

AGENDA

STRATEGIC PLANNING, SUSTAINABILITY AND TRANSPORTATION COMMITTEE MEETING



Date: Tuesday 14 June 2016
Time: 6.30 pm
Venue: Town Hall, High Street,
Maidstone

Membership:

Councillors Burton (Chairman), English,
Mrs Grigg, D Mortimer, Munford,
Prendergast, Springett,
de Wiggondene and Wilby

Page No.

1. Apologies for Absence
2. Notification of Substitute Members
3. Urgent Items

Continued Over/:

Issued on Monday 6 June 2016

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**Alison Broom, Chief Executive, Maidstone Borough Council,
Maidstone House, King Street, Maidstone Kent ME15 6JQ**

4. Notification of Visiting Members
5. Disclosures by Members and Officers
6. Disclosures of Lobbying
7. To consider whether any items should be taken in private because of the possible disclosure of exempt information
8. Minutes of the meetings held on 18 April 2016 1 - 9
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10. Presentation of Petitions (if any)
11. Questions and answer session for members of the public
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18. Outside Bodies updates - verbal reports

PUBLIC SPEAKING

In order to book a slot to speak at this meeting of the Strategic Planning, Transportation and Sustainability Committee, please contact Tessa Ware on 01622 602621 or by email at tessaware@maidstone.gov.uk by 5pm one clear working day before the meeting. If asking a question, you will need to provide the full text in writing. If making a statement, you will need to tell us which agenda item you wish to speak on. Please note that slots will be allocated on a first come first served basis.

MAIDSTONE BOROUGH COUNCIL

Strategic Planning, Sustainability and Transportation Committee

MINUTES OF THE MEETING HELD ON MONDAY 18 APRIL 2016

Present: Councillor Burton (Chairman), and
Councillors English, Mrs Gooch, Mrs Grigg, D
Mortimer, Paine, Springett, Mrs Stockell and Mrs
Wilson.

Also Present: Councillors Brice, Butler, Chittenden,
Clark, Greer, Perry, J Sams and Willis

20. APOLOGIES FOR ABSENCE

Apologies were received from Councillor De Wiggondene.

21. NOTIFICATION OF SUBSTITUTE MEMBERS

It was noted that Councillor Stockell was in attendance as substitute for Councillor De Wiggodene.

22. URGENT ITEMS

The Chairman pointed out the Amended Agenda which had been circulated earlier to include Item 13, a report on the Neighbourhood Plan Process revising the protocol and internal decision making framework for neighbourhood planning.

The Chairman stated that, in his opinion, the Urgent Update dated 18 April 2016, should be taken as an urgent item as it contained further information relating to agenda item 11.

23. NOTIFICATION OF VISITING MEMBERS

It was noted that the following Councillors were in attendance for the items indicated:

Councillor Brice – item 11
Councillor Butler – observing
Councillor Chittenden – item 11
Councillor Clark – item 11
Councillor Greer – observing
Councillor Perry – items 12 and 13
Councillor J Sams – item 11
Councillor Willis – observing

24. DISCLOSURES BY MEMBERS AND OFFICERS

There were no disclosures by Members or Officers.

25. DISCLOSURES OF LOBBYING

It was noted that all members had been lobbied on item 11.

26. TO CONSIDER WHETHER ANY ITEMS SHOULD BE TAKEN IN PRIVATE BECAUSE OF THE POSSIBLE DISCLOSURE OF EXEMPT INFORMATION

The Chairman stated that it may be necessary to move into Part II depending on how the discussion went for agenda item 11 and 12 on the agenda due to the possible disclosure of exempt information having applied the public interested test.

27. MINUTES OF THE MEETING HELD ON 8 MARCH 2016

RESOLVED:

That the minutes of the meeting held on 8 March 2016 be approved as a correct record and signed by the Chairman subject to the inclusion of:

- The words "and the very basic level of consultation" to paragraph 3 of minute 13; and,
- The inclusion of the South Maidstone Action for Roads and Transport to be included in the list at point 4 of the resolution under minute 17.

28. PRESENTATION OF PETITIONS (IF ANY)

There were no petitions.

29. QUESTIONS AND ANSWER SESSION FOR MEMBERS OF THE PUBLIC

Mr Sean Carter asked the Chairman the following question:

"The North Loose Residents Association note that some changes have been made to the MBC Local Plan regarding the New Line Learning site in Boughton Lane. As Kent Highways are objecting to the Local Plan regarding traffic on the A229, and state that there are no mitigation measures available at the Boughton Lane/Cripple Street/Loose Road junction, which is already at capacity, or at the Wheatsheaf. As the MBC Planning Committee originally rejected the original planning application and now a Planning Inspector, backed by the Secretary of State describes it as having a "severe adverse effect" and in the Inspectors words "the situation in Boughton Lane would be likely to come close to being intolerable" surely all Boughton Lane allocations should be withdrawn from the Local Plan, or do Maidstone Borough Council no longer listen to the experts or the views of the residents of South Maidstone."

The Chairman's response:

"As you are aware, by significant majority of full Council, the decision to submit the Local Plan to the Inspector has already been taken. It is for the appointed Inspector to consider and recommend changes to the Local Plan if considered appropriate to do so. In any event, the recommendation of the appeal inspector/decision of the Secretary of State on the New Line Learning appeal was based on the fact that there was no currently identified scheme of mitigation. The appeal was not dismissed on the grounds that a suitable mitigation scheme could not yet be found."

Supplementary question from Mr Carter:

"As Maidstone Borough Council are determined to build 18,560 houses does this mean that the MBC Planning Committee will just be rubber stamping all future planning applications which are in the allocated sites or can we be assured that each planning application will be considered on its own individual merits even if a refusal reduces the overall housing numbers?"

The Chairman's response:

"Yes, I think quite simply we could give you that assurance. Each application is judged upon its merits. If, for example, the case you just mentioned, a further application was submitted that was still not considered suitable, the same process would apply. The Planning Committee determine each application on its own individual merits."

Mrs Cheryl Taylor-Maggio asked the Chairman the following question:

"Given that the draft Local Plan is about to be submitted to the Inspector, is it worth Parishes putting any effort into new Neighbourhood Plans?"

The Chairman's response:

"It is a decision for each individual parish council or neighbourhood forum whether it considers there is merit in preparing a neighbourhood plan for its area. A neighbourhood plan is an important tool for any community which is keen to plan positively for new development and to shape the details of that development. A neighbourhood plan is not a tool for resisting new development; those plans which object to the content of the emerging Local Plan, and who have made representations at the Regulation 19 stage, will have the opportunity to make their case for changes to the Local Plan at the Local Plan Examination."

Supplementary question from Mrs Taylor Maggio

"Does that mean that the Local Plan, even when adopted, would then be varied to give effect to the number and locations of housing and traveller pitches in a future neighbourhood plan provided it is compatible with the strategic, but not those detailed requirements of the local plan?"

The Chairman's response:

"If I follow your question accurately, again, I think the answer is yes."

Mr Peter Coulling asked the Chairman the following question:

"Is the Local Plan, as it stands at the moment, compatible with all approved or emerging Neighbourhood Plans?"

The Chairman's response:

"Account has been taken of the 'made' and emerging neighbourhood plans as the Local Plan has been prepared and in considering proposed changes to the Local Plan as set out in the report which is before the Committee this evening. This point is reaffirmed in the Urgent Update.

It is not the case that the emerging Local Plan aligns with all emerging neighbourhood plans. Indeed, it would be impossible for it to do so as the neighbourhood plans are themselves in the process of being prepared and will be subject to change.

Generally, the emerging neighbourhood plans provide for less new housing than the emerging Local Plan. There is one 'made' neighbourhood plan which is the North Loose Neighbourhood Development Plan, which includes no housing site allocations. In the face of the NPPF requirement to meet the full objectively assessed need for housing, the Council has made some difficult decisions about where to allocate new development. This has been done in the knowledge that having an up to date Local Plan which secures a 5 year housing land supply will put the Council in the strongest position to resist development on unsuitable sites".

Supplementary question from Mr Coulling:

"In that case, would each relevant parish agree that substantially the detailed number of locations of housing and traveller pitches in its neighbourhood plan have been taken as the definition of those elements of the Local Plan for their parish or is there a wide variation?"

The Chairman's response:

"I don't know off the top of my head the individual comparison to be able to give you an accurate answer. I will find an answer for you and give that to you in writing."

Ms Geraldine Brown asked the Chairman the following question:

"Would you agree with the sentiments expressed by some Members at last Wednesday's Council meeting that, in effect, the views of our MPs on the Local Plan should carry little or no weight, because they have not got relevant planning experience and have insufficient informed focus on local issues, rather than national issues?"

The Chairman's response:

"I would not know what relevant planning knowledge MPs have, so I cannot comment. For the avoidance of any doubt, the Local Plan was agreed for submission by the Council on 25th January. The Local Plan will be submitted in May, as will all the 'duly made' representations which were received at Regulation 19 stage. It will be for the Inspector to decide what importance to give the matters raised in the individual representations."

Supplementary question from Ms Brown:

"Bearing in mind that our two MPs were at a public meeting recently and bearing in mind the comments that were made by some of the Council Members at the meeting, do you think that Maidstone Borough Council should respond to the MPs with the concerns that constraints should be applied, that there seems to be a gap between what the MPs are saying and what the Members are saying, and should there be more correspondence between them?"

The Chairman's response:

"I'm certainly aware that there is, in actual fact, correspondence. I suspect that the gap is actually between what the NPPF requires us to do, what MPs who pass the legislation think and the reality at the very sharp end as the district planning authority and your elected members locally have to bring forward."

30. REPORT OF THE HEAD OF PLANNING AND DEVELOPMENT - MAIDSTONE BOROUGH LOCAL PLAN: MAIN OUTCOMES OF THE REGULATION 19 CONSULTATION AND PROPOSED CHANGES

The Head of Planning and Development introduced the report and explained the suggested changes resulting from the Regulation 19 consultation were attached as Appendix A to the report. These changes, once agreed, would be submitted with the Local Plan to the Secretary of State for independent examination.

The Committee were informed that Highways England had objected to the Local Plan. A meeting was held on 12 April 2016 between Maidstone Borough Council, Kent County Council (KCC) and Highways England. Highways England had significant concerns regarding the adequacy of the VISUM modelling on the motorway network. However, it had been agreed that micro assimilation work on the four main junctions of the M20 in the Maidstone borough would be carried out as a way forward.

Councillors Chittenden, Clark, Sams and Brice addressed the Committee as visiting members.

In response to concerns raised by visiting Members the Head of Planning and Development explained that detailed master planning was being

undertaken regarding Lenham, with Lenham Parish Council and other stakeholders in the area being involved. He explained there was still an opportunity to shape the housing layouts and accesses etc.

He went on to state he was unaware of the Marley site in Lenham coming forward as land available for housing. In the adopted Local Plan this site was allocated as protected employment land, however, this could change.

Regarding land south of the railway line in Lenham, the Head of Planning and Development went on to say, this was possible, but other settlements, such as Marden and Staplehurst for example, would have to be taken into account. He stated the line, in terms of where growth should stop, had to be drawn somewhere. The site mentioned by the visiting Member was a brownfield site which was considered the exception to the rule.

With reference to the Housing and Planning Bill, the Head of Planning and Development explained it would become an important and material consideration in the Local Plan. Depending on the time it became an Act, it was likely to be before the Inspector at the examination stage of the Local Plan. Until that time the detail was unavailable.

The Principal Planning Officer (Spatial Planning) confirmed that legal advice had been taken throughout the Local Plan preparation process.

She went on to explain that the Gypsy and Traveller Accommodation Assessment (GTAA) was an assessment of the need for sites in the Borough. Changes in the guidance for the provision of Gypsy and Traveller sites, strictly limiting sites to the countryside, related to how that need was met and the GTAA and planning guidance were two distinct and separate things.

Concern was raised regarding the redrawing of urban boundaries and the possible conflict between Policy DM12 and the individual site policies and which policy would take precedence when making planning decisions on the density of developments. It was explained that the site policies would take precedence. It was agreed to keep the urban boundary as it was and withdraw the proposed modifications set out in Appendix A of the report.

The Committee were informed, regarding the broad location policies, if a neighbourhood plan was adopted after the adoption of the Local Plan, the neighbourhood plan policies would take precedence over the Local Plan policies provided the neighbourhood plan was in general conformity with the Local Plan.

A question was raised regarding the removal of Policy ID1(4) Infrastructure Delivery rankings, where there were competing demands for contributions towards the delivery of infrastructure through section 106 agreements due to a lack of evidence to justify the policy. It was agreed this policy should remain in the Local Plan and the necessary evidence gathered to support it should go before the Inspector.

It was confirmed, regarding site H1(29), land at Boughton lane, that should a planning application come forward that did not provide adequate mitigation to protect the ancient woodland on the site and provide for changes to the junction at the Wheatsheaf, it would be unlikely to be granted planning permission. It was also confirmed that the site criteria for site EMP1(5), Woodcut Farm, was very stringent and if a planning application came forward showing larger buildings than in the policy, it would be refused. The Council was not required to support the Regulation 19 consultation feedback received regarding increasing the height of the buildings on this site.

The Head of Planning and Development confirmed the evidence base to show the Council had fulfilled its duty to co-operate with KCC was robust.

The Committee noted the guidance given in relation to Lenham and broad locations.

RESOLVED:

That the Schedule of Proposed Changes to the Maidstone Borough Local Plan set out in Appendix A of the report to the Committee dated 18 April 2016 be agreed for submission to the Secretary of State for Communities and Local Government with the Maidstone Local Plan 2016 which was agreed by Council on 25 January 2016 with the:

- Exclusion from the Schedule the boundary modification reference PC/5, Policy SP1 Maidstone Urban Area, shown on page 46 of the agenda;
- Exclusion from the Schedule of the Proposed Change PC/57, Policy ID1 Infrastructure Delivery; and,
- The inclusion in the Schedule of the additional and amended Proposed Changes shown on the Urgent Update dated 18 April 2016 regarding polices:
 - H1(5) – Langley Park, Sutton Road
 - H2(2) – Invicta Park
 - H2(3) – Lenham
 - EMP(1) – Mote Road, Maidstone

Voting: For – 7 Against – 0 Abstentions – 2

31. REPORT OF THE HEAD OF PLANNING AND DEVELOPMENT - INFRASTRUCTURE DELIVERY PLAN (APRIL 2016)

The Principal Planning Officer introduced his report on the Infrastructure Delivery Plan (IDP) for the Committee to consider its submission to the Secretary of State for Communities and Local Government as supporting evidence for the Maidstone Borough Local Plan. The Committee were also asked to consider giving delegated authority to the Head of Planning and Development to update the Infrastructure Delivery Plan prior to submission, recognising that it was a 'living document'.

The Committee approved the updated version of the IDP to be published as supporting evidence to the Local Plan at their meeting of 13 January 2016. The IDP had been further updated and the Committee were reminded that the IDP was a key evidence base document and infrastructure planning tool which would support the examination and implementation of the Local Plan.

Councillor Perry and Councillor Brice addressed the Committee as visiting Members.

The Head of Planning and Development confirmed that work was being carried out to try and find a solution to improve the key junction of the A229, Headcorn Road, Station Road and Marden Road which would need to pass the Stage 1 and 2 Safety Audit. However, solutions were constrained to the highway due to land ownership. It was confirmed that officers were pursuing discussions with Kent County Council (KCC), as the highways authority, the use of compulsory purchasing of land to facilitate junction improvements in the Local Plan.

It was confirmed that Southern Water had maintained their position throughout the Local Plan process, that provided current situations were not exacerbated and mitigation was put in place, as a minimum, through the planning process, they would not object to new developments.

Highways concerns raised regarding highway improvements in Headcorn were noted.

Concern was raised regarding the 'risk to delivery' of the Provision of Open Space (GB25 page 146 of the agenda) showing as 'high' and how this may be perceived by the Inspector. It was agreed this would be changed to 'moderate'.

Concern was also raised regarding the sources of income for infrastructure delivery just showing as Section 106 or the Community Infrastructure Levy (CIL). There was no mention of other sources of income such as New Homes Bonus, Local Enterprise Partnership funding etc. The Committee were informed that more information on the CIL would come back to Committee at a later date. It was requested that the Committee be fully involved with the changes made to the IDP.

It was noted that a future amendment would include further provision of waste disposal facilities in liaison with Kent County Council.

RESOLVED:

1. That the Infrastructure Delivery Plan be approved for submission to the Secretary of State for Communities and Local Government as supporting evidence to the Maidstone Borough Local Plan with 'risk to delivery' for item reference GB25, Provision of Open Space, amended to 'moderate'.

2. That delegated authority be given to the Head of Planning and Development to update the Infrastructure Delivery Plan prior to submission, recognising it is a 'living document' and reporting back to this Committee at the earliest opportunity on the changes made.

Voting: For – 9 Against – 0 Abstentions – 0

32. REPORT OF THE HEAD OF PLANNING AND DEVELOPMENT - NEIGHBOURHOOD PLANNING PROCESS

The Local Plan Project manager presented the report and explained the purpose of the report.

The existing Neighbourhood Plan process was updated and agreed by this Committee at an earlier meeting. A number of neighbourhood plans had gone through the process and had highlighted issues with the process.

The Housing and Planning Bill was receiving its final reading and the existing Neighbourhood Plan process would not fit with the new regulatory timetable outlined in the mandate from central Government.

The Committee heard it was difficult to apply timescales to the process as each neighbourhood plan was different and would present different issues at different points of the process.

RESOLVED:

That the revised protocol for Neighbourhood Planning set out in Appendix A of the Urgent report to the Committee dated 18 April 2016, notably in regard to the revised decision making arrangements at Regulation 18 of the Neighbourhood Planning (General) Regulations 2012 be approved.

Voting: For – 9 Against – 0 Abstentions – 0

33. DURATION OF MEETING

6:30pm to 8:40pm

Agenda Item 9

MAIDSTONE BOROUGH COUNCIL

Strategic Planning, Sustainability and Transportation Committee

MINUTES OF THE MEETING HELD ON TUESDAY 24 MAY 2016

Present: Councillor Burton (Chairman), and Councillors English, Mrs Grigg, D Mortimer, Prendergast, Mrs Ring, Springett and Wilby

Also Present: Councillors Mrs Blackmore, Brice, Cox, Daley, Ells, Fissenden, Fort, Garland, Mrs Gooch, Harwood, Mrs Hinder, Joy, Naghi, Newton, Perry, Pickett, Mrs Robertson, Round, Mrs Stockell, Vizzard, Webb, Webster and Mrs Wilson

1. APOLOGIES FOR ABSENCE

Apologies were received from Councillor de Wiggondene.

2. NOTIFICATION OF SUBSTITUTE MEMBERS

It was noted that Councillor Ring was present as a Substitute for Councillor de Wiggondene.

3. NOTIFICATION OF VISITING MEMBERS

The following Councillor were in attendance as Visiting Members:

Councillor Blackmore, Councillor Boughton, Councillor Brice, Councillor M Burton, Councillor Cox, Councillor Daley, Councillor Ells, Councillor Fermor, Councillor Fissenden, Councillor Fort, Councillor Garland, Councillor Garten, Councillor Gooch, Councillor Harvey, Councillor Harwood, Councillor Hinder, Councillor Joy, Councillor Naghi, Councillor Newton, Councillor Perry, Councillor Pickett, Councillor Revell, Councillor Robertson, Councillor Round, Councillor Stockell, Councillor Vizzard, Councillor Webb, Councillor Webster, Councillor Wilby and Councillor Wilson

4. ELECTION OF CHAIRMAN

RESOLVED: That Councillor Burton be elected as the Chairman for the Municipal Year 2016-17.

5. ELECTION OF VICE-CHAIRMAN

RESOLVED: That Councillor Grigg be elected as the Vice-Chairman for the Municipal Year 2016-17.

6. DURATION OF MEETING

6:45pm to 6:47pm

Agenda Item 12

Strategic Planning, Sustainability & Transportation Committee

14 June 2016

Is the final decision on the recommendations in this report to be made at this meeting?

Yes

Consideration of responses to the consultation on the draft Integrated Transport Strategy

Final Decision-Maker	Strategic Planning, Sustainability & Transportation Committee
Lead Head of Service	Rob Jarman: Head of Planning & Development
Lead Officer and Report Author	Steve Clarke: Principal Planning Officer Spatial Policy
Classification	Public
Wards affected	All

This report makes the following recommendations to this Committee:

1. Councillors approve the schedule of issues and responses to the consultation on the Integrated Transport Strategy as set out at Appendix One
2. Councillors agree that revised versions of the Integrated Transport Strategy and a separate Walking and Cycling Strategy be prepared and reported to a future meeting of the Maidstone Joint Transportation Board recommending that the relevant KCC Cabinet Member and this Committee approve the documents and;
3. Following the meeting of the Maidstone JTB the 'final' versions of the document and then reported to this Committee to approve the documents for publication.

This report relates to the following corporate priorities:

- Keeping Maidstone Borough an attractive place for all
- Securing a successful economy for Maidstone Borough

The Integrated Transport Strategy plays a key role in delivering a package of sustainable transport measures in support of the allocations set out in the Maidstone Borough Local Plan and the need to mitigate the transport impact of planned development and deliver modal shift away from reliance on the use of the private car with other potential benefits such as improved public transport networks and improved air quality.

Timetable

Meeting	Date
Strategic Planning, Sustainability & Transportation Committee	14 June 2016

Consideration of responses to the consultation on the draft Integrated Transport Strategy

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 This report considers the responses to the consultation on the draft Integrated Transport Strategy (ITS) that took place between 5 February 2016 and 18 March 2016.
 - 1.2 It sets out the issues raised and considers the proposed response to the issues raised and as appropriate, recommends changes to the ITS document, which will be incorporated into an updated version which will be reported to this Committee and the Maidstone Joint Transportation Board before final publication.
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2. INTRODUCTION AND BACKGROUND

- 2.1 Section 80 of the Local Transport Act 2008 gives local authorities, acting jointly, the power to review the effectiveness and efficiency of transport within their area and to propose their own arrangements to support more coherent planning and delivery of local transport. Kent County Council and Maidstone Borough Council cooperated to prepare a document for public consultation for local transport provision in 2012.
- 2.2 The Maidstone Integrated Transport Strategy was first published for public consultation in August 2012. It aimed to set out the future for transport in Maidstone until 2026 and described the policy context, the existing transport networks and the challenges they face. Objectives for transport provision were identified and an action plan proposed to address the requirements for the new development proposed by the Maidstone Core Strategy at that stage.
- 2.3 Following public consultation and as a result of the publication of the NPPF in March 2012, the Borough Council decided to proceed with the preparation of a Local Plan to replace the Core Strategy and this necessitated a major review of supporting documents and policies.
- 2.4 A revised draft ITS was prepared to inform and guide transport policies and proposals in the emerging Maidstone Borough Local Plan which was submitted for examination on 20 May 2016. The Strategy was considered by this Committee and the Maidstone Joint Transportation Board, prior to public consultation which, as indicated above, took place between 5 February 2016 and 18 March 2016.
- 2.5 Some 83 representations were received during the consultation period together with one late representation from the British Horse Society following confusion over the appropriate e-mail address to which responses should be sent. The issues raised and officer responses are attached at Appendix One to the report.

3. AVAILABLE OPTIONS

- 3.1 Councillors could choose not to consider the responses to the consultation or suggested changes to the ITS or not agree the recommended changes. The resulting outcome would in effect be a decision to not proceed to publish a final version of the ITS. If this was the case, there would not be a supporting document to the Maidstone Borough Local Plan setting out the Council's approach to sustainable transport interventions providing appropriate mitigation in support of and as part of the evidence base for the allocations in the Local Plan.
- 3.2 Councillors could note the representations/issues and responses but choose to accept some but not all of the consequentially recommended changes.
- 3.3 The final option is for Councillors to consider the representations and the recommended changes to the ITS and to agree them. This will ensure that the ITS is sufficiently robust and that it provides strong supporting evidence of appropriate mitigation and sustainable transport interventions in support of the Maidstone Borough Local Plan.

4. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS

- 4.1 The final option set out in paragraph 3.3 above is the one recommended to Councillors as this will ensure that the ITS and the cycling and walking strategy are robust and will assist in the delivery of appropriate mitigation and sustainable transport measures and improvements in support of the allocations in the Maidstone Borough Local Plan.
- 4.2 As indicated above, a total of 83 representations were received to the consultation. The representations ranged from general ones on the thrust and content of the strategy, issues relating to development in South East Maidstone in particular and in support of Kent County Council's published views on the ITS, to more detailed comments relating to specific settlements or measures proposed in the Strategy or outlining proposed alternative interventions.
- 4.3 One key issue arising from the consultation and further discussions with the County Council is the need to separate the Walking and Cycling Strategy from the ITS. This is agreed. When the revised version of the ITS is reported to this Committee and the Maidstone JTB for approval the two documents will be separated.
- 4.4 The main representations in the draft ITS can be grouped into a number of main areas as follows:
 - SE Maidstone
 - Impact on Rural Service Centres
 - Park and Ride
 - Public Transport (Buses)
 - Public Transport (Rail)

- Highway schemes and Capacity Improvements
- Parking
- Strategic Road Network
- Environmental issues
- Content of the ITS
- General issues
- Walking and cycling strategy specific measures

4.5 The greatest number of representations related to the planned development in the Local Plan in SE Maidstone in particular and the potential negative impact of development on the local highway network in Maidstone as a whole in support of the County Council's public stance on the issues. Highways England have also responded regarding the potential impact on the Strategic Road Network (SRN).

4.6 KCC commented on the Draft Integrated Transport Strategy in summary in relation to the ITS they stated:-

1. That the draft ITS is based on transport improvements which have not been agreed by the Local Highway Authority (i.e. KCC);
2. The draft ITS does not provide an acceptable means of mitigating the impact of planned growth in housing and employment and will result in a severe impact on parts of the highway network , most notably on the A229 and A274 in south and south east Maidstone;
3. The draft ITS and Local Plan 'do not reflect the resolution of the Maidstone JTB on 7 December 2015' in that a transport strategy up until 2022 needed to be taken forward first so that it would be reviewed simultaneously with the Local Plan by 2022 'once work on developing the justification for a Leeds Langley Relief Road has been completed';
4. The document does not positively contribute 'to the delivery of genuinely sustainable development that reflects the vision and aspiration of local communities' across the Borough.

4.7 In response:

1. Engagement continues with KCC in terms of agreeing areas of common ground around mitigation and having a comprehensive understanding of the assumptions behind the VISUM modelling etc. At a strategic level, it is understood the 'solution' to the traffic problems is a relief road. This may be the case and to support this, there is positive signposting within both the draft ITS and the Local Plan.

However, the relief road, as yet, cannot be included in policy because there is insufficient evidence and justification. To date there has been no sustainability appraisal, cost/benefit analysis, route option testing or consultation with key stakeholders including crucially, Highways England. This could well be completed in time for a Local Plan Review. In conclusion 'signposting' as per the submitted Local Plan and the draft ITS is the most that can be done because KCC has not evidenced that the relief road is necessary within the plan period.

Based on detailed modelling and mitigation work undertaken by Mott MacDonald together with a whole host of transport assessments accompanying planning applications, it is considered that the housing

allocations, subject to the accompanying mitigation, would not result in severe cumulative congestion. This is also the case for the rest of the Borough. Work continues on detailed highways modelling and mitigation together with engagement with KCC and Highways England.

2. As stated above, engagement continues with KCC. It has been understood that agreement in terms of broad principles relating to priority junction improvements and to the relief road had been agreed at the December 2015 JTB. Although this is an advisory Board, this was translated into the Submitted Local Plan and the draft ITS. Talks are ongoing to resolve specific points of contention.

3. It is unclear as to why the mitigation put forward in both the ITS and the Local Plan is considered to be unacceptable. As previously stated, it was understood that there was much common ground emanating from the December 2015 JTB decision. The proposed mitigation measures are derived, in part, from the existing adopted Maidstone Borough-wide Local plan and KCC's own Local Transport Plan (LTP3) both of which are still extant.

Lastly, paragraph 32 of the NPPF, sets out a sequential approach to development that generates significant amounts of movement. A safe and suitable site access is a detailed development management matter but we seek (in the ITS and Local Plan) to provide:-

- 'The opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure' and that
- 'Improvements can be undertaken within the transport network that cost-effectively limit the significant impacts of the development'.

By doing so, it is considered that development should not be prevented on transport grounds as the residual cumulative impacts of development are not severe because they can be mitigated. As stated above, engagement is continuing with KCC on resolving these matters. The justification and evidence for a relief road can start now and could be ready in time for a specific delivery policy inclusion as part of a future local plan review. However, it has not been demonstrated that the relief road is necessary and the most appropriate form of highways mitigation.

4. This point is not understood as this authority has devoted mcg resource into solving transport problems and engagement and thus 'positively seeks opportunities to meet the development needs' of Maidstone Borough (NPPF paragraph 14).

4.8 Highways England (HE) made representations objecting to the ITS as well as Policy DM24 of the Local Plan on the grounds that the plan needs amendment to clarify and ensure that developments can be appropriately located to effectively mitigate their impact on the Strategic Road Network (SRN). In addition, HE has also expressed concern that the approach to the assessment of transport impacts that has been undertaken may have underestimated the full impact of the Local Plan on the SRN.

4.9 In response, the Committee is advised that discussions are on-going with HE and that further junction capacity assessment of junctions 5-8 of the

M20 has been scoped in consultation with HE and KCC highways and subsequently commissioned. This work will identify if there is a need for any additional mitigation to the already identified in the ITS and the Local Plan.

- 4.10 Comments on Park and Ride mostly relate to the need for a replacement facility in the north of Maidstone, and also calls for such a facility on the southern approach to Maidstone. In the absence of suitable and available sites for such facilities it is not proposed to make any changes to the ITS.
- 4.11 The comments on Public Transport (Buses) are generally supportive of the measures set out in the ITS. Proposed changes as a result of the comments relate to the need for improvements to evening and weekend services as well as weekday services as part of Action PT6. There is some scepticism that the residents of Rural Service Centres will use any improved services.
- 4.12 Similarly it is proposed to amend the ITS to reflect recent developments relating to the proposed enlarged remit of Transport for London and the forthcoming new South eastern Franchise process to ensure that the Council's stance on these issues and rail services as they affect the Borough and its residents are documented.
- 4.13 Representations calling for a new station on the HS1 railway-line are noted but no changes to the ITS are proposed given the small likelihood of such a facility being provided and also the potential environmental impacts on the Kent Downs AONB it would have. The Council is pushing for an all-day connection to HS1 via the Medway Valley Line as a formal commitment for the new South Eastern Franchise.
- 4.14 Representations on highway schemes and capacity improvements relate to the lack of precise details of what is envisaged in the ITS. These details are set out in the individual Transport Assessments on approved applications and also the additional work that has been carried out for the Council by Mott MacDonald which has been published as part of the evidence base for the Local Plan on the Council's Local Plan examination website. No change to the ITS is proposed as a result.
- 4.15 In terms of other issues it is proposed to review Action PT5 of the ITS to ensure that the needs of the disabled and ageing sections of the population are fully addressed in response to objective 5 of the ITS which is to ensure the need for the transport network to provide equal accessibility to all. The IST/Walking and Cycling Strategy will also be reviewed to ensure that the needs of equestrian users are explicitly considered.
- 4.16 With regard to specific walking and cycling strategy issues, these are to be reviewed in conjunction with KCC's PROW/cycling officers. The proposed alterations/closure/partial closure of North Pole Road Barming to through traffic attracted the most comments with some in support and some against. The proposed review of the representations with KCC officers will also cover the detailed issues raised by the Maidstone Cycling Campaign Forum and whether or not it will be possible/appropriate to include these within the revised strategy. An update following the discussions (which are due to take place prior to the committee meeting), will be given to Councillors at the meeting.

4.17 The ITS and Walking/Cycling Strategy are evolving documents, but substantial progress has been made towards final versions of both. The consideration of the responses to the consultation is a key element of the process and will enable the documents to move forward towards publication. Councillors are therefore recommended to approve the responses to the representations and proposed changes attached at Appendix One.

5. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION

- a. The next step will be to prepare a revised Integrated Transport Strategy together with, (as recommended to Councillors), a separate Walking and Cycling Strategy in the light of the recommended changes set out in the attached schedule and as discussed in this report.
- b. The revised versions of both documents will then be reported to a future meeting of the Maidstone Joint Transportation Board recommending that the relevant KCC Cabinet Member and this Committee approve the documents for final publication.

6. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
Impact on Corporate Priorities	The Integrated Transport Strategy plays a key role in delivering a package of sustainable transport measures in support of the allocations set out in the Maidstone Borough Local Plan and the need to mitigate the transport impact of planned development and deliver modal shift away from reliance on the use of the private car with other potential benefits such as improved public transport networks and improved air quality.	Rob Jarman: Head of Planning & Development
Risk Management	The ITS is part of the evidence base supporting the Maidstone Borough Local Plan, showing a package of sustainable transport alongside other infrastructure interventions in support of the allocations in the	Rob Jarman: Head of Planning & Development

	Local Plan and to support planned growth.	
Financial	No specific financial implications arise from the consideration of this report	Head of Finance & Resources and Finance Team
Staffing	Specialist transport consultants have been engaged to assist in the delivery of the strategy, funded through the existing agreed budget.	Rob Jarman: Head of Planning & Development
Legal	No specific implications arise from the consideration of this report. The ITS has been produced as part of the robust evidence base for the Local Plan	Kate Jardine Team Leader (Planning) Mid Kent Legal Services
Equality Impact Needs Assessment	An ITS that tackles transport challenges through a combination of modes will take into account the needs of all groups including those without access to a car. An alternative strategy reliant in highway improvements will not promote equal access to employment, services and social opportunities and is likely to lead to increased social exclusion amongst lower income groups in particular.	Anna Collier Policy & Information Manager
Environmental/Sustainable Development	The promotion of the ITS to promote sustainable travel where possible will encourage a reduction in single occupancy car travel and in turn a reduction in congestion and carbon emissions relative to a 'do minimum' situation. An alternative strategy reliant solely on highway interventions is likely to generate more traffic than the additional capacity provided increasing carbon congestion	Rob Jarman: Head of Planning & Development
Community Safety	No specific implications arise from the consideration of this report	Rob Jarman: Head of Planning & Development

Human Rights Act	No specific implications arise from the consideration of this report	Rob Jarman: Head of Planning & Development
Procurement	Consultants are used to prepare specialist or technical evidence to support the Local Plan and are appointed in accordance with the Council's procurement procedures	Rob Jarman: Head of Planning & Development & Head of Finance & Resources
Asset Management	No specific implications arise from the consideration of this report	Rob Jarman: Head of Planning & Development

7. REPORT APPENDICES

The following documents are to be published with this report and form part of the report:

- Appendix One: Schedule of issues and responses to the consultation on the Integrated Transport Strategy

Draft Maidstone Integrated Transport Strategy 2011-2031

Schedule of issues and responses following the consultation period 5 February to 18 March 2016

Key issues	Detail	Officer response	Officer Recommendation
SE Maidstone			
<p>1. Roads in SE Maidstone are at capacity. The further development that is planned for this area of Maidstone along the A274/A229 will have a severe and unacceptable impact on the network including many unsuitable local lanes and roads that will be used as rat-runs.</p>	<p>i) Work undertaken by Kent County Council shows the roads in SE Maidstone A229/A274 to be unable to accommodate additional development. The proposed developments would have a severe adverse impact on the highway network, in terms of congestion and inconvenience to local residents and other road users, and on the strategic transport planning of the area generally. This would be contrary to the aims of NPPF paragraph 32.</p>	<p>The results of strategic and localised transport modelling subsequently published demonstrate that following mitigation through highway capacity, public transport and walking/cycling improvements, the residual cumulative traffic impact of the developments cannot be regarded as severe.</p>	<p>Amend section 11 (The Modelling Context) to provide commentary on the results of the most recent modelling.</p>

	<p>ii) KCC has a current policy of opposing development which has a cumulative impact on the Wheatsheaf junction. Major works are needed at the junction along with, ultimately, the Leeds Langley by-pass (agreed cross party at the JTB) to mitigate congestion, without such measures pollution and congestion at this part of Maidstone will become intolerable.</p>	<p>Minor works at the Wheatsheaf identified by KCC, i.e. making Cranbourne Avenue entry only from the junction, would enable an additional 340 vehicles in an hour being able to pass through the junction and mitigate the impact of development currently proposed.</p>	<p>Amend section 11 (The Modelling Context) to provide commentary on the results of the most recent modelling.</p>
	<p>Fully support the inclusion of the schemes supported by the South Maidstone Action for Roads and Traffic (SMART) group at the A229 junction with Sheals Crescent and the adjustment of the A229 / Armstrong Road junction to allow A229 vehicles travelling south to use a third lane for turning (using the unused northbound lane after the lights). I also support the creation of a partial lay-by for the bus stop at the Swan pub to allow traffic to pass and the relocation of several stops on the A229 to allow better traffic flows near the Armstrong Road and Wheatsheaf traffic lights.</p>	<p>Support for SMART proposals noted.</p>	<p>No change</p>
	<p>iii) There will be an unacceptable impact on Gore Court Road and Otham Street/Otham Lane from the traffic associated with the all the new houses in SE Maidstone. There will be no space for walkers and cyclists or horse riders.</p>	<p>Walking & Cycling Strategy actions SEM4, 5 and 6 outline the measures proposed to create high quality routes for non-car users to, from and within the SE Maidstone housing sites. Further details are provided in the Transport Assessments/Travel Plans supporting the individual planning applications, and will be subject to agreement with KCC.</p>	<p>No change</p>

<p>2. The ITS fails to support the volume of vehicular traffic that will be generated by the development proposed in the Local Plan.</p>	<p>The ITS fails to support the volume of vehicular traffic that will be generated by the development proposed in the Local Plan. Late delivery of proposed traffic schemes already appears to be most likely, with the attendant issues that will cause.</p>	<p>The results of strategic and localised transport modelling subsequently published demonstrate that following mitigation through highway capacity, public transport and walking/cycling improvements, the residual cumulative traffic impact of the developments cannot be regarded as severe.</p>	<p>Amend section 11 (The Modelling Context) to provide commentary on the results of the most recent modelling.</p>
<p>3. The appeal decision by the Secretary of State for the New Line Learning site in Boughton Lane indicates that the road network is severely congested with no apparent mitigation.</p>	<p>This appeal decision indicates that conditions on the A229 ('Swan'/Cripple Street) and at the Wheatsheaf junction are already severe and that as no scheme of mitigation had been identified traffic for the proposed development will only make an existing bad situation worse.</p>	<p>The appeal decision has now been quashed in the High Court.</p> <p>However, work commissioned by the Council relating to the Boughton Lane/ A229 / Cripple Street junction demonstrates that mitigation can be undertaken and capacity improved.</p> <p>Work is on-going in conjunction with the County Council relating to the A229/A274 Wheatsheaf Junction to identify and secure mitigation and capacity improvements.</p>	<p>No change</p>
<p>4 Leeds Langley By pass</p>	<p>i) This road is clearly much needed and should be built now as a priority to assist in the mitigation of traffic growth.</p>	<p>The published outputs from the Maidstone VISUM model suggest that the reassignment of traffic from the urban area with the road in place is limited and that the beneficial impacts of the proposed road upon congestion have not been conclusively demonstrated.</p> <p>As a very high cost intervention, the</p>	<p>No change</p>

		<p>justification for this road depends on enabling development in the vicinity of its route. No evidence is available at the time of writing to indicate the extent of enabling development which would be required to support the proposed road, or the feasibility and desirability of this development.</p> <p>Furthermore, given the need for a detailed route assessment, environmental impact assessment, sustainability appraisal and a more detailed analysis of costs and benefits in general, this scheme would require delivery over a longer timescale.</p> <p>The Council is nevertheless willing to work with KCC to progress this scheme once sufficient evidence has been assembled to prove that it is viable.</p>	
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	<p>ii) The evidence within the wider DITS shows that for the current draft of the Local Plan, the Leeds-Langley Bypass is not necessary to meet the overall Objectively Assessed Housing Need to 2031. The VISUM modelling discussed later in the DITS and previously at the Maidstone Joint Transportation Board confirms that the Local Plan can be supported through an approach balancing local highway improvements with measures to increase walking, cycling and public transport provision. It is our view that the Leeds-Langley Bypass can act as a distraction and should only be looked at as part of a forthcoming Local Plan Review. Therefore support the Council's view in paragraph 9.74 that such a project may be feasible post 2031</p>	Support for Council's position noted	No change
Impact on Rural Service Centres			
<p>5 The extent of development proposed in the Rural Service Centres which are isolated from employment centres will be unsustainable. Residents will be forced to rely on the private car as public transport to these settlements is poor</p>	<p>i) The extent of development proposed in the Rural Service Centres which are isolated from employment centres will be unsustainable due to the lack of reliable and affordable public transport to residents will be forced to rely on the private car.</p>	<p>The ITS indicates that the Council will work with Kent County Council and the bus operators to improve frequency and reliability of services to and from the Rural Service Centres and Larger villages. Each Rural Service Centre also has designated existing and/or proposed employment areas.</p>	No change

	<p>i) There are plans for substantial housing development in the Weald and the document fails to address the issues of infrastructure links to and from the town.</p>	<p>The ITS indicates that the Council will work with Kent County Council and the bus operators to improve frequency and reliability of services to and from the Rural Service Centres and Larger villages. Each Rural Service Centre also has designated existing and/or proposed employment areas.</p>	No change
6 Bus services to the Rural Service Centres	<p>There is a need for substantial improvements to existing bus services linking Staplehurst and the other Rural Service Centres to Maidstone. There are particular gaps in services to/from Staplehurst in the early morning and early evening</p>	<p>The ITS indicates that the Council will work with Kent County Council and the bus operators to improve frequency and reliability of services to and from the Rural Service Centres and Larger villages. Each Rural Service Centre also has designated existing and/or proposed employment areas.</p>	No change
7 Rural bus services	<p>Bus services to many of the villages are already poor and many are subsidised and are under increasing threat from funding cuts. The suggestion within the ITS that the primary objective is to get more people walking, cycling and using public transport is laughable and demonstrates how little consideration to over 50% of the MBC electorate (found in the parishes) is not given a passing consideration.</p>	<p>The ITS indicates that the Council will work with Kent County Council and the bus operators to improve frequency and reliability of services to and from the Rural Service Centres and Larger villages. Each Rural Service Centre also has designated existing and/or proposed employment areas.</p>	No change
8.Action PT8: Promote the provision of high quality bus	<p>i) This will be a significant challenge to achieve on a commercial basis.</p>	<p>Comments noted.</p>	No change

<p>services from the rural service centres including interchange facilities at rail stations.</p>	<p>ii) A fast bus service is not possible in to Maidstone from rural service centres such as Staplehurst, due to the severe congestion from Linton Hill onwards, which takes up to an hour to navigate in rush hour. Our children's bus service was recently re-timed to 6.45AM to be able to reliably achieve a 8.15 drop off time in Maidstone. Without re-designing the traffic layout through the Coxheath crossroads, throughout Loose and in to Maidstone, it does not matter how fast or reliable the bus seeks to be. An alternative is to look at revising routes, (the eventual solution to providing a later timed bus), as the congestion will prevent any bus service from improving</p>	<p>Comments noted. The Council is working in partnership with Kent County Council to secure appropriate junction capacity improvements to ease the flow of all traffic including Public Transport the schemes are set out in the ITS and the Maidstone Borough Local Plan</p>	<p>No change</p>
<p>Park and Ride</p>			
<p>9 New park and ride facility should be introduced on land to the south of Cripple Street Loose</p>	<p>A new park and ride facility should be introduced on land to the south of Cripple Street, Loose (some 500-550 spaces and possibly a Cycle and Ride/Park and cycle facility).</p> <p>Given the deletion of the Park and Ride site at Linton Crossroads this site provides a viable and available alternative.</p>	<p>The proposed site is located 400m west of the A229 which will require buses to negotiate the A29/Cripple Street junction with possibly adverse impacts on its operation. Rat running may also be encouraged along roads west of the proposed site. Together with the difficulty of delivering comprehensive bus priority measures this means that providing a tangible journey time saving for P&R users would be challenging and affect the long term viability of the scheme.</p>	<p>No change</p>
<p>10 General comments on Park & Ride</p>	<p>i) A replacement Park and Ride facility should be provided for the south and north of Maidstone</p>	<p>The Council remains committed to maintaining the existing Park & Ride services.</p>	<p>No change</p>

	<p>ii) Local Plan contains no strategy for searching for new possible sites in the north and south of the town.</p> <p>iii) The previously proposed Park & Ride Site at Linton Crossroads should be reinstated to help address the severe traffic problems on the southern approaches to the Town Centre.</p> <p>iv) How does the closure of the 506 Park and Ride Service fit in with the desire to reduce congestion in the Town Centre?</p> <p>v) The Council should identify areas where land can be purchased to enable a revised P&R scheme from the north side of the town.</p>	<p>If appropriate alternative sites that are acceptable in environmental, traffic and locational terms, were to become available these would be considered.</p> <p>No such sites are currently apparent.</p>	
Public Transport (Buses)			
11 The ITS as a means of supporting the Spatial Strategy for new development	<p>Bus services are most effective and efficient where they can provide direct, fast journeys to the town centre and other attractors, minimally affected by other traffic.</p> <p>Focussing development close to primary transport corridors, such as the A274, where bus services are already running at high frequency, with appropriate transport infrastructure will create the best opportunity for buses to provide a viable alternative to the private car for many journeys.</p>	Comment supports the strategic ITS objectives.	No change
12 Bus priority measures on key strategic routes to the Town Centre. (Action PT1)	Very supportive of these as punctuality and speed of journey are a fundamental requirement for attracting passengers.	Support noted.	No change
13 Romney Place bus-lane (Action PT1)	Very supportive of this proposal as, particularly at peak times of other traffic flows, delays occur here for around 20 inbound journeys an hour.	Support noted.	No change

<p>14 Priorities at/changes to traffic signals (Action PT1)</p>	<p>Very supportive of the proposals listed and would add the following:</p> <p>Bus activated signals are required at the junctions of Earl Street with Fairmeadow and at the junction of Fairmeadow with St Faith's Street for buses (approx. 7 per hour) travelling north from Earl Street towards Maidstone East Station. Similarly bus activation of the signals enabling the right turn from Royal Engineers' Road into Chatham Road for buses serving Ringlestone when travelling towards Maidstone needs to be reintroduced.</p> <p>These measures will significantly improve bus journey times with little or no impact on other traffic.</p>	<p>Suggestions noted.</p>	<p>Amend Action PT1 to incorporate these proposals, stating that the Council will work with KCC to assess their deliverability and acceptability.</p>
<p>15 Action PT2 : Facilitate an improvement of bus services to ensure a good frequency of service provided by high quality buses is provided on all radial routes to the town centre within the Maidstone Urban Area.</p>	<p>i) Support all the above proposals in principle and are working towards the proposals on a commercially sustainable basis. However, the success of improving bus services to the new developments on the southern side of the A274, to the east of Parkwood Trading estate is for buses to be able to link through the developments – ie a road link (possibly bus only) between the proposed Rumwood Green and Langley Park Farm developments.</p>	<p>The Strategic Planning, Sustainability & Transportation Committee agreed at its meeting on 18 April 2016 to recommend to the Local Plan Inspector a change to the criteria relating to policy H1(5) (Langley Park Sutton Road) to require such a link to be provided.</p>	

	<p>ii) The actions for Public Transport under PT1 and PT2 are wholeheartedly supported. These seek to provide bus priority measures and increase bus service frequency and quality, which again underpins the Council's overarching sustainable, balanced approach. It is noted that this works towards achieving the aims under the Do Something 2 (DS2) VISUM modelling scenario discussed later in the DITS; this scenario offering the best overall outcome in terms of the units of measure used (journey time, distance etc.).</p>	Noted	No change
	<p>ii) Welcome the potential to increase Service 5 to 30 minute frequency but the service must be reliable, which is unlikely given the traffic congestion on the A229 Loose Road and therefore people will not use it.</p>	The mitigation measures identified for the Boughton Lane/Cripple Street and Wheatsheaf junctions would improve operating conditions for general traffic including buses.	No change
	<p>iii) Reducing the need for travel or enabling other more sustainable modes to be more attractive is to be supported in order to reduce the impact of increasing levels of traffic congestion.</p> <p>Careful consideration needs to be taken of the impact of integrating infrastructure for more sustainable modes eg use of bus lanes by cycles.</p>	Comments noted.	No change
16. Action PT4: Continue to engage with and facilitate statutory Quality Bus Partnership (QBP) schemes in Maidstone	Support the QBP on the basis that its objectives, if implemented successfully, should produce a win-win situation with increased passenger numbers and reduced traffic.	Comments noted.	No change

<p>17. Action PT6 Improvement of services between Maidstone Town Centre, M20 junction 7 and Sittingbourne/Faversham</p>	<p>i) With respect to Action PT6, which sets out an aspiration to increase bus service frequency for services to Sittingbourne and Faversham and the M20 Junction 7 area to 15 minutes, it is our view that this should concentrate on enhancements using local looped routes as opposed to long distances routes to neighbouring towns, which should primarily serve the interests of inter-urban passengers by providing fast and direct journeys that are competitive relative to the car. Bus services can be extremely expensive to improve, particularly those covering long distances, which give less opportunity to serve significant increased patronage. There is a risk that too high a frequency over a long distance can impact on viability, therefore it is our view that shorter loop services travelling around the Maidstone suburbs are both more cost effective and likely to yield greater patronage uplift and mode share increase, whilst underpinning long term commercial viability. Developers should not be expected to wholly fund the long distance service improvements to Sittingbourne and Faversham, a role that is much better played by commercial bus operators and a Quality Bus Partnership. Improvements to bus information set out in PT13 are supported.</p>	<p>Employees working in the Junction 7 are likely to travel to work from a much wider catchment than the Maidstone urban area, including from Sittingbourne and wider Swale. A local looped route will serve a much smaller range of origins/destinations, and have few other intermediate patronage sources. Arriva is already investigating the scope to increase frequencies to 20 minutes from the current 30. A further increase to 15 minutes would encourage a situation where passengers can “turn up and go” and short term financial support for this improvement is considered more likely to lead to long term commercial viability than funding a local looped service.</p>	<p>No change</p>
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	ii) There is an urgent need to improve this service and to extend its availability later into the evening and at weekends. Services often get delayed and despite this many are overcrowded with people needing to stand for long parts of the journey.	Comment noted.	Amend Action PT6 to specifically refer to the need for improved evening/weekend services as well as higher daytime frequencies.
18. Action PT7: Provision of a North West Maidstone Bus Loop	Support the proposal which, in order to maximise potential use, should be implemented at the earliest opportunity after first occupation takes place.	Comment noted	No change
19. Action P4: Improve parking enforcement on highways to reduce the impact of obstruction on bus reliability	Very supportive of this action which will reduce unnecessary delays and enable buses to access kerbside at bus stops so those with mobility difficulties can board and alight the bus safely.	Support noted.	No change
20. Improvements and interventions at Staplehurst Station	Staplehurst Sustainable Transport Package is all at the station; states here that other issues require further work to determine specific interventions. How/when will this be done? Must be guided by Staplehurst Neighbourhood Plan.	Comments noted. The ITS and supporting Walking and Cycling Strategy are living documents and as such specific interventions will need to be developed in more detail in partnership with local stakeholders.	No change
21. Bus services in Marden	Improved bus services serving Marden are required, especially to the town centre and both Maidstone and Pembury Hospitals (Objectives 1B and 2, Actions PT8 and RMB14).	Action PT8 is intended to address this requirement.	No change.
22. Maidstone Bus-Station	Agree that the existing bus station is not fit for purpose. However no plan for providing a new station is shown. There should be similar vision to that which provided the new bus station in Chatham. Why can't the Robins and Day showroom site in Palace Avenue be used? This is centrally located and would remove many buses from the High	Refurbishment of Maidstone Bus Station is currently the subject of a Local Growth Fund 3 bid, to complement the medium term investment plans of the Mall shopping centre. Initial work has identified the scope for potential improvements to the attractiveness and operation of the facility.	Amend Action PT12 to summarise the work undertaken since the DITS was published.

	Street and King Street. Agreed that this needs replacing/updating. Lighting could be improved further, cleanliness improved, more seating provided, a large part is unprotected from outside weather. There is not enough room for buses and they often get delayed by car queuing for the car parks in the area. The closure of the Arriva office was a mistake there is no one with authority in the station. The opaque glass should be replaced with clear glass to assist passengers.		
23. There should be a required minimum standard and age of buses.	There should be a required minimum standard and age of buses. Old more polluting buses should be forced to be withdrawn as they are a poor advert for public transport.	Being addressed via Action PT4.	No change
24. There should be greater ticket flexibility	More work should be done in ensuring greater ticket flexibility, such as removing the ban on buying return tickets before 9am. This is particularly important for services leaving large towns which are often empty at that time. Conversely buses between 9:30 and 10:30 are often over-crowded	Comments noted. The issue of flexible ticketing is being addressed via actions PT4 and PT13.	No change
25. Greater connectivity between timetables between buses and also between buses and trains	Timetables should be better coordinated at major interchanges and towns so that passengers are not forced to wait unacceptably long times to change services to for onward connections.	Acknowledge the desirability of this. With multiple operators and routes to be co-ordinated, the key is to increase service frequencies to a level which minimises interchange time. The ITS seeks to deliver high bus frequencies on Maidstone's radial corridors (Action PT2) and improve bus interchange capabilities at Maidstone East and West rail stations (Action PT11).	No change

Public Transport (Rail)			
<p>26. Action PT9: Lobby Government and Train Operating Companies for improved rail services to Maidstone</p>	<p>Welcome any proposals for improved rail services from any stations within the borough but concerned that no mention is made of the Mayor of London and TfL's proposals to take control of services on the lines from Kent into London. Concerned that TfL will monopolise train paths for the inner services to the detriment of services from outer Kent, i.e. within Maidstone Borough.</p>	<p>Comments noted</p>	<p>Amend section 9 to acknowledge TfL proposals. Also to stress under Action PT13 the need to promote and further develop integrated bus/rail ticketing.</p>
	<p>The following statement is included under PT9: "9.40 High Speed 1, where Southeastern serves many Kent towns into and out of St Pancras via Ebbsfleet in most cases does not benefit Maidstone. It is now possible to travel from Ashford to London in less than 40 minutes, whereas Maidstone East to Victoria still generally takes more than 1 hour, even though Ashford is many miles further from London than Maidstone."</p> <p>Don't disagree with the main thrust of this statement. However, there are still benefits to be had from HS1 which provides an alternative route from the centre of London which is generally very reliable, as well as a connection with East London, at Stratford which may grow in importance.</p> <p>Unfortunately, these benefits are cut short by the relatively early closure of the Medway Valley line for the evening. What's more, this</p>	<p>Comments Noted. The Council is seeking the introduction of an all-day service connection to HS1 as part of the on-going preparation for consultation on the new South Eastern franchise. The Council has already made known its views to Kent County Council and also to the Department for Transport and Transport for London following recent consultation exercises, and will continue to do so as the opportunity arises.</p>	<p>No change</p>

	early closure also limits the use that Maidstone residents can make of other rail services in North Kent. Extending the hours of operation of the Medway Valley line to match those of the rest of the network would be one way of addressing these deficiencies. Another way would be through reliable connections with buses, although that would require integrated services and ticketing which is a desirable objective in itself.		
27. Train stations in the Weald	<p>i) It is noted in the document that many commuters in Maidstone travel to rail stations in the Weald, in preference to those in the town. By inference many of these will be from the southern parishes of Maidstone. Section 17.142 makes mention of these commuters, but there is little in the document's proposed transport strategies that seeks to specifically address such issues; just increasing the frequency of the number 5 bus is unlikely to help especially when KCC is apparently currently seeking to further reduce its subsidies on this route!</p> <p>ii) Welcome improvements to the bus/rail interchange at Staplehurst Station</p>	A reduction in the level of service on route 5 is not anticipated given that the frequency improvements will be funded by developments in Staplehurst. Support for Staplehurst rail station improvements is welcomed and this will improve bus/rail connectivity as well as pedestrian/cycle access from the village. A key aim of the Walking and Cycling Strategy is to create cycle routes to rural public transport hubs using a mixture of quiet lanes and shared use footways.	No change
28. Railway Service improvements: Action PT9	Please include the Marden – Staplehurst – Headcorn line in this note.	Noted and agreed	Acknowledge this line under Action PT9 – but service quality on this line is good and leads to many Maidstone commuters using this line rather than the stations in the town, as

			the ITS acknowledges.
	ii) Has consideration been given to how the rail route could be optimised to encourage rail access from rural locations to Maidstone? Many people in rural villages already have an annual season ticket, that provides discounts for family members.	Noted and agreed	Amend ITS to cite the role of the Medway Valley CRP in promoting increased use of rural rail stations.
	iii) Please specify if this relates just to Maidstone, or to all rail stations across the Maidstone Borough?	Noted and agreed	Amend Action PT9 to read "Lobby Government and Train Operating Companies (TOCs) for improved rail services to the Maidstone urban area".
29 Transport interchanges (PT11) are too focussed on Maidstone	Why is maximising interchange capabilities limited to urban Maidstone stations? Please include other rural service centres with main line train services, with well used bus services that provide onward journeys (e.g. mainline train to Staplehurst, #5 bus service connects on to Cranbrook and Hawkhurst).	Noted and partially agreed	Add a further Action to cite the interchange improvements already programmed for Staplehurst.
30. Transport user groups	The Weald has a rural Transport User Group, that meets with bus companies from across Kent and East Sussex to discuss issues. Please can we ask that a bullet point be included to specify that "bus companies should seek to meet regularly with existing Transport User Groups, from across the Borough	Agreed.	Provide additional commentary under Action PT4.
31. Involvement of rail operators/ rail infrastructure providers	What input have South Eastern and Network Rail had into this document?	There is ongoing engagement on transport issues through the LSTF West Kent Working Group.	No change

32. Re-open Teston Halt	Consider re-opening Teston Halt. This was closed at the end of the 1950s. We assume the suggestion that it is re-opened relates to the fact that it is adjacent to what is now Teston Bridge Country Park and there is an expectation that visitors will travel to it by train along the Medway Valley Line. We are not aware of any survey of the “source” of current visitors to the Country Park, but it is rather unlikely that a significant number live conveniently close to a railway station that would easily service a re-opened Teston Halt; that road-based traffic would continue. There may be the aspiration to encourage those living in the town to walk to Maidstone West station, or persons living near relevant stations to use the Maidstone Valley Line, to reach Teston Halt, but, except for special events, usage is unlikely to be material. It is very unlikely that Teston Country Park would generate sufficient rail-based visitors to justify the re-opening of Teston Halt.	Agreed. The Council is seeking to establish the reintroduction of such a scheme and has commented as such to the recent DFT/TfL and KCC Consultations on rail franchising. This is included in Action PT10	No change
33. Marden Station	Major improvements required to Marden railway station including additional parking provision to accommodate increased demand arising from housing development in the wider station catchment area (Objectives 1D and 3, Action RMB14) and step-free access to the ‘down-line’ platform (Objective 5, Action RMB14).	The scope for additional car parking provision needs to be carefully considered so as to meet demand without discouraging access by sustainable modes. However, the need for rail stations to be accessible by all modes, including by the mobility impaired, is recognised.	Amend Action PT5 to incorporate access improvements for Marden Station.
34 Crossrail 2	The Council should be investigating to see if any benefits from this scheme could accrue to the Borough	The route of Crossrail 2 as currently indicated would not seem to have any benefits for the Borough. The Council will continue to monitor the	No change

		project as it moves forward	
Cycling and Walking Measures			
35. Cycling and walking.	Planned/proposed improvements need to be effectively and steadfastly promoted even in the light of some community opposition.	Support for walking and cycling proposals noted.	No change
36 .New cycle route from NLL to Maidstone Town centre	With the removal of the proposal to close the exit of Cranbourne Avenue which I have championed on behalf of local residents, I would like to see a cycle route designated from NLL to town via Pheasant Lane / A274, Cranbourne Avenue, Marion Crescent, Plains Avenue, through alley to South Park Road and alone West Park Road and Willow Way.	Suggestion noted.	Incorporate within Walking & Cycling Action Plan, feasibility of proposal to be investigated through detailed audit.
37. Cycle to work targets	The targets in chapter 10 of the DITS, to aim for only a modal shift to 3% of work trips by bicycle in 2031 are too modest. With an enhanced infrastructure for cycling we believe that the council should be aiming for a cycling 5 of 6% to 10% of all journeys to work by 2031 and a much higher proportion of all journeys to school.	The targets have been identified to be realistic and achievable. Para. 10.6 stresses that the DITS is designed to be a living strategy which can adapt to changing circumstances. As such, there is scope to modify this target in future years as part of the monitoring and review process.	No change.
38. General actions relating to cycling	Actions in the report are supported, namely: C1, C2, C3 C4(a), C4(b), C5, C6, C7, C8, C9, C10, C11, and C13.	Support noted	No change
Highway schemes and Capacity Improvements			
39 . Action H1: Targeted implementation of highway improvements at key strategic locations to relieve congestion.	The Wheatsheaf junction should be re-modelled to enable its use as a shared space scheme	This has been considered by the County Council as part of its recent A229 corridor study and was not taken forward as an option	No change

40. Extra roads should be built	i) Extra roads should be built to provide additional capacity. E.g. Hermitage lane will have lots of extra houses but will not be widened	The results of strategic and localised transport modelling demonstrate that following mitigation through targeted highway capacity improvements, public transport and walking/cycling enhancements, the residual cumulative traffic impact of Local Plan developments cannot be regarded as severe.	No change
	Where are the proposals to widen and improve Upper Stone Street to provide the previously proposed dual carriageway extension from Bishops Way via Upper Stone Street to Loose Road?	Localised capacity improvements – fine. But building urban dual carriageways will induce new vehicular traffic, detracting from the objectives of the ITS. and adversely affect air quality.	No change
	A By-Pass dual carriageway to the SOUTH of Maidstone from Leeds Castle junction M20 through to the Wrotham junctions would long-term solve almost all the problems. A tunnel or high-level carriageway along the route of the M20 from junction 8 to Wrotham would also solve the horrendous truck congestion of the outskirts of town.	Although these proposals would undoubtedly increase highway capacity, their feasibility and acceptability would have to be investigated via detailed route assessment, environmental impact assessment, sustainability appraisal and detailed analysis of costs and benefits. Funding sources sufficient for what would be an extremely high cost intervention are currently unclear.	No change
41. Capacity improvements at the Wheatsheaf junction	i) How will this be achieved?	The Council in conjunction with the County Council are working on schemes to improve capacity at this key junction. The commitment to secure improvement at the junction is set out in the ITS and the Local Plan	No change
	ii) This junction needs a scheme to be implemented as soon as possible as the junction is already congested.		

	iii) A shared space scheme should be implemented	This has been considered by the County Council as part of its recent A229 corridor study and was not taken forward as an option	No change
42. Objective A is all about walking and cycling. Pavements in Staplehurst need improvement	There is a need to sort out pavements in Staplehurst as many are uneven and too narrow for disabled and elderly people.	The Walking and Cycling Strategy recommends a detailed audit of the Borough's walking and cycling corridors to identify missing links, gaps or barriers. Staplehurst would be included in this review.	No change
43. Capacity improvements at Linton Crossroads.	i) The ITS refers to capacity improvements at Linton Crossroads, but is unclear on the detail.	A mitigation scheme has been designed that does not rely on third party land and funding is being secured through s106 agreements	No change
	ii) This junction needs a radical solution to address traffic from the new housing development at Marden, Staplehurst, Boughton Monchelsea and Coxheath as well as any Leeds-Langley bypass		
44. A229 junction with Marden Road and Headcorn Road Staplehurst	i) No detail as to how improvements at this junction will be achieved.	This is a preliminary design which establishes the principles of a mitigation scheme which can be delivered within the highway boundary. The potential negative impact on pedestrians has been acknowledged but alternative routes are available with the scope for signage and crossing infrastructure to promote their use. This will be considered further as the design is progressed.	No change
	ii) What has been proposed to-date however is likely to reduce pedestrian safety as pavements are likely to be narrowed and a crossing removed.		
45. Sutton Road/Loose Road Bus-lane	i) Whilst improvements to bus services are needed, there should be no revised proposal for the introduction of a bus lane	Bus priority measures are essential for fast and reliable bus services which provide an attractive	No change

	<p>along the A274/A229 from Wallis Avenue to Armstrong Road</p> <p>ii) There is much greater scope for bus priority measures on the A274 than Loose Road.</p>	<p>alternative to the private car as well as access to essential amenities for non-car owners. The A274 Sutton Road Corridor Study includes preliminary designs which confirm that bus priority measures are technically feasible without detriment to general traffic.</p>	
46. NW Maidstone in particular the A26/Fountain Lane junction	<p>The road improvements in the Fountain Lane area be brought forward as soon as possible so that they can be implemented before the completion of the developments on Hermitage Lane, otherwise it won't be physically possible to do it, even if it's only carried out at night time.</p>	<p>Noted. Timing for the scheme is included within the s106 agreements relating to approved development. The Council is working in conjunction with the County Council to deliver schemes early as appropriate and where possible</p>	<p>No change</p>
47. A249 between M20 Junction 7 and M2 Junction 5	<p>Large development areas as proposed in the draft Local Plan will inevitably increase traffic using the A249 between the M20 and the M2 junctions. The Plan does not pay reference to this and as yet there are no specific plans to upgrade the road from its current substandard level. It is clearly unacceptable to recommend sites for major development when these essential matters have not been addressed.</p>	<p>Comment noted. At the J7 masterplanning meeting on 10 March 2016 Highways England raised the need for KCC to consider the interaction between these motorway junctions.</p>	<p>KCC to confirm what study is being or will be undertaken to consider future traffic flows on the A249 between Sittingbourne and Maidstone. Amend ITS to reference the work being undertaken.</p>
48. Highway needs in rural locations	<p>What consideration has been given to major Highways needs in rural locations? Whilst it is admirable we have 13 policies to promote cycling, for the 1 in 2 residents who live in more rural areas, cycling is simply not an option, due to the terrible road surfaces, lack of safe routes and steep approaches. These communities need investment in their roads to be of decent</p>	<p>The importance of well-maintained highway infrastructure is fully recognised. Action W4 identifies the need for a review of Personal Injury Collision (PIC) data involving vulnerable road users in order to prioritise areas for safety improvements. The Walking and</p>	<p>Amend ITS to reference speed control measures.</p>

	quality, with good signage and speed controls where loss of life, or serious accidents are frequent.	Cycling Strategy also identifies a network of rural cycle routes along lightly-trafficked lanes. The Council has also agreed to commence a study of roads in the Borough where 20mph limits could be pursued	
49. Heath Road/Westerhill Rd/Stockett Lane junction Coxheath	How has it been determined that this junction will continue to operate satisfactorily? Many people park on the roads close to the junction and hinder its safe operation.	Assessment has been undertaken using industry standard PICADY transport modelling software, taking into account future Local Plan growth. The scope for enhanced parking enforcement in this area will be investigated (Action P4).	No change
Parking			
50. Stagger school opening and closing times	School opening and closing times should be staggered to reduce tidal flows of school-based/bound traffic, particularly on the A229.	Comment noted.	Amend the commentary for Actions W5 and C8 to note the potential benefits of staggered opening/closing times, to be pursued through the School Travel Plan process.
51. Introduce a 'Red-Route' on the one-way system in Maidstone	Has inclusion of a red route – similar to those utilised in inner and outer London, been considered for the one way system around Maidstone? (For example coming past the “old Cinema” and up Lower Stone Street).	The benefits of red routes on major road corridors in large cities are recognised. However, in the first instance the enhanced enforcement of existing restrictions is considered the most appropriate way forward (Action PT4), with the situation being kept under review and the feasibility of other interventions, such as red	Amend Action PT4 to stress that other interventions will be investigated if ongoing monitoring indicates that this is appropriate.

		routes, investigated if the existing restrictions prove to be insufficient to maintain reliable bus operations.	
52. Action P1 Parking Standards	Supports the Council's vision on parking within P1 . Evidence-based parking standards allow for the positive planning of development with the correct level of parking to serve residents and employees	Support noted	No change
53. P3 Maintenance of current levels of parking provision in the Town Centre	Does not wholly support P3 , in that work carried out by MBC in 2011 by JMP Consultants confirms a significant level of oversupply within the total parking stock, and this is land that could be used for other purposes. Furthermore, excessive parking supply attracts car trips into the town centre when these trips are well catered for by public transport and cycling in particular. We suggest that alternative wording could be presented here allowing the Council flexibility to continually review town centre parking supply to make best use of land and associated income streams.	Agreed	Amend Action P3.
54. What about pavement parking and other hazards to pedestrians?	The strategy is obsessed with walking and cycling and yet fails to deal with prolific pavement parking and also hazards caused by overhanging trees and hedges, bins left on pavements and cyclists using footpaths	These are detailed issues which a strategy is unable to capture adequately. However, the Walking and Cycling Strategy recommends that a detailed audit of the Borough's walking and cycling corridors is commissioned. This will enable any barriers to movement, such as those identified in the representation, to be identified and mitigation measures developed to address these.	No change.

Strategic Road Network			
55. Impact on Strategic Road Network	<p>Highways England remain supportive of the principles of this document which are consistent with the NPPF. The document seeks to promote sustainable modes of transport, achieving reliable vehicle journey times and supporting sustainable development.</p> <p>We do however need to see evidence that the approach to the transport strategy is sound. The approach should assess the impacts of the full element of the Local Plan that to date has not received planning consent.</p>	Localised modelling at M20 junctions 5 to 8 is being commissioned to assess the capacity of these junctions with the full Local Plan allocations, as the Maidstone VISUM model does not model these in detail.	Amend ITS to note the further modelling being undertaken.
56. Lower Thames Crossing	<p>i) This appears not to have been taken into account and neither have the traffic implications of such a route on Maidstone Borough.</p> <p>ii) It is noted that the Transport Strategy makes only passing reference to the Third (or Lower) Thames Crossing proposals. The strategy refers to this as being at a relatively early stage; whilst also highlighting the potential for work to commence in 2020/21 with potential opening in 2025. The need for a Lower Thames Crossing is well established and the options process has advanced to the stage of considering approach routes for a crossing between East Tilbury and Gravesend. The current consultation process, active at the time of the publication of the DITS, was primarily considering options for the route north of the river. There is little doubt that this proposal will progress and that it</p>	This is a scheme at an early stage in preparation. Initial public consultation was undertaken early in 2016. The Government/HE announcement of the way forward for the scheme is expected later in 2016. The scheme that was subject to consultation did not include proposals to upgrade the A229 link between the M20 and M2 on cost and environmental grounds. As such the potential impact on the Borough is considered to be fairly minor.	No change

	<p>should be a significant material consideration for the development of the DITS and the spatial planning of the borough. It also evident from the outcome of the Strategic Planning, Sustainability & Transportation Committee (8th March 2016) that MBC fully support the proposed crossing and are aware of the significant economic benefits that could be derived from the new crossing. However, there is a little evidence from DITS and the Local Plan that it supports that any attempt has been made to effectively spatially plan to take advantages of the opportunities.</p> <p>The Lower Thames Crossing will provide a significant new piece of infrastructure in the local area, with supporting additional infrastructure such as potential widening of the M2 west of junction 5, and will present the opportunity for significant economic development through new connections for the northern areas of the borough. Development to the south of the M20 and Maidstone town will be restricted from taking advantage of these opportunities; constrained as it is by the limitations of the town's radial, rural roads. Residual demand for use of the route from development to the south will further burden these restricted areas of the network. Development to the north of the borough presents the best opportunity to take advantages of the opportunities arising from this new infrastructure, without undue pressure</p>		
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	on the County Town.		
57. Emerging technology and trends	Whilst Walking and Cycling issues take up a large section of the DITS document, considerably less space is given to addressing the effect of new technologies and demographic changes, especially the aging population, on the future of transportation. Whilst some might feel that the increase in uptake of electric or hybrid vehicles might address issues of Air Quality/Pollution. The DITS document notes the current lack of charging points around the Borough. There is little mention of the upside of developing alternatives such as driverless vehicles and managed light transport systems and the downside of increased delivery traffic caused by the uptake of remote shopping.	Noted. The ITS and the Walking and cycling Strategy are both 'living' documents and will be reviewed. The Council will monitor such developments and their potential implications and revised both as appropriate.	No change
Environmental Issues			
58. Air Quality	i) The ITS proposals will do little or nothing to improve air quality in the urban area. The data relating to air quality is out-dated and	The most recently available air quality data was cited; however this will be reviewed as part of the work to	Review most recently available air quality data in finalising ITS and Walking &

	should be refreshed	finalise the ITS. The ITS sets out a balanced package of transport interventions to enhance and encourage sustainable travel choices, i.e. reducing single occupancy car travel. Delivery of these interventions, alongside encouragement of ultra-low/zero emissions vehicles, will have a tangible impact on air quality in the medium to long term.	Cycling Strategy.
	ii) The existing monitoring equipment is ill-maintained and/or located in the wrong place	The Council is part of the Kent Air Quality Partnership through the Mid Kent Shared Environmental Services Department. The existing stations are regularly monitored and their positions reviewed. For example a new installation has been undertaken in Hermitage Lane and the equipment located at the Bridges Gyrotory will be moved to a new location.	Liaise with Mid Kent Environmental Shared Service team to ensure monitoring equipment is sited correctly and maintained.
59. Groundwater protection	Where transport infrastructure is proposed in Source Protection Zone 1 for a water supply abstraction, drainage strategies must have sealed drainage.	This is a matter for detailed design or (if required) a planning application	No change
60. Action UL/Zero Emissions 1 and H6	Supported. One of the most significant barriers to the uptake of alternative propulsion vehicles is the availability of charging/filling infrastructure, and the Council can play a role in improving this type of infrastructure within its own car parks and sites. Zero emissions vehicles play a role in reducing air quality effects of transport, from	Support Noted	No change

	which Maidstone can benefit significantly.		
Content of the ITS			
61. Failure to agree the ITS with Kent County Council	It is a matter of public record that the Borough Council's proposed housing provision has been heavily criticised by the County Council – despite the fact that the County Council itself has promoted a number of its own sites for residential development. In addition to this, no solid evidence has been put forward by the County Council that justifies its contention that the objectively assessed housing needs of Maidstone are incorrect. This conflict has had severe implications on the working relationship between both authorities, not least of which has been the failure to agree on a transport strategy. Indeed, the DITS effectively acknowledges this in para. 1.3, where it states that Maidstone's transport network has come under increasing strain on account of the growing demand for travel. It is a fact that if there is no strategy and no investment in transport infrastructure, then things will only get worse.	The Council continues to work with the County Council towards an agreed ITS. The Highway intervention and sustainable transport measures have been agreed by both Councils.	No change
62. The modelling work to support the ITS is not sufficient	The appraisal of the objectively assessed need (OAN) promoted in the Local Plan is referred to in the DITS as scenario DS4, or the fourth Do-Something Scenario. Critically the three prior scenarios DS1 to DS3 were historical and tested options under the previous Local Plan housing allocation numbers of circa 10,000 across the plan period. Full details of the testing of scenario DS4 have thus not been presented,	The results of strategic transport modelling scenario DS4b, testing the Objectively Assessed Need of 18,560 housing units, demonstrate that following mitigation through highway capacity, public transport and walking/cycling improvements, the residual cumulative traffic impact of the developments cannot be regarded	Amend section 11 (The Modelling Context) to provide commentary on the results of the most recent modelling.

