

# CPRE Kent

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## Swale Borough Local Plan – Main Modifications

### Matter 4: AX2 Land West of Barton Hill Drive, Minster

#### **Matter 4**

**ID429231**

Representation

Numbers: 730

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

**These comments should be read alongside the detailed representation: LP730**

1. 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, or close to a designation. Site visit and detailed assessment is also essential. They are useful but 'blunt' tools and decisions must also be informed by consultation and with knowledge of the sites themselves.
2. Detailed landscape assessment of the site is primarily a comparison between this site and another site (Land East of Scocles Road). Only the 'Land East of Scocles Road' site appears to have a detailed Landscape and Visual Appraisal that was submitted with the site proposal. The comparison concludes development at the Scocles Road site would be the most harmful of the two sites. While this conclusion is correct, site selection is not necessarily an 'either/or' and it would not be appropriate to argue allocation of a site (such as Barton Hill Drive) which will cause substantial harm to the landscape, simply on this basis of this comparison. Other approaches to delivering the development strategy may be appropriate.
3. It is the view of CPRE that the character and value of the Barton Hill Drive site (which ensures that the open character of the countryside and long views associated with the Isle of Sheppey are relevant to the approach to Minster) is not given sufficient emphasis in the assessment. The approach to Minster from the west benefits from its extensive landscape setting. At present the urban edge successfully uses the landscape in such a way that its size and extent is not apparent within long views in the approach from the west. This is a key approach to Minster from which residents and visitors can appreciate the long views and open landscapes which define the character of the area. The 'value' of this, is not given sufficient weight in the Landscape Capacity Study.
4. On a similar vein, CPRE does not agree with the sustainability appraisal which simply explains that a 'significant' countryside gap will remain. The sustainability appraisal should recognise that part of the value of this countryside gap is an understanding of the importance of 'distance' in these views and their relationship with the sensitive marsh landscape to the south.

5. In terms of the overall assessment of sustainability, CPRE is very concerned that the important sustainability issue of transport is not supported by a sufficient evidence base to contribute properly to decision-making. In terms of Barton Hill Drive site itself, the appraisal recognises that improvements would be needed between the Cowstead Roundabout and Barton Hill Drive to address peak time queuing. The relationship between the site and employment and services is rather poor and it is inevitable that a significant proportion of the residents of development in this location will commute by car to employment. It is often reported that traffic can queue back as far as the dual carriageway (Cowstead Roundabout) in the evening rush-hour.

6. Given the lack of a robust evidence base for transport planning (which establishes the likelihood of interventions making the network sufficiently reliable to accommodate a substantially greater number of journeys to employment and services), CPRE cannot accept that an adequate assessment can be made. The sustainability appraisal (and Ranked Assessment of Non-Allocated Reasonable Site Options) does not consider transport/access to employment, and this need to be borne in mind when selecting sites.

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

**See above**

7. The Implementation and Delivery Schedule to the Local Plan (June 2016) makes reference to 'what is needed', and indicates that road widening and the replacement of the existing traffic signal junction at Barton Hill Drive is required. Costs, which do not include provision of land for the widening phase are indicated at 'up to' £6,000,000. This includes £1,600,00 for the roundabout element. Although the Council is confident about the prospects, stating *'the improvements to the junction at Barton Hill Drive and Lower Road are the subject of a funding bid to the Government's Local Growth Fund and have been afforded second priority in the region'*, this does not appear to apply to the widening of Lower Road.

8. The source and certainty of funding needs to be clarified. The submission to the Local Growth Fund<sup>1</sup> (round 3 bids in July 2016) are for only £860,000 which (although not specified) appears to be match funding for the junction (roundabout) improvements:

- "The A2500 Lower Road improvements scheme will improve the A2500/Barton Hill Junction, an existing pinch point on the network and a barrier to development on the Isle of Sheppey. The limited route options for traffic wanting to enter or leave the Island places a significant demand on the A2500 Lower Road across the typical weekday periods, particularly near the junction. The Island's tourism-related economy, coupled with the significance of the prison service on the Island (the largest employer on the Isle) gives rise to further peaks in traffic demand. Unsurprisingly, the cumulative pressures being placed on the A2500 Lower Road and its junction with Barton Hill is currently resulting in significant delays and issues concerned with journey time reliability for all users, which has reached an unacceptable level. In the context of the emerging Local Plan a proportionate amount of development allocations will bring the transport network under greater strain, with increasing focus on the need for significant upgrade. The rationale for the A2500 Lower Road highway improvements is to ensure the travelling public can place a suitable level of confidence in journey time reliability".

