

**MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION  
WRITTEN SUBMISSION BY CPRE KENT &  
MAIDSTONE DISTRICT COMMITTEE OF CPRE KENT**

**SESSION 6B - LARGER VILLAGES HOUSING DEVELOPMENT**

**Issue (ii) Whether specified Loose and Larger Village housing allocations are sound or require modification.**

1. Loose

H1(29) New Line Learning, Boughton Lane

**Qn6.25 What capacity improvement is possible at the Wheatsheaf Junction and would that be sufficient to clear the Swan Junction as claimed having regard to traffic from other proposed developments?**

Whilst we welcome proposed change PC/27 that provides for the provision of dedicated pedestrian and cycle route. However, given the hills between the site and the town centre it is uncertain if this would result in reduced vehicular movements into the town centre.

The Wheatsheaf junction lies within the Maidstone AQMA [see Appendix 1]. At 2013 there were three Diffusion tube monitoring points at or near to the junction [see Appendix 2]. The Maidstone Borough Council LAQM Progress Report 2013, Bureau Veritas Air Quality, October 2013 at Table 3 of the Progress report shows that Site 53 at the Wheatsheaf PH had a 'worst case exposure', and Appendix A to the report provides data on NO<sub>2</sub> monthly from January to December. This shows that only during July and December did NO<sub>2</sub> were concentrations under the mean annual average of 40µg/m<sup>2</sup> (as set out on page 26) , for the rest of the year they exceeded 64, on reached 93.7 in November [see Appendix 3].

A recent Planning Opinion of Robert McCracken QC on Air Quality and emissions<sup>1</sup> sets out that:

*'65 ... planning authorities have a duty in their decision making to seek to achieve compliance with the Directive's limit values.*

*66 Where a development would cause a breach in the locality of the development they must refuse permission.*

*67 Where a development would in the locality either make significantly worse an existing breach or significantly delay the achievement of compliance with limit values it must be refused.*

*68 Where limit values are not exceeded in the locality planning authorities must try to prevent developments from worsening air quality and to achieve best air quality ...'*

It seems highly unlikely that the allocation will not have a detrimental effect on Maidstone AQMA, especially when considered in combination with housing allocations and planning permissions in the south east strategic development location, as well as allocations and permissions at Headcorn, Coxheath, Staplehurst, Marden and Boughton Monchelsea which are likely to result in increased traffic at the Wheatsheaf junction.

2. Boughton Monchelsea

**Qn6.27: What capacity improvement is possible at the Wheatsheaf Junction and would that be sufficient to clear the Swan Junction as claimed having regard to traffic from other proposed developments?**

See our response to Q6.25 above.

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<sup>1</sup> Air Quality and emissions. Clean Air in London; Air Quality Directive 2008/50/EC and Planning Opinion of Robert McCracken QC, Frances Taylor Building. E-law January/February 2016

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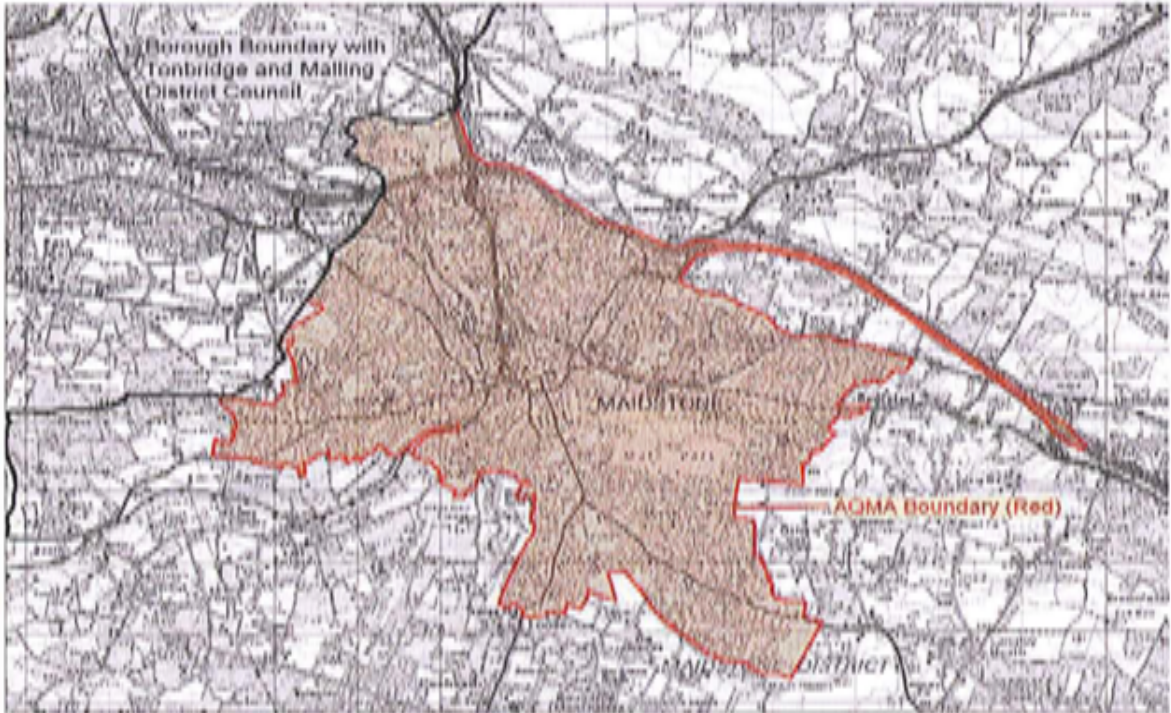
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Appendix 1: Figure 1 Maidstone AQMA

