

Number	ID	Full Name	Organisation Details	Your Representation - Are you:	Summary of Representations	Detailed Representation
1.2	138	Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Should reflect the wording in the Core Strategy policy " comprising at least 5,750 homes supported by..."	Delete "at some". Insert "comprising at least"
1.3	139	Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Delete unnecessary wording covered by National guidance.	Delete " most will.....Standards".
1.7	141	Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Wordy and unnecessary.	Delete "while.....whole". Delete last sentence.
1.1	144	Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Support base and viability	While a wide range of supporting information has been provided there appears to be little information to support the commercial viability of the proposals or to compare alternative options viability.
1.12	147	Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Speed of masterplan process.	The SPD has been put together in a very short period of time, with critical support material not being made available to interested parties until very late in the process - including after the consultation was launched! This is a major scheme which will take decades to evolve and a little time now could make a significant difference. Crest, representing three major landowners, would be prepared to constructively contribute to further forums chaired by the District Council to amend the emerging SPD to improve the masterplan in terms of providing a quality development.

1.13	149 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	SPD does not go far enough in terms of ensuring the appropriate managing and delivery of infrastructure and development. There needs to be a recognition of commercial interests which could dictate the pattern, speed and quality of development.	<p>Insert new paragraph. " No permissions will be granted until the Council has approved a comprehensive Delivery Framework which demonstrates how in accordance with Policy CP11 the whole of the development and infrastructure serving it can be delivered and funded including details of construction access minimising disruption to existing residents and landowners who will need to manage their land until their land is brought forward for development. Prior to commencement of each phase it will be necessary to demonstrate to the Council that proposals do not in any way prejudice the whole of the development being delivered, and each phase will be required to contribute fairly and proportionately towards the overall infrastructure requirements in accordance with the Delivery Framework." The Delivery Framework should include, inter alia: plans for all infrastructure components - which serve the UEA as a whole allocating infrastructure to phases and trigger points cost estimates a framework for financing these costs a strategy for construction access the governance and management arrangements By seeking to identify the strategic infras</p>
1.14	157 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	Sequential phasing will lead to a reliance on a single developer effectively determining the direction and pace of delivery which may not be in the interests of all parties.	<p>seeking to identify the strategic infrastructure requirements at an early stage, it will help to ensure the viability of later phases is not prejudiced by disproportionate infrastructure costs and that all potential economies of scale are identified.</p> <p>The wording should be replaced to allow a more flexible approach to phasing but specifically requires developers to demonstrate how their development will minimise impact and disruption to existing residents and landowners. See the seperately submitted reps from Crest Strategic Projects as to an alternative possible approach.</p>

1.19	158 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Comments in respect of points 5 & 6.	<p>5. There are significant risks associated with the phasing arrangement proposed in the current SPD. In particular these are associated with the ability for one party to control the timing and pace of delivery of the whole development due to the SPD requirement for one phase to be substantially completed prior to another commencing. This issue is compounded by the phasing of access junctions, and thus creates the possibility of both timing and access ransoms occurring. This situation is directly opposed to the intent of policy CP11 which requires implementation of the whole development. Should this situation develop it potentially wrests control from the Council. The phasing should be reconsidered to avoid this eventuality. 6. The masterplan should remain flexible to accommodate inevitable changes that are likely to occur while the development is underway. The current level of information in respect of phased infrastructure during the course of the whole development is completely inadequate and requires further to sit alongside a delivery plan to test viability and ensure that infrastructure</p> <p>are proportionately borne across the phases. This will ensure that the implementation of any one phase does not prejudice the delivery of the whole. As it stands this element of the SPD does not comply with the Core Strategy policy CP11.</p>
2.2	160 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	Relationship with Policy CP11.	<p>CP11iii - SPD is not prescriptive enough. The delivery of infrastructure on the site may be left to the developers, however the greater infrastructure provision and environmental performance targets should be addressed in this SPD. CP11iv - The SPD fails to identify in either fig 9.1 or 9.3 connections to the wider countryside or across the A2 with sufficient clarity. This work needs to be informed by the work being carried out in parallel by Dover in their Green Infrastructure SPD. In addition the possible impacts resulting from an unspecified Park and Ride facility should be assessed at this stage. Such a facility will, if required, have a major impact on the masterplan.</p>
3.3	165 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	Availability and completeness of evidence base.	<p>A significant amount of the evidence base was not available on the Council's web site at the start of the consultation process. Some remains inadequate - lack of appendices or drawings to accompany the Water Cycle Study.</p>

