended wording to paragraph 6.32 above removes the reference to a bus gate in Singledge Lane.
- 2.16 Paragraph 6.33 states that Singledge Lane will not be appropriate to carry any additional development traffic. In 6.33 there is reference to 'traffic calming' in Singledge Lane and the diagram on p90 in the transport strategy indicates shared spaces treatment and traffic management. It is considered that if the semi-rural character of the lane is to be retained, over-engineered measures should be avoided or kept to a minimum. Changes in the text are required to explain and safeguard this objective.
- 2.17 Paragraph 9.53 states that Singledge Lane is a narrow road with a rural character that should be maintained.
- 2.18 Paragraphs 9.117 and the first bullet point of paragraph 9.122 seek to retain the character of Singledge Lane.
- 2.19 The tenth bullet point of Principle WUE3: Transport and Movement seeks to ensure that the form and function of existing rural lanes, including Singledge Lane, are protected and additional vehicular traffic along these routes will be discouraged.
- 2.20 It is agreed that the semi-rural character of Singledge Lane should be protected and if necessary this street could be treated as a shared space or otherwise managed to achieve this objective. The street has modest levels of traffic and the relatively small scale of the land to the south of Singledge Lane site would produce limited extra traffic movements. There is no fundamental reason why the land to the south of Singledge Lane should not be served off this street as a small extension of the existing settlement.
- 2.21 Discussions have been held with Kent Highway Services (KHS) about the use of Singledge Lane and its treatment so as to retain its character. It is evident that KHS has no principled objection to the use of Singledge Lane to serve the land to the south of Singledge Lane and there is general agreement on how improved facilities for pedestrians (i.e. existing and new residents) can be provided.
- 2.22 Given the Highways Agency's position on releasing the land to the south of Singledge Lane from an improved Singledge Lane/A2 junction set out in the Technical Note dated 18 November 2010 and the discussions with KHS, the wording of the SPD needs to be more flexible so that provided it can be demonstrated that the rural character of Singledge Lane

can be retained, and all other planning matters are addressed including any issues of pedestrian safety, a minor increase in traffic on Singledge Lane associated with the development of land to the south of Singledge Lane would be acceptable. Therefore, specific references to Singledge Lane not being appropriate to carry any additional traffic should be removed from paragraphs 5.4 and 6.33 for example.

The Whitfield Roundabout

- 2.23 It is accepted that the Whitfield Roundabout is an important and sensitive junction, and in the context of the whole development area needs to be improved and managed. It is accepted that signalisation is the most appropriate and beneficial way to upgrade and manage conditions at this junction. However, there will be a limit of the number of phases into which improvement can be divided, particularly if excessive disruption is to be avoided.
- 2.24 The transport strategy implies in 7.11.6 that these improvements need to be undertaken beyond the first 2,000 dwellings. The technical basis for this is not known, but the statement is accepted at face value at present. However, paragraph 6.23 in the draft SPD is questionable in two respects. Firstly, there is no real justification provided to support the expressed concern about the timing of spending capital responses. Secondly, the reference to 'ad hoc' sites appears to imply that some site's traffic have more 'right' to take up available capacity than others. This is not justifiable, or equitable, or logical. Therefore, the last sentence of paragraph 6.23 should be deleted.
- 2.25 Para 6.25 is unclear in that it is not absolutely clear what 'this trigger' refers to. Its contents are also not consistent with the transport strategy. The latter states the VISSIM modelling is required beyond 2,000 dwellings, whereas the draft SPD clearly states that modelling is necessary at earlier stages in the development process.

