

# Transport and Air Quality Topic Paper

Planning is a technical process, driven by legislation and government policy and advice. This topic paper uses a number of acronyms and technical terms, so the glossary below has been prepared to assist the reader.

<b>Acronym</b>	<b>Term</b>	<b>Description</b>
AQMA	Air Quality Management Areas	Air quality management areas: Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.
CIL		The Community Infrastructure Levy (the 'levy') is a charge which can be levied by local authorities on new development in their area.
	Clean Air Zones	A Clean Air Zone defines an area where targeted action is taken to improve air quality and resources are prioritised and coordinated in order to shape the urban environment in a way that delivers improved health benefits and supports economic growth.
	Development Plan	Is defined in section 38 of the Planning and Compulsory Purchase Act 2004, and includes adopted local plans, neighbourhood plans that have been made and published spatial development strategies, together with any regional strategy policies that remain in force. Neighbourhood plans that have been approved at referendum are also part of the development plan, unless the local planning authority decides that the neighbourhood plan should not be made.
DPD	Development Plan Document	A DPD is a spatial planning document that is subject to independent examination. Under new regulations, DPDs are now known as local plans.
	Garden Settlement	<ul style="list-style-type: none"> <li>• a purpose-built new settlement, or large extension to an existing town</li> <li>• a community with a clear identity and attractive environment</li> <li>• it provides a mix of homes, including affordable and self-build</li> <li>• planned by local authorities or private sector in consultation with the local community</li> </ul>
	Leeds-Langley Relief Road	The Relief Road has over recent years been contemplated as a 50mph single carriageway - where the design standards would be more sympathetic to the topography, land use and local hamlets - providing

Transport and Air Quality Topic Paper (June 2020)

		<p>environmental benefits by removing through traffic from both villages.</p> <p>The scheme supports the Strategic Statement objectives of supporting existing businesses and encouraging economic activity with housing growth and job creation by reducing congestion and improving infrastructure and accessibility.</p>
LP17	Maidstone Borough Local Plan	<p>The Maidstone Borough Local Plan is the key document that sets the framework to guide the future development of the borough. It plans for homes, jobs, shopping, leisure and the environment, as well as the associated infrastructure to support new development. It explains the 'why, what, where, when and how' development will be delivered through a strategy that plans for growth and regeneration whilst at the same time protects and enhances the borough's natural and built assets. The plan covers the period from 2011 and 2031.</p>
NPPF	National Planning Policy Framework	<p>The NPPF was published in February 2019 and it sets out the government's planning policies for England and how these must be applied. Local plan policies must be in conformity with the NPPF.</p>
	Neighbourhood Plan	<p>A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the <a href="#">Planning and Compulsory Purchase Act 2004</a>.</p>
	Previously Developed Land	<p>Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.</p>
PPG	Planning Practice Guidance	<p>The PPG provides additional guidance on how the national policies in the National Planning Policy Framework should be interpreted and applied.</p>
SA	Sustainability Appraisal	<p>The SA is a tool for appraising policies to ensure they reflect sustainable development objectives, including social, economic and environmental objectives.</p>
	Sustainable Transport	<p>Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.</p>
SPD	Supplementary planning documents	<p>An SPD provides further detail to a policy or a group of policies set out in a local plan. A SPD can provide additional detail about how a policy should be applied in practice. SPDs are a material consideration in planning decisions but are not part of the development plan.</p>



## **Background/Context**

This topic paper considers transport matters that are pertinent to considering and comparing suitable approaches to the transport strategy developed as part of the Local Plan Review. It also addresses the matter of air quality in the borough, given that areas designated as having poor air quality are directly attributable to vehicle emissions. Transport infrastructure can be either a key driver of growth or a critical constraint to growth, and must be considered from both perspectives throughout the Local Plan Review process. As such, the aim of a transport strategy in this context is not only to seek to minimise or mitigate the impact that growth has on the transport networks and air quality, but also to recognise opportunities to drive growth in certain areas and provide enhancements above the status quo.

## **Legislative Requirements**

### **Environmental Assessment of Plans and Programmes Regulations 2004**

– Sustainability appraisals incorporate the requirements of these regulations.

### **Climate Change Act 2008 and (2050 Target Amendment) Order 2019**

– Sets overarching national targets for reducing greenhouse gases. It establishes a legally binding target to reduce the UK's greenhouse gas emissions by 100% in 2050 from 1990 levels.

**Localism Act 2011** – Introduced the duty to cooperate.

**Highways Act 1980 (as amended)** - This Act covers the management, operation and development of the public highway. The most pertinent sections for the Local Plan Review include Part 3, Creation of Highways; Part 5, Improvement of Highways; Part 10, New Streets; Part 12, Acquisition, vesting and transfer of land; Part 13, Financial Provisions (including s278 agreements).

**Environment Bill 2020** – The Bill will implement a new statutory cycle of target setting, monitoring, planning, and reporting to help deliver significant, long-term environmental improvements and a framework for setting legally-binding targets in four priority areas: air quality, waste and resource efficiency, water, and nature. The Bill will further enable greater local action on air pollution, ensuring responsibility is shared across local government structures and public bodies; better enabling them to tackle emissions from burning coal and wood; and bringing forward powers for government to mandate recalls of vehicles and machinery when they do not meet relevant legal emission standards.

## **National Policy and Guidance Requirements**

### **National Planning Policy Framework (NPPF)**

Section 9 of the 2019 updated National Planning Policy Framework (NPPF), "Promoting Sustainable Transport", is of most direct relevance to the Transport Strategy element of the Local Plan Review.

