

Whitfield Parish Council Response to:

Application Number DOV/17/00546: Erection of 100 dwellings (including 30 affordable homes), new vehicular and pedestrian access, internal access roads, car parking, landscaping, provision of 3.3 hectares of open space including a locally equipped area for children's' play

Whitfield Parish Council object in the strongest possible terms to this application.

The Parish Council also fully support the numerous objections to this application that have been made by Residents of Whitfield and the wider area.

This application is the latest in a long line of applications which have all been found to be unacceptable. A further reduction of the number of dwellings is not good planning practice for sustainable development, neither are the material considerations made any more acceptable by this reduction. It is simply the tactic of the developer to water down an unacceptable application; to maximise the short term financial returns; and to pressurise DDC to accept the early development of the site; all of which is contrary to the Whitfield SPD which clearly states that the site should **EITHER** be developed in tandem with Phases 4 and 5 of the Whitfield Urban Extension, **OR**, that suitable vehicular access arrangements are proposed and that it demonstrates resolution of all infrastructure matters, having regard to the trigger points set out in the SPD and the results of the monitor adjust review process.

The fact that Highways Agency and KCC cannot be bothered to object to the proposals do not make the transport or access arrangements acceptable.

This application fails to fulfil these requirements and so must be refused.

Whitfield WUE SPD states in Para 5.168 that development can only take place independently of the Temple Whitfield main development provided that:

"it can be demonstrated that its development is acceptable in highway terms, that suitable vehicular access arrangements can be achieved for development and construction traffic, that the character of Singledge Lane is respected and the delivery criteria identified in Chapter 6 being satisfied. If suitable access arrangements cannot be achieved or if the site comes forward as part of the Temple Whitfield neighbourhood then it is likely that the new A2 roundabout will be required. Owing to highway constraints on Singledge Lane the area of land can only be developed when suitable access for the development and construction traffic has been agreed with the Planning Authority and Highways Authorities for the area"

Paragraph 6.8 - Criteria 3 States that an application for an extension can only be granted if the application can:

"demonstrate resolution of all infrastructure matters and is in all other ways acceptable"

Paragraph 6.8 - Criteria 9 States that an application for an extension can only be granted if the application includes:

"Phasing proposals to demonstrate how development will be related to the provision of infrastructure having regard to the trigger points set out in the SPD and the results of the monitor adjust review process."

1. The application is contrary to the Whitfield Urban Expansion SPD

This development should not be allowed until Phases 4 and 5 of the WUE and provision of the associated infrastructure to support this village extension is in place.

The key point is that all the requirements in the SPD must be adhered to and, if they are, then it's almost certain that this development cannot come forward at this time.

It is important that the expansion of Whitfield is properly managed as required by the Core Strategy and the WUE SPD Masterplan. The phasing schedule and conditions contained within the SPD protects the community from the effects of ad-hoc building activities and lack of provision of the whole range of infrastructure.

Applications from developers and landowners outside of the phasing schedule undermine the process and are motivated by self interest, with the sole aim of achieving early profit from their site. This application will do nothing to benefit or add to the development of Whitfield.

The development of this site should not proceed: It is in direct contravention to the phasing schedule currently in the Whitfield SPD, which shows this site to be scheduled for development in tandem with Phases 4 and 5, unless it is fully supported by adequate and timely provision of all infrastructure and utility upgrades. Assessment of development at this site must include consideration of the adverse effects it will have on the wider Whitfield Urban Expansion proposals contained in the Whitfield SPD Masterplan.

2. This application lacks much of the detailed information and documents that are required for a full application.

There are a lengthy list of matters which are not addressed by the application, and that demonstrate this proposed development should be refused. To proceed would require these matters to be referred back to the Planning Committee for decision, with provision for further Public Consultation to be made on these matters, prior to final approval and construction.

- i. Construction Management Plan, including construction vehicle routing, siting of construction improvements and details of a monitoring regime.
- ii. Construction noise assessment mitigation measures.
- iii. Limit on hours during which construction works are permitted.
- iv. Utilities provision details, including details of the proposed means of foul and surface water disposal.
- v. Surface Water drainage scheme, based on sustainable drainage principles, including management and maintenance.
- vi. Details of requirements for Social and Community Infrastructure improvements.
- vii. Monitoring measures – which would help monitor the success of the scheme
- viii. Programme of archaeological work to be undertaken and the results submitted as part of the reserved matters application, including details for provision of finds being featured in the village centre.
- ix. Ground contamination investigation report and risk assessment, including mitigation.

3. The application lacks the necessary infrastructure provision to support it.

The lengthy list of infrastructure issues include; lack of improvement to the currently inadequate existing road network (for both construction and new residential traffic); poor design of access onto the site; narrowness of Singledge Lane; inadequacy of the junction for access and egress onto and off of the A2; added congestion and highway safety issues; lack of provision of improvements to the utility Infrastructure (foulwater drains, pumping capacity and surface rainwater drainage provision is currently over capacity); lack of provision of Local Community infrastructure improvements, such as schools and healthcare, in Whitfield.

4. Scale of development and significance of impacts

It is essential that this Village extension is developed in tandem with Phases 4 and 5 of the WUE to ensure adequate access and infrastructure arrangements are in place to minimise the impact to existing residents.

The 2001 Census shows that the Parish of Whitfield contained 1806 dwellings and a population of 4438. The proposed development adjacent to Singledge Lane is for the construction of 100 new dwellings. The overall impact of such a large development in proportion to the existing community is undoubtedly significant and will have significant impact on the environment, infrastructure provision and the Residents of Whitfield.

