

AGENDA

STRATEGIC PLANNING, SUSTAINABILITY AND TRANSPORTATION COMMITTEE MEETING ADJOURNED FROM 18 AUGUST 2015



Date: Wednesday 19 August 2015
Time: 5.00 pm
Venue: Town Hall, High Street,
Maidstone

Membership:

Councillors Burton (Chairman), English,
Mrs Gooch, Mrs Grigg, Harwood,
Paine, Springett, de Wiggondene and
Mrs Wilson

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1. Apologies for Absence
2. Notification of Substitute Members

Continued Over/:

Issued on 19 August 2015

The reports included in Part I of this agenda can be made available in **alternative formats**. For further information about this service, or to arrange for special facilities to be provided at the meeting, **please contact TESSA MALLET on 01622 602621**. To find out more about the work of the Committee, please visit www.maidstone.gov.uk

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

3.	Urgent Items	
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	
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Strategic Planning, Sustainability and Transport Committee

18 August 2015

Is the final decision on the recommendations in this report to be made at this meeting?	Yes
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Future locations for housing growth

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

This report makes the following recommendations to the final decision-maker:

1. That the three broad locations are approved for incorporation into the Regulation 19¹ version of the Maidstone Borough Local Plan:
Maidstone Town Centre: some 700 dwellings
Invicta Park Barracks: some 1300 dwellings
Lenham: some 1500 dwellings.
2. That the amendments to policies H3, H3(2) and H3(3) set out in Section 4 of the report are approved for incorporation into the Regulation 19 version of the Maidstone Borough Local Plan.

This report relates to the following corporate priorities:

- Keeping Maidstone Borough an attractive place for all

Timetable

Meeting	Date
Strategic Planning, Sustainability and Transportation Committee	18 August 2015

¹ The Town and Country Planning (Local Planning) (England) Regulations 2012

Future locations for housing growth

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 Policy H3 relates to Future Locations for Housing Growth, also known as 'broad locations.' Three such locations are identified in the policy as follows:

Maidstone Town Centre: Some 700 dwellings

Invicta Park Barracks: Some 1300 dwellings

Lenham: Some 1500 dwellings

- 1.2 It is intended that any development in these locations would occur at the latter end of the plan period (2026-2031).
- 1.3 This report assesses the responses made following the Regulation 18 Consultation on Policy H3 of the draft Maidstone Borough Local Plan 2014 and considers whether any changes to the policy should be made as a result.
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2. INTRODUCTION AND BACKGROUND

- 2.1 The Council is required to demonstrate that it has a supply of deliverable sites for a five year period plus a buffer of 5% and that it can identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan period. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.
- 2.2 As part of this process the three broad locations set out in policy H3 (attached at Appendix 1) have been identified for the latter part of the plan period, from 2026-2031. They would be subject to a formal review at the first review of the Local Plan once adopted. No specific sites are currently indicated although for Lenham in particular, as part of the 2014 SHLAA 'call for sites' exercise that was undertaken, sites have come forward in the indicated area of the broad location to the east and west of the existing village to give a good indication of potential availability.
- 2.3 Appendix F of the Regulation 18 Consultation Draft of the Local Plan (attached at Appendix 2) sets out additional development criteria that would need to be addressed if the sites at Invicta Park Barracks and Lenham came forward before the local plan is reviewed.
- 2.4 Policy H3 was included as part of the Maidstone Borough Local Plan Regulation 18 Consultation draft when that was published for consultation between March and May 2014.

