

Whitfield Parish Council response to Planning Application DOV/16/01328

Outline application for the erection of 28 dwellings (all matters reserved apart from access) Land to rear of, Archers Court Road, Whitfield, CT16 3HP

Whitfield Parish Council Object to this application for the following reasons:

- The land is not suitable for development;
- The land is allocated as open space and safeguarded;
- Development will adversely affect existing Residents;
- Development will have unacceptable effect on the natural environment; and
- There is inadequate infrastructure to support the development.

1. The Land is Safeguarded by Policy TR4

The site should not be developed as it is land which has been safeguarded for the A2 Widening / Junction works by DDC Policy TR 4. Although there are no current plans for such a scheme, the land has been safeguarded to allow for future road works such as a grade separated junction at the Whitfield Roundabout site and / or any necessary realignment of the existing A2 to facilitate other Roundabout improvements.

2. The Land is allocated as open space

The site is allocated as Open Space on the Proposals Map. All such areas must be protected and retained for recreational use and to maintain the character of the local area.

A site visit would show that, this important amenity area is well used for recreational purposes and there is evidence of children's 'camps' and other play activities, along with the well worn network of paths that criss cross the whole site - The area is well utilized.

3. The Site is not included in the Site Allocations Document or Whitfield SPD

This application is on a Greenfield site that is not included in the Local Plan and it has not been fully appraised by the LDF Site Allocation process or the adopted Whitfield Expansion SPD. The application is, therefore, contrary to guidelines for land use and the aforementioned documents.

The application should not be determined in isolation and must be assessed through the Whitfield Masterplanning Process and the LDF Site Allocations Document alongside all other proposed developments in the Parish of Whitfield and the wider Dover District.

Important details are missing from this outline application. A lengthy list of reserved matters and outstanding issues is anticipated, which must not be delegated to planning officers: such matters must be brought back to the Planning Committee, thus allowing the opportunity for further public comment at the detailed planning stage, if the application progresses.

4. Adverse effects to existing Residents

There is strong local opposition to development of this site.

The access road will enable overlooking, security issues, noise and nuisance to existing properties and gardens either side of the access road, resulting in loss of amenity for existing residents.

The size and scale of the proposed properties will be unacceptable and affect amenity of property in Archer's Court Road, Courtland Avenue and Newlands.

5. Unacceptable environmental impact

This application is on a Greenfield site.

It's proximity to woodland protected by TPO's has not been assessed for likely future pressure to fell protected trees, nor does the application state if any protected trees will be removed for the access road or for the development.

There is no clear information on any requirement to clear trees and saplings not protected by the TPO's in the construction area - Our estimate is that 50 or more unprotected trees will have to be removed.

This land is ecologically important for wildlife and should not be developed in an area that is already losing much of the Greenfield land surrounding the Village to development under the Whitfield SPD.

6. Noise from A2 exceeds acceptable levels

Future Residents of this development will suffer excessive noise from A2, too much for residential development. It is unacceptable to have development in an area that will be affected by constant noise to this extent.

This is a Material Consideration that must be fully evaluated and taken into account as part of an outline application.

The National Planning Policy Framework (March 2012) states that:

"planning policies and decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;"

While the NPPF has a "*Presumption in Favour of Applications*", it should be remembered that the NPPF also has a requirement to avoid noise that gives rise to adverse impacts on health and quality of life.

See: NPPF Clause 109 - The planning system should contribute to and enhance the natural and local environment by: preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability;

Development should not be allowed in an area where the existing noise levels exceed recommendations. The proposed mitigation measures are inadequate and do not take account of residential use of gardens and outside areas.

The applicant's site is below the level of the A2 and the surrounding trees act as an amphitheatre that concentrates the noise within the site.

A DDC Planning Officer's comments were referred to in an earlier application. In para 3.10 of the applicant's D&A statement it says;

“The applicant’s pre-application submission flagged up potential noise implications, the officer commented on the noise of the traffic during her site visit, claiming that it was overwhelming”.

