

# CPRE Kent

Brian Lloyd; Jillian Barr

## Swale Borough Local Plan - Matter 8: Sustainable Transport and Infrastructure

### Matter 8

ID429231

Representation  
Numbers:

LP227, LP264, LP266,  
LP301

### 8.1 Sustainable transport

#### (i) Does the Plan as a whole give appropriate weight to seeking a modal shift to encourage use of public transport, walking and cycling?

1. In its representations (**LP227, LP264, LP266**) CPRE sets out its disappointment that the plan does not seek to ensure a meaningful modal shift in transport. The Swale Transport Strategy was published in December 2014. A 9<sup>th</sup> March 2015 Report to the Swale Transportation Board introduced the strategy as providing potential highway and transport solutions to facilitate a proposed growth of 9,200 homes (540 houses per year) and 400,000m<sup>2</sup> of employment land (approximately 9,000 jobs) identified in the Local Plan up to 2031. It is not clear why these figures are different to those contained in the local plan, what implications this has for the consideration of impacts and whether this has yet been subject to consultation.

2. The 9 March 2015 report to the Swale Transportation Board concludes the following: “The draft transportation strategy for Swale reflects the fact that travelling by private car and by commercial vehicles will be the predominant choice for the majority of trips. Improvements to the highway network will be required to ensure that congestion does not threaten the viability of the industry in the district, but it may not be possible to fund all of this from developer contributions. There is scope within the district to improve the uptake more of sustainable forms of transport”.

3. This reference to improving the uptake of sustainable transport is recognised within the draft Transport Strategy (2014) and it proposes mode shift targets, stating the following:

“Specific modal share targets will be set as part of the planning process taking into account the mix, scale, location and availability of public transport and cycling/walking routes for new developments”.

4. At paragraph 5.5 the draft Transport Strategy states:

“All new development will be required to provide for sustainable transport by:

- Ensuring that all housing and employment developments are served by bus routes, with fully accessible stops within 400m of any part of the site;
- Ensuring there is space for secure cycle provision;
- Ensuring that local amenities are within walking distance;
- Prioritising walking and cycling routes, making them direct and secure through design.”

5. This is followed by a list of cycling, walking and bus actions at Table 11. The Swale Cycling Strategy (2013?) also contains recommendations. Unfortunately infrastructure improvements to encourage a modal shift towards public transport, cycling and walking are not featured prominently in the Infrastructure and Delivery Schedule (2014). It is assumed that projects will not be prioritised formally until a CIL schedule is produced, but the evidence to date seem to suggest junction and road improvements are priority actions.

6. It is CPRE's view that it is unlikely that the sustainable transport projects and the scale of investment proposed will result in significant modal shifts. Further, the proposed projects and their links to local plan delivery are not clear. It is important that development proposals remedy or mitigate the impacts of trips generated from development proposals. This is key to ensure the plan satisfies the requirements of para 29 of the NPPF, which states:

'Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.'

7. The road building and improvements proposed in the plan, and beyond the period of the Plan, are clearly the priorities for infrastructure investment. The Plan fails to demonstrate a balancing in favour of sustainable transport modes as required by the NPPF. In fact, use of the private car is likely to increase. This will result in continued increases in emissions that contribute to climate change and reduced air quality.

8. In terms of sites sustainability it noted that a number of the site policies include sustainable transport requirement, including cycle links. CPRE (Kent), however is concerned that a number of the sites are not located where sustainable transport patterns can easily be achieved, nor are the policies framed to ensure opportunities for walking, cycling and public transport are maximised.

## 8.2 Highway Infrastructure (CP2, AS1)

### (i) Is the plan supported by a robust local transport strategy and highway infrastructure planning

9. See response at 8.1 above and comment **LP264**.

10. CPRE believe that it is unlikely that the draft Swale Transport Strategy (2014) will result in significant modal shift in transport. Swale Borough faces a major challenge to cope with a large number of homes and jobs, and to ensure that congestion does not continue to be harmful to business success, health and the environment.