- 2.5 A summary of the issues raised and a schedule of responses by Officers to the issues raised following the Regulation 18 Consultation are attached at Appendix 3.
- 2.6 It is considered that it is entirely appropriate and consistent with the guidance in the NPPF for broad locations for future growth to be proposed for the latter part of the plan period. As stated above, these will be subject to review when the local plan is reviewed following its adoption.
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3. AVAILABLE OPTIONS

- 3.1 Councillors could choose to recommend that the proposed broad locations are deleted from the Local Plan. This would need to be subject to further Regulation 18 Consultation. The main consequence of this would be a need to find alternative housing sites to address any resultant shortfall of potential supply against the Objectively Assessed Need of 18,560 dwellings.
- 3.2 Alternatively, numbers in the broad locations could be increased. This too has some uncertainties attached to it. In the case of Invicta Park Barracks, the primary uncertainty would be whether such an increase would harm the parkland within the site and thus the setting of the Grade II* listed Park House. It is considered that this would be likely to be the result. In the case of Lenham, a number of sites did come forward in the indicated areas of the broad location east and west of the existing built-up area of the village that indicated the proposed level of future growth could be achievable. Beyond this there would be further uncertainty. In the Town Centre, the full impact of changes to 'permitted development rights' has yet to be felt, but at the meeting of the Committee on 23 July 2015 it was agreed in principle that, subject to further discussion at the 18 August meeting when broad locations are considered in full, consideration is given to increasing the yield of the Town Centre broad location from an estimated 600 dwellings to 700 dwellings. Following a review of further development potential within the Town Centre, an additional 100 dwellings, allocated for the latter years of the plan period is considered achievable.
- 3.3 The third option would be to retain two of the three broad locations as they are with the indicated housing numbers maintained at their current levels (Invicta Park Barracks and Lenham), and to increase the yield from the Town Centre from 600 to 700 dwellings. Changes to the criteria to reflect concerns expressed in the representations received following consultation should be made as appropriate.
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4. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS

- 4.1 The Committee is recommended to approve the following changes to policy H3 of the draft Maidstone Borough Local Plan in respect of future locations for housing growth and also the criteria included at Appendix F of the draft local plan for policies H3(2) and H3(3). Additions to the policy are in **bold text** and deletions are in ~~strike through text~~. Paragraphs 4.2 to 4.8 are the supporting text

to the policy whereas the policy itself is set out in the table at paragraph 4.9. The criteria for Appendix F that deal with Invicta Park Barracks and Lenham are set out in the tables at paragraph 4.10.

Policy H3 - Future locations for housing growth

- 4.2 The council has identified Maidstone Town Centre, Invicta Park Barracks on Royal Engineers Road and Lenham as future broad locations for housing growth, where the expectation is that development will not take place at these locations until the latter end of the plan period (2026-2031).

Maidstone Town Centre

- 4.3 It is acknowledged that there is an oversupply of poorer quality office stock in the town centre which is no longer fit for purpose. This has the effect of suppressing the town centre office market and thereby inhibiting new development which could better meet modern business needs. A route to tackle this is to rationalise the supply of the poorest stock through conversion or redevelopment to alternative uses. Over the time frame of the plan it is anticipated that the value of the lowest quality office stock, in terms of rents, will fall further making redevelopment for alternative uses increasingly viable. With a corresponding uplift in the market for town centre apartments, this trend could see the delivery of significant new housing in and around the town centre. **The impact of the temporary permitted development entitlements for changes of use from office accommodation to residential use has yet to be fully assessed, although a number of prior notifications have been submitted.** In view of the market shifts needed, delivery is likely to be realised towards the end of the plan period. The town centre broad location has the potential to deliver in the order of **700** additional homes.

Invicta Park Barracks, Maidstone

- 4.4 Invicta Park Barracks covers a substantial area (41 ha) to the north of the town centre. It comprises a range of military buildings, including army accommodation, set within expansive parkland. The site is currently home to the 36 Engineer Regiment. The Ministry of Defence (MoD) has categorised the site as a 'retained' site in its most recent estates review (2013), **rather than a 'core' site which has a more secure future; although there are no immediate plans to vacate this site.**
- 4.5 The MoD keeps its property portfolio under regular review. **The MoD has confirmed to the council** that, in the longer term, there could be some prospect that the site may be declared surplus and so become available for alternative uses.
- 4.6 In recognition of this potential, and the **clear** need to plan positively for it **in the event that the site does become surplus to MoD requirements (again it is advised that there are no immediate plans to vacate the site)**, the draft local plan identifies Invicta Park Barracks as a broad location for future housing growth towards the end of the local plan period (post 2026). The site has the potential to deliver in the order of 1,300 new homes.

