
HEARING STATEMENT
MATTER 13 – TRANSPORT

22 MAY 2019

THANET DISTRICT LOCAL PLAN EXAMINATION

Prepared on Behalf of
Ptarmigan Land
[Representor Id – 493]

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1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of Ptarmigan Land in respect of Matter 13 relating to Transport, specifically matters relating to the Strategic Road Network.

2.0 RESPONSE TO MATTER 13

Matter 13 Issue 3 – Strategic Road Network – Policies SP46 – SP47

On3.1 What is the rationale for Policy SP46? Is it clear what is expected of decision-makers, developers and local communities?

- 2.1 As acknowledged in para 6.21 of the Local Plan (CD 1.1) the Council and Kent County Council (KCC) have, as part of the Plan preparation, carried out high-level assessment of potential Local Plan impacts on the strategic road network, in line with methodology agreed with Highways England. These works conclude potential impacts are very limited and not significant.
- 2.2 Policy SP46 builds upon this, requiring the Council to work in conjunction with neighbouring authorities to produce a joint assessment of planning development reviewing potential impacts on key junctions within these authorities.
- 2.3 This joint working will ensure that any future impacts can be identified and, if appropriate, mitigated by KCC and the necessary authorities.

On3.2 What is the status of the Thanet Transport Strategy?

- 2.4 The Thanet District Transport Strategy (CD 6.1) has been jointly developed by KCC and the Council and replaces the former Thanet Transport Plan (2005). The Thanet District Transport Strategy sets out the significant highways infrastructure required in the District to facilitate the housing and economic growth identified within the Plan.
- 2.5 The Transport Strategy is identified as 'Draft Version 2'. The Council intends to adopt the Transport Strategy alongside its Local Plan.
- 2.6 The draft Transport Strategy was subject to consultation alongside the Regulation 19 Local Plan consultation in August – October 2018, following which it was submitted as part of the Evidence Base for the Local Plan.
- 2.7 No modifications to the Transport Strategy have been identified between the Regulation 19 consultation and Examination. Should any modifications be identified to be necessary these should be included as part of any Main Modifications consultation required.

On3.3 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?

- 2.8 The Strategic Routes safeguarded under Policy SP47 form part of the Inner Circuit Route Improvement Strategy as set out in the Inner Circuit Route Improvement Strategy – Delivery Clarification Note (CD 9.9). As acknowledge in the note:

“delivery of the Inner Circuit seeks to provide a cohesive package of highway-based mitigation to support traffic growth pertaining to the draft Thanet Local Plan”.

- 2.9 As confirmed in paragraph 2 of the note, no single allocation site is reliant on the delivery of the entire strategy in order to progress. As such, Strategic Sites will contribute towards the housing land supply throughout the lifetime of the Plan alongside, but not wholly dependent on, the delivery of the Strategic Routes.
- 2.10 A Statement of Common Ground on Highways Infrastructure (SoCG, CD 9.4) has been agreed between Strategic Site promoters, including Ptarmigan Land, and KCC. As detailed in the SoCG, KCC has developed a transport model for the Thanet area using the SATURN transport modelling package, the development of the model is as described in the Local Plan Validation Report (CD 6.4). The Strategic Site promoters have reviewed the model and agreed, through the SoCG, the model is fit for purpose in terms of modelling the effects of traffic assignments around the District’s highway network.
- 2.11 Specifically regarding the Birchington Strategic Allocation, the proposed safeguarded route through the site (bullet 1 in the SP47 list) will enable a new link road from Minnis Bay to the A28 Canterbury Road and then to Park Lane. This will assist in relieving existing capacity issues which currently occur at The Square, Birchington as acknowledged in the Delivery Clarification Note (CD 9.9).
- 2.12 The link road through the Birchington Strategic Site is required to provide access to and deliver the overall housing requirements, regardless of the wider Inner Circuit proposals. The safeguarded route will therefore be delivered within the Plan period to facilitate delivery of the proposals.
- 2.13 The safeguarded route is not reliant on any third party land, being deliverable within land controlled by the Promoters (Ptarmigan Land and Millwood Designer Homes).

