

Urban design response to Supplementary Planning Document Whitfield Urban Expansion

Rummey Design, 22nd November 2010

Section 1 Introduction

1.1 Introduction

In November 2010 Rummey Design were commissioned by Pentland Homes to provide a response to Dover District Council's supplementary planning document (SPD) for Whitfield Urban Expansion as part of the public consultation process. This short report addresses points of concern for Pentland Homes in relation to Whitfield Supplementary Planning Document, focusing on matters relating to urban design and phasing. The report covers transport and green infrastructure matters briefly however reference should be made to separate reports for more detail on these areas. This document supports the representations made by Pentland Homes on Dover District Council's website in relation to the SPD.

1.2 Purpose of the report

Pentland Homes have the option to develop the neighbourhood referred to within the SPD as 'Parsonage Whitfield'. The report seeks primarily to put forward a sound case to promote an alternative phasing plan to that that currently proposed by Dover DC within the Whitfield SPD. A description of the alternative phasing plan is given in section 2. In section 3 a reasoned argument is given for the relative benefits of the alternative phasing plan over that proposed by Dover DC. An analysis of the potential problems resulting from Dover DC's proposed phasing plan is also provided.

Section 2 Alternative phasing plan

2.1 Current Phasing Plan description

The current phasing plan shows that phases are generally analogous to neighbourhoods and will be developed in an anti-clockwise manner.

Phase 1 – Lighthill, extension to Whitfield

Phase 1 a – extension to Whitfield

Phase 1b – District centre

Phase 2 – Parsonage Whitfield and Shepherds Cross, extension to Whitfield

Phase 3 – Napchester Whitfield , extension to Whitfield

Phase 4 – Lenacre Whitfield

Phase 5 – Temple Whitfield, extension to Whitfield

The SPD states that individual neighbourhoods should be developed in sequence to avoid piecemeal development.

2.2 Alternative Proposed Phasing plan description

The proposed phasing plan is shown at appendix 1. The proposals are as follows:

- 1 Commence construction of the new junction on the A256 (as proposed within Dover DC plan) and the new open space (O2) to the west of the Parsonage Whitfield concurrently;
- 2 Commence construction of 400 homes within the northern half of Lighthill;
- 3 Commence construction of Parsonage Whitfield simultaneously with construction of Shepherds Cross and the new district centre

The main access road will be constructed at two ends following the construction of the A256 junction. This will allow the early establishment of the Bus Rapid Transit system (BRT).

The phasing sequence would ensure that open space 'area O6' shown within figure 9.1 of the SPD would be completed prior to the occupation of any new homes within Phase 1. This would mitigate potential increased recreational pressure on the adjoining SAC. This is discussed further in section 3.

All new services including gas, electricity and water will be supplied off the new junction on the A256 in line with the aspirations of Dover DC.

Section 3 Analysis of benefits of alternative phasing plan and failings of Dover DC phasing plan

3.1 Introduction

Seven key areas have been assessed initially to demonstrate the relative benefits of the alternative phasing plan in comparison to the Dover DC plan. These are as follows:

- 1 Open space and green infrastructure;
- 2 Economic viability of the district centre;
- 3 Developing a public transport orientated development;
- 4 Achieving a target of 30% affordable housing;

- 5 Disturbance to residents;
- 6 Delivering the masterplan vision;
- 7 Delivering renewable energy and services.

In addition to these seven areas the merits of the alternative phasing plan have been evaluated against the criteria which have been used as part of the sustainability appraisal of the SPD undertaken by Scott Wilson on behalf of Dover DC.

3.1 Open space and green infrastructure

Under the EC Habitats Directive 1992 and the Conservation of Habitat and Species Regulations 2010 (which shall be referred to as the Habitat Regulations through out the report), local authorities must undertake appropriate assessment of all 'land-use plans'. The Whitfield Urban expansion area lies in close proximity to the Lydden to Temple Ewell Downs Special area of conservation (SAC) which is covered by the regulations. A Habitats Regulations Assessment (HRA) of the SPD was undertaken by Scott Wilson on behalf of the Council.

