

<b>Job No.:</b>	21342	<b>Date:</b>	23 <sup>rd</sup> October 2019
<b>Project:</b>	Proposed Housing Allocations, Cliffsend, Ramsgate	<b>Note Number:</b>	Technical Note 1
<b>Subject:</b>	Response to Thanet District Council Addendum Sustainability Appraisal	<b>Prepared by:</b>	Aled Roderick

### **Introduction**

1. This Technical Note has been prepared on behalf of E. Spanton Farms Ltd and deals with the transport issues associated with four potential housing allocations under its ownership located at Cliffs End, Ramsgate, Kent. These sites are:
  - (i) Site A, land to the south of Cottington Road
  - (ii) Site B, land to the north of Cottington Road
  - (iii) Site C, land to the south of Canterbury Road West (A253)
  - (iv) Residual land located adjacent to the Thanet Parkway Station site.
2. In combination the above sites have the potential to deliver 600 – 800 dwellings depending on the housing densities with the majority being accommodated within Sites A to C. In addition, land owned by E. Spanton Farms Ltd is in the process of being acquired by Kent County Council for the purpose of developing the proposed Thanet Parkway Station, with a small residual section being potentially available for the development of 30-40 dwellings and / or the provision of local facilities. A location plan for these sites can be seen at **Appendix 1** of the Technical Note along with a plan illustrating the sites in relation to the Thanet Parkway Station site, including the residual land.

3. PTP has previously submitted in 2018 a full Transport Appraisal for these sites which concluded that they would be a sustainable location for residential development in transport terms due to their close proximity to the proposed Thanet Parkway Station. This Technical Note should therefore be read in conjunction with the Transport Appraisal.
4. In October 2019 Arup, acting for Thanet District Council, issued an Addendum Sustainability Appraisal for allocations proposed within the Draft Local Plan which included the above sites at Cliffsend. Paragraph 1.2 of the document addresses the general locational requirements for new housing and states that:

*“That any housing distribution should avoid any additional traffic loading of the Haine Road corridor (as advised by Kent County Council Highways), and should be well related to the road network improvements proposed in the draft Transport Strategy, including the Inner Circuit;”*
5. Paragraph 1.2 also makes reference to a constraints map, Figure 1, which illustrates that Cliffsend and the area within which the E. Spanton land holdings are located, falls within the location deemed unacceptable for new housing due to the traffic impact on the Haine Road corridor. This figure is illustrated at **Appendix 2** of the Technical Note.
6. The Sustainability Appraisal considers the proposed allocations at Cliffsend as a whole, i.e. sites A – C and the residual land at Section 2.6. Within the appraisal summary at paragraph 2.60.4 it is concluded that:

*“There is a significant positive effect in terms of the sites’ overall contribution to sustainable housing supply in Thanet,”*

7. Within the section 'Other Planning Considerations' at paragraph 2.60.5 the document states that:

*"To allocate these sites would have significant traffic impacts to the Haine Road corridor."*

8. Section 2.61 deals specifically with the proposed allocation Site A south of the A253 and under the heading 'Other Planning Considerations' at paragraph 2.61.5 it states that:

*"Further development would cause an overload of traffic on the Haine Road corridor and restrict the operation of Parkway Station."*

9. The above issue is also highlighted with respect to the Cliffsend allocations B and C.
10. This Technical Note has been prepared in response to assertion that housing allocations within the Cliffsend area should be prohibited due to the potential impact on the Haine Road corridor and operation of the Parkway Station. It concludes that the Addendum Sustainability Appraisal is flawed in reaching this conclusion for the following reasons.
- (i) Paragraph 2.60.4 of the Sustainability Appraisal draws the overall conclusion that the Cliffsend allocations as a whole would bring positive effects in relation to the supply of sustainable housing. In this context sustainability would include sustainable transport / travel and therefore this positive overall appraisal of the allocations should outweigh the concerns raised in respect to the Haine Road corridor.