Lenham

4.7 Lenham is identified as a rural service centre in the local plan, primarily because of the range of services and facilities in the village, transport infrastructure, local employment opportunities and the fact that the village serves its local population and surrounding areas.

4.8 Approximately 40 ha of land adjacent to the east and west of Lenham's built form is considered suitable to accommodate additional housing in the region of 1500 dwellings in total, if required towards the latter end of the plan period (post 2026). The topography of this area is low lying and does not have the same landscape or infrastructure constraints as some other areas of the borough. However, it is accepted that a number of infrastructure improvements and mitigation measures (e.g. transport, highways, education, health, sporting facilities) would be required to ensure that any future development is integrated into the existing fabric of the settlement and to ensure that Lenham remains a sustainable settlement.

4.9

<p>Policy H 3 Future locations for housing growth The following locations are identified as future locations for housing growth for the later phases of the plan period (2026 onwards):</p> <ol style="list-style-type: none"> 1. Town centre: some 700 dwellings; 2. Invicta Park Barracks, Maidstone: some 1300 dwellings; and 3. Lenham: some 1500 dwellings. <p>Appendix F sets out the broad criteria which will govern development in locations (2) and (3). Detailed site allocations for sites (2) and (3) will be made as part of a local plan review</p>
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4.10 Appendix F. Future locations for housing growth

Site name, address	H3(2) Maidstone Barracks Invicta Park		
Ward	North	Parish	N/A
Maidstone Barracks (future location for housing growth) development criteria The Maidstone Barracks (Invicta Park) is identified as a future location for housing growth of up to 1300 dwellings towards the end of the local plan period (post 2026). Should the site come forward within the growth location as defined in the policies map before the local plan is reviewed in 2021, the following criteria must be met in addition to other policies of this local plan: <ol style="list-style-type: none"> 1. Integration of new development within the existing landscape structure of the site Preparation and submission of a development brief and a masterplan prepared in conjunction with and for approval by the council to guide development; 2. 4 Integration of new development within the existing landscape structure of the site (supported by ecological, arboricultural and landscape and 			

<p>visual impact assessments together with the identification of detailed mitigation measures where appropriate);</p> <p>3. 2- Ensuring requisite community facilities, which may include neighbourhood shopping, and health and education facilities, are delivered in conjunction with housing;</p> <p>4. 3- Off-site highway improvements as necessary to mitigate the impact of development;</p> <p>5. 4- Securing a network of public footpaths and cycling routes through the site;</p> <p>6. 5- Preservation of features of ecological importance including the retention and enhancement of wildlife corridors and ensuring that connection with ecological features and corridors outside the site is maintained/enhanced;</p> <p>7. 6- Enhanced walking, cycling and public transport connections to the town centre and local area;</p> <p>8. 7- Preservation of Park House (Grade II*) and its setting in particular the parkland to the north and east of Park House to include removal of existing built development at 1-8 (consecutive) The Crescent to enhance/restore the parkland setting.</p> <p>9. Development proposals must demonstrate that the necessary sewerage infrastructure is either available, or can be delivered in parallel with the development.</p>	
Gross Area (ha)	41