3.0 THE PHASING AND TIMING OF THE LAND TO THE SOUTH OF SINGLEDEGE LANE

- 3.1 Section 2 demonstrates that there is no reason why land to the south of Singledge Lane could not be served from an improved Singledge Lane/A2 junction provided that the character of Singledge Lane is respected. Therefore, there is no need to restrict development on land to the south of Singledge Lane to the delivery of a future junction on the A2 impacts on the timing on its own even without the proposed phasing set out in the SPD.
- 3.2 As a general point, the facilities plan (figure 5.2), demonstrates the proximity of land to the south of Singledge Lane to a number of existing facilities in Whitfield. This, alongside the recognition that the site is a natural extension to Whitfield, are good reasons why development on land to the south of Singledge Lane should not be unnecessarily delayed. Delaying development on land to the south of Singledge Lane does not make any sense in principle given the District Council's ambitions for growth and the role that the site could play in helping to achieve the anticipated rate of delivery at Whitfield. In terms of delivery it is also highly relevant to note that Barratts are a national house builder who are committed to developing the site to the south of Singledge Lane themselves as soon as they gain consent.
- 3.3 Paragraph 9.32 states that the village extensions are likely to rely on highway and utility infrastructure that will be delivered by the adjacent neighbourhood phase of development which means that they are likely to be delivered in sequence/alongside the adjoining neighbourhood.
- 3.4 Paragraph 10.26 ties delivery of each of the identified extensions to Outline planning permission being obtained for each respective neighbourhood. The final sentence of paragraph 10.26 states:

“In practice this means that they (identified extensions) will come forward as part of the larger overall phases and not as distinct parcels of development in their own right.”

- 3.5 Principle WUE 14 specifically refers to new neighbourhoods and states that the new neighbourhoods will be developed from the east in an anticlockwise direction and that each neighbourhood should be substantially complete before the next neighbourhood is commenced.

- 3.6 This Principle specifically relates to the six new neighbourhoods, i.e. it does not apply to the identified urban extensions such as land to the south of Singledge Lane.
- 3.7 Paragraphs 9.30-9.33 introduces 5 areas where analysis of Whitfield has found that development could be extended without detriment to its character. As a principle it would follow in a growth area that, provided all planning matters can be addressed, these limited areas should be brought forward as natural extensions outside of any overall phasing of the much larger six new neighbourhoods.
- 3.8 The SPD ties, via paragraph 10.26 of the SPD, development of land to the south of Singledge Lane, an identified extension, to the delivery of Temple Whitfield the last of the new neighbourhoods envisaged to come forward and reliant on a new junction off the A2. This is unnecessary in Highways terms and unduly inflexible.
- 3.9 As a principle, the identified extensions should come forward outside of any general phasing of new neighbourhoods in recognition of their limited size, relationship with the existing village and to assist with delivery rates. This is considered to particularly be the case for land to the south of Singledge Lane given its well contained nature which means that it has less of a relationship to its nearest new neighbourhood (Temple Whitfield) than the other identified extensions and the ability to access the site from the existing highway network with necessary improvements.
- 3.10 Therefore, paragraph 10.26 particularly needs to be amended to make it clear that the land to the south of Singledge Lane can come forward, provided all planning matters are addressed, outside of the general phasing sequence and before the approval of development of the Temple Whitfield neighbourhood.
- 3.11 Paragraphs 9.53 to 9.56 need to be substantially re written to reflect the above comments on access to land to the south of Singledge Lane, the Phasing and Timing of land to the south of Singledge Lane and the representations set out in section 4 below.

4.0 SPECIFIC GUIDANCE ON DEVELOPMENT OF LAND TO THE SOUTH OF SINGLEEDGE LANE

4.1 Paragraph 9.55 envisages the site to the south of Singledge Lane being capable of providing 150 dwellings, of no more than two storeys in height. It is considered that the SPD is too prescriptive with reference to the detail of future delivery of this site. It is acknowledged that some character analysis work has been undertaken and that the site has a close relationship to existing development and that this has led to it being acknowledged as a natural extension to Whitfield. However, the Historic Development & Character Analysis, produced by Adam Urbanism, that is part of the SPD evidence base does not clearly support paragraph 9.55 of the SPD. Paragraph 3.3 of the Historic Development & Character Analysis explains the low density, low rise nature of the properties on Singledge Lane. However, it is relevant to note that mention is made of the large Ramada Hotel lies directly adjacent to the site to the south of Singledge Lane. No link is made between the existing character and how the site to the south of Singledge Lane should be developed. Paragraph 7.3 of the conclusion sets out the overall approach to character and density for the strategic development and states:

“Clearly the new development will be of a very different character to the existing village. It is for this reason that the area of study and analysis looks at a wider area than Whitfield itself and considers surrounding villages and towns in East Kent which demonstrate a pattern of development and character more consistent with the anticipated densities of the WUE.”

