



Maidstone Local Plan Examination

Response to Inspector's Session 12 Questions: Transport

*Prepared on behalf of
Countryside Properties (UK) Ltd*

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1 Introduction

1.1 Overview

- 1.1.1 This evidence is submitted on behalf of our client, Countryside Properties (UK) Ltd, in respect of the emerging Maidstone Local Plan.
- 1.1.2 Countryside Properties (UK) Ltd has recently secured a Resolution to Grant outline planning consent for residential development at Land South of Sutton Road, which is allocated by virtue of Policy H1(10) of the submitted Local Plan. Our client wishes to comment on the soundness of the transport evidence underpinning both this Policy and Policy DM24 of the submitted Local Plan.
- 1.1.3 This Statement specifically responds to the questions raised by the Inspector in relation to these matters.

1.2 Scope of Representations

- 1.2.1 Maidstone Borough Council (MBC) has submitted its Local Plan for Independent Examination. An Examination Programme has been published, which divides the hearings into various sections over six week-long sessions. The first tranche of hearings were held in October 2016 and addressed issues of national policy consistency, housing land supply and other strategic borough-wide policy issues. The subsequent parts, to be heard in November and December 2016, will consider site-specific allocations and more generic planning issues.
- 1.2.2 This Statement constitutes Countryside Properties (UK) Ltd's formal response to questions raised by the Inspector in relation to Session 12 – Issue (ii) only.

2 Response to The Inspector's Questions

2.1 Overview of Evidence

2.1.1 The Inspector has raised six questions in respect to matters relating to South and East Maidstone, Policy DM24 and the Integrated Transport Strategy. Whilst the majority of these questions are directed to Maidstone Borough Council (MBC) and Kent County Council (KCC), we also take the opportunity to respond where we feel we can add to the discussion and assist the Examination.

2.2 Question 12.9 – Is there a Statement of Common Ground between KCC and MBC?

Question 12.10 – Would KCC and MBC please provide an update of their respective positions in the light of the results?

2.2.1 A Statement of Common Ground (SoCG) between KCC Highways and Transportation (KCC H&T) and MBC was issued in September 2016. The purpose of the Statement is to clarify and amplify matters of agreement between the Local Planning and Highway Authorities with respect to the Local Plan and its supporting evidence base.

2.2.2 The SoCG includes a list of highway improvement schemes – which are included in the submitted Local Plan and Integrated Transport Strategy – that were agreed as priorities at the Duty to Cooperate meeting between the two authorities on 12th May 2016 and which build upon the resolution of the Maidstone Joint Transportation Board (JTB) at its meetings on 7th December 2015 and 13th July 2016.

2.2.3 The Statement confirms the agreement of both authorities that these schemes will adequately mitigate Local Plan growth up to 2022; a position which was reiterated by KCC's Head of Transportation, Tim Read, at the Transport Modelling Seminar informing the Local Plan Examination on Thursday 6th October 2016. At the end of that hearing, the Inspector asked Mr Read the following question relating to these schemes:-

"If the measures are approved by Him (KCC's Cabinet Member for Environment and Transport), will the County Council then not be pursuing objections insofar as they relate to matters up to 2022? Is that the case?"

2.2.4 To which Mr Read responded:-

"That is correct Sir".

2.2.5 The highway improvement schemes identified for South East Maidstone are as follows:-

10. Improvements to capacity at the junctions of Willington Street / Wallis Avenue and Sutton Road.
11. Package of measures to significantly relieve traffic congestion on Sutton Road and Willington Street.

12. A229 / A274 Wheatsheaf junction: Capacity improvements.
13. A229 Loose Road / Armstrong Road junction: Capacity improvements.
14. A229 Loose Road / Boughton Lane / Cripple Street junction: Capacity improvements.
15. A20 Ashford Road / Willington Street junction: Capacity improvements.

2.2.6 The Transport Assessment accompanying Countryside Properties (UK) Ltd's outline planning application in respect to Land South of Sutton Road has conclusively demonstrated how identified and costed capacity improvements at the aforementioned junctions (with the exception of the A229 Loose Road / Boughton Lane / Cripple Street junction, which is situated on a distinct highway corridor) will adequately mitigate the impact of all nine committed and/or allocated residential developments in South East Maidstone. In most cases, moreover, a degree of planning gain would be provided. These developments are as follows:-

- Planning Application Reference: MA/12/0986 – Land Rear of Police Headquarters, Sutton Road (Policy H1(27));
- Planning Application Reference: MA/12/0987 – Land Rear of Kent Police Training School, St Saviours Road (Policy H1(28));
- Planning Application Reference: MA/13/1149 – Land at Langley Park (Policy H1(5));
- Planning Application Reference: MA/13/0951 – Land North of Sutton Road (Policy H1(6));
- Planning Application Reference: MA/13/1523 – Land West of Bicknor Farm Cottages (Policy H1(6));
- Planning Application Reference: 14/505692/FULL – Bicknor Farm, Sutton Road, Otham (Policy H1(9));
- Planning Application Reference: 15/509251/OUT – Land North of Bicknor Wood, Gore Court Road, Otham (Policy H1(7));
- Planning Application Reference: 15/509015/OUT – Land South of Sutton Road, Langley (Policy H1(10));
- Land West of Church Road, Otham (Policy H1(8)).