Site name, address	H3 (3) Lenham		
Ward	Harrietsham and Lenham	Parish	Lenham
<p>The rural service centre of Lenham is identified as a future location for housing growth of up to 1,500 dwellings towards the end of the local plan period (post 2026). Should sites come forward within the growth location, as defined in the policies map, before the local plan is reviewed in 2021, the following criteria must be met in addition to other policies of this local plan:</p> <p>1. Submission of necessary ecological and landscape surveys with detailed mitigation schemes where appropriate; Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council to guide development;</p> <p>2. 4- Submission of necessary ecological, arboricultural and landscape and visual impact surveys assessments with detailed mitigation schemes where appropriate;</p> <p>3. 2- Individual transport assessments for each development, to be submitted to and approved by the Borough Council in conjunction with Kent County Council, as the highway authority, demonstrating how proposed mitigation measures address the cumulative impacts of all the sites taken together;</p> <p>4. 3- Provision of, or contributions towards infrastructure improvements that benefit public transport users, pedestrians and cyclists in and around the village;</p> <p>5. 4- Provision of, or contributions towards community infrastructure (e.g. schools, medical facilities, youth facilities), where proven necessary;</p>			

6.	5- Provision of publicly accessible open space, including natural and semi-natural open space, as proven necessary, and/or contributions, and;
7.	6- Appropriate surface water and robust flood mitigation measures will be implemented where deemed necessary, subject to a flood risk assessment, incorporating sustainable urban drainage systems.
8.	A feasible solution shall be identified to provide wastewater treatment capacity so that water quality objectives set by the Environment Agency are not compromised, and the necessary wastewater treatment capacity can be delivered in parallel with the development.
9.	Development proposals must demonstrate that the necessary sewerage infrastructure is either available, or can be delivered in parallel with the development.
Gross area (ha)	
40	

5. CONSULTATION RESULTS AND PREVIOUS COMMITTEE FEEDBACK

- 5.1 The draft Maidstone Borough Local Plan has been subject to public consultation in accordance with Regulation 18 (of the Town and Country Planning (Local Planning) (England) Regulations 2012) between March and May 2014. The key issues raised by respondents to the plan's future locations for Development (H3), together with officer responses and recommendations are set out in Appendix Three of the report and have helped to refine the draft policy.

6. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION

- 6.1 The amended policy H3 and associated criteria (at Appendix F of the Regulation 18 draft) will be included in the Publication version of the Local Plan (Regulation 19).

7. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
Impact on Corporate Priorities	The adoption of the local plan will assist in the delivery of the Council's corporate priorities	Head of Planning & Development
Risk Management	A sound evidence base, together with an assessment of the key issues raised by respondents to policy H3 during Regulation 18 consultation, has helped to develop the policy and reduce risk to the policy being found unsound at examination. Should the allocations as proposed be rejected, there would be a	Head of Planning & Development

	significant shortfall in housing land against objectively assessed need which would result in a high risk to the local plan being found unsound.	
Financial	The development of the Local Plan has been fully funded as part of the Council's revenue budget. There are no direct financial implications arising from this report. Ensuring the Local plan is based on sound evidence will minimise the likelihood of avoidable costs being occurred.	S151 Officer and Chief Accountant
Staffing	N/A	Head of Planning & Development
Legal	The Council is required to take account of any representations made to them in the preparation of its Local Plan (Regulation 18 (3) of the Town and Country Planning (Local Planning) (England) Regulations 2012). The Legal Team continues to provide advice and guidance on local plan matters and to review any legal implications of reports	Team Leader (Planning) Mid Kent Legal Services
Equality Impact Needs Assessment	N/A	Policy & Information Manager
Environmental/Sustainable Development	The Local Plan is fundamentally concerned with delivering sustainable development objectives	Head of Planning & Development
Community Safety	N/A	Head of Planning & Development
Human Rights Act	N/A	Head of Planning & Development
Procurement	N/A	Head of Planning & Development and Section 151 Officer
Asset Management	N/A	Head of Planning & Development

8. REPORT APPENDICES

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

- Appendix 1: Maidstone Borough Local Plan Regulation 18 Consultation Draft 2014: Policy H3.
- Appendix 2: Maidstone Borough Local Plan Regulation 18 Consultation Draft 2014: Appendix F - Policies H3(2) and H3(3)
- Appendix 3 Schedule of responses to the Maidstone Borough Local Plan Regulation 18 Consultation Draft 2014 relating to policy H3 and officers' comments and recommended policy changes.