	<p>such that it is not possible to ascertain how well the scenario reflects the spatial distribution of growth as now proposed.</p> <p>With a single model scenario considered to assess the implications of the spatial planning policy and the transport strategy to support it, it is apparent that the DITS is simply a reactive strategy seeking to mitigate the impact of Local Plan aspirations. In fact, there is no evidence of genuine transport network spatial planning options appraisal on the basis of the OAN housing numbers.</p>	as severe.	
<p>63. The positive aspirations of the ITS in will not reduce the demand for travel as they are not reflected in the spatial strategy and resultant allocations in the local plan</p>	<p>Reducing the need to travel can realistically be considered to mean reducing the need to travel on the wider network. Very local traffic generation within the confines of the immediately local area or, for instance, within a single development site is sufficiently inconsequential travel as to be consistent with not travelling.</p> <p>One of the key ways in which spatial planning can contribute to the aim of reducing demand for travel is to seek greater levels of mixed use development, which bring together the origins and destinations of trips, such that external travel is minimised.</p> <p>With appropriate selection of sites and promotion of sustainable travel measures, there is significant scope for large scale mixed use sustainable development to deliver wide</p>	<p>The aims and objectives of the draft ITS are fully reflected in the spatial strategy being pursued. The Maidstone urban area is the principal focus for development in the Borough with the regeneration of the town centre, residential development at strategic locations to the southeast and northwest of Maidstone and employment uses around M20 Junction 7 providing mixed use developments in close proximity to existing transport infrastructure whilst delivering mitigation measures where necessary. These mitigation measures comprise a package of highway capacity improvements, enhanced and extended bus services and high quality walking and cycling</p>	No change.

	<p>spread benefits across the district. For instance, a large mixed use development could deliver significant infrastructure in the form of Park & Ride and significantly enhanced bus services.</p> <p>Such infrastructure would derive benefits beyond the immediate locality, in particular reducing traffic demand in the congested central areas of Maidstone town. Again these positive aspirations of the DITS have not proactively contributed to the spatial planning and resultant allocations.</p>	<p>routes integrated with the existing network.</p>	
<p>64. The ITS will not effectively change travel behaviour</p>	<p>i) In reactively seeking to mitigate the OAN in the emerging the Local Plan the DITS can at best hope to achieve a marginal change in travel behaviour as a residual benefit. The apparent majority of infrastructure proposals set out within the Infrastructure Delivery Plan (IDP) are localised highway network and junction improvements aimed at mitigating the impact of site allocations. This is evident from paragraphs 2.2 to 2.7 of the IDP, which comprehensively summarise the highways interventions but make only passing reference to sustainable travel measures.</p> <p>The evidence base supporting (but not published with) the DITS is focused on assessing the implications of the highway interventions. The inability of the modelling framework to model much of the sustainable initiative is in large part due to the relative insignificance of these</p>	<p>The aims and objectives of the draft ITS are fully reflected in the spatial strategy being pursued. The Maidstone urban area is the principal focus for development in the Borough with the regeneration of the town centre, residential development at strategic locations to the southeast and northwest of Maidstone and employment uses around M20 Junction 7 providing mixed use developments in close proximity to existing transport infrastructure whilst delivering mitigation measures where necessary. These mitigation measures comprise a package of highway capacity improvements, enhanced and extended bus services and high quality walking and cycling routes integrated with the existing network.</p>	<p>No change</p>

	<p>measures. The model is insufficiently detailed to reflect, for instance, marginal changes in bus frequency. This should not be seen as a criticism of the modelling framework – as in practice the benefits are likely to be relatively negligible.</p> <p>The modelling framework would demonstrate the benefits of more significant changes in the spatial planning and supporting strategy. For instance a significant shift in the site allocation strategy towards objectively more sustainable development, such as demonstrated through a comprehensive strategic allocations options appraisal, would derive benefits. Again, this is less about the merits and abilities of the modelling framework and more the tangible benefits of alternative spatial planning strategies in seeking to change travel behaviour.</p>		
	<p>ii) Welcome the document and aspirations to encourage people to get out of their private vehicles in favour of walking, cycling or using public transport however this document fails to address the issue that many residents face:</p> <ul style="list-style-type: none"> • They have large distances to travel. • The infrastructure, especially footways in rural areas and bus services, do not exist. • The closure of local facilities means that they have to use their vehicles to access shops, GPs etc. 	<p>It is acknowledged that for residents living in rural areas in particular the private car will continue to be the most realistic option for many journeys. However, targeted improvements to encourage sustainable travel choices, especially for short journeys, will contribute towards the improved operation of the local transport network.</p>	<p>No change</p>

<p>65. The ITS fails to effectively promote modal shift</p>	<p>i) More significant and effective sustainable transport initiatives could also apparently demonstrate the change in travel behaviour through the promotion of modal shift sought through the DITS. Maidstone is not unique in being a district with a key focal town, which attracts much of the employment, retail and leisure travel demand, but which suffers from notable town centre congestion. Maidstone is also not unique in having responded to this previously through the introduction Park & Ride infrastructure which seek to directly change travel behaviour and reduce the number of people seeking to travel by car into the town.</p> <p>Despite the objective, the IDP makes no reference to park and ride and includes no measures related to it. When it is considered that the current facility at Sittingbourne Road has recently closed, it is apparent that measure within the IDP fail to maintain the existing provision of park and ride and certainly do not enhance it.</p> <p>In many cases Park and Ride can be delivered successfully as part of strategic development, where the public transport facilities can fulfil a dual function of serving the P&R facility and providing sustainable travel for the supporting development. The benefits of this approach can be extended further if the P&R is integrated to mixed use development, which has the scope to</p>	<p>The aims and objectives of the draft ITS are fully reflected in the spatial strategy being pursued. The Maidstone urban area is the principal focus for development in the Borough with the regeneration of the town centre, residential development at strategic locations to the southeast and northwest of Maidstone and employment uses around M20 Junction 7 providing mixed use developments in close proximity to existing transport infrastructure whilst delivering mitigation measures where necessary. These mitigation measures comprise a package of highway capacity improvements, enhanced and extended bus services and high quality walking and cycling routes integrated with the existing network.</p>	<p>No change</p>
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	<p>generate bi-directional demand, further contributing the viability of the services.</p> <p>An ideal location for new P&R facilities would be to the north of the borough, in particular on the A249 corridor, thus replacing the facility lost at Sittingbourne Road. A new facility on the A249 could provide multiple benefits. It would allow the significant demand for movement between Swale and Canterbury coastal towns to be captured before progressing in the congested areas south of the M20. It could be supported by significant infrastructure enhancements such as a dedicated additional lane for buses, prioritising bus travel towards Maidstone town further encouraging non-car travel.</p> <p>Finally, a P&R in this location when brought forward with major mixed use development could support significant enhancements to the public transport links between Swale and Maidstone, such as through development pump-primed bus services.</p>		
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	<p>ii) Believe that whilst the overall aims of the policy are valid and will be of great help, the policy is missing the elephant in the room - that the majority of journeys will continue to be by car. i.e. the stated chance of modal shift is over optimistic. The SHLA is creating large number of house in two areas of the borough in particular that will generate many new car journeys. The transport policy does not address these. Most will wish to reach the motorway to travel elsewhere. Key transport routes e.g. Willington Street, Hermitage lane will be over stressed. The river crossing system will continue to be 'full'. There simply aren't even mentioned proper measures to address this. So, proper motorway access must be factored in, otherwise the transport plan's goals will be under-realised.</p> <p>Have to mention the Leeds bypass of course. Without that the 'busy Sutton Rd corridor' all the way to the Medway will only become worse - with attendant pollution putting off walkers and cyclists and making priority bus journeys theoretical.</p> <p>Support less car reliance. But doesn't think this plan can deliver it.</p>	<p>The aims and objectives of the draft ITS are fully reflected in the spatial strategy being pursued. The Maidstone urban area is the principal focus for development in the Borough with the regeneration of the town centre, residential development at strategic locations to the southeast and northwest of Maidstone and employment uses around M20 Junction 7 providing mixed use developments in close proximity to existing transport infrastructure whilst delivering mitigation measures where necessary. These mitigation measures comprise a package of highway capacity improvements, enhanced and extended bus services and high quality walking and cycling routes integrated with the existing network.</p>	No change
66. The ITS fails to improve network efficiency	By failing to fully explore options for spatial planning for the OAN through the DITS, the Local Plan does not demonstrate that wider network is being efficiently utilised.	The A249 corridor is largely within the designated Kent Downs AONB. Development to the north of the M20 would not be well related to existing sustainable transport	No change

	<p>This focus of concern on the southern areas of the borough is a logical consequence of the configuration of the strategic highway network. Kent is served by two internationally important highway corridors, the M20 and the M2, both of which lie in the north of the borough and north of the Maidstone Town. The southern areas of the borough connect to the strategic network by means of a limited number of feeder routes, such as the A229 which routes through Maidstone Town to get to the M20 and beyond to the M2.</p> <p>A spatial development plan that includes a focus of development to the south of the borough inevitably increases pressure on the local roads and the Maidstone town network. By contrast, development to the north, particularly strategic mixed use development in proximity to the strategic highway network, could significantly enhance the efficient use of the transport network. More efficient use of the existing network would reduce the need for mitigation intervention and provide the scope for increased sustainable travel interventions.</p> <p>The DITS makes limited reference to the emerging proposed improvements to Junction 5 of the M2. Although the junction lies principally just outside the Borough Boundary, the improvements have a significant role to play in supporting growth within Maidstone. The junction serves as key link, via the A249, to the</p>	<p>networks and thus would create a culture of car dependency.</p>	
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	<p>strategic corridor of the A2 to the east and the A249 itself as it continues north. The Government, through Highways England, are committed to spending up to £100 million on the improvements which will address existing capacity constraints and provide the opportunity for significantly enhanced access to the strategic network. In focusing on localised mitigation of impact, the DITS does little to explore the opportunities for spatial planning that can take advantage of these significant enhancement.</p> <p>Development focused to the north of the district, beyond the M20, would have the unique opportunity to take advantage of both the enhancements to Junction 5 and the new Lower Thames Crossing; in order to provide sustainable and significant economic growth in the Borough, with limited impact on the more constrained parts of the highway network.</p> <p>It is apparent the stated objective of the DITS is not reflected in the spatial planning within the Local Plan. The failure to explore the options for significant development in the north of the Borough results in opportunities to maximise the efficient use of the existing and rapidly emerging transport network.</p>		
67. ITS monitoring and review	The targets set out for mode shift in 10.2 are wholeheartedly supported. The DITS is correct that these targets need to be 'realistic and	Support noted.	No change.

		ambitious', and the Council should not be afraid of seeking to use targets which at the current time appear difficult to achieve. Technology on personal transport is rapidly changing, particularly in respect of alternative fuel and autonomous vehicles, and at such a pace that these technologies could be widespread within the term of the ITS. Evidence of this is in the Tesla rapid charging station located at Eclipse Park, which allows a vehicle to recharge to a 300 mile range in less than half an hour.		
68. VISUM strategic modelling		<p>The DITS is correct in its reporting on the evolution of the Maidstone VISUM model since 2007/08, although being a very detailed process there is a great deal of evidence showing apparent misreporting by KCC on the most advantageous outcome from each of the scenarios tested. Since 2015, a number of different scenarios have been tested, as confirmed within the DITS, but the reporting of each scenario outcome has been inconsistent and has, acted to confuse the outcomes presented by the model and the most advantageous approach to underpin the Local Plan.</p> <p>Agree with the DITS statement in 11.16 that VISUM, being a strategic highway model, is unsuited to the assessment of individual junction capacity. In our view, the VISUM model process has been over relied upon by KCC and has adversely affected their own decision making process. The detailed LinSig junction</p>	Comments noted.	No change.

	<p>capacity work carried out by DHAT in assessing the strategic residential developments off the A274 Sutton Road confirms that there are schemes open to the Council to mitigate the effects of development in south Maidstone and that the findings of the VISUM model cannot be wholly relied upon, particularly when it comes to assessing the viability and success of various different junction level measures.</p> <p>In concluding on this point, we are supportive of the Do Something 2 (DS2) scenario within the VISUM model analysis, as this approach is wholly compliant with overarching Government policy on sustainable transport. Furthermore, evidence shows that this DS2 strategy can be delivered economically and viably and will act to fully accommodate the economic and residential development proposed in Maidstone.</p> <p>However, given that the Council has opted to base its evidence in the DITS on the DS4 VISUM modelling scenarios, We object to Draft Local Plan Policy DM24 on the basis that better performing scenarios that better reflect national planning policy on sustainable transport have been overlooked and should be reviewed.</p>		
69. Integration with adjacent authority's strategy	Further integration with the equivalent strategy for Tunbridge Wells Borough Council is required (generally).	Comments noted.	Cite equivalent transport strategies in section 5 (Policy Context) and the proposals affecting

<p>70. The ITS contains no effective mitigation and is based on a package of transport measures that have not been agreed by the Local Highway Authority</p>	<p>The draft Integrated Transport Strategy is founded on a package of transport improvements that has not been agreed by the Local Highway Authority</p> <p>The supporting Integrated Transport Strategy (ITS) should enable the impacts of the planned growth to be understood and mitigated and provide a basis for identifying how any required improvements can be funded and delivered through new development. This approach is set out within the Planning Practice Guidance¹ as a means of ensuring that a Local Plan is underpinned by a robust evidence base.</p> <p>The draft ITS prepared by Maidstone Borough Council (MBC) does not achieve these fundamental requirements. Despite intensive VISUM traffic modelling work jointly commissioned by KCC and MBC, the draft strategy is founded on a package of transport improvements that has not been agreed by KCC - as Local Highway Authority - and, fundamentally, does not provide an acceptable means of mitigating the impact of the planned growth in housing and employment. This will result in severe impact on parts of the highway network, most notably on the A229 and A274 in south and south east Maidstone.</p> <p>The traffic modelling evidence to substantiate these concerns was presented to the Maidstone</p>	<p>The package of transport interventions within the draft ITS is substantially represented in VISUM model scenario DS4b. The results this scenario, testing the Objectively Assessed Need of 18,560 housing units, demonstrate that following mitigation through highway capacity, public transport and walking/cycling improvements, the residual cumulative traffic impact of the developments cannot be regarded as severe.</p> <p>This conclusion is further substantiated by the findings of localised junction modelling for the A274 corridor which has assessed the cumulative impacts of development in south east Maidstone.</p>	<p>Maidstone Borough.</p> <p>No change</p>
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	<p>Joint Transportation Board (JTB) which on 7 December 2015 resolved:</p> <p><i>“We agree in the absence of an agreed transport strategy and in light of the evidence presented to this Board demonstrating Maidstone’s significant highway capacity constraints, this Board recommends that a transport strategy be taken forward urgently by the Borough and County Councils covering the period of the Local Plan, with a further review completed in 2022. The aim of this strategy will be to mitigate the transport impact of future growth, in the first instance up to 2022. The strategy should comprise of the key 3 highway schemes and public transport improvements agreed by the Board, and further traffic modelling will be required to identify its impact. It is proposed that the £8.9 million growth fund monies identified for transport be used to accelerate the delivery of these improvements. Existing developer contributions may then be used to support further measures. The agreed transport strategy should also develop the justification for a relief road between the A20 to the A274 (the Leeds and Langley Relief Road), along with a preferred route, in order to allow testing with other strategic transport options and identify all source of potential funding to enable the schemes to be implemented at the earliest opportunity.”</i></p> <p>The published draft ITS does not reflect the JTB</p>		
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	<p>resolution in that it fails to include the opportunity to achieve a jointly agreed ITS covering the period to 2022. This could be founded on the 14,034 houses that MBC expects to be delivered within this period and the accelerated delivery of highway improvements.</p> <p>A report was submitted to the KCC Environment and Transport Cabinet Committee meeting held on 11 March 2016 recommending that an objection should be raised to the draft ITS on the grounds that the impact of the Local Plan on the highway network over the period to 2031 will be severe in the absence of effective mitigation.</p>		
General issues			
71. Disabled and ageing sections of the population	The strategy and its priorities don't take into account the need of the ageing and disabled sections of the population.	ITS Objective 5 stresses the need to ensure the transport network provides equal accessibility to all, including the elderly and disabled. Action PT5 identifies the need for improved accessibility to rail stations, including for the mobility impaired; however it is acknowledged that this could be made more explicit.	Review Action PT5.

72. Need for a further station on HS1 to serve Maidstone	<p>A new station should be built on HS1 on the A249 and should be served by 'Fastrack' bus services. The station should connect Maidstone, Ashford and Ebbsfleet and the main Nord/Pas de Calais centres.</p> <p>Maidstone only has a 'botched' limited connection to HS1 via the Medway Towns what is needed is a station the main HS1 line as it passes though the Borough to the north of Maidstone to provide an appropriate and proper connection.</p>	<p>This would be sited in the foreground of or within the Kent Downs AONB and thus have a significant environmental impact.</p> <p>Given the strategic nature of the route it is unlikely that a further station would be considered.</p>	No change
73. Fares should be reduced	High fares are a disincentive to travel	The need for good value flexible ticketing products is fully recognised, but the cost of travel by public transport needs to be fairly compared with that by private car, whose costs comprise more than the cost of fuel and parking. There is a need for better marketing of public transport options, as Action PT13 identifies.	No change
74. The horse-riding community	The strategy talks about vehicles, cycles and pedestrians but makes little or no mention of horse riders and equestrian needs. To ensure value for money new routes should be made as accessible to as many sections of the community as possible. Where ever improvements are provided for cyclists they should include equestrians too.	Comments noted.	Review ITS/Walking and Cycling Strategy actions to ensure that the interests of equestrians are explicitly considered.
75. Motor bike users	Then ITS makes no specific provision for motorbike users and could include measures like extra dedicated parking areas in the Town	Comments noted.	Review Actions P1 to P4 to consider the scope for dedicated PTW parking.

	Centre		
76. Traffic management/control systems	Traffic management systems should better regulated to ensure a smoother flow of traffic and less congestion. It currently seems as if they are not working effectively. Traffic lights could be turned-off or replaced by roundabouts	KCC has an Urban Traffic Management and Control system for Maidstone which optimises signal timings	No change
77. Maidstone should have a tram system	Other towns have discovered that modern trams can be very effective in both providing good transport systems and alleviating traffic congestion. It may seem a "Pie in the Sky" suggestion, but why not at least commission an investigation into the provision, perhaps utilising encouragement from Public Authorities and investment from Private companies	The total population of Maidstone and the density of development along the main road corridors will not generate a level of patronage sufficient to warrant the very high capital and operating costs of Light Rapid Transit during the Local Plan period. It could, however, be investigated in the longer term as a natural progression from bus priority corridors should these be delivered.	No change.
78. No further homes should be built until the measures set out in the ITS have been delivered	No more homes should be built until the council have improved the roads and invested in walk, cycle and bus alternatives. The inadequate parking space requirements set out by MBC for new build homes has caused our town to have a higher % of car owners than the national average. This must change.	Comments noted.	No change.
79. The priority should be to keep Maidstone moving	The priority should be to keep Maidstone moving. When Maidstone borough council charge 16 year old children £400 per year for a school bus pass they show that they encourage more car journeys. "Partners" cannot be expected to do the work the local council won't do.	Comments noted.	No change.

WALKING AND CYCLING STRATEGY

1. Action SWM1 Close North Pole Road for cycle route	i) Approval in principle for the proposal, subject to various safeguards for residents of the road.	Action SWM1 is an indicative proposal only. The Council will work with KCC to review the representations made and balance the needs of vehicle access against the desire to create an attractive walking, cycling and equestrian route.	Amend supporting text for Action SWM1, following discussions with KCC to develop a proposal which is considered suitable to progress to feasibility design and public consultation, subject to funding being secured.
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	<p>ii) Yes, the Proposal to Close North Pole Road to Through Traffic is an excellent suggestion. North Pole Road is extremely narrow and does not allow for cars to pass each other, when travelling towards each other, without one of the vehicles pulling off the tarmac and onto the mud / banks on one side or other. This manoeuvre is not always possible at the point where the cars are meeting each other, therefore often one vehicle must back up for 50 yards or whatever to find a convenient passing spot. Furthermore, as the speed limit is high (National Speed Limit) and the road has many twists and turns as well as frequent hills and dales (rather like a switchback) it is dangerous, with cars frequently finding that they are hurtling towards each other coming out of a bend....Without through traffic the road would be much safer for cyclists, horse riders, and groups of walkers, and runners, as well as bird-watchers; and additionally would provide a pleasant environment for passing through. The road does <u>not</u> provide a “short cut” in either direction, therefore does not serve a particular purpose when being used as a through road.</p>	<p>Action SWM1 is an indicative proposal only. The Council will work with KCC to review the representations made and balance the needs of vehicle access against the desire to create an attractive walking, cycling and equestrian route.</p>	<p>Amend supporting text for Action SWM1, following discussions with KCC to develop a proposal which is considered suitable to progress to feasibility design and public consultation, subject to funding being secured.</p>
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	<p>iii) There is a strong case for keeping North Pole Road / Barming Road open:</p> <ol style="list-style-type: none"> 1. The whole route from North Pole Road through to Barming Road into East Malling is regularly used as a cut-through, and not just by local residents. Vehicle numbers are set to increase as housing developments (and therefore traffic congestion) on Hermitage Lane increase. 2. Despite it being a narrow single track road with very few passing places, barely fit for purpose and totally unsuitable for HGVs, it provides an emergency route if the A26 is blocked between Barming and Watringbury. This in turn eases the increasing volume and speed of traffic on Malling Road through Teston. Alternatively, any potential for a 'quiet lane' / shared space / 20mph limit being put in place would never work because it would never be self-enforcing and is already a danger to cyclists, walkers and horse riders. It is narrow, winding and undulating, which presents a mere challenge to hasty drivers, particularly at night when headlights give an indication of oncoming vehicles, and during the winter when the branches are bare and marginally improve sight lines. There are serious concerns about the speed of traffic running the complete length of the road – "accidents waiting to happen". The strongest case is for closing the middle "uninhibited" section of North Pole Road i.e. the section between Mingulay at the Barming end and Brambledown / Parkwood Cottages just before Teston Corner:- 3. It would secure the safety of a valuable local natural space for families, cyclists, walkers and horse 	<p>Action SWM1 is an indicative proposal only. The Council will work with KCC to review the representations made and balance the needs of vehicle access against the desire to create an attractive walking, cycling and equestrian route.</p>	<p>Amend supporting text for Action SWM1, following discussions with KCC to develop a proposal which is considered suitable to progress to feasibility design and public consultation, subject to funding being secured.</p>
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	<p>riders to enjoy and to benefit from, at a time when surrounding green and open spaces in Barming and North West Maidstone are being developed and traffic congestion is increasing to intolerable levels. For this reason alone, the proposal must be brought forward: the 5 year timescale is far too long to wait.</p> <p>4. It would still allow access to properties at either end of North Pole Road to be maintained.</p> <p>5. Careful consideration of exactly where bollards are placed is essential. Whilst closure will prevent years of fly tipping and litter dumping along North Pole Road, it will be continue to be dropped at the bollards and cause nuisance to nearby properties. Stoppage/no through road signage will need to be very clear and give ample warning, because of insufficient turning space at the bollards for vehicles to turn round and go back.</p>		
	<p>iv) A cycle way route linking Upper Fant Road Maidstone to Kings Hill. The proposed access to Kings Hill is through the parish of Wateringbury. The Parish Council is annoyed at not having been consulted on this plan. The proposal is to use Barming Road, Red Hill and Teston Road. At the point of turning right from Red Hill to Teston Road is a bend with fast moving traffic and a danger to cyclists is a major factor at this point. The closure of North Pole Road to through motor traffic will push vehicles currently using this route on to the A26 adding to the congestion and pollution in Wateringbury.</p> <p>Any traffic to homes on the Maidstone side of the</p>	<p>Action SWM1 is an indicative proposal only. The Council will work with KCC to review the representations made and balance the needs of vehicle access against the desire to create an attractive walking, cycling and equestrian route.</p>	<p>Amend supporting text for Action SWM1, following discussions with KCC to develop a proposal which is considered suitable to progress to feasibility design and public consultation, subject to funding being secured.</p>

	<p>vehicle barrier will have travel via Wateringbury The agricultural traffic of the woodsmen will be forced to divert through Wateringbury as the main works are on the Wateringbury side</p> <p>Wateringbury Parish Council has been assured that no access of any kind would be allowed from our parish to Kings Hill. Therefore the inclusion of a cycle way to Kings Hill would negate the validity of the plan. Wateringbury Parish Council strongly objects to the cycle plan as proposed.</p>		
	<p>v) Closure of North Pole Road (to the north of Teston parish) to create a cycle route from Barming to Kings Hill. This road is, in effect, a country lane for the majority of its route which might be suited to becoming a 'quiet lane' with drivers encouraged to be more respectful of non-vehicle users. However, our Parish Council could not support the stopping up of this highway which on occasions has provided a necessary alternative route for diverted traffic during closures and emergencies on the A26. Additionally the homeowners of our parish who live in that road would be massively inconvenienced by a closure which, in our view, is not necessary simply to create a cycle route for the small number of cyclists who might be inclined to use it.</p>	<p>Action SWM1 is an indicative proposal only. The Council will work with KCC to review the representations made and balance the needs of vehicle access against the desire to create an attractive walking, cycling and equestrian route.</p>	<p>Amend supporting text for Action SWM1, following discussions with KCC to develop a proposal which is considered suitable to progress to feasibility design and public consultation, subject to funding being secured.</p>
	<p>vi) This is a great idea. Concern for a period of time about the increasing volume and speed of traffic using the road. North Pole Road is not only used by cyclists but also by walkers and horse riders too who access Oaken Woods.</p>	<p>Action SWM1 is an indicative proposal only. The Council will work with KCC to review the representations made and</p>	<p>Amend supporting text for Action SWM1, following discussions with KCC to develop a proposal which is considered suitable to</p>

		balance the needs of vehicle access against the desire to create an attractive walking, cycling and equestrian route.	progress to feasibility design and public consultation, subject to funding being secured.
	vii) Barming Parish Council comment regarding the Integrated Transport Strategy (Walking and Cycling Strategy) that the majority of members would like to see North Pole Road left open to vehicles.	Action SWM1 is an indicative proposal only. The Council will work with KCC to review the representations made and balance the needs of vehicle access against the desire to create an attractive walking, cycling and equestrian route.	Amend supporting text for Action SWM1, following discussions with KCC to develop a proposal which is considered suitable to progress to feasibility design and public consultation, subject to funding being secured.
2. Proposed route RMB2	The cycle route is unable to be read on the mapping. It appears to wander along steep lanes which are often running in mud. The edges of these road are notoriously badly maintained so especially at night and in the wet, cyclists may be tempted to swerve with dire consequences. The route must join the A229 at some point so cyclists will be expected to combat large lorries passing along this narrow A road with fast cars at 60mph and more. The route onwards to Cranbrook is no better. This route is unrealistic	Action RMB2 was identified from suggestions made by the Maidstone Cycle Forum. It does join the A229 between Clapper Lane and Chart Hill Road, but this is a distance of just 600m and the scope to mitigate potential cyclist/vehicle conflicts on this section will be investigated.	No change.
3. Lack of safe cycling routes in Staplehurst	Staplehurst has very few designated cycle routes. Whilst increased parking is proposed for the shops area it is not safe to cycle there.	Action RMB15 outlines the need to undertake an audit of pedestrian/cycle accessibility to key destinations in	No change.

		Staplehurst, to identify potential interventions to address local concerns. These could include measures identified in the Neighbourhood Plan.	
4. PROW KM52 (Kirkdale Road to Kirkdale/Loose village) Action SEM2	Object to this stretch of cycle path scheme, as it does not demonstrate MBC's commitment to properly protecting Loose valley and village. Due to the damaging environmental and visual impact it will have. The protection of footpath KM52 should be an integral and crucially important part of this commitment. The cycle path scheme contravenes the stated objectives, policies and principles of the Local Plan and should be expunged from the Draft Integrated Transport Strategy	Action SEM2 is fully consistent with draft Local Plan Policy DM24 (Sustainable Transport). Walking and cycling improvements are an essential element of managing demand on the transport network, including on the A229 Loose Road. The environmental and visual impacts of the scheme will be mitigated to a level far outweighed by the benefits delivered.	No change.
5. RMB7 Barming to Yalding Towpath Cycle Route	Extension of the Medway Towpath Scheme from Barming to Yalding. We do not believe the Borough Council has given any consideration to the impact of an extension on agricultural landowners / cattle grazing. The River Medway winds through land that is used for these purposes and therefore the effect on farming is a serious issue. Our experience suggests that cyclists do not like gates / stiles and do not treat them reasonably yet they are necessary for the security of grazing animals. Creating cycling routes would increase public liability risks in these	Action RMB7 was identified from suggestions made by the Maidstone Cycle Forum. Para. A.77 stresses that all Strategy proposals are indicative only. Early engagement with landowners and other stakeholders would of course form part of the	No change.

	scenarios and hence an increased insurance cost to landowners. These are matters about which Maidstone Borough Council has failed to engage.	feasibility stage, subject to securing necessary funding.	
6. Cycle routed to Rural Service Centres and Transport Hubs	The emphasis on improved cycle routes to rural service centres and transport hubs such as Marden is welcomed (Objective 1A, Actions C1, C2, PT5, RMB3, RMB8 and RMB14).	Support noted.	No change.
7. Measures and proposals don't go far enough and more could be done	<p>Support all the measures and individual proposals in the detailed appendix and all the proposed routes, a large number of which we note were proposed by the forum. Believe that these would be enhanced with the addition of the following:</p> <p><u>NEW ADDITIONAL CYCLE ROUTES and LINKS</u></p> <p>These are proposed to link up existing well used routes by cyclists to give them more protection</p> <p>HIGH STREET</p> <ol style="list-style-type: none"> 1. County Road to Station Road 2. Link between River and Priory Road 3. Allow cycle access onto quiet roads from the River 4. Week Street to Staceys Street 5. Fairmeadow to High Street 6. King Street to Chancery Lane - Shared use path and crossings need upgrading, completely unsuitable for purpose 7. St Lukes Road to Wheeler Street 8. Alley between College Road and Brunswick Street 9. Make legal to cycle and provide suitable crossing into College Road 	<p>The measures and proposals in the Walking and Cycling Strategy with respect to the Maidstone urban area have been selected with the primary objective of "filling in the gaps" in the short term. This is considered essential in the context of funding which is likely to be limited. However, the additional schemes will be considered on their merits and incorporated within the Action Plan where appropriate, as longer term schemes if necessary.</p> <p>The benefits to cyclists of road closures and contraflows are recognised. However, their technical and political</p>	<p>Liaise with KCC to review suggestions and incorporate additional measures in the Walking and Cycling Action Plan as deemed appropriate.</p>

	<p>10. Union Street to Vinters Road - Remove need to dismount or cycle on main road by providing proper crossing here</p> <p>11. MTC8 High Level Railway Bridge – excellent proposal for shared use, eastern path would need widening. However this would create a very useful link between the two sides of town as well as linking Maidstone East and Maidstone Barracks stations.</p> <p>12. Out of Mote Park - Improve access, currently very difficult to use on bicycle with dangerous road crossing.</p> <p>HEATH and FANT</p> <ol style="list-style-type: none"> 1. St Andrews Road to Queens Road 2. Link between Bower Mount Road and St. Michaels Road 3. Removes need to cycle for short section on Tonbridge Road - Shared use pavement may work in the short term, but is not a long term solution <p>BRIDGE and FANT</p> <ol style="list-style-type: none"> 1. Cornwallis Road to Bedford Place 2. Make current footpath into dual use so as to link Oakwood Park Area to London Road, providing a safer route towards the town centre 3. Fant to Maidstone West Station 4. Badly needed to enable people to cycle from Fant into the town centre. Shared use would be a good short term measure, but is not a long term solution <p>ALLINGTON</p> <ol style="list-style-type: none"> 1. Headingley Road to Juniper Close 	<p>deliverability must be carefully considered. As the Strategy is a living strategy, there is the flexibility to bring forward these measures via the monitoring and review process as changing circumstances allow.</p>	
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	<ol style="list-style-type: none"> 2. Remove gate and allow cycling 3. Access from segregated path to Beaver Road 4. Poplar Grove, ensure that cycle lanes on both sides of the road become mandatory and also get double yellow lines, most of the time the lanes are blocked on both sides, forcing bikes out into the main carriageway. <p>NORTH</p> <ol style="list-style-type: none"> 1. Improve linkages out of Whatman Park across Medway to Ringlestone 2. Replace stairs with ramp to allow cycling, on bridges across Medway to Whatman Park 3. Saxons Drive - Cycle route currently has steps. These should be replaced with a ramp <p>SOUTH/ SHEPWAY NORTH</p> <ol style="list-style-type: none"> 1. Link between Cranbourne Avenue and Pheasant Lane <p>BARMING/ WEST FARLEIGH</p> <ol style="list-style-type: none"> 2. North Street/ South Street/ Barming Bridge/ St Helen's Lane/ Kettle Lane 3. This provides an excellent route from Barming and West Maidstone to the Countryside and the Weald, it should be adopted as a signed cycle route. <p>BEARSTED</p> <ol style="list-style-type: none"> 1. Path from Parish Church south to Ashford Road (A20), this is a wide footpath, with minor improvements it can be a good dual use route providing a good link towards Bearsted Green and the railway station from south east Bearsted. <p><u>ROAD CLOSURES</u></p> <p>There is a lot of evidence from Boroughs that have</p>		
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	<p>done it , that Road Closures can be used to help vastly improve routes for cyclists, as well as pedestrians and improve road safety generally. A number of strategic road closures in Maidstone could enhance cycling, but also help to work on areas for residential speed reductions. We have listed these in priority order and would, welcome a commitment to implement them all, but initially perhaps carry out up to 10 pilot road closures. Our proposals include:</p> <p>HEATH</p> <ul style="list-style-type: none"> • Oakwood Road - Remove rat run, make road safer for cycle and residents <p>BARMING</p> <ul style="list-style-type: none"> • We fully support the courageous proposal to make a road closure along North Pole Road - Making a closure to road traffic except pedestrians and cyclists would create an excellent safe route from Kings Hill/ Teston/ Malling to Barming and Maidstone, through road traffic can use the parallel A26 Tonbridge Road. This will link with the proposals for North/ South Streets as well as the Fant Farm Route described below. <p>BRIDGE</p> <ul style="list-style-type: none"> • Buckland Road -This would be one of the most important road closure. Through route removed for motor vehicles, cyclists only through closure. Would massively improve route 12. <p>WEST FARLEIGH</p> <ul style="list-style-type: none"> • Kettle Lane - Making a closure to road traffic except pedestrians and cyclists would create 		
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	<p>an excellent safe route from Barming to West Farleigh and the Weald, climbing a hill in safety, Through road traffic can use the parallel Charlton Lane and Gallants Lane</p> <p>HIGH STREET</p> <ul style="list-style-type: none"> • Wheeler Street • Closing Wheeler Street to through motor traffic would improving cycling conditions in the whole area by removing rat running. Could also be closed at the junction with the B2012, with traffic lights for cyclists as an alternative • Queen Anne Road - Closing this end to motor traffic would stop this being used as a rat run for through traffic, and create a cycle friendly street • Upper Road - Remove rat running • Lower Road- Remove rat running, Exemption for buses • Hastings Road - Remove through traffic to make road safer for children at Maidstone Grammar School, Exemption for buses <p>ALLINGTON</p> <ul style="list-style-type: none"> • Hyde Road - With exemption for buses • Hildenborough Crescent - To remove through traffic completely, Exception for buses. Consider closure at London Road or Castle Road • Ash Grove - To remove through traffic completely <p>LOOSE/ SOUTH</p> <ul style="list-style-type: none"> • Cripple Street/ Teasaucer Hill • A road closure just before Bockingford Lane 		
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	<p>will make this a much safer environment than currently. Cripple Street, Cave Hill links well to the Medway Route at Tovil Bridge, providing a linkage towards Boughton Monchelsea.</p> <p><u>CYCLING ON PEDESTRIANISED STREETS</u></p> <p>Across the borough there are a number of pedestrianised streets and bridges. If these were dedicated for dual use, which we note is the County Council's preference rather than segregated routes, then strategic routes would be opened up and significant improved use could be made of the Medway Towpath Cycle Route. These proposals include</p> <p>RIVER MEDWAY CROSSINGS</p> <ol style="list-style-type: none"> 1. Barming Bridge - This footbridge should be a permitted cycle route, promoting cycling to the Medway from both Yalding and West Farleigh and Barming areas. 2. Tovil Bridge - This footbridge should be a permitted cycle route, it forms part of a main route between Fant and Tovil 3. Allington Lock - Whilst the bridge over the weir is dual use, the path over the lock gates should clearly be signed as dual use <p>In the Town Centre we have two proposals</p> <ol style="list-style-type: none"> 1. Week Street - HGVs are allowed here between 5:30pm and 10:30pm. Why can't two way cycling be allowed too, at the very least only during this times, and ideally at all times. 2. Earl Street - HGVs are allowed here between 5:30pm and 10:30pm. Why can't two way 		
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	<p>cycling be allowed too, at the very least only during this times, and ideally at all time</p> <p><u>CONTRA FLOW CYCLING</u></p> <p>Short stretches of contraflow cycle lanes have demonstrated in Maidstone and elsewhere the ability to considerably improve cycling and cycling linkages. We would recommend the following are adopted:</p> <p>HIGH STREET</p> <ul style="list-style-type: none"> • Bank Street - Cycling is already allowed Eastbound, why not Westbound as well? • Church Street/Marsham Street - Roads would be wide enough to allow contraflow cycling • Queen Anne Road <p>NORTH</p> <ul style="list-style-type: none"> • Perryfield Street • Albert Street • Peel Street <p>ALLINGTON and HEATH</p> <ul style="list-style-type: none"> • Buckland Lane - To provide access to Route 12 without the narrow shared use path • Marigold Way <p>SHEPWAY NORTH and EAST</p> <ul style="list-style-type: none"> • Plains Avenue • Vinters Road <p><u>MAIDSTONE TOWN CENTRE GYRATORY SYSTEM</u></p> <p>We would recommend that once the new traffic system is implemented that on an pilot experimental basis the North lane (left) on the Bazalgete Bridge is conned off for cycling use only to help link the town centre to west Maidstone, this will not significantly impact on traffic as there will still be three lanes left</p>		
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	<p>for a reduced amount of traffic.</p> <p>We would also recommend that the underpass to the bottom of the High Street and across the Broadway are left open as they contribute significantly to safe segregated pedestrian and cyclists access to the town centre from the west of Maidstone.</p> <p><u>OTHER MEASURES</u></p> <p>Priority traffic signals, we would like to see traffic signals with cyclist phasing and advance stopping lines incorporated at all major junctions across the borough.</p> <p>HIGH STREET –</p> <p>Replace signals with zebra Junction King Street/ Wyke Manor Road, giving pedestrians’ priority will reduce delays for pedestrians, and mean that cyclists do not have to stop for red lights during non-busy times.</p> <p>FANT/ HEATH –</p> <p>Fant Lane/ Tonbridge Road - Fant Lane Right Turn Exemption for cyclists - Exempt cycles from the right turn ban out of Fant Lane, to allow better access to Queen's Road</p> <p><u>NEW CYCLE TRACKS</u></p> <p>NORTH/ HIGH STREET/ FANT/ BARMING</p> <p>The Medway Towpath</p> <p>This excellent scheme is fully supported, although as a second stage we would like to see a segregated pedestrian and cycling facilities provided. There is easily sufficient space from Lockmeadow to Barming Bridge to provide a 3m two way cycle track and an adjacent footpath, there is scope in this stretch to make a high quality statement route.</p>		
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	<p>As part of the route dual access must be made for Barming, Tovil, Millennium Bridges and full cycling access to the Allington Lock area. This route will provide an important route linking Maidstone Town Centre to residential areas and will provide a safe and attractive alternative to the A26 Tonbridge Road which is a dangerous road for cycling along, especially from St Michaels Road/ Bower Mount Road to the town centre. It will also allow cyclists to avoid the gyratory system.</p> <p>ALLINGTON</p> <ul style="list-style-type: none"> Giddyhorn Lane - Upgrade surface and width to create cycle access from Maidstone Hospital and Allington to Route 12 <p>HEATH/ ALLINGTON</p> <ul style="list-style-type: none"> Hermitage Lane - Two way cycle track along Hermitage Lane, this should extend from Marigold Way all the way on the eastside as far as the A20 London Road in Aylesford, and will require co-operation with Tonbridge and Malling Council. <p>NORTH</p> <ul style="list-style-type: none"> Lock Lane Sandling - The road up from Allington Lock by Kent Life should be opened for cycling only, it is currently blocked off Forstal Road, Sandling - The cycle track on the dual use pavement should be extended from where it stops, over the M20 Road Bridge to Cobtree Manor <p>FANT</p> <ul style="list-style-type: none"> Unicomes Lane - This Private Road should be made up as a cycle track to line Fant to the 		
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	<p>Medway River Cycle Highway</p> <ul style="list-style-type: none"> Fant Farm – We fully support the proposals for the route here. The current Private Road/ Public Footpath from Upper Fant Road/ Hackney Road to Farleigh Lane should be made into a dual use path with a properly surfaced cycle track. This will provide a convenient access to East Farleigh station and also can link with the footpath from Rectory Lane to South Street. This would be an alternative higher up the valley to the Medway route which will be susceptible to periodic flooding, also providing improved access to attractive Countryside adjacent to Fant and Barming. <p>AYLESFORD London Road missing link - fix the missing link between two segregated cycle routes</p> <p><u>RURAL LINKAGES</u></p> <p>We support the concept of quiet lanes as are provided in East and West Malling, these serve to provide safe environments for cyclist and non-motorised transport. We want to work with the two Councils to provide a set of cycle routes in the rural areas to provide north-south and east-west routes away from “A” and “B” roads. The current proposal for a North-South route in Staplehurst Town to the west of the main A229 provides an excellent example.</p>		
<p>8. General comments on proposed measures</p>	<p>In paragraph A.36 it may be helpful to acknowledge that topography is also likely to be a constraint in some locations;</p> <ul style="list-style-type: none"> The targets quoted in A.42 will need to be 	<p>The VISUM model cannot directly model the impact of walking and cycling improvements, but</p>	<p>Amend text in paragraphs A.36 and A.68</p>