- (ii) Significant new housing, 129 dwellings in total, has recently been granted permission in Cliffsend linked to the provision of the Thanet Parkway Station. During the planning process for these sites the highway authority, Kent County Council, raised no objections or concerns relating to potential impact on the Haine Road Corridor or the Parkway Station. At the time of these permissions the District Council considered that the Parkway Station was fundamental to the development of new housing in Cliffsend and would enable it to be sustainable in transport terms.
  - (iii) The Thanet District Transport Strategy 2018, prepared jointly by Thanet District Council and Kent County Council, makes reference to the Haine Road / Westwood Road corridor experiencing traffic congestion issues. The strategy does not however advise any prohibition of new housing within Cliffsend due to the impact on Haine Road but recommends that mitigation may be required to address the highways impacts of new housing.
  - (iv) A number of the strategic allocations being promoted within the Draft Local Plan will result in significant new traffic loading onto Haine Road including sites which fall within the prohibited area shown at Figure 1.
  - (v) The proposed allocations at Cliffsend due to their location in relation to the local / wider highway network and close proximity to the Parkway Station will have a lesser impact on the Haine Road corridor than a number of the strategic allocations being promoted within the Local Plan.
11. Where required the Technical Note makes reference to and draws data from the PTP Transport Appraisal and Thanet District Transport Strategy.

**Haine Road / Westwood Cross Corridor**

12. The A256 Haine Road is the main road corridor for traffic entering and leaving Thanet from the south and the popularity of Westwood Cross as a shopping destination leads to significant traffic volumes in this area during weekday peak periods and at weekends. Westwood Cross is the main retail and leisure destination in the district and due to its popularity the Transport Strategy predicts that highways in the Westwood Cross area, including Haine Road, will experience traffic growth arising from the adjacent Westwood allocation (1450 dwellings) and the other strategic allocations within the district. To tackle traffic congestion issues Kent County Council is in the process of implementing the Westwood Relief Strategy, which over time is intended to deliver a single carriageway ring road around the fringes of Westwood Town Centre.
13. The highway authority within the Transport Strategy has therefore previously accepted that traffic congestion issues associated with the Haine Road corridor and new development can be mitigated via highway improvements and the Strategy makes no reference to the prohibition of new housing development in the Cliffsend area. The scale of the allocations proposed at Cliffsend, 600 – 800 dwellings should be more than sufficient to fund contributions to off-site works that would alleviate traffic congestion over the wider network, including Haine Road.

**Strategic Allocations, Implications for Haine Road**

14. Table 5.1 below taken from the PTP Transport Appraisal lists the strategic housing sites promoted within the Local Plan along with the housing numbers anticipated over the plan period to 2031.

**Table 5.1: Local Plan Strategic Allocations**

Site	Housing Allocation (Dwellings)
Westwood	1450
Birchington on Sea	1600
Westgate on Sea	2000
Land at Manton Court / Haine Road	1200
Manston Green	700
Hartsdown / Shottendane	550
Total	7500

15. An extract from the Transport Strategy illustrating the location for the strategic sites can be seen at **Appendix 3**. A number of these sites will have significant implications for the Haine Road corridor in relation to the impact of development traffic. These are discussed as follows.

### **Westwood**

16. This large allocation (1450 dwellings) will generate significant vehicle movements in and around the Westwood Cross commercial centre, including Haine Road in order to access shopping and leisure facilities. In addition vehicles from this location will load onto Haine Road in order to access the proposed Parkway Station in Cliffsend and the A299 which carries traffic between Thanet and the M2 motorway. A significant proportion of residents commute out of the district using the A299 and M2 hence the council's proposal for the Parkway Station.

### **Land at Manton Court / Haine Road**

17. This is another large allocation (1200 dwellings) that will load traffic onto Haine Road to access the same routes and facilities as outlined for the Westwood allocation. It should also be noted that part of this allocation falls within the area highlighted at on the constraints map at Figure 1 where the Sustainability

Appraisal recommends that residential development should be prohibited due to the impact on Haine Road.

