

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