

Matter 11 – other policies

Issue

Whether Policies CSD3, CSD4, CSD5 and SS5 are justified, effective and consistent with national policy.

Policy CSD3

Question 3: Are any main modifications to Policy CSD3 necessary for soundness?

CPRE Kent suggests CSD3 (f) should read “building conversions that contribute to the character of their location” to avoid ambiguity.

Policy CSD5

Question 4: Does the policy provide an adequate and sufficiently clear approach to sustainable drainage and flood risk which is consistent with national policy?

The flood of the winter of 2013-4 inundated large areas of Romney Marsh. This was an extreme event, exacerbated by failure of critical infrastructure¹, CPRE Kent convened a series of meetings during those floods and hosted a conference early the following year, attended by senior staff from all the relevant agencies².

Although deemed to be a rare event it highlighted an issue which occurs relatively frequently. Even if winter flooding is not extensive, groundwater levels often rise to levels which render the conventional foul drainage systems useless. Drains back up, even into residents' houses.

We could find no reference to this problem in the CSR or in the evidence base. The approach to foul drainage for new developments in the rural villages appears to be to require local package treatment rather than to improve the main drainage for the benefit of both new and existing residents.

As sea levels rise, this problem will surely get worse. We would expect to see a strategy agreed between the Council and the relevant drainage authorities to address it.

1 <https://democracy.kent.gov.uk/mgAi.aspx?ID=27740>

2 <https://cprekent.org.uk/news/cpre-kent-flooding-conference-attracts-100-delegates-widespread-interest/>

Policy SS5

Question 7: What are the key elements of infrastructure required across the District (not specifically covered in earlier Matters)?

There is no policy provision for overnight lorry parking as required by paragraph 107 of the NPPF.

Proper overnight lorry parking infrastructure needs to be put in place in order that inappropriate parking does not take place on the highway network, in the interests of highway safety and residential amenity (engine/refrigerator noise, littering) – and, also in the interests of driver welfare.

Paragraph 5.81 of the Plan refers to the “need to address traffic problems identified in the Transport Strategy” (AECOM 2017) – this strategy isn’t listed under the transport heading of the evidence base library. It’s not known therefore whether overnight lorry parking falls within one of the traffic issues to be addressed.

Highways England has previously investigated provision of a large lorry park in Kent at Aldington (2008) and more recently (2015-16) at Stanford West near junction 11 of the M20. These would provide some additional overnight parking but were also intended to replace ‘Operation Stack’ in which lorry queues are allowed to form on the M20 if there is congestion at the ports. Both proposals were abandoned, the latter being withdrawn in November 2017, having been found to be both environmentally and operationally unacceptable. The search continued for an alternative to Operation Stack until February 2020 when it was announced a movable barrier on the M20 would be used instead. Government still identifies a shortage of lorry parks nationwide but is now relying on private enterprise to come up with proposals. It is essential any private developers are made aware of the Council’s requirements for location, access, scale and environmental constraints should any such proposals come forward.

While the Plan promotes employment and recognises the locational benefits of proximity to Europe, it fails to acknowledge the very large amount of HGV traffic that uses the M20 - either within the District to access the Eurotunnel at Cheriton, or to the Port of Dover.

The need for lorry parking infrastructure arises because of the locational advantages of the District. To acknowledge those locational benefits but to deny the requirement to provide for the required infrastructure will result in residents and businesses in the District being disadvantaged. And, bearing in mind the proximity of Otterpool to the M20 corridor lack of infrastructure planning in this regard will result in the Otterpool charter delivery being compromised by an unresolved problem of lorry parking.

If the Council is to entertain expansion of existing lorry parks or proposals for new ones, it is essential the relevant policies are published for consultation on such a contentious issue.

Question 9: Does Policy SS5 set out a clear and effective approach to infrastructure planning which is justified and consistent with national policy, including where the transfer of land is necessary?

Policy SS5 states that potential infrastructure requirements are identified in the Council's Infrastructure Delivery Plan.

As set out in Matter7 (questions 21, 22 and 23) it is CPRE Kent's view that the IDP is not sufficiently clear in terms of what infrastructure is actually required; when it'll be delivered; who will provide it; how much it will cost; and how it will be funded.

Question 10: Are any main modifications to Policy SS5 necessary for soundness?

Specific reference should be made to provision for the overnight parking of lorries – whether that be as standalone facilities or provided as new warehousing is built – with space provided not only for the delivery and collection of goods – but for overnight parking provision as well.