4.2 No distinction is made in the Historic Development & Character Analysis to the treatment of identified extensions in the SPD compared to new neighbourhoods. It is considered that the advice on development of the site is inflexible and pre-judges detailed design work that would be undertaken in developing detailed proposals for the site.

4.3 This is considered unduly restrictive for the following reasons:

- The site is the only extension site surrounded on three sides by built form and with built form bordering approximately half of the fourth side. There is a significant hedge to the Singledge Lane frontage of the site that will be retained. Therefore, the site is well contained;
- Notwithstanding the significant hedge to Singledge Lane, the need to sensitively deal with the Singledge Lane boundary is acknowledged. However, that does not mean that low density development needs to be applied across the entire site;

- Paragraph 9.30 talks about the extensions to the existing settlement being transition features between the existing village and the larger development areas that will help bridge the gap between the existing and expanded development areas. Figure 9.2: Road Hierarchy Plan shows the locations of the five Whitfield extensions. This clearly shows the transitional position between existing Whitfield and new neighbourhoods of the 4 identified extensions to the north and east of Whitfield. However, the site to the south of Singledge Lane is different in this regard. Only part of the boundary with Green Lane faces a new neighbourhood (Temple Whitfield) yet, Figure 9.2, shows this area to indicatively include the new A2 roundabout and a wedge of open space;
- It contradicts paragraph 9.125 that considers density at the immediately adjoining Temple Whitfield new neighbourhood, where a relatively high density of 35.5 dwellings per hectare is considered achievable away from the listed Temple Farm. This considerably higher density takes into account the need to protect the existing and proposed green corridor function of Singledge Lane. Temple Whitfield also has open space to its other main frontage facing the A2 and borders Green Lane and the properties that face Green Lane and back onto the Barratts site.

4.4 Clearly the relationship between the existing dwellings to the north of Singledge Lane is important, but the final design, including dwelling storey, actual height and density, for land to the south of Singledge Lane should be informed by detailed character and landscape assessments.

4.5 Paragraph 9.55 should be reworded as follows to reflect the above and to be flexible:

“The amount of development on this site and its design, including building heights, needs to be informed by detailed opportunity and constraint work that will consider topography, landscape, ecology, potential widening of the A2 and noise associated with the A2. Development also needs to be informed by adjacent development.”

5.0 THE BOUNDARY OF THE LAND TO THE SOUTH OF SINGLEDGE LANE

- 5.1 The boundary of the extension to the south of Singledge Lane shown in Figure 9.9 needs to be amended to include the curtilage of 'Bonne chance'. Figure 9.9 in the final SPD should accord with the attached Site Location Plan (appendix 1).
- 5.2 In general some of the figures in the SPD include 'Bonne Chance' as part of the SPD area, for example figures 6.1, 6.2, 6.3, 6.4 and 6.5, whilst some of the figures exclude 'Bonne Chance', for example the Options in Section 7 and figures 9.1 and 9.2 in addition to figure 9.9.
- 5.3 The SPD should be consistent in its definition of the extent of the site to the south of Singledge Lane and therefore 9.9 and all figures should show the site boundaries to include 'Bonne Chance' in accordance with the attached Site Location Plan (appendix 1).

6.0 THE NEW JUNCTION ON THE A2

- 6.1 In the transport section of Appendix 2: Infrastructure Requirements, the A2 at grade roundabout is given a broad timing of 2011-16. The position of Barratt Strategic is that satisfactory access can be achieved from Singledge Lane and the Singledge Lane/A2 junction, i.e. access is not dependent on a new A2 junction. Notwithstanding, the above the broad timing given to the new A2 junction does not accord with the anti clockwise approach. It demonstrates that development of new neighbourhoods in the west could come forward much sooner than the SPD envisages increasing the probability of an accelerated delivery of the WUE.
- 6.2 Figures 6.5, 9.1 and 9.2 indicate a new roundabout on the A2 approximately at the point where Green Lane meets the A2 immediately to the west of the site to the south of Singledge Lane. However, figure 9.3 shows the same location as being an indicative SUDs Attenuation Basin.