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<sup>1</sup> [Appendix B: Local Growth Fund Submission 25/07/2016](#)

9. In September 2016 Matthew Balfour replied to a letter from the 'Lower Road Campaign' stating:

"KCC has been successful in securing Local Growth Funding to implement a roundabout improvement at the junction of Lower Road and Barton Hill Drive, which is expected to be implemented in 2019. However, KCC does not have the capital resources to bring forward and implement pedestrian and cycle improvements to Lower Road in advance of a scheme of development being promoted at 'Land west of Barton Hill Drive, Minster' alongside other local schemes of development. There could be an opportunity to promote a funding bid in a future round of the Local Growth Fund, but we must manage expectations here somewhat on the basis that for a scheme bid to be successful there must be an element of match-funding, and the land required needs to be available. As matters currently stand these two criteria cannot be fully satisfied.

If 'Land west of Barton Hill Drive' is formally allocated by an Independent Government Inspector in the (currently) emerging Local Plan, which is expected to be adopted in Spring 2017, KCC officers would then work alongside any landowners and Swale Borough Council to promote pedestrian and cycle facilities along Lower Road."

10. The Council's summary of responses to this site (SBC/PS/117: Appendix 1/CSR/1), published in November 2016 makes the following statement:

*"The Council is strongly aware that many concerns relate to the existing transport problems associated with the A2500 Lower Road eastward from the A249 at Cowstead Corner. Whilst development on Sheppey will be expected to contribute to improvements to address this issue, both Kent and Swale Borough Councils are at an advanced stage in securing public monies to provide the necessary improvements both to address the existing conditions and deal with the growth arising from the Local Plan. As a result, the highway authorities are not opposing the allocation of the allocated site".*

11. Given the above, CPRE is still uncertain whether there are funding bids in place to deliver Lower Road widening improvements. Also of concern is the lack of an up to date viability study which confirms that the network improvement (whether or not match funded) can be delivered by development at Sheppey. This is a significant issue, since we know (according to the 0% affordable housing provision) that viability at the Island can be challenging. Residents are right to be concerned, since the roundabout at the end of Barton Hill Road should have been provided some time ago as part of a different scheme. Up to date viability assessment, that takes account of the substantial and essential (and yet unknown) costs of highway infrastructure is essential.

12. We have argued elsewhere in comments that highway modelling is required to understand if the improvements will deliver sufficient capacity improvements on the local and strategic network. Given the lack of a scheme, it is not possible to anticipate what landscape/ ecology implication there might be.

13. Local concerns are justified and understandable. CPRE understands that the capacity of Lower Road needs to be increased, and this (together with the addition of a cycle way) needs to incorporate road widening. More detail is required:

- Is there a scheme that shows capacity improvements are capable of being delivered?
- Is there an agreement that land is available for road widening?
- Is funding available for road widening proposals;
- Are development sites viable, taking transport contributions into account?

- Is there evidence to demonstrate that improvements to the 249 corridor (including junctions) will happen in a timely manner to release sufficient capacity on the network?

14. Without this information, it is not possible to assume this site will be deliverable within the period of the plan and it is insincere to argue that balancing of benefits and harms (necessary to come to conclusions on sustainability) can be satisfactorily completed. For example, the SA<sup>2</sup> states the following when generally discussing the transport and traffic element of the preferred approach:

*'the preferred approach performs best, even though it is acknowledged that this is not by a significant margin. This is largely due to outstanding or unknown impacts associated with further work required to assess impacts in the A249 corridor. However, the plan has in place the work required to address any issues arising'.*

15. The uncertainties associated with transport infrastructure and viability are not acceptable. It is recognised that Lower Road (as well as the A249 corridor and associated junctions) does not have sufficient capacity. This is an important issue, which, is key to the effectiveness of the plan.

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<sup>2</sup> SA Report Addendum: Non-Technical Summary (June 2016)