

OSPRINGE PARISH COUNCIL

26th July 2013

Graham Thomas
Swale Planning Department
Swale Borough Council
East House
Sittingbourne ME10 3HE

Dear Graham

SW/13/0660– Brogdale Farm – change of use as demonstration gardens with incidental buildings and associated parking

The parish council is strongly opposed to this application.

We note that this is a mildly revised version of the application withdrawn in February of this year. We also note the applicant's comments that much of what is now applied for was granted consent in November 1995 – it is the parish council's view that much has changed in the intervening 18 years and different considerations now apply.

Our main concern relates to traffic and its effects; vehicle parking; impact on amenity; and loss of agricultural land. We are also concerned at a lack of strategic overview of Brogdale Farm as a whole.

The application includes a mildly reworked Transport Statement including a new section on the A2/Brogdale Road junction capacity. The Statement assumes that most traffic approaches Brogdale along the Brogdale Road from the north. As the Statement reports, this is a two-way road but the Statement underplays the pinch points on this stretch of road, and even cars frequently have to stop to allow passing. The situation is clearly more difficult the larger the vehicles involved.

Of great concern to the parish council is that the Statement pays scant regard to traffic coming to and leaving the site other than via Brogdale Road to the north. This is naïve. Numerous other roads to the application site include Brogdale Road to the south and thence via Porters Lane or via Plumford Lane, Eastling Road and, further afield, Coxetts Hill and Faversham Road (the latter linking the A2 and, via Newnham and Doddington, the A20). All of these roads are ill-suited – if not totally unsuited – to an increase in traffic levels. This is particularly true in the case of Porters Lane and Plumford Lane. Motorists using their satnav – as well as motorists seeking the shortest route – coming from the A251 and elsewhere will be directed along either Porters Lane or Plumford Lane and any increase in traffic is unacceptable. It is simply unrealistic to expect signage at the junctions of these two rural lanes and the A251 - or directions online or via ticketing – to deter motorists from using these narrow lanes. There is already a sign on the Porters Lane/A251 junction stating 'Unsuitable for HGVs' yet, despite this, numerous HGVs including large articulated lorries venture down this lane.

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This leads on to the robustness of the numbers in the transport statement. The Statement acknowledges that the visitor numbers are figures provided by the applicant. There is little or no independent verification. They predicate 60,000 annual visitors. There is no certainty whatsoever that this is an accurate figure, and reliable sources state that it is hoped that visitor numbers will total 120,000 or more per year. Even using the figure of 60,000 the traffic movements are unacceptable. A doubling in visitor numbers makes the assumption and the predictions of impact meaningless. The damage is likely to be even greater if these numbers are achieved or even exceeded. The lack of certainty on this point causes great concern.

Even using the assumption of visitor numbers of 60,000 per annum, the parish council has concerns over the projections in the Statement and the robustness of the figures. Four examples:

- a) no account is taken of the traffic generated by the Brogdale Market Place which is often busy,
- b) limited account is taken of traffic movements associated with staff employed on Brogdale Farm as a whole,
- c) the impact of festivals (the recent cherry festival on 20th/21st July 2013 attracted large numbers of visitors and therefore vehicles) is not fully analysed, and
- d) the assumption that all educational visitors arrive in fully occupied 52-seater coaches is unrealistic.

Such examples, and there are others, call the integrity of the statement into question.