3.8	167 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Public space and design variety	Public Space - Issues identified through the public consultation include ' independent phases each with its own public space...' This would appear to contradict both figure 9.1 and the sequential phasing where development in some phases is reliant on public open space provided for elsewhere within the strategic green infrastructure. Detail is required over the distribution of the key types of strategic green infrastructure ie sports pitches etc. Design Variety - The public consultation identified that the the designs should not be the same. This is contradicted by Appendix 4 which shows little variation in the design that would result from the imposition of the design codes proposed.
4.3	171 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	Compliance with the Habitats Regulation.	It is unclear from the evidence base that the emerging SPD Masterplan provides clearly enough to accommodate appropriate mitigation for its impacts on either a permanent or an interim basis. This work is inadequate and requires to be reviewed and enhanced.
4.4	173 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Phase 1 Greenspace.	The SPD advises that phase 1 greenspace should be provided as one of the first elements.However, phase 1 is notable for it's lack of such green space. The inadequacy of provision on phase one cannot necessarily be made up on subsequent phases, even if that is deemed an appropriate basis for the distribution for open space.
5.8	175 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Cycle route.	KCC cycle routes should be shown on the SPD Masterplan
5.1	176 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Open Space provision in Whitfield.	Reference should be included to the 'notable deficiency' in the public open space in Whitfield Ward referred to in the Barton Wilmore Quantitative Assessment.

5.47	177 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Supporting	Green Infrastructure	We support the importance of the role of Green infrastructure.
5.48	179 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Landscape distinctiveness.	The SPD identifies complementing the discrete landscape parcels around the fringe of Whitfield as a landscape priority. This contradicts the SPD masterplan which shows prominent tree and hedge boundaries subsumed within the development. The SPD should resolve and clarify the design requirements for such 'landscape parcels'. Suggest substituting the words 'educational opportunities' for 'outdoor classrooms'
5.58	181 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Setting of Temple farm.	There is a conflict within the text of the SPD and the masterplan which needs to be resolved. The SPD needs to be revised to provide consistency between the text and the masterplan to show an appropriate protection to the setting of the listed buildings within the green infrastructure. The SPD shows part of this area retained as agricultural. Is this right when it is within the overall development area for the UEA?
6.1	183 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Challenge the presumption re phasing.	What justification is there for the proposed phase 1 being treated fundamentally differently to other areas of Whitfield? It is Crest's assertion that other options for early access e.g a new roundabout at the Sandwich Road junction with the A256, are equally able to come forward early independently from the current proposals or in tandem to facilitate multiple starts.
6.3	185 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Conflict with Neighbourhood Design Codes.	The reference to changes in the Building Regs bringing forward modern/ innovative design appears to contradict Appendix 4 Neighbourhood Design Codes. SPD should clarify the delivery and phasing of the new trunk water main and how that works with the proposed phasing strategy. Previous iterations of the Masterplan showed 4 energy centres - now the draft SPD shows 3. Clarification is required.

6.5	186 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Provision of SUDs.	The SPD should provide more flexibility. SUDs elements can only be applied where appropriate. The typology will be determined by drainage, access, management, and of course underlying ground conditions.
6.7	188 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	Number of junctions off the A256.	Whilst the initial modelling states that one junction or two work as well - in respect of access, there has been no evidence of any testing of the wider benefits of a different access option. Whilst the access strategy has been developed to a very detailed level as far as the south east corner is concerned no other options have been tested to the same degree. This is very important as it heavily influences the masterplanning and phasing strategy. A new roundabout at the Sandwich Road/ A256 junction would provide an alternative access which allows flexibility in how the phasing could be amended. refer to the details in the seperate Crest Strategic submission.
6.1	190 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Number of junctions off A256.	The SPD outlines an aspiration for new development not to add to Whitfield roundabout. This will be easier to achieve with 2 access points from the A256 at the outset. It also would enable construction traffic to avoid existing and new residents and allow greater flexibility for farmers to manage their land in the area until such time as it is developed.
6.11	191 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	South east corner phase 1.	The relationship between the phase 1 land and Dover is only apparant on plan. Because of the A2 and A256 barriers the SE corner has no closer relationship to Dover than any other part of the UEA. This could be mitigated by links across the A2. However, these appear to be more aspirational rather than required and necessary infrastructure. It could be argued that starting phase 1 around the Community Hub would not only provide much needed facities to Whitfield but also allow the new residents to form a real connection with Whitfield rather than a theoretical connection to Dover.
6.15	193 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Seperate BRT junction.	Why?