The NPPF specifically sets out important criteria that planning policies should achieve (paragraph 104). These include, but are not limited to:

- Supporting appropriate mixes of land use types, particularly within larger scale development sites, to minimise the number and length of vehicle trips.
- Working closely with local highways authorities and other key stakeholders to align strategies and investments in relation to transport infrastructure.
- Identifying and protecting sites and routes which have evidenced potential to play a critical role in the development of enhanced travel options and in unlocking the potential of large-scale developments through the provision of transport infrastructure.
- Providing high quality walking and cycling infrastructure.

The NPPF requires transport issues to be considered from the earliest stages of plan making and development proposals (paragraph 102). This is in order to ensure that the potential impacts on the transport network and the environment can be identified and addressed. It is also to ensure that opportunities to enhance sustainable transport infrastructure and promotion are identified and realised. Consideration of transport issues from the earliest stages of plan making also provides the opportunity to ensure that the patterns of movement, street layout, parking, etc., are made integral to the design of schemes and therefore contributes positively towards making "high quality places."

The NPPF requires that significant development should be allocated in locations which are, or can be made, sustainable through limiting the need to travel and encouraging the use of sustainable forms of transport (paragraph 3).

It sets out the requirement that can be expected from planning applications, in terms of transport sustainability (paragraph 103), and states that planning applications should:

- Prioritise pedestrian and cycle movements first, both within the scheme and in neighbouring areas.
- Give second highest priority, following pedestrian and cycle movements, to facilitating access to high quality public transport.
- To address the needs of people with disabilities and impaired mobility in relation to all sustainable forms of transport.
- To create places that are safe, secure and attractive. Design should actively minimise the potential for conflict between different types of road user, avoid unnecessary street clutter and to respond to local character and design standards.
- Enable efficient delivery of goods and access by service and emergency vehicles.
- Enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

The NPPF states that the supply of large numbers of new homes can often be best achieved using large scale, Garden Settlement type sites (paragraph 72).

This is, however, provided they are well located and designed as well as being supported by the necessary infrastructure and facilities.

The NPPF addresses the requirement for planning policies and decisions in terms of pollutants and air quality (paragraph 181). It requires plans and decisions to contribute positively towards relevant objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones as well as the cumulative impacts of individual sites in local areas. Similar to Paragraph 102, this section of the NPPF also requires that plans and policies should identify and pursue, where possible, measures to improve air quality or mitigate the are quality impacts of growth.

### **National Planning Practice Guidance (PPG)**

There is a specific PPG on **air quality** which sets out the main considerations including Air Quality Management Areas. The PPG states that 'consideration of air quality issues at the plan-making stage can ensure a strategic approach to air quality and help secure net improvements in overall air quality where possible'. The PPG looks at air quality impacts of new developments and the mitigation that might be appropriate.

Other national policy of relevance to the transport strategy:

- Manual for Streets (Department for Transport) – Provides guidance on highway design and transport infrastructure requirements in urban areas
- Manual for Streets 2 (Department for Transport) – Same as above but focused on rural and out of town settings
- Design Manual for Roads and Bridges (Department for Transport) – This is the equivalent of Manual for Streets, but for trunk roads, dual carriageways. major junctions and some rural areas.

### **Ministerial statements**

There are no Ministerial Statements that significantly change the overall approaches set out in this paper.

### **Maidstone Borough Local Plan 2017 (LP17) Policies: Strategic vs Non-strategic**

The NPPF considers infrastructure for transport to be a strategic matter for which local plans should make provision for and set out an overall strategy for the pattern, scale and quality of development through strategic policies.

### **Key Strategic Policies**

**SP23** (Sustainable Transport) outlines schemes for mitigating the impact of development on transport networks and facilitating transport improvements in line with the proposed levels of growth. These include improving transport choices across the borough and improved strategic links to Maidstone.

**SP1** (Maidstone Urban Area) outlines key transport improvements for the Maidstone Urban Area. This includes improvements to highway and transport infrastructure, improved pedestrian/cycle access and bus prioritisation measures in accordance with criteria set out in policies H1(11) to H1(31) and policies RMX1(1) TO RMX1(3).

**SP2** (Maidstone Urban Area: north west strategic development location) outlines key transport improvements for the strategic development location. This includes improved pedestrian and cycle access, public transport including a new bus loop as set out within individual site criteria in policies H1(1) to H1(4).

**SP3** (Maidstone Urban Area: south east strategic development location) outlines key transport improvements for the strategic development location. This includes the installation of an extended bus lane in Sutton Road and improved pedestrian and cycle access in accordance with site criteria in policies H1(5) to H1(10).

**SP4** (Maidstone Town Centre) seeks achieve improved accessibility to the town centre through the Integrated Transport Strategy and Infrastructure Delivery Plan.

**SP6** (Harrietsham Rural Service Centre) sets out Improvements to highway and transport infrastructure, including improvements to the A20 Ashford Road, improvements to Church Road and the provision of additional pedestrian crossing points in accordance with individual site criteria set out in policies H1(32) to H1(34).

**SP7** (Headcorn Rural Service Centre) outlines improvements to transport infrastructure including sustainable transport and improvements to pedestrian and cycle access in accordance with policies H1(35) to H1(40).

**SP8** (Lenham Rural Service Centre) acknowledges Lenham as a broad location for growth. Key transport requirements include junction improvements, sustainable transport and improvements to pedestrian access in conjunction to criteria in policies H(41) and H(42).

**SP9** (Marden Rural Service Centre) outlines improvements to transport infrastructure including railway station enhancements, sustainable transport infrastructure and improved pedestrian access in accordance to criteria in policies H1(43) to H1(47).

**SP10** (Staplehurst Rural Service Centre) outlines improvements to transport infrastructure including a variety of measures to improve sustainable transport infrastructure, improved pedestrian and cycle access in conjunction to criteria in policies H1(48) to H1(50).

**SP12** (Boughton Monchelsea Larger Village) outlines improvements to transport infrastructure including a variety of measures to improve sustainable transport as set out in policy H1(51).