	<p>reconciled against the assumptions underpinning the VISUM traffic modelling;</p> <ul style="list-style-type: none"> • The text supporting Action C.11, in particular paragraph A.68, should reference the Kent Design Guide where detailed guidance is provided regarding designing streets for pedestrians and cyclists; • The traffic related implications of the road closure referenced in SWM1 (North Pole Road) would need to be understood and potentially mitigated before such a proposal could be deemed acceptable by KCC as Local Highway Authority; and • The timescales attributed to NEM1 and NEM2 are subject to restrictive clauses within the existing S106 Agreement. 	<p>scenario DS4b simulated these by reducing the number of forecast short car trips (i.e. less than 5km) within the urban area in the year 2031 by 6%. The actual number of trips will be confirmed, but the VISUM model will have included all trip purposes and not just travel to work which is the subject of the targets in A.42.</p> <p>The traffic related implications of Action SWM1 will depend on the details of the proposal, and the Council will work with KCC to identify a scheme which mitigates these.</p>	
9. Cycle Parking	There is no mention of the need for increased secure and convenient cycle parking to cater for all the expected new cyclists.	Comment noted.	Review Strategy references to cycle parking and clarify if necessary.
10. Cycle Lanes	Is provision of these practical where roads are narrow?	All Strategy proposals are indicative only at this stage. They would be designed in accordance with published highway	No change.

		design guidelines and would be subject to Road Safety Audit as part of this process.	
11. Safe pedestrian routes	You need to put safe crossings in for people first eg Old Tovil Rd close to Sheals Crescent major walk route, people have to cross on a blind bend. Sittingbourne Rd by queen Anne pub another blind crossing. If you can't even put decent crossings in for people it seems unlikely people will want to walk as it is so dangerous.	Upgraded crossing facilities by the Queen Anne public house are identified in Action MTC2. The justification for formalised crossing facilities to link Old Tovil Road across the A229 will be considered as part of Action W4.	No change.

Strategic Planning, Sustainability & Transportation Committee	14 June 2016
Is the final decision on the recommendations in this report to be made at this meeting?	Yes

Response to Kent County Council’s Active Travel Strategy Consultation Draft

Final Decision-Maker	Strategic Planning, Sustainability & Transportation Committee
Lead Head of Service	Rob Jarman: Head of Planning & Development
Lead Officer and Report Author	Steve Clarke: Principal Planning Officer Spatial Policy
Classification	Public
Wards affected	All

This report makes the following recommendations to this Committee:

1. Members agree the proposed response to the consultation set out in paragraphs 4.2.1 to 4.2.6 of the report and that it be forwarded to Kent County Council (“KCC”) prior to the close of the consultation period on 13 July 2016.

This report relates to the following corporate priorities:

- Keeping Maidstone Borough an attractive place for all and;
- Securing a successful economy for Maidstone Borough –

The promotion of Active Travel and delivery of associated infrastructure has benefits not only in terms of public health through a potentially fitter and healthier population and workforce that is less reliant on medical services, for example, but also in supporting a greater choice of travel mode and a reduction in reliance on the use of the private car as a means of personal transport.

Timetable	
Meeting	Date
Strategic Planning, Sustainability & Transportation Committee	14 June 2016

Response to KCC's Active Travel Strategy Consultation Draft

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 On Wednesday 18 May 2016, KCC launched a consultation draft of its emerging Active Travel Strategy. The consultation period runs until Friday 13 July 2016. The draft Strategy and appendices is attached at Appendix One. The accompanying Equality Impact Assessment (EqIA) is attached at Appendix Two.
 - 1.2 This report considers the draft Active Travel Strategy, its accompanying documents and questionnaire and proposes a response which Councillors are requested to approve for transmittal to KCC prior to the closure of the consultation on 13 July 2016.
-

2. INTRODUCTION AND BACKGROUND

- 2.1 In conjunction with stakeholders across the County, KCC has been developing an Active Travel Strategy for the promotion of physically active means of transport as part of its 'vision for making cycling and walking the preferred option for residents taking short journeys or as part of longer journeys that include public transport'¹.
- 2.2 The Strategy seeks to demonstrate how KCC will build on the existing network of cycle and walking routes in the County to maximise their use and to promote increased walking and cycling in a population with a growing reliance on cars. The aim is to promote a range of infrastructure and behaviour change projects via an implementation plan that will be finalised once the Strategy has been adopted.
- 2.3 Prior to the publication of the Strategy and to inform its content, KCC worked with various communities, stakeholders and the Kent County Youth Council across the County and also held two pre-consultation engagement workshops, as well as taking into account recommendations of health bodies, charities, central government departments and a range of other sources.
- 2.4 Active Travel has been defined as Walking or Cycling as a means of transport in order to get to a particular destination such as work, the shops or to visit friends. For example, in the Active Travel (Wales) Act 2013 an active travel journey is defined as '*a journey made to or from a workplace or educational establishment or in order to access health, leisure or other services or facilities*'².

¹ Foreword to KCC Active Travel Strategy Consultation Draft 2016

² http://www.legislation.gov.uk/anaw/2013/7/pdfs/anaw_20130007_en.pdf

2.5 It does not cover walking and cycling done purely for leisure, for health reasons or simply walking the dog and it can apply to a complete journey or parts of a journey.

2.6 There are both barriers to active travel and also benefits arising from it.

2.7 Barriers include:

- Lack of suitable routes between home and community facilities, work schools etc.
- Not enough promotion of existing routes
- Lack of facilities such as secure lockers and parking
- Obstacles in cycle lanes and on footways
- Lack of feeling safe when walking or cycling
- Convenience of using a car when carrying bulky goods or shopping
- The need to make linked trips such as dropping children to school on the way to work

2.8 Benefits include:

- Greater physical activity; this has clear health benefits through a reduced risk of developing diabetes, heart disease and other preventable conditions
- Active Travel is incorporated into and can be an integral part of a regular daily routine and thus reduces the need to find extra time or money for exercise
- Cheaper travel; saving money on fuel costs, parking charges and vehicle running costs
- A reduction in the number of vehicles on the road and thus an improvement in air quality
- Quicker journeys can be made as walkers and cyclists can use routes not available for motor vehicles

2.9 The draft KCC Strategy has one overarching ambition; to

'Make active travel an attractive and realistic choice for short journeys in Kent'

Delivery of the ambition will lead to improved health through an increase in physical activity, reduced congestion on the highway network by providing better travel choices and safer active travel.

2.10 Three actions seeking to deliver the above will be pursued:

1. Integrate Active Travel into planning
2. Provide and maintain appropriate routes for Active Travel
3. Support Active Travel in the community

2.11 In terms of Action 1, it is indicated that the Strategy will influence commissioning decisions and ensure walking and cycling are prioritised in future planning processes thus encouraging integration of all types of transport as part of the strategic (County) road network and will be delivered through current commissioning guidance and best practice, existing KCC, as well as key partners', policies and strategies and a commitment to encouraging Active Travel.

Delivery mechanisms include the following:

- Inform the development and application of KCC's transport policies through the Local Transport Plan
- Support district and borough councils to ensure that Active Travel is used to deliver sustainable growth and development through local plans and in determining planning applications
- Use the principles and ambitions of KCC's Active Travel Strategy to influence partner policies and strategies such as the Council's draft ITS and associated Walking and Cycling Strategy
- Work with developers to ensure Active Travel routes are a priority, both within developments and linking sites to other services, community facilities and transport hubs
- Work with developers to secure sufficient areas within developments for green spaces and attractive routes and environments that encourage Active Travel
- Work with strategic transport providers to deliver infrastructure that supports Active Travel.

2.12 To achieve Action 2, the aim is for Kent to have fit-for-purpose Active Travel routes that people want to use. Existing routes have developed in a piecemeal manner over time as resources have allowed and are not always continuous or direct or may not serve important community facilities. This has disenfranchised some potential users. It is important therefore to provide, for example, pedestrian crossings along routes and secure cycle storage at destinations. Routes should also be well maintained.

Delivery mechanisms include the following:

- Give appropriate consideration to Active Travel when designing new routes and maintaining highway assets
- Maintain the public highway, Public Rights of Way (PRoW), and Active Travel resources such as signage to enable safe and effective Active Travel
- Work in partnership with key organisations both within and neighbouring Kent to identify and prioritise new Active Travel routes and any maintenance issues on the existing Active Travel network
- Ensure that Active Travel improvements to the highway and PRoW network are made in places where there is an evidenced need and where they are supported by local demand and resource
- Make reasonable adjustments to Active Travel route design to maximise the inclusivity and accessibility to all users
- Support improvements to the local environment in and around schools, hospitals and other public buildings to provide opportunities to cycle or walk all year-round, including appropriate surfacing, cycle storage and lockers
- Evaluate funding for Active Travel infrastructure and maintenance and proactively seek additional funding
- Support KCC's Casualty Reduction Strategy in delivering key routes to address road safety issues for vulnerable road users.

2.13 Action 3 would be achieved by encouraging and promoting Active Travel in the community and providing the motivation for people to make Active Travel their preferred choice.

Delivery mechanisms include the following;

- In schools, further and higher education:
 - support initiatives including School Travel Plans and other Active Travel programmes
 - support training for pedestrians and cyclists and support the development of independent travel training programmes.

- In workplaces:
 - support businesses in developing Active Travel plans and provide information to support Active Travel in the workplace
 - develop Active Travel provision within KCC to enable Active Travel by council staff; KCC should lead by example.

- In health services:
 - work with health professionals to promote Active Travel and provide support to increase levels of Active Travel
 - develop methods of including information on Active Travel in all physical activity advice given by health professionals
 - integrate walking and cycling for travel purposes into public health services and commissioning processes.

- In communities:
 - develop and maintain recreational routes as a means of introducing people to Active Travel
 - support road safety initiatives for all road users, especially the most vulnerable such as cyclists and pedestrians
 - promote locally-based programmes to encourage walking and cycling, and integrate Active Travel as part of longer journeys involving public transport.

2.14 KCC has also considered the issue of funding the strategy. It indicates that Active Travel initiatives are funded from a number of different sources and budgets with priorities set within the Local Transport Plan for Kent and other corporate strategies. It notes that Government funding allocated to KCC has decreased and is likely to continue to do so as government budgets are also under pressure.

2.15 However, it is anticipated that opportunities will arise. Previously, KCC has been successful with bids for specific government grants such as to the Local Sustainable Transport Fund, through which grants have been made to schools and businesses. Recent announcements of further funding allocations and opportunities, as outlined in the National Cycling and Walking Investment Strategy³, will support the delivery of the Active Travel Strategy. These funding streams include Bikeability; the Access Fund; the Local Growth Fund and the Integrated Transport Block. It is also envisaged that the Strategy will also support the proposed development of Ebbsfleet as a NHS Healthy New Town.

³ www.gov.uk/government/uploads/system/uploads/attachment_data/file/512895/cycling-and-walking-investment-strategy.pdf

2.16 The Strategy itself is stated to be a key element in supporting the sourcing of external funding to promote Active Travel in Kent as well as seeking Active Travel network improvements through building development funding and also provide KCC with a platform to engage with partners and extend and support public/private partnerships that aim to promote and support Active Travel initiatives and investment. Working in partnership will be vital to the success of the Strategy.

3. AVAILABLE OPTIONS

- 3.1 There are two options open to Councillors: to either respond or not respond to the consultation.
- 3.2 Not responding will deny the Borough Council the opportunity to make its views known to enable them to be taken into account as KCC develops the Strategy further in the coming months.
- 3.3 Responding will, of course, provide the Borough Council with an opportunity to make KCC aware of its views.
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4. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS

- 4.1 The preferred option is for the Borough Council to respond to the consultation.
- 4.2 In responding as an organisation, the consultation questionnaire requires responses to the following questions. The suggested responses are set out below each question:

4.2.1 Q: Was the Active Travel Strategy easy to understand? *Yes/No/Don't know*

A: Yes. The Strategy provides a high-level view of the issues and as such is not complicated or too detailed.

4.2.2 Q: To what extent do you agree or disagree with the Active Travel Strategy's ambition to make 'active travel an attractive and realistic choice for short journeys in Kent'? *Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree/Don't know*

A: The Borough Council strongly agrees with the stated ambition of the Strategy. Not only would the result be improved fitness and health for the population engaged in Active Travel, but also there would be benefits for the local road network in the Borough as many short journeys currently made by the private car would be subject to modal shift towards walking and cycling. The promotion of Active Travel has a direct link with the objectives of the Integrated Transport Strategy and its associated Walking and Cycling Strategy and the Maidstone Borough Local Plan. Through these documents, the Borough Council is seeking to encourage modal shift towards Active Travel modes and the use of public transport to promote sustainable development and transport in accordance with guidance in the NPPF and the NPPG.

4.2.3 Q: To what extent do you agree or disagree with the measures outlined in Action 1: Integrate active travel into planning? *Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree/Don't know*

A: The Borough Council strongly agrees that Active Travel should be integrated into planning. The potential benefits of Active Travel for health and also its impact on movements on the local highway network generally are well recognised. The encouragement of modal shift away from reliance on the use of the private car which, through promotion, Active Travel can play a significant role in, is a vital component of a sustainable transport policy and the delivery of sustainable development.

As indicated above, Active Travel has a direct link with the objectives of the Integrated Transport Strategy and its associated Walking and Cycling Strategy and the Maidstone Borough Local Plan. Through these documents, the Borough Council is seeking to encourage modal shift towards Active Travel modes and the use of public transport to promote sustainable development and transport in accordance with guidance in the NPPF and the NPPG. The commitment to 'support district and borough councils to ensure that active travel is used to deliver sustainable growth and development through local plans and in determining planning applications' is therefore also welcomed.

4.2.4 Q: To what extent do you agree or disagree with the measures outlined in Action 2: Provide and maintain appropriate routes for active travel? *Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree/Don't know*

A: The Borough Council strongly agrees that appropriate routes to support Active Travel should be provided and maintained, for the reasons given earlier relating to the recognised potential health benefits and the potential relating to the encouragement of modal shift. The Borough Council is seeking to deliver key walking and cycling route improvements as part of the Integrated Transport Strategy in support of the submitted Maidstone Borough Local Plan.

4.2.5 Q: To what extent do you agree or disagree with the measures outlined in Action 3: Support active travel in the community? *Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree/Don't know*

A: The Borough Council strongly agrees with the outlined measures. Encouraging Active Travel across as many sections of the community as possible and also in the workforces around the County will assist in increasing acceptance and take-up of Active Travel and the change in attitude/perception that is required.

For example, the Borough Council works and will continue to work closely with the Maidstone Cycling Campaign Forum as part of the actions set out in the Integrated Transport Strategy to promote cycling within the Borough.

All potential methods of encouraging Active Travel should be considered. A key to this is the need for partnership and close-working with other organisations that can promote the Active Travel agenda perhaps as part of a wider public health remit, for example. Organisations such as Intelligent Health ⁴ based at Reading University, promote physical activity on health grounds and can evidence the benefits of working with communities to encourage them to be more active. They organise a mass participation community event in the form of an interactive game called 'Beat the Street' which encourages people to get out and about and be more physically active in their communities. Evidence from the events held demonstrates that participants continue their activity after the game ceases and that there is a marked take-up in increased activity⁵.

It is important that KCC works with all partners to promote Active Travel in its many forms.

4.2.6 KCC has also asked for comment on the EqIA that has been undertaken. The document recognises that the promotion of Active Travel will not benefit all sections of the community equally, particularly the less mobile. It also recognises, for example, the need to promote the Strategy in such a way that is inclusive and will encourage all sections of the community, e.g. evidence suggests that fewer women cycle than men. The EqIA has not omitted any significant factor in its assessment and it forms a sound basis to test individual measure in the Strategy against.

5. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION

5.1 The agreed response will be forwarded to KCC prior to the deadline of 13 July 2016.

6. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
Impact on Corporate Priorities	The promotion of Active Travel and delivery of associated infrastructure has benefits not only in terms of public health through a potentially fitter and healthier population less reliant on medical services but also in supporting a greater choice of travel mode and a reduction in reliance on the use of the private car as a means of	Rob Jarman: Head of Planning & Development

⁴ <http://www.intelligenthealth.co.uk/>

⁵ <http://www.intelligenthealth.co.uk/evidence/>

	personal transport.	
Risk Management	No specific implications arise from this report	Rob Jarman: Head of Planning & Development
Financial	No specific implications arise from this report	Head of Finance & Resources
Staffing	No specific implications arise from this report	Rob Jarman: Head of Planning & Development
Legal	No specific implications arise from this report	Kate Jardine Planning Team Leader Mid Kent Legal Services
Equality Impact Needs Assessment	An EQIA has been undertaken by KCC. This will be further reviewed during and following consultation as the Active Travel Strategy moves forward. The EqIA indicates that the less mobile sections of the population, such as older residents, may benefit less from the Strategy overall.	Anna Collier Policy & Information Manager
Environmental/Sustainable Development	The promotion of Active Travel and delivery of associated infrastructure has benefits not only in terms of public health through a potentially fitter and healthier population less reliant on medical services but also in supporting a greater choice of travel mode and a reduction in reliance on the use of the private car as a means of personal transport.	Rob Jarman: Head of Planning & Development
Community Safety	The promotion of Active Travel and delivery of associated infrastructure has benefits not only in terms of public health through a potentially fitter and healthier population less reliant on medical services but also in supporting a greater choice of	Rob Jarman: Head of Planning & Development

	travel mode and a reduction in reliance on the use of the private car as a means of personal transport.	
Human Rights Act	No specific implications arise from this report	Rob Jarman: Head of Planning & Development
Procurement	No specific implications arise from this report	Rob Jarman: Head of Planning & Development & Head of Finance & Resources
Asset Management	No specific implications arise from this report	Rob Jarman: Head of Planning & Development

7. REPORT APPENDICES

The following documents are to be published with this report and form part of the report:

- Appendix 1: Kent County Council Active Travel Strategy Consultation Draft and Appendices
- Appendix 2: Equality Impact Assessment of Draft Active Travel Strategy

Active Travel Strategy

Consultation Draft



Have your say

Find out our priorities for Active Travel in Kent
and tell us your views on our draft Strategy

kent.gov.uk/activetravel
Consultation closes 13th July 2016



To view the full Strategy including Annexes and supporting information please go to kent.gov.uk/activetravel

Complete the questionnaire on page 11 or visit kent.gov.uk/activetravel

Foreword

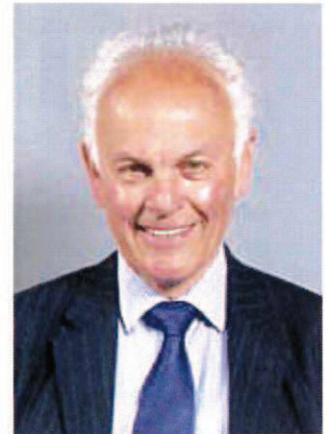
Active Travel – journeys made using physically active means of transport – can bring many benefits to health and wellbeing, the economy and the climate. Kent faces a number of challenges in coming years, and declining levels of physical activity and an increase in traffic on the roads are two that will have a major impact on the life of residents in the county. This draft Strategy sets out Kent County Council's vision for making cycling and walking the preferred option for residents taking short journeys, or as part of longer journeys that include public transport.

Kent already has a number of cycling and walking routes across the county, from those with international and historical significance to the local routes that provide a connection between Kent residents and local shops, parks and services. These include the picturesque North Downs Way, Greensands Way, the historic Crab & Winkle trail, the Viking Coastal Trail and the Saxon Shore Way, the national cycle routes connecting the UK to the continent, and the miles of cycle lanes and pedestrian routes that provide a vital transport network for local journeys.

This draft Active Travel Strategy proposes how we will build on these assets, maximise use of the existing network, and address the challenges we face in increasing walking and cycling in a population with a growing reliance on cars. A range of infrastructure and behaviour change projects will contribute towards achieving success, and an implementation plan will follow to deliver the ambitions and objectives outlined within.

This draft Strategy also sets a direction for partnership working across the county, as public sector spending cuts mean that this Strategy needs to maximise current investment, deliver value for money and realise benefits across a range of partners.

The development of this Active Travel Strategy has been informed by engagement with stakeholders, communities and the Kent Youth County Council, and by following recommendations set down by health bodies, charities, government departments and a range of other sources. It has also been guided by cross-party elected members of Kent County Council. I am grateful to all those who have helped to inform the content of this draft Strategy.



Clive Pearman
*Deputy Cabinet Member for
Environment and Transport
Kent County Council*

Introduction

Kent County Council's (KCC) Active Travel Strategy aims to make active travel an attractive and realistic choice for short journeys in Kent. By developing and promoting accessible, safer and well-planned active travel opportunities, this Strategy will help to establish Kent as a pioneering county for active travel.

Active Travel means walking or cycling as a means of transport, in order to get to a particular destination such as work, the shops or to visit friends. It does not cover walking and cycling done purely for pleasure, for health reasons, or simply walking the dog.¹

Active travel can be for complete journeys or parts of a journey, and more people in the community making more active travel journeys can lead to a range of positive individual and shared outcomes. These include improved health, reduced traffic congestion, reduced pollution and financial savings to the individual.

In the current climate of reduced budgets, this Strategy will provide a basis on which KCC will be able to prioritise internal resources, influence how new communities are developed and to support bids for external funding for a range of active travel measures. It will also support local initiatives to promote active travel within the county.²



Benefits of Active Travel

Being more physically active can benefit everyone and can lower the chances of developing diabetes, heart disease and other preventable conditions.³ Active travel gives people an opportunity to be physically active as part of their daily routine and incorporating physical activity into everyday tasks reduces the need to find extra time or money for exercise. It can also make it cheaper to travel by saving on fuel, vehicle running costs and parking charges.

Making shorter journeys using active travel helps to reduce the number of vehicles on the road and improve air quality. It can also be quicker, as in urban areas journey times are often shorter when walking or cycling as users can take advantage of routes not accessible to motor vehicles.

Investment in active travel can also deliver economic benefits; in a time of restricted public spending active travel is affordable and delivers value for money in achieving health, transport and wider policy objectives.



Barriers to Active Travel

Feedback from Kent residents and organisations⁴ shows that the main reasons for not making short journeys using active travel are a lack of suitable routes between homes and community services, workplaces or schools, and not enough promotion of existing routes. Other issues include a lack of facilities such as lockers and secure parking, obstacles in cycle lanes and in footways, and feelings of safety when walking and cycling. Another barrier to active travel is the convenience of using a car, especially to carry heavy or bulky loads, and the need to make linked trips such as a school drop-off on the way to work. As part of this Strategy, KCC will work to overcome these barriers to ensure that active travel is easy, safer and more accessible in Kent.

¹ Welsh Government (2014) Active Travel: Walking and Cycling www.gov.uk/government/statistics/active-travel-financial-year-ending-march-2015

² Annexe 1 Policy Context provides further details, visit kent.go.uk/activetravel

³ Annexe 2 Evidence Base provides further details, visit kent.go.uk/activetravel

⁴ Annexe 3 Engagement Workshops provides further details, visit kent.go.uk/activetravel

Our Ambition

Our overarching ambition of this Active Travel Strategy is to:

Make active travel an attractive and realistic choice for short journeys in Kent

Delivering on this ambition will lead to more people walking and cycling, contributing to the following outcomes:

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

These outcomes will be realised by delivering the following actions:

Action 1: Integrate active travel into planning

This Strategy will influence commissioning decisions and ensure walking and cycling are prioritised in future planning processes. In addition, the Strategy will encourage integration of all types of transport as part of the strategic road network. This will be led by current commissioning guidance and best practice, existing KCC policies and strategies, and key partners' policies and strategies with a commitment to encouraging active travel.

Action 2: Provide and maintain appropriate routes for active travel

Kent needs fit-for-purpose active travel routes that people want to use. Kent's existing cycling and walking routes have developed over time as resources have allowed. They are not always continuous or direct, and may not serve important community services, which means that some people who would like to walk or cycle are unable to do so. There is a need to provide facilities such as pedestrian crossings along routes and secure cycle storage at destinations. It is also important that these routes are well maintained.

Action 3: Support active travel in the community

There is a need to encourage and promote active travel in our community. People need the skills, confidence, information and, most importantly, the motivation to make active travel their preferred choice. Initiatives needed to support this change include pedestrian and cycle training, road safety campaigns, projects to encourage walking and cycling to schools and work, and promotion of available routes.

Delivering the actions

Integrate active travel into planning

- Inform the development and application of the County Council's transport policies through the Local Transport Plan
- Support district and borough councils to ensure that active travel is used to deliver sustainable growth and development through local plans and in determining planning applications
- Use the principles and ambitions of KCC's Active Travel Strategy to influence partner policies and strategies
- Work with developers to ensure active travel routes are a priority, both within developments and linking sites to other services, community facilities and transport hubs
- Work with developers to secure sufficient areas within developments for green spaces, attractive routes and environments that encourage active travel
- Work with strategic transport providers to deliver infrastructure that supports active travel.

Provide and maintain appropriate routes for active travel

- Give appropriate consideration to active travel when designing new routes and maintaining highway assets
- Maintain the public highway, Public Rights of Way (PRoW), and active travel resources such as signage to enable safe and effective active travel
- Work in partnership with key organisations both within and neighbouring Kent to identify and prioritise new active travel routes and any maintenance issues on the existing active travel network
- Ensure that active travel improvements to the highway and PRoW network are made in places where there is an evidenced need and where they are supported by local demand and resource
- Make reasonable adjustments to active travel route design to maximise the inclusivity and accessibility to all users
- Support improvements to the local environment in and around schools, hospitals and other public buildings to provide opportunities to cycle or walk all year-round, including appropriate surfacing, cycle storage and lockers
- Evaluate funding for active travel infrastructure and maintenance and proactively seek additional funding
- Support Kent's Casualty Reduction Strategy in delivering key routes to address road safety issues for vulnerable road users.



Support active travel in the community

- In schools, further and higher education:
 - support initiatives including School Travel Plans and other active travel programmes
 - support training for pedestrians and cyclists and support the development of independent travel training programmes.
- In workplaces:
 - support businesses in developing active travel plans and provide information to support active travel in the workplace
 - develop active travel provision within KCC to enable active travel by council staff; KCC should lead by example.
- In health services:
 - work with health professionals to promote active travel and provide support to increase levels of active travel
 - develop methods of including information on active travel in all physical activity advice given by health professionals
 - integrate walking and cycling for travel purposes into public health services and commissioning processes.
- In communities:
 - develop and maintain recreational routes as a means of introducing people to active travel
 - support road safety initiatives for all road users, especially the most vulnerable such as cyclists and pedestrians
 - promote locally-based programmes to encourage walking and cycling, and integrate active travel as part of longer journeys involving public transport.

Funding

Active travel initiatives are funded from a number of different sources and budgets with priorities set within the Local Transport Plan for Kent and other corporate strategies. Government funding allocated to KCC has decreased and is likely to continue to do so as government budgets are also under pressure. However, it is anticipated that opportunities will arise. Previously KCC has been successful with bids for specific Government grants such as to the Local Sustainable Transport Fund, through which grants have been made to schools and businesses. Recent announcements of further funding allocations and opportunities, as outlined in the National Cycling and Walking Investment Strategy, will support the delivery of this Strategy. These funding streams include Bikeability; the Access Fund; the Local Growth Fund and the Integrated Transport Block. This Strategy will also support the proposed development of Ebbsfleet as an NHS Healthy New Town.

This Active Travel Strategy will be key in supporting the sourcing of external funding to promote active travel in Kent as well as seeking active travel network improvements through building development funding.

KCC seeks to support active travel by funding and delivering Independent Travel Training support. This support helps both young people and adults with disabilities to gain confidence in travelling independently, so that they can access college, work and other activities.

This Strategy will also provide KCC with a platform to engage with partners and extend and support public/private partnerships that aim to promote and support active travel initiatives and investment. Working in partnership will be vital to the success of this Strategy.





Active Travel Strategy Consultation Questionnaire

This questionnaire can be completed online at www.kent.gov.uk/activetravel. Alternatively, fill in this paper form and return to: Active Travel Consultation, Safer Mobility Team, 1st Floor Invicta House, Kent County Council, Maidstone ME14 1XX.

Please ensure your response reaches us by the 13th July 2016.

Privacy: Kent County Council collects and processes personal information in order to provide a range of public services. Kent County Council respects the privacy of individuals and endeavours to ensure personal information is collected fairly, lawfully, and in compliance with the Data Protection Act 1998.

Section 1 – About You

1 **Are you responding on behalf of:**

Please select the option from the list below that most closely represents how you will be responding to this consultation.

Yourself as an individual

Yourself in your professional capacity

Please tell us what this is

A local authority or council

A health organisation, such as a CCG, NHS Trust or GP Practice

An educational establishment, such as a school, college or university

A business

A charity, voluntary or community sector organisation (VCS)

Any other group or in any other capacity

Please tell us what this is

1a **If you are responding on behalf of an organisation (a local authority or council, health organisation, educational establishment, business, VCS or any other group) please tell us the name of the organisation.**

Please write in below.

IF YOU ARE RESPONDING ON BEHALF OF AN ORGANISATION (AS LISTED ABOVE) PLEASE GO TO 'SECTION 2 - YOUR RESPONSE TO THE STRATEGY' (QUESTION 7).

2 **Please tell us your postcode.** We use this to help us to analyse our data. It will not be used to identify who you are.

<input type="text"/>						
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- 3 Active Travel means walking or cycling as a means of transport, in order to get to a particular destination such as work, the shops or to visit friends. It does not cover walking and cycling done purely for pleasure, for health reasons, or simply walking the dog. This may be an entire journey or as part of longer journeys which include taking a train or bus.

How regularly do you travel actively?

Please select one option for each type of journey.

	Always	Most of the time	Some of the time	Hardly ever	Never (e.g. always go by car)	Not applicable (e.g. never travel for this purpose)
To get to work?						
To get to school (as a pupil or parent)?						
To go to college?						
To go to university?						
To use services including going to the shops, to the doctors or the bank?						
To get to social or leisure activities?						

4 **Please tell us how frequently you use each of the following methods of transport for journeys of less than 2 miles?**

Please select one option for each mode of transport.

	Always	Most of the time	Some of the time	Hardly ever	Never
Car (as the driver)					
Car (as a passenger)					
Taxi					
Bus					
Train					
Cycle					
Motorcycle/Moped					
Walk					
Park and Ride					
Dial a ride service (such as Kent Karrier)					
Other					

If you have answered 'Other' please specify.

5 **The following is a list of positive outcomes that Active Travel can contribute to. Please rank them in order of importance to you - Select one option in each column.**

	First (Most important)	Second	Third	Fourth	Fifth (Least important)
Improved air quality					
Reduced traffic on the roads					
Financial savings such as fuel, vehicle running costs and parking charges					
Health benefits from physical activity					
Reduced journey times in urban areas					

6 **Do any of the following prevent you from travelling actively (i.e. walking or cycling) to your destination?**

Please select all that apply.

- Perceptions of safety
- A lack of suitable routes
- A lack of facilities such as showers, lockers and secure parking at destinations
- Obstacles in cycle lanes and in footways
- A lack of knowledge of available active travel routes
- Not having the time for active travel
- The comfort of using a car
- The need to carry heavy or bulky loads
- The need to make linked trips, such as a school drop off on the way to work
- Security of belongings e.g. unattended bikes
- Other (please specify)

Section 2 – Your Response to the Strategy

7 **Was the Active Travel Strategy document easy to understand?**

Please select one option

Yes No Don't know

7b **Please add any comments below**

8 **To what extent do you agree or disagree with the Active Travel Strategy's ambition to make 'active travel an attractive and realistic choice for short journeys in Kent'?**

Please select one option.

Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree Don't know

8a **Please add any comments below**

The Active Travel Strategy identifies three action areas to encourage more people to walk or cycle for short journeys in Kent (pages 6-8).

9 **To what extent do you agree or disagree with the measures outlined in Action 1: Integrate active travel into planning?**

Please select one option

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

9a **Please add any comments below**

10 **To what extent do you agree or disagree with the measures outlined in Action 2: Provide and maintain appropriate routes for active travel?**

Please select one option.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

10a **Please add any comments below**

11 **To what extent do you agree or disagree with the measures outlined in Action 3: Support active travel in the community?**

Please select one option.

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Don't know

11a **Please add any comments below**

12 **Anything Else?** Please tell us if there is anything else that you would like to see in this Active Travel Strategy; or if you have any other comments to make, please write them in below. If you require more space please continue onto a separate piece of paper.

