

CPRE Kent

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Swale Borough Local Plan – Main Modifications

Matter 3: MUX1 South West Sittingbourne

Matter 3

ID429231

Representation

Number: LP736

3.1 Is the allocation justified by robust evidence, including landscape character assessment and Sustainability Appraisal as the best option for delivering the borough’s housing.

3.2 Deliverable within the Plan Period?

3.3 Supported by robust infrastructure planning? Have all the infrastructure implications been identified and addressed in appropriate detail?

4.4 Supported by clear and deliverable measures to address transport implications of the proposed development?

1. Given the position of Sittingbourne in the settlement hierarchy, it is appropriate that the Council considers whether there are suitable sites available. As a function of being the principal urban centre, sites at the urban edge of Sittingbourne are an appropriate location from which to seek to meet a proportion of the borough’s housing target. Sites at Sittingbourne are likely to be considered broadly sustainable in terms of access to employment, transport and services. Indeed, the council has done this and a significant proportion of the housing supply has been proposed to be met at Sittingbourne.
2. It is abundantly clear that the availability of sites will not be a constraint on housing supply in the Swale Borough. The key risks to delivering a five-year supply in the early years of the plan are associated with the economy, industry construction capacity (given the abundance of development sites associated with emerging plans in neighbouring local authority areas) and highway capacity and resilience. The oversupply proposed by the council to give room for manoeuvre to deliver a five-year supply will not help resolve these issues, since large sites in this location will only tend to deliver around 50 homes per year. In the absence of any evidence from developers of a planned and feasible increase in industry capacity, this number will not increase greatly in the short to medium term.
3. Potential sites must, of course, be considered in detail (and in consultation with the community and stakeholders) to ensure that the impacts are understood and satisfactory mitigation can be planned for and delivered. The urban edge of Sittingbourne is constrained in many ways, with worrying congestion and air quality problems, sensitive and valued landscapes, and high quality agricultural land. Not only that, but with the past expansion of Sittingbourne, valuable gaps between it and neighbouring villages have been reduced to the point where they are close to disappearing.
4. **CPRE is of the view that this proposed allocation should be deleted from the plan.**
5. Numerous objections have been received from local residents to this proposed allocation. In the Council’s responses to concerns that the site assessment process has been rushed, there is an emphatic defence, setting

out the long evidence base preparation process. CPRE asks that the Inspector appreciates that the long and complicated local plan preparation process (and the associated evidence base) will not have been closely followed and interrogated by all residents in the borough. This is, in part, an indication of the unsuitable nature of the site. It is highly likely that many residents thought that a development of this scale and in this location would not be countenanced by Swale and so paid less attention than they might have.

6. Concerns raised by local people at this stage in the process should be carefully understood and assessed. Meaningful public participation is important and the Inspector should ensure concerns about an allocation made at this late stage are not dismissed without discussion. The vast number of changes to the local plan, including very large additional sites, means that objectors may well provide 'soundness' reasons that trigger further amendments to the plan.
7. On a similar vein, it is a particular concern of CPRE, that given the Inspector's questions on infrastructure planning for discussion, the current attendance list to the examination hearings, does not include representatives from the Council's transport consultants, Kent Highways or Highways England. This is a key issue relevant to this site and the statutory consultees should be available to assist the discussion. Although KCC are advising the Council that further VISUM modelling is not necessary, this position has not been explained anywhere in writing so that that objectors can understand the reasons and justifications for this position.
8. This proposed allocation, together with other local plan allocations associated with the A2 and A249, will put additional road traffic on an already congested local and strategic road network. Despite this being a key issue for the borough, the evidence base is not complete in this regard. Despite a substantial investment by Swale Borough Council in the VISUM Transport Model, Swale Borough Council is determined to rely on outputs resulting from testing of high level options a number of years ago. This modelling did not incorporate detailed site locations (that reflect the proposed suite of sites) and cannot be assumed to be a satisfactory assessment of the cumulative impacts of development. Proposed development sites and a range of interventions to encourage a modal shift should now be subject to testing by the transport model. Canterbury and Maidstone Local Plans, both at advanced stages have benefited from frequent 'runs' of the same model as sites have changed and interventions are proposed. Many essential interventions, primarily aimed at encouraging a modal shift, will not be local plan led and should be contained in an up to date transportation strategy. This is another key piece of evidence that has not been completed at the time of writing this statement. **The site is not supported by robust infrastructure planning, nor supported by clear and deliverable measures to address transport implications of the proposed development**
9. It is the view of CRPE that the Council has not provided a proportional evidence base to assess the quality and capacity of infrastructure, determine the extent of infrastructure investment required and assess the financial cost and timing of this infrastructure on the deliverability of allocated sites. This is a significant soundness issue because congestion is a significant problem for this area. Focused studies on the A249 corridor and M2 Junction 5 are apparently underway, but not yet available. Evidence on the cumulative impact of the local plan on the local road network is not being prepared. **The Council has not demonstrated that this site is deliverable and sustainable.**
10. This point is reinforced by the Highways England response to the request for and EIA Scoping Opinion in which they state:

