

Appendix 3

TLP Detailed comments on:
Whitfield Urban Expansion Supplementary Planning Document
Consultation Draft Masterplan

Review of : Whitfield Urban Expansion Supplementary Planning Document - Consultation Draft Masterplan		
Section/ para	Topic	Comment
	Introduction	
1.14	Phasing	The start and subsequent progress of the development with the current proposed phasing would be wholly dependent on one developer initiating the works and then progressing to substantial completion (85%) of Phase 1 before subsequent phase can commence.
	Context	
2.2.	Principle CP11	<p>The policy in the Core Strategy allows for the managed expansion of Whitfield for at least 5,750 homes. There is a presumption that planning permissions will be granted as long as a number of criteria are met in the applications. It is vital that the SPD is compliant with a situation where each of the nine criteria can be reasonably met. Criteria that are not adequately satisfied in the SPD include:</p> <p><i>iii) The proposals include a phasing and delivery strategy that is related to the provision of <u>all forms of infrastructure</u> and the creation of neighbourhood centres.</i></p> <p>The current phasing strategy shows limited provision for :</p> <ul style="list-style-type: none"> • Areas of significant and integrated open space within Phase 1 <p><i>vi) Existing hedgerows and tree lines are , wherever possible retained and enhanced to form the basis of a green infrastructure network that connects with the wider network and also incorporates open spaces for recreational and other purpose, including the provision of facilities to deflect the likely urbanization and recreational pressures arising from the development away from the Lydden and Temple Ewell Downs Special Area of Conversation.</i></p> <p>The current masterplan appears to retain the existing landscape features including hedgerows and tree lines as part of the design approach, however the phasing strategy shows limited provision within Phase 1 for :</p> <ul style="list-style-type: none"> • A range of recreation facilities e.g. sports pitches • A significant alternative for the existing and new population that would reduce the pressures on the SAC <p>The main areas of open space indicated on the phasing plan are to the perimeter of Phase 1 and appear primarily to be a buffer either to existing main roads or the existing perimeter of Whitfield</p>
	Preparation of the SPD	
3.8	Public participation-Landscape	The stakeholder workshops identified the need for a number of factors which have been incorporated into the masterplan. However the current Phase 1 proposals have the majority of the

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	and Ecology	open space areas to the perimeter of the development and which to the east and south are adjacent to the A256 and A2 and hence are less desirable as 'useful green space for the community' . Other areas of open space adjacent to existing Whitfield around Phase 1 have been set aside to protect the existing village edge and minimize overlooking of existing properties. While understandable from the existing local residents perspective this objective does not generally result in usable areas of open space, but more narrow buffers.
	Habitat Regulations Assessment	
4.4/ Table 4.1	Recreational pressure on SACs	<p>There are two SACs that are close to Whitfield.</p> <p>Lydden and Temple Ewell Downs SAC – The SPD notes that no amendments are required to the scale, design, phasing and layout of the accessible greenspace within the proposals. However there are also recommendations that the greenspace for Phase 1 should be provided as one of the first elements of delivery. The ability for the narrow perimeter strips of Green Infrastructure, adjacent to the main roads, such that they form attractive alternatives to the SAC is questionable. A larger area of greenspace such as area '06' – in Phase 2 at an initial stage would be a preferable strategy to ensure that the GI is effective from day 1. If the GI monitoring indicates that additional areas of alternative greenspace are required at some point mid way through Phase 1 then there is no scope to provide this with under the current Phasing Plan. Furthermore as residents at Phase 1 are given 'information packs', concerning the alternative areas of open space – they should be more attractive than the SAC. The narrow belts are of more limited appeal than a larger area such as areas '06'.</p> <p>Dover to Kingston Cliffs SAC – the SPD notes there would be an increase in pressure from the residents particularly those at Phase 1 - Light Hill on the SAC. The SPD notes that for residents of Light Hill that area '06' (one of the largest areas of new greenspace at 9ha) will be situated ' <i>immediately adjacent to Light Hill</i> ', and that it will reduce the pressure on the SAC. However this section of the SPD portrays an inaccurate impression as area '06' is part of Phase 2 and will not even begin to be delivered until Phase 1 is substantially complete. We recommend that area '06' should be included within a revised Phase 1 proposal to ensure that the impact on SACs are minimized by suitable advanced provision of alternative sites.</p>
	Whitfield Today	
5.32		<p>There is general agreement with the analysis of Whitfield in 5.1-5.32</p> <p>Urban Design Conclusions</p> <ul style="list-style-type: none"> The origin of Whitfield around the now separated hamlet of Church Whitfield would support the re-integration of the new