In order to minimise and avoid any significant impacts resulting from increased recreational pressure on the adjoining Special Area of Conservation (SAC), adequate mitigation measures must be in place, prior to the occupation of new dwellings in line with the Habitat Regulations.

One of the most effective measures for reducing recreational pressure on the SAC is to provide high quality, substantial areas of open space which are well connected to the existing green open spaces. Under Dover DC proposals, Phase 1 does not contain any substantial open spaces as indicated on Figure 9.1 of the SPD.

Only one area of 'open space' (08) is provided within Dover DC's phase one. This is a small, relatively isolated area of open space. Other areas of green infrastructure within phase 1 are referred to as 'greenways'. These areas will provide significantly less recreational space than those shown in Dover DC's Phase 2 area which include open space areas 05, 06 and 07. Open space area 06 connects to the wider countryside to the north and the existing recreational area in north Whitfield.

In conclusion bringing forward phase 2 will provide a significantly larger area of better connected open space in the first years of the development and as a consequence be more effective in reducing recreational pressure on the SAC in comparison to Dover DC's phasing plan as well as providing more open space earlier on in the process for new and existing residents. The alternative phasing plan would also result in substantial areas of ecological value being provided at a much earlier date than under the Dover DC proposals.

3.2 Economic viability and vitality of the district centre

In order for a new mixed-use district centre to thrive, a sufficiently high supporting population is required around the centre. Policy CP11 within the core strategy states that the site will comprise retail, and eating and drinking establishments. The district centre is due for construction in Phase 1b to run roughly concurrently with Phase 1 housing at Lighthill. Whilst there will be a small urban extension to the south of the district centre (phase 1a), housing at Shepherds Cross (the main neighbourhood encapsulating the district centre) will not be commenced until around 2019 under Dover DC's plans. To ensure the early establishment of a thriving mixed-use district centre, which can be easily reached on foot and by cycle, a greater population is needed to be centred around the district centre at an earlier date in the construction process. This could be achieved through an alternative phasing plan that brings forward phase 2 to phase 1.

The lack of supporting population is likely to result in a lack of vitality within the district centre. There are numerous examples of dull, unoccupied district centres resulting in unsafe, ghetto like development. Without a sufficiently large and dense supporting population, cafes and

restaurants and bars are unlikely to survive. This in turn would deter future investors and occupiers and lead to a further degradation of quality. These negative factors will be difficult to overcome at a later date, it is better to ensure a strong population is provided as early as possible through revisions to the phasing plan.

3.3 Developing a public transport orientated development

Good public transport links need to be established at a very early date. The early provision of the Bus Rapid Transit system (BRT) will encourage new residents to get into the habit of using public transport from day one. The failure to provide an early link between the district centre and Lighthill under Dover DC plans will mean that a single BRT which transports residents from the district centre to housing areas to the Dover Station can not be supplied in the early stages of the project. Under Dover DC's phasing plans the delay in linking the main access road from the district centre to the A256 is likely to encourage residents of Lighthill to drive out to White Cliffs business park for shopping and food or out to Dover and beyond, placing an added burden on the existing road network.

3.4 Achieving a target of 30% affordable housing

In appendix 2 of the SPD (infrastructure requirements) it is stated that it will be unlikely that the 30% target for affordable housing will be met owing to the high infrastructure costs placed on the developer of phase 1. This is a major concern. It will result in a failure to evenly distribute affordable housing across the scheme in line with government guidance. The alternative phasing plan would spread the cost of infrastructure provision between three developers and allow the early provision of much needed affordable housing and ensure that large, grouped areas of affordable housing are avoided.

3.5 Disturbance to residents

Dover DC have expressed a clear wish to minimise disturbance to residents by providing a clearly phased development that ensures each neighbourhood is developed sequentially. Their plan shows that development would be undertaken at both Lighthill and the new district centre concurrently. As a result some disturbance to residents of north Whitfield will be experienced under both options. We would conclude that the alternative phasing plan would not represent an increase in disturbance to residents of Whitfield in comparison to Dover DC's plan.