- 13 **We have completed an initial Equality Impact Assessment (EqIA) on the draft Active Travel Strategy.** An EqIA is a tool to assess the impact any service change, policy or strategy would have on age, gender, gender identity, disability, race, religion or belief, sexual orientation, pregnancy or maternity, marriage and civil partnership and carer's responsibilities. The EqIA is available online at www.kent.gov.uk/activetravel or on request.

We welcome your views on this. *Please add any comments below.*

Section 3 – Future Engagement and Communication

- 14 **If you would like to receive feedback on this consultation please provide your contact details below.** Our preferred method of communication is by email, however if you do not have an email address then please provide your postal address.

Name	<input type="text"/>
Email Address	<input type="text"/>
Postal Address	<input type="text"/>

Section 4 – More About You

We want to make sure that everyone is treated fairly and equally, and that no one gets left out. That's why we are asking you these questions. We won't share the information you give us with anyone else. We'll use it only to help us make decisions, and improve our services.

YOU ONLY NEED TO ANSWER THESE QUESTIONS IF YOU ARE RESPONDING AS AN INDIVIDUAL. IT IS NOT NECESSARY TO ANSWER THESE QUESTIONS IF YOU ARE RESPONDING ON BEHALF OF AN ORGANISATION.

15 **Are you ...?**

Please select one option.

Male Female I prefer not to say

16 **Which of these best describes what you are doing at present?**

Please select one option.

Working - in full-time job (over 30 hours per week)

Working - in part-time job (30 or fewer hours per week)

Self-employed full or part-time

On a government supported training programme (e.g. Modern Apprenticeship, Training for Work)

Full time education at school, college or university

Unemployed and available for work

Permanently sick/disabled

Wholly retired from work

Looking after the home

Doing something else. *Please tell us what this is*

I prefer not to say

17 **How old are you? Please tell us your age.**

18 **To which of these ethnic groups do you feel you belong?**
 (Source: 2011 Census). *Please select one option.*

White	Mixed	Asian or Asian British	Black or Black British
English <input type="checkbox"/>	White & Black Caribbean <input type="checkbox"/>	Indian <input type="checkbox"/>	Caribbean <input type="checkbox"/>
Scottish <input type="checkbox"/>	White & Black African <input type="checkbox"/>	Pakistani <input type="checkbox"/>	African <input type="checkbox"/>
Welsh <input type="checkbox"/>	White & Asian <input type="checkbox"/>	Bangladeshi <input type="checkbox"/>	Other* <input type="checkbox"/>
Northern Irish <input type="checkbox"/>	Other* <input type="checkbox"/>	Other* <input type="checkbox"/>	I prefer not to say <input type="checkbox"/>
Irish <input type="checkbox"/>	Arab <input type="checkbox"/>	Chinese <input type="checkbox"/>	
Gypsy/Roma <input type="checkbox"/>	*Other Ethnic Group - if your ethnic group is not specified in the list, please describe it here:		
Irish Traveller <input type="checkbox"/>			
Other* <input type="checkbox"/>			

The Equality Act 2010 describes a person as disabled if they have a longstanding physical or mental condition that has lasted, or is likely to last, at least 12 months; and this condition has a substantial adverse effect on their ability to carry out normal day-to-day activities. People with some conditions (cancer, multiple sclerosis and HIV/AIDS, for example), are considered to be disabled from the point that they are diagnosed.

19 **Do you consider yourself to be disabled as set out in the Equality Act 2010?**
Please select one option

Yes No I prefer not to say

19a **If you answered Yes to Q19, please tell us which type of impairment applies to you.**
You may have more than one type of impairment, so please select all the impairments that apply to you. If none of these applies to you, please select 'Other', and give brief details of the impairment you have.

- Physical impairment
- Sensory impairment (hearing, sight or both)
- Long standing illness or health condition, such as cancer, HIV/AIDS, heart disease, diabetes or epilepsy
- Mental health condition
- I prefer not to say
- Other (Please specify)

20 **Do you regard yourself as belonging to a particular religion or belief?**
Please select one option.

- Yes No I prefer not to say

20a **If you have answered Yes to Q20, which of the following applies to you?**
Please select one option.

Christian Buddhist Hindu Jewish Muslim

Sikh Other *Please specify*

I prefer not to say

Thank you for taking the time to complete this consultation. Please post your completed questionnaire to:

Active Travel Consultation
Safer Mobility Team
1st Floor Invicta House
Kent County Council
Maidstone
ME14 1XX

Alternative formats

This document can be made available in other formats or languages, please email alternativeformats@kent.gov.uk or telephone **03000 421553** (text relay service **18001 03000 421553**). This number goes to an answer machine, which is monitored during office hours.

Annexe 1 - Policy Context

Kent County Council - Draft Active Travel Strategy

May 2016

Policy/Strategy/Guidance	Owner	Summary	Link	Dates
KCC <input type="checkbox"/> <input type="checkbox"/>				
Increasing Opportunities, Improving Outcomes.	KCC	KCC's strategic statement 2015-2020	http://www.kent.gov.uk/about-the-council/strategies-and-policies/corporate-policies/increasing-opportunities-improving-outcomes	2015-2020
Growth, Environment and Transport (GET) Business Plan	KCC - Growth, Environment and Transport	The key priorities for GET for the year ahead	http://www.kent.gov.uk/about-the-council/strategies-and-policies/corporate-policies/business-plans	2015-2016
Social Care, Health and Wellbeing (SCHW) Business Plan	KCC – Social Care, Health and Wellbeing	The key priorities ahead for SCHW for the year ahead	http://www.kent.gov.uk/about-the-council/strategies-and-policies/corporate-policies/business-plans	2015-2016
Mind the Gap	KCC Public Health	Kent's Health Inequalities Action Plan	http://www.kent.gov.uk/social-care-and-health/health/health-and-public-health-policies	2012-2015
Joint Health and Wellbeing Strategy	Kent Health and Wellbeing Board	Kent's strategy for improving health care services in Kent.	http://www.kent.gov.uk/social-care-and-health/health/health-and-public-health-policies/joint-health-and-wellbeing-strategy	2014-2017
Kent Environment Strategy and Implementation Plan	KCC – Growth Environment and Transport	A strategy for environment, health and economy.	http://www.kent.gov.uk/about-the-council/strategies-and-policies/environmental-policies/kent-environment-strategy	2016
Home to School Transport Policy	KCC - Education	Kent's obligations to deliver Home to School Transport to children living in Kent	http://www.kent.gov.uk/data/assets/pdf_file/0019/19009/Home-to-school-transport-guidance-booklet.pdf	2016/2016
16 – 19 Transport Policy	KCC – Highways, Transportation and Waste	A policy that allows schools, colleges and training providers to secure a 16+ travel card for their students to use on all registered public service bus routes in Kent.	http://www.kent.gov.uk/about-the-council/strategies-and-policies/transport-and-highways-policies/post-16-transport-policies	2015-2016
Development and Infrastructure - Creating	KCC – Growth, Environment and	A framework by which KCC, along with partners, will deliver necessary	http://www.kent.gov.uk/about-the-council/strategies-and-policies/regeneration-	

Quality Places Kent Design Guide	Transport KCC – Growth, Environment and Transport	community infrastructure. The guide aims to encourage well considered schemes that create developments where people really want to live, work and enjoy life.	http://www.kent.gov.uk/about-the-council/strategies-and-policies/regeneration-policies/kent-design-guide	2000
Unlocking Kent's Cultural Potential	KCC – Growth, Environment and Transport	A cultural strategy for Kent that promotes how the county's cultural offer can enhance the lives of people who live in Kent.	http://www.kent.gov.uk/about-the-council/strategies-and-policies/culture-and-sport-policies/cultural-strategy	2010-2015
Local Transport Plan 4 (in development)	KCC – Highways, Transportation and Waste	Describes how KCC will work towards our transport vision over a 5 year period using government funding.	http://www.kent.gov.uk/about-the-council/strategies-and-policies/transport-and-highways-policies/local-transport-plan	2016-2021
Road Casualty Reduction Strategy	KCC - Highways, Transportation and Waste	A strategy for reducing road casualties in Kent.	www.kent.gov.uk/roads-and-travel/road-safety/road-casualty-reduction-strategy	2014-2020
Strategic Framework for Sport and Physical Activity in Kent	KCC – Growth, Environment and Transport	A strategy to provide a direction of travel for sport and physical activity in Kent	http://www.kent.gov.uk/about-the-council/strategies-and-policies/culture-and-sport-policies/framework-for-sport-and-physical-activity	2012-2022
KCC's Countryside & Coastal Access Improvement Plan	KCC – Growth, Environment and Transport	This plan aims to increase the use and enjoyment of Kent's public rights of way and open green space.	http://www.kent.gov.uk/about-the-council/strategies-and-policies/country-side-policies-and-reports/countryside-and-coastal-access-improvement-plan	2013-2017
Kent Better Homes - Better homes: localism, aspiration and choice	KCC	This document describes the strategic direction for housing across Kent	http://www.kent.gov.uk/about-the-council/strategies-and-policies/housing-policies/better-homes	2011
New Ways of Working	KCC (Infrastructure leading investment/refurbishment aspect)	Investment programme to deliver transformed office spaces and facilities to support flexible working (also looking at parking and how to reduce demand and costs)		
Partners				
Local Plans and Transport Strategies	Local district/borough councils	Each district/borough will develop a local transport plan for their area.	These plans will be available on district/borough websites.	
District Cycle Strategies	District/ borough councils	In partnership with the district councils, KCC has a number of local cycling strategies, which focus on specific local issues.	http://www.kent.gov.uk/about-the-council/strategies-and-policies/transport-and-highways-policies/cycling-strategies	

School Travel Plans	Individual schools	These plans help encourage smarter and sustainable ways to travel when on the journey to and from school	More information can be found here: http://lambusterslpmns.co.uk/x.jsp?ano=1	
Business Travel Plans	Individual businesses	The plans encourage more sustainable methods of commuting to work and to meetings.	More information can be found here: http://www.kent.gov.uk/business/Business-and-the-environment/sustainable-business-transport	
Kent Downs AONB Management Plan	Kent Downs AONB	The aim is to ensure that the natural beauty and special character of the landscape and vitality of the communities are recognised, maintained and strengthened well into the future.	http://www.kentdowns.org.uk/guidance-management-and-advice/management-plan	2014-2019
South East Local Enterprise Partnership Growth Deal	SELEP	Growth Deals are a £12 billion long-term programme to revitalise local economies.	http://www.southeastlep.com/growth-deal	2015-221
National Policy				
Securing the Value of Nature; the Kent Nature Partnership Action Plan	KNP	This report explains the benefits of the value of nature to support the economy, public health and land management.	http://www.kentnature.org.uk/assets/files/Resources/Securing-the-Value-of-Nature-in-Kent.pdf	2011
Public Health Outcomes Framework	Department of Health	This document sets out desired outcomes for public health and how they will be measured	https://www.gov.uk/government/publication/s/healthy-lives-healthy-people-improving-outcomes-and-supporting-transparency	2013-2016
Everybody Active, Every Day	Public Health England	An evidence-based approach for national and local action to address the physical inactivity epidemic	https://www.gov.uk/government/publication/s/everybody-active-every-day-a-framework-to-embed-physical-activity-into-daily-life	2014
Start Active, Stay Active	Department of Health	UK-wide report with guidelines on the volume, duration, frequency and type of physical activity required to achieve general health benefits	https://www.gov.uk/government/publication/s/start-active-stay-active-a-report-on-physical-activity-from-the-four-home-countries-chief-medical-officers	2011
NICE Guidance PH41: Walking & Cycling	National Institute of Health & Care Excellence	Public health guidance on increasing walking and cycling as forms of physical activity	https://www.nice.org.uk/guidance/ph41	2012
NICE Guidance PH8: Physical Activity & the Environment	National Institute of Health & Care Excellence	Public health guidance on changes to the built and natural environment to facilitate physical activity	https://www.nice.org.uk/guidance/ph8	2008
NICE Guidance PH13: Physical Activity in the	National Institute of Health & Care	Public health guidance on encouraging employees to walk and cycle	https://www.nice.org.uk/guidance/ph13	2008

Workplace National Infrastructure Plan	Excellence HM Treasury, Infrastructure UK and Infrastructure and Projects Authority	This document shows the government's progress on delivery and sets out its long-term plans for UK infrastructure.	https://www.gov.uk/government/publications/national-infrastructure-plan-2014	2014
Creating Growth, Cutting Carbon	Department for Transport	The government's vision for a sustainable local transport system that supports the economy and reduces carbon emissions.	https://www.gov.uk/government/publications/creating-growth-cutting-carbon-making-sustainable-local-transport-happen	2011
Door to Door Strategy	Department for Transport	Sustainable door-to-door journeys strategy	https://www.gov.uk/government/publications/door-to-door-strategy	2013
Cycling and Walking Investment Strategy	Department for Transport	The CWIS will set out a long-term vision for walking and cycling to 2040	https://www.gov.uk/government/consultations/draft-cycling-and-walking-investment-strategy	2016-2040

Annexe 2 – Benefits of Active Travel

Kent County Council - Draft Active Travel Strategy

May 2016

Physical Activity

Evidence for the beneficial effect of increasing levels of physical activity in all parts of the population is robust and well documented¹². Low levels of physical activity are responsible for 17% of all premature deaths in the UK population, causing diabetes, heart disease and other preventable conditions³.

Initiatives to improve levels of physical activity in Kent are needed. 44%⁴ of the Kent adult population do not currently meet recommended weekly levels of physical activity⁵. 28%⁶ of these people are 'physically inactive', meaning they do little or no physical activity of any kind. The Kent population falls below the UK average for levels of physical activity⁷. 65% of adults in Kent are above a healthy weight, and 33% of children are above a healthy weight by the time they leave primary school⁸.

Active travel gives people an opportunity to be physically active as part of their daily routine, which can contribute to improved health and help to prevent or manage a range of chronic diseases^{9,10,11}. The contribution that active travel can make to physical activity and health has also been recognised by Government^{12,13}. Using active travel also incorporates physical activity into everyday tasks, which can reduce the need to find extra time or money to exercise specifically for the health benefits.

It is also recognised that recreational routes can assist with modal shift towards active travel for functional journeys. Active travel, in particular walking, has few barriers to participation.

¹ World Health Organisation (2010). Global Recommendations on Physical Activity for Health. http://www.who.int/dietphysicalactivity/factsheet_recommendations/en/

² Department of Health (2011). Start Active, Stay Active: a report on physical activity from the four home countries' Chief Medical Officers. <https://www.gov.uk/government/publications/start-active-stay-active-a-report-on-physical-activity-from-the-four-home-countries-chief-medical-officers>

³ Lee, I, et al. (2012). Effect of physical inactivity on major non-communicable diseases worldwide: an analysis of burden of disease and life expectancy. *The Lancet*. 380 (9838), 219-229. [http://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(12\)61031-9/abstract](http://www.thelancet.com/journals/lancet/article/PIIS0140-6736(12)61031-9/abstract)

⁴ Public Health England (2016). Public Health Outcomes Framework. <http://www.phoutcomes.info/public-health-outcomes-framework#gid/1000042/pat/6/ati/102/page/0/par/E12000008/are/E10000016>

⁵ Department of Health (2011). Start Active, Stay Active: a report on physical activity from the four home countries' Chief Medical Officers. <https://www.gov.uk/government/publications/start-active-stay-active-a-report-on-physical-activity-from-the-four-home-countries-chief-medical-officers>

⁶ Public Health England (2016). Public Health Outcomes Framework. <http://www.phoutcomes.info/public-health-outcomes-framework#gid/1000042/pat/6/ati/102/page/0/par/E12000008/are/E10000016>

⁷ IBID

⁸ IBID

⁹ Public Health England (2014). Everybody Active Every Day. <https://www.gov.uk/government/publications/everybody-active-every-day-a-framework-to-embed-physical-activity-into-daily-life>

¹⁰ Department of Health (2011). Start Active, Stay Active: a report on physical activity from the four home countries' Chief Medical Officers. <https://www.gov.uk/government/publications/start-active-stay-active-a-report-on-physical-activity-from-the-four-home-countries-chief-medical-officers>

¹¹ UK Active (2014). Steps to Solving Inactivity http://www.ukactive.com/downloads/managed/Steps_to_Solving_Inactivity_-_Up_to_date.pdf

¹² Department for Transport (2009) The Physical Fitness Sub-objective, TAG Unit 3.3.12, Transport Appraisal Guidance <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.12.php>

¹³ Department for Transport (2011) Creating Growth, Cutting Carbon: Making Sustainable Local Transport Happen <http://www.dft.gov.uk/pgr/regional/sustainabletransport/>

Encouragement of walking has been found to be one of the most effective methods for the promotion of physical activity in a sedentary population¹⁴.

Congestion & Air Quality

Making shorter journeys using active means of travel can contribute to reducing congestion by reducing the number of cars on the road¹⁵. In urban areas, journey times are often shorter when walking or cycling as users are able to take advantage of paths not accessible to motor vehicles.

5.3% of early deaths in the UK can be attributed to long-term exposure to small particles polluting the air¹⁶, making air pollution the greatest environmental risk linked to deaths every year.

Reducing the number of cars on the road can also contribute to improved air quality and reduced carbon emissions¹⁷. In 2012, 21% of UK domestic greenhouse gas emissions were from transport¹⁸. Road transport is the largest contributor to total transport greenhouse gas emissions, comprising 68% of the total amount produced, including 40% from cars and taxis¹⁹. Making more journeys using active travel, including part-journeys that use public transport, can make a significant contribution to reducing the levels of emissions from private motor vehicles.

The number of cars on the road has increased year-on-year since 1950²⁰, and this trend is projected to continue. Making more journeys using active travel will become of greater importance and convenience in the future.

The number of people walking and cycling has declined in the last 20 years. Fewer than 1 in 10 people walk to work in the South East, with an average journey time of 14 minutes. At average walking speeds, this would mean covering distances of half a mile to one mile. 3 out of every 100 people cycle to work in the South East despite 45% of people over the age of 5 years old owning a bike. Men are more than twice as likely to cycle to work as women, and the average length of journeys by cycle has increased since 1996²¹.

Walking is significantly more popular than cycling as a transport option. 22% of all journeys in the UK in 2013 were made by walking; just 2% were made by cycling. Walking to school or college is currently the main reason people walk for transport; 22% of journeys made by walking were for the school run whilst just 8% were for commuting to work or business trips²².

Barriers to Active Travel

Whilst walking and cycling offer increased health through physical activity, they also present risks through, for example, atmospheric pollution, road crashes and social inequality.

¹⁴ Hillsdon, M. (1996) A systematic review of physical activity promotion strategies, British Journal of Sports Medicine, volume 30, number 2, pp. 84-89.

¹⁵ NICE (2012) Walking and cycling: local measures to promote walking and cycling as forms of travel or recreation. PH41. <http://guidance.nice.org.uk/PH41>

¹⁶ Public Health England (2016). Public Health Outcomes Framework. <http://www.phoutcomes.info/public-health-outcomes-framework#gid/1000042/pat/6/ati/102/page/0/par/E12000008/are/E1000016>

¹⁷ NICE (2012) Walking and cycling: local measures to promote walking and cycling as forms of travel or recreation. PH41. <http://guidance.nice.org.uk/PH41>

¹⁸ Department for Transport (2014) Road Transport Statistics 2014 <https://www.gov.uk/government/statistics/transport-statistics-great-britain-2014>

¹⁹ IBID

²⁰ IBID

²¹ Department for Transport (2014) Road Transport Statistics 2014 <https://www.gov.uk/government/statistics/transport-statistics-great-britain-2014>

²² Department for Transport (2014) Road Transport Statistics 2014 <https://www.gov.uk/government/statistics/transport-statistics-great-britain-2014>

A series of workshops to engage stakeholder organisations in Kent showed that common reasons for not making short journeys using active travel include:

- a lack of joined-up routes that allow people to make functional journeys through active travel;
- a lack of knowledge of opportunities for active travel, including knowing where cycle lanes and paths are;
- car parking, street furniture and building in cycle lanes or pedestrian routes;
- issues with safety and perceptions of safety on roads, particularly for vulnerable user groups;
- the relative greater comfort of using a car.

Other issues cited as common barriers to active travel include a lack of motivation in individuals and populations, a lack of time due to modern lifestyles, necessity for families to make multi-drop journeys, disability or injury, carrying heavy loads or transporting young children and pets, poor weather especially in winter, and the social trend that with increasing affluence people are able to buy mobility and convenience²³.

Another key issue is safety. Pedestrians and cyclists suffer the second and third highest casualty rates of all transport types, with 29 and 27 fatalities respectively per billion kilometres travelled²⁴. The perceived safety of cars is supported by evidence, with only two fatalities for the same distance travelled. Perceptions of safety for pedestrians and cyclists go beyond road traffic accidents and include travelling alone along unlit or poorly-lit alleyways and through areas with high rates of crime, particularly for vulnerable groups including children or lone females.

Active Travel in Kent

The following statistics have been identified for Kent:

- 10.1% of Kent workers walk to work, this is higher than the national and regional figure of 9.8%²⁵
- Only 1.1% of people in Kent cycle to work in comparison to 1.9% in England²⁶.
- In Kent, 14.5% of people in Kent say they cycle more than once per month, which is slightly below the national average²⁷
- Pedal cycle KSI casualties have increased in Kent in 2014 to 126% above the 2004-2008 average and collisions involving pedal cycles are now 51% above the 2004 to 2008 baseline²⁸.

The Department for Transport carry out annual count surveys across the county²⁹, the below figure illustrates trends in cycling and all traffic since 2000 to 2014. Traffic figures at regional and national level are robust and are reported as National Statistics. However, this is not the case for road traffic at a local level. These figures are taken from counters on strategic routes across the county and may not reflect the true numbers of cyclists on the roads.

²³ Mackett, R & Brown, B (2011) Transport, Physical Activity and Health: Present knowledge and the way ahead <https://www.ucl.ac.uk/news/pdf/transportactivityhealth.pdf>

²⁴ Department for Transport (2014) Road Transport Statistics 2014 <https://www.gov.uk/government/statistics/transport-statistics-great-britain-2014>

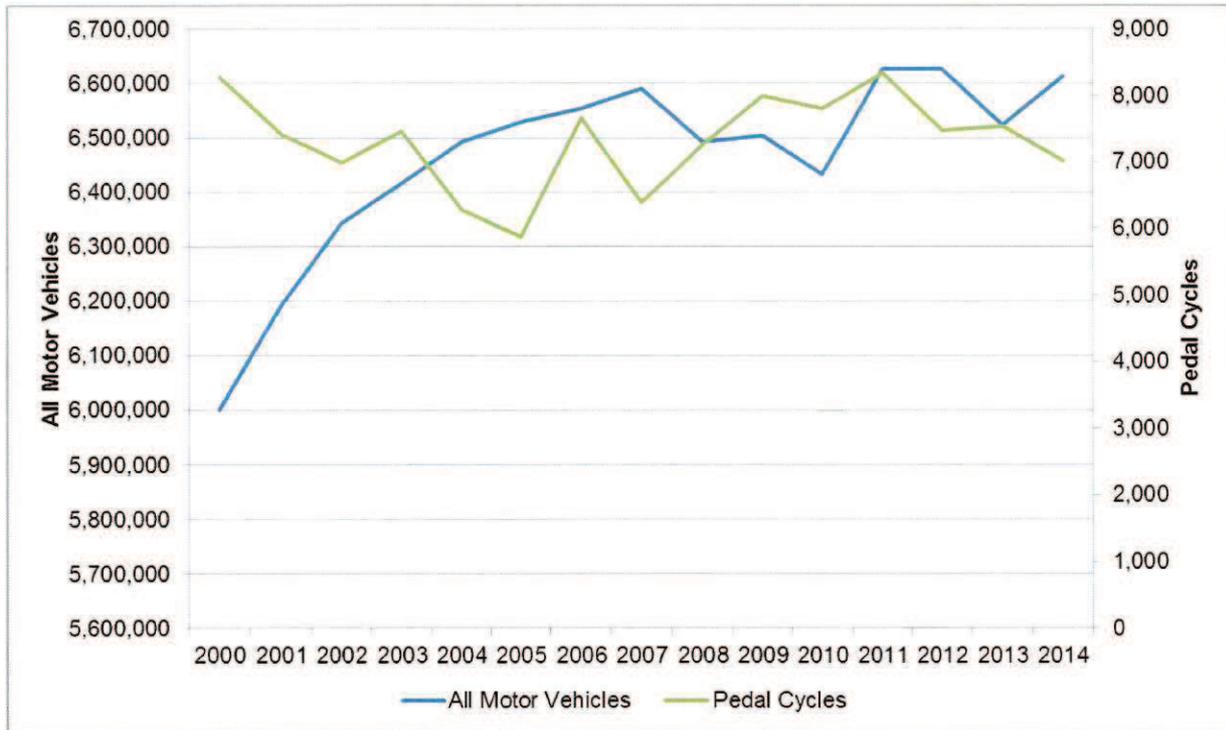
²⁵ shareweb.kent.gov.uk/Documents/facts-and-figures/Population-and-Census/2011%20Census/2011-method-of-travel-to-work.pdf

²⁶ <http://webarchive.nationalarchives.gov.uk/20160105160709/http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-353510>

²⁷ Department for Transport (2014) Road Transport Statistics 2014 www.gov.uk/government/statistics/transport-statistics-great-britain-2014

²⁸ Kent County Council 2015

²⁹ www.dft.gov.uk/traffic-counts/area.php?region=South+East&la=Kent



Annexe 3 – Engagement Workshops

Kent County Council - Draft Active Travel Strategy

May 2016

Summary

A series of events were held to engage with stakeholders and target populations to inform the development of the Active Travel Strategy for Kent. The two main points raised across all discussions were:

1. Kent needs joined-up pedestrian and cycle routes that people actually want to use
2. Effective and widespread promotion of active travel opportunities is necessary

To support the development of the Active Travel Strategy for Kent, a series of engagement events were held to discuss the development of the strategy with partners and stakeholders. A Task & Finish group was tasked by the main Project Group with delivering this engagement process. This annexe outlines the engagement process and outcomes.

Stakeholder Workshops

Two pre-consultation engagement workshops were held, split geographically to suit stakeholders from the west and east of the county. Both workshops followed the same format and were intended to:

- Explore interest in active travel from a range of different stakeholder groups;
- Provide an opportunity to think about issues relating to the infrastructure required to promote active travel interventions;
- Seek ideas about how KCC can support behaviour change that encourages more cycling and walking across the county;
- Allow participants to shape thinking at an early stage and influence detailed work going forward.

Over 70 representatives of external stakeholder organisations were involved in the workshops, including representation from:

- Schools/Children and Young People
- Workplaces, businesses and higher education
- Housing associations, community organisations, charities and local authorities
- Transport planning, infrastructure and highways
- NHS, health and social care

Workshop Outcomes

The two main points that came out of all discussions at workshops and in follow-up discussions with stakeholder organisations and Kent residents were that:

1. Kent needs joined-up pedestrian and cycle routes that people actually want to use
2. Effective and widespread promotion of active travel opportunities is needed.

A summary of the discussions from all stakeholders across both workshops is below.

General

- Active travel and road safety legislation would have the biggest impact
- Any strategy requires political support at all levels

Infrastructure

- Kent needs joined-up active travel routes that people actually want to use
- Active travel must be a priority in transport and development planning
- Separated lanes are ideal but unrealistic, there will always be some shared use
- Lack of knowledge of opportunities; need hard signage for routes
- 20mph zones in key areas can promote safety and the perception of safety

Behaviour

- Promote the available infrastructure
- Deliver a positive-messages communications plan to promote active travel routes and opportunities
- Encourage promotion by all partners including through partnerships with housing associations, schools, NHS, workplaces, estate agents, leisure centres, and with transport organisations.
- Understand motivations in specific populations or locations and message appropriately
- Discouraging parking, car use, blocking cycle lanes, building in cycle lanes or pedestrian routes
- Safety on roads and perceptions of safety, particularly in vulnerable road users

Further Engagement

In addition to the stakeholder workshops, sessions were held with local further education college students and Youth County Council members to identify issues specific to young people around driving age. The session highlighted that young people face similar barriers to active travel as the rest of the population, but that promotion and marketing should be specific to that age group.

**KENT COUNTY COUNCIL
EQUALITY ANALYSIS / IMPACT ASSESSMENT (EqIA)**

This document is available in other formats, please contact
Stephanie.holt@Kent.gov.uk or telephone on 03000 412064

Directorate: Highways, Transportation and Waste

Name of project: Active Travel Strategy

What is being assessed? Draft Active Travel Strategy

Responsible Owner/ Senior Officer: Stephanie Holt

Date of Initial Screening 02/07/15, initial screening repeated 12/02/16 on worked up draft

Date of Full EqIA: 15/03/2016

Version	Author	Date	Comment
2	S Holt	12/2/16	Reworked initial screening based on detail of draft strategy
3	J Hill	9/03/2016	E & D Comments
4	K Ireland A Fairhurst	15/03/2016	Revision following E&D Comments
5	Akua Agyepong	1 April 2016	E&D Comments
6	K Ireland	5 April 2016	Final for consultation

Screening Grid

Characteristic	Could this policy, procedure, project or service, or any proposed changes to it, affect this group less favorably than others in Kent? YES/NO If yes how?	Assessment of potential impact LOW/NONE UNKNOWN	Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why? Internal action must be included in Action Plan	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities If yes you must provide detail				
Age	Yes – older residents who are less mobile may benefit less from this strategy than others	<table border="1"> <tr> <td>Positive</td> <td>Medium</td> </tr> <tr> <td>Negative</td> <td>Low</td> </tr> </table>	Positive	Medium	Negative	Low	Active Travel relies on an individual having the ability to be mobile in their own right	<p>Yes – improved continuous, joined up or direct walking or cycling-designated routes could support older residents reliant on mobility scooters access local services, amenities or friends/family</p> <p>Yes – Adult Cycling Courses will benefit adults aged 18+</p> <p>Yes – creating a safer (and enabling a perception of more attractive/safer) environment in which to walk/cycle will benefit both school aged children and older residents in particular</p> <p>Yes – ensure images, training or signposting introduced to support this strategy have relevance and appeal to the local community, including different age groups</p>
Positive	Medium							
Negative	Low							

Disability	Yes – not all active travel infrastructure investment will benefit certain disabled communities to the same extent as certain non disabled communities	Medium	Low	Active Travel relies on an individual having the ability to be mobile in their own right	Yes – improved continuous, joined up or direct walking or cycling-designated routes will enable certain disabled communities to more easily access local services, amenities or friends/family Yes – ensure any images, training or signposting introduced to support this strategy have relevance and appeal and are simple and clear to understand to the local community, including disabled groups
Gender	Yes – evidence suggests that fewer women cycle than men	Medium	Low		Yes – ensure any images, training or signposting introduced to support this strategy have relevance and appeal to women as a targeted group, as well as adults generally
Gender identity	No	None	None	No	No
Race	No	Low	Low		Yes – ensure any images, training or signposting introduced to support this strategy have relevance and appeal to the local community, including where local population data indicates a high proportion of one or more BAME groups
Religion or belief	No	None	None	No	No
Sexual orientation	No	None	None	No	No

Pregnancy and maternity	No	None	None	No	No
Marriage and Civil Partnership	No	None	None	No	No
Carer's responsibilities	No	None	None	No	No

Part 1: INITIAL SCREENING

Proportionality - Based on the answers in the above screening grid what RISK weighting would you ascribe to this function – see Risk Matrix

Low	Medium	High
Low relevance or Insufficient information/evidence to make a judgement.	Medium relevance or Insufficient information/evidence to make a Judgement.	High relevance to equality, /likely to have adverse impact on protected groups

Low Risk

The overall ambition of the Active Travel Strategy is to improve access to walking and cycling routes in Kent, ensuring they are maintained, appropriate and promoted. Whilst some risks have been noted in the initial screening, the overall impact of the Strategy has positive outcomes for the identified groups. Any risks identified above are targeting in the below Action Plan, showing how we intend to reduce any negative impacts.

Context

What is Active Travel?

Active travel means walking or cycling as a way of getting to a particular destination such as work, the shops or social visits. For the purpose of this draft Active Travel Strategy, it does not include walking and cycling done purely for pleasure or for health.

Why is Kent writing an Active Travel Strategy?

KCC wants to make active travel a real and viable option for people who are making short journeys in Kent – more information can be found in the Aims and Objectives section below.

In the current economic climate of reducing budgets, a strategy will provide a basis on which KCC will be able to prioritise internal resources, influence how new communities are developed and to support bids for external funding for a range of active travel measures.

What is the policy context behind the Strategy?

Improving transport is identified in the KCC Strategic Statement 2015-2020 under outcome 2: Kent Communities feel the benefits of economic growth by being in-work, healthy and enjoying a good quality of life.

The Strategy will contribute to outcomes in the Kent County Council Strategic Outcomes Framework by improving the health, environment and sustainability opportunities for Kent. This Strategy will also support delivery of the below:

Public Health Outcomes Framework

- Indicator 2.13i - Percentage of physically active and inactive adults - active adults
- Indicator 2.13ii - Percentage of physically active and inactive adults - inactive adults

NICE Commissioning Guidance

- PH8 – Physical Activity and the Environment
- PH41 – Physical Activity – Walking and Cycling

Growth without Gridlock - Launched in December 2010, Growth without gridlock is KCC's transport delivery plan. The plan sets out our priorities for the county and our offer to government to deliver them. It also identifies new ways to raise revenue in response to reduced government funding. Through delivering the plan we aim to create new jobs, new opportunities for businesses and boost economic growth in Kent.

Road Casualty Reduction Strategy for Kent (2014-2020) – Launched in 2014 this Strategy outlines Kent's priorities with regards to Road Safety.

What are the benefits of active travel?

- Improve health and can contribute to lower chances of some health conditions
- It can be cheaper to travel actively by saving money on fuel/vehicle running costs/parking charges
- Reduces the number of vehicles on the road
- Can contribute to improved air quality
- Can be quicker – journey times can be reduced as active travel can take advantage of routes not accessible to motor vehicles.

What are the barriers to active travel?

- A lack of suitable routes for journeys between homes and community services, workplaces or schools; a lack of facilities such as showers, lockers and secure parking; and obstacles in cycle lanes and in footways.
- A lack of knowledge of available active travel routes.
- Individual issues such as not having the time or motivation to choose active travel, the ease of using a car, the need to carry heavy or bulky loads and the need to make 'linked' trips, such as a school drop off on the way to work.
- Safety: including pedestrians and cyclists being involved in collisions, and perceptions of safety and security.
- Reduced local authority budgets making it challenging to implement active travel measures

Aims and Objectives

Our overarching ambition of this Active Travel Strategy is to make active travel an attractive and realistic choice for short journeys in Kent.

This ambition is supported by the following outcomes:

- More people making active travel journeys
- Improved population health through an increase in physical activity
- Reduced congestion on the highway network by providing better travel choices
- Improved safety of the active travel network.

These outcomes will be realised by delivering the following actions:

Action 1: Integrate active travel into planning

This Strategy will influence commissioning decisions and ensure walking and cycling are prioritised in future planning processes. In addition, the Strategy will encourage integration of all types of transport as part of the strategic road network. This will be led by current commissioning guidance and best practice, existing KCC policies and strategies, and key partners' policies and strategies with a commitment to encouraging active travel.

Action 2: Provide and maintain appropriate routes for active travel

Kent needs fit-for-purpose active travel routes that people want to use. Kent's existing cycling and walking routes have developed over time as resources have allowed. They are not always continuous or direct, and may not serve important community services, which means that some people who would like to walk or cycle are unable to do so. There is a need to provide facilities such as pedestrian crossings along routes and secure cycle storage at destinations. It is also important that these routes are well maintained.

Action 3: Support active travel in the community

There is a need to encourage and promote active travel in our community. People need the skills, confidence, information and, most importantly, the motivation to make active travel their preferred choice. Initiatives needed to support this change include pedestrian and cycle training, road safety campaigns, projects to encourage walking and cycling to schools and businesses, and promotion of available routes.

Beneficiaries

Increasing the number of journeys made by active modes of travel will have benefits for the residents and visitors to Kent – see the above benefits to Active Travel.

Information and Data

By 2050, the NHS cost attributable to obesity and overweight will be £9.7 billion and the total costs will be £49.9 billion. The direct costs of illness as an outcome of physical inactivity to the NHS are quoted to be as much as £1.0 billion per annum, while costs to the whole economy are estimated at £20 billion per annum.

Over 26% of adults in Kent are classed as physically inactive and at a high risk

of developing disease conditions as a result of their sedentary lifestyle. Over 43% fail to meet recommended levels of activity required to maintain good health. 21% of children in Kent are above a healthy weight when starting primary school, increasing to 33% by the time they leave.

Robust evidence has highlighted how active travel, specifically journeys made by cycle and on foot, can contribute to a wide range of outcomes. Active travel gives people an opportunity to be physically active as part of their daily routine, which will contribute to improved health as well as preventing or managing a range of chronic diseases. It can also contribute to improve air quality, reduced congestion and reduced carbon emissions through reducing the number of cars on the road. Kent currently has no strategic policy to meet these objectives through increasing active travel.

Involvement and Engagement

The consultation and engagement process commenced with two half day workshops held on the 1st and 7th October 2015 which involved over 70 key stakeholders and representative groups. Additional engagement was also held with the West Kent Health and Wellbeing Board, a workshop with 20 Mid Kent College Students on 7th January 2016, and a facilitated discussion at Kent Youth County Council on 20th March 2016.

Invitations to the pre engagement workshops were sent to groups including Guide Dogs, District Access Groups, CILK, and KAB. The feedback specifically regarding access issues were that:

- Infrastructure needs to be appropriate for all user types, e.g. tactile paving for visual impairment
- Any signage should take into account all user types including visually impaired

This was included in the summary of the workshops and considered when drafting the Strategy.