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		settlement /neighbourhood with the hamlet. This would provide a renewed historic focus and context for the new development and Parsonage Whitfield in particular.
5.33		<p>Landscape and Visual analysis –</p> <p>The LVIA provided in the evidence base (October 2010) provides a sound analysis and basis for describing the existing context of the site and locality. This document should be specifically referenced in the SPD.</p> <p>A number of landscape priorities from the LVIA are fed into the masterplan including contributions to GI, rights of way and rural lanes, setting of historic assets, viewpoints and reference to landscape policy.</p> <p>The masterplan works with the existing local characteristics of the landscape including the south west – north east ridges, belts of trees, hedges and woodlands.</p> <p>There would be significant landscape and visual impacts arising from the development including the loss of openness and amenity which is acknowledged in the LVIA.</p> <p>The LVIA states that this loss will be largely offset by the proposed enhancements (e.g. paras 6.14, 6.23 and 6.28) to ensure that the residual adverse effects are not significant. However the timescale at which this situation is not provided.</p> <p>In our view the impacts will not be mitigated in the short, medium or even long term such that the local character is preserved, as generally required by Policy DM15 in the Core Strategy. New and enhanced facilities will be provided but the question as to whether they offset the losses is less questioned. However as an allocated site in the Core Storey the adverse impact on landscape character is compliant with Policy DM16 since the site is allocated in the DPD's. A new landscape/townscape will emerge that has been informed by and developed from by the baseline landscape character. Therefore in the context of an allocated development area in the Core Strategy this is considered to be acceptable.</p>
5.34-45		The analysis of the WUE area is generally sound and describes a number of constraints. A greater level of detail could include for some more local variations e.g. the relatively more enclosed pattern of fields to the west of Area C . It is noted that the four analysis areas A-D do not reflect the six neighbourhood areas in the masterplan or the phasing plan.
5.46		<p>Landscape Priorities</p> <p>The three landscape priorities of reinforcing local character, retention of important views into and out of the settlement and WUE and creation of a strong linked network of GI are supported.</p>
5.48		<p>Comments on the landscape objectives include:</p> <ul style="list-style-type: none"> • Reinforcing topographical and vegetation patterns – agreed • Incorporating the A256 into the grain of the landscape – supported in principle however as the route cuts perpendicular to the grain of the landscape this cannot be easily or

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		<p>realistically be achieved. Our preferred approach option is to retain views of landscape but to screen road/traffic by provision and management of intermediate height screening of scrub and smaller trees.</p> <ul style="list-style-type: none"> • Preserve openness to north east of site wherever possible – relatively impractical objective. If areas to the perimeter are left open the development will be more visually prominent. We consider it preferable to provide additional woodland planting to higher ground to contain development and follow the existing pattern to north west of site • Retain narrow lanes – agreed – use as non vehicular / recreational routes • Protect the setting of listed buildings - agreed
5 – Page 21	Landscape Conclusions	<ul style="list-style-type: none"> • Retain important views into and out of the settlement – this is supported, however the ability to provide ‘broad views’ from within the existing development and WUE is questioned. There are more likely to be ‘framed views’ through corridors and areas of open space • Create corridors and major open spaces for access and view – agreed • Use of structural planting to incorporate the settlement – agreed. This could be an improvement over the existing situation to parts of the village where the existing built form presents a raw edge e.g. to the east • Create a strong network of GI including existing hedges and trees – agreed • Developing a network of pedestrian and cycle routes within and around the settlement – agreed but ensure links to wider countryside while still protecting the SAC • Provide diversity of uses for open space e.g. food cultivation, outdoor classrooms and healthy recreation - agreed • Enable community involvement – agreed
5.54	St Peters Church	<p>The church lies at the heart of the hamlet of Church Whitfield. It currently has a secluded location set among trees which contains the setting of the listed building. There are no other listed buildings in the settlement however the presence of mature trees and the narrow lane helps to create an attractive landscape setting in a local valley.</p>
Page 22	Listed Building Conclusions	<p>St Peters Church</p> <ul style="list-style-type: none"> • Maintain visual connection with Whitfield along line of Right of Way – supported in principle – but unclear to what extent this is achieved in the masterplan. It is referable to create an enhanced setting around an enlarged ‘village green’ with informal grouping of new houses forming a new edge to the south and west. • There are opportunities for recreation, conservation and historic interpretation in the Church Whitfield area. • Lower density development facing Church Whitfield – generally agreed. Suggest the priority is to create a suitable village character to embrace the hamlet setting. Demolition of some less distinguished modern buildings would provide