3.6 Delivering the masterplan vision

The SPD states that the vision will '...establish a series of linked neighbourhoods around the village of Whitfield to preserve the distinctive character of Whitfield and Church Whitfield, create a cluster of individual places each with a special character while allowing each neighbourhood to make an individual contribution to the whole...'

The key point made is that the development should comprise of a series of linked villages. The Dover DC phasing plan will deliver the largest neighbourhood first; Lighthill. This neighbourhood will have 1400 homes. An alternative phasing plan would deliver three neighbourhoods (one partially) under phase one. Two of these neighbourhoods would be separated by a large open space (open space area 06) which would strongly instil the vision of the masterplan, namely a series of linked villages at a much earlier date than under the Dover DC phasing plan.

3.7 Delivering renewable energy and services

The alternative phasing plan will deliver greater lengths of the main access road at an earlier date than that proposed under the Dover DC plan. This road is critical to delivering a district heating system and new infrastructure such as optical cables.

3.8 Appraisal against Sustainability Criteria

The following sections appraise the relative benefits of the alternative phasing plan against criteria used by Scott Wilson on behalf of Dover DC in their sustainability appraisal of the SPD.

3.8.1 Opportunity for GI to be integrated as part of the extension

The alternative phasing plan will not increase the amount of GI however it will provide a greater, better connected area of green infrastructure at an earlier date than under the Dover DC proposals. The early establishment of such an extensive area of GI (primarily open space 06) will mitigate against the expected increased recreational pressure on the SAC as well as providing a better quality of living for new residents.

3.8.2 Sustainable drainage

A change in phasing is unlikely to effect this.

3.8.3 Incorporation of a renewable energy scheme

The early completion of the main access road under the alternative phasing plan would allow renewable energy options such as a district heating loop to be brought on line at a much earlier date than that proposed under Dover DC's plan.

3.8.4 Well being of existing residents, good access to services and facilities

At the heart of the plan is the proposed district centre at north Whitfield. Under the current proposals the district centre will not be linked to the phase one housing until around 2019. This will mean that an efficient, simple public transport system utilising the BRT connecting the railway station, new housing and the district centre will not be implemented until well into the project. Achieving a public transport orientated development is at the heart of the core strategy and the SPD and this needs to be achieved as early as possible.

The economic viability and vitality of the new district centre will be dependent upon reaching a critical population in close proximity to the centre. It is unlikely that the residents of Lighthill will travel to the district centre in the absence of an established link between them and the district centre.

3.8.5 Ability to retain views through Napchester Valley

Phasing is unlikely to effect this.

3.8.6 Linked to GI ability to allow opportunities for walking and cycling

The alternative phasing plan will provide a larger area of GI with better links to the surrounding countryside and recreational areas within Whitfield areas at an earlier date than that proposed under the current phasing plan. The early establishment of a large, well connected GI is critical to encouraging walking and cycling and thereby reducing recreational pressure on the SAC.

3.8.7 Protection of the SAC.

The alternative phasing plan will provide a greater, better connected area of green infrastructure at an earlier date than that proposed under the Dover DC plan. The early establishment of GI will minimise the expected increased recreational pressure on the SAC. It is questionable whether this can be achieved through the current phasing plan owing to the relatively low levels of open space within Phase 1.

3.8.8 Maintenance of connections to the countryside from the existing villages

The sustainability appraisal highlights the importance of the links between existing villages but fails to acknowledge the importance of links between the villages and Whitfield and the new development. The plan which is currently proposed is in danger of isolating the villages and Whitfield from the new development and creating a 'them and us' scenario.

3.8.9 Avoidance of impact on important listed buildings

The alternative phasing plan would bring forward work within the neighbourhood of 'Parsonage Whitfield' to Phase 1. This could allow the earlier establishment of green infrastructure to protect the setting of St Peter's Church, Church Whitfield.