2.14 Delivery of wider highway works will be through developers on-site, and off site either through KCC or developers via Section 278 agreements. As detailed in the SoCG (CD 9.4), where elements of the Thanet Transport Strategy depend on land in control of third parties, KCC and the Council will work with those landowners to secure a negotiated release of land or, failing that, obtain it through compulsory purchase. Should compulsory purchase be required, Strategic Site promoters agree to enter into discussions with KCC and the Council regarding the approach to be taken towards the funding of the CPO process.

Qn3.4 How have the costs associated with the highway's improvements been considered as part of the Plan's preparation?

2.15 The SoCG (CD 9.4) identifies the proposals set out by the Council and KCC for the apportionment of costs of the delivery of the Thanet Transport Strategy, albeit it is acknowledged that costs are preliminary and high level in the absence of more detailed information being available.

2.16 Strategic Site Promoters have been consulted by the Council and KCC regarding the methodology proposed and potential out-turn costs. Whilst it is agreed the use of the Thanet SATURN model should be used to apportion costs, the exact methodology proposed is not agreed and needs refinement. The following comments are provided:

- Elements of the Thanet Transport Strategy which would form access and link roads for specific Strategic Sites have been excluded from the costs. Where it can be demonstrated there is a significant cost differential between the standard of road required as a highway link as opposed to an estate road, this differential should be included in the final apportionment calculations; and
- Whilst Promoters of Strategic Sites acknowledge the need to ensure delivery of highway elements should be held up by a requirement for funding from multiple sites, the unit costs for the Strategic Sites vary considerably using the current KCC methodology of a maximum of 2no. Strategic Sites contributing towards any one scheme. Further consultation is required on this aspect of the methodology, including potential for Strategic Sites to deliver all (or part) of the required interventions through an appropriate form of highways agreement.

2.17 Nevertheless, as set out in the SoCG, it is agreed that the cost apportionment methodology provides a sound basis for the attribution of highway infrastructure costs among the Strategic Sites.

Qn3.5 Are the safeguarded transport routes shown accurately on the submission policies maps?

- 2.18 Where Safeguarded Routes are on/along the existing highway network these are shown accurately on the proposed submission policies map.
- 2.19 Those Safeguarded Routes which form roads through/part of Strategic Sites, these are shown in an indicative manner with the final alignments subject to detailed design. This will appropriately take into account local constraints and topography.

Qn3.6 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?

- 2.20 The Council and KCC's current approach attributes costs of the Inner Circuit Route Improvement Strategy highways works to a maximum of 2no. Strategic Sites. As set out in the SoCG (CD 9.4) this approach is not agreed with the Strategic Site Promoters.
- 2.21 As detailed above, whilst the Promoters of the Strategic Sites acknowledge the need to ensure the delivery of highways elements is not held up by a requirement for funding from multiple sites, the unit costs for Strategic Sites vary considerably using the current methodology of a maximum of 2no. sites contributing to any one scheme.
- 2.22 Further consultation is required on this aspect of the methodology, including potential for Strategic Sites to deliver all (or part) of the required interventions through an appropriate form of highways agreement.
- 2.23 Nevertheless, it is acknowledged the apportionment of costs for specific portions of infrastructure to a number of Strategic Sites (whether this be 2no. sites or revised number less than 5no. sites) ensures contributions comply with the pooling limitations contained within Regulation 123 of the CIL Regulations.
- 2.24 The modelling work undertaken to date, which is set out in the SoCG has been agreed as fit for purpose in terms of modelling the effects on traffic assignments around the Thanet highway network, the proposed measures which form the Inner Circuit will mitigate the likely cumulative impact of the proposed new development within the District.
- 2.25 It is accepted there is likely to be need for further localised mitigation measures, however these are not strategic matters and will be addressed on a site specific basis.

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