“Due to the scale of the development and its location we are concerned about the potential impact of development trips at M2 Junction 5 and the A249 junctions around Sittingbourne. For this reason we require a detailed assessment of the traffic impacts on the operation of the junctions. This is to ensure that the additional traffic from the development can be accommodated on the SRN without additional queues and delays.”

11. As this is yet to be delivered it is difficult to see how Swale Borough Council can form an opinion about the sustainability or viability of the site. Clearly, the cumulative impact of numerous developments affecting the same junctions makes this information even more critical.
12. Additional traffic congestion on the A2 is also likely to have a detrimental impact on local air quality. AQMAs in the town will find it more difficult to achieve air quality improvements if there is more congestion on the A2. This is not in the public interest. It is essential that care is taken to ensure that the cumulative impact of development on air quality will not prevent relevant limit values being met within the shortest possible time. The urgency of meeting limit values for air pollutants should not be ignored. This urgency was given emphasis by the November 2016 ‘Client Earth’ decision by the High Court. The court found that the Government’s Air Quality Plan should seek to achieve compliance by the earliest possible date, and that the Government has adopted too optimistic a model for future vehicle emissions. Development has the potential to increase traffic and congestion and cumulatively could prevent the desired air quality improvements in AQMAs. It is the view of CPRE that the Council should also seek to understand the cumulative impacts of development proposed in the Local Plan, particularly where it is closely related to the A2.
13. The only up to date summary of highway capacity and air quality on the A2 that seems to be available is the draft Swale Borough Council Freight Management plan (December 2016), which makes the following statements:

3.10 Swale has particular problems because of the high proportion of heavy goods vehicles in the traffic mix on key routes, in particular on the A249 and the roads approaching the A249 from the nearby industrial and commercial areas. Congestion and queues make emissions from heavy goods vehicles worse. The A249 has been dualled and could be considered well suited to carrying significant heavy vehicle flows as it is not close to the main residential areas. However, the congestion that arises at all the main A249 junctions in Swale, including at J5 on the M2, does create pollution which can migrate elsewhere.

3.11 The A2 also carries significant volumes of heavy goods vehicles. The road network in Swale is such that the A2 provides the only practical E-W link to certain parts of the Borough, such as between Sittingbourne and Faversham. Goods traffic is forced to use the road to access businesses operating from these areas. The A2 is an ancient route, single carriageway and unsuitable as a through route, for heavy vehicles in particular. In settlements along the route it has houses and other buildings close to the road, creating a canyon effect. This accentuates the problem of pollution by trapping the pollutants between the houses, thus worsening the problem for residents. This problem has led to the designation of 5 separate Air Quality Management Areas along sections of the A2 where the pollution thresholds had been, or were anticipated to be, exceeded.

3.12 Vehicle emissions can seriously affect the health of those exposed to this pollution. It is linked to increased incidence of lung cancer and heart disease. Also linked to low birthweight babies where mothers in the AQMAs have smaller children with less developed lungs for life. Addressing this is a key aim of this FMP through the various actions proposed to reduce freight vehicle emissions, directly

or indirectly. These health impacts also need to be taken into account in the location of new development as this will affect how many people are exposed to the emissions, for example in new housing developments.