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		<p>opportunities to enhance setting of church and hamlet.</p> <ul style="list-style-type: none"> • Maintain rights of way to village – agreed together with associated vegetated corridors • Maintain character of Church Whitfield Road – agree – suggest the route is made a no through road
Page 23	Key Messages	<ul style="list-style-type: none"> • The first bullet identifies there would be a tension between the objective of reflecting the existing village character and densities (11-32 p ha) with the proposed WUE if a 'minimum total of 5,750 houses are provided. This indicates there could be pressure on aspects of the landscape and visual objectives and identify development in unsuitable areas or at a higher density that is desirable to achieve the stated landscape, visual and GI outcomes. It is recommended that density plans are produced for the various individual parcels comprising the whole WUE to clearly demonstrate how the housing numbers would be provided without undue pressure on the GI and landscape and visual aspects of the scheme. • The third bullet infers that from the LVIA that the valley slopes and plateau areas are less visually sensitive and are a lower constraint on development. While this may be the case in theory and to an extent in practice, development on the slopes will still have a major visual impact until planting matures. Cross sections (long and short based on a typical layout) should demonstrate how effective the areas of open spaces to the valley bottoms and ridges would actually be in providing mitigation of the development. This should include areas of new structure planting which should allow for the shadows cast by trees to the northerly aspect. This may indicate that there should be a more comprehensive programme of advanced planting in different phases to provide early mitigation of the WUE as a whole. • The fourth bullet indicates that the openness of the setting of Church Whitfield should be retained. A suitable offset and the rationale for this should be tested through options that provide a range of urban design treatments.
6	Development Area	
6.1.2		<p>The indication that Phase 1 could be treated differently in terms of layout, type, style and urban design to the rest of the WUE seems entirely inappropriate. Changes to the Building Regulations may well come into effect before part or all of Phase 1 is approved, started or completed. Rather a similar philosophy should apply to the whole development to set high standard of design and sustainability. It is recommended that this paragraph should be deleted or more clearly substantiated. The statement also seems to be contrary to the first two bullets in bold text box at section 9.1- page 41</p>
6.5 – Table 6.1	Green Infrastructure	<p>The Table correctly identifies a range of GI Features. There is currently insufficient information to indicate where the following</p>

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		<p>features would be provided:</p> <ul style="list-style-type: none"> • Locations for semi-natural open space. The adherence to Natural England's 'ANGSt' is supported and should be referenced here to Appendix 3 Principle WUE 11) • Locations for habitat improvements including - wildflower grassland and woodland • Sports pitches – numbers and locations • The above elements should be demonstrated through the provision of a landscape masterplan to support the overall masterplan <p>Flood Risk and Surface Water</p> <ul style="list-style-type: none"> • The scope for SUDS to contribute to the drainage of the WUE is welcomed however the areas shown on the Concept masterplan should tested or verified to identify if the land take is adequate.
7	Development Options	
Table 7.1		Six options have been outlined. A summary table 7.1 using a traffic light system scoring has been applied to a range of criteria from the Sustainability Appraisal and the SPD. The application of the red, amber, green categories are not fully transparent and the rationale for scoring on each factor should be more fully substantiated. Some of the criteria seem to be repeated and other factors could also be considered. Some of the Options notably Option A implies it does not meet hardly any factors however this is due to lack of internal detail
9	Concept Masterplan	
Page 41		<p>Bullet 6 – rationale for providing 'transition' areas between existing Whitfield and new development is not necessarily accepted. Some parts of masterplan have 'Whitfield Extensions' which are more closely related to the existing urban fabric. However some of these areas e.g. area west of Phase 1 have access not from the existing parts of Whitfield but through the new neighbourhoods. The areas of open space that buffer the new neighbourhoods from the existing settlement and Whitfield extension need to be meaningful, usable and work in design terms.</p> <p>Bullet 9 - Opportunities for cycle and pedestrian networks to work as GI and alternative for use of car is agreed in principle . However the proposed phasing plan will give limited connection to most of the settlement including the proposed Phase 1 a Community Hub. This arrangement will not encourage patterns of sustainable movement.</p>
	Figure 9.1 Concept Masterplan	<p>Comments on the Concept masterplan are as follows:</p> <ol style="list-style-type: none"> a. The degree to which the indicated SUDS meet any requirements or standards is not explained or referenced. Areas of SUDS vary within differing parts of the

