

Ashford Core Strategy
Public Examination

Statement on Policy CS15 Transportation
on Behalf of Berkeley Strategic / Jarvis Homes Ltd / Pentland Homes Ltd

June 2007

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1 Introduction

- 1.1.1 This statement is prepared by WSP Development & Transportation Ltd on behalf of Berkeley Strategic, Jarvis Homes Ltd and Pentland Homes Ltd (Respondent No. 88). The three companies (hereinafter referred to as BJP) control the majority of the proposed major urban extension at Chilmington Green, Ashford.
- 1.1.2 BJP strongly support the submitted Core Strategy proposals for Chilmington Green and consider that it represents a sound element of the spatial strategy for the Ashford Growth Area. However, BJP do have some concerns regarding detailed elements of the Core Strategy. The purpose of this statement is to highlight in Sections 2 and 3, the relatively limited areas of concern and to suggest revised wording to Policy CS15 which, in the view of BJP, would enhance the soundness of the plan.
- 1.1.3 Section 4 addresses issues which arise from the Inspectors Agenda for the 'Transportation' session on the 28th June 2007.



2 Policy CS15

- 2.1.1 BJP are committed to the delivery of an efficient and sustainable transport strategy for both the new urban extensions and Ashford as a whole. However, there are three aspects of Policy CS15 which could be modified to make the policy more sound. These are,
- (a) the deletion of references to Smartlink and replacement by references to “a high quality public transport system”
 - (b) the test in paragraph 2 of CS15 that new accesses and the intensified use of accesses will not be permitted where there is an increased risk of accidents is unreasonable
 - (c) reference to car parking standards in a Core Strategy.
- 2.1.2 Smartlink : Other objections submitted by BJP to Policy CS2 explain how it is inadvisable to refer to a particular public transport scheme in the upper case policy. Such a course of action would be inflexible and place the Borough Council in a difficult position if it became necessary to promote an alternative public transport system which did not bear the Smartlink ‘badge’. A more robust and flexible solution would be to delete references to Smartlink and replace them with a commitment to the provision of a high quality public transport network.
- 2.1.3 It is considered that the current wording of Policy CS15 in terms of Smartlink fails both soundness test 9 (flexibility) and soundness test 7 (appropriateness) since unnecessary inflexibility cannot be appropriate in the circumstances of the aims of the Core Strategy.
- 2.1.4 Accident Risk : The second paragraph of Policy CS15 states that new accesses and the intensified use of accesses will not be permitted if there is an increased risk of accidents. Read literally, this would mean that since any new development or access point carries with it the risk of additional accidents, no additional development or access can be permitted. This cannot be the intention of the policy. It is noted that the second test in this paragraph refers to traffic delays and in this case the test is qualified as being ‘significant traffic delays’. In order to make this policy work, the reference to safety risk should refer to a ‘material’ or ‘substantial’ increased risk of accidents.

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- 2.1.5 It is considered that this part of Policy CS15 is inconsistent with soundness tests 4 (consistency with national policy), soundness test 7 (appropriateness) and soundness test 9 (flexibility) since it is an inflexible and inappropriate test which does not reflect national policy.
- 2.1.6 Parking: The final paragraph of Policy CS15 adds nothing to the Core Strategy in that it states that unless new car parking standards are set in DPD's, the national and regional standards in PPG3 and the South East Plan will prevail. Since PPS3 (as the replacement to PPG3) does not refer to car parking standards, this part of the policy is already out of date. Notwithstanding this, the reference to car parking standards is not appropriate to a Core Strategy.
- 2.1.7 It is considered that this part of CS15 is inconsistent with soundness test 4 (consistency with national policy) and soundness test 7 (appropriateness).



3 How Can Policy CS15 Be Made More Sound?

3.1.1 It is the view of BJP that Policy CS15 can be modified so that it meets the tests of soundness. Two modifications to the Policy are proposed

(a) Amending the second sentence of paragraph 2 to read

“New accesses and intensified use of existing accesses onto the primary or secondary road network will not be permitted if a significant increased risk of road traffic accidents or significant traffic delays would be likely to result”


(b) Deleting paragraphs 4 to 6 and their replacement by the following.

