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**Cuxton Parish Council response to the Planning Application for The Homestead, Sundridge Hill, Cuxton 17th January 2020**

The concerns listed below support the decision of Cuxton Parish Council (CPC) to object to the planning application MC/19/3312: Land adjacent to The Homestead, Sundridge Hill, Cuxton.

**This site was assessed as unsuitable for development in Medway Council’s own SLAA report 1068 (Appendix 1, page 6).**

Cuxton Parish Council (CPC) acknowledge the importance of training opportunities for the construction industry. However, to be of any value, any training site must be permanent, offer a comprehensive range of training options and be delivered at a suitable location. CPC believe that this application fails to meet these important criteria.

# Proof of Need

The planning application states that there is a shortage of training facilities in the London area and locally. The proposed site on Sundridge Hill will offer training on 4 small construction vehicles. It is difficult to see how this small and **temporary** site makes any significant contribution to meeting this need.

On investigation there are in fact several large sites in Kent and Medway offering CPCS and NPOR training including large training sites on Medway City Estate, in Tunbridge Wells, Swanscombe and Ashford. These are all well established companies offering a full range of construction plant training and are located in business parks on brown field sites. The application mentions a company in Minster Sheppey. This company primarily offers ‘on site’ training on working construction sites and so the argument that travelling to this company for training could be problematic is flawed. In addition, there is a very large company in Billericay and at other sites in Essex that are easily accessible from London and north Kent/Medway.

It should be noted JB Training Enterprises Limited (Rochester) were approached on the 15th January and were able to offer training on any construction plant training within a week at their venue.

Another consideration is that there appears to be a move towards NPOR onsite training as a more economic approach for large construction companies to reduce the cost of training. Cuxton Parish Council hold the view that there is sufficient provision in Kent to meet the demand for such training without the Homestead **green** field site being used.

The report produced by TAM states that the application is for 5 years only. It would seem logical that if the demand for this training is so high, as suggested by the application, then the need would be for a permanent site. However, CPC would maintain that neither a permanent or temporary site would be acceptable.

**Appendix 1: Medway SLAA 1068**

# The Site

a. Location

This is a greenfield, grade 3 agricultural site. Change of use appears to only apply to 0.46 hectares rather than the whole site (2.43 hectares).

This site was assessed as unsuitable for development in Medway Council’s own SLAA report (1068).

The site is located directly adjacent to the A228 and is clearly visible from

Sundridge Hill, Pilgrims Way and other locations in Cuxton. The A228 is a single carriageway through the village. It is an increasingly busy road, particularly at peak times, resulting in residents having difficulty getting in and out of the village. Recent comments from Medway Council to Cuxton Parish Council state that the A228 is one of the busiest roads in Medway.

CPC believe that any additional traffic (up to 50 attendees/day 7days a week) coming into the area at peak hours to access The Homestead site will only add to the traffic congestion.

A228 traffic congestion related to the adjacent Cuxton Recycling Centre often creates queues back to the M2 slip road during the summer and at weekends. CPC believe it is reasonable to suggest that any increased vehicle activity at The Homestead site is likely to result in similar traffic congestion at peak times 7 days a week and Bank Holidays.

Traffic leaving The Homestead would have difficulty turning right because of the weight of traffic and would further obstruct the traffic flow on the A228.

b. Access and Egress

It is stated that the plant would be changed approximately every 18 months. The off-loading of the machines would have to happen on the busy A228 as the top entrance is not deep enough to accommodate a low loader. Even if the low loader could access the entrance, egress would involve reversing out onto the A228 with all the dangers and disruption this would bring. This application does not adequately address the question of how the plant machinery would be transferred to and from the site without causing serious disruption to traffic on the A228.

CPC would also suggest that the engineering work required to facilitate entry of a low loader to the top of the site would be detrimental to the rural scene. Clearance and enlargement of the entrance to the site to enable easier access would radically alter the street scene and make the training site more clearly visible from the A228 and to residents living in Pilgrims Way and beyond.

CPC are pleased to note that initial proposals to access the site from the bottom of Sundridge Hill **adjacent to a traffic island,** have been abandoned.

# Parking on Site

1. The Transport Plan for this application suggests that only 9 car parking spaces will be available on site. It also states there could be up to 50 people on site at any one time. This is of particular concern for Cuxton as there is no parking available on Sundridge Hill and only rarely in the adjacent Pilgrims Way.
2. The travel plan document suggests that most attendees will come by public transport or will be transported to the site from a pick-up point. Although some attendees will use public transport, CPC do not believe this plan is workable as there is no incentive to trainees to comply with the travel plan.

The walk from Cuxton Station is said to take 7 minutes to the bottom of the site along the busy A228. There is **no pavement** on Sundridge Hill only a grass verge, which makes this route dangerous for pedestrians and cyclists alike. At one point the verge passes in front of a crash barrier installed because of the number of cars crashing off the A228 at this section. This is not a safe route to the site.

Experience suggests Travel Plans rarely reflect reality.