**SP13** (Coxheath Larger Village) outlines improvements to transport infrastructure including a variety of measures to improve sustainable transport

and pedestrian access as set out in criteria of individual policies H1(56) TO H1(60).

**SP16** (Yalding Larger Village) outlines improvements to transport infrastructure including improvements to pedestrian access, in accordance with individual site criteria in policy H1(65).

**ID1** (Infrastructure Delivery) sets out how growth needs to protect existing infrastructure as well as secure new infrastructure. This includes physical, community (CIL) and green infrastructure.

### **Non-strategic Policies**

**DM21** (Assessing the transport impacts of development) sets out measures and initiatives that should be incorporated in development proposals such as public transport and highway infrastructure.

**DM22** (Park and ride sites) outlines individual allocations for park and ride services.

**DM23** (Parking Standards) sets out criteria for vehicle parking standards for both residential and non-residential purposes.

**DM25** (Electronic Communications) sets out criteria for which new infrastructure for telecommunications should be permitted.

**LPR1** (Review of the Local Plan) - requires the review to consider the following:

- **LPR1v** (Whether the case for a Leeds-Langley Relief Road is made, how it could be funded and whether additional development would be associated with the road).
- **LPR1vi** (Alternatives to such a relief road).
- **LPR1vii** (The need for further sustainable transport measures aimed at encouraging travel shift to reduce congestion and air pollution).

### **Relevant Supplementary Planning Documents (SPD) and Planning Policy Advice Notes**

**Kent Design Guide 2005 (2009)** - Sets out a guide for developers and others to achieve high standards of design and construction. This provides local authorities with a common approach to the main principles when assessing planning applications.

**Kent and Medway Structure 2006: SPG4 Vehicle Parking Standards** - Sets out vehicle parking standards for individual land use classes.

**Air quality planning guidance** - Whilst this document supports relevant local plan policies its primary purpose is to provide a process for development mitigation.

## **Maidstone Strategic Plan Requirements**

The Strategic Plan sets out the Council's aspiration through to 2045, the vision is '*Maidstone: a vibrant, prosperous, urban and rural community at the heart of Kent where everyone can realise their potential*'. One of the cross-cutting objectives of the Maidstone Strategic Plan focuses on improving social mobility. Relevant priorities based on the vision are:

### **Embracing Growth and Enabling Infrastructure**

- The outcome of this for 2045 is: Sufficient infrastructure is planned to meet the demands of growth.
- The focus between 2019 – 24 is: Working with partners to get infrastructure planned, funded and delivered.

### **Safe, Clean and Green**

- The outcome of this for 2045 is: A Borough that is recognised as clean and well cared for by everyone.
- The focus between 2019 – 24 is: Improving air quality.

### **The requirements in meeting these priorities include:**

- Contributing to an overall improvement in air quality, in particular in the Maidstone Air Quality Management Area.
- Ensuring sufficient transport infrastructure is provided to serve the new development that is planned.

## **Kent County Council (KCC) Policy Framework**

**Kent Design Guide** - Sets out requirements for highway infrastructure and defines the different standards of road required to accommodate different scales of development, among other important considerations.

### **Kent Environment Strategy**

- Highlights the significant local effect of the transport network on the environment.
- Identifies the increasing levels of congestion in particular areas of the county, specifically referencing Maidstone town centre and that this represents a potential constraint on growth.
- States the need for "a shift to active travel" and "an increase in use of public transport".
- Recognises the importance of evidence-based approaches in planning for transport infrastructure and strategy.

**The emerging Kent & Medway Energy and Low Emissions Strategy (ELES)**  
– This is a sub strategy of the Kent Environment Strategy. This includes strategies and actions to reduce carbon emissions, eliminate poor air quality, reduce fuel poverty and deliver an affordable, clean and secure energy supply.

**Kent Active Travel Strategy** - The overarching ambition of the Active Travel Strategy (ATS) is to “*make active travel an attractive and realistic choice for short journeys in Kent*”.

Key outcomes identified to achieve that ambition are:

- Improved health through an increase in physical activity
- Reduced congestion on the highway network by providing better travel choices
- Safer active travel.

The ATS identifies that the greatest barrier to propensity to walk and cycle is a lack of safe, suitable infrastructure.

### **Other Key Plans and Strategies (incl. Neighbourhood Plans)**

**Neighbourhood Plans** - Form part of the Maidstone Development Plan. There are four made plans:

- North Loose Neighbourhood Plan 2015 – 2031 (2016)
- Staplehurst Neighbourhood Plan 2016 – 2031 (2016)
- Loose Neighbourhood Plan 2018 – 2031 (2019)
- Marden Neighbourhood Plan 2017 – 2031 (2020).

The neighbourhood plans have consideration for the transport and air quality needs of the neighbourhood plan area.

**Department for Transport, The Road to Zero (2018)** - Policies include:

- Reduce emissions from the vehicles already on our roads.
- Drive uptake of the cleanest new vehicles.
- Reduce emissions from heavy goods vehicles (HGVs) and road freight.
- Put the UK at the forefront of the design and manufacturing of zero emission vehicles.
- Support the development of one of the best electric vehicle infrastructure networks in the world.
- Support local action.

**Air Quality Annual Status Report (2018)** - Contains an action plan for the Borough of Maidstone that outlines many projects varying in topic and timeframe. The main priority and challenge for the Council with regards to air quality is to tackle poor air quality within the AQMA and to identify any further areas of poor air quality.

**Maidstone Borough Council Air Quality Planning Guidance (2017)** - Provides developers and the wider community with clear information about Maidstone Borough Council’s information requirements and its overall approach to determining planning applications in respect of air quality.