7.0 THE TESTING OF ALTERNATIVES

7.1 Concerns remain about the testing of options through the SPD process and whether reasonable options have been considered as alternatives and whether options have been robustly tested in a fair and transparent way and at the appropriate time in the process.

7.2 A Sustainability Appraisal (SA) has been undertaken for the SPD by Scott Wilson. Whilst the 2008 Planning Act removed the requirements for an SA report to be prepared for all SPDs, Appendix 1 of the SA (The Legal Standing of this SA) makes it clear that the Whitfield Urban Extension (WUE) masterplan SPD has been screened in as requiring an assessment under the Strategic Environmental Assessment (SEA) Directive. It should be clear in terms of which options were tested and why certain options are selected in the SPD. The SA does not appear to clearly set out how options have been tested against clearly set out objectives and indicators. It is difficult to see how the SA could be used to test alternative approaches. This is important as a point of process, but also given that paragraph 3.5 of the SPD states:

“The SA report can also be used as a reference point by any consultees who might wish to discuss the merits of alternative approaches as part of their response to the draft SPD.”.

7.3 Paragraphs 1.1 of the Non-Technical Summary and 2.1 of the main document states that the SA process is a mechanism for considering reasonable alternatives.

7.4 Section 7 of the SPD considers Development Options, but does so in the context of the two key choices considered in the Interim SA, i.e. how Whitfield should be extended and the number of neighbourhoods that would be suitable, ranging from two to six. The issues assessed at the interim stage give an indication of the minor role of the SA in the process of preparing the SPD. Access options, which are key to phasing and therefore delivery, should have specifically been assessed at this stage. The option work in the SPD goes onto focus on six options for built form.

7.5 None of these options consider fundamental issues, such as reasonable alternatives for accessing the site or phasing the site in terms of direction, multiple starts and rate of delivery.

7.6 The SA looks at what are considered to be reasonable alternatives in the context of a number of issues/topics. These are done in text form rather than any scoring of options/alternative against a set list of criteria. Phasing/Delivery options are not specifically considered, which is considered an omission given the growth strategy set out in the adopted Core Strategy and the restrictions in the SPD to the rate and sequence of growth.

- 7.7 The transport strategy (September 2010) prepared by PBA underpins the draft SPD, but its preparation has not been transparent or inclusive. Consultants advising Barratts have not been given the opportunity to understand or influence the preparation of the strategy. PBA, have been asked to clarify matters however the responses have been, slow, incomplete, or unsatisfactory. For example, several questions have been asked about the forecast distribution of development traffic but to date a full and clear answer has not been provided. PBA were asked to provide an illustration of how access would be provided to the land to the south of Singledge Lane, via the A2 roundabout but it declined to provide this. This is in marked contrast to the work set out in the strategy showing how the eastern area of the WUE would be accessed.
- 7.8 Reference is made into the use of the VISSIM model to formulate the strategy and SPD, but Barratt Strategic and others have not been given access to this tool, or an insight into its use, in order to formulate alternative ideas, or test the proposed strategy.
- 7.9 Work on the strategy appears to be lopsided, in favour of the eastern part of the WUE. For example, excluding the pre-development and end-state conditions, four development phases are considered, (circa 300; 1200; 2500; 3500 units). This shows that fairly detailed thought has been given to the phasing of the first 20% of development, but the suggested last 40% of development is lumped into one large unrefined phase. This illustrates an unbalanced approach.