### **Manston Green**

18. The allocations at this site are located immediately adjacent to Haine Road to the south of the Westwood Cross centre. Traffic from the 750 proposed dwellings at this location will therefore be required to use Haine Road to access shopping and leisure facilities at Westwood Cross, the Parkway Station and the A299 and M2 routes out of Thanet to the west. This allocation, in particular would therefore result in significant additional traffic loading onto Haine Road. The full extent of this site is located within the prohibited area for new housing development shown on the constraints map.
19. Overall it is considered that the three allocations highlighted above would result in significant traffic loading onto Haine Road with a resulting impact that would require mitigation according to the Thanet Transport Strategy. It is therefore unreasonable for the council to object to the proposed allocations at Cliffsend by reason of the potential impact on Haine Road when this impact has been deemed acceptable for larger strategic allocations. In addition, the potential transport impact of the Cliffsend allocations were not modelled within the Thanet Transport Strategy and therefore the impact of these sites on Haine Road any mitigation that may be required has yet to be determined in detail.

### **Cliffsend Allocations, Implications for Haine Road**

20. It is acknowledged that the Cliffsend allocations will load traffic onto the Haine Road corridor associated with residents accessing the Westwood Cross centre and the Thanet urban area. However within the Thanet Transport Strategy it is accepted that housing allocations will impact on Haine Road with mitigation via highway works being put forward as the most appropriate solution to this issue rather than prohibiting development in specific locations. The scale of the

Cliffsend allocations, 600 – 800 dwellings should be sufficient to fund a contribution towards appropriate off site mitigation.

21. Due to their location, the proposed Cliffsend allocations and associated traffic will have a lesser impact on the most congested points on the Thanet Highway network, including Haine Road when compared with the strategic allocations for the following reasons.

- (i) Destinations to the west of Thanet, such as the M2 motorway which leads to the rest of Kent and London and A28 serving Canterbury will be a significant draw for residents, especially for employment related trips. Cliffsend residents will be able to access these routes avoiding the most congested highways within the Thanet urban area which are located to the northeast of Cliffsend, including Haine Road. Employment trips will make up a significant proportion of the overall traffic generated by the proposed Cliffsend allocations.
- (ii) To the east of Cliffsend, the A256 corridor leading to Westwood and A299 / A256 leading to Margate will be a draw for residents. However accessing these locations will not require traffic to use the most congested routes such as the A28 corridor in the vicinity of the Margate, Westgate and Birchington strategic allocations. In relation to Westwood and Haine Road Kent County Council has put in place The Westwood Relief Strategy to address traffic congestion issues over the Local Plan period.
- (iii) In relation to the Parkway Station it is clear that none of the strategic sites being promoted within the Local Plan benefits from a close proximity to one of the district's existing rail stations. One of the key benefits of developing housing in Cliffsend will be proximity to the new Thanet



Parkway Station with the proposed allocations being located within a short walking / cycling distance (under 800m) from the station.

- (iv) The Transport Strategy highlights that one of the key factors presenting a barrier to rail travel within Thanet is a lack of affordable and accessible parking at existing stations. This has led to commuters travelling out of the district to access rail facilities increasing the length of car journeys. Development of the Parkway Station has been identified as a solution to this issue, with significant commuter parking being introduced as part of the proposals. The new station will however still result in a significant number of car journeys being generated from the strategic allocations on the Thanet network. Allocating housing sites that are located within walking distance of the station, such as the proposed Cliffsend allocations will be a far more sustainable alternative in transport terms as the number of car journeys associated with a commuter journey out of the district will be significantly reduced. In this regard additional housing at Cliffsend will be better placed to comply with the NPPF and Local Plan policy objectives of reducing the number of car journeys required to sustain new developments.
- (v) In relation to the operation of the Parkway Station the Sustainability Appraisal suggests that the Cliffsend allocations would be detrimental due to traffic from these sites loading onto Haine Road. This conclusion is flawed in that residents accessing the station would be able to do so by non-car modes especially access on foot, thereby reducing impact on the highway network, including Haine Road. This option is not available for residents of the strategic allocations.