3.8.10 Reducing disruption to residents

These matters have been addressed under section 3.5.

3.8.11 Minimise pressure on the existing road network

The failure to provide an early link between Phase 1 Lighthill and the new district centre by means of the BRT is likely to increase car use by Lighthill residents and increase pressure on the existing road network. The alternative phasing plan develops a greater proportion of housing along the BRT route at an earlier date than that currently proposed under the Dover DC plan, thereby providing greater support for the BRT.

Section 4 Summary and Conclusions

The alternative phasing plan is a preferable option to that proposed under Dover DC's phasing plan for the following reasons:

1. Provides greater areas of GI at an early stage to minimise increased recreational impacts on the adjoining SAC;
2. Delivers public transit orientated development and the BRT at an earlier date;
3. Delivers the vision of a connected series of villages at an earlier date;
4. Ensures the economic viability and vitality of the district centre;
5. Provides a more sustainable development by encouraging the establishment of the BRT earlier, supporting the district centre earlier and provides a better connected cycle and footpath network at an earlier date.
6. Provides more affordable housing at an earlier date and a more even distribution of affordable housing across the site.

These points are all critical to the success of the plan and logically suggest that the alternative phasing plan is preferable to that proposed by Dover DC.

Whitfield Supplementary Planning Document – Representations

Rumney Design, 22nd November 2010

Section 1

1.2 'The scheme put forward by the masterplan is aimed at providing a mix of quality housing...'
Affordable housing needs to be delivered to achieve this mix.

Page 8, Appendix 2 'The principle aim will be to ensure the provision of 30% of all housing over the development period to be affordable. However... it is accepted that in the early phases of development, particularly Phase 1... this may not be reached.'

An alternative phasing plan could spread the costs of infrastructure development across three developers and allow for greater proportion of affordable housing to be delivered in phase 1.

1.7

The phasing plan currently promoted will initially create a single, large neighbourhood with only a relatively small amount of open space which is poorly connected to the wider environment. The vision for a series of linked neighbourhoods, and a cluster of individual places each with its own character will not be achieved until much later in the project. An alternative phasing plan which brings forward phase 2 could deliver this vision earlier, through the inclusion of smaller character areas with larger areas of open spaces than that currently proposed.

1.14

The current phasing fails to address the need for the early establishment of substantial areas of Green Infrastructure and fails to provide adequate connectivity by means of the BRT between Phases 1 and the District Centre.

Section 2

Principle CP 11

The current phasing proposals show that the Lighthill area will be developed in entirety prior to developing areas around the proposed district centre. The local residents of Lighthill are less likely to walk to the district centre than residents of the proposed adjoining neighbourhoods of Shepherds Cross and Parsonage Whitfield. In order to ensure the early successful establishment of a large district centre, a sufficient population within walking distance should be established as early as possible. The current phasing proposals are not conducive to sustainably developing the district centre.

Section 4

4.4 Table 4.1

In line with the HRA, alternative areas of green space need to be provided at early stage prior to occupation of dwellings. The table highlights that green space should be one of the first elements of Phase 1 required. The table also highlights the need for monitoring to review the effectiveness of new green infrastructure. The phase 1 area does not contain any substantial areas of open space, comparable with that within phase 2. The open space within Phase 1 proposed is relatively poorly connected to existing greenspace. The early establishment of a large and high quality open space is critical for the SPD to meet the requirements of HRA. We believe that the phasing plan currently proposed will not be as effective in reducing recreational pressure on the SAC when compared to a phasing plan that brings forward phase 2.

Section 5

5.42 The description of Area C is an oversimplification. Whilst the land to the west and in the centre is clearly open and devoid of hedgerow vegetation (prairie like), this is not the case for the land to the east. This area comprises a number of small-medium scale fields with a relatively intact hedgerow system with a small copse adjacent to Church Whitfield. Much of the eastern area is visually enclosed by the natural topography and enclosing vegetation. This area would warrant a character area of its own. It could not be described as 'prairie fields' although this is a valid description for the western edge and central areas of character area C.

