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Matters 2 and 3

Swale Borough Council  
Local Plan Part 1 Examination  
Further Representations

**Matter 2: Overall approach: development targets, the settlement strategy and the distribution of development.**

Matter 2.2

The continued insistence on concentrating growth of housing and employment in the west of the Borough is not justified because of the increasingly congested A249 corridor. The already assigned development north of the Key St. junction makes further development in this area unviable, even if the hoped-for, but undefined, junction improvements do eventually materialise. The same is true for Jctn. 5 of the M2, only more so since no account appears to have been taken of the massive proposed housing development at Detling, south of the M2. No improvements at Jctn. 7 of the M20 will push much of the increased traffic from this major development north to M2 Jctn. 5, thus exacerbating an already unsatisfactory situation.

The continuing absence of a SOCG with Highways England does not suggest that due attention has been paid to this critical aspect. Incidentally, the absence of such a document before the resumed public hearings is disgraceful and contemptuous of public consultation.

The obvious conclusion to be drawn from the above is that the percentage split between the two ends of the Borough is no longer fit for purpose and should be reviewed and amended before additional allocations south-west of Sittingbourne are approved, especially where this involves the destruction of BMV agricultural land.

Matter 2.5

As argued in the previous paragraph, the proposed modification cannot be regarded as meeting the requirement to minimise the need to allocate BMV land, particularly as land in the vicinity of Junctions 6 and 7 of the M2 has been rejected by the Council.

### **Matter 3: MUX1: SW Sittingbourne**

#### Matter 3.1

I do not accept that this allocation is justified by robust evidence of landscape character assessment due to the following:

Much of the evidence referred to in the modification is rather dated, especially as it is based on work carried out for the lower development figure of 540 dpa.

Even with this caveat, insufficient weight has been given to the HBA Landscape and Visual Impact Assessment (SBC/PS/118) which clearly describes most of the site as of Medium-High and Medium value. The overall magnitude of effect on the landscape is also assessed as High Adverse and the Visual Sensitivities are assessed as being from Medium to High Sensitivity.

#### Matter 3.2

The very high level of uncertainty about the likelihood and timing of improvements to the A249 junctions at Key St. and Stockbury (M2, J5), together with the fact that the proposed site has multiple ownership, casts great doubt on the deliverability of the new Modification within the period of the Plan.

#### Matter 3.3

Robust infrastructure planning should surely imply proper consideration of the impact on the public water supply. Southern Water, who have principal responsibility for water supplies locally and regionally have expressed concerns about the omission from the proposals of proper consideration of the public water supply and groundwater contamination. The whole of the site area is designated as a Zone 1 Source Protection Zone and should, therefore require serious consideration before being compromised by concreting over for housing, or any other, development. This assumes even greater importance, given the frequency of water shortages in the region during recent years. There is no evidence that the Council have given this proper and robust consideration.

#### Matter 3.4

The points already covered demonstrate that it is extremely doubtful that the MUX1 allocation can be delivered in the plan period. The late or non-delivery of essential documentation for this Inquiry adds to the doubt that the Council is capable of meeting timescales for major projects (witness the massive delays to the, still not underway, Sittingbourne Town Centre Regeneration Project)

### Matter 3.5

References to flood-risk assessments in the revised Plan rely on published works referring to coastal and river flooding to dismiss any consideration of this issue. However, there was never any real risk from these causes; the real, and frequent, problem arises from groundwater run-off during periods of heavy rainfall – a not infrequent occurrence in the Wises Lane area, with the junction of Wises Lane/A2 regularly underwater on its south side. This has also been a problem for residents of Grove Park Ave., though some mitigation for this has been carried out recently.

The ability of the land forming the proposed site to absorb rainwater will be severely compromised by the level of development proposed and can only result in serious flood risk for the area at the lower end of Wises Lane, not to mention the ability of the aquifers to replenish properly.

There appears to be no significant consideration of these points either in the Revised Plan or the Council's responses to representations. Could this be because they are inconvenient facts?