“The Council’s transport strategy for the Ashford Growth Area includes high quality bus based public transport and park and ride facilities as identified on the Key Diagram. Where development sites include elements of these proposals or other identified transport infrastructure involving the highway network, parking, cycling and walking facilities, the land required should be reserved and the scheme designed to accommodate this. Proposals which may prejudice such infrastructure being provided will not be permitted”.



4 Issues Raised In The Inspector's Agenda

- 4.1.1 This part of the BJP submission responds to certain of the issues raised by the Inspectors Agenda for this session. In order to keep this submission as short as possible, comments are only made where not already dealt with in Sections 2 or 3 and where relevant to the overall case to be presented by BJP at the public examination.
- 4.1.2 Smartlink: Smartlink is considered to be a realistic proposal but the plan would not be robust if a 'fall back' position did not exist. In the case of Chilmington Green, a fall back position (whether interim or permanent) is a high quality bus based scheme which has the same characteristics as Smartlink. This can be delivered incrementally, building on the existing local bus network as the Chilmington Green urban extension expands. It is envisaged that initially 2 buses per hour can be provided, rapidly increasing to 6 to 8 buses per hour. There is no reason why this should not achieve the same levels of modal shift as Smartlink. As a consequence, a failure to deliver Smartlink would have no adverse implications for the continued identification of Chilmington Green as an urban extension.
- 4.1.3 BJP endorse a high quality bus based public transport system but do not consider that Smartlink is sufficiently developed to become a 'branded' scheme in the Core Strategy. In accordance with the advice in PPS12, it is not necessary for the Core Strategy to go into this level of detail, indeed the plan would be more robust if there is a commitment to the transport concept but flexibility is left concerning its precise form.
- 4.1.4 BJP consider that the viability of the Chilmington arm of Smartlink would not be undermined by any proposed third arm. This is because the Chilmington arm is economically robust and operationally deliverable. It is expected to become financially viable at an early stage in the development since it runs through existing development for much of its length and will gain early patronage. This would not be materially affected if there were two or three arms of Smartlink, as long as Chilmington Green is confirmed with a critical mass of between 6,000 and 7,000 dwellings and the design ensures that most residents are within 400 metres of a bus stop.

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- 4.1.5 An example of a similar system is the Fastway scheme which links Gatwick Airport, Crawley and Horley and is performing strongly. Similarly the North Kent Fastrack scheme is performing better than forecast. It is likely (but not essential) that park and ride services to the Town Centre will be in place before Smartlink starts. Clearly, there would be a benefit if these services were integrated. Examples which are integrated in a similar manner include the Cambridge Guided Bus which will connect to the park and ride in the town centre and the proposed Bath Western Riverside Rapid Transit.
- 4.1.6 There will be a need for other measures to promote the use of sustainable transport. However, this can be articulated as part of the AAP's for the urban extensions.
- 4.1.7 Motorway Junction: BJP consider that the timescales for the implementation of Junction 9 improvements are feasible since they are likely to comprise the signalisation of the junction within highway land. In contrast, Junctions 10 and 10A are more of a risk area since J10 entails highway works which may involve third party land, and Junction 10A is an entirely new junction. Delays to Junctions 10 and 10A would further underline the robustness of the Core Strategy in selecting Chilmington Green as an urban extension capable of early implementation.
- 4.1.8 List of Highway Schemes: These schemes represent a package of measures modelled and justified by the GADF. As such, it is appropriate to refer to them in paragraph 11.11. However, these are not designed or funded at present, so it is not possible (or appropriate) to be prescriptive about phasing and implementation. The only scheme reference which needs to be amended is the reference to Smartlink which, as explained above, should be changed to a commitment to a high quality bus based public transport system.