9. BACKGROUND PAPERS

None

Policy H3 - Future locations for housing growth

6.14 The council has identified Maidstone town centre, Invicta Park Barracks on Royal Engineers Road and Lenham as future broad locations for housing growth, where the expectation is that development will not take place at these locations until the latter end of the plan period (2026-2031).

Maidstone Town Centre

6.15 It is acknowledged that there is an oversupply of poorer quality office stock in the town centre which is no longer fit for purpose. This has the effect of suppressing the town centre office market and thereby inhibiting new development which could better meet modern business needs. A route to tackle this is to rationalise the supply of the poorest stock through conversion or redevelopment to alternative uses. Over the time frame of the plan it is anticipated that the value of the lowest quality office stock, in terms of rents, will fall further making redevelopment for alternative uses increasingly viable. With a corresponding uplift in the market for town centre apartments, this trend could see the delivery of significant new housing in and around the town centre. In view of the market shifts needed, delivery is likely to be realised towards the end of the plan period. The town centre broad location has the potential to deliver in the order of 600 additional homes.

Invicta Park Barracks, Maidstone

6.16 Invicta Park Barracks covers a substantial area (41 ha) to the north of the town centre. It comprises a range of military buildings, including army accommodation, set within expansive parkland. The site is currently home to the 36 Engineer Regiment. The Ministry of Defence (MoD) has categorised the site as a 'retained' site in its most recent estates review (2013); there are no immediate plans to vacate this site.

6.17 The MoD keeps its property portfolio under regular review. It has been confirmed that, in the longer term, there could be some prospect that the site may be declared surplus and so become available for alternative uses.

6.18 In recognition of this potential, and the need to plan positively for it, the draft local plan identifies Invicta Park Barracks as a broad location for future housing growth towards the end of the local plan period (post 2026). The site has the potential to deliver in the order of 1,300 new homes.

Lenham

6.19 Lenham is identified as a rural service centre in the local plan, primarily because of the range of services and facilities in the village, transport infrastructure, local employment opportunities and the fact that the village serves its local population and surrounding areas.

6.20 Approximately 40 ha of land adjacent to the east and west of Lenham's built form is considered suitable to accommodate additional housing in the region of 1500 dwellings in total if required towards the latter end of the plan

period (post 2026). The topography of this area is low lying and does not have the same landscape or infrastructure constraints as some other areas of the borough. However, it is accepted that a number of infrastructure improvements and mitigation measures (e.g. transport, highways, education, health, sporting facilities) would be required to ensure that any future development is integrated into the existing fabric of the settlement and to ensure that Lenham remains a sustainable settlement.

Policy H 3

Future locations for housing growth

The following locations are identified as future locations for housing growth for the later phases of the plan period (2026 onwards):

1. Town centre: some 600 dwellings;
2. Invicta Park Barracks, Maidstone: some 1300 dwellings; and
3. Lenham: some 1500 dwellings.

Appendix F sets out the broad criteria which will govern development in locations (2) and (3). Detailed site allocations for sites (2) and (3) will be made as part of a local plan review.

Appendix F - Future locations for housing growth

Site name, address	H3(2) - Maidstone Barracks, Invicta Park		
Ward	North	Parish	N/A
<p>Maidstone Barracks (future location for housing growth) development criteria</p> <p>The Maidstone Barracks is identified as a future location for housing growth of up to 1,300 dwellings towards the end of the local plan period (post 2026). Should the site come forward within the growth location, as defined in the policies map, before the local plan is reviewed in 2021, the following criteria must be met in addition to other policies of this local plan:</p> <ol style="list-style-type: none"> 1. Integration of new development within the existing landscape structure of the site; 2. Ensuring requisite community facilities, which may include neighbourhood shopping and health and education facilities, are delivered in conjunction with housing; 3. Off site highway improvements as necessary to mitigate the impact of development; 4. Securing a network of public footpath and cycling routes through the site; 5. Preservation of features of ecological importance including the retention and enhancement of wildlife corridors; 6. Enhanced walking, cycling and public transport connections to the town centre; and 7. Preservation of Park House (Grade II*) and its setting. 			
Gross area (ha)	41		