11. Such a strategy needs to be prepared to respond to uncertain central Government funding and innovative ways should be sought to resolve transport problems and resource projects. Although the strategy shows evidence of partnership working to deliver enhancements to road capacity on strategic roads suffering from congestion, this is not balanced by sustainable transport projects of sufficient significance. The Implementation and Delivery Schedule (2014) does not seem to prioritise sustainable transport either.

12. The Local Plan and Swale Transport Strategy need to make sure they properly fulfil the key role they need to play in delivering a shift to non-car modes of development. As stated in paragraph 5.2.3, strategic transport modelling indicates only a small shift from car - based transport to bus or rail and this should be a focus.

## 8.2 Highway Infrastructure (CP2, AS1)

**(ii) Does AS1 provide a clear and effective strategy for delivering the Sittingbourne Norther Relief Road?**

**(iii) Is the area of search referred to in Policy AS1 justified by robust evidence?**

13. See CPRE comment **LP301**, which sets out its detailed objection to the SNRR.

14. The reasons are summarised below.

1. The highway authority has advised that the northern route would be difficult to achieve for reasons of expense. There is a railway crossing and difficult ground conditions.
2. The potential route of the road would have a detrimental impact on land designated as Area of High Landscape Value. This land should be deleted from Safeguarded Area of Search.
3. Land to the north of Bapchild has been proposed as Local Green Space, which according the NPPF should 'be capable of enduring beyond the end of the plan period'. It would be perverse and contrary to the NPPF to consider the land proposed as Local Green Space in the search for a route for the SNRR. The Safeguarded Area of Search should not incorporate the Local Green Space.
4. The only remaining route for the SNRR, therefore, is a direct route southwards on the western side of Tonge/Bapchild. This, however, would conflict with land identified as open space on the housing allocation. This open space is essential to ensure the separation of Tonge and Bapchild from the edge of Sittingbourne. A road through this open space will reduce its accessibility to the new community, and reduce its value. A major road through the open space would profoundly and fatally undermine the purpose of providing the open space in the first place. It would negate the ability of this of open space designation to act as a gap.

15. In light of these facts it would be not be possible to find an acceptable or viable alignment for the road within the proposed area of search. It would be unfortunate to 'blight' the area for many years to come by an undefined proposal which would be unlikely to proceed in any case. It does not provide the certainty demanded of a local plan by local communities.

16. If there is a prospect of the road passing southwards between Sittingbourne and Bapchild it would preferably be located close to the existing urban edge. The selection of this route should not be limited by the proposed allocation of Stones Farm for housing. Therefore if the Council wish to pursue the SNRR and identify a Safeguarded Area of Search, then the Stones Farm site should be deleted from the local plan and an area of search identified which is limited to land immediately south of East Hall Farm. Any potential for housing development could then be considered as part of a local plan review.

17. Irrespective of the above points CPRE believes the evidence base does not justify this proposal and objects to the plan on this basis. The evidence shows that the road as currently completed provides sufficient relief to the town centre, to enable regeneration opportunities in the town centre to be achieved. The highways authority has already confirmed that the completion of the road is not needed to support the delivery of the development proposed in the plan. It would have significant impact on the A2 to the east of Sittingbourne, increasing traffic and the associated environmental impacts.

18. CPRE (Kent) are concerned about the Safeguarded Area of Search. Conflicts between the allocations (open space element) and designations (Local Green Space, Conservation Area, AHLV) on the same piece of land as the Safeguarding Area of Search are difficult to resolve. It does not appear that Policy AS1 and the associated safeguarding boundary shown on the Proposals Map have been subject to the Sustainability Appraisal testing and this makes the assessment more difficult. Although appraisal is more challenging on a non-specific route, the impacts together with reasonable options should be considered at this stage. The Sustainability Appraisal of Policy A8 (Stones Farm) fails to recognise the risk to the open space mitigation included in the policy. The SA should really seek to identify the risks of the SNRR on the achievement of the Sustainability Objectives .