**Integrated Transport Strategy (ITS) (2011-2031)** - Has a vision of *'Realising Maidstone's sustainable future; connecting communities and supporting a growing economy'*.

Objectives:

- Enhancing and encouraging sustainable travel choices
- Enhancement of strategic transport links to, from and within Maidstone town
- Ensure the transport system supports the growth projected by Maidstone's Local Plan
- Reducing the air quality impacts of transport
- Ensure the transport network considers the needs of all users, providing equal accessibility by removing barriers to use.

Strategic priorities:

- Reduce demand for travel
- Change travel behaviour
- Promote travel shift
- Improve network efficiency.

**Maidstone Walking & Cycling Strategy 2011-2031** - Sets out the following objectives:

- Enhancing and encouraging sustainable travel choices including:
  - A: The development, maintenance and enhancement of walking and cycling provision, through network improvements and encouraging uptake amongst the population.
  - C: Promotion and education regarding walking, cycling and public transport travel options.
  - E: Place sustainable travel options at the heart of all new developments within Maidstone, to ensure a fully integrated network that puts pedestrians, cyclists and public transport users at the centre of any transport proposals.
- The enhancement of strategic transport links to, from and within Maidstone town.
- Ensure the transport system supports the growth projected by the Maidstone Borough Local Plan.
- Reducing the air quality impacts of transport.
- Ensure the transport network considers the needs of all users, providing equal accessibility by removing barriers to use.

**Low Emission Strategy (2017)** - Sets out the following aims:

- To achieve a higher standard of air quality across Maidstone.
- To assist Maidstone Borough Council in complying with relevant air quality legislation.

- To embed an innovative approach to vehicle emission reduction through integrated policy development and implementation in Maidstone and across the region.
- To improve the emissions of the vehicle fleet in Maidstone beyond the 'business as usual' projection, through the promotion and uptake of low and ultra low emission vehicles.
- To reduce emissions through an integrated approach covering all appropriate municipal policy areas. Under each area, the specific actions aimed at reducing emissions will be developed.

**Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 -**

Sets out Kent County Councils strategy and implementation plan for local transport for the period of 2011 to 2031. Priorities for Maidstone include:

- M20 Junctions 3-5 motorway system.
- Maidstone Integrated Transport Package, including M20 Junction 5 and northwest Maidstone improvements.
- Thameslink extension to Maidstone East by 2018 giving direct services to the City of London.
- A229/A274 corridor capacity improvements.
- Public transport improvements on radial routes into town.
- Leeds and Langley Relief Road.
- M20 Junction 7 improvements.
- Bearsted Road corridor capacity improvements.
- Public transport improvements (redevelop Maidstone East, refurbish Maidstone bus station, and bus infrastructure improvements).
- Maidstone walking and cycling improvements.
- Junction improvements and traffic management schemes in the Rural Service Centres.

**Kent and Medway Growth and Infrastructure Framework (GIF) 2018 update** - Sets out emerging development and infrastructure requirements to support growth across Kent and Medway. The main sustainability issue for Maidstone relevant to transport is that the highway network is severely congested including in the centre of Maidstone.

**Network Rail South East Route: Kent Area Route Study (May 2018)** - Sets out a vision for the future of the south east rail network over the next 30 years. This study seeks to improve connections between people, jobs, businesses and markets.

**Democratic Resolutions (Full Council/Committees)**

**Maidstone Borough Integrated Transport Strategy (ITS) Update (SPI 25.06.2019)** - Resolved that efforts should be focused on advancing specific ITS actions H1, PT1 and PT2. It was also agreed that the 'Route Corridor Walking and Cycling Assessment: The A20 London Road, Maidstone (May 2019)' be approved for publication.

## **Meeting Objectively Assessed Need**

Transport infrastructure will be required to support the objectively assessed housing need target; and the evidenced employment, leisure, and retail needs and the subsequent development options for meeting these needs.

## **Supporting Evidence (Current and Future)**

Transport evidence fed in to the LPR to date includes:

- Guidance from KCC Highways on the basic viability of Call for Sites proposals, in terms of realistic potential to achieve:
  - Suitable access to the highway network, based on Kent Design Guide requirements.
  - A base level of sustainability, determined by performance against a set of criteria around proximity of, connectivity to and quality of sustainable travel facilities and infrastructure.
- Early engagement with infrastructure providers regarding the potential impacts on their services from potential growth in relation to transport.
- Regulation 18a consultation feedback.

Transport evidence under development:

**A Local Cycling and Walking Infrastructure Plan** - These enable a long-term approach to developing local cycling and walking networks, ideally over a 10 year period, and form a vital part of the Government's strategy to increase the number of trips made on foot or by cycle.

**An Integrated Transport Strategy<sup>1</sup>** - This assesses the principal existing and future challenges affecting the transport network, including taking account of jobs and housing growth, and recognises that the populations of the urban area and dispersed villages bring different challenges and solutions.

**Maidstone Transport and Air Quality Modelling Project** - The methodology in place for this project follows a recognised approach to local plan transport assessments. The project has been split into two stages in order to assist the Council in achieving shorter timescales for delivery than would otherwise be achievable while maintaining a fully robust, evidence driven approach.

The full project is expected to:

- Understand the infrastructure implications of planned growth, including growth from neighbouring authorities, and strategic improvements such as the Lower Thames Crossing.
- Provide a transport evidence base to inform a preferred Local Plan Review (LPR) option.

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<sup>1</sup> The production of this document is to be confirmed.

- Inform the spatial strategy beyond this LPR period with a view to longer term “Garden Settlement” / “Strategic Expansion” sites.
- Support the development of an updated Integrated Transport Strategy (ITS), providing evidence to identify specific mitigation measures to reduce the impact of growth on congestion, pollution and highway safety.
- Through the above, to discharge the transport elements of the adopted policy LPR1 (Review of the Local Plan).