5.58 Listed Building Conclusions, St Peters Church

We support the desire to keep the rural character of Church Whitfield and Church Whitfield Lane. However there may be a case that some traffic calmed vehicle links between the development and Church Whitfield is desirable in order to avoid Church Whitfield becoming excessively isolated. We do not believe this option has been thoroughly explored in the SPD. A degree of openness should be maintained around Church Whitfield to protect its setting however this should not be excessive. It is unrealistic to expect the settlement to be totally visually and physically disconnected from the new settlement nor is it desirable.

Section 6

Table 6.1 highlights the need for significant areas of GI. The current phasing would mean that one of the largest areas of open space (within phase 2) would not be undertaken until 2017. We believe that an alternative phasing plan, that brings forward Phase 2 would provide a more effective means of reducing recreational pressure on the SAC by the early supply of a large area of well connected open space.

Table 6.2 highlights potential for a district heating system. This could be brought on at an earlier date through an alternative phasing plan which completes a larger section of the main access road thereby allowing an earlier installation of such a system.

6.30 We would seek clarification on any time restrictions relating to a new bus gate and the implications of this for existing residents of Church Whitfield and Whitfield. How would the council ensure that only buses and existing residents could pass through the gate? There is a real concern that the development is in danger of becoming unconnected from Whitfield and a 'them and us' scenario could develop. A total lack of vehicle connections between new and old Whitfield is not conducive to creating a sustainable development.

6.31 - 6.32 comments as above

6.36 CP11 points to the need for a bus rapid transit system. The current phasing option does not allow for a simple, efficient system that connects both Lighthill (phase 1) and the new local centre in north Whitfield at the outset of the project.

6.42, Key messages arising

We would question the viability of a sustainable local centre under the current phasing proposals plan.

Section 8

8.1 The adopted core strategy emphasises the need for affordable housing. The current phasing plan will not result in affordable housing targets being met in Phase 1. This will result in a failure to evenly distribute affordable housing across the scheme. An alternative phasing which brings forward Phase 2 is needed.

Section 9

Comments on Figure 9.1 Concept Masterplan Diagram

We would question the extent and nature of the open space to the south of Church Whitfield. A smaller area of recreational open space would be more appropriate than a large graveyard. A more detailed assessment of the Church Whitfield needs to be carried out in order to ascertain the exact extent of open space that is appropriate. We support the principle of protecting the setting of the hamlet. However we do not believe that the hamlet should be totally isolated either physically or visually from the new development.

It is unclear from the plan how residents of Church Whitfield will be able to access their dwellings if bus gates are to be placed on Napchester Road and Archers Court Road.

9.3 The document states that secondary and primary roads are to be fixed. We believe there needs to be a degree of flexibility in regards to these roads. For example the existing 'dell' at Parsonage Farm could provide an excellent neighbourhood centre. However for this to work the main road would need to move further north. The masterplan is insufficiently developed to allow us to fix these secondary and primary road locations at this stage.

Figure 9.2 shows a tertiary road along the line of an existing narrow green lane – ER62. This option may not be viable if the existing hedgerows are to be kept in line with policy CP11 of the core strategy. We believe the main access road should move north to provide a better connection to a potential neighbourhood centre at Parsonage Farm.

Figure 9.3 shows a graveyard to the south of Church Whitfield. We believe this is an inappropriate landuse. A smaller area of recreational open space would be more appropriate.

9.5 We believe that an alternative phasing plan which brings forward phase 2 would provide a larger and better connected network of open spaces and green infrastructure at an earlier date than that currently proposed within the SPD.

9.7 A public transport oriented development would be achieved at an earlier date through alternative phasing arrangements. These arrangements would develop larger lengths of the primary access route at the outset of the project, connecting new housing to the new district centre by means of the BRT. This will encourage residents to get into the early habit of using the BRT rather than relying on their car. The current phasing plan will delay this connection.