8.0 PHASING AND DELIVERY GENERALLY

- 8.1 The starting point is that Dover District Council have adopted an ambitious growth agenda and Whitfield is the key strategic site identified to realise that growth. Therefore, timely delivery of the WUE should be encouraged in the SPD provided it can be supported by the necessary infrastructure.
- 8.2 Paragraph 1.14 states that when development starts and how quickly it proceeds will be determined by economic factors and the commercial judgement of developers. However, the SPD will also impact on delivery and is considered to be fundamentally overly restrictive in terms of flexibility and rate of delivery in its current form.
- 8.3 Policy CP11 (ii and iii) state that the proposals should relate to the whole allocated development or if less do not prejudice the implementation of the whole development and that the proposals include a phasing and delivery strategy that is related to the provision of all forms of infrastructure and the creation of neighbourhood centres.
- 8.4 Paragraph 8.4 of the SPD is supported as it states that planning applications for different phases of development need to be supported either by existing infrastructure or that necessary additional infrastructure will be provided at the right time. This reflects policy CP11 and does not seek to artificially restrain the delivery of development.
- 8.5 The following parts of the SPD, that seek phasing from east to west with each neighbourhood substantially complete (when 85% of the units are occupied) before moving onto the next, are objected to for unnecessarily constraining the rate of development at Whitfield:
- The fourth Whitfield Development Objective set out in paragraph 9.1;
 - Paragraph 10.2;
 - Paragraph 10.27;
 - Principle WUE 14.
- 8.6 Paragraph 10.11 states that each neighbourhood must be substantially occupied prior to the commencement of the next neighbourhood, unless the annual delivery rate has fallen below 240 dwellings per year.
- 8.7 The phasing generally and the proposed mechanism to assist delivery if it falls below 24 dwellings per annum raises the following concerns:

- Restricting development to one phase at a time has serious implications on delivery rates, particularly within the current market and cannot be the correct approach in principle given the District's growth ambitions and the principal role of Whitfield in meeting those ambitions;
- What is the harm of seeking unrestricted growth if development is supported by the infrastructure required? Paragraph 10.22 states that 'development from both ends would dilute the ability for key services and facilities to come forward and would impact heavily on the existing road network which is particularly constrained to the west' – this is considered to be unsubstantiated and contrary to the principles set out in Policy CP11 (ii and iii) of the Core Strategy and paragraph 8.4 of the SPD;
- The approach will unnecessarily prolong the overall build out time at Whitfield (increasing the overall length of disturbance to Whitfield residents);
- Restricting the rate of growth will delay the rate at which socio economic issues can be addressed in the District and risk the District losing out on those wishing to capitalise on the benefits of HS1 to other areas;
- What happens if a particular neighbourhood cannot come forward in the suggested sequence?;
- What happens if 240 dwellings are being constructed annually at Whitfield, but completions elsewhere in the District are lagging behind the Core Strategy requirements?, i.e. restricting growth at Whitfield could increase the likelihood that applications are pursued elsewhere on the District un allocated sites;
- In the event delivery rates falls below 240 dwellings per year, will such a restrictive approach ensure that implementable consents are in place elsewhere in the WUE to assist delivery?;
- What happens at the start of the anticipated housing trajectory in table 10.1, when 240 dwellings are not projected to be built until 2017/18.

8.8 The way in which phasing is restricted in considered contrary to the objectives of the Core Strategy.

8.9 It is not disputed that Light Hill makes sense as the first phase of development, however, restricting development on a phase by phase basis rather than encouraging multiple starts across phases, as well as within phases, is fundamentally objected to.

8.10 With reference to the 6 issues/questions listed under paragraph 1.19, it is not considered that the proposed phasing arrangement (Figure 10.1) is reasonable and workable (question 5) and it is not considered that the masterplan has 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 (question 6).