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Maidstone Borough Local Plan - Preparation (Regulation 18) - 2014



Appendix F - Future locations for housing growth

Site name, address	H3(3) - Lenham		
Ward	Harrietsham and Lenham	Parish	Lenham
<p>Lenham (future location for housing growth) development criteria</p> <p>The rural service centre of Lenham is identified as a future location for housing growth of up to 1,500 dwellings towards the end of the local plan period (post 2026). Should sites come forward within the growth location, as defined in the policies map, before the local plan is reviewed in 2021, the following criteria must be met in addition to other policies of this local plan:</p> <ol style="list-style-type: none"> 1. Submission of necessary ecological and landscape surveys, with detailed mitigation schemes, where appropriate; 2. Individual transport assessment for each development, to be submitted to and approved by the Borough Council in consultation with Kent County Council, as the highway authority, demonstrating how proposed mitigation measures address the cumulative impacts of all the sites taken together; 3. Provision of, or contributions towards infrastructure improvements that benefits public transport users, pedestrians and cyclists in and around the village; 4. Provision of, or contributions towards community infrastructure (e.g. schools, medical facilities, youth facilities), where proven necessary; 5. Provision of publicly accessible open space as proven necessary, and/or contributions; and 6. Appropriate surface water and robust flood mitigation measures will be implemented where deemed necessary, subject to a flood risk assessment, incorporating sustainable urban drainage systems. 			
Gross area (ha)	40		

111

Maidstone Borough Local Plan - Preparation (Regulation 18) - 2014

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Schedule of responses to the representations to the sites in Policy H3

Policy Number H3	General comments on Policy H3	
Summary of issues	Officer response	Proposed change
1: Too much reliance is placed on the three broad locations for future development. There are a number of uncertainties about the availability and delivery of these sites.	The sites will be subject to review when the Local plan is reviewed in 2021. There is currently no evidence that sites will not be available or unable to be delivered. The National Planning Policy Framework (NPPF) allows for the identification of broad locations for development.	No change
2: Given the shortfall in housing supply against the identified Objectively Assessed Need, these areas should be brought forward in the plan period to address that shortfall.	The Council has identified sufficient land to meet the Objectively Assessed Need. The policy criteria set out in Appendix F have been drafted to take into account a situation where sites do come forward prior to the review of the Local Plan in 2021.	No change
3: The unused and empty offices in town should be converted to dwellings.	New permitted development rights have seen proposals for the conversion of some of the existing office blocks to residential use.	No change
4: Detling Aerodrome should also be considered as a broad location for development.	Detling Aerodrome is located entirely within the Kent Downs AONB, in an unsustainable location and is not considered appropriate for additional development	No change
5: The future locations for housing growth (e.g. Lenham and Maidstone Barracks	The development criteria set out in Appendix F require proposals to take into	No change

Invicta Park) defined by the plan need early consideration of landscape/habitat issues and opportunities	account ecological and habitat issues and opportunities.	
6: Highways Agency (Highways England): A robust transport evidence base has not been agreed that tests the quantum of development now proposed; nor sufficiently assesses the timing or location of any impacts or the form and funding of any necessary mitigation. The Plan is therefore not yet considered to be based on proportionate evidence.	A robust transport evidence base is being amassed and the quantum and location of proposed development tested. The results will be utilised in the preparation of the Regulation 19 consultation draft.	No change
7: If there are such sites available, why are they not detailed? Identifying general locations for future development is inherently an unsatisfactory position.	The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. There is no evidence to suggest otherwise in respect of the three broad locations that the Council has identified.	No change
8.The broad locations do not provide the necessary certainty needed to ensure that housing need during the Plan period is met.	The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. There is no evidence to suggest otherwise	No change