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		<p>masterplan. E.g. Phase 1 has a chain of SUDs to a linear corridor of open space while other areas have much less capacity indicated</p> <p>b. The proposed graveyard /cemetery locations comprise two areas near Church Whitfield and a much larger area to the north of the site . The rationale for the location and size of the areas indicated should be provided and alternatives considered. Do they allow for Whitfield alone or other parts of Dover District. The appropriateness of the use to all of the areas shown is questioned. The provision of a 'green burial' ground is a possible feature to be incorporated and this feature could be more multifunctional.</p> <p>c. The use of Church Whitfield Road and Napchester Road as alignments for secondary Roads should be clarified /reviewed. These should be kept as informal non vehicular rights of way to retain the banked sunken character and hedges which would otherwise be lost with any 'improvements'. This approach is later supported e.g. in Para 9.98, 9.99 and 9.101. The location of secondary roads distinct from the retained lanes should be clarified.</p> <p>d. The crossing of the open spaces with the primary roads needs to be carefully detailed to minimise visual disruption and the outward and inward views along the open spaces. Suitable earthworks could reduce impact in character</p> <p>e. There is limited open space to the south east of the scheme around Light Hill and south of Archer's Court Road. There should be adequate provision of usable open space within each neighbourhood</p>
9.4 – 9.5 & Appendix 1	Green Infrastructure	<p>The broad approach to provision of GI by reflecting the existing resources and pattern of landform is welcomed. One objective is to ensure there will be no significant effects on the neighbouring SACs. To achieve this there should be early provision of new open spaces.</p> <p>There is emphasis on the provision of high quality semi-natural spaces. Natural England's ANGSt standards should be referenced to Appendix 3 P13 in the text .</p>
9.15	Policy CP11 Criterion vi - GI	<p>The approach of providing a 'protective landscape margin' around the village appears to be variably utilized. In some locations an extension of the existing fabric is indicated while in other locations there is an area of structural landscape.</p> <p>The opportunity to enhance and increase landscape belts to the adjacent trunk roads is identified and acceptable. However these would form less attractive recreational areas of open space where in close proximity to the roads particularly where these are at grade or on embankment.</p>
9.16	GI Features	The range of facilities mentioned is supported.

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		It is recommended that the range of features explicitly support target habitats in the Kent Biodiversity Action Plan. In particular there would be potential benefit in creating more species rich chalk grassland and scrub in addition to the woodland areas mentioned.
9.18	Outdoor Sports facilities	An area of 10.74 ha of sports pitches is indicated for the development. How this matches any existing standards and meets any deficiencies in the area should be clarified and whether there is a potential for offsite provision/contributions as a partial alternative. The number of likely pitches required and locations should be included in a landscape masterplan. Changes in level may direct facilities to certain locations. (An initial assessment would indicate that 10.74ha would equate to an area equivalent of c. 7 junior and 7 senior football pitches). The disposition of the main areas of open space meant that it would not be possible to include any sports pitches within Phase 1 of the development (although shown to the south east corner on the GI Figure 9.4) due to the relatively narrow areas that are indicated, (the landscape belts indicate a maximum of 40m width where a minimum of 55m is required for a junior football pitch). (<i>NB Evidence base recommends that ' A minimum standard of provision of 1.27 hectares of playing fields per 1,000 people should formally be adopted by Dover District Council'.</i>)
9.19	Allotments and Community Gardens	An area of 2.87 ha of allotments and community gardens is indicated for the development. How this matches any existing standards and meets any deficiencies in the area should be clarified.
9.20	Cemeteries and Churchyards	An area of 10ha for cemetery and churchyard use is indicated for the development. How this matches any existing standards and meets any deficiencies in the area should be clarified.
9.69 & 9.80	Light Hill	The planting to the A256 is considered to primarily provide mitigation from the impact of the road (noise separation and visual) and although able to be used for public access the corridor is only c 15-20 wide .
9.70		Three storey development close to some of the ridgelines will create prominent built forms on higher ground as seen from the corridors of structural landscape and from the countryside to the east including the North Downs Way. The location of the higher blocks should be included on a plan and cross sections showing densities and building heights. Without appropriate consideration of this information it is possible that the retained corridors of open space will be subsumed in the new development pattern and the existing landscape pattern will be lost.
9.81		<ul style="list-style-type: none"> The areas of downland scrub and grassland would be of ecological benefit but would provide limited visual mitigation from the A2. Cross sections of the proposals should be provided to ensure appropriate mitigation is provided for