The proposed development of this site represents a 5% increase in the size of the existing village, will add 250 to 300 residents to the population and add approximately 150 cars (extrapolated from the 2001 census) owned by this new population.

The number of residential dwellings will significantly affect community facilities such as schools and doctors, and all other community infrastructure and facilities. From the 2001 census, the development will add over 30 primary aged and 20 secondary aged school children and 30 additional residents aged over 65 to Whitfield's population. The fact that the proposals are for family homes will probably double the school aged children predicted.

The current school and doctor surgery are oversubscribed, so assessment of adequate provision must be included in the application, along with assessment for all other community services.

5. Transport and Access

The proposed development is expected to generate significant extra traffic from the construction and operational phases. Direct access to the A2 is required and will be provided via a roundabout as part of the Phase 4 and 5 infrastructure. Development prior to this link to the A2 is unacceptable.

Key questions need to be considered:

- Is there a safe access?
- Would traffic from the development be significantly hazardous to drivers or pedestrians?
- Is Singledge Lane wide enough?

The current properties served by Singledge Lane and the junction with the A2 have higher than average occupancy by older and retired residents that have lower than average car

ownership and car usage per household. The proposed development will be predominantly family homes with correspondingly higher than average car ownership and usage. The current catchment area that uses Singledge Lane is thought to be approximately 200 to 250 homes, so traffic volume will increase by at least 50%.

Singledge Lane is too narrow to accommodate the traffic from the A2 junction to the entrance of the development site. Acceptable road width will need to accommodate 2 cars passing and a pavement, and will require land grab from existing residential gardens.

The current junction with the A2 is inadequate and there are no proposals to improve accessibility to and from Singledge Lane. Lengthy queues form along Singledge Lane onto the A2 and the central reservation refuge lane for right turn, inbound traffic movements, is not sufficient or safe. At peak times the refuge lane fills and, at times, tails back onto the A2. This will become more frequent with the obvious significant increase in risk of rear-end collision with fast moving traffic exiting Whitfield Roundabout on the A2 towards Canterbury.

Arrangements for monitoring and management of traffic are inadequate and lacking in the necessary detail to ensure safeguards to control and mitigate increased traffic volume that will be generated from the built development and during construction.

This application should not be approved without commitment to proper transport measures and an effective Traffic Monitoring and Management Scheme.

6. Water Resources and Flood Risk

There is no legally binding provision of water supply and wastewater disposal by the developer, at the developer's expense, in this application. This must be made a condition, to ensure funding of the work as part of the utility provision. The systems are currently inadequate with frequent local flooding and backing up of the existing sewerage system that this development will depend upon and the local water authority is under no obligation to upgrade the system, so it must be funded in full by the developer.

This developer has a poor record on this precise issue, as demonstrated by the lack of provision made at Bowman's Place by Abbey Homes.

The junction of Singledge Lane and Nursery Lane frequently floods and is a recurring problem that will be exasperated by surface water run-off from the site.

7. Social and Community infrastructure provision

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 Social and Healthcare provision within the Whitfield SPD is justified by use of spare capacity in the area. This capacity now appears to be double booked to support 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 100 dwellings. A more joined up approach and full assessment is required.

Any contribution towards the Health and Social Care Centre in the Village Centre must result in the Health Centre being built and services being provided from the Centre, rather than an empty plot of land for future use at an undetermined time.

The rapid growth in the population of Whitfield necessitates immediate provision of Health and Social Care Services, which are currently at capacity.

Provision of community and social infrastructure must be made within Whitfield.

8. The high degree of local disruption that this development would cause both during construction and from continuing activities associated with the addition of 100 homes in the area.

There will be unacceptable disturbance and pollution (airborne, light and noise pollution) to neighbours and the locality with excessive impact upon near neighbours; with no resolution to the traffic and flooding issues that already blight the area; which has initiated such strong opposition to this application.

A development of the proposed size will have a significant impact on the present semi rural aspect of Whitfield and, therefore, the current amenity enjoyed by existing Residents. The impact of the development and its construction, by its nature, will affect the existing residents to varying degrees, with those who live adjacent to the development area being most affected.

9. Air Quality and Noise

Significant environmental effects are anticipated from construction activities of the proposed development which are unacceptable. It is estimated that there will be up to 60 car and 40 HGV movements along Singledge Lane each day from the development construction (figures taken from similar development elsewhere).

It is estimated that the number of households served by the junction onto the A2 will double with no significant improvements to the junction that will enable the greater volume of traffic to be safely handled. Queuing and congestion at peak times will undoubtedly increase dramatically with a proportionate increase in pollution and noise.

10. Landscape and Views

The site adjoins one of the lower density areas of Whitfield, which is predominantly single storey bungalows, so a high density development of 2 to 3 storey dwellings will have significant adverse effects on local landscape, character and views to and from the site. A significantly larger buffer zone is required between the development and existing properties to avoid overbearing impact and overshadowing of existing properties.

To Conclude:

There is so much missing from the application and so very little in its favour.

The questions that all the Whitfield Residents continue to ask are very relevant and should be taken into consideration as part of this latest application for the early development of Singledge Lane.

The wellbeing, amenity and needs of the local community must be put before the desire of the developer in this application.

Please honour the commitments made to Whitfield's Residents in the MasterPlanning Process and the SPD.

Whitfield Parish Council consider that this application should be rejected for all the above reasons and taken to appeal if necessary.