	in respect of the three broad locations that the Council has identified.	
Policy Number H3	Town Centre Broad Location	
Summary of issues	Officer response	Proposed change
1: Southern Water: No fundamental reasons why this development could not come forward but cannot assess proposals in more detail until the precise location of the development is known	Noted	No change
2: The existing underused office blocks should be developed now and incorporated as allocated sites under policy H1.	New permitted development rights have seen proposals for the conversion of some of the existing office blocks to residential use. Where sites have come forward through the 'call for sites' process they have been allocated. Not all redundant or under-used office blocks have been proposed for development. They cannot therefore be considered as available.	No change
3: Given the considerable site remediation and clearance costs, together with fluctuating and competing land use demands, including for commercial, retail and leisure makes it a highly unpredictable task to plan for housing growth in the town centre. It is submitted that any housing delivery within the town	The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.	No change

centre should be treated as a windfall and should not be planned for or accounted for within the emerging Local Plan requirements, until such time as planning permission may be granted.	There is no evidence to suggest otherwise in respect of the Town Centre broad location.	
4: The contribution from this location seems to come entirely from poor quality offices and given the statements made in paragraph 6.15 (<i>of the Draft Plan</i>) it is clear from the work that the Council has undertaken it is known where these poor quality offices are. This being the case we can see no reason why the Plan cannot make specific allocations for these offices to be converted or redeveloped for housing purposes. This will provide more clarity on their future use and the specific contribution that they will make to meeting future housing needs.	New permitted development rights have seen proposals for the conversion of some of the existing office blocks to residential use. Where sites have come forward through the 'call for sites' process they have been allocated. Not all redundant or under-used office blocks have been proposed for development. They cannot therefore be considered as available.	No change
Policy Number H3	Invicta Park Barracks Broad Location	
Summary of issues	Officer response	Proposed change
1: The MOD has not declared the barracks surplus to requirements. They may not, and the site may not therefore ever be available or deliverable.	The MOD have stated that Invicta Park is not a 'core' site and that it falls into the 'retained site' category. The allocation of the site as a broad location has occurred following discussions with the MOD. Allocation does not mean that the site will	No change

	<p>be vacated by the MOD, but it is prudent nevertheless to plan for that eventuality.</p> <p>The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. There is no evidence to suggest otherwise in respect of this identified broad location.</p>	
<p>2: As there is no certainty that the site will be available it should be deleted as it would appear it is only included to enable the housing target to be neared or reached.</p>	<p>The MOD have stated that Invicta Park is not a 'core' site and that it falls into the 'retained site' category. The allocation of the site as a broad location has occurred following discussions with the MOD.</p> <p>Allocation does not mean that the site will be vacated by the MOD, but it is prudent nevertheless to plan for that eventuality.</p> <p>The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. There is no evidence to suggest otherwise</p>	No change

	in respect of this identified broad location	
<p>3: Southern Water comments that there is insufficient capacity in the existing sewerage system to accommodate the development. Significant new or improved sewerage infrastructure would be required to serve it.</p> <p>This is not a fundamental constraint to development, but the necessary infrastructure would need to be delivered in parallel with the development.</p> <p>Southern Water looks to the Local Plan to recognise the requirement for significant sewerage infrastructure in planning policies and ensure that this is taken into account in determining planning applications. To this end they seek additional development criteria;</p> <p><i>'Development proposals must demonstrate that the necessary sewerage infrastructure is either available, or can be delivered in parallel with the development. Southern Water has advised that due to the size of the development significant sewerage infrastructure would be required.'</i></p>	<p>Noted and agreed add additional criterion and amend explanatory text to incorporate Southern Water's other advice that <u>'that due to the size of the development significant sewerage infrastructure would be required.'</u></p>	<p>Add additional criterion 9 to Appendix F</p> <p><u>9 Development proposals must demonstrate that the necessary sewerage infrastructure is either available, or can be delivered in parallel with the development.</u></p>
4: The development of the site along with other proposed sites in the area will lead to unacceptable increase in traffic and	A robust transport evidence base is being amassed and the quantum and location of proposed development tested. The results	No change