Bureau Veritas Air Quality

Maidstone Borough Council

Figure 1 Maidstone AQMA



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Appendix 2: Figure 4 Location of Diffusion tube monitoring - South Maidstone

Bureau Veritas Air Quality

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Figure 4 Location of Diffusion tube monitoring – South Maidstone



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**Appendix 3: Appendix A: QA:QC Data**

Bureau Veritas Air Quality

Maidstone Borough Council

**Monthly Diffusion Tube Results**

Site Ref	NO <sub>2</sub> Concentrations µg/m <sup>3</sup>											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Maid 03 Tube 1	63.2	59.6	66.8	44.5	51.1	36.5	30.2	34.6	48.8	49.1	61.0	57.4
Maid 03 Tube 2	48.7	48.9	64.6	47.2	41.6	45.1	25.5	39.4	40.6	60.1	54.5	56.2
Maid 03 Tube 3	45.0	60.9	51.7	52.4	38.6	33.7	42.1	38.3	47.4	52.5	59.0	56.2
Maid 06 Tube 1	26.9	44.3	26.8	13.8	12.1	9.2	21.6	18.6	14.3	20.9	22.1	25.0
Maid 06 Tube 2	25.3	26.7	26.6		13.2	9.7	16.5	14.2	14.9	18.5	23.2	25.4
Maid 06 Tube 3	25.7	26.7		13.6	11.1	9.8	33.9	14.0	15.2	18.8	22.2	25.0
Maid 10	43.2	53.5	51.0	36.1		24.7	11.3	23.8	36.2	39.5	37.1	51.0
Maid 11	40.8	39.9	35.2	29.3	28.0	29.0	11.3	37.0	34.8	36.8	40.1	41.3
Maid 12	52.3	42.2	30.0	31.3	26.6	24.9	11.5	30.3	31.9	39.8	42.7	38.9
Maid 14	45.1	40.5	51.5	35.7	38.4	26.3	27.0	24.6	39.2	22.8	35.5	46.0
Maid 15	40.0	37.0	38.6	25.5	24.2	19.9	20.3	20.7	37.8	24.5	28.6	33.9
Maid 18	37.6	34.4	51.2	27.7	32.6	21.1		17.2	29.8	29.6	28.7	32.6
Maid 19	36.4	38.8	44.6	30.5	30.4	21.1	42.3	21.6	29.4	30.8	29.3	34.1
Maid 20	49.4	44.9	51.6	32.4	39.6	26.0	39.0	21.6	29.1	34.4	34.7	49.5
Maid 21	55.0	50.2	53.0	39.1	38.1	26.2	27.4	26.2	37.0	42.6	45.7	
Maid 22	57.9	42.8	47.2	32.5	28.1	27.7	36.0	31.3	36.3	35.3	43.3	47.0
Maid 24	39.0	39.7		27.4	29.1	16.1	21.9	19.1	28.9	29.5	31.8	37.2
Maid 25	46.5		60.9	41.5	43.9	33.5	23.1	37.9	42.8			
Maid 26	49.7	47.4	45.3	38.6		35.3	31.3	35.7	40.0	40.9	38.8	47.9
Maid 27	57.4	55.6	58.5	43.4	48.9	39.5	36.7	37.8	45.9	46.9	53.9	53.9
Maid 29	47.7	51.9		35.7	29.5	21.6	24.0	23.8	32.4	37.7	43.7	50.9
Maid 36	54.3				50.0	35.6	15.8		50.7	52.3	51.5	62.7
Maid 41	54.2	47.9	50.2	46.2	37.9	39.9	17.1	50.3	47.8	46.1	59.4	
Maid 44	64.0	63.7	65.8		56.7		27.2	35.4	46.6	51.3	48.6	61.3
Maid 45	35.1	35.2	30.4	21.8	21.5	15.7	42.6	17.4	22.4	26.7	15.8	34.3
Maid 46			12.6	16.4			52.1	11.4			23.9	25.1