A eight week public consultation is planned commencing in May 2016.

What is the consultation asking?

The consultation is asking Kent residents to read the proposed Strategy and to provide feedback on the content, including views on our proposed aims and objectives (above) and whether we have missed anything which is important to the respondent. The consultation will also ask about the respondent's current level of active travel activity as well as the standard EqIA About You questions so that we can ensure that we have responses from a diverse range of the County. A mid consultation review will take place to identify if there are any groups which we have not had responses from, and efforts will be made to consult with them.

When will it be reported on?

The consultation will begin following Environment and Transport Cabinet Committee approval on the 4th May. It will run from 18th May to the 13th July 2016.

There will be a mid-consultation review meeting of the Active Travel Strategy Project Group which will analyse the responses so far and identify if there are any gaps in the profiles of the responses received compared to those that we wish to target (i.e. those identified in the screening grid above). Where any gaps are identified, efforts will be made to engage with these groups.

Following the close of the consultation, responses will be reviewed and reported on at an Active Travel Strategy Project Group meeting. The responses will be used to amend the Strategy where appropriate, and a final version of the Strategy will then be submitted to Environment and Transport Cabinet Committee for adoption. .

Potential Impact:

Some of those within specific protected characteristics groups (older persons, and disabled) may potentially find it difficult or impossible to partake in active travel at all, and will therefore benefit less from this strategy than others. However the draft strategy also seeks outcomes that will benefit and potentially grow the numbers of elderly and people with a disability that can become more confident, informed and able to actively travel. This will therefore improve their access to key services and employment, as well as their local community.

Adverse Impact:

There do not appear to be any adverse implications of implementing an Active Travel Strategy. This was supported by the preliminary consultation feedback.

Positive Impact:

The strategy and outcomes have the potential to have a significant positive impact provided Interventions and measures are inclusive and are tailored to where they can have most benefit. The positive impacts with regards to equality and diversity are:

- Increased take up in identified groups
- Routes which are accessible/have improved access
- Opportunity for all to be more physically active
- Improvements in air quality that benefit the whole population

JUDGEMENT

Option 1 – Screening Sufficient	NO
Option 2 – Internal Action Required	YES
Option 3 – Full Impact Assessment	Yes

A full impact assessment is required as the draft Active Travel Strategy is going out to consultation.

Action Plan

The draft Strategy has had two engagement workshops and will have an eight week consultation. This EqIA will be reviewed for the fourth time and updated in response to the consultation feedback.

Monitoring and Review

It is intended that the Strategy will include an Action Plan which will be a live piece of work and updated annually. That Action Plan will similarly be Equality Impact Assessed, and implementation adjusted accordingly.

Sign Off

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

Senior Officer

Signed: 

Name: Stephanie Holt

Job Title: Head of Countryside, Leisure and Sport Date: 12/02/16

DMT Member

Signed: 

Name: Tim Read

Job Title: Head of Transportation Date: 11/04/2016

Please forward a final signed electronic copy to the Equality Team by emailing diversityinfo@kent.gov.uk

Equality Impact Assessment Action Plan

Protected characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
Age		Ensure consultation engages with this group to hear feedback	Potential to identify where we can help deliver active travel that supports older residents	Active Travel Group	In line with writing of implementation plan	To be determined
	Older residents who are less mobile may benefit less from this strategy than others	Improved continuous, joined up or direct walking or cycling- designated routes could support older residents reliant on mobility scooters access local services, amenities or friends/family	Increased usage of active travel	Active Travel Group	In line with writing of implementation plan	To be determined
		Adult Cycling Courses will benefit adults aged 18+	Growth in number of Kent adult residents regularly cycling in Kent	Safer Mobility Team Leader	Ongoing	To be determined
	Safety perceptions across the age groups	Creating a safer (and enabling a perception of more attractive/safer) environment in which to walk/cycle will benefit both school aged children and older residents in particular	Increased usage of active travel	Active Travel Group	To be determined	To be determined
	Promotional material may not reflect all age groups	Ensuring images, training or signposting introduced to support this strategy have relevance and appeal to the local community, including different age groups	Increase in diversity of promotional material	Active Travel Group	To be determined	To be determined

Race	Promotional material may not reflect diversity	Ensuring any images, training or signposting introduced to support this strategy have relevance and appeal across a diverse population	Increase in diversity of promotional material	Active Travel Group	To be determined	To be determined
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Strategic Planning Sustainability & Transportation Committee	14 June 2016
Is the final decision on the recommendations in this report to be made at this meeting?	Yes

Response to Consultation by Kent County Council on Final Review of Funded Bus Services

Final Decision-Maker	Strategic Planning, Sustainability & Transportation Committee
Lead Head of Service	Rob Jarman: Head of Planning and Development
Lead Officer and Report Author	Steve Clarke: Principal Planning Officer Spatial Policy
Classification	Public
Wards affected	All

This report makes the following recommendations to this Committee:

1. Councillors note for information the response attached at Appendix Two, that has already been forwarded to the Kent County Council Public Transport Team.

This report relates to the following corporate priorities:

- Keeping Maidstone Borough an attractive place for all
- Securing a successful economy for Maidstone Borough

The maintenance of good public transport connections is an integral part of the Council’s Integrated Transport Strategy. Good bus services will assist in the development of the local economy and also in making the Borough an attractive place for all.

Timetable	
Meeting	Date
Strategic Planning, Sustainability & Transportation Committee	14 June 2016

Response to Consultation by Kent County Council on Final Review of Funded Bus Services

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 Kent County Council has been undertaking a review of its funding of un-commercially viable bus services across the County, in the light of continuing pressure on financial resources and the need to make further savings in the order of £800k in the financial year 2016/17. Working with bus operators some £250k worth of savings had been found, leaving a shortfall of around £500k. This has resulted in a review of County funded bus services and services where the subsidy can be stopped or reduced and where alternative services can be provided have been identified. A consultation exercise on the proposed changes took place between 21 March 2016 and 15 May 2016. The Consultation document is attached at Appendix One
 - 1.2 Attached to this report at Appendix Two, is the response to the County Council sent by Officers and the report recommends that Councillors note this for information.
-

2. INTRODUCTION AND BACKGROUND

- 2.1 As indicated above, the County Council has recently concluded a review of bus services it directly funds.
 - 2.2 In terms of the proposed changes to supported bus services within Maidstone Borough, only two are affected; the service 89 to Coxheath directly, and a consequential change to service 5 to Staplehurst/Hawkhurst.
 - 2.3 The consultation document indicates that the current evening journeys for Arriva route 89 to Coxheath will be withdrawn with a potential saving of £23,677. The withdrawn journeys will however, be replaced by Arriva route 5 which will divert into the village of Coxheath in the evenings to provide a replacement for the withdrawn 89 journeys on a similar but not directly comparable level.
 - 2.4 An Equality Impact Assessment (EqIA) has been undertaken by the County Council assessing the impact of the proposed changes which indicates that as a relatively high proportion of older passengers travelling on an English National Concessionary Travel Pass use the services, additional weight in assessing the potential impact on these users will need to be given.
 - 2.5 The final decision on the proposed service changes across the County has not yet been taken. It is anticipated that the results of the consultation and the proposed changes will be considered by County Members in July 2016. Councillors will also have results of bus passenger surveys when final decisions are made.
-

3. REASONS FOR RECOMMENDATION

- 3.1 Given the work programme leading to the submission of the Local Plan for examination on May 20th, it was not possible to report the Consultation to this Committee previously. Officers also secured agreement that it would be possible to forward the response as soon as possible after the 15 May given the on-going Local Plan work.
- 3.2 It is not considered that the proposed withdrawal of evening services to Coxheath on route 89 would have an unacceptable impact on local bus service provision, as consequential changes to the Route 5 are proposed to provide a similar replacement service to Coxheath in the evenings. The service 5 does already divert into Coxheath on a few journeys on Sundays.
- 3.3 It will be necessary to ensure appropriate publicity for the changes if they occur. In addition, it is also hoped that with identified development in Coxheath that the re-introduction of Route 89 evening services on a commercial basis may be possible in the future.
- 3.4 The County Council have also been advised that this Council stresses the importance of on-going dialogue with the County on public transport issues in particular support for improved bus services from Maidstone to the Rural Service Centres and larger villages as an integral part of the Integrated Transport Strategy and traffic mitigation proposals.
- 3.5 Councillors are therefore asked to note the attached response that has already been sent to the County Council.
-

4. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION

- 4.1 The response attached at Appendix Two has already been forwarded to the County Council. The County will consider all the responses it has received and will consider these alongside bus surveys and the Equality Impact Assessments when final decisions are made by County Members, which is anticipated to be in July 2016.
-

5. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
Impact on Corporate Priorities	The maintenance of good public transport connections is an integral part of the Council's Integrated Transport Strategy as it seeks to encourage modal shift. Good bus services will assist in the development of the local economy and also in	Rob Jarman: Head of Planning & Development

	making the Borough an attractive place for all.	
Risk Management	No specific implications arise	Rob Jarman: Head of Planning & Development
Financial	No specific implications arise	Head of Finance & Resources
Staffing	No specific implications arise	Rob Jarman: Head of Planning & Development
Legal	No specific implications arise	Kate Jardine: Team Leader Planning, Mid Kent Legal Services
Equality Impact Needs Assessment	An EqIA has been undertaken by KCC. This will be further reviewed as the process moves forward. The EqIA indicates that the changes may have a potentially greater impact on older persons using bus services as they represent a significant proportion of existing users.	Anna Collier: Policy & Information Manager
Environmental/Sustainable Development	No specific implications arise	Rob Jarman: Head of Planning & Development
Community Safety	No specific implications arise	Rob Jarman: Head of Planning & Development
Human Rights Act	No specific implications arise	Rob Jarman: Head of Planning & Development
Procurement	No specific implications arise	Rob Jarman: Head of Planning & Development & Head of Finance & resources
Asset Management	No specific implications arise	Rob Jarman:

		Head of Planning & Development
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6. REPORT APPENDICES

The following documents are to be published with this report and form part of the report:

- Appendix 1: Final review of KCC Funded Bus Services Consultation Document
 - Appendix 2: MBC response to the consultation dated 19 May 2016
-

Review of KCC Funded Bus Services

Consultation document
and questionnaire

146

Have your say

Kent County Council subsidises around 3% of bus journeys in Kent. Find out why we need to reduce our funding, and tell us how this could affect you.

kent.gov.uk/busreview
Consultation closes 15th May 2016

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1. Introduction

Bus services across the UK were privatised (deregulated) in 1985. Since then, many routes in Kent have been run by commercial bus companies, such as Arriva or Stagecoach. Kent County Council (KCC) has no involvement with these services, which are licensed by the Department for Transport.

But not all of Kent's bus services are run on a purely commercial basis. For the last 30 years KCC has subsidised some routes which, while not commercially viable, have been considered important to the needs of the communities and passengers they serve.

We've worked hard to protect these subsidies, but as central government funds have been reduced we've had to make savings, changing the way we work and spending less. We've worked hard to do this without any noticeable impacts for bus passengers, and have already saved over £1m.

Further budget cuts mean that we have to do more.

During the 2016/17 financial year, we need to save another £800k from this budget and this will mean that we will need to stop the subsidies for some services.

This is not something we want to do and we continue to work hard to find new solutions. We have explored budget

saving options with bus operators to ensure that, wherever possible, services will continue to operate or alternative services can be provided. Recent work with bus operators has indicated that they can help us save a further £250k without any noticeable impact on the passengers but we still have a shortfall of around £500k that we need to find. To do so, we have identified services with operators where we can stop or reduce the subsidy but where some alternative service can be provided. However, it is clear that some services will change or the level of service will have to reduce and for this reason we are inviting your comments to ensure that we understand the impact of these changes on you.

No final decisions have been made. All subsidised services have been assessed using our approved criteria (detailed later in this document) and with bus operators, we have identified a list of services where they can potentially help us to continue to provide some service with less subsidy. While our approach seeks to protect those bus services where the impact on passengers is greatest, we do understand that any changes may have an adverse impact on existing bus passengers and we need you to tell us how the proposed changes will affect you.

Your views matter

We would like to hear your views as they will be essential to help us make final decisions. Council Members will take them into account alongside bus surveys and Equality Impact Assessments when making a final decision in July 2016.

We want to hear your views on:

- How the proposed changes could impact you
- Our approach
- The assumptions we have made in the draft Equality Impact Assessments
- Any additional information that you think we need to consider about the potentially affected routes

You can give your opinion by completing the questionnaire online at www.kent.gov.uk/busreview. Alternatively you can complete the questionnaire at the end of this document and return it to Freepost KENT COUNTY COUNCIL BUS FUNDING REVIEW.

This consultation will run for 8 weeks from 21st March until 15th May 2016 (inclusive).

An Easy Read version of this document and the questionnaire is available on our website www.kent.gov.uk/busreview or upon request.

To request hard copies of any of the consultation documents or for any other formats, please email alternativeformats@kent.gov.uk or telephone on 03000 421553.

2. Bus services in Kent

Bus services in Kent fall into two categories:

- Commercially operated services
- Subsidised services

Since bus deregulation in 1985, bus operators in Kent such as Arriva and Stagecoach have been able to choose to run routes on a commercial basis, where there are enough passengers to fund the service. Around 97% of services in Kent are run in this way, without any funding from Kent County Council (KCC). That means that we have no say over routes, timetables or fares. More than 600 services are provided on this basis by over 50 operators.

Supporting non-commercial routes

Local Authorities can choose to subsidise operators to run other (non-commercially viable) services if they believe they are needed by the communities and passengers they serve.

KCC has a long tradition of supporting public transport in Kent and invests around £50m of public money into the County's bus network each year. We also work closely with bus operators through our Quality Bus Partnerships, helping them to improve services.

These activities have helped sustain a comprehensive network of buses in Kent on which over 50 million journeys are made each year. Of these, around 4 million journeys are made on services paid for by KCC and they are highly valued by the bus users.

Despite significant financial pressures, our commitment to bus travel has meant that until recently we have been able to protect our bus subsidy budget. This has enabled us to continue to provide the majority of our bus services without change or reduction. In 2015/16 we spent £6.4m supporting around 150 services that would otherwise not operate.

At a glance

2015/16

Number of bus journeys in Kent: over 50 million

Number of bus journeys made on subsidised routes: 4.1m

% of bus journeys subsidised by KCC: approximately 2.3%

Number of KCC subsidised contracts: 150

KCC subsidy: £6.4m

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How do we subsidise Kent's bus network?

Directly

Route subsidies

Buying season tickets

Indirectly

English National Concessionary Travel Scheme

Young Person's Travel Pass

Kent 16+ Travel Card

Capital Investment (vehicles, bus stops etc.)

3. Why do we need to change?

Over the past five years Council budgets have come under increasing pressure as Central Government has reduced its funding year on year. KCC has already had to reduce its revenue expenditure by £433m since the start of 2011-12 and the budget for 2016-17 requires a further £80.8m of savings.

Savings made to date have focussed on how we work and on reducing spending across services provided by KCC. We have reduced these budgets as much as we can in many instances. As a consequence, to meet our further savings targets, we can no longer fully protect our bus subsidy budget.

We have already made over £1m of savings by working with bus operators to re-plan routes and through a greater use of Community Transport operators. We have made these changes without any noticeable impact on bus passengers. Also, we have recently identified a further £250k worth of savings but we still need to reduce our spending by around £500k in the next financial year.

We will continue to work with bus operators to explore more imaginative options for service provision and look for new sources of funding, but it is likely that some services and journeys at certain times and on certain days will change or have to be reduced.

We understand that this is a very sensitive area and that any loss of a bus service may have a real and negative impact on its users. The pages that follow explain the approach that we have developed to help us ensure that we make decisions based on a full understanding of the impact on our residents.

4. How do bus subsidies work?

All Local Transport Authorities have a duty to consider funding bus services that are not provided commercially. These are services which:

- Are considered important to the communities and passengers they serve
- Provide transport links to key services that could not otherwise be accessed

Authorities are not required to provide these services and can choose which services to support.

What currently happens in Kent?

We use a set of criteria to guide our decision making. The criteria has been approved by County Council Members and ranks services based on cost, usage, journey purpose and the availability of other forms of transport (such as the rail network).

Using these criteria we will consider supporting a non-commercial bus service if its main purpose meets one or more of the following journey activities:

- Access to work
- Access to learning
- Access to healthcare

- Access to food shopping

Next, services are ranked in priority order based on the times and days of the week on which they operate and the cost per passenger journey (the cost of the contract divided by the number of journeys made on it). The table below shows how we prioritise services in this way.

Priority	Days of operation	£ Per Passenger Journey (KCC subsidy)
1	Any day of the week	Less than £3
2	Monday to Friday	£3 to £5
3	Monday to Friday	Over £5
4	Saturday	£3 to £5
5	Sunday and evening	£3 to £5
6	Saturday, Sunday & evening	£5 to £7
7	Any day	Over £7
8	Poorly performing contracts with very limited implications	Regardless of cost

5. Our approach to savings

The Council is very aware that any change or withdrawal to a bus service will have a negative impact on users who in many instances will have made personal arrangements around it. Our approach seeks to minimise these impacts as far as possible by taking account of:

- The Council's criteria for supporting bus services (detailed on page 7)
- Equality legislation (the Equality Act 2010) (detailed on page 14)
- Feedback from the public received through this consultation

Why do we need these additional steps?

If used alone, our normal criteria-led approach would allow us to simply rank services in accordance with the eight priority groups (see table on page 7). We would be able to identify contracts to the value of the £500k required saving, working from the bottom up. This would place greater prominence on the financial and statistical performance of contracts, regardless of the impact on the passengers.

In many instances, this would result in the removal of services providing for vulnerable groups, workers, scholars and services that represent the only public transport for a number of rural villages. We do not favour this approach and have instead developed an alternative way of reducing our expenditure which will have a less significant impact on Kent residents.

A thorough approach

Our approach seeks to protect the most vulnerable groups of society and the services that are most needed.

We want to protect services where their withdrawal would leave users with no other public transport, or where they are meeting a particular need, or serving a vulnerable group of society. Where we have identified that services and journeys are the only bus for rural villages, cater for school runs, or that enable the only means of people getting to work etc, we have tried to protect them from change. We will also take account of Equalities legislation and consider the impact on identified groups who could be more adversely affected by changes to bus services.

Our Kent Karrier services, which provide limited transport for the elderly, the mobility impaired and for very rural areas would also be unaffected.

6. Services that might be affected

No final decisions have been made. We have identified the services for possible subsidy withdrawal having understood what operators might be able to run instead. But we understand that this will mean changes and reductions and want to take account of your comments (through this consultation) and of the further information we gather through our ongoing bus inspections before we reach any final decisions.

The need to protect the most valued services means that we are proposing to focus potential savings on those bus services which fall into the following three main categories:

- Services where the areas served have other bus services available
- Services where it may be possible to change or reduce the level of service rather than withdraw it completely

- Early morning and evening services (where there would still be services earlier or later in the day or on other days of the week)

If these services stopped running there would still be other services or journeys on other days of the week or at different times of the day.

A summary table of the services identified for subsidy reduction is shown below. This does not mean that these services are going to stop; it means that they may change or reduce in some way.

The bus timetables for these services, showing the journeys currently funded by KCC, are available at www.kent.gov.uk/busreview or on request.

Summary of services for review:

Service No.	Operator	Route	What KCC pays for	Summary of proposed changes	Estimated saving
2	Stagecoach	Ashford to Rolvenden	Evening journeys Monday to Saturday	The 22:05 Ashford to Rolvenden and 22:49 Rolvenden to Ashford journeys will no longer run. The other journeys will not be funded by KCC but will continue to be provided by Stagecoach without subsidy.	£33,710
89	Arriva	Maidstone to Coxheath	Evening journeys Monday to Saturday	Evening journeys will be withdrawn. The route will be replaced by evening journeys on service 5, which will divert to serve Coxheath providing a similar level of service.	£23,677
5	Arriva	Maidstone to Hawkhurst	Evening journeys Monday to Saturday	This service will divert via Coxheath in the evenings to provide a replacement to cover the withdrawal of service 89 (above).	(included above)
89	Stagecoach	Dover to Folkestone	Evening journeys Monday to Saturday	The 19:43 and 21:57 from Dover and 22:27 from Elvington will no longer run. The other journeys will not be funded by KCC but will continue to be provided by Stagecoach without subsidy.	£66,391

Service No.	Operator	Route	What KCC pays for	Summary of proposed changes	Estimated saving
102	Stagecoach	Dover to Lydd	Evening journeys Monday to Saturday	The 20:35 journey from Dover will run as far as New Romney. The current 22:06 from Lydd will start from New Romney at 21:48. The 21:06 journey from Lydd will terminate at Folkestone. The 22:40 and 23:35 journeys from Dover to Folkestone will be replaced by a journey at 23:05. The 22:05 and 23:05 journeys from Folkestone to Dover will be replaced by a journey at 22:35.	(included above)
123	Nu-Venture	Kings Hill to West Malling Station	All journeys Monday to Friday	Service 123 will be withdrawn. Instead a new X1 service will be introduced which will operate between Kings Hill and Maidstone via West Malling Station, which alongside other existing services will provide similar links.	£77,748
203	Autocar	Benover to Paddock Wood	Monday and Wednesday Shopper Bus	The service will no longer run on Mondays. The Wednesday service would continue unchanged.	£10,616
204	Autocar	Tonbridge to Underriver	Two round trips on Monday to Friday	The service will no longer run on Wednesdays. The rest of the service continues unchanged on all other days.	(included above)

Service No.	Operator	Route	What KCC pays for	Summary of proposed change	Estimated saving
205	Arriva	Tonbridge to Paddock Wood	Saturday service	KCC will no longer fund this service. Autocar will provide a reduced level of service without subsidy from KCC.	£20,286
402	Arriva	Tonbridge to Hildenborough	The 17:03 journey on a Saturday.	This journey will be withdrawn.	(included above)
217	Arriva	Trench Wood to Ramslye via Tonbridge and Tunbridge Wells	Evening journeys Monday to Saturday	The Tunbridge Wells to Ramslye section will be withdrawn but will be covered with existing service 28. Other journeys will not be funded by KCC but will continue to be operated by Arriva without subsidy.	£42,797
477	Arriva	Swanley to Dartford	Early morning and evening journeys Monday to Saturday	The morning journey and some evening services will continue to operate without subsidy but the evening service will finish at 21:00 on Mondays to Fridays and 22:00 on Saturdays. The evening service from Swanley to Orpington will stop entirely.	£41,299
12RL	Clarkes	Tenterden to Headcorn Railway Station	Monday to Friday commuter service	This service will be withdrawn. KCC are arranging for Arriva to make changes to the timetable for the existing number 12 service, which will provide cover for some 12RL journeys.	£26,580

Service No.	Operator	Route	What KCC pays for	Summary of proposed change	Estimated saving
14A	Stagecoach	Canterbury to Deal	Evening journeys Monday to Saturday	The existing 22:00 journey from Canterbury will run at 22:35. The 22:50 from Canterbury and 23:30 from Sandwich will no longer run. Other journeys will continue to be operated by Stagecoach without subsidy.	£21,122
15 / 15A	Stagecoach	Dover to Sandown	Evening journeys Monday to Saturday	The 17:47 and 18:56 from Deal to Sandown and the 17:54 and 19:03 from Sandown as far as Deal will stop entirely and will not extend to Sandown after 16:55. Other journeys will continue to be operated by Stagecoach.	£19,023
3 / 3B	Stagecoach	Canterbury to Faversham	Evening journeys Monday to Saturday	The service will continue to be operated by Stagecoach without subsidy but will finish after 21:00.	£33,004
541 / 542 / 544	Regents Coaches	Elvington to Dover, Walmer to Sandwich, Walmer to Canterbury	Off peak shoppers services on Monday to Saturdays	The service will be reduced to operate on Tuesdays, Wednesdays and Thursdays only.	£20,000

7. How will we make a final decision?

We will score the service changes proposed based on an overall 'Impact Assessment' which takes account of Equality Impact Assessments, your comments and the council's criteria. Although we need to make the saving, if a service scores highly then this will alert us to the fact that there might be a particularly high impact and we will consider if there are alternative solutions or ways of making the saving.

Why (and how) do we use Equality Impact Assessments (EqIA)?

KCC carries out Equality Impact Assessments on proposed service changes, new services, and changes to policies. They help ensure that our services / policies are accessible and fair, and try to ensure that they do not cause any direct or indirect negative impacts on protected groups. They also help us to make informed decisions and meet our statutory obligations under the Public Sector Equality Duty / Equality Act 2010.

An EqIA focusses on ten core areas:

- Age
- Disability
- Gender
- Gender identity

- Race
- Religion / belief or none
- Sexual orientation
- Pregnancy and maternity
- Marriage and civil partnership
- Carer's responsibilities

By carrying out an EqIA for each service we can understand which of the groups listed above will be most affected by the proposed changes. This helps us to put in place measures to protect those groups and also to identify those services and journeys that are meeting the most valuable social need.

Equality Impact Assessments for each of the services identified for change are available to view online at www.kent.gov.uk/busreview or upon request. Please read these assessments and tell us if we have made the right assumptions by completing the consultation questionnaire online or at the end of this document.

We have also carried out an EqIA on the Council's scoring approach, which is also available to view online (hard copies are available on request).

8. Our scoring approach in detail

We have started by assessing the impact of any bus withdrawal in the knowledge that this will always have a negative effect for anyone that uses the service. Against a standard Risk Matrix we have determined that any bus service withdrawal would have an Impact Score of 12 mainly because of the 'likely' and 'significant' impact on the users of the service. If you would like more information on this please visit www.kent.gov.uk/busreview.

Applying KCC's criteria

KCC's criteria for the support of socially necessary bus services identifies that financial support will be prioritised to bus services and journeys that provide the only access to one or more of the following :

- Education
- Employment
- Healthcare (hospital appointments, doctors, dentists etc.)
- Essential (food) shopping

Using responses to this consultation, our inspections, and other engagement and information, we will identify the services and journeys being used for these purposes. We will clarify where these activities could not be completed if those services or journeys were withdrawn.

An additional point will be added to the overall Impact Assessment Score of those services or journeys that meet this criteria.

Examples

In making these assessments, the Council will take account of the availability of other bus services and journeys possibly available at different times or on different days of the week. For example, if an early morning journey is taking workers to start a specific shift time then a later journey might not be usable, in which case the additional point would be added to the overall Impact Score.

However, if a Sunday service is being used to complete food shopping and this could be completed on the remaining Monday to Saturday service, then it would be assumed that there is little impact and no points would be added.

Understanding how equality impacts our scoring approach

We will then use what we know about the service and statistical information to identify if the service is used by particular types of passenger (for example, older people or disabled passengers) or for certain journey purposes.

Our initial EqIA has identified that bus passengers falling into the categories of Age (older people), Disability or those with Caring responsibilities could be more adversely affected by bus service changes. This is because they might have a greater reliance on bus services than other groups. Where services are identified as carrying older or disabled passengers and those with caring responsibilities we will add points to the overall Impact Score.

Although members of other groups identified (Gender, Race etc.) will be adversely affected by any service change, it is not considered that this impact is any greater than any other bus passengers and therefore similar priority is unlikely to be given, unless there are specific circumstances applying to a particular user or group of users.

EqIAs will be updated throughout the process. We will use your consultation responses and our own inspections to update our information and the impact score for a service on an ongoing basis.

The scores for each service will be recorded as part of the EqIA which will include a table that calculates the score as in the example below.

Example scoring table

Service xx	
Impact Rating (12 unless unique circumstances are identified)	12
Evidence of Older passengers (2 points if identified)	2
Evidence of Disabled Passengers (2 points if identified)	0
Evidence of Passenger travelling as a 'Carer' (1 point if identified)	0
Does the service provide the only means of accessing employment for any passenger? (1 point if identified)	0
Does the service provide the only means of accessing education? (1 point if identified)	0
Does the service provide the only means of accessing healthcare? (1 point if identified)	0
Does the service provide the only means of accessing essential shopping? (1 point if identified)	1
TOTAL	15

9. In summary

1.

- **Through KCC's standard Risk Matrix Assessment**
- Services will be given an initial Impact Assessment Score based upon the likely impact.

2.

- **Through applying KCC's criteria**
- If a change is identified as affecting a journey that would be considered a priority against our criteria (such as, journey to work) then a further point would be added to the Impact Score.

3.

- **Through the initial Equality Impact Assessment (EqIA)**
- If, an older, or disabled or carer passenger is identified as using the service then a further point(s) would be added to the Impact Score.

4.

- **The EqIAs and the Impact Assessment Scores will be updated throughout the process**
- This will allow us to take account of what we learn about the services and their users. This will take account of all sources of information, but specifically the consultation responses and the inspections that we make.

5.

- **Compilation of data to inform our understanding of impact**
- Once the consultation is over we will use the responses and all of the other information we have gathered to update the EqIAs and Impact Assessment Score for each service. If a change has a 'High' Impact Score then we will consider if there are other solutions or ways of making the saving.

6.

- **Final decision in July**
- All of the information gathered will be used to inform the final decisions made by our Members. Any changes will happen in August.

10. How to get involved and have your say

By responding to the consultation, you will help us make informed decisions. No decisions have been taken and your views will be instrumental in the final decision taken by County Council Members.

Please let us know your views by visiting www.kent.gov.uk/busreview and completing the questionnaire.

Alternatively, complete the questionnaire at the end of this document and return to: Freepost, KENT COUNTY COUNCIL BUS FUNDING REVIEW.

If you require any further information about the proposed changes before responding to the consultation please contact us at public.transport@kent.gov.uk.

Easy read and Microsoft Word versions of this document and the questionnaire are available on our website or upon request.

If you require this or any of the consultation documents in another format please request these via email to alternativeformats@kent.gov.uk or by telephone on 03000 421553 (text relay service 18001 03000 421553). This number goes to an answer machine, which is monitored during office hours.

Please complete your questionnaire and return it to us by the 15th May 2016.

What happens next?

Your responses, along with the final Equality Impact Assessments, will be presented to KCC Members in July following which we will publish our results.

Any changes to bus routes resulting from decisions made by Council Members would most likely take effect in August 2016.

11. Glossary of terms

Community Transport Operators: *means non-commercial operators who have a different license to the likes of Arriva and Stagecoach. These operators are typically more voluntary in their nature and can often provide transport services for the Council at a lesser cost.*

Council Members: *means KCC's elected politicians, in this instance represented through those members forming part of relevant Cabinet Committees.*

Criteria for bus service support: *means the KCC Member approved way of ranking existing and new bus services to identify if they will or won't be paid for by KCC. The criteria take account of value for money and journey purpose.*

Deregulated: *means privatised and outside of the control of KCC. In this context, bus operators run the majority of routes without needing any permission from the Council who have no contractual relationship or control over them. Bus operators and the services that they run are managed by the Department for Transport who grant licenses to operators themselves and the routes that they chose to run.*

English National Concessionary Travel Scheme: *means the older person's bus pass. KCC has to pay operators for each journey made by the pass holder.*

Equality Impact Assessment: *means the assessments carried out by Council officers to understand the impact of proposed changes on existing bus users based on their protected characteristics. These are: age, disability, gender, gender identity, race, religion or belief, sexual orientation, pregnancy and maternity, marriage and civil partnership and carers' responsibilities.*

Equality Impact Legislation: *means the national legislation and the rules that govern sensitive decisions to protect identified groups (such as older people, disabled, religious groups, ethnic minorities etc.) from a more adverse impact on them when compared to other members of society.*

Kent Karrier: *means the KCC dial-a-ride services which provide door to door transport for older people and disabled members and for rural communities that do not have a bus or train service.*

Local Transport Authority: *means the local government organisation with responsibility for local transport (roads, drainage, public transport etc.) matters. In this instance, this means Kent County Council.*

Public Bus Service: *means a conventional public bus service which is available to any passenger wishing to pay a fare or carrying a valid pass. This does not include*

'Hired' services used specifically to carry particular groups, such as, school coaches and minibuses.

Quality Bus Partnership: *means a voluntary arrangement between KCC, the local District Council and bus operators. The partners work in collaboration with each other to improve bus services in the area.*

Socially Necessary Bus Service: *means a service which is not commercially viable to bus operators because of limited journeys made but which KCC pays for because it is considered important to bus users.*

Statutory Obligation: *means something that the Council has to do or provide because the Government regulations say that all Councils must do.*

Subsidy: *means payments made by the Council to bus operators to help them operate services that are not*

commercially viable because of low passenger usage but that the Council wants to see operated because they are important for bus passengers.

Young Person's Travel Pass: *means KCC's scheme that provides reduced cost bus travel for secondary aged school children. KCC has to pay operators for each journey made by pass holders.*

12. Consultation questionnaire

This questionnaire can be completed online at www.kent.gov.uk/busreview. Alternatively, fill in this paper form and return it to: **Freepost, KENT COUNTY COUNCIL BUS FUNDING REVIEW**

Please ensure your response reaches us by the 15th May 2016.

Q1. Are you completing this questionnaire on behalf of:

Select one box.

- Yourself (as an individual)
- A friend or relative – Please answer all of the questions in this questionnaire using their details and not your own.
- A District/Town/Parish Council
- A Voluntary or Community Sector Organisation (VCS)
- A Business
- Other, please specify:

Q1a. If you are responding on behalf of a Council/Business/VCS Organisation, please tell us the name of the organisation:

Q2. Please tell us your postcode: _____

(If you are responding on behalf of a friend or relative please provide their postcode.)

Q3. To what extent do you agree or disagree with the scoring method we are using to assess the overall impact of these changes? This is summarised on page 17 of the consultation document.

Select one box.

Strongly
agree

Agree

Neither
agree nor
disagree

Disagree

Strongly
disagree

Don't
know

Q3a. Please add any comments you have on the scoring method:

If you are responding on behalf of an organisation please go to question 6.

Q4. Do you, or the person you are responding on behalf of, travel on any of the bus services identified for review?

Select one box.

A summary table of the services identified for review can be found on pages 10 to 13 of the consultation document.

<input type="checkbox"/>	Yes
<input type="checkbox"/>	No

*If 'No' please go to question 6. If 'Yes' please tell us about your journey by continuing to question 5.
If you are responding on behalf of a friend or relative please answer all of these questions using their details.
If you use more than one service please use the extra response boxes provided.*

Q5. Using the following questions please tell us about your journey:

Q5a. What is the number of the bus service:

Q5b. Where does your journey start?

Q5c. Where does your journey end?

Q5d. How often do you use this service? *Select one box.*

<input type="checkbox"/>	Four or more days a week
<input type="checkbox"/>	One to three days a week
<input type="checkbox"/>	Once or twice a month
<input type="checkbox"/>	Once or twice a year
<input type="checkbox"/>	Other, please specify below:
<input type="text"/>	

Q5e. What is the purpose of your journey? *Select all that apply.*

<input type="checkbox"/>	To get to and from school/college/university
<input type="checkbox"/>	To get to and from work
<input type="checkbox"/>	To get to and from doctors, hospital and other healthcare appointments
<input type="checkbox"/>	To do essential food shopping
<input type="checkbox"/>	To get to and from leisure and social activities
<input type="checkbox"/>	To care for a friend or relative
<input type="checkbox"/>	Other, please specify below:
<input type="text"/>	

Q5f. If this service were to stop running what would you be most likely to do instead? *Select one box.*

<input type="checkbox"/>	Rely on friends / family / neighbours for lifts	<input type="checkbox"/>	Walk or cycle
<input type="checkbox"/>	Drive myself	<input type="checkbox"/>	Not travel for the reason I currently do
<input type="checkbox"/>	Travel by taxi	<input type="checkbox"/>	I don't know
<input type="checkbox"/>	Travel at a different time	<input type="checkbox"/>	Other, please specify below:
<input type="checkbox"/>	Travel on a different day	<input type="text"/>	

*If you travel on more than one of the bus services identified for review please use the additional boxes below.
If not, please go to question 6.*

What is the number of the bus service:

Where does your journey start?

Where does your journey end?

How often do you use this service? *Select one box.*

Four or more days a week

One to three days a week

Once or twice a month

Once or twice a year

Other, please specify below:

What is the purpose of your journey? *Select all that apply.*

To get to and from school/college/university

To get to and from work

To get to and from doctors, hospital and other healthcare appointments

To do essential food shopping

To get to and from leisure and social activities

To care for a friend or relative

Other, please specify below:

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If this service were to stop running what would you be most likely to do instead? *Select one box.*

- Rely on friends / family / neighbours for lifts
- Drive myself
- Travel by taxi
- Travel at a different time
- Travel on a different day
- Walk or cycle
- Not travel for the reason I currently do
- I don't know
- Other, please specify below:

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*If you travel on more than two of the bus services identified for review please continue below.
If not, please go to question 6.*

What is the number of the bus service:

Where does your journey start?

Where does your journey end?

How often do you use this service? *Select one box.*

<input type="checkbox"/>	Four or more days a week
<input type="checkbox"/>	One to three days a week
<input type="checkbox"/>	Once or twice a month
<input type="checkbox"/>	Once or twice a year
<input type="checkbox"/>	Other, please specify below:
<input type="text"/>	

What is the purpose of your journey? *Select all that apply.*

<input type="checkbox"/>	To get to and from school/college/university
<input type="checkbox"/>	To get to and from work
<input type="checkbox"/>	To get to and from doctors, hospital and other healthcare appointments
<input type="checkbox"/>	To do essential food shopping
<input type="checkbox"/>	To get to and from leisure and social activities
<input type="checkbox"/>	To care for a friend or relative
<input type="checkbox"/>	Other, please specify below:
<input type="text"/>	

If this service were to stop running what would you be most likely to do instead? *Select one box.*

<input type="checkbox"/>	Rely on friends / family / neighbours for lifts
<input type="checkbox"/>	Drive myself
<input type="checkbox"/>	Travel by taxi
<input type="checkbox"/>	Travel at a different time
<input type="checkbox"/>	Travel on a different day

<input type="checkbox"/>	Walk or cycle
<input type="checkbox"/>	Not travel for the reason I currently do
<input type="checkbox"/>	I don't know
<input type="checkbox"/>	Other, please specify below:
<input type="text"/>	

Q6. Please tell us how the proposed changes could affect you or the person / group you represent.