## Conclusions

22. In summary it is considered unreasonable for the council to object to or prohibit additional housing development within Cliffsend on the grounds of the potential impact on Haine Road and the Parkway Station for the following reasons:

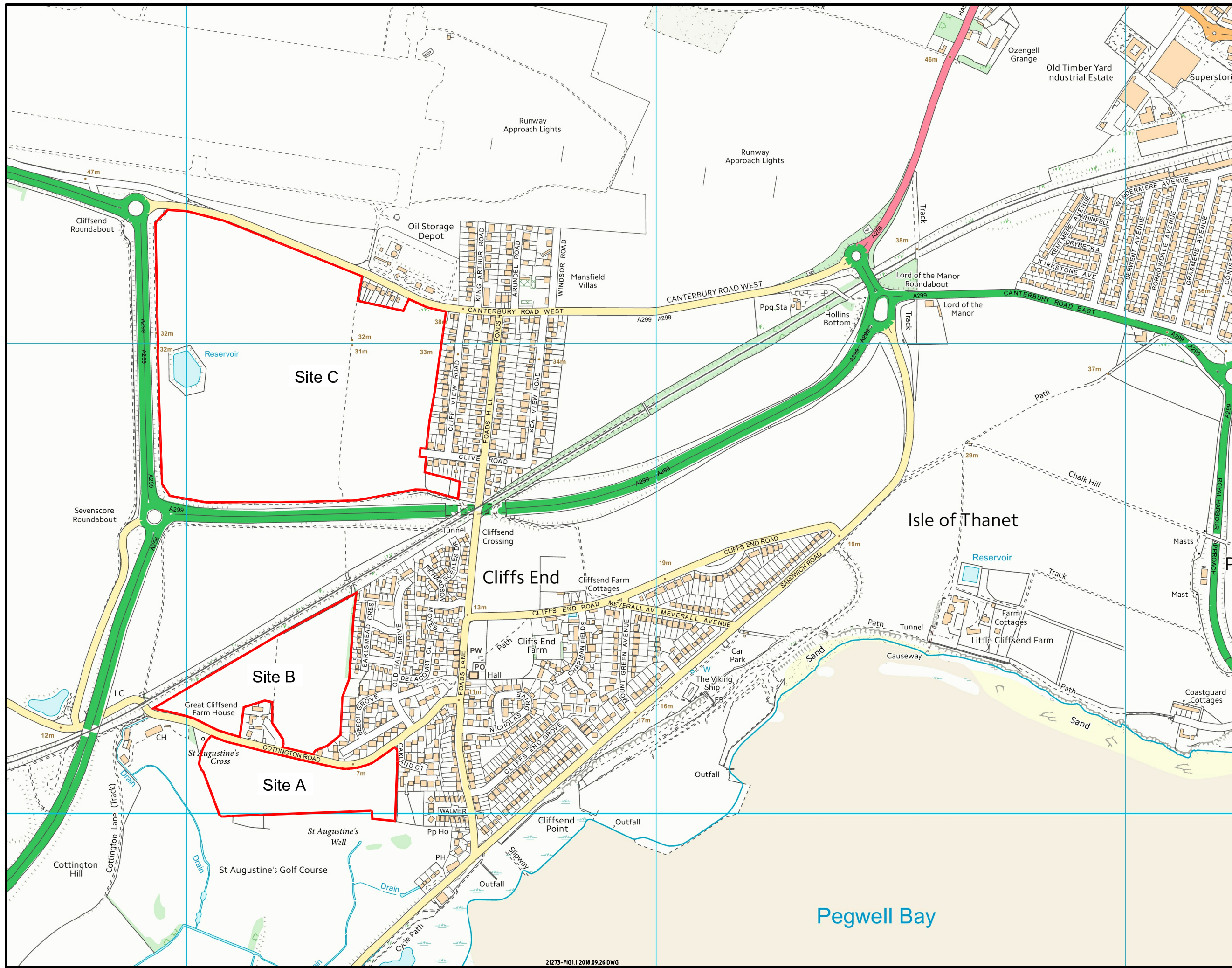
- (i) Paragraph 2.60.4 of the Sustainability Appraisal draws the overall conclusion that the Cliffsend allocations as a whole would bring positive effects in relation to the supply of sustainable housing. In this context sustainability would include sustainable transport / travel and therefore this positive overall appraisal of the allocations should outweigh the concerns raised in respect to the Haine Road corridor. For the strategic allocations within the Local Plan both Thanet District Council and Kent County Council have taken the view that the impact of development traffic on key highway links, including Haine Road, can be mitigated by off-site highways improvement schemes. This approach should also apply to the Cliffsend allocations.
- (ii) Significant new housing, 129 dwellings in total, has recently been granted permission in Cliffsend linked to the provision of the Thanet Parkway Station. During the planning process for these sites the highway authority, Kent County Council, raised no objections or concerns relating to potential impact on the Haine Road Corridor or the Parkway Station. At the time of these permissions the District Council considered that the Parkway Station was fundamental to the development of new housing in Cliffsend and would enable it to be sustainable in transport terms.
- (iii) The Thanet District Transport Strategy 2018, prepared jointly by Thanet District Council and Kent County Council, makes reference to the Haine Road / Westwood Road corridor experiencing traffic congestion issues. The strategy does not however advise any prohibition of new housing

