

Craig Solly

Matter Statement Matter 13 – Transport (Policies SP41-SP47 and TP01-TP10)

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Issue 1 – Safe and Sustainable Transport – Policies SP41-SP44

Q1. Is Policy SP43 intended to apply to all proposals for new development, regardless of scale or location? Is the policy effective and consistent with national planning policy?

Response: It is not clear what funding is required in the whole plan and how that factors in the inner circuit road along with other transport requirements. With 2 large sites (Birchington and Westgate) providing most of the funding for the inner circuit this opens risk to be higher and the contributions from windfall and smaller sites is unclear. It is also unclear if funding from external sources will be secured which may occur in the plan period. This does not appear to be controlled by policy and by evidence provided so far. It appears that there is a lack of evidence on viability, risks assessment on the scheme and and no contingency planning if the plan does not produce the housing as planned (Thanet Housing delivery figures and test is known to be poor). The risk could create more issues for the highway network if not implemented correctly and in step.

The document CD8.13 Amey Technical Note – Strategic Site Allocations Impact 2018, which was released after publication (and so was not clear to local communities to comment at publication stage), appears to concentrate on the strategic sites, however no mention of how windfall development and non strategic sites will contribute to transport and if it is vital to support viability and deliverability.

On CD9.9 Inner Circuit Delivery Strategy note it states:

“At this early stage it is anticipated that no single allocation site is reliant on the delivery of the entire strategy in order to progress, as such strategic sites will continue to contribute towards the ongoing housing supply throughout the lifetime of the proposed Local Plan”

It is unclear what this would mean if the Birchington or Westgate site is not phased correctly or delivered in time. Both sites are key to the transport plan and will be barriers to other areas of development especially in Westwood and Hartsdown where the inner circuit provides mitigation to the level of housing in those areas.

Q2. What is the justification for not including reference to electric vehicle charging points in Policy SP43? Is the policy consistent with paragraph 35 of the Framework in this regard?

Response: Agree on the point in that there is opportunity to provide access to electric charging points in the main town centres and Westwood where this appears not have been planned. The Sainsburys (Westwood) supermarket however does provide this facility.

SP12 does state: *“Provide one electric car charging point for every 10 parking spaces provided in communal areas, or one charging point to be provided for every new dwelling with parking provision within its curtilage”* which covers new development.

Q3. What is the rationale for Policy SP44? Is it clear what is expected of decision-makers, developers and local communities?

It is not clear on what the aim is, is this to improve road links or railway infrastructure or both? In terms of railway upgrades I don't see any evidence from Network Rail who manages the railway infrastructure and what would improve the line speed which is the key to improving train times and possible costs which would be considerable.

Has capacity of the rolling stock been considered for which the Department of Transport would authorise via the Train operating company (TOC)? Ramsgate station and Depot holds the rolling stock for high speed services in this area (current fleet size is 29 units), has this been factored if more rolling stock is required?

Southeastern also changed the availability of high speed services in 2018 as routes can go via the North Kent and Chatham Mainline and services are easily changed from mainline services to high speed at other stations in Kent as well as using the javelin services.

The bigger picture is also to understand the demand of rail travel across Kent with other local authorities which I presume have factored the increase of demand on rail services towards London including Eurostar services and rail freight.

It is unclear if other forms of sustainable travel will be sought at the parkway station, for instance will there be a dedicated bus system which provides good links to parkway station where and where can be accessed?, will the loop service be expanded?

Issue 2 – New Railway Station – Policy SP45

Q1. What is the justification for Policy SP45?

Thanet Parkway Station is a project produced by KCC to improve the access to high speed services on the railway network. Ramsgate station does not have the capacity to serve for more parking.

Services from Minster station should be safeguarded as there is concern from local residents that this station will close because of the new station. If the station is closed, the sustainability for Minster and Monkton is reduced.

Q2. Is it clear to decision-makers, developers and local communities where the new station will be located?

It is unclear why the site has been selected to where it is now. There is an opportunity to locate the station to be incorporated with the Manston green development which would improve the sustainability for that site, and is also in the urban area. It is also in line to Manston airport landing strip which again would be more favorable in location as a station more than housing.

The site is close to the the St Augustine's Cross which is a listed monument which should be considered in the policy.

“This 19th century cross of Saxon design marks what is traditionally thought to have been the site of St Augustine's landing on the shores of England in AD 597. Accompanied by 30 followers, Augustine is said to have held a mass here before moving on.” English Heritage.

Cliffsend is in the rural area and there has been large objections from the village as many representations have been made. The parish council have lodged objections.

The current proposal for highways for the station is not ideal its not known why the station is not accessed via the sevenscore roundabout. Pedestrians are limited by the A254 on the north side of that road and would have to walk over the road underpass via Clive road, which is not optimum.