If you have provided details for more than one service in question 5, please clearly identify in your response below the service number for each journey / route you are commenting on.



If you are responding on behalf of an organisation please go to question 9.

If you are responding as an individual or on behalf of a friend or relative please continue to question 7.

Kent Karrier is a dial-a-ride service. It can take you from your home to set locations, such as the nearest town centre or supermarket. You are eligible to join if you have a medical condition that makes travelling on public transport difficult, you live in a rural area more than 500 metres from a bus route or railway station or are aged 85 or over.

Q7. Are you a member of the Kent Karrier scheme?

Select **one** box. *If you are responding on behalf of a friend or relative please answer using their details.*

- Yes
- No, I was not aware of the scheme but may be eligible
- No, I am not eligible for this scheme

Q8. Do you travel using any of the following bus passes?

Select **all** that apply. *If you are responding on behalf of a friend or relative please answer using their details.*

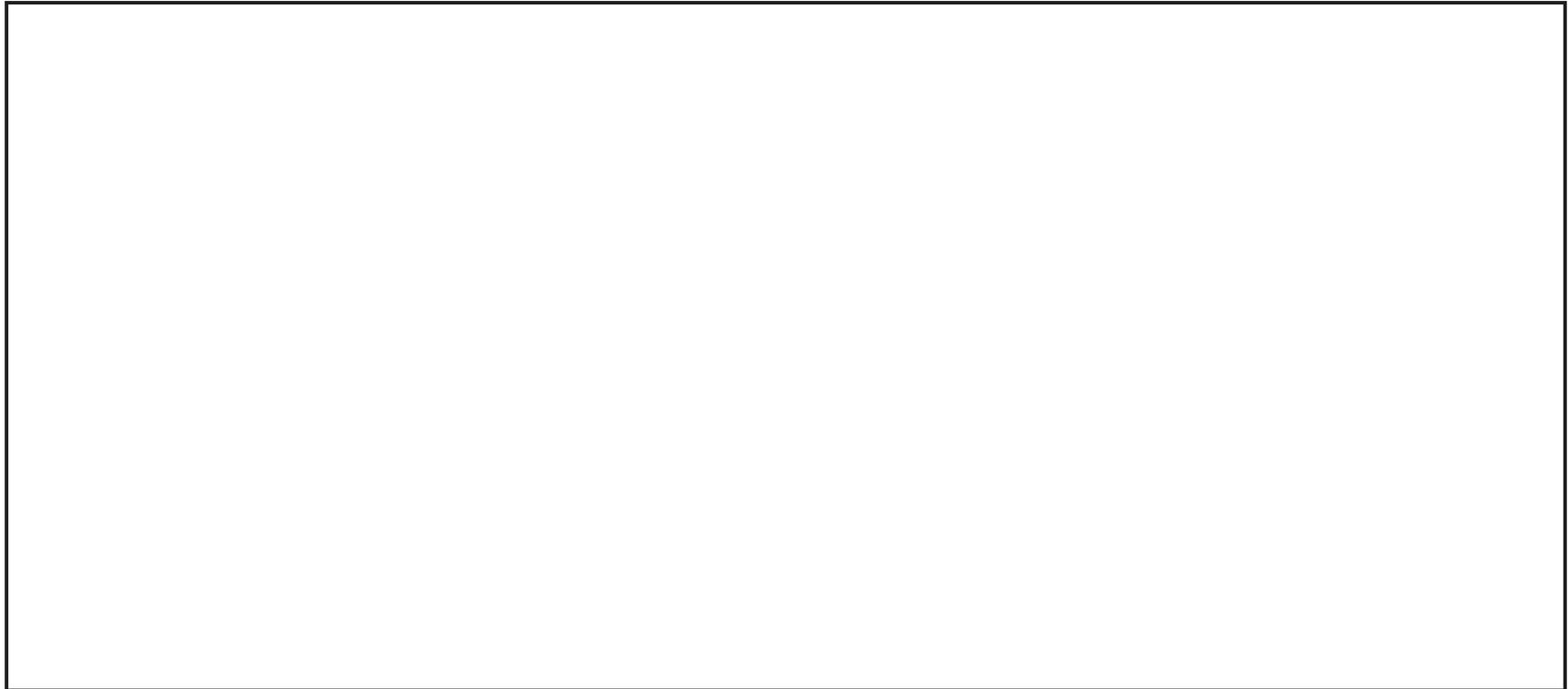
- Older Persons (English National Concessionary Travel Scheme)
- Mobility Impairment (English National Concessionary Travel Scheme)
- Companion (English National Concessionary Travel Scheme)
- Young Persons Travel Card
- Kent 16+ Travel Card
- No, I do not use any bus passes
- Other, please specify:

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Q9. We have completed initial Equality Impact Assessments (EqIA) on our scoring approach and for each of the service routes identified for review. An EqIA is a tool to assess the impact any service change, policy or strategies would have on age, disability, gender, gender identity, race, religion or belief, sexual orientation, pregnancy and maternity, marriage and civil partnership and carers' responsibilities. **We welcome your views.**

The EqIAs are available online at www.kent.gov.uk/busreview or on request.

Please write any comments here:



Future Engagement and Communication

Q10. If you would like to receive feedback on this consultation please provide your contact details below.

Our preferred method of communication is by email, however if you do not have an email address then please provide your postal address.

Name:

Email address:

Postal address:

You only need to answer these questions if you have responded as an individual or on behalf of a friend or relative. If you are responding to this questionnaire on behalf of someone else please answer these questions using their details and not your own.

It is not necessary to answer these questions if you are responding on behalf of an organisation.

About You

We want to make sure that everyone is treated fairly and equally, and that no one gets left out. That's why we're asking you these questions. We won't share the information you give us with anyone else. We'll use it only to help us make decisions, and improve our services. If you would rather not answer any of these questions, you don't have to.

Q11. Are you.....? Select one box.

<input type="checkbox"/>	Male
<input type="checkbox"/>	Female
<input type="checkbox"/>	I prefer not to say

Q12. Which of these age groups applies to you? Select one box.

<input type="checkbox"/>	15 or under	<input type="checkbox"/>	19-24	<input type="checkbox"/>	35-49	<input type="checkbox"/>	60-64	<input type="checkbox"/>	75-84
<input type="checkbox"/>	16-18	<input type="checkbox"/>	25-34	<input type="checkbox"/>	50-59	<input type="checkbox"/>	65-74	<input type="checkbox"/>	85 + over
<input type="checkbox"/>	I prefer not to say								

Q13. To which of these ethnic groups do you feel you belong? (Source: 2011 census)

Select **one** box.

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<input type="checkbox"/>	White English	<input type="checkbox"/>	Mixed White and Black Caribbean	<input type="checkbox"/>	Asian or Asian British Indian
<input type="checkbox"/>	White Scottish	<input type="checkbox"/>	Mixed White and Black African	<input type="checkbox"/>	Asian or Asian British Pakistani
<input type="checkbox"/>	White Welsh	<input type="checkbox"/>	Mixed White and Asian	<input type="checkbox"/>	Asian or Asian British Bangladeshi
<input type="checkbox"/>	White Northern Irish	<input type="checkbox"/>	Mixed other*	<input type="checkbox"/>	Asian or Asian British other*
<input type="checkbox"/>	White Irish	<input type="checkbox"/>	Black or Black British Caribbean	<input type="checkbox"/>	Arab
<input type="checkbox"/>	White Gypsy/Roma	<input type="checkbox"/>	Black or Black British African	<input type="checkbox"/>	Chinese
<input type="checkbox"/>	White Irish Traveller	<input type="checkbox"/>	Black or Black British other*	<input type="checkbox"/>	I prefer not to say
<input type="checkbox"/>	White other*				

*If your ethnic group is not specified in the list, please describe it here:

The Equality Act 2010 describes a person as disabled if they have a longstanding physical or mental condition that has lasted, or is likely to last, at least 12 months; and this condition has a substantial adverse effect on their ability to carry out normal day-to-day activities. People with some conditions (cancer, multiple sclerosis and HIV/AIDS, for example) are considered to be disabled from the point that they are diagnosed.

Q14. Do you consider yourself to be disabled as set out in the Equality Act 2010? *Select one box.*

Yes

No

I prefer not to say

Q14a. If you answered ‘Yes’ to Q14, please tell us the type of impairment that applies to you. You may have more than one type of impairment, so please select **all** that apply. If none of these applies to you, please select ‘Other’, and give brief details of the impairment you have.

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<input type="checkbox"/>

Physical impairment

Sensory impairment (hearing, sight or both)

Longstanding illness or health condition, such as cancer, HIV/AIDS, heart disease, diabetes or epilepsy

Mental health condition

Learning disability

I prefer not to say

Other, please specify:

--

A Carer is anyone who cares, unpaid, for a friend or family member who due to illness, disability, a mental health problem or an addiction cannot cope without their support. Both children and adults can be carers.

Q15. Are you a Carer? *Select one box*

Yes No I prefer not to say

Q16. Do you regard yourself as belonging to any particular religion or belief? *Select one box.*

Yes No I prefer not to say

Q16a. If you answered 'Yes' to Q16, which one applies to you? *Select one box.*

<input type="checkbox"/>	Christian	<input type="checkbox"/>	Hindu	<input type="checkbox"/>	Muslim	<input type="checkbox"/>	Any other religion, please specify below:
<input type="checkbox"/>	Buddhist	<input type="checkbox"/>	Jewish	<input type="checkbox"/>	Sikh	<input type="text"/>	

Thank you for taking the time to complete this questionnaire.

Privacy Kent County Council collects and processes personal information in order to provide a range of public services. Kent County Council respects the privacy of individuals and endeavours to ensure personal information is collected fairly, lawfully, and in compliance with the Data Protection Act 1998.

An 'easy read' version of this document is also available from our website or upon request. For any other formats or languages please email alternativeformats@kent.gov.uk or telephone on 03000 421553 (text relay service 18001 03000 421553). This number goes to an answer machine, which is monitored during office hours.

Kent County Council Public Transport Team
Review of Funded Bus Services

By e-mail only

Date: 19 May 2016
My ref: KCC-Busreview/sdc

Dear Sirs,

**Final review of KCC Funded Bus Services
Response to Consultation**

Please find attached the response of Maidstone Borough Council to the Consultation.

The Council is satisfied that the proposed changes to service 89 affecting Coxheath by the removal of direct evening services appear to be adequately compensated for by the diversion of Service 5 to serve the village in the evenings. It is understood that adding the 89 loop to the number 5 service is already in place on a Sunday and that it doesn't have a substantial impact.

As long as the changes are adequately signposted to current evening users of the service 89, and doesn't result in any loss of service (which it doesn't seem to), then Maidstone Borough Council does not object to the proposals.

It is also hoped that with identified committed development in the village of Coxheath, it may be possible in the future to reinstate 89 evening services to the village on a commercial basis.

The Council also stresses the importance of on-going dialogue with the County Council on public transport issues in particular support for improved bus services to and from Maidstone to the Rural Service Centres and larger villages which are seen as integral to the Integrated Transport Strategy and traffic mitigation proposals.

I trust you will take these comments into account.

Yours sincerely,

Steve Clarke

For Head of Planning & Development
Contact: Steve Clarke
☎ 01622 602418 ☎ 01622 602972
✉ steveclarke@maidstone.gov.uk

12. Consultation questionnaire

This questionnaire can be completed online at www.kent.gov.uk/busreview. Alternatively, fill in this paper form and return it to: **Freepost, KENT COUNTY COUNCIL BUS FUNDING REVIEW**

Please ensure your response reaches us by the 15th May 2016.

Q1. Are you completing this questionnaire on behalf of:

Select *one* box.

<input type="checkbox"/>	Yourself (as an individual)
<input type="checkbox"/>	A friend or relative – Please answer all of the questions in this questionnaire using their details and not your own.
<input checked="" type="checkbox"/>	A District/Town/Parish Council
<input type="checkbox"/>	A Voluntary or Community Sector Organisation (VCS)
<input type="checkbox"/>	A Business
<input type="checkbox"/>	Other, please specify: <input style="width: 150px; height: 20px;" type="text"/>

Q1a. If you are responding on behalf of a Council/Business/VCS Organisation, please tell us the name of the organisation:

Maidstone Borough Council

Q2. Please tell us your postcode: ME15 6JQ
(If you are responding on behalf of a friend or relative please provide their postcode.)

Q3. To what extent do you agree or disagree with the scoring method we are using to assess the overall impact of these changes? This is summarised on page 17 of the consultation document.
Select one box.

- | | | | | | |
|--------------------------|-------------------------------------|----------------------------|--------------------------|--------------------------|--------------------------|
| Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree | Don't know |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Q3a. Please add any comments you have on the scoring method:

If you are responding on behalf of an organisation please go to question 6.

Q4. Do you, or the person you are responding on behalf of, travel on any of the bus services identified for review?

Select one box.

A summary table of the services identified for review can be found on pages 10 to 13 of the consultation document.

<input type="checkbox"/>	Yes
<input type="checkbox"/>	No

If 'No' please go to question 6. If 'Yes' please tell us about your journey by continuing to question 5. If you are responding on behalf of a friend or relative please answer all of these questions using their details. If you use more than one service please use the extra response boxes provided.

Q5. Using the following questions please tell us about your journey:

Q5a. What is the number of the bus service:

Q5b. Where does your journey start?

Q5c. Where does your journey end?

Q5d. How often do you use this service? Select one box.

<input type="checkbox"/>	Four or more days a week
<input type="checkbox"/>	One to three days a week
<input type="checkbox"/>	Once or twice a month
<input type="checkbox"/>	Once or twice a year
<input type="checkbox"/>	Other, please specify below:

Q5e. What is the purpose of your journey? Select all that apply.

<input type="checkbox"/>	To get to and from school/college/university
<input type="checkbox"/>	To get to and from work
<input type="checkbox"/>	To get to and from doctors, hospital and other healthcare appointments
<input type="checkbox"/>	To do essential food shopping
<input type="checkbox"/>	To get to and from leisure and social activities
<input type="checkbox"/>	To care for a friend or relative
<input type="checkbox"/>	Other, please specify below:

Q5f. If this service were to stop running what would you be most likely to do instead? Select one box.

<input type="checkbox"/>	Rely on friends / family / neighbours for lifts
<input type="checkbox"/>	Drive myself
<input type="checkbox"/>	Travel by taxi
<input type="checkbox"/>	Travel at a different time
<input type="checkbox"/>	Travel on a different day

<input type="checkbox"/>	Walk or cycle
<input type="checkbox"/>	Not travel for the reason I currently do
<input type="checkbox"/>	I don't know
<input type="checkbox"/>	Other, please specify below:

If you travel on more than one of the bus services identified for review please use the additional boxes below. If not, please go to question 6.

What is the number of the bus service:

Where does your journey start?

Where does your journey end?

How often do you use this service? *Select one box.*

Four or more days a week

One to three days a week

Once or twice a month

Once or twice a year

Other, please specify below:

What is the purpose of your journey? *Select all that apply.*

To get to and from school/college/university

To get to and from work

To get to and from doctors, hospital and other healthcare appointments

To do essential food shopping

To get to and from leisure and social activities

To care for a friend or relative

Other, please specify below:

If this service were to stop running what would you be most likely to do instead? Select one box.

<input type="checkbox"/>	Rely on friends / family / neighbours for lifts
<input type="checkbox"/>	Drive myself
<input type="checkbox"/>	Travel by taxi
<input type="checkbox"/>	Travel at a different time
<input type="checkbox"/>	Travel on a different day
<input type="checkbox"/>	Walk or cycle
<input type="checkbox"/>	Not travel for the reason I currently do
<input type="checkbox"/>	I don't know
<input type="checkbox"/>	Other, please specify below:

If you travel on more than two of the bus services identified for review please continue below.
If not, please go to question 6.

What is the number of the bus service:

Where does your journey start?

Where does your journey end?

How often do you use this service? *Select one box.*

<input type="checkbox"/>	Four or more days a week
<input type="checkbox"/>	One to three days a week
<input type="checkbox"/>	Once or twice a month
<input type="checkbox"/>	Once or twice a year
<input type="checkbox"/>	Other, please specify below:

What is the purpose of your journey? *Select all that apply.*

<input type="checkbox"/>	To get to and from school/college/university
<input type="checkbox"/>	To get to and from work
<input type="checkbox"/>	To get to and from doctors, hospital and other healthcare appointments
<input type="checkbox"/>	To do essential food shopping
<input type="checkbox"/>	To get to and from leisure and social activities
<input type="checkbox"/>	To care for a friend or relative
<input type="checkbox"/>	Other, please specify below:

If this service were to stop running what would you be most likely to do instead? *Select one box.*

<input type="checkbox"/>	Walk or cycle
<input type="checkbox"/>	Not travel for the reason I currently do
<input type="checkbox"/>	I don't know
<input type="checkbox"/>	Other, please specify below:

Q6. Please tell us how the proposed changes could affect you or the person / group you represent.

If you have provided details for more than one service in question 5, please clearly identify in your response below the service number for each journey / route you are commenting on.

The Council is satisfied that the proposed changes to service 89 affecting Coxheath by the removal of direct evening services appear to be adequately compensated for by the diversion of Service 5 to serve the village in the evenings.

It is understood that adding the 89 loop to the number 5 service is already in place on a Sunday and that it doesn't have a substantial impact. So as long as the changes are adequately signposted to current evening users of the 89, and doesn't result in any loss of service (which it doesn't seem to), then Maidstone Borough Council does not object to the proposals.

It is also hoped that with the anticipated/committed development in the village of Coxheath, it may be possible in the future to reinstate 89 evening services to the village on a commercial basis.

The Council would welcome and stresses the importance of on-going dialogue with the County Council on public transport issues in particular support for improved bus services to and from Maidstone to the Rural Service Centres and larger villages which are seen as integral to the Integrated Transport Strategy and traffic mitigation proposals.

Other than the above the only comment some Members have made is that a disproportionate number of bus users are folk over 65. And on average only around two thirds of men over 65 and only 54% of women over 65 have Internet access. Therefore a predominantly on-line consultation feels inappropriate.

*If you are responding on behalf of an organisation please go to question 9.
 If you are responding as an individual or on behalf of a friend or relative please continue to question 7.*

Kent Karrier is a dial-a-ride service. It can take you from your home to set locations, such as the nearest town centre or supermarket. You are eligible to join if you have a medical condition that makes travelling on public transport difficult, you live in a rural area more than 500 metres from a bus route or railway station or are aged 85 or over.

Q7. Are you a member of the Kent Karrier scheme?

Select one box. If you are responding on behalf of a friend or relative please answer using their details.

Yes

No, I was not aware of the scheme but may be eligible

No, I am not eligible for this scheme

Q8. Do you travel using any of the following bus passes?

Select all that apply. If you are responding on behalf of a friend or relative please answer using their details.

Older Persons (English National Concessionary Travel Scheme)

Mobility Impairment (English National Concessionary Travel Scheme)

Companion (English National Concessionary Travel Scheme)

Young Persons Travel Card

Kent 16+ Travel Card

No, I do not use any bus passes

Other, please specify:

--

Q9. We have completed initial Equality Impact Assessments (EqIA) on our scoring approach and for each of the service routes identified for review. An EqIA is a tool to assess the impact any service change, policy or strategies would have on age, disability, gender, gender identity, race, religion or belief, sexual orientation, pregnancy and maternity, marriage and civil partnership and carers' responsibilities. We welcome your views.

The EqIAs are available online at www.kent.gov.uk/busreview or on request.

Please write any comments here:

The key is to ensure that elderly/disabled persons are not unduly disadvantaged by the proposed changes. Given that a replacement service for the withdrawn 89 is to be provided, it is anticipated that this may be achieved.

Future Engagement and Communication

Q10. If you would like to receive feedback on this consultation please provide your contact details below.

Our preferred method of communication is by email, however if you do not have an email address then please provide your postal address.

Name:

Steve Clarke

Email address:

steveclarke@maidstone.gov.uk

Postal address:

Maidstone Borough Council
Spatial Policy Team
Maidstone House
King Street
Maidstone
ME15 6JQ

**Strategic Planning,
Sustainability and
Transportation Committee**

14 June 2016

Is the final decision on the recommendations in this report to be made at this meeting?

Yes

Broomfield & Kingswood Neighbourhood Plan

Final Decision-Maker	Strategic Planning, Sustainability and Transportation Committee
Lead Head of Service	Rob Jarman, Head of Planning & Development
Lead Officer and Report Author	Cheryl Parks, Project Manager, Local Plan
Classification	Public
Wards affected	Bearsted; Detling & Thurnham; Downswood & Otham; Harrietsham & Lenham; Headcorn; Leeds; North Downs; Sutton Valence & Langley;

This report makes the following recommendations to this Committee:

1. That the Committee notes the report of the Examiner of the Broomfield & Kingswood Neighbourhood Development Plan
2. That the Committee agrees not to move the Plan to referendum

This report relates to the following corporate priorities:

- Keeping Maidstone Borough an attractive place for all -
- Securing a successful economy for Maidstone Borough - made Neighbourhood Plans will form part of the Development Plan for Maidstone and will be used in the determining of planning applications for the Neighbourhood Plan area.

Timetable

Meeting	Date
Strategic Planning, Sustainability and Transportation Committee	14 June 2016

Broomfield & Kingswood Neighbourhood Plan

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 This report sets out the findings of the independent examination of the Broomfield and Kingswood Neighbourhood Development Plan (“the Neighbourhood Plan”), and the subsequent engagement undertaken with the Parish Council.
 - 1.2 Following the agreement at the meeting of this Committee on 18 April 2016 to a revised protocol for Neighbourhood Planning processes, the decision on whether to move to referendum rests with this Committee.
 - 1.3 The timing of receipt of the examiner’s report was such that the deadline for the March meeting of this Committee had passed. The subsequent April Committee was reserved for matters relating to the Local Plan Submission, and with the new municipal year in May, it has meant delaying consideration of this report until June 2016.
-

2. INTRODUCTION AND BACKGROUND

- 2.1 Broomfield & Kingswood Parish Council successfully applied to designate the Parish as a Neighbourhood Area in October 2012. After working on producing the Neighbourhood Plan, it was formally submitted to the Borough Council on 21 October 2015 under Regulation 15.
- 2.2 Officers facilitated a full consultation on the Neighbourhood Plan between 6 November and 18 December 2015 (Regulation 16) as required by the Neighbourhood Planning (General) Regulations 2012 (“the Regulations”) and at the request of the Parish Council appointed Edward Cousins, BA, LL.M, Barrister, from a list of accredited examiners to formally examine the Neighbourhood Plan.
- 2.3 Throughout the production of the Neighbourhood Plan, there was on-going dialogue, both in meetings and in writing, between officers of the Borough Council and Broomfield & Kingswood Parish Council as well as with its appointed consultant, Designscape.
- 2.4 On several occasions, as evidenced in written minutes of meetings held, the Parish Council was advised of the risks associated with the approach taken in the Neighbourhood Plan, and the likelihood of a conflict with meeting the basic conditions, notably, accordance with adopted Local Plan policy, as required by the Regulations.
- 2.5 The Parish Council had received alternative advice from its consultant to that from officers at the Borough Council, and therefore opted to continue with the Neighbourhood Plan (as drafted) which sought enhancements to village facilities, including a village green, provided for alongside 20 new dwellings on a site adjacent to, but outside, the village envelope as identified on the policies map for the adopted Maidstone Borough Wide

Local Plan 2000. The proposed housing would comprise 12 market houses and 8 affordable homes.

- 2.6 Adopted policies ENV28 and H27 preclude development in the countryside, and only permit limited infill development of one or two dwellings in identified villages, of which neither Broomfield nor Kingswood are included. The site proposed in the Neighbourhood Plan is considered to be in an unsustainable location, lying outside of the village boundary, for 20 dwellings, would therefore be contrary to adopted policy.
- 2.7 New Planning Practice Guidance was issued on 19 February 2016, as the examination was concluding, and set out the requirement for up-to-date evidence on housing need to be considered in the development of Neighbourhood Plans.
- 2.8 It could therefore be argued that housing proposals in the Broomfield and Kingswood Neighbourhood Development Plan could be construed as 'helping' the Borough Council to meet its objectively assessed need for housing in the emerging Local Plan. However, draft policy in the emerging Local Plan does not propose any amendment to the village envelope of Broomfield or Kingswood, and does not identify either village in its sustainable settlements hierarchy, meaning that the site proposed is still situated in what is defined as "countryside". This, coupled with the emerging Local Plan proposing to meet its objectively assessed need through planning consents, pipeline supply, and sufficient allocations in sustainable settlements, suggests that the site proposed in the Neighbourhood Plan is not required to meet the Borough's housing need.
- 2.9 In considering national policy and guidance (NPPF, NPPG), the saved policies of the adopted Local Plan 2000 and proposed policies in the emerging Local Plan, the examiner concluded that the Broomfield & Kingswood Neighbourhood Plan did not comply with the legislative requirements in that the proposals were contrary to adopted policy because they encroached into the open countryside, and were not able to be considered 'minor development'. He further concluded that the Parish Council had not provided an evidence base to justify the scale of the proposed development in this particular location. As a result, he determined that he could not recommend modifications to the Neighbourhood Plan, as he deemed it not capable of remedy in its current format, nor recommend it be moved to referendum.
- 2.10 In his report summary, Mr Cousins suggested to the Parish Council that it may wish to pursue changes to the village boundary through representations to the Local Plan Regulation 19 consultation that was open at the time of his report being sent. However, no such representation was made.
- 2.11 Following receipt of the examiner's report, a further meeting was held with representatives of the Parish Council and Designscape. The Parish Council was disappointed that the examiner had concluded that the Neighbourhood Plan was not able to be taken forward, but acknowledged that they had been advised of the risks by officers. The Parish Council would consider its options and make a decision as to what it would do next.

3. AVAILABLE OPTIONS

- 3.1 There is only one option available to the Committee which is to accept the findings of the examiner as set out in this report (and at Appendix A) and agree that the Broomfield & Kingswood Neighbourhood Development Plan not be taken forward to referendum.

4. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS

- 4.1 The Committee is recommended to agree to the option as set out above at 3.1.

5. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION

- 5.1 Subject to the agreement of the Committee to the recommendation of this report, no further action will be required in relation to this Neighbourhood Plan.
- 5.2 Should opportunities arise for the Parish Council to review the Neighbourhood Plan contents in light of the examination of the Local Plan, it may wish to update and resubmit a Neighbourhood Plan for consideration but such a decision will rest with the Parish Council and be entirely dependent on the findings of the appointed Inspector who examines the Local Plan in due course. This may also avoid the loss of work undertaken to date.

6. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
Impact on Corporate Priorities	A Neighbourhood Development Plan once made will be part of the development plan for the borough, directly impacting on the Corporate Priorities through the determination of planning applications in the plan area.	Rob Jarman, Head of Planning and Development
Risk Management	There is limited risk relating to this report. Whilst the Parish Council were understandably disappointed with the findings, their decision to continue was contrary to advice received from officers.	Rob Jarman, Head of Planning and Development

Financial	There are no additional related costs.	Paul Riley, Section 151 Officer & Finance Team
Staffing	There are no staffing implications relating to this report and its recommendations.	Rob Jarman, Head of Planning and Development
Legal	Statute sets out the procedures to be followed in regard to Neighbourhood Planning. The Borough Council is obliged to follow statutory requirements. The proposals in this report underpin and support those procedures.	Kate Jardine, Team Leader (Planning), Mid Kent Legal Services
Equality Impact Needs Assessment	The needs of different groups are considered throughout the development of the plans.	Anna Collier, Policy & Information Manager
Environmental/Sustainable Development	Plans must have regard to sustainability and the natural environment including heritage assets as part of their policies. An assessment for the need for Strategic Environmental Assessment is carried out at an early stage and repeated at key stages of the plans development.	Rob Jarman, Head of Planning and Development
Community Safety	N/A	Rob Jarman, Head of Planning and Development
Human Rights Act	N/A	Rob Jarman, Head of Planning and Development
Procurement	There are no particular procurement requirements or considerations that are not already in place at this stage.	Rob Jarman, Head of Planning and Development & Paul Riley, Section 151 Officer
Asset Management	N/A	Rob Jarman, Head of Planning and Development

7. REPORT APPENDICES

The following documents are to be published with this report and form part of the report:

- Appendix A: Broomfield & Kingswood Neighbourhood Development Plan Examiners Report
-

8. BACKGROUND PAPERS

None

**BROOMFIELD AND KINGSWOOD
NEIGHBOURHOOD DEVELOPMENT PLAN**

2015 – 2031

INDEPENDENT EXAMINATION

A Report to Maidstone Borough Council

By

Edward Cousins BA, LL.M, Barrister

March 2016

SUMMARY AND FINDINGS

1. For the reasons stated in this Report the Kingswood and Broomfield Neighbourhood Plan as submitted for Examination does not comply with the basic conditions, and in particular condition 8(2)(e) of Schedule 4 to the Town and Country Planning Act 1990 (as amended). As submitted, therefore, the Proposed Plan unfortunately does not meet the basic conditions. Further, I do not consider that the Plan is capable of remedy in its current format.
2. As a consequence I cannot recommend that the Proposed Plan is submitted to a referendum.
3. I appreciate that this will be a great disappointment to the Parish Council and all those members of the community who have put in so much hard work over the years into achieving what they consider to be appropriate framework for their neighbourhood.
4. In the circumstances the Parish Council may wish to consider another route to achieve their aims, such as to seek a Development Order, or to propose an amendment to the recently published emerging Local Plan so as to seek a re-definition of the “Countryside” in so far as the boundaries relating to the Parish are concerned.

CHAPTER 1

Introduction

Background

Neighbourhood Planning

5. Neighbourhood planning is the process introduced by Parliament as enacted by the Localism Act 2011 (“the 2011 Act”). The intellectual purpose of neighbourhood planning is to seek to enfranchise those persons living and working in a community by providing the basis by which they can play a more active role in the process of deciding the future of their neighbourhood. They are able to play a role in the establishment of general planning policies for the development and use of land in the neighbourhood, such as to be involved decisions as to the siting, design and construction of new homes and offices. The neighbourhood plan sets a vision for the future. It can be detailed, or general, depending on what local people want.¹
6. In order to ensure that the new process is workable and effective the 2011 Act introduced the requisite amendments to the Town and Country Planning Act 1990 (as amended) (“the 1990 Act”), and the Planning and Compulsory Purchase Act 2004 (as amended) (“the 2004 Act”).² These amendments came into force on 6th April 2012 and were supplemented by detailed procedures provided for in the Neighbourhood Planning (General) Regulations 2012 (“the 2012 Regulations”).
7. The first step towards producing a neighbourhood plan is for a parish council, or other qualifying body, to define a “neighbourhood area” for which it considers that a plan should be presented, and to prepare a draft plan for that area. The local planning authority will provide assistance, where appropriate. The draft plan must meet what are referred to in the legislation as the basic conditions (“the Basic Conditions”). This means that the draft plan must in general conformity with national and other local planning policies; and it must conform to other provisions.³
8. The draft plan is made available for inspection within the area in question, and anyone can make representations.

¹ <https://www.gov.uk/neighbourhood-planning>

² The 1990 Act, ss 61E to 61P, Sch 4B (neighbourhood development orders); the 2004 Act, ss 38A to 38C (neighbourhood plans).

³ The 1990 Act, Sch 4B, para 8, applied by the 2004 Act, s 38A(3). For a detailed examination of the Basic Conditions and other statutory requirements, and see Chapter 3, below.

9. Once a draft plan has been prepared, and members of the community have had the opportunity to comment upon it, an independent examiner is appointed by the planning authority, with the consent of the qualifying body that produced the draft plan. The examiner must be someone who is independent of the qualifying body and the planning authority, has appropriate qualifications and experience, and has no interest in any land affected by the plan.⁴ The examiner then produces a report which contains one of three possible recommendations. One of these recommendations is that the draft plan should be submitted to a referendum.⁵
10. A referendum is then held on whether the draft plan should be “made”, subject to any changes recommended by the examiner and accepted by the planning authority. If more than 50% of those voting vote in favour of the plan, the planning authority must then make the plan.
11. Once it comes into force, the neighbourhood plan is part of the development plan for the area to which it relates, together with the “saved” policies of the relevant local plan, any plans for minerals and water disposal, and any saved policies of the relevant regional strategy. Thereafter it forms an integral part of the policy framework that guides the planning authority and the inspectorate in making all planning decisions in the area.

The submitted Neighbourhood Plan

12. Maidstone Borough Council (“the Borough Council”) is the local planning authority for its area for all purposes pursuant to the 1990 Act, and the 2004 Act, including the parish of Broomfield and Kingswood.
13. Broomfield and Kingswood Parish is described by the planning officer as a largely rural parish to the east of Maidstone, immediately south of the M20 motorway and east of Leeds Castle, the celebrated ancient monument. The main settlement in the parish, comprising approximately 500 dwellings, is Kingswood which is located in the south east corner, and the smaller hamlet of Broomfield is located to the north. The Parish is overwhelmingly agricultural in nature and lies between four and five miles from Maidstone.

⁴ The 1990 Act, Sch 4B, para 7(6), applied by the 2004 Act, s 38A(3).

⁵ The 1990 Act, Sch 4B, para 10(2)), applied by the 2004 Act, s 38A(3). For the appointment and role of the examiner, and the possible recommendations see paragraphs 16ff, below.

14. The parish council of Broomfield and Kingswood is a parish council within the terms of the Local Government Act 1972 (“the Parish Council”). It is a qualifying body for the purposes of the 2004 Act.⁶ The Parish Council is “...entitled to initiate a process for the purpose of requiring the local planning authority in England to make a neighbourhood development plan” for the whole or any part of its area specified in the plan.⁷ “A ‘neighbourhood development plan’ is a plan “.....which sets out policies (however expressed) in relation to the development and use of land in the whole or any part of a particular neighbourhood area”.⁸
15. Following a consultation process the Borough Council on 15th October 2012 approved the application made by the Parish Council to be classified as a neighbourhood plan area. It is stated in the Record of Decision that the Parish Council was considered to be a “relevant body” for the purposes of the 2011 Act.⁹ The plan area was considered acceptable in planning terms and conforms precisely to the parish boundaries.
16. The details of the process by which the submitted neighbourhood plan (“the Proposed Plan”) came into existence, and the dates on which each stage was reached, are set out in the *Broomfield and Kingswood Consultation Statement*, published by the Parish Council in April 2015.¹⁰ The plan-making process commenced on 1st March 2012, and a neighbourhood plan steering group was established shortly thereafter. The steering group then embarked upon an extensive consultation exercise between 2012 and 2015, and a draft of the Proposed Plan was provided to Maidstone Borough Council on 6th February 2015. The *Broomfield and Kingswood Consultation Statement* provides a comprehensive guide to the process, and an outline of the hard work that has been undertaken by the community in the production of the Proposed Plan.

Role of the Independent Examiner

⁶ See s 38A(1).

⁷ The 1990 Act, s 61F(1), (2), applied by the 2004 Act, s 38C(2)(a).

⁸ By virtue of section 38A(2).

⁹ See the 1990 Act s 61G(2), inserted by 2011 Act, sch 9, para 2.

¹⁰ See Chapter 2, below.

17. The role of the independent examiner (“the Examiner”) is to conduct an independent examination of the draft plan (“the Examination”) so as to test whether or not it meets the Basic Conditions, and to ensure that it complies with the various other statutory requirements contained in the planning legislation. In essence his or her role is to assess whether the draft plan is “sound”. If in the event that the draft plan does not comply with the various statutory requirements, the Examiner then is obliged to consider whether it can be altered so that it does so comply.

18. The Examiner then produces a report, which contains one of three possible recommendations, namely, whether:

- “(a) the draft plan is to be submitted to a referendum;
- (b) the modifications specified in the report are to be made to the draft plan, and that the draft plan as modified is submitted to a referendum; or
- (c) the proposal for a plan is to be refused.”¹¹

19. The recommended modifications can only be those that the Examiner feels are necessary to ensure that the draft plan complies with the Basic Conditions and the other relevant statutory requirements, or are needed for the purpose of correcting errors. The planning authority then decides whether it is willing to make any or all of those changes. If the changes are substantial, then they may have to be the subject of a further round of consultation.

20. The Basic Conditions¹² may be summarised as follows - namely whether the draft plan:

- (a) has proper regard to national policy and guidance;
- (b) contributes to the achievement of sustainable development;
- (c) is in general conformity with the strategic policies of the development plan for the area or any part of that area; and

¹¹ 1990 Act, Sch 4B, para 10(2), applied by the 2004 Act, s 38A(3).

¹² For a detailed analysis of the Basic Conditions, see Chapter 3, below.

(d) does not breach or is otherwise compatible with EU obligations, including the Strategic Environmental Assessment Directive 2001/42/EC and Habitats Directive 92/43/EEC

21. The further requirements of the Examiner, as defined in the 2012 Regulations, include considering whether the draft plan complies with the definition of a Neighbourhood Development Plan, and the provisions that can be made by a Neighbourhood Development Plan; and whether the draft plan is compatible with the European Convention on Human Rights. The Examiner may also make recommendations on whether the Neighbourhood Plan Area for referendum should extend beyond the Neighbourhood Plan boundaries.