6.16	194 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Park and Ride	The SPD should resolve and clarify its design requirements for the P & R facility prior to finalising the SPD
6.19	196 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Sandwich Road Junction A256	Converting this junction to a roundabout would enable construction vehicles to access the UEA, diverting traffic further away from existing residents and spreading its impact as well as reducing new residents journey times - rather than focusing all journeys through one junction with associated heavier traffic flows. Concerns relating to 'rat running' can be managed through conventional traffic management measures. The creation of a second access to the A256 overcomes the issue of all subsequent phases being ransomed by the phase 1.
6.2	199 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	A256 junction.	We disagree that improvements to this junction should wait for phasing of development. early improvements to this junction will enable development to proceed quicker and support delivery of the District Centre at the northern end of Sandwich road.
6.25	203 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Upgrade costs to Whitfield roundabout.	The SPD should have a framework in place for management of costs to future Whitfield roundabout upgrades. This would ensure that the burden of these costs is spread fairly across all the developers.
6.34	206 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	SPD transport detail.	The SPD has an opportunity to be prescriptive regarding its transport aspirations. This para places the onus on the developers to suggest transport infrastructure needs.
6.43	213 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	New link across the A2.	There needs to be more information about the delivery of the proposed footway/cycleway link across the A2 as part of phase 1 or at a later date but with phase 1 making due allowance for it in layout terms. More detail is required to justify the number of energy centres being proposed, their phasing in respect of development and location.

7.7	221 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Comments on Option E choice.	Option E is noticeably overdeveloped in the south east corner with minimal green space provision. The principal highway serving the new development leads to the new roundabout at the A256 which will create a very urban edge along the road at this point of the site. Compared with other neighbourhoods, access to amenity space is poor as this area of the site is bounded on two sides by the A2 and the A256. This area would benefit the most from access and amenity space, particularly if, as suggested elsewhere in the SPD, this is phase 1 as the introduction of a significant number of new homes with no significant greenspace provision would create pressure on existing amenity/recreation facilities. A footprint combining elements of option F and E would appear to be more appropriate. In addition: Light Hill is very prominent from the North Downs Way - which is another reason for limiting its development density or providing additional screening. Proximity of Option E to Church whitfield is tight. The buffer zone to the A2 and A256 is insufficient.
8.4	228 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Infrastructure requirements.	Early phases of development should contribute towards the overall infrastructure costs of the WUE, and not simply be allowed to use up existing capacity, without making proportionate contributions. This would ensure that the viability of later phases is not prejudiced by being required to bear a disproportionate level of infrastructure costs. This should be captured in a Delivery Framework Plan.
9.1	241 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Whitfield Development Objectives.	Point 2. The SPD needs to go further to protect its sustainable infrastructure aspirations. Clear differentiation is needed between infrastructure elements provided by developers without compromising SPD values and core elements likely to prove contentious given the landownership; duration of the programme; multiple planning applications and phasing should be clarified in the document. A strategic framework for infrastructure spanning phases and ownership should be established in the SPD. Point 4. It is possible to provide multiple starts which would provide numerous benefits to the community and minimise disruption from construction traffic.

9.3	245 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Road Hierarchy Plan.	The P & R is not indicated on the Road Hierarchy Plan. The size of such a facility would have a significant impact on land take and the distribution of land uses. The SPD needs to address its provision. In order to do this it would be necessary to review the viability of such a proposal not least to assess the level and timing of contributions to be made from future planning applications. A greater commitment should be made to the potential BRT/footway/cycleway across the A2. Å
9.4	246 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	Green Infrastructure Strategy Plan.	The 'WUE bespoke' approach should be justified, to ensure consistency between the evidence base and its open space requirements. The SPD should outline the distribution of open space, particularly for formal sports provision, and ensure that each phase of development delivers either its own share of such provision within its phase or makes an appropriate contribution if provision is elsewhere. The deliverability of the Green Infrastructure needs to be detailed to ensure it is provided commensurate with development.
9.15	248 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Landscaping belts.	There appears to be a lack of consistency between the Green Infrastructure evidence Base and the SPD re the terminology used for describing these important areas.
9.2	249 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	Cemetery provision.	What is the justification for the cemetery being proposed at this location? Cemeteries are usually typical around churches - should it be located closer to Church Whitfield maybe on phase 1?
9.31	250 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Village extension density	Comments regarding density is contradicted by point 9.33
9.32	251 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Phase 1a delivery.	This paragraph suggests that the new district centre will be provided as one of the Whitfield extensions and as such will be in phase 2 rather than phase 1.