The World Health Organisation (WHO 1999) Guidelines for Community Noise:-

“The extent of the noise problem is large. In the European Union countries about 40 % of the population are exposed to road traffic noise with an equivalent sound pressure level exceeding 55 dB(A) daytime and 20 % are exposed to levels exceeding 65 dB(A). Taking all exposure to transportation noise together about half of the European Union citizens are estimated to live in zones which do not ensure acoustical comfort to residents. More than 30 % are exposed at night to equivalent sound pressure levels exceeding 55 dB(A) which are disturbing to sleep. The noise pollution problem is also severe in cities of developing countries and caused mainly by traffic. Data collected alongside densely travelled roads were found to have equivalent sound pressure levels for 24 hours of 75 to 80 dB(A).”

This development will exceed these levels!

7. Increased traffic and inadequate access to site

The development will result in an overall increase in traffic onto Archer's Court Road, the junction with Sandwich Road and onto Whitfield Roundabout, especially at peak times.

Access arrangements are inadequate, unclear, not fully detailed. The access is onto Archer's Court Road is in an area where there is regular congestion and queuing to get onto Sandwich Road and the Whitfield Roundabout and will cause additional hazard and problems on this busy and congested road.

There is no detail on how the access junction and road will be upgraded to accommodate the extra traffic generated by 28 new dwellings and for construction traffic.

8. No provision or assessment of community and social infrastructure

The application does not appraise or make any provision for providing any of the elements of social and community infrastructure that will undoubtedly be required to support the development. This is contrary to planning requirements.

The Village of Whitfield, the road network, schools, health care, community services and other infrastructure will be under immense pressure from the 5750 new houses already proposed for Whitfield. Provision made within the Whitfield SPD is widely considered to be inadequate and to be delivered too late to meet the growing demand.

Extra development will exasperate the situation simply to provide financial gain for the speculative landowners who put land forward.

The impact this development will have on infrastructure set aside for the Whitfield expansion is not assessed.

For example, the delay of provision of the first Primary School and Healthcare provision within the Whitfield SPD is justified by use of spare capacity at Green Park Community School and existing Doctors' Surgeries in the area. This capacity now appears to be double booked to support Old Park Hill and other developments within Dover District. We can only assume that this spare capacity is now to be triple booked for use by occupants of these extra 28 dwellings.

A more joined up approach and full assessment is required.

9. No assessment of wastewater and sewerage disposal

The existing infrastructure for wastewater and sewerage in Whitfield is inadequate and at capacity. There are many problems accommodating the capacity increase from current developments.

There is no assessment or provision for this in the application.

10. Overdevelopment of existing Village

It is unacceptable to have any further sites developed in the Parish of Whitfield.

Whitfield has already been sacrificed for DDC's ambitious plans for 5750 new dwellings in the Parish. This application has not been assessed as part of the Whitfield Masterplanning process or the LDF Site Allocations Process and should not be considered for approval.

Smaller developments and infill within existing Whitfield built area will have a massive impact on the density of the existing Village and on the feeling of overcrowding within Whitfield. Whitfield is already suffering from continuous applications for backland development. With the expansion of Whitfield in the SPD it is vitally important that the existing village's character is retained as much as possible.

Increasing the density of the existing area with further development is unacceptable.

11. Five Year Housing Supply

Any argument that the development should be allowed due to a shortfall in the Council's 5-year housing supply is questionable.

It does seem somewhat ridiculous that a historic shortfall from some years ago makes any ad-hoc, ill advised and environmentally unsuitable application acceptable. Especially in light of the fact that in the past few years land has been reserved for over 8,000 dwellings in the District through outline applications, the Core Strategy and various SPDs.

If the rather arbitrary period under consideration was pushed back far enough, there would be a shortfall of tens of thousands in the housing supply. However, in practical terms looking forward, there is adequate land supply for the next 5 years.

Whitfield Parish Council ask that this application is rejected or, at the very least, deferred until a site visit can take place to assess the impact it will have on the local area, Residents and the degree of noise generated by the A2 Trunk Road.