9.15 The new green infrastructure surrounding the existing development should be fronted on new development wherever possible.

9.20 We do not believe the site is suitable for a graveyard.

9.26 We do not believe that the proposed phasing will sustainably support the local centre at the north. Phasing should be amended to allow the construction of more dwellings closer to the local centre in phase 1.

9.27 A degree of flexibility in relation to primary route should be allowed.

9.46 The effectiveness of the public transport link to the local centre is questioned due to the fact that the currently proposed phasing plan will result in no connection between phase 1 and the local centre until 2017.

9.57 The decision to develop Lighthill as a single phase reduces opportunities for greater open space allocation in early stages of the project (in line with HAR requirements) and fails to connect the new housing with the new local centre at an early stage.

9.83 – Whilst the PROW to Whitfield needs to be protected, more justification is needed for this to be

the northern edge of the development. Views to Rosemont Cottage in Church Whitfield need to be retained however this does not preclude some small areas of development to the north of the PROW.

9.85 – A graveyard will fail to provide an attractive, useable area of open space to the south of Church Whitfield.

9.91 What evidence is given for the need to use beech, sycamore and ash as a predominant canopy tree?

The setting of the church needs to be protected but the exact extent of open space needs to be carefully reviewed. There is insufficient evidence to justify the extent of open space currently proposed.

Section 10 – Delivery and Implementation

10.2

Objection – An alternative phasing plan which brings forward Phase 2 should be undertaken. The current phasing plan fails to physically connect the neighbourhood centre and new housing at Lighthill until 2017. This will mean that the BRT is less effective. Phase 1 provides less open space up front in comparison to phase 2 and that open spaces is also less well connected. Thus it is less effective in meeting the requirements of the HRA to reduce future recreational pressure on the SAC at an early stage.

10.22

The economic viability of stores and restaurants is questionable under the current phasing proposals. The residents of Phase 1 Lighthill are less likely to walk and are more likely to drive out of Whitfield for services rather than use the district centre.

10.24 Proposed phasing delivers very little green infrastructure in comparison with Phase 2 and fails to promote sustainable links to the district centre.

Appendix 1

An alternative phasing plan could deliver more development within 400m of the main access road at an earlier stage than currently proposed. This would be in line with the concept of walk able neighbourhoods.

Appendix 2

The table highlights that affordable housing provision may not reach required levels in phase one due to the costs of early infrastructure development. This is a major concern as it will result in the creation of large blocks of affordable housing in the remaining phases, rather than an even spread throughout the development in line with government guidance. An alternative phasing plan, bringing forward phase 2 would allow three developers to spread the costs of the new road and junction onto the A256 and allow affordable housing targets to be met in Phase 1, thereby meeting the requirements of the core strategy.

Green Infrastructure – It is unclear which elements will be developed when. The proposed masterplan (figure 9.1) does not appear to show any sports pitches within the Lighthill area in Phase 1 but they are indicated on Figure 9.3. This should be clarified.

Appendix 3

Phasing WUE 14 – objecting

An alternative phasing plan which brings forward Phase 2 should be undertaken. The current phasing plan fails to physically connect the neighbourhood centre and new housing at Lighthill until 2017. This will mean that the BRT is less effective. Phase 1 provides less open space up front in comparison to phase 2 and that open spaces is also less well connected. Thus it is less effective in meeting the requirements of the HRA to reduce future recreational pressure on the SAC at an early stage.

Appendix 4 – Design codes

Clarity needs to be given on whether these are codes or design guidance. Key dimensions of streets are given including frontage distances. There should be additional flexibility in relation to front garden distances on secondary streets.

4.25 – We question why these properties have to be accessed from the rear.

4.31

Building plots – There needs to be some flexibility in relation to corner plots, it may well be appropriate in some cases to have a door on the minor street rather than the main street. Some flexibility with justification is needed.

Kevin to review building code with input from Pentlands homes