Stages 1 and 2 of this project are inherently linked, although completion of Stage 2 will require the Kent Model to be available for the detailed testing of spatial allocation options. To summarise the transport assessment side of the site allocation proposals process:

- Stage 1 of the Modelling Project involves developing the evidence base to support Regulation 18b approaches. These approaches will set out a number of options for different quantities of development allocation in different sections or “corridors” of the borough and what mitigation may be required to enable them.
- Stage 2, building on the evidence base of Stage 1, will apply the new Kent Model in order to provide the more detailed and site-specific evidence base for the Regulation 19 Plan (proposing the preferred approach for public consultation).

Stage 1 of the Maidstone Transport Modelling Project does not rule out or explicitly favour any specific sites. Instead, it provides an evidence base to identify the likely transport impacts (congestion, road safety and air quality) that would result from different broad patterns of growth allocation. It also identifies potential transport mitigation measures and to what degree they could provide improvements and / or mitigation of identified potential impacts. The evidence base developed through Stage 1 will feed directly into the Stage 2 work, at which point more detailed and site-specific analysis of potential allocations and improvements will be carried out. Stage 1 of the Transport Modelling project is underway, and Stage 2 is expected to be complete by mid July 2020.

## **Duty to Cooperate**

Transport infrastructure associated with any potential Garden Settlement is likely to have an impact on neighbouring planning authorities, based on their scale and location. It is anticipated that strategic cross-boundary infrastructure would be required such as rail network upgrades, and motorway/road junction improvements. Engagement has already taken place with all neighbouring planning authorities and this will continue and become more focused as potential development approaches progress with the associated implications for cross-boundary infrastructure.

In planning for transport infrastructure, the Council is working constructively and on an ongoing basis with Kent County Council, in its role as Highways Authority, and with Highways England (HE).

The Highways Authority is a key stakeholder and is closely involved in numerous elements of the evidence base which includes reviewing the existing Maidstone traffic model (2018), a Transport Baseline review, and initial testing of development approaches and transport opportunities and challenges. The Highways Authority has been involved at an early stage in respect of potential development sites that came forward under the Call for Sites process. Quarterly Duty to Cooperate meetings are held with the Highways Authority on the Local Plan Review, transport modelling evidence, the Integrated Transport Strategy, and the work the Highways Authority is carrying out in respect of the Leeds Langley Relief Road (LLRR).

The Council has engaged with Highways England (HE) on potential development sites that came forward under the Call for Sites (2019) process and will continue to engage with HE to understand the need for any transport infrastructure associated with the strategic road network to inform decisions made by the Council on the approaches to meeting development needs.

The Council will engage with Network Rail to understand the need for any transport infrastructure associated with the rail network to inform decisions made by the Council on the approaches to meeting development needs.

Statements of Common Ground will be required with the Highways Authority, Highways England, Network Rail, and any neighbouring planning authorities where strategic cross-boundary transport infrastructure is required.

Whilst not strategic bodies for the purposes of the duty to cooperate, the Council will engage with South Eastern Trains and local bus operators to understand the need for any public transport infrastructure associated with potential development approaches.

## **Development Management (DM) Input**

There are no comments that seek to change the overall direction of relevant strategic policies.

## **Regulation 18a (Scoping Themes and Issues) References**

Better transport is a priority for the borough's residents, and the transport issues that the review can help to address are:

- Congestion hotspots
- Poor air quality in the main arterial roads
- High car ownership/low car occupancy and alternatives
- Parking
- Future trends (remote working, online shopping etc),
- Changes to travel pattern and lower Thames crossing impact.

The Council has made a commitment to enable infrastructure even though it recognises that it is the responsibility of others to deliver it. The Council is working with partners to:

- Design healthy places
- Build new roads
- Smart City technology
- Public Transport
- Parking control.

Measures are being considered to reduce people's need to travel, by looking to increase levels of walking, cycling and public transport use.

The following are avenues to identify and specify transport infrastructure requirements due to growth:

- Reviewing Integrated Transport Strategy in collaboration with Kent County Council and Highways England
- Highway Modelling
- Review of the walking and cycling strategy.

The Leeds-Langley Relief Road is a project that is currently under consideration in the borough with Kent County Council.

## **Regulation 18a (Scoping Themes and Issues) References**

In general, responses to the Regulation 18a public consultation showed some consistent themes around transport. The most consistently raised priorities relating to transport were:

- Provision of suitable infrastructure
- Enhancement of public transport provision
- Sustainability of developments, ensuring that they are located and designed to minimise the dependency on cars for regular travel.

The key themes emerging (related to transport) from responses to the overarching questions in the consultation have been summarised.

It appears that all relevant matters have been addressed as part of this consultation, in relation to the social infrastructure topic area.

## **Public Consultation Regulation 18a**

*OQ1: What can the Local Plan Review do to make the growth we need 'good growth'?*

- Strong support for ensuring that the transport infrastructure and improvements necessary to accommodate growth are delivered in line with or before occupation of new developments. Local Highways Authority; Parish Councils (11); Residents (57); Other (20)

- Support for ensuring that transport infrastructure and facilities are planned in a sustainable way (catering for the needs of the future as well as the needs of the present). Parish Councils (6); Residents (14); Other (6)
- Support for collaboration with neighbouring authorities and the community. Parish Council (1); Residents (4); Other (11)
- Support for prioritising housing growth in locations with good connectivity to the strategic road network. Local Highways Authority; Residents (7); Other (9)

*OQ2: What could the Local Plan Review do to help make our town and village centres fit for the future?*

- Support for using the local plan to deliver improved connectivity and accessibility, including for pedestrians and cyclists. Local Highways Authority; Parish Councils (2); Residents (3); Other (5)
- Support for ensuring that parking provision across the borough is suitable to meet demand. Residents (4)

*OQ3: How can the Local Plan Review ensure community facilities and services are brought forward in the right place and at the right time to support communities?*

- Strong support for ensuring that the transport infrastructure and improvements necessary to accommodate growth are delivered in line with or before occupation of new developments. Local Highways Authority; Parish Councils (7); Residents (176); Other (7)
- Support for prioritising development in sustainable locations. Parish Councils (2); Residents (4)
- The Local Highways Authority expressed support for consideration of larger development sites as they are more capable of supporting new or improved infrastructure.