Appointment of the Independent Examiner

My appointment

22. I have been appointed by the Borough Council to conduct the Examination of the Proposed Plan. I am independent of the Parish Council and the Borough Council. I have no interest in any land affected by the Proposed Plan.

23. I am an Associate Member of Francis Taylor Building having joined Chambers in October 2013 as a Legal Adviser, Mediator and Arbitrator. Prior to that until September 2003 I was in practice as a Chancery Barrister in Chambers in Lincoln's Inn until September 2003, when I was appointed to the salaried full-time judicial role as the Adjudicator to HM Land Registry. In October 2014 I retired from that position and joined FTB since when I have specialised in planning and related property issues. To that end I have been appointed to the Panel of NPIERS as an Examiner. I am also qualified to sit as a non-statutory Inspector and I have been retained in that role on a number of town and village green inquiries.

CHAPTER 2

The Process of the Examination

24. For the purposes of the Examination I have been supplied with the following documents:

- (1) the *Broomfield and Kingswood Submission Neighbourhood Plan, October 2015-2031*;
- (2) the *Broomfield and Kingswood Consultation Statement, April 2015*;
- (3) the *Basic Conditions Statement, February 2015*; and
- (4) the *Appraisal of Site Development Options, October 2013*.¹³

25. I have also been supplied with (or referred to) a number of other relevant documents, including the following:

- (1) the relevant policies of the *Maidstone Borough-wide Local Plan 2000* produced by the Borough Council (“the Local Plan”) saved in 2007;
- (2) the Local Development Scheme. This came into effect on 9th December 2015;
- (3) the recently published emerging consultation draft *Maidstone Borough Local Plan Publication (Regulation 19) 2016 to 2031* (“the Emerging Local Plan”);¹⁴
- (4) the *SEA and Habitat Regulation Assessment Screening Report* produced by Maidstone Borough Council in October 2015. The screening opinion concludes that SEA and HRA is not required for the Proposed Plan, i.e. a full assessment is unnecessary¹⁵;

¹³ For the purposes of this Examination I am satisfied that the *Broomfield and Kingswood Consultation Statement*, the *Basic Conditions Statement*, and the *Appraisal of Site Development Options* are all compliant with the legislative requirements in their documentary format, but subject to compliance with the overarching requirements of the Basic Conditions, see Chapter 3, below

¹⁴ This was produced after the submission of the Proposed Plan in February 2016. The consultation commenced on 5th February 2016 and is due to close on 18th March 2016. It is anticipated that the Emerging Local Plan will be adopted in Spring 2017. A number of the Local Plan saved Policies relevant to the Proposed Plan, and referred to below, will be superseded by the Emerging Local Plan Policies.

¹⁵ See paragraph 70 (b), below.

(5) the representations received by the Borough Council in response to the consultant carried out under regulation 16;¹⁶

The development plan

26. In this Examination, the development plan for the area of Broomfield and Kingswood consists principally of the saved policies of the adopted Local Plan, together with the proposed policies of the Emerging Local Plan which will eventually supersede those existing saved policies. In carrying out the Examination of the draft plan, the Examiner is required to consider the Basic Conditions and in particular, *inter alia*, whether it is in general conformity with the strategic policies contained in the development plan for the area (Basic Condition (e)).

The Emerging Local Plan

27. In February 2016 the Emerging Local Plan was produced by the Borough Council. It therefore was not available during the period when the Proposed Plan was put out for consultation. The current time-scale for its adoption is Spring 2017. Meanwhile the saved parts of the Local Plan will still govern planning decisions; and the Proposed Plan will still have to be “in general conformity with” its strategic policies.

28. As it is put by the Borough Council in the Emerging Local Plan (Chapter 2 - “Key Influences”)

“The Development Plan, which comprises adopted local plans and adopted neighbourhood development plans, is central to the planning system and is needed to guide the decision making process for land uses and development proposals. The Maidstone Borough Local Plan will supersede a number of adopted local plan policies, which are listed in Appendix C. Neighbourhood development plans, which are also called neighbourhood plans, are being prepared by a number of parish councils and neighbourhood forums. A neighbourhood plan attains the same legal status as the local plan once it has been agreed at a referendum and is made (brought into legal force) by the Borough Council. At this point it becomes part of the statutory development plan. Government advises that a neighbourhood plan should support the strategic development needs set out in the local plan and plan positively to support local development. Neighbourhood plans must be prepared in accordance with the

¹⁶ As set out in the spreadsheet generated by the Borough Council

National Planning Policy Framework and be in general conformity with the strategic policies of the adopted Maidstone Borough Local Plan. Whilst general conformity to an emerging local plan is not a legal requirement, the reasoning and evidence informing the local plan process may be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. Where neighbourhood planning has been undertaken before an up-to-date local plan is in place, the council has taken an active role in advising and supporting the local neighbourhood plan team, sharing evidence and information.”

29. This enforces the position that a local plan may post-date a neighbourhood plan; and also, that it must “reflect” the priorities contained in any relevant neighbourhood plan, and not repeat the non-strategic policies contained within it.

CHAPTER 3

The Basic Conditions – Overview

The legal requirement

30. In this Chapter the Basic Conditions are analysed. The requirement made in paragraph 8(1)(a) of Schedule 4B to the 1990 Act is for the Examiner to consider whether the Proposed Plan for Broomfield and Kingswood meets the Basic Conditions.¹⁷ Thereafter in this Report consideration is then directed as to whether the Proposed Plan meets the Basic Conditions.
31. The 2012 Regulations provide that the submission of a proposed neighbourhood plan by a qualifying body to a planning authority must be accompanied by a statement explaining how the plan meets the Basic Conditions, together with other statutory requirements.¹⁸ In the case of the Proposed Plan, a document entitled the *Basic Conditions Statement* dated February 2015 has been produced to accompany it. It provides summary of the measures that have been taken in this case to ensure that the Plan does meet the Basic Conditions.

The Basic Conditions

32. Paragraph 8(2) of Schedule 4B to the 1990 Act provides that a neighbourhood development plan meets the Basic Conditions if:

- “(a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make [the plan],
- (b).....
- (c).....
- (d) the making of [the plan] contributes to the achievement of sustainable development,
- (e) the making of [the plan] is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- (f) the making of [the plan] does not breach, and is otherwise compatible with, EU obligations, and

¹⁷ The 1990 Act, Sch 4B, para 8(1), applied by the 2004 Act, ss 38A(3), 38C(5)(b), (c). Sub-para 8(1)(c) does not apply to neighbourhood development plans.

¹⁸ The 2012 Regulations, Reg 15(1)(d); see below.

(g) prescribed conditions are met in relation to [the plan] and prescribed matters have been complied with in connection with the proposal for [the plan].”¹⁹

33. Basic Conditions (b) and (c), relating to the built heritage, apply to the examination of proposed neighbourhood development orders, but not to that of neighbourhood plans.

34. Only one further Basic Condition has been prescribed under paragraph 8(2)(g), as follows:

“The making of the neighbourhood development plan is not likely to have a significant effect on a European site ... or a European offshore marine site ... (either alone or in combination with other plans or projects).”²⁰

35. Further, a draft plan must meet all of the Basic Conditions specified in paragraph 8(2), if it is to be submitted to a referendum, not just some of them.

National policies and advice: the National Planning Policy Framework

36. In carrying out the Examination of a draft plan, and deciding whether to recommend that it should be submitted to a referendum, the Examiner is required to have regard to national policies and advice contained in guidance issued by the Secretary of State (see Basic Condition (a)).

37. The most significant national policies relevant to planning matters are set out in the *National Planning Policy Framework* (“the NPPF”). This was issued in March 2012. It replaced almost all of the Planning Policy Guidance notes and Planning Policy Statements (PPGs and PPSs) that were extant at that time.

38. The Government’s understanding of neighbourhood plan-making is summarised at paragraphs 15 and 16 of the NPPF, as follows:

¹⁹ 1990 Act, Sch 4B, para 8(2), applied by the 2004 Act, ss 38A(3), 38C(5)(d).

²⁰ 2012 Regulations, Sch 2, para 1.

“15. ... All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.

16. The application of the presumption will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:

- develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;
- plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan”

39. The core principles that should underpin all planning are then summarised at paragraph 17, and elaborated in relation to specific topics in the remainder of the NPPF. That paragraph provides as follows:

“17. Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should:

- be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency; ...”

40. The principal policies of the NPPF specifically relating to neighbourhood planning are as follows:

“183. Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need. Parishes and neighbourhood forums can use neighbourhood planning to:

- set planning policies through neighbourhood plans to determine decisions on planning applications; and
- grant planning permission through Neighbourhood Development Orders and Community Right to Build Orders for specific development which complies with the order.

184. Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development

for their community. The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.

185. Outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area. Once a neighbourhood plan has demonstrated its general conformity with the strategic policies of the Local Plan and is brought into force, the policies it contains take precedence over existing non-strategic policies in the Local Plan for that neighbourhood, where they are in conflict. ...”

41. Other policies directly relating to the making of neighbourhood plans are in paragraphs 28, 56-58, 69-70, 76-77, 97, 109-111, and 117.
42. More general policies relating to “plan making” are found throughout the NPPF, but they generally refer to the making of local plans. For example, paragraphs 47 and 158-159 contain important policies regarding the need to ensure an adequate supply of housing; but these specifically refer to action by local planning authorities. Nevertheless, since neighbourhood plans are to be in general conformity with strategic policies in local plans, those policies in the NPPF relating to local plans will still be indirectly relevant.
43. More generally, the NPPF sets out a whole suite of policies relating to a wide range of issues, including in particular transport, housing, design, climate change, the natural environment, and the historic environment. It is necessary for the Examiner to have regard to these where appropriate in carrying out the Examination.

Planning Practice Guidance

44. More detailed guidance and advice, expanding on the general policies in the NPPF, has been available since March 2014 on the Planning Portal website, as *Planning*

Practice Guidance (“PPG”).²¹ This guidance relates to a whole range of planning issues.

45. In particular, the PPG contains the following guidance:

“How should the policies in a neighbourhood plan be drafted?”

A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”²²

46. A policy that is not “clear and unambiguous” is thus not in accordance with the Basic Conditions.

47. The requirement that a policy should be distinct, reflecting local circumstances, is less straightforward. Many policies in proposed neighbourhood plans are to a greater or lesser extent generic policies that could apply to many if not all locations. However, the fact that a particular community has chosen to include a particular generalised policy in its plan reflects its awareness that the issue in question is of special relevance in its circumstances. The inclusion of such general policies thus does not of itself mean that those policies, or the plan as a whole, is not in accordance with the basic conditions.

Other national policies and advice

48. The reference in the first basic condition to national policies and advice is not limited to the guidance in the NPPF and the PPG. Historically, a plethora of Circulars, practice guidance notes and other such documents were in existence at an earlier stage. Fortunately, most of these were cancelled when the NPPF was produced in 2012. Those that survived, and in particular the 2007 practice guidance on *Strategic Housing Market Assessments* and *Strategic Housing Land Availability Assessments*, were cancelled in March 2014.

²¹ <http://planningguidance.planningportal.gov.uk/blog/guidance/>

²² PPG, ref ID: 41-041-20140306.

49. For the purposes of this Examination the assumption has been that the relevant national policies and advice are those that are now exclusively contained in the NPPF and the PPG.

Sustainable development

50. In carrying out an examination of a draft plan, The Examiner is also required to consider whether the making of it would contribute to the achievement of sustainable development (Basic Condition (d)).

51. Paragraph 6 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. Reference is then made to paragraphs 18 to 219 as constituting the Government's view of what sustainable development in England means for the planning system. It is then stated in the following paragraph:

“7. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy. “

52. The NPPF then explains that there is a presumption in favour of sustainable development:

“14. At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking.

For **plan-making** this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted.”

53. In paragraphs 15 and 16 specific reference is made to neighbourhood plans.

54. None of those who submitted written representations has referred to any other definition of sustainable development, or any other documents relating to it, that should be taken into account in this Examination of the Proposed Plan.

EU obligations

55. In carrying out the examination of a draft plan, the Examiner is also required to consider specifically whether the draft plan is likely to have a significant effect on

- (1) a European site (as defined in the Conservation of Habitats and Species Regulations 2010), or
- (2) a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c) Regulations 2007),

either alone or in combination with other plans or projects (additional basic condition (g)).²³

²³ 2012 Regulations, Reg 32; Sch 2, para 1.

56. More generally, the Examiner is required to consider whether the making of the draft plan is in general conformity with “EU obligations” (Basic Condition (f)).

57. The principal relevant EU obligation is under the EC directive on the assessment of the effects of certain plans and programmes on the environment (strategic environmental assessment, or SEA) (Directive 2001/42/EC). That requires, where plans and programmes are likely to have significant effects on the environment, that an environmental assessment be carried out at the time they are prepared and before they are adopted.

58. It is not considered that any of the policies in the Proposed Plan are likely to have significant effects on the environment, such that an SEA needs to be prepared.²⁴

59. The second EU obligation is that:

“any plan or project not directly connected with or necessary to the management of [a European site] but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s nature conservation objectives.”²⁵

This reflects the more specific requirement of Basic Condition (g), (see above).

60. The Examiner is not aware that any of the policies in the Proposed Plan are likely to have a significant effect on any European site.

61. None of those who submitted written representations has drawn attention to any other relevant EU obligation that the Examiner should take into account in my examination of the Proposed Plan. In particular, other potentially relevant EU obligations might arise under the Waste Framework Directive, the Air Quality Directive, or the Water Framework Directive. However, none of those would seem to be relevant in this case.

²⁴ See paragraph 25(4), above.

²⁵ Habitats Directive 92/43/EEC, article 6(3).

CHAPTER 4

The Broomfield and Kingswood Neighbourhood Plan

The Neighbourhood Plan Submission

62. In October 2015 the Parish Council submitted their draft plan. The background history to this was that shortly after the 2011 Act came into force the Parish Council decided to seek the views of the parishioners with regard to the consideration and production of a neighbourhood plan, the essential feature of which is to create a village green (“the Village Green”) surrounding which there will be the provision of 20 residential units, 8 of which will be affordable homes. The Forward to the Proposed Plan sets out the historical circumstances as to the meetings and the subsequent presentations that took place with this aim in mind.²⁶

The Neighbourhood Plan

63. The Neighbourhood Plan contains 6 sections, as follows:-

- Introduction;
- Background;
- Visual Statement;
- Aims and Objectives;
- Constraints and Opportunities;
- Neighbourhood Plan Policies and
- Delivery

Policy Proposal

64. The Policy Proposal is:-

“Policy VG1: Kingswood Village Green and the provision of new housing” and seeks that “permission will be granted for a Village Green and 20 new dwellings of land enclosed by Gravelly Bottom Road, Duck Pond Land and Chartway Street. The Village Green will be publicly available, and of at least 1 acre in size. It is proposed that there should be 12 “market houses” together with 8

²⁶ See paragraph 16, above.

“affordable houses suitable to meet the needs of the local community of Broomfield and Kingswood.”

The housing proposed lies immediately south of Kingswood Village, and is outside the village boundary. The affordable housing proposed is 40% of a total and is for local community needs.

65. In *Section 3 – Vision Statement Aims and Objectives* - the basis is what is proposed by the Parish Council is set out, namely to create the Village Green in Kingswood. The purpose of this will be to create a focal point for village life, and an open space for leisure and limited recreational use, and for somewhere for people to meet. It be connected to the existing village hall. At the same time the expressed purpose is to limit new residential development over and above that which is necessary to enable the provision of the proposed Village Green. A minimum of one hectare of land has been identified for the new Village Green and the construction of up to 20 new dwellings. It is also specified that the developer of the housing scheme to be established shall meet the Local Plan requirement for affordable homes, which wherever possible should in the first instance be offered to those in need within the Parish. Other objectives are set out in *Section 3*, such as to ensure that there are proper traffic management measures put in place, and that the remainder of the open space countryside woodland and landscape, will be safeguarded.

66. In *Section 4 - Constraints and Opportunities* –it is stated that the Proposed Plan is a response to local people’s desire to establish the Village Green in Kingswood and to create a new heart for Kingswood Village, and a focal point (paragraph 25). In paragraph 27 it is stated that this will provide a valuable resource for Kingswood Village in creating a new focus for local people. In paragraph 32 it is acknowledged that there is no strategic need to provide new housing in Kingswood as most of the housing identified in the Emerging Local Plan is to be focussed within adjoining the urban area of Maidstone, with further housing allocated in a number of other villages. The proposed allocation of 20 new dwellings includes the provision of eight new affordable homes which represents 40% of the total homes constructed.

67. *Policy VGI* – Kingswood Village Green and Provision of New Housing - provides as follows: -

“Village Green and Enabling Development. Permission will be granted for a Village Green and 20 new dwellings on land enclosed by Gravelly Bottom Road, Duck Pond Land and Chartway Street as identified on the site allocation plan [Figure 1].

The proposal must be based on a masterplan indicating how the whole of the site is to be used. This shall be in accordance with the Diagram (Fig. 2).

The proposal will include:

- (a) A Village Green which will be publicly available, landscaped area of at least 1 hectare. The Village Green must be arranged in accordance with the Diagram (Figure 2) and shall include a children’s play area.
- (b) 12 market houses which shall comprise a range of types and costs/values rather than being limited to only top-end executive dwellings.
- (c) 8 affordable homes suitable to meet the needs of the local community of Broomfield and Kingswood.
- (d) Structural landscaping proposals as shown in the Diagram.
- (e) Access and parking arrangements.

The proposal may also include a mixed-use community building (use Class D, Use Class Order 1987 as amended) as part of the mix of uses, in the area identified within the Diagram.

The proposal must demonstrate that the development will deliver a good quality public space and arrangements to ensure how it will be maintained in the long term.

Design

The detailed proposals shall be in accordance with:

- (a) Building for Life 12;
- (b) Secured by Design;
- (c) Kent Design Guide guidance for villages.

and shall be subject to Design Review by a Design Review Panel set up by the Parish Council.

Transport

The proposal must provide the following on site:

- (a) Traffic calming measures to help minimise vehicle speeds for traffic entering from Gravelly Bottom Road and within the site;
- (b) Provide a single point of vehicular access to Gravelly Bottom Road, as shown in Figure 2;
- (c) A footpath shall link to Gravelly Bottom Road within the site to the South of the landscape strip;
- (d) The carriageway width should be 4.8 metres with 1.8 metre wide footpaths.”

The position of the Borough Council

68. On 1st December 2015 the Strategic Planning, Sustainability and Transportation Committee of the Borough Council made a final decision on the recommendations contained in the Officer’s Report presented to the Committee. The decision made was that the Borough Council’s consultation responses to the Proposed Plan, as presented in the Report to the Committee, be agreed and used as the basis for Council’s formal representations in accordance with Regulation 16 of the 2012 Regulations. The expressed position of the Borough Council was that the Proposed Plan:-

- (1) Is in general conformity with the strategic policies of the adopted Maidstone Borough-wide Local Plan, except with regard to the allocation of a significant development proposal of 20 units outside the village boundary of Kingswood;
- (2) Has been assessed, at this stage, not to require Strategic Environmental Assessment or Habitats Regulations Assessment;
- (3) Is in general conformity with the adopted policies of the Local Plan 2000, apart from a number of specific policies of the Local Plan as thereafter set out.

69. It was therefore necessary for the Borough Council to make an assessment of these specific policies that to which reference has been made and whether the Proposed Plan met the Basic Conditions, and other legislative requirements to which reference has been made above.

Planning Policies

Local Plan Policy ENV 28²⁷ – Development in the Countryside: NP Policy VGI Village Green and Enabling Development

70. The Local Plan contains a number of saved provisions. One of these is Policy ENV 28²⁸. This forms part of the section entitled “Countryside” in the Environment Chapter. Paragraph 3.87 refers to the Urban and Village Development Boundaries shown on the Proposals Map which identify the built-up extent of urban Maidstone and the larger villages in the Borough. The “Countryside” is defined as all those parts of the Plan area which are not within the development boundaries. Reference in paragraph 3.88 is made to PPG 7 which is the Government advice dealing with “Countryside-Environmental Quality and Economic Development”. The thrust of the paragraphs is to reserve and conserve the character of the Countryside, as defined.
71. Policy ENV 28 provides as follows:- “In the Countryside planning permission will not be given for development which harms the character and appearance of the area or the amenities of surrounding occupiers ...” and development will be confined to the five points set out. Paragraph (3) limits development to “Open Air Recreation and Ancillary Buildings providing operational uses only”, and paragraph (5) refers to “such other exceptions as indicated by policies elsewhere in this Plan”. It is also specified that proposals should include measures for Habitat restoration and creation to ensure that there is no net loss of wildlife resources.
72. The Borough Council makes reference to the fact that the Proposed Plan allocates a site which includes 20 dwellings in the Countryside. This means that the village envelope would necessarily extend beyond the settlement boundary defined on the Local Plan Proposals Map in order to accommodate those new proposals for the village. It is stated that this”is not in general conformity with this adopted

²⁷ To be superseded by Policy SP17 of the Emerging Local Plan.

²⁸ Ibid.

Local Plan Policy as a proposal for Market Housing Development encroaches into the Countryside.”

73. The Borough Council further states that there is no evidence base which justifies this development in the location proposed. There is passing reference in the Proposed Plan to a mixed-use community building, but such community benefits may not be achieved.

Local Plan Policy H1²⁹ – Housing Land Allocations

74. Saved Policy H1 under the heading “Housing Land Allocations” refers to 24 sites as defined on the Proposals Map as being allocated for housing development. None of those sites is located in the Proposed Plan Area. However, the Proposed Plan allocates a site for 20 dwellings, and therefore is not in conformity with this adopted Local Plan Policy as it is outside those allocated sites. Further the Borough Council refers to the proposal to construct 20 dwellings as being “substantial” i.e. more than 10 units.

Local Plan Policy H27³⁰ – Rural Settlements (minor developments)

75. Further, under the heading “Rural Settlements” of the Local Plan paragraph 4.175 makes reference to the 1996 Kent Structure Plan which continues previous policies of concentrating new development in or adjoining towns and restricting the outward spread of most villages. Three types of rural settlement are identified in the Structure Plan, the first of these as contained in (i) “Settlements where new residential development will be restricted to minor development (Structure Plan Policy RS2).” Policy H27 provides that within the boundaries of certain specified villages as listed and found on the Proposals Map, new residential development will be restricted to “minor development”. One such village is the village of

²⁹ To be superseded by Policy H1 of the Emerging Local Plan.

³⁰ To be superseded by Policies SS1; SP5; and SP11 of the Emerging Local Plan.

Kingswood. The definition of “minor development” is to be found in paragraph 4.176. This provides as follows:-

“Minor development will include infilling which the completion of an otherwise substantial built-up frontage by the filling of a narrow gap capable usually of taking one or two dwellings only. Otherwise the Borough Council’s interpretation of what constitutes minor development will be considered in each case in the context of the settlement concerned advised in the Kent Structure Plan.”

Local Plan Policy T21³¹ – Accessibility of new development

Local Plan Policy T23³² – Need for Highway – Public Transport

76. In so far as Policy T21 is concerned there is a single point of access to the proposed site and a footpath linking Gravelly Bottom Road, within the site to the landscape strip to the south, as stated in NP Policy VG1 – Transport (a) – (c). There is no available evidence that the current proposals are acceptable to the Local Highway Authority. However Highways England did confirm in a letter from Mr Kevin Bown that they had no comments to make on the Proposed Plan.

Adopted open space DPD Policy OS1³³

77. The allocated site for housing development contained in NP Policy VG1 VG provides for a Village Green of 1 hectare of public open space, to include a children’s play area. The proposal is that the Village Green will serve 20 dwellings, and as such sufficiently meets the adopted standard of open space for a development of this size. Paragraph 1.14 of the Open Space Development Plan document makes reference to PPG 17 which requires Local Authority’s to assess the level of provision of open space within its boundary. Policy OS1 provides as follows: -

³¹ To be superseded by Policy DM24 of the Emerging Local Plan.

³² To be superseded by Policies DM24, and ID1 of the Emerging Local Plan.

³³ To be superseded by Policies DM22, and OS1 of the Emerging Local Plan.

“On all residential developments of 10 dwellings or more there will be a requirement for open space provision in accordance with standards specified in the Appendix to this Policy.”

Thus the proposal clearly meets the adopted standards of open space for a development of this size and clearly falls within one or more of the 8 categories of open space referred to in the Green Spaces Strategy in paragraphs 1.14 and 1.15 of OS1. The Borough Council suggests that the insertion of the word “equip” before the words “children’s play area” will ensure conformity with the policy.

Adopted Affordable Housing DPD Policy AH1³⁴

78. NP Policy VG1 currently allocates a proposed site of 20 residential units, 8 of which are for affordable homes to meet the needs of the local community of Broomfield and Kingswood. This policy provides that on housing sites or mixed-use development sites of 15 units or more, or 0.5 hectare or greater the Council will seek to negotiate that a minimum of 40% of the total number of dwellings to be provided will be affordable housing to meet the identified housing need, unless the Council is satisfied of the exceptional circumstances that can demonstrate that any lesser proportion can be provided. Thus, it is apparent that the proposal is in conformity with DPD Policy AH1, although as the Borough Council states the actual wording needs to be checked with the Housing Service of the Borough Council to assess the appropriateness of the proposal.

79. The Borough Council then refers to other saved Local Plan Policies where the Proposed Plan is either consistent with, or reliant upon existing policy. These are:-

- (1) Policies ENV 22, 23, 24, 27, 32, 34, 41 and 44.
- (2) Policies ED1, and 2
- (3) Policies T17, and 18
- (4) Policy R11
- (5) Policies CF1, 2, 3 and 8

³⁴ To be superseded by Policy DM13 of the Emerging Local Plan.

CHAPTER 5

Conclusions

80. Having regard to the Basic Conditions, and in particular to Condition (e) , the terms of the NPPF, the saved policies of the Local Plan, and the proposed policies of the Emerging Local Plan (to which reference has been made above), the Proposed Plan does not comply with the legislative requirements in certain important respects, for the following reasons:-

- (1) Although the Proposed Plan does conform with a number of Policies (as referred to above), the position of the Borough Council is that the Neighbourhood Plan is not in general conformity with the adopted Local Plan Policy ENV28 as it allocates a site for the construction of 20 residential units outside the village boundary of Kingswood. In other words the area of the proposed development extends beyond the settlement boundary, as defined in the Proposals Map, and encroaches into the Countryside.
- (2) Further, the proposed housing development is more than ten units, means that it is classified as “substantial” for the purposes of Policy H1, and is more than “minor development” for the purposes of Policy H27. It is therefore not in conformity with the spatial objectives set down by the policies of the Local Plan, and the Emerging Local Plan.
- (3) Further, the Parish Council has provided no evidence base justifying the scale of development in this location on the basis of community engagement, or sustainable development.
- (4) The Borough Council makes the point that although reference is made in Policy VG1 in the Proposed Plan to the possibility that a mixed-use building might be provided, this is in effect only tentative, and not included in the actual proposal. Even if it were possible to justify the proposal by the inclusion of a mixed-used community building under either (3) or (4) of Policy ENV 28, there is a fundamental difficulty

with that approach. There is already a village hall in existence, as referred to in paragraph 22 of the Proposed Plan.

(5) The fact that the proposed housing development extends beyond the settlement boundary and encroaches into the Countryside, is “substantial”, and cannot be classified as “minor development” is, in my judgment, fatal to the Proposed Plan. There would appear to be no basis for any amendment of the proposal to avoid that fatality as the proposal in its current form is incapable of modification.

81. In essence unless and until the Borough Council considers the extension of the allocation of further development for housing in Broomfield and Kingswood so as to take account of a proposal such as that put forward by the Parish Council, then the Proposed Plan fails to meet the Basic Conditions, and in particular condition (e).

Edward F Cousins

1st March 2016

Strategic Planning, Sustainability & Transportation Committee	14 June 2016
Is the final decision on the recommendations in this report to be made at this meeting?	N/A

Examinations of Staplehurst and Headcorn Neighbourhood Plans

Final Decision-Maker	Strategic Planning, Sustainability & Transportation Committee
Lead Head of Service	Rob Jarman, Head of Planning and Development
Lead Officer and Report Author	Cheryl Parks, Project Manager, Local Plan
Classification	Public
Wards affected	Headcorn, Staplehurst

This report makes no recommendations to this Committee and is for information only.

This report relates to the following corporate priorities:

- Keeping Maidstone Borough an attractive place for all -
- Securing a successful economy for Maidstone Borough -

Timetable	
Meeting	Date
Strategic Planning, Sustainability & Transportation Committee	14 June 2016

Examinations of Staplehurst and Headcorn Neighbourhood Plans

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 This report has been written to update the Committee in regard to an issue that has arisen in relation to the examinations of the Staplehurst and Headcorn Neighbourhood Plans and the actions of officers in seeking to address this issue.
-

2. INTRODUCTION AND BACKGROUND

- 2.1 Both Staplehurst and Headcorn Neighbourhood Plans have been significantly advanced in recent months and officers have been working closely with the Parish Councils to facilitate progress.
- 2.2 Staplehurst consulted formally on its plan between 23 October and 4 December 2015, and the Borough Council's response to the consultation was agreed by this Committee at its meeting of 10 November 2015.
- 2.3 Headcorn held its consultation slightly later, between 15 January and 26 February 2016 with the Borough Council's response being agreed by this Committee at its meeting of 9 February 2016.
- 2.4 The Borough Council has a procurement agreement to obtain candidate examiners for Neighbourhood Plans through a framework called NPIERS (Neighbourhood Planning Independent Examiner Referral Service) run by the Royal Institute of Chartered Surveyors (RICS). The NPIERS resource has been developed as a key source of independent examiners by the following organisations with support from the Department of Communities and Local Government:
- Royal Institution of Chartered Surveyors (RICS)
 - Planning Officers Society (POS)
 - Royal Town Planning Institute (RTPI)
 - Action with Communities in Rural England (ACRE)
 - Locality.
- 2.5 Using the NPIERS service gives a number of assurances regarding the skills and accreditation of the person referred, as well as certainty around availability and costs. All NPIERS registered examiners should be free from conflict of interest, fully trained and qualified to undertake the examination, a member of a relevant professional body, and in possession of suitable professional indemnity insurance.
- 2.6 NPIERS hold strict criteria for inclusion in the panel and strong governance to ensure the panel remains fit for purpose. Performance is monitored by the governance board for quality assurance purposes. All panel members also work to a fixed fee tariff allowing for Local Planning Authorities to understand the cost implications from the outset.

- 2.7 During the Regulation 16 consultations on both Neighbourhood Plans, candidate examiners were sought, and passed to the relevant Parish Councils for consideration. It remains officers' view that the appointment should be carried out in a collaborative way and that the choice of the Parish should be agreed unless there is a strong justification not to do so.
- 2.8 Both Staplehurst and Headcorn Parish Councils chose to request the services of Ms Clare Wright of Community Spirit Partnership to examine their respective Neighbourhood Plans, and these decisions were supported by the Borough Council given Ms Wright's local knowledge and NPIERS accreditation.
- 2.9 Relevant papers were supplied to Ms Wright to commence the examinations within one week of the close of the consultations (December 2015 for Staplehurst; March 2016 for Headcorn) and assurances sought as to the likely timetable for concluding each examination. The Borough Council was informed in writing that the Staplehurst Plan examination could be concluded within 10 – 15 days of receipt of the required information, and separately that the Headcorn Plan examination could be completed within the month of March.
- 2.10 Whilst undertaking the initial examination for Staplehurst Neighbourhood Plan, the appointed examiner made several requests for additional information to support the Plan, which led to delays with the examination, and clearly frustrated the Parish Council. This also subsequently led to the examination of the Headcorn Neighbourhood Plan running in parallel. On 4 May 2016, after much delay, the examiner issued two written interim reports: for Staplehurst, challenging the methodology applied to the screening carried out in regard to Strategic Environmental Assessment, and the site selection process undertaken; for Headcorn, posing a number of questions regarding the drafting of the Plan and calling for a hearing to further explore the issues raised. The questions sought clarity on how the Headcorn Neighbourhood Plan, as drafted, supports the development needs for the area and the objectively assessed need in the emerging Local Plan; whether the Headcorn Neighbourhood Plan has been prepared in a positive manner; whether it is appropriate for a Neighbourhood Plan to challenge the strategic policies of the emerging Local Plan; what the arguments are for not following the advice of statutory consultee Southern Water; whether a requirement for 20% affordable housing is in conformity with adopted policy; and what guidance exists to inform decisions on 'remoteness' and appropriateness of development.
- 2.11 Both Parish Councils were contacted in regard to the receipt of the interim reports and copies of these were placed on the Borough Council website on the Neighbourhood Plan pages. It was the view of officers that the issues raised in regard to Staplehurst could easily have been overcome by way of additional confirmation and clarification rather than through the issuing of a written report – an assertion subsequently verbally agreed by Ms Wright.
- 2.12 On 20 May 2016, Ms Wright contacted the Borough Council again, but this time to notify officers that she had lost her accreditation in the latest round of performance monitoring by the NPIERS governance board and so

therefore could no longer continue the examinations under the NPIERS framework. A number of potential solutions were proposed by Ms Wright for consideration, including her re-appointment as an examiner independently of the NPIERS framework, but this would not meet the procurement requirements of the Borough Council and so was rejected.

- 2.13 Following receipt of this news, officers contacted both Parish Councils to advise what had happened, and to set out what the Borough Council would be doing to assist in trying to rectify the situation, including the seeking of alternate examiners for consideration.
- 2.14 NPIERS were contacted and asked to urgently provide a revised list of candidate examiners for each Neighbourhood Plan, and given the protracted process to date were requested to expedite the request to ensure a swift resolution for all concerned.
- 2.15 An alternate examiner has been proposed for both Plans by NPIERS, Mr Christopher Lockhart-Mummery QC, but the Borough Council has reservations that, in advising Kent County Council on Local Plan related transport matters, Mr Lockhart-Mummery QC may have a perceived conflict of interest. This position has been shared with both Parish Councils and with NPIERS who are actively seeking further candidate examiners for consideration.
- 2.16 The Borough Council has also discussed its reservations with Mr Lockhart-Mummery QC who, being in the best position to determine whether or not he believes he may have a conflict of interest (perceived or otherwise), has indicated that he did not think that this matter would be relevant to either Neighbourhood Plan under consideration. However, he conceded that if he was wrong, or if there could be any perception of conflict, he should certainly withdraw from the appointment.
- 2.17 A legal view has been sought in relation to this potential/perceived conflict as well as in relation to the status and weight attributable to the interim reports received from Ms Wright. The view of Mid Kent Legal Services in relation to the appointment of Mr Lockhart-Mummery QC is that caution should be applied in relation to the potential or perceived conflict of interest and how it might affect the decision-making processes during the examination of the Neighbourhood Plans and that consideration should be given to not appointing Mr Lockhart-Mummery QC to the role in this instance.
- 2.18 With regard to the weight and status of the previous examiner's written interim reports, it is considered that these interim reports can be relied upon, subject to the reasons for loss of accreditation (yet to be determined/provided), but that the new examiner will probably want to review the whole situation so it cannot be guaranteed at this stage what weight the new examiner will place upon those interim reports; it is not for the Borough Council to dictate or indicate the weight to be attached.

3. NEXT STEPS

- 3.1 Officers remain in contact with both Parish Councils on this matter and are seeking to appoint a suitable examiner for both Plans quickly, and with the aim of ensuring no further delays. To this end, an alternate provider (Intelligent Plans, a panel of semi-retired former Planning Inspectors) has also been contacted as a fall-back position should NPIERS be unable to provide suitable candidates.
- 3.2 A further update can be provided to the Committee at its July meeting if required.

4. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
Impact on Corporate Priorities	A Neighbourhood Development Plan, once made, will be part of the Development Plan for the borough, directly impacting on the Corporate Priorities through the determination of planning applications in the plan area.	Rob Jarman, Head of Planning and Development
Risk Management	There is reputational risk to the Borough Council relating to this report. Whilst officers have endeavoured to work proactively with both Parish Councils there is still a view that some fault lies with the Borough Council, which is not the case. The view externally, in both Parishes but more strongly evident in Headcorn is that the Borough Council is actively delaying Neighbourhood Plans in order to give greater priority to the Local Plan and to push through higher housing numbers for rural settlements. This is refuted in the strongest terms.	Rob Jarman, Head of Planning and Development
Financial	There may be additional related costs. As yet, no request for payment has been made by Ms Wright, and any such invoice must be given very careful consideration before payment,	Paul Riley, Section 151 Officer & Finance Team

	including potentially rejecting the request. A new examination will incur new costs.	
Staffing	There are no staffing implications relating to this report and its recommendations.	Rob Jarman, Head of Planning and Development
Legal	Statute sets out the procedures to be followed with regard to Neighbourhood Planning. The Borough Council is obliged to follow statutory requirements. The information provided in this report underpin and support those procedures.	Kate Jardine, Team Leader (Planning), Mid Kent Legal Services
Equality Impact Needs Assessment	The needs of different groups are considered throughout the development of the plans.	Anna Collier, Policy & Information Manager
Environmental/Sustainable Development	Plans must have regard to sustainability and the natural environment including heritage assets as part of their policies. An assessment for the need for Strategic Environmental Assessment is carried out at an early stage and repeated at key stages of the plans development.	Rob Jarman, Head of Planning and Development
Community Safety	N/A	Rob Jarman, Head of Planning and Development
Human Rights Act	N/A	Rob Jarman, Head of Planning and Development
Procurement	There are no particular procurement requirements or considerations that are not already in place at this stage.	Rob Jarman, Head of Planning and Development & Paul Riley, Section 151 Officer
Asset Management	N/A	Rob Jarman, Head of Planning and Development

5. REPORT APPENDICES

- None

6. BACKGROUND PAPERS

- None