14. In term of the actions proposed (which include M2 Junction 5 improvements , junction improvements on the A249 and numerous others) the following comment is made at para 7.17 of the document:

“It is by no means certain that they will all go ahead and even if they do it will be some years before they are completed. Even with these improvements there will still be local problems of congestion and air quality both resulting from and affecting freight traffic. There are already issues on sections of the A2 fronted by houses and on the A251, as well as on other local roads”.

15. As well as the effect on the main transport network, this particular development will put a great strain on the minor roads in the area. The local network at the site is already subject to congestion. This problem would become worse and the attractiveness of southern Sittingbourne as an alternative route to the A2 or A249 would increase to the detriment of attractive rural lanes, both in the vicinity of the development site and beyond. Junctions at Wises Lane with the A2, Adelaide Drive with the A2, Adelaide Drive with Borden Lane, Borden Lane with the A2 and Borden Lane with Homewood Avenue are likely to be impacted with the development, further reducing the resilience of the local road network.
16. It is understood that additional proposals are being proposed by the site promoter, which might offer an alternative access to the A249. CPRE can only make limited observations on this and points out that it is not a local plan proposal that has benefited from consultation. CPRE also points out that given the location of the site between the western side of Sittingbourne and the A249, it would only reassign a limited proportion of traffic on a short stretch of the A2. Local traffic from the site using services in Sittingbourne and commuter traffic seeking to travel east or west on the A2 or north on the A249 would not benefit from an A249 access at this location. It has not been shown to be possible, nor viable and the needs for detailed transport modelling would remain.
17. In terms of landscape, the site benefits from a detailed landscape and visual impact assessment. This has not been completed for all sites and therefore cannot be used as a means by which to compare sites. Although the site is not designated for its landscape character, the landscape is locally valued:
- It is easily accessible from the area using a range of public footpaths, including ZR117, ZR118, ZR119, ZR 120, ZR121, ZR120, ZR122. This is an important recreational resource, giving local people and other walkers access to tranquil countryside close to the urban area.
 - The site forms part of a valued local countryside gap which separates the settlement of Sittingbourne from Borden, a settlement which has been significantly enlarged over the last 40 years. The Borden Conservation Area Appraisal describes the gap between the village and Borden Lane as ‘very small’.
 - The landscape forms part of the agricultural setting of the Borden and Chestnut Street Conservation areas and a number of listed buildings.
18. Many historic field boundaries with a visual, archaeological and ecological value remain and the condition of much of the site is good. The presence of the urban edge has had a limited impact, the site retains a

moderate character and it is enjoyed and valued by local people. An unallocated site can still have a high value and this should be understood in the assessment process.

19. The settlement separation function of the sites also gives value to this landscape. Although it is accepted that designation as a countryside gap does not preclude development, it must surely be assumed this this is also with the proviso that a 'confident' gap that can that can preserve the separate identity of settlement can be maintained. This is not the case.
20. The development would amount to a detrimental impact on the character of this locally valued landscape. The attractive and tranquil rural approach to the settlement of Sittingbourne would be detrimentally affected. A KCC Rural Lanes Study¹ in 1997 identified lanes to the south of this site as being of highest value in terms of amenity, conservation value and historic value. Many of these rural lanes are shown on the proposals map. Increases in traffic will be detrimental to their rural character (and historic / biodiversity historic value) and the safety of road users.
21. Finally, it is with concern that the Local Green Space proposal at the junction of Auckland Drive and Borden Lane is already being eroded. This designation (that was proposed by the Council) should be capable of enduring and it is surprising that part of the land that the Council deemed to hold a particular local significance, is deemed appropriate for an access road.
22. While Sustainability Appraisal and 'the ranked assessment of reasonable site options', rightly assist with site selection, they are tools to assist with decision-making. In the case of 'landscape', for example, the assessment of sites does not assess whether sites are valued, only whether they are designated. Further, CPRE does not agree with the sustainability appraisal that a 'considerable' countryside gap remains at this location. They are useful but 'blunt' tools and decisions must also be informed by consultation and with knowledge of the sites themselves.

¹ [Rural Lanes Study for the Swale Borough \(1997\)](#)