There is no evidence that Medway Council (who the applicant states own the freehold to the lower access to the site) have agreed trainees can use this route to access the site.

# Flood Plain

1. The application indicates that there are no water courses within 20 metres of the site. This is incorrect as the lower part of the site is adjacent to a flood plain and water course. The construction vehicles are working at the bottom of the site adjacent to the flood plain and so there is a risk of contamination

# Utilities

# CPC note that the water main and main sewage pipe are now identified on the site plan. It is unclear if the relevant utility providers have been consulted about any measures needed to protect these services. This is of concern.

# Contamination of Ground and Water Course

1. At the pre-planning application meeting CPC were assured there would be no risk of contamination to the ground or water course. It was suggested that fuel would be purchased from the garage in Cuxton and delivered to the site in fuel cans as they did not want to store fuel on site. This is impractical with the amount of fuel required by the machinery, and therefore CPC feel it is likely that fuel will need to be stored on site and that this possibility would pose a risk to local residents if proper provision is not made. Adequate fuel storage facilities and risk assessments need to be in place to protect site residents, attendees and Cuxton residents from the risk of fire and explosion.
2. There is a plan to prevent contamination of the ground where the vehicles are stored, but no mention of how contamination of the water course will be prevented if a vehicle should break down and need repair on the lower working area of the site that is closest to the water source.

The lack of comprehensive plans to ensure that the ground and water course are protected from avoidable contamination is of great concern to CPC and another reason to object to this application.

# Ecological Survey

a. The Preliminary Ecology Assessment produced by K. B. Ecology Ltd, page 12, section 3.4: Reptiles - it states the following:

*“there is a ‘high likelihood of presence score’ for slow worms and grass snakes”* in the area.

On page 29 there is reference to the Wildlife and Countryside Act 1981, which states:

 “*it is illegal to kill or injure adders, grass snakes, common lizards and slow worms”*.

The report states that the site is also:

“*considered suitable to support hedgehogs which are a species of principle importance under section 41 of the NERC Act. Common mammal species such as rabbit, moles, field vole and fox are likely to be present on site*”.

“*finds no presence or little likelihood of presence of protected species, nor consequential impact on any protected species*”,

page 12, 47 of the Planning Statement written by CB Wright.

CPC suggest ecological considerations are not adequately addressed in this planning application.

CPC are also concerned by references which appear within the independent consultants report, referring to a third party organisation known as Esquire Development Ltd, a housing developer. CPC are also concerned that some of the data report was produced in 2016 and therefore is not up to date.

# Air Quality and Noise Pollution

Given the high volume of traffic travelling through Cuxton any increase in air and noise pollution is unwelcome. Many of those objecting to this planning application are concerned about the noise, dust and air pollution coming from plant being used 6 days a week (no machines working on Sundays). CPC would support their concerns in this regard.

# Loss of Green Corridor

1. CPC have recently engaged with the development of Medway Council’s Local Plan. Much has been said at these events about maintaining ‘green corridors’ across Medway. The Homestead Site lies within an Area of Local Landscape Importance (ALLI) known as *Cuxton Scarp Foot*. It is listed in Medway Council’s Local Character Assessment Report 2011 p98 making it ‘*unsuitable for any type of development’*. ALLI status also provides clear links with the current Medway Green Blue Infrastructure Vision 2019.

Allowing for The Homestead land to become reclassified as industrial land will lead to it being used as a “brownfield” site and suitable for housing development- a green space that will never be replaced. CPC cannot support the loss of part of our village ‘green corridor’.

1. As the world appears to be in the midst of a climate emergency CPC believe it is increasingly important to preserve green spaces, particularly those that are unsuitable for development.

For the above reasons Cuxton Parish Council formally and strongly object to the planning application for the land at The Homestead at Sundridge Hill to be used as a Vehicle Training Site.

Mrs June Nicholson

Clerk and RFO

Cuxton Parish Council

17th January 2020

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| page1image3009024**Site**  |
| **Reference**  | 1068  |
| **Address**  | South of Sundridge Hill, Cuxton  |
| **Description**  | Very steeply sloping down from the main road. Some tree coverage on parts of the site. Sensitive landscape and green corridor. Vehicular access issues, realignment of road may well be necessary (new mini roundabout?). Also new footpath along frontage would be required. Main road is a major barrier, crossing to reach village facilities.  |
| **Size (ha)**  | 3.1  |
| **Relevant policy guidance**  | page1image3008352 |
| **Location Plan**  | page1image1831168 |

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| page1image3761120**Development Potential**  |
| Residential (units)  | 90  |
| Employment (m2)  | Office  | 30,955  |
| Industrial  | 12,380  |
| Storage  | 12,380  |
| Main Town Centre Uses (m2)  |  |
| Other Uses  | page1image5005376 |