*OQ4: What overall benefits would you want to see as a result of growth?*

- Strong support for the creation of facilities in local areas to reduce the dependency on travel into larger towns. Parish Councils (11); Residents (124); Other (3)
- Responses reflected the desire to see improvements to transport infrastructure and public transport services. Local Highways Authority; Parish Councils (5); Residents (24); Other (7)
- Support for ensuring that sufficient open space and green spaces are made available. County Council; Parish Councils (4); Residents (14); Other (12)
- Support for ensuring that suitable facilities and infrastructure is provided before occupation of new developments. Parish Councils (6); Residents (20); Other (1)
- Responses reflected a desire to see development allocations in suitable locations, which enable integration into the existing community. Parish Council (1); Residents (12)

*OQ5: What infrastructure and services, including community services and facilities, do you think are the most important for a successful new development?*

- Very strong support, including from the Local Highways Authority, for the importance of community and retail facilities for all ages being available within walking distance (GPs, Shops, pub schools etc). Local Highways Authority, Parish Councils (7); Residents (223); Other (12)
- Very strong support for the principle that all new developments should be sustainable. Residents (203); Other (1)
- Support was expressed for the importance of transport infrastructure and suitable parking provisions. Local Highways Authority; Parish Councils (9); Residents (34); Other (3)
- Support for the importance of public transport facilities being upgraded to meet the needs of local and rural areas. Parish Councils (10); Residents (30); Other (2)
- Support for ensuring that infrastructure is continually upgraded to meet demand and changing landscapes and create sustainable communities, including the provision of suitable electric vehicle charging facilities. Local Highways Authority; Parish Councils (7); Residents (24); Other (12)
- Support on the importance of providing safe and attractive walking and cycling routes. Local Highways Authority; Parish Councils (3); Residents (4); Other (1)

*OQ6: How can the Local Plan Review help support a thriving local economy, including the rural economy?*

- Strong support for ensuring that transport infrastructure is able to meet the needs of new developments and minimise the increase of pressure on the network, particularly in rural areas. Parish Councils (5); Residents (286); Other (4)
- Support for ensuring that community facilities are provided in line with growth and in close proximity to developments to reduce dependency on the car. Parish Councils (3); Residents (20); Other (3)

*OQ7: How can the Local Plan Review ensure we have an environmentally attractive and sustainable borough that takes a pro-active approach to climate change?*

- Very strong support for careful consideration of how development could impact on the Maidstone AQMA (Air Quality Management Area) and therefore minimising further strain on the town centre transport network. Parish Council (1); Residents (250); Other (2)
- Support for raising awareness of sustainable lifestyles and adopting resources to reduce the need to travel by car. Awareness of sustainable lifestyles: Residents (18); Other (3); Adopting reducing the need to travel: Local Highways Authority; Parish Council (1); Residents (9); Other (1)
- Support for providing improvements to transport and road infrastructure, including pedestrian infrastructure. Local Highways Authority; Parish Councils (4); Other (15)

*OQ8: Are there any other themes, issues and considerations that you believe we should address as part of this Local Plan Review*

There was a broad range of transport relevant responses to this question, though each response was repeated by a relatively low number of respondents (below 10). Responses included reference to the following priorities:

- Provision of electric vehicle charging.
- Congestion reduction in the urban area.
- Air quality in the town centre.
- Improvement of active travel infrastructure.
- Improvement of public transport provision.
- Addressing issues around HGVs using unsuitable roads.

*TQ27: How can the Local Plan Review best plan for an overall improvement in air quality in the Maidstone Air Quality Management Area, and manage air quality elsewhere, whilst still achieving the growth that is needed?*

- Minimise vehicular transport requirements and maximise access to public transport in both urban and rural areas. Residents (131); Developers (1); Expert agency (5); Councillor (1); Parish Council (2)
- Investment in public transport to provide cheap and regular services and improve traffic flow and air quality. Residents (133); Developers (4); Expert agency (3); County Council (1); Parish Council (4)
- Improve sustainable transport across the borough. Residents (180); Developers (7); Expert agency (2); Parish Council (1)
- Sustainable development (location and density of new development). Residents (208); Expert agency (2); Maidstone BC (1); Parish Council (1)

**Highways England** - While a specific response to this consultation was not received from Highways England (HE), an ongoing process of consultation and communication with HE has been taking place throughout the Local Plan Review process and their advice is considered at every stage. Details of the communication between HE, MBC and KCC are given in the above section titled 'Duty to Cooperate'.

The following points represent a summary of Highways England comments received to date which have a specific relevance to the Regulation 18a consultation:

- It should be ensured that sustainable transport options are utilised, and reliance upon individual vehicle mode share is minimised.
- It should be recognised that mode shift in rural regions is difficult to achieve without access to good sustainable transport options and that there will therefore be a requirement to plan for vehicles in all allocated sites. There is no 'one size fits all' approach.
- Emphasis within housing allocations should be placed upon reducing the need to travel and, where travel is necessary, to use more sustainable modes rather than relying on improvements being in place.