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Site Ref	NO <sub>2</sub> Concentrations µg/m <sup>3</sup>											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Maid 49	57.6	59.8	63.9	48.4	49.4	42.2	42.6	37.1	48.7	50.0	45.6	54.6
Maid 50	36.0	39.8	42.1	25.2	25.8	15.0	24.6	21.0	23.7	27.6	33.2	34.9
Maid 51	65.9		72.4	54.6	52.8	35.1	24.2	38.2	47.8	60.3	55.4	57.9
Maid 52	64.8	54.9	70.5	52.2	46.7	43.2	39.6	45.1	50.4	55.7	63.1	52.3
Maid 53	64.4	75.9	80.5	77.1	68.0	67.2	37.0	67.7	72.9	72.8	93.7	36.2
Maid 55	51.0	53.8	59.8	55.6	39.7	46.3	71.3	64.2	49.1			
Maid 56 Tube 1	37.4	44.4	40.9	31.8	32.0	22.7	36.8	26.3	30.4	31.3	42.3	87.3
Maid 56 Tube 2	36.6	39.6	41.1	30.4	31.0	21.0	42.9	25.3	29.2	32.3	38.0	
Maid 56 Tube 3	39.8	36.1	40.3	30.5	34.6	22.4	37.8	25.8	27.1	30.7	36.3	
Maid 57 Tube 1	58.8	47.9	53.4	43.1	48.8	33.1	21.0	33.8	45.7	47.1	50.4	50.0
Maid 57 Tube 2	45.7	58.1	55.2	45.7	47.2	30.6	32.4	47.0	53.1	49.5	54.2	51.4
Maid 57 Tube 3	58.2	51.6	58.4	42.3	48.4	35.3	36.6	36.6	51.1	43.5	50.4	44.2
Maid 58	113.4	105.0	112.1	118.4	92.1			109.4	101.8	103.4		
Maid 59	87.6	3.8	88.5	101.4	122.0			81.3	75.3	90.3		
Maid 63	44.6	45.8	51.8	42.1	37.3	38.2	29.6		44.7	43.0	59.9	57.1
Maid 65 Tube 1	46.2	41.7	37.5	28.1	23.1	22.8	34.8	25.6	29.3	33.2		
Maid 66 Tube 1	32.5	47.1	41.3	42.8	34.5		24.2	42.5	29.8	42.6	55.9	41.6
Maid 66 Tube 2	43.8	42.9	48.5	42.6	34.1	38.7	25.6	43.1	29.6	40.2	55.9	45.4
Maid 66 Tube 3	37.2	46.4	47.3	41.2	33.8	38.2	20.4	44.2	26.5	46.3	55.8	44.4
Maid 67	32.6	32.5	38.9	23.7	22.6	17.2	104.3	18.5	29.4	23.4		30.5
Maid 68	48.9	56.2	50.2	39.5	33.5		34.9	38.6	44.3	46.7	48.3	50.8
Maid 69	41	38.4	32.9	26.3	22.5	21.2	24.1	26	29.6	33.6		41.7
Maid 70	61.9	58.4	58.3	44.5	42.3	35.6	25.6	42.8	48.1	47.1	51	58.1