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		<p>residential areas.</p> <ul style="list-style-type: none"> The use of low density housing closer to the A256 is likely to have limited benefit as in combination with the rest of the development to the west it would appear as part of a larger area of development. The c. 15-20 wide belt will soften the built form but is likely take at least c. 15-20 years. The treatment of the built frontage to Archers Court Road will need to be sensitive to the retention of existing hedges and hedgerow trees – (it should follow Appendix 4 para 4.25)
9.82	Parsonage Whitfield	Typo . A2 should read A256
9.84	Setting of Church Whitfield	While it is important that the setting of the listed church is protected it is not clear where the requirement to 'preserve and enhance' the setting of the rest of the hamlet originates from as it is not a conservation area.
9.85	Cemetery	The requirement for a large extension to the churchyard and cemetery is not explained. It is thought to constrain the potential for enhanced integration of the hamlet with Parsonage Whitfield
9.90	Densities	The description of the area and the lower densities to the perimeter e.g. to Church Whitfield would suggest that densities in Parsonage Whitfield should be less than 32dph as this still represents the highest density to existing areas in Whitfield .
9.91	Landscape Design	The use of sycamore, ash and beech would involve large canopy/forest trees in residential areas. These should be mixed with middle sized trees e.g. native cherry and field maple. The use of beech is questioned on chalk with lower water tables.
9.92	Open Space	The significant area of green amenity open space between Parsonage Whitfield and Shepherds Cross is supported
9.97	Shepherds Cross	The significant tree planting and green spaces adjacent to the A256 only appear to be c. 10-15 in width. It is questioned if this is wide enough for adequate structural planting and screening of the development . A width of c. 30m would be more appropriate.
10	Delivery and Phasing	
10.2		The proposed anti-clockwise phasing of the development in the Draft SPD is designed to be compliant with Policy CP11 and in particular criterion ii) and iii). However it is considered that the proposed will prejudice the proper delivery of the whole scheme. Phase 1 – Light Hill is a much denser development and will not include the full range of facilities including range of housing types or the full range of GI features that are present in the scheme as a whole. The proposed phasing plan does not deliver, ' all forms of infrastructure'. While there are local areas of GI and perimeter planting to soften boundary features or interfaces with existing house or roads there is a clear gap in the provision of large scale GI.