- It should be noted that higher densities do not diminish the need to travel but that they do afford more opportunities for sustainable modes of transport to be utilised. Parking provision within high density developments must be sufficient to meet the needs of the site.
- Any substantial growth, regardless of the specific pattern of allocations, will have an impact on the Strategic Road Network and key motorway junctions. It is of crucial importance that these potential impacts and suitable mitigation measures are identified and robustly assessed.

### **Public Consultation Regulation 18b**

To be completed following Regulation 18b consultation.

### **Public Consultation Regulation 19**

To be completed following Regulation 19 consultation.

### **Deliverability**

The potential transport infrastructure set out in the reasonable alternatives is necessary to facilitate sustainable development and will need to be taken into account when considering the deliverability of potential development approaches, both in terms of the costs of any infrastructure and the timescales for delivery. Transport infrastructure will need to be reasonable, proportionate and viable to ensure it can be delivered. The funding and delivery mechanism(s) will need to be clear for each type of transport infrastructure whether through CIL, planning obligations or planning conditions.

### **Potential Objective(s)**

The following objectives in the current Local Plan are pertinent:

3: To transform the offer, vitality and viability of Maidstone town centre including its office, retail, residential, leisure, cultural and tourism functions together with significant enhancement of its public realm and natural environment including the riverside.

This objective could mention air quality impacts and improvements thereto.

11: To ensure that key infrastructure and service improvements needed to support delivery of the Maidstone Borough Local Plan are brought forward in a co-ordinated and timely manner, and that new development makes an appropriate contribution towards any infrastructure needs arising as a result of such new development.

This objective remains relevant.

Potential new objective:

To ensure that the policies within the revised Local Plan contribute positively towards Maidstone Borough Council's Climate Change and Air Quality objectives (see Environment Topic Paper for climate change issues).

**Reasonable Alternative Approaches**

**Approach A: Continue with LP17 approach**

This approach would involve maintaining the existing approach to the Local Plan Transport Strategy, as set out for the 2017 Local Plan. This would involve:

- Deliver a shift towards sustainable forms of transport through enhanced public transport and continued park and ride services, walking and cycling improvements – bus priority measures along radial routes including prioritisation at junctions; prioritisation of sustainable forms of transport along radial routes; enhanced waiting and access facilities and information systems for passengers, including people with disabilities.
- Improve capacity at key locations and junctions.
- Manage parking in town centre and wider borough.
- Protect and enhance PROW.
- Increased bus service frequency along radial routes into town centre and railway stations.
- New bus station.
- Improve bus links to RSC's and LVs.
- Improve strategic links to Maidstone across county and to London.
- Inclusive for all.
- Address air quality impact of transport.
- Infrastructure Delivery Plan.

**Approach B: LP17 approach plus provision of a section of major new road infrastructure (such as Leeds & Langley Relief Road)**

- All the same measures as in Approach 1.
- In addition, adding in a significant new section of highway infrastructure, such as a LLRR.

**Approach C: Improved public transport helping to re-establish Maidstone Town Centre as a substantially improved economic & retail & service centre in Kent.**

- All the same measures as in Approach 1.
- In addition, including major new public transport infrastructure investment as part of town centre renaissance.
- Make significantly more efficient use of the existing network. This could include new Park & Ride and public transport interchange(s) with appropriate prioritisation measures.

### **Approach D: Garden Settlement focus**

- Minimising transport impact on the existing network by creating high quality large developments with high levels of sustainability and trip internalisation.
- Requires minimal mitigation on the existing network, due to minimised impacts.
- Facilitates Garden Settlement locations and provides improved sustainable transport options for surrounding areas.

### **Tests of Soundness**

1. **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

The reasonable alternatives set out in this paper would mitigate the objectively assessed development needs of the Borough.

2. **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

This paper sets out the reasonable alternatives based on evidence of the transport baseline, and initial testing of development approaches and transport opportunities and challenges. The alternatives are justified as they address the potential approaches to meeting development needs and outline how any impacts can be suitably mitigated through a range of transport infrastructure measures that are compliant with national policy to promote sustainable transport.

3. **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

The reasonable alternatives set out in this paper have been developed following engagement with the Highways Authority and Highways England. Engagement with neighbouring planning authorities will become more focused as potential development approaches progress with the associated implications for any cross-boundary infrastructure.

4. **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

The reasonable alternatives set out in this paper are in accordance with the policies for promoting sustainable transport in chapter 9 of the NPPF. They outline opportunities to support development using existing transport infrastructure and any necessary mitigation, identify new transport infrastructure, and identify opportunities to promote walking, cycling and public transport use.

## **Unreasonable Alternatives**

An unreasonable alternative approach would be the LP17 approach plus provision of large scale new road infrastructure to provide a complete southern bypass. All the same measures as in Approach A, plus the provision of a complete south Maidstone bypass. This approach is unreasonable for this LPR because there is not the quantum of development to fund it, and nor would the road be deliverable within the plan period.

## **Sustainability Appraisal (SA)**

The SA will provide input to help select a preferred approach.

## **What Mitigations Are Required including Infrastructure and Design**

To be completed following publication of the SA.

## **Are the Preferred Approach and Alternatives Reasonable (Yes/No)**

To be completed following publication of the SA.