9.0 IMPLEMENTATION

- 9.1 The Adopted Core Strategy in Policy CP11 (ii and iii) state that planning permission will be granted provided that the proposals relate to the whole allocated development or if less do not in any way prejudice the implementation of the whole development (CP11 ii) and that *the proposals include a phasing and delivery strategy that is related to the provision of all forms of infrastructure and the creation of neighbourhood centres (CP11 iii).*
- 9.2 Due to the multiple land ownerships and interests across the area that the SPD covers it is considered that further work is required to improve the evidence base and strengthen policy to avoid the risk of prejudicing the implementation of the whole of the Urban Extension Area.
- 9.3 An important concern is the draft SPD does not go any way near far enough to satisfying the Core Strategy requirement to demonstrate implementation of the whole can take place. The key missing ingredient is for a costed infrastructure plan accompanied by a funding strategy demonstrating a basis for landowner contributions and other funding sources. There also needs to be a framework landowners agreement which provides that all of the necessary land can be made available for strategic infrastructure. Without both of these components this there is a real risk of a piecemeal approach to the delivery of infrastructure and the risk of future phases being unviable if they are required to fund a disproportionate cost of infrastructure. The risk of ransoming approaches being taken also arises due to the number of landowners involved.
- 9.4 Our view is that the Delivery and Implementation Plan as part of the SPD should be expanded to include:
1. plans for all infrastructure components – which serve the UEA as a whole;
 2. allocating infrastructure to phases and trigger points;
 3. cost estimates; and;
 4. a framework for financing these costs.

10.0 HABITAT REGULATIONS ASSESSMENT ISSUES

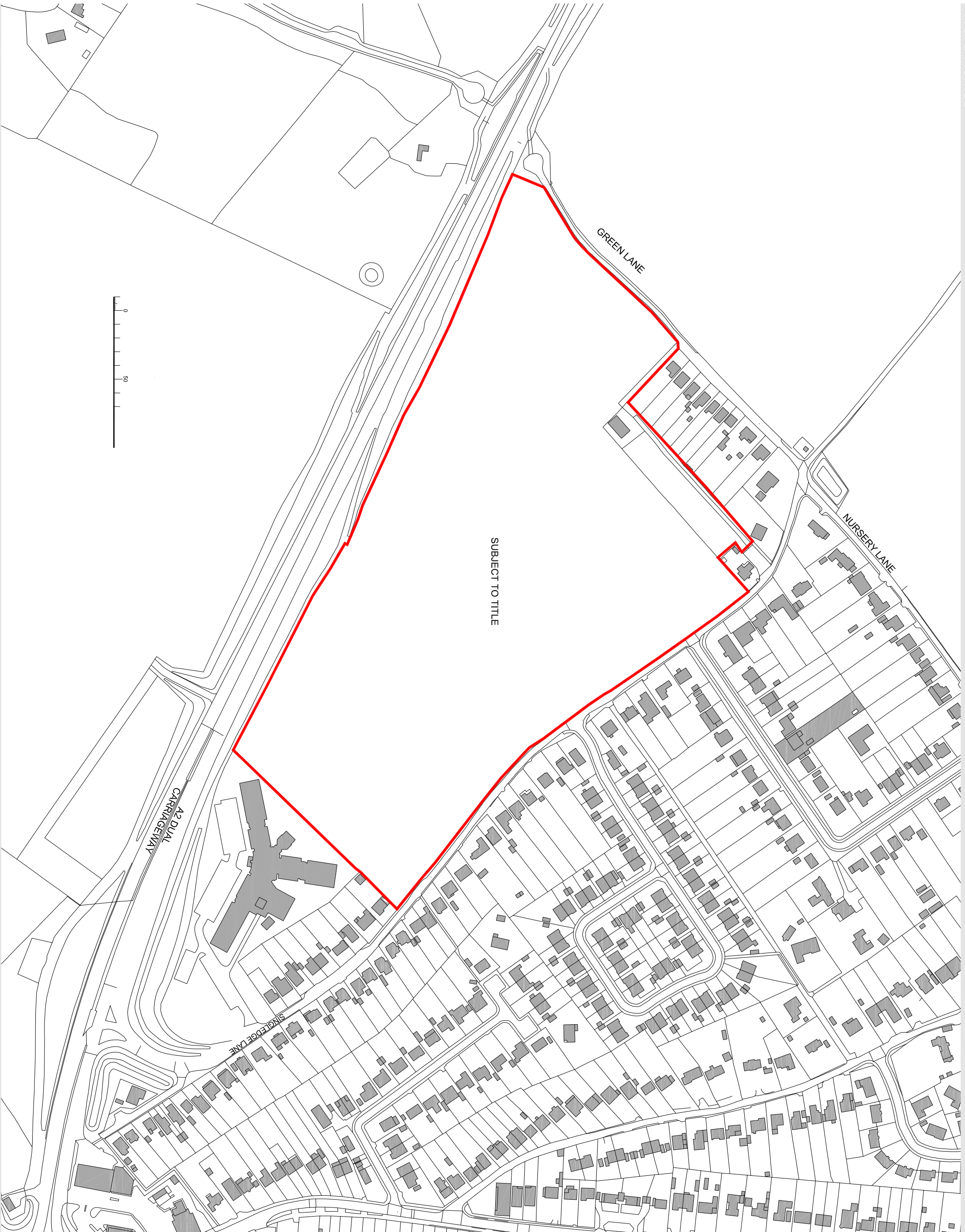
- 10.1 It is noted in paragraph 4.3 of the SPD that the preferred approach in dealing with effects on the European sites is similar to that for the Dorset Heathlands, whereby an interim planning framework allows for a sequential provision of mitigation.
- 10.2 It is understood that Dover District Council have devised a formula for dealing with recreational impact mitigation as far as the Lydden and Temple Ewell Downs SAC is concerned. This formula is understood to be based on a number of factors that include the proximity of a particular site to the SAC and the cumulative amount of development that has taken place at Whitfield.
- 10.3 It would appear that the mitigation strategy, which it is acknowledged is relatively complicated, is still being developed. This makes it difficult to submit meaningful representations on this issue at this time. Therefore, Barratt Strategic reserve the right to make specific comments on this issue once the full mitigation strategy becomes publicly available and the implications of it on specific sites are known.
- 10.4 In principle, however, this issue needs to be dealt with in a flexible way and should not be used to restrain the pace of development or the phasing of development unnecessarily.