2.2.7 The findings of the Transport Assessment have been agreed by MBC's independent transport consultants, Mott MacDonald, and have been cited as part of the evidence base underpinning the Borough Council's Transport Topic Paper (Reference: SUB 006) for the Examination.

2.2.8 The off-site junction mitigation measures identified in the Transport Assessment (full details of which can be provided on request) have been progressed to a far more advanced level of detail than is strictly necessary for an outline planning application. This reflects our understanding of the overriding importance of highway infrastructure enhancements to the achievement of sustainable housing growth in South East Maidstone, our desire to provide

local residents with certainty over their deliverability and the current political landscape. The proposed junction improvements are achievable within Highway land, take full account of the impact on utilities and have been costed by the same consultant that KCC H&T uses to price its own major highway schemes. Moreover, at a meeting between Countryside Properties (UK) Ltd, Bellway Homes, Jones Homes, KCC H&T and MBC, Tim Read agreed that our scheme costing exercise was sound and that should outline planning consent be granted for Land South of Sutton Road, the County Council would seek to implement the junction improvements with Section 106 funding.

- 2.2.9 In respect to the A229 / A274 Wheatsheaf junction, it is fully appreciated that there is strong opposition locally to the proposal to close Cranborne Avenue to traffic seeking to enter the junction. This measure was originally proposed by Countryside Properties (UK) Ltd on the basis that it was at that time being promoted through KCC H&T's A229 Corridor Study and also featured in the draft Integrated Transport Strategy. Following the Maidstone Joint Transportation Board's recommendation that an alternative scheme proposal should be identified for this junction, we have worked with MBC and Mott MacDonald to that end.
- 2.2.10 Whilst no allowance for mode shift from car to walking, cycling and/or public transport was made in the Transport Assessment for Land South of Sutton Road, to ensure that a robust assessment of development impacts on highway capacity was made, we are aware that the VISUM modelling undertaken by KCC H&T's consultants – as reflected in the agreed Integrated Transport Strategy – assumes a 6% reduction in car trips within the Maidstone urban area by 2031. This level of mode shift is considered realistic and has been exceeded in towns with similar characteristics to Maidstone where a coordinated package of sustainable transport measures has been implemented.¹ Working with Mott MacDonald, we have established that mode shift of just 3% by the end of the Local Plan period, combined with upgraded traffic signal technology (i.e. the installation of Puffin crossings and SCOOT), would fully mitigate the impact on the Wheatsheaf junction of the allocated residential developments in South East Maidstone. This would avoid the need to close the Cranborne Avenue arm of the junction.
- 2.2.11 MBC has already secured planning obligations relating to highway capacity improvements to the A274 Sutton Road corridor in respect to five of the above committed developments and further such contributions are required from the remaining sites as part of their respective Local Plan Policies. In the case of Land South of Sutton Road, this is reflected in the draft Section 106 Agreement, which is due to be finalised before the end of the year.
- 2.2.12 It is therefore apparent that there is agreement between KCC H&T, MBC and the promoters of the allocated residential sites in South East Maidstone (which will be substantially complete by 2022) that the impact of Local Plan growth in this part of the urban area can be adequately mitigated in accordance with Paragraph 32 of the National Planning Policy Framework (NPPF) and that this mitigation is deliverable in the short-term.
- 2.2.13 In addition to the highway mitigation strategy outlined in the SoCG, it should be noted that MBC is also seeking significant enhancements to the public transport, walking and cycling

¹ A study of the impact of sustainable transport interventions in Darlington, Peterborough and Worcester for the Department for Transport reported a decrease in car trips of 9% in response to a range of measures employed (Cairns, S., Sloman, L., Newson, C., Anable, J., Pridmore, A. and Goodwin, P., 2010, 'The Effects of Smarter Choice Programmes in the Sustainable Travel Towns: Summary Report').

networks in South East Maidstone through relevant Local Plan policies. In respect to Land South of Sutton Road, these will include the provision of high-frequency bus services to and from Maidstone Town Centre and potentially also Bearsted and Headcorn railway stations, together with complementary infrastructure upgrades, new and improved pedestrian and cycle routes to Langley and Park Wood, and a site-wide Travel Plan promoting sustainable modes of travel to future residents.