## Matrix

	Criteria	Approach A: LP17	Approach B: LP17 plus provision of a section of major new road infrastructure	Approach C: Maidstone Town Centre focus	Approach D: Garden Settlement focus
<b>Policy</b>	<b>NPPF/ NPPG consistency</b>	<b>GREEN:</b> Yes.	<b>GREEN:</b> Yes.	<b>GREEN:</b> Yes.	<b>GREEN:</b> Yes.
	<b>Legislative compliance</b>	<b>GREEN:</b> Complies with relevant Regulations.	<b>GREEN:</b> Complies with relevant Regulations.	<b>GREEN:</b> Complies with relevant Regulations.	<b>GREEN:</b> Complies with relevant Regulations.
	<b>Strategic Plan alignment</b>	<b>AMBER:</b> Enables sustainable growth and infrastructure, and limits impacts upon air quality through public transport promotion but to a limited degree. (Priorities 1 & 2).	<b>AMBER:</b> Enables sustainable growth and infrastructure, and limits impacts upon air quality through public transport promotion but LLRR can promote car use and no evidence to support environmental or AQ benefits of LLRR at present. (Priorities 1 & 2).	<b>GREEN:</b> Enables sustainable growth and infrastructure, and limits impacts upon air quality through public transport promotion and strategic transport interchanges (Priorities 1 & 2).	<b>GREEN:</b> Enables sustainable growth and infrastructure, and limits impacts upon air quality particularly the AQMA. (Priorities 1 & 2).
	<b>KCC Policy support</b>	<b>AMBER:</b> This approach was objected to by KCC Highways in the LP17 public consultation. KCC policies, in general, would encourage strategies to achieve the maximum mitigation measures and minimise on the impact of development, which is more difficult to achieve when excluding any large sites.	<b>AMBER:</b> Depending on evidenced viability and impact.	<b>GREEN:</b> This would comply with KCC Active Travel Strategy, Environment Strategy and the emerging Kent & Medway Energy & Low Emissions Strategy.	<b>GREEN:</b> Depending on suitable measures being taken and evidenced to achieve minimal trip generation and a sustainable travel balance.
	<b>Other Plans &amp; Strategies</b>	<b>GREEN:</b> Promotes sustainable transport.	<b>GREEN:</b> Promotes sustainable transport.	<b>GREEN:</b> Promotes sustainable transport, to the greatest extent of the alternatives.	<b>GREEN:</b> Promotes sustainable transport.
<b>Political &amp; Public</b>	<b>SPI</b>	<b>GREEN:</b> Aligns with the ITS.	<b>GREEN:</b> Aligns with the ITS.	<b>GREEN:</b> Aligns with the ITS.	<b>GREEN:</b> Aligns with the ITS.
	<b>Full Council</b>	<b>GREEN:</b> Has previously been accepted.	<b>AMBER:</b> Unknown.	<b>AMBER:</b> Park & Ride sites have been recently closed so may not have support of Full Council.	<b>AMBER:</b> Unknown.
	<b>Public Consultation - Reg 18a</b>	<b>RED:</b> Responses to Reg18a reflected a feeling that this approach was not providing sufficient infrastructure and that allocations were not in sufficiently sustainable locations.	<b>GREEN:</b> Provision of infrastructure was raised by a large number of respondents.	<b>GREEN:</b> Enhancement of public transport provision was raised by a large number of respondents.	<b>AMBER:</b> Dependant on suitable infrastructure provision.
	<b>Public Consultation - Reg 18b</b>	N/A	N/A	N/A	N/A
	<b>Public Consultation - Reg 19</b>	N/A	N/A	N/A	N/A
<b>Technical</b>	<b>Meeting Objectively Assessed Need</b>	<b>GREEN:</b> Would support in meeting OAN.	<b>GREEN:</b> Would support in meeting OAN.	<b>GREEN:</b> Would support in meeting OAN.	<b>GREEN:</b> Would support in meeting OAN.
	<b>Supported by evidence</b>	<b>AMBER:</b> No evidence available at this time.	<b>AMBER:</b> No evidence available at this time.	<b>AMBER:</b> No evidence available at this time.	<b>AMBER:</b> No evidence available at this time.
	<b>Duty to Co-operate</b>	<b>AMBER:</b> Likely support from KCC and Highways England subject to evidence. Risk inherent in that KCC has stated a clear position in Reg18a responses of not ruling out GS.	<b>GREEN:</b> Likely support from KCC and Highways England subject to evidence.	<b>GREEN:</b> Likely support from KCC and Highways England subject to evidence.	<b>GREEN:</b> Likely support from KCC and Highways England subject to evidence. Implications for cross-boundary infrastructure.
	<b>DM Input</b>	<b>GREEN:</b> No significant issues.	<b>GREEN:</b> No significant issues.	<b>GREEN:</b> No significant issues.	<b>GREEN:</b> No significant issues.

	<b>Deliverability</b>	<b>GREEN:</b> Technically viable, no evidence.	<b>AMBER:</b> Significant constraints known, and opportunities known. Would require significant development to fund LLRR.	<b>GREEN:</b> Proven methodology, least expensive approach with minimal land requirements and budget implications. Long-term benefits.	<b>GREEN:</b> Requires evidencing but is technically viable.
	<b>Plan Period Implications</b>	<b>GREEN:</b> None significant.	<b>AMBER:</b> LLRR will take considerable time. Major road infrastructure takes a considerable length of time to deliver and the benefits materialise only on full completion.	<b>GREEN:</b> None significant.	<b>AMBER:</b> GSs will take considerable time to deliver, most likely extending beyond the plan period.
	<b>Tests of Soundness</b>	<b>GREEN:</b> Found sound under LP17.	<b>AMBER:</b> Yes, but question mark over deliverability of LLRR.	<b>GREEN:</b> Yes.	<b>GREEN:</b> Yes.
<b>Potential Objective for topic area</b>	<b>GREEN:</b> Can be accommodated in new Objectives.	<b>GREEN:</b> Can be accommodated in new Objectives.	<b>GREEN:</b> Can be accommodated in new Objectives.	<b>GREEN:</b> Can be accommodated in new Objectives.	
<b>SUSTAINABILTY APPRAISAL</b>	N/A	N/A	N/A	N/A	
<b>What Mitigations are required incl. infrastructure and design?</b>	N/A	N/A	N/A	N/A	
<b>Is the approach Reasonable?</b>	N/A	N/A	N/A	N/A	