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		<p>The approx area of shown on the Draft SPD Phasing pan</p> <table border="1"> <thead> <tr> <th></th> <th>Phase 1</th> <th>Phase 2</th> </tr> </thead> <tbody> <tr> <td>Strategic open space</td> <td>9.2 ha</td> <td>24.5ha</td> </tr> <tr> <td>Built development area</td> <td>46.3ha</td> <td>41.2ha</td> </tr> <tr> <td>Total area</td> <td>55.5ha</td> <td>65.9ha</td> </tr> <tr> <td>% Strategic open space of total Phase area</td> <td>16.6%</td> <td>37.2%</td> </tr> </tbody> </table> <p>Under the current proposals the first area of large scale open space between Parsonage Whitfield and Shephards Cross would only implemented, at the earliest point, after the 85% of the 1400 houses at Light Hill were built = c. 2017/18 or 7 years into the life of the development. If the open space was not implemented until Parsonage Whitfield was largely complete then it would be even longer before the open space was created and further time for it to become established for some uses e.g. sports pitches. This would be significant disadvantage for :</p> <ul style="list-style-type: none"> • The impression/ offer from the development that GI was a key part of the scheme • Existing residents who would have limited access to any areas of suitable open space • The potential adverse impacts on the neighbouring SACs from additional public pressure <p>It is considered therefore that the development will not be, 'in the right place at the right time'. An alterative phasing which combines a mix which includes parts of Light Hill, Parsonage Whitfield and Shepherds Cross as Phase 1 would be a notable advantage. This will give scope, albeit within a prescribed area, for multiple starts from different developers and an immediate link with community centre. This would help to establish sustainable patterns of movement that will reinforce the Whitfield community. It is not felt that this approach with suitable phasing boundaries to inhibit the other objectives of the development.</p> <p>The early provision of a large area of open space would be a major benefit as it would :</p> <ul style="list-style-type: none"> • Set a benchmark for high quality and quantity of GI to be at the centre of the development for new residents • Provide a full range of facilities relating to formal, informal recreation and semi natural open space • Provide a major asset for existing residents of Whitfield with direct links to the largest existing area of public open space in the village • In an early solution to the treatment of the interface with Church Whitfield and establishment of the new landscape 		Phase 1	Phase 2	Strategic open space	9.2 ha	24.5ha	Built development area	46.3ha	41.2ha	Total area	55.5ha	65.9ha	% Strategic open space of total Phase area	16.6%	37.2%
	Phase 1	Phase 2															
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		framework to respond to the existing settlement and new built character
10.19	Landscape Considerations	The argument for a more geographically contained area to restrict the visual impact on adjacent areas has some logic. However there is no reason why an alternative phasing scheme could not also deliver a range of further benefits e.g. areas of larger GI, elements of structural landscape (including areas beyond the phase) or wider connections to a GI network in advance of built development
10.27	Delivery Mechanism	The proposed Draft SPD approach of development in sequential phases/neighbourhoods rather than in parallel is an unhelpful and unnecessary constraint and should not be part of the delivery mechanism. If followed it could limit the development of whole development if there were any delay in the Light Hill neighbourhood.
10.31		The approach for each Phase meeting its obligations for infrastructure is reasonable. However it is not clear how this would work e.g. in the delivery of GI that would follow in a latter phase.
10.34	Management Arrangements	The management of a number of the facilities will need a clear structure in place as part of any planning application /Section 106 agreement. In particular the open spaces, rights of way, semi-natural areas, sports pitches, SUDs , allotments etc will all need a clear management structure and funding for the continued upkeep. The intended approach for this key aspect should be set out more clearly in the SPD (including a signpost to Appendix 5 para 5.5) . It is indicated that the Parish Council could have a role which is possible however the likely costs and funding sources would need agreement at an early stage to ensure viability.
Appendix 1	Environmental and Utility Considerations	
1.15	Green Infrastructure	The structure and approach to play areas throughout the development should be included as part of the GI provision
Appendix 2	Infrastructure Requirements	
	Green Infrastructure	<ul style="list-style-type: none"> • Playing pitches and outdoor sports facilities – the likely range of facilities should be established. The scope to share facilities with schools should be included. • The range of play facilities seems very low for a 5,750 dwelling settlement. In particular 1 LEAP and 1 MUGA would seem a very low provision. The scope for LLAP and LA should also be include • The levels of provision for the cemetery and churchyard should be justified • The timetable to the right hand column should be clarified to which facility • The location of the 75.63ha of greenspace should be identified

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	Principle WUE 5 Design and layout	It is unclear why the new development should have to respond to the existing building traditions of Whitfield – as it is largely lacking in locally valuable architectural features
Principle WUE 9	Green Infrastructure	Support Proposed Principle
Principle WUE 10	Ecology and Biodiversity	Support Proposed Principle
Principle WUE 11	Open Space Network	Support Proposed Principle including use of ANGSt.
Appendix 4	Design Codes	
	Landscape Design	Landscape Design – the principles are generally supported. Planting - The reliance on certain mature canopy trees in neighbourhoods should be carefully tested. E.g. the potential damage by horse chestnut leaf miner, health of beech and nuisance factor of sycamore. Alternative smaller /medium trees should be include in the mix