- 2.2.14 The outstanding area of disagreement between the Local Planning and Highway Authorities relates to the transport strategy for period between 2022 and 2031. Whilst MBC considers that the Local Plan and Infrastructure Delivery Plan set out a satisfactory package of transport mitigation measures over the full Plan period to 2031, KCC H&T considers that further interventions are required; specifically a Leeds-Langley Relief Road.

2.3 Question 12.11 – What is the likely first date by which any Leeds-Langley Relief Road could become operational and if a route (and funding) were agreed such that it could be included in the first Local Plan Review, could it realistically be implemented before the end of the Local Plan period?

Question 12.12 – How might such a road be funded?

- 2.3.1 As has been noted, KCC H&T is now in agreement with MBC that the transport impacts of Local Plan growth to 2022 can be adequately mitigated by the highway improvement schemes identified in the SoCG. It has been demonstrated by the Transport Assessment accompanying the outline planning application in respect to Land South of Sutton Road that this includes the impact of the nine allocated residential developments in South East Maidstone identified in Paragraph 2.2.4 (above). It is therefore evident that a Leeds-Langley Relief Road is not required to mitigate the vehicular trip generation of these developments.
- 2.3.2 The submitted Local Plan identifies Maidstone Town Centre, Invicta Park Barracks and Lenham as future broad locations for housing growth, where the expectation is that development will not take place until the latter end of the Plan period (i.e. 2026 to 2031). Policy H2 of the Local Plan suggests that these broad locations have the potential to deliver 3,500 homes.
- 2.3.3 It is evident that these locations are distant from South East Maidstone and would not in themselves trigger the requirement for a Leeds-Langley Relief Road, as such an intervention would not enhance their highway connectivity to key local or regional destinations. It would not therefore be reasonable for MBC to seek funding contributions to the scheme from developments in these locations, as such requests would not be necessary to make the development acceptable in planning terms, would not be directly related to the development and would not be fairly and reasonably related in scale and kind to the development. On this basis, there is considered to be insufficient justification for the inclusion of the Relief Road in the Local Plan strategy to 2031 at this time.
- 2.3.4 KCC H&T's report to the Maidstone Joint Transportation Board on 14th October 2015 stated that an initial desktop exercise by its transport consultants had identified a cost estimate of approximately £50 million for the Leeds-Langley Relief Road. In view of the preceding analysis, it is evident that this cost could not be met either in part or in full from developer contributions arising from allocated sites in the submitted Local Plan. Moreover, since current Government funding streams for highway infrastructure are principally aligned to the delivery of

contingent housing and/or employment growth, it is not considered that there is a realistic prospect of securing such funding for the scheme in the medium-term.

2.3.5 Moreover, such contributions would likely come at the expense of a more broadly based transport mitigation strategy targeted at enhancing multi-modal transport capacity, with an emphasis on public transport, walking and cycling, as advocated by the National Planning Policy Framework, the National Planning Practice Guidance and the submitted Local Plan.

2.4 Question 12.13 – In the interim, and before a route or funding has been identified for any relief road, should mitigation works be carried out on the existing network to address the impact of development that has already been committed?

2.4.1 On the basis of the preceding analysis, it is apparent that there is agreement between the Local Planning and Highway Authorities that the highway improvement schemes identified in the SoCG will adequately mitigate the impact of the allocated sites in South East Maidstone. It is therefore considered vital that these works are undertaken prior to 2022, in order that the highway capacity benefits of this mitigation are realised as early as possible in the Plan period. This will require strong cooperation between KCC H&T and MBC to ensure that the necessary detailed design, public consultation, Council approval and contractor procurement processes are progressed in a timely fashion.

3 Conclusion

3.1 Summary

- 3.1.1 This evidence is submitted on behalf of our client, Countryside Properties (UK) Ltd, in respect of the emerging Maidstone Local Plan. It has been demonstrated that Kent County Council Highways and Transportation is now in agreement with Maidstone Borough Council that the transport impacts of Local Plan growth to 2022 can be adequately mitigated by the highway improvement schemes identified in their Statement of Common Ground.
- 3.1.2 The Transport Assessment accompanying the outline planning application in respect to Land South of Sutton Road has conclusively shown that this includes the impact of the nine residential developments in South East Maidstone that are subject to an allocation in the submitted Local Plan. It is therefore evident that a Leeds-Langley Relief Road is not required to mitigate the vehicular trip generation of these developments and that the identified improvements to the existing highway network should proceed at the earliest opportunity.