within Cliffsend due to the impact on Haine Road but recommends that mitigation may be required to address the highways impacts of new housing. In addition the strategy did not undertake any traffic assessments or modelling in relation to the impact of the Cliffsend allocations over the wider highway network, including Haine Road. The stated concerns relating to the potential impact on Haine Road are therefore not supported by empirical evidence.

- (iv) A number of the strategic allocations being promoted within the Local Plan will result in significant new traffic loading onto Haine Road including sites which fall within the prohibited area shown at Figure 1. The Sustainability Appraisal is therefore contradictory in this regard and if applied in a consistent manner should not recommend a prohibition of new housing development in the Cliffsend area.
- (v) The proposed allocations at Cliffsend due to their location in relation to the local / wider highway network and close proximity to the Parkway Station will have a lesser impact on the Haine Road corridor than a number of the strategic allocations being promoted within the Draft Local Plan. In this regard the Cliffsend allocations should be considered to be more sustainable in transport terms than a number of the strategic sites.

**APPENDIX 1**





Issue	Description	Date
Status	<b>PRELIMINARY</b> <b>NOT TO BE USED FOR CONSTRUCTION</b>	
Scales	1:7500	Current Issue Signatures
Original Size	A3	Author LJS
Height Datum	O.S.	Checker A.RODERICK
Grid	O.S.	Approver A.RODERICK
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Project  
**PROPOSED RESIDENTIAL ALLOCATIONS CLIFFS END RAMSGATE**

Title  
**LOCATION PLAN**

Drawing No.	Project No.	Rev
<b>Fig 1.1</b>	<b>21273</b>	<b>01</b>

21273-FIG1.1 2018.09.26.DWG

Plot Date: 26/Sep/2018 9:06:10 PM File Location: C:\CONSULTANTS\PTPLANNERS 14\21273-CLIFFS END, RAMSGATE\DWGS\2018\21273-FIG1.1 2018.09.26.DWG

Plot Date: 26/Sep/2018 9:06:10 PM File Location: C:\CONSULTANTS\PTPLANNERS 14\21273-CLIFFS END, RAMSGATE\DWGS\2018\21273-FIG1.1 2018.09.26.DWG