9.33	252 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Village Extensions Density	Density is contradicted by point 9.31.
9.34	253 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Village extensions - Newlands.	SPD should be worded to allow a degree of flexibility to reconfigure the present proposals.
9.52	254 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Ridgeline preservation.	Paragraph needs to be consistent with paragraph 9.102.
9.56	255 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Barrier planting.	There needs to be some clarity as to what is meant by 'significant'.
10.2	256 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	Phasing	We challenge the proposed phasing of the development. Although we do not object to the proposed Phase 1 coming forward early, there should be scope to open development on several fronts, particularly through enabling access improvements to be delivered earlier than currently proposed. The arguments presented in the draft SPD around preventing access improvements for being undertaken appear weak.
Table 10.1	257 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Delivery rate.	Delivery will be determined fundamentally in relation to the economic background, and the viability of the development. To restrict the number of outlets may well result in depressing delivery.
10.1	258 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	Sequential phasing.	There is no justification that a sequential approach will mitigate negative impacts. Indeed it could well cause negative impacts by leading to the lack of adequate infrastructure being provided to support development.

10.11	259 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	Substantial occupation.....	There is no tenable justification for this. This comment should be deleted from the SPD. It is important that the Council do not leave themselves in a position where they are ransomed by any one party's inability to complete or sell a particular phase.
10.15	260 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Infrastructure Origin	The SPD and its supporting documentation are not explicit in explaining how phase 1A will be serviced. The installation of new utilities to serve the District Centre will allow a number of different phasing options to be considered and questions the logic that the phasing should run anticlockwise from the south east.
10.16	261 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Gas Infrastructure.	the SPD fails to explain that the gas network will require downstream reinforcement before any addition to the development can take place. Though connection to the gas main in the south east corner makes sense for phase 1 the SPD does not explain how phases 1A and 1B will be accommodated.
10.17	262 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Electrical Infrastructure.	The SPD does not explain how phases 1A and 1B will be served given that the existing capacity of the existing 11kV network is extremely limited. The phasing relies on the assumption that a de-energised 11kV south of the development can be re-energised. However, if possible the cable will only have a maximum capacity to serve 50-60% of the predicted development load. Though the SPD mentions that the additional capacity is available via the utilisation of the PSS located to the north of the site at Betteshanger it is unclear why this approach is not adopted as a first choice.
10.18	263 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Water infrastructure.	The SPD fails to mention that there is insufficient water infrastructure in the area to support the development and that a new initial strategic sewage pumping station will be required in the north east of the site. From the pumping station a new pumped rising main running parallel to the new trunk main will head south west to Broomfield Park. Given that the phasing of the site is based in some part around the availability of the utilities infrastructure there is a compelling argument that the development is best suited to start in the north east of the WEA.

10.19	264 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	Landscape considerations.	The SPD needs to ensure that it is sufficiently robust to guarantee that each phase of development delivers or makes an appropriate contribution towards green infrastructure/open space. The delivery of this space needs to be more explicit to show how it will be delivered across multiple ownerships, and how it is managed in the long and short term.
10.22	265 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	Delivery of the District Centre.	We challenge the view that the proposed anticlockwise phasing will support the early delivery of the District Centre. There is no evidence to support this. We support the proposed location of the District Centre but would suggest that it's early delivery would be more secure through the commencement of development at the neighbourhoods bordering the District Centre.
10.27	266 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	Dealing with planning applications.	This is unreasonable and unjustified. The delay in dealing with planning applications beyond an 'initial stage' would prevent developers and landowners from taking advantage of favourable market conditions
10.29	267 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Trigger points.	These will require to be amended in the light of a final agreed phasing and Delivery framework Plan.
10.3	268 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	Guarantee of delivery.	The proposed mechanism does not guarantee delivery of strategic infrastructure. These issues need to be clarified in a Delivery Framework Plan.
10.31	269 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	Delivery.	Things should not be left to being provided 'in the round'. It is essential that there is a detailed costed Infrastructure Delivery Plan to minimise the risk that development occurs without the proper infrastructure being in place.
10.34	270 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Management arrangements.	The SPD must be sufficiently detailed to ensure that the long term management of the green infrastructure and open spaces is clearly established. Currently that is not the case.

Table 2.1	271 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Commenting	Trigger points.	The 'Broad timing ' is too general. This should be related to specific trigger points on occupation of units.
Table 2.2	272 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	Phase 1 Stand alone.	Phase 1 should not be considered on a stand alone basis. The overall requirements of the development should be assessed and costed. Phase 1 should not be permitted to proceed until it has been determined that it's carrying it's fair share of infrastructure cost, and land provision for amenity uses, as not to prejudice the delivery of later phases. This should be addressed in a detailed, costed Infrastructure Delivery plan.
Principle WUE 14	273 Mr Kevin Willcox	Strategic land Director Crest Nicholson	Objecting	Phasing.	Crest propose a fundamental revision to the phasing programme and mechanism for delivering enabling infrastructure across the WUE, based on closer collaboration between landowners/developers to bring forward access improvements, utilities and service infrastructure ahead of need. Please see the further information submitted separately.