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| **Suitability ‐ General**  |
| Facilities & Services Accessibility  | Site has poor access to services and facilities.  |  |
| Public Transport Accessibility  | Site has moderate access to public transport opportunities.  |  |
| Highway Network Capacity  | Access to the strategic highway network (M2/A2), and around the Medway urban distributor network generally, is likely to constrained by a number of identified congestion hotspots. Whilst it is possible that strategic  |  |
|  | infrastructure upgrades may address these congestion issues, improving capacity on the network, there are no upgrades planned or identified at present. Further detailed assessment would need to be undertaken (as part of the Local Plan or development management process) to demonstrate how traffic generated be the development could be accommodated on the network. Developer contributions may be required to fund any infrastructure upgrades necessary to address network capacity constraints.  |  |
| Site Access  | It is likely a suitable vehicular access could be created on to A228, which is directly adjacent to the site. Notwithstanding the above, the suitability of the prospective access would need to be further investigated through the Development Management Process.  |  |
| Ecological Potential  | An ecological survey of the site has not been investigated as part of this high level assessment and as such the presence or absence of protected species and/or habitats cannot be established at this stage. Further assessment would therefore need to be undertaken through the Local Plan or Development Management process, before development could be supported or rejected.  |  |
| Designated Habitats  | Natural England guidance (Impact Risk Zones) indicates that development of this site poses a potential risk to a SSSI. Further assessment of the potential impacts of development upon designated habitats would therefore need to be undertaken through the Local Plan or Development Management process, before development could be supported or rejected.  |  |

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| page3image3781504**Suitability ‐ General**  |
| Landscape  | The site is situated outside of the built up area, with an area of locally valued landscape of the Cuxton Scarp Foot, which is considered sensitive to change. Development is thereby likely to have a detrimental impact upon locally valued local landscapes.  |  |
| Heritage  | Development is unlikely to have an impact upon any designated heritage assets.  |  |
| Air Quality  | Site may be constrained by air pollution but mitigation is likely to be deliverable.  |  |
| Contamination  | Contamination is not suspected on the site.  |  |
| Site Developability  | The site has steep gradients that would make the site difficult to develop.  |  |
| Agricultural Land  | Whilst the site is situated on agricultural land, it is understood to be Grade 3 or less. Notwithstanding the above further assessment of the agricultural land quality would need to be undertaken through the Local Plan or Development Management process, before development could be supported or rejected.  |  |
| Open Space  | Site is not designated open space.  | page3image5021392 |

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| page3image3799600**Suitability – Housing**  |
| Flood Risk  | Level of flood risk on the site is considered acceptable.  |  |
| Noise  | Noise pollution may affect the site, but it is likely that this could be mitigated.  |  |
| Amenity/Overlooking  | The site has the potential to impact upon amenity of nearby residential properties. Whilst this is likely to be resolvable through sensitive design, it is likely this would have implications for site capacity.  |  |
| Employment Land  | Site is not designated employment land.  |  |
| **Overall**  | The site is considered unsuitable for development unless identified constraints can be addressed.  |  |

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| **Suitability – Economic Development**  |
| Flood Risk  | Site is at low risk of flooding.  |  |
| Noise  | Noise pollution may affect the site, but it is  |  |
|  | likely that this could be mitigated for commercial uses.  | page4image3672096 |
| Amenity  | Mixed commercial and residential area.  |  |
| **Overall**  | Site is unsuitable for employment uses.  | page4image2993792 |

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| page4image3676880**Suitability – Mixed Use**  |
| **Overall**  | The site is considered unsuitable for development unless identified constraints can be addressed.  | page4image4984768 |

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| page4image3680208**Availability**  |
| Landowner is actively promoting the site for redevelopment through call for sites ‐ housing  | page4image2994352 |

**Addendum to Cuxton Parish Council Response to Homestead Planning Application**

**TOWN & COUNTRY PLANNING ACT 1990 ENFORCEMENT NUMBER/PLANNING NUMBER: MC/19/3312****APPEALS REF: APP/A2280/W/20/3265031
LOCATION: The Homestead Sundridge Hill Cuxton Rochester**

**In addition to our original response Cuxton Parish Council would also point out the following:**

1. The site is 2.5 hectares in size. The ecological appraisal suggests keeping 1.93 hectares as **retained habitat**, managed in line with a biodiversity plan, i.e. not significantly changed. Yet the change of use classification is being sought for the whole site.
2. Three of the proposed 8-9 new parking spaces are located opposite or just inside the access, significantly narrowing this point and creating a required turning angle of approximately 35 degrees from those approaching from the M2 side. This sharp turn will need to be accomplished within a width of just a few feet, meaning a slow manoeuvre and a significant reduction in speed on the approach, adversely affecting the free flow of traffic. Mr Gill’s offer to ‘slightly adjust the line of the fences’ will not mitigate this.
3. The water course has been subject to significant flooding this winter.
4. The council notice that Diggerland Kent, in Strood, are now running an NPORS accredited mobile plant training centre within a mile of The Homestead. This therefore removes any need for one at The Homestead.

June Nicholson
Clerk
Cuxton Parish Council