**APPENDIX 2**

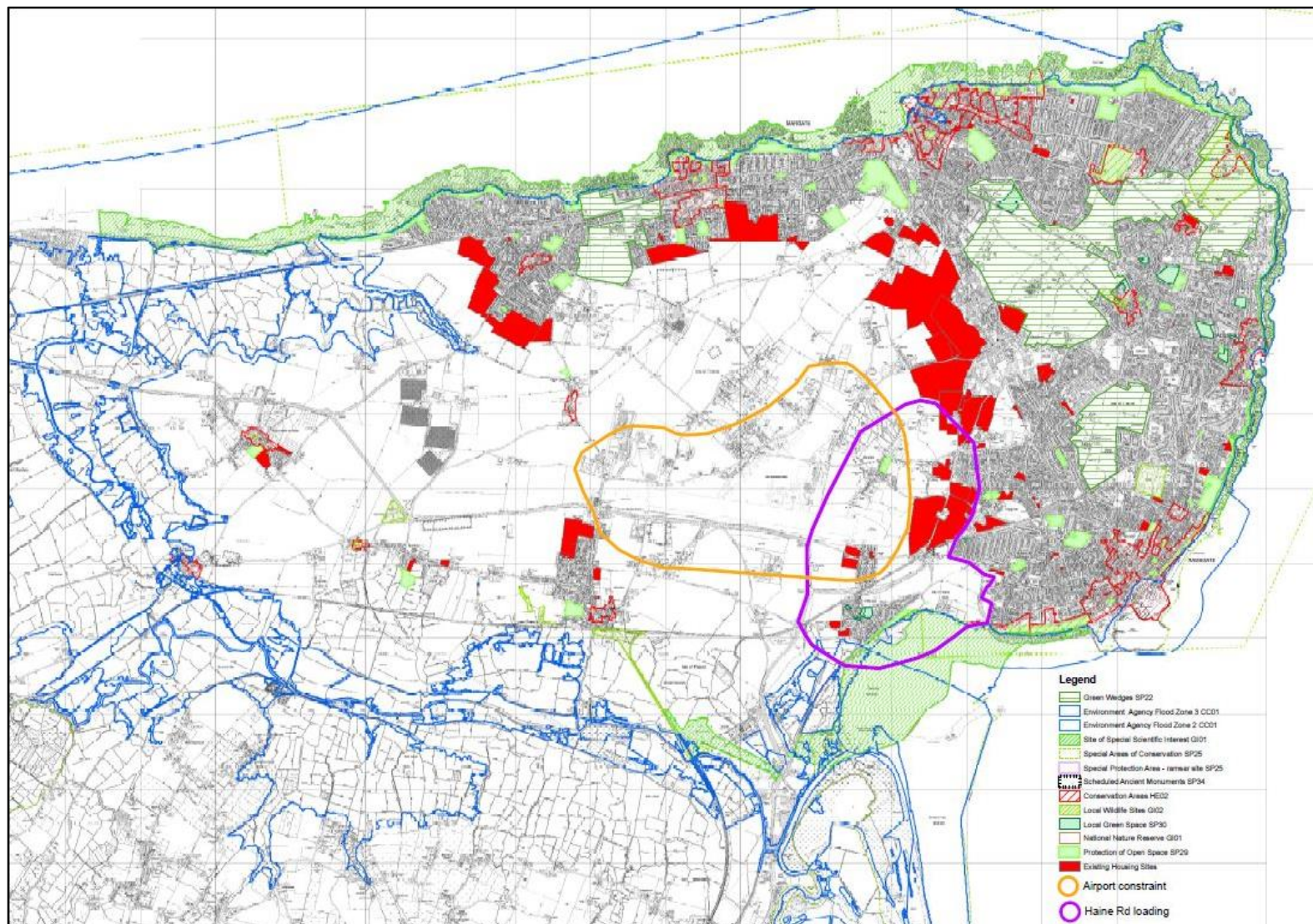


Figure 1: Indicative constraints map



**APPENDIX 3**

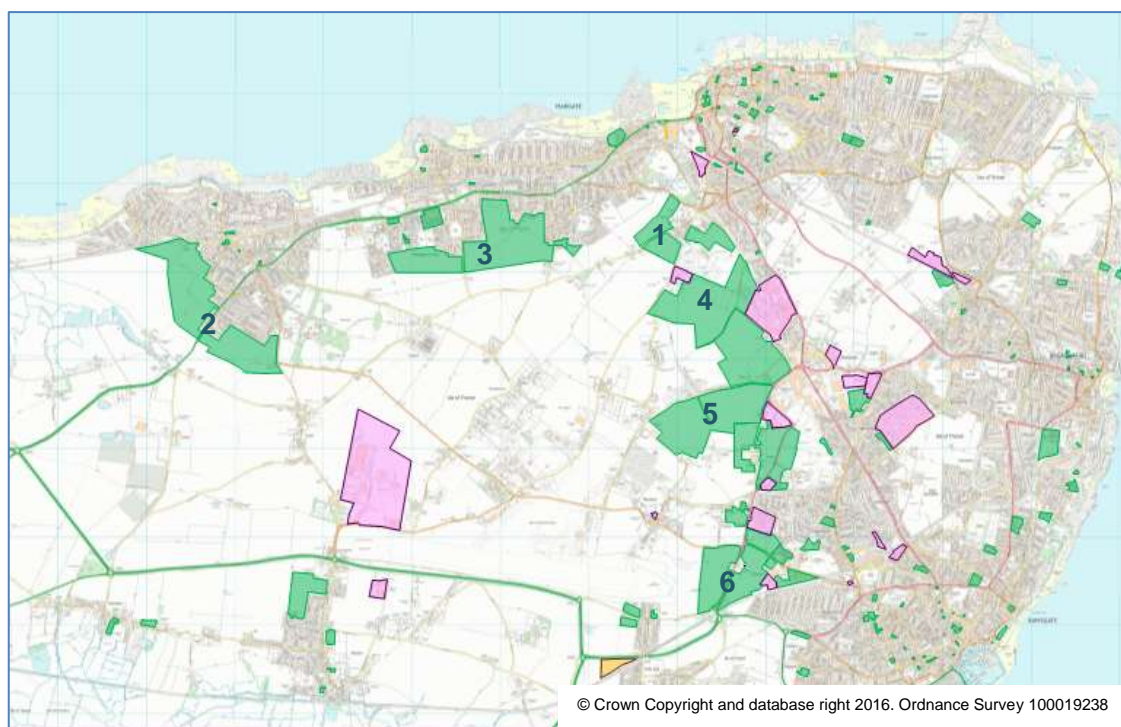


Figure 18 - Key Strategic Development Sites

#### (1) Margate

8.2.3 This site is located to the south of Margate. It comprises of two land parcels to the north and south of Shottendane Road. The site provides the opportunity to provide new highway links between Hartsdown Road and Manston Road, which allows traffic to travel to and from Westwood and the Waste and Recycling Centre without negotiating Coffin House Corner or the existing Shottendane Road/Manston Road junctions.

#### (2) Birchington on Sea

8.2.4 An open site located to the south and west of Birchington settlement to both sides of the A28 Road corridor. This site provides an opportunity to improve highway access to Minnis Bay and Quex Park, providing a level of managed growth in relation to the A28 Birchington Square.

#### (3) Westgate on Sea

8.2.5 A residential development located to the south of existing settlements in Westgate and Garlinge on both sides of Minster Road. The site provides an opportunity for sustainable development and can deliver contributions towards wider improvements within Shottendane Road. A new highway link between Shottendane Road and the A28 could also be delivered (subject to land).