Q3. Is the provision of a new railway station on land to the west of Ramsgate deliverable within the plan period?

Funding for this project has been made recently at a cost of 27.1 Million pounds, the project was initially set to cost 11.2 Million pounds. It is possible that this project could increase further in costs which could affect its delivery.

Recent news:

<https://theisleofthanetnews.com/2019/04/15/thanet-parkway-station-project-awarded-14million-government-funding-with-cost-projected-to-reach-27-7-million/>

Issue 3 – Strategic Road Network - Policies SP46-SP47

Q1. What is the rationale for Policy SP46? Is it clear what is expected of decision-makers, developers and local communities?

Response: It is commented from Highways England that:

“We are content that the indicated traffic at Brenley Corner junction with the M2, and the junctions of the A256 with the A2 near Dover (Duke of York roundabout) as outlined in the report will not have a significant impact during the AM peak hour. However the trip generation in the PM peak hour has not been provided; accordingly we require evidence of why a PM peak hour assessment is not required or confirmation of the impacts in the PM peak hour.”

From my view the SRN has issues when there is a traffic incident and possibly at other times which may not be in the peak times stated. It is noticeable that traffic slows from around 4pm in the pm flows, and queuing on the M2 occurs. Why was such a small window of a hour selected as criteria for the study for the morning and afternoon flows?

Q2. What is the status of the Thanet Transport Strategy?

Response: The Transport strategy is highly influenced on the outcome of the airport and as such affected the transport plans progression. The 2017 consultation and the publication showed the road proposals. It is questionable if this was positively planned over the plan process. In transport terms this is possibly not the best strategy if the airport was not returned to aviation use. This has to be commented in that the plan period is up to 2031 and the DCO application which is due has an effect on Highway planning.

This is commented under SP18 in my representation and was discussed under Matter 5 where the Manston court - Haine link runs through the north field of the airport, it is uncertain at this stage what the status is. It is possible that the haine link will feed at manston road (margate spur) has the road been assessed and modelled?

It also could mean that the Manston road (Margate spur) could also be used increasingly especially (as another option for traffic) when the road runs parallel to the Shottendane road as link road to enter and exit thanet via spitfire junction. Has assessment of the Manston road been undertaken to understand if this requires mitigation due to development? Manston road with all roads provided in the plan would provide a clear route to and from Margate from outside the area. This should be understood more and evidence needs to be provided for capacity and the effect of traffic behaviour.

Q3. What is the justification for safeguarding the routes set out in Policy SP47? Are these routes necessary for the implementation of the growth identified in the plan? If so, what evidence has been prepared to demonstrate that the routes are deliverable within the plan period? Who will

be responsible for delivering the necessary highways infrastructure, especially where third-party land is required?

Response: In my view this is possibly a 20-30 year plan objective (including funding required) crammed into 12 years of the local plan period to 2031. Despite agreements already being made by developers and council it applies to only some of the sites in the local plan. It has to be commented that Thanet is one of the worst performers in the country for housing delivery. What is the change required to improve deliverability for Thanet?

External funding would provide more certainty on the delivery of roads and it would be viewed more positively if the road infrastructure was delivered first or as a matter of priority to the communities who are affected. The local plan is now in its 8th year and funding for roads has not been found so far. I am concerned also on the level of contribution to various road projects from the Birchington and Westgate sites. Other projects, assets and mitigation on those sites and will need to be funded and would the highways contributions risk viability?

I am not convinced of the stepped approach will deliver the housing in the plan period, I am not aware of any large growth of population (as seen in ONS estimates) or a change in the way in where people want to live. I have stated before, migration from London has always been in Thanet's history and isn't a new concept to understand. Thanet is also at the longest distance from London in Kent (and is expensive). There are other areas in Kent where undoubtedly grow due to geographic location in the future. There are 2 Garden cities due to be planned in Kent in the plan period, what effect this will have on the housing market? As well as other economic jumps and bumps.

I am not sure on why the Columbus avenue extension is essential in the plan is it to improve highway capacity? Is there a reason? Is the link from Brooksend hill to Manston road required or could it add more traffic to the A28?

Q4. How have the costs associated with the highway's improvements been considered as part of the Plan's preparation?

Response: The document CD8.13 Amey Technical Note – Strategic Site Allocations Impact 2018, which was released after publication (and so was not clear to local communities to comment at publication stage), appears to concentrate on the strategic sites, however no mention of how windfall development and non strategic sites will contribute to transport and if it is vital to support viability and deliverability. What contribution formula will be used?

It is also unclear on what level of funding could come from Local Growth Funds and National Roads Funding, how likely this is and when?

Q5. Are the safeguarded transport routes shown accurately on the submission policies maps?

