



# THANET DISTRICT LOCAL PLAN EXAMINATION

## MATTER 13 - TRANSPORT (22<sup>ND</sup> MAY 2019)

### HEARING STATEMENT ON BEHALF OF MILLWOOD HOMES

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#### General

This Hearing Statement has been prepared by WSP, who act for Millwood Homes in respect of the Policy SP15 Strategic Housing Site at Westgate-on-Sea.

It aims to add clarification, where considered necessary, to the Transport Policy points raised in the Inspectors MIQs.

The statement has been prepared in the light of and taking account of the Highways Infrastructure Statement of Common Ground (CD9.4) and the Inner Circuit Note (CD9.9).

#### Matter 13 Transport

##### ISSUE 3 - STRATEGIC ROAD NETWORK

**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?**

The necessity for these highway improvement works is contained in the transport evidence base, particularly in CD6.5, where the impacts of all the strategic housing sites without the improvements are set out.

On behalf of Millwood Homes, it is confirmed that the safeguarding of the Strategic Routes involving land within the Policy SP15 site and also within their control (as a result of the relationship with Quex Estates explained in respect of Matter 5)As the land required for improvements to Shottendane Road and the Shottendane Road to Dent-de-Lion Road link lie within Millwood control, these links can be considered as deliverable within the plan period.

As is evident from CD9.4 and CD9.9 there are options as to who delivers the works. The works can either be secured through a S278 agreement and undertaken by the developer, which Millwood Homes would be prepared to do, or through a planning obligation where the works are funded by the developer and undertaken by KCC. The way forward on this needs to be discussed further with KCC but there are no in-principle barriers to either option.

Where third party land is involved on improvements relevant to the Policy SP15 site, in respect of the "Extension of Columbus Avenue to Manston Road, Birchington" listed in Table 2 of CD9.9, discussions with KCC indicate that KCC is already advancing this matter with the land-owners. KCC Estates are understood to have a significant interest in the land and so would be an important enabler of the Columbus Avenue extension. The other landowners are understood to have no in-principle objections to releasing the land without CPO being necessary. KCC have also stated in CD9.4 that they are pursuing many different funding options which would potentially reduce the financial commitment of the developers in constructing this and one other major off-site scheme.

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

The information contained in CD6.11 "Technical Note - Strategic Site Allocations Impact" sets out the basic approach to the consideration of the costs of highway improvements. This is amplified in CD9.4 and CD 9.9. Whilst there is no in-principle objection to the method proposed to be used by TDC and KCC in securing the highway improvements

required, the precise costs and apportionment have yet to be fully defined and agreed with the developers. However, in general terms SP15 remains viable based on reasonable assumptions.

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

The safeguarded routes are generally indicative on the submission policies maps where shown. In the case of the Policy SP15 site, the route through the site from Shottendane Road to Dent de Lion Road will be subject to minor change at the next level of detail so as to allow the proposed masterplan to be achieved. There is considered sufficient flexibility in the wording of SP15 to allow for slight amendments as necessary at the detailed stage.

**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?**

It is not intended that more than five strategic sites will contribute towards the strategies highway improvements such as the Inner Circuit, the current methodology set out in CD6.11 restricting the number to two sites.

The work set out in the Transport Evidence base, particularly CD6.5, shows that the highway improvements are likely to be effective in mitigating the in-combination effects. In relation to the A28 corridor of most relevance to the SP15 site, the following junctions are shown as being likely to be significantly over-capacity without the improvements proposed:-

- A28 Canterbury Road/St Mildreds Road/Minster Road
- A28 Marine Terrace/A254 Marine gardens/Marine drive (Clocktower)

Although not assessed in the work reported in CD 6.5, the following two junctions are also likely to be significantly over capacity without the improvements proposed:-

- A28 Canterbury Road/Park Lane
- A28 Canterbury Road/Station Approach (Birchington Square).

The findings outlined above support the conclusion that the highway works will be effective once implemented.