

## Cliffe and Cliffe Woods Parish Council

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Parish Clerks: Mr Chris Fribbins (Proper Officer)
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MC/22/0254 Outline application with all matters reserved except for (access) for a residential development of up to 250 dwellings and a mixed-use community hub together with associated infrastructure including public open space and community facilities comprising a replacement sports ground and pavilion, with accesses from Church Street, Cooling Road, and Buttway Lane

The Cliffe and Cliffe Woods Parish Council wish to **OBJECT** to the grant of planning permission for this development. (and supported unanimously by the Parish Council at their meeting on 10<sup>th</sup> March 2022).

- 1) Having considered the access application, we have serious concerns about the proposal for relief of congestion on Station Road and Cooling Road, in particular:
  - a) The proposal from the applicant recognises the capacity issues on the primary route to Cliffe (B2000/Station Road) and the suggested intensification of traffic on Cooling Road (the main route between Cliffe and Cooling and narrow in part by residential properties). The suggested solutions provide some parking provisions on land owned by the applicant, but that is not a suitable solution. At this stage the Transport Assessment and Framework Residential Travel Plan has not been provided, but key traffic impacts can be assumed by the proposed development scale.
  - b) The properties in Station and Cooling Road have no pavement to provide a refuge for residents leaving their homes and having to cross the road to their vehicles. At present, the existence of parked cars directly outside their home provides a buffer and opportunity to watch for approaching vehicles and they do not have to cross the road to, or from, their vehicles. Currently, residents in Station Road have little or no effective sightline down the road from Cliffe Woods.
  - c) The removal of parked cars adjacent to their properties removes a significant element of traffic calming with the reduction of traffic to a single carriageway at times, so vehicle speeds will increase.
- 2) The overall provision of the proposed accesses on Cooling Road and Church Street (to support up to 250 homes and a community hub to the west) will intensify local road issues:
  - a) Vehicle speeds and congestion on Church Street from the Higham/Cooling/Station Road junction to the proposed east and west access, has no effective mitigation proposed. The use of the proposed Community Hub will also add to the traffic serving the west junction.
- 3) Buttway access will intensify usage on a narrow 'country lane' with very limited passing opportunities for two-way traffic.

- 4) Traffic generation further away from the proposed site will also generate other issues:
  - a) With the proposed and completed developments along the west side of Town Road (B2000) and impacts on the Wainscott Bypass (A289) junction with the B2000 that only has access to London bound A2 direction and having to pass through Hollywood Lane/Cooling Road/Bill Street (Frindsbury Extra) with no other routes to Hoo and the Medway Tunnel (Chatham/Gillingham etc) and intensifying traffic volumes from Hoo Road onto the congested Four Elms Roundabout.
  - b) On Town Road/B2000 Cliffe Woods, the major addition of new housing to the west will intensify the number of pedestrians crossing the road to access local facilities, (especially the local school and public transport access).
  - c) The master plan shows no addition of significant community infrastructure, so residents will need to travel to Cliffe Woods, Hoo, or the central urban areas of the Medway Towns, Gravesend, or Bluewater for services.
  - d) Land in the ownership of the applicant does suggest further probable growth (the applicant has consulted on plans for five hundred properties previously, but the proposed access is for only 250), so usage of the proposed accesses would intensify further than design limits if the site us further expanded).
- 5) The Parish Council would also like to know the basis for any traffic surveys to ensure they are not influenced by reduced travel during the Covid pandemic as typical traffic volumes return.
- 6) Although the application reserves the majority of issues for further submission and the Parish Council will consider them in due course, we are concerned that any approval of this application (just on access) may suggest approval in principle for the full proposal.
- 7) The planning policy context for this application is:

### a) Medway Local Plan 2003

i) Despite proposals from the landowner to develop this site, it was not included by Medway Council in previous plans.

# b) National Planning Policy

i) The lack of an up-to-date plan has put pressure on Planning Authorities to permit **SUSTAINABLE** development sites where insufficient sites are allocated or build-out rates to achieve housing targets are not being achieved. This site is not sustainable.

#### c) Emerging Local Plan

- i) The site was assessed as part of the Strategic Land Availability Assessment (SLAA) in 2014 and remains rejected in the 2019 review due to high-level agricultural, landscape, and heritage impacts.
- ii) The site is not included in the Draft Local Plan due to be consulted on (Regulation 19), inclusion as a windfall site would be a perverse suggestion bypassing the local plan consultation process.

#### d) Cliffe and Cliffe Woods Neighbourhood Plan

- i) The Neighbourhood Plan was submitted to Medway Council on the 1<sup>st</sup> of September 2021. Due to 'processing delays,' there has been a delay in progressing to Regulation 16 (subject to Medway Council approval, this will take place in March 2022).
- ii) Policies include, but are not limited to:
  - (1) Special landscaping requirements on village boundaries,

- (2) Village development boundaries,
- (3) Detailed, and published, community infrastructure assessment, and mitigation.
- (4) Due to the land elsewhere that already has approval for development from Medway Council, and the local pressures that brings, there is no assessed need for further large sites.
- 8) If this application progresses to further detail, we will want the planning authority, and related community service providers, to ensure full recognition that needs are considered and documented for us and residents to comment on before any related planning application is recommended for a planning decision as this information will be required in the event of an appeal by the applicant, especially:
  - a) Impact on local RAMSAR/SSSI/SPA, Nature (Flora and Fauna) etc.
  - b) Agricultural Land Quality Assessment The site falls within an area always understood to be Grade 1 and although this is only a guide and further work is required to investigate specific detail, we would expect an independent view to be commissioned by Medway Council to assess the developers claim at public exhibitions, that this is not the case.
  - c) Local Schools (to avoid need to drive)
  - d) Doctors (ability to support current and increased demand).
  - e) Support for existing Community Services (very limited shops and village hall capacity).
  - f) Electricity (much of the local village mains supply is still overhead wiring)
  - g) Water supply and, especially sewage, are local issues
  - h) Telecoms (high-speed internet is being rolled out in Cliffe Woods, but not in Cliffe currently)
  - i) Public Transport interventions are time-limited and there is a reliance on private car usage leading to congestion, air quality and road safety issues at times.
  - j) Pedestrian and Cycle routes that avoid using of the dangerous/narrow in part B2000 with additional pressures of commercial traffic to the Salt Land area (large lorries etc.)

Cllr Fred Harper (Chair Cliffe & Cliffe Woods Parish Council – Planning Committee Chris Fribbins (Clerk, Cliffe, and Cliffe Woods Parish Council)