Response: It appears the road routes from and including coffin corner to Victoria traffic lights are not clearly marked on the proposals map. Which roads are safeguarded?

Q6. How will Regulation 123 of the CIL Regulations apply where five or more separate planning applications provide funding towards the projects referred to in Policies SP46-SP47? Will the new strategic road proposals be effective in mitigating the in-combination effects of additional transport movements and pressure arising from new development in Thanet?

Response: It has been hard to understand how much more traffic will be operating in 2031, it is known that the Haine corridor is at capacity and that in turn it affects traffic from the town centres, such as Broadstairs. The study has only been made where the new development is, but its not clear if the traffic issues to Broadstairs will be improved with these road plans. From looking at the traffic flows Birchington Square will still have its challenges for traffic and other more local measures may need to be done, it is unclear on what that would be at the moment. Air quality may improve in Birchington if the roundabout is removed which stops idling traffic. Improvement to buses to run hybrid may also improve the air quality, adoption of electric cars also. Coffin corner will still have traffic lights and air pollution may increase on Manston road and around where the traffic from Westwood joins. As stated already there are no mitigation work for the town centres, which also will attract more tourist traffic in the summer months.

Issue 5 – Walking, Cycling and Public Transport – Policies TP02-TP04

Q1. What is the justification for having separate policies relating to cycling, walking and public transport? Are they consistent with the Framework’s Core Planning Principles which seek to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling?

Response:My representation for policy TP04 seems to be in a different place on the publication website to the policy. Please see a copy of my representation below:

Comment ID	1261
Respondent	C Solly [List all comments by this respondent]
Response Date	04 Oct 2018
Response Type	OBJECT
What is the nature of this representation?	Object
Comment	<p>Point 1: No further expansion of Bus services, and The loop service to have the same level of service all over the urban area. Currently the major routes are on a hourly basis and in Birchington there is a disadvantage in getting to different areas of Thanet as opposed to the successful loop service which offers a bus every 7 to 10minutes. In some areas of North Thanet the walk to bus services are not as close as other town centres in the district. If 3600 houses are planned in Birchington and Westgate, appropriate upgrade of Bus services must be made to improve sustainability. It can be seen that bus routes for Margate, Broadstairs, Westwood and Ramsgate are well defined this is not the same in Birchington and Westgate.</p> <p>Point 2: KCC is cutting subsidies to bus services that affect the Thanet area. With an increase of population to be 27000 in the plan period, significant investment needs to be made to enhance the sustainability of Bus travel. As reported by a local councillor, Bus routes 56, 42, and the 39 are under consideration under the big conversation consultation (results of that consultation due Sept 2018).</p> <p>Point 3: A Park and ride scheme appears not be considered. There are areas in Thanet which are very restricted for Parking, a appropriate Park and Ride scheme would improve sustainable transport options in these areas.</p>

Do you consider the document is Sound? No

If no, Do you consider it is unsound because it is: Not Positively Prepared, Not Effective

What changes do you suggest to make the document legally compliant or sound?

SP14 and SP15 may not meet or deliver this policy due to the distance from the primary frontages and Town Centres. These developments are on the edge of the urban area. Thanet loop services are not offered in these areas, which would improve and promote sustainable travel.

Cuts to KCC subsidies could worsen the sustainability of public transport in the area and special provisions for buses should be enhanced if the population is due to grow by 27000 people. Park and ride should be considered.



Thames Network Map 150418 MM

A Broadstairs councillor want to hold a Big Conversation meeting of her own - as people in her ward cannot get the bus to the County Council meeting

Jennifer Matterface, the Thanet District Councillor representing the Beacon Road Ward, plans to hold a meeting of her own to discuss proposed bus service changes in her ward.



Details about the meeting are yet to be confirmed, but Cllr Matterface wants to hold the meeting either in Broadstairs, or during the afternoon, instead of the 7-9pm meeting in Birchington planned by the county council.

She explained why people from her ward would struggle to attend the county council's meeting:

"There are no buses that go to Birchington from Broadstairs or Ramsgate in the evening.

"The routes that interest me are the 56, the 42 and the 39. The 56 is a lifeline, so if it's cut or changed it will make things very difficult.

"A lot of people don't realise how important buses are for people who don't drive. People need to be able to go shopping, to church, the doctor's, things that make life worth living. If they cannot get on the bus they become dependent on other people.

"The route might look empty but people use the route in bits and pieces.

"Hopefully this gives people an opportunity to engage with the county council."

*Update as of June 7: Following discussions by Cllr Matterface and Cllr Barry Lewis with the county council, the Broadstairs meeting has now been relocated to Margate Football Club, Hartsdown Park, Margate, CT9 5QZ, **on June 21***