

Mr Robert Mellor
c/o Ms Louise St John Howe
Programme Officer
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Our Ref: PL/JSL/10560

27th January 2017

Dear Mr Mellor,

MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION: LAND AT BOUGHTON LANE

I am writing to you on behalf of my clients, BDW Trading Ltd and Persimmon Homes, in respect to Sites H1(29) Land at New Line Learning, Boughton Lane, Maidstone and H1(53) Land at Boughton Lane, Boughton Monchelsea and Loose.

In your Interim Findings from the Examination of the Maidstone Borough Local Plan, published on 22nd December 2016, you recommend that the above sites should be removed from the Plan, on the basis that: "...adequate mitigation measures for the impact on the A229 have not been demonstrated". In so doing, you refer to the refused planning application for 220 dwellings on Site H1(29) and the subsequently dismissed appeal, in which the Inspector concluded that the development would have a severe residual impact on the local highway network in terms of congestion. As you acknowledge, that decision was later quashed, and the appeal is to be re-determined in due course. Furthermore, the Local Highway Authority – Kent County Council (KCC) – neither objected to the original planning application nor gave evidence at the Appeal Inquiry.

We would note that DHA Transport submitted representations to the Local Plan Examination on behalf of BDW Trading Ltd in respect to Session 6B – Larger Villages Housing Development – (Reference: R19515) and gave evidence in person. Our written and oral evidence directly addressed the questions you raised in respect to the appeal outcome and the deliverability of highway mitigation measures at the Wheatsheaf junction (A229 Loose Road / A274 Sutton Road) and the Swan junction (A229 Loose Road / Boughton Lane / Cripple Street). We set out in detail the scheme of mitigation that we have developed for the Swan junction to inform the fresh appeal and how this differs from the scheme identified by Mott MacDonald on behalf of Maidstone Borough Council (MBC). We demonstrated, moreover, using industry-standard junction capacity modelling software, that this scheme would fully mitigate the committed and allocated development deriving access from the A229 Loose Road corridor, including Sites H1(29) and H1(53). We also set out how the

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applicants would address other matters relating to Boughton Lane itself, road safety and pedestrian and cycle connectivity.

The DHA mitigation scheme is not referred to in your Interim Findings from the Examination. You simply state at Paragraph 64 that:- *"A scheme to alter The Swan junction has also been investigated as a means of improving its capacity... The Kent County Council as Highway Authority now objects to the proposed allocation (Site H1(29)) on the basis that the mitigation would not be sufficient to avoid a severe impact and it has particular safety concerns about the proposed Swan junction improvements"*. We can only assume that you are referring to the Mott MacDonald scheme in this regard, as we have not yet engaged in detailed dialogue with KCC in respect to our scheme.

With respect to the Wheatsheaf junction, you note at Paragraph 64 of your Interim Findings that KCC's proposal to enhance the capacity of this junction by restricting access from Cranborne Avenue was rejected by the Maidstone Joint Transportation Board (JTB) in response to objections from local residents. You go on to state that:- *"The alternatives would require land acquisition, road widening and the relocation of services which... have not been agreed"*. Here again, no reference is made to our representations to Session 6B of the Local Plan Examination, in which we outlined two alternative mitigation options for the Wheatsheaf junction which do not require physical changes to the junction layout; specifically:-

- The implementation of 'Puffin' / 'Phase Delay' technology and the full implementation of the SCOOT control system currently used elsewhere in Maidstone; and
- The achievement of mode shift arising from the investment in alternative and sustainable transport measures provided for in the submitted Local Plan and Integrated Transport Strategy. It should be noted in this respect that MBC and KCC have previously assented to a mode shift target of 6% in their strategic VISUM traffic modelling and that Mott MacDonald have subsequently demonstrated that mode shift of just 3% would be adequate, in combination with the above technological enhancements, to mitigate the effects of Local Plan growth upon the junction.

Our previous representations explain how capacity improvements to the Wheatsheaf junction would also address congestion at the Swan junction by alleviating the traffic queues that currently 'block back' and affect its performance.

On a wider point, you will be aware that a Statement of Common Ground (SoCG) between KCC Highways and Transportation (KCC H&T) and MBC was issued for the purposes of the Local Plan Examination in September 2016. 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 JTB at its meetings on 7th December 2015 and 13th July 2016. The Statement confirms the agreement of both authorities that these schemes will adequately mitigate Local Plan growth up to 2022; a position that was reiterated by KCC's Head of Transportation at the Transport Modelling Seminar informing the Local Plan Examination on 6th October 2016.



The highway improvements schemes identified in the SoCG for South and 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.

It is therefore apparent that there is agreement between KCC H&T and MBC that the impact of Local Plan growth in this part of the urban area (which will be substantially complete by 2022) can be adequately mitigated and that this mitigation is deliverable in the short-term. Indeed, it has recently come to our attention that KCC H&T's transport planning consultants, Amey, have already prepared feasibility designs for a proposed scheme of capacity enhancements to the Wheatsheaf junction, for which Member approval will shortly be sought.

In summary, it is clear that there are feasible schemes to adequately mitigate the effects of all Local Plan development, including Sites H1(29) and H1(53), on the A229 corridor to the south of Maidstone Town Centre. On this basis, we would respectfully request that you review and reconsider your Interim Findings in respect to these sites.

Should you require any further information or clarification on the contents of this letter or its enclosures, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jason Lewis', written in a cursive style.

Jason Lewis
Director

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Enc. Examination Reference: R19515 – BDW Trading Ltd Response to Inspector's Session 6B Questions: Larger Villages