11.0 PARAGRAPH 6.1

- 11.1 At the end of paragraph 6.1 two scenarios are set out which the SPD considers may need a slightly different approach towards urban design and layout. The second scenario suggests that there may be good planning reasons why phase 1 can be treated differently to the subsequent phases of the development.
- 11.2 This is a concerning statement and appears to suggest a preferential treatment of phase 1. As the SPD currently reads, phase 1 (Light Hill) has a 'monopoly' position in terms of phasing/timing allowing it to be substantially built out (and units sold and occupied) before the next phase starts.
- 11.3 Paragraph 9.68 states that Light Hill is the least sensitive and constrained of the areas capable of being developed at a higher density than some of the other villages/neighbourhoods. This is not disputed, but provides opportunities to those developing phase 1 that are not necessarily available to other parts of the WUE.
- 11.4 Given the advantages set out above, and in order to get the development off to a positive start so as to begin positively addressing the socio economic issues set out in the Core Strategy, the SPD should ensure that phase 1 is an exemplar for Whitfield setting the benchmark in terms of quality, sustainability, the provision of affordable housing and providing connections to future phases. In accordance with Policy CP11 (ii) of the Core Strategy, phase 1 must not in any way prejudice the implementation of the whole development.
- 11.5 In addition there is an inconsistency between scenario 2 of paragraph 6.1 and the first bullet point of 6.11. Scenario 2 of paragraph 6.1 argues that phase 1 is largely enclosed by the A256, whilst the first bullet point of paragraph 6.11 states that beginning construction of the WUE from the south east corner of the site would emphasise the development as a Dover facing settlement from the outset.

Appendix 1

Site Location Plan



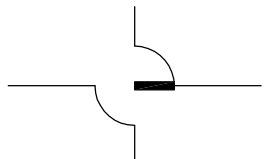
Notes:

Please report all discrepancies, errors and omissions. Verify all dimensions on site before commencing any work on site or preparing shop drawings. All materials, components and workmanship are to comply with the relevant British Standards, Codes of Practice, and appropriate manufacturers' recommendations that from time to time shall apply. For all specialist work, see relevant drawings.

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Revisions:

rev	date	revision



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Project No: 2060/005
 Ward Homes
 Proposed New Residential Development
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Site Location Plan