congestion on the already heavily congested roads in the area.	will be utilised in the preparation of the Regulation 19 consultation draft. The site criteria in Appendix F require the implementation of necessary off-site highway improvements to provide mitigation.	
5: Adverse impact on air quality and pollution.	<p>The development criteria require enhanced pedestrian, cycling and public transport provision.</p> <p>Amend existing criterion 6 (renumbered as criterion 7) to ensure appropriate connection of pedestrian and cycle routes to the local area as well as the town centre.</p> <p><u>7. Enhanced walking, cycling and public transport connections to the town centre and local area;</u></p>	<p>Amend existing criterion 6 (renumbered as criterion 7) in Appendix F to ensure appropriate connection of pedestrian and cycle routes to the local area as well as the town centre.</p> <p><u>7. Enhanced walking, cycling and public transport connections to the town centre and local area;</u></p>
6: Adverse impact on existing wildlife on the site	<p>The development criteria set out in Appendix F require proposals to take into account ecological and habitat issues and opportunities</p> <p>The existing criteria can be strengthened to address concerns in this area</p> <p>Amend existing criterion 1 (renumbered to criterion 2) to read;</p> <p><u>2. Integration of new development within the existing landscape structure of the site (supported by appropriate</u></p>	<p>Amend existing criterion 1 (renumbered to criterion 2) in Appendix F to read;</p> <p><u>2. Integration of new development within the existing landscape structure of the site (supported by appropriate ecological, arboricultural and landscape and visual impact assessments together with the identification of : detailed mitigation measures where appropriate);</u></p> <p>Amend existing criterion 5 (renumbered</p>

	<p><u>ecological, arboricultural and landscape and visual impact assessments together with the identification of appropriate detailed mitigation measures where appropriate);</u></p> <p>Amend existing criterion 5 (renumbered to criterion 6 to read;</p> <p><u>6. Preservation of features of ecological importance including the retention and enhancement of wildlife corridors and ensuring that connection with ecological features and corridors outside the site is maintained/enhanced;</u></p>	<p>to criterion 6) in Appendix F to read;</p> <p><u>6. Preservation of features of ecological importance including the retention and enhancement of wildlife corridors and ensuring that connection with ecological features and corridors outside the site is maintained/enhanced;</u></p>
7: Adverse impact on existing already inadequate sewerage, transport and community facility infrastructure in the area, which would need to be expanded.	The site criteria in Appendix F require the implementation of necessary off-site highway improvements to provide mitigation as well as the provision of necessary community facilities. An additional criterion is proposed to address Southern water's comments regarding sewerage infrastructure	Add additional criterion 9 to Appendix F <u>9 Development proposals must demonstrate that the necessary sewerage infrastructure is either available, or can be delivered in parallel with the development.</u>
8: Adverse impact on the overall character and visual amenity of the area and the quality of life for existing residents.	The proposed development criteria will ensure that any new development is integrated with its surroundings. The protection of the amenities of nearby residents would be secured through detailed design at planning application	Add new criterion 1 to Appendix F and renumber existing criteria accordingly. <u>1. Preparation and submission of a development brief and a masterplan prepared in conjunction with and for</u>

	<p>stage</p> <p>Development should be guided by a design brief and a masterplan prepared in conjunction with the Council and submitted for approval by the Council. Add new criterion 1 and renumber existing criteria accordingly.</p> <p>1. <u>Preparation and submission of a development brief and a masterplan prepared in conjunction with and for approval by the Council to guide development;</u></p>	<p><u>approval by the Council to guide development;</u></p>
<p>9: The landscape, cultural and biodiversity importance of this historic and sylvan parkland are such that if development takes place it should be only minor development restricted to the currently developed footprint well away from the Grade II* listed building.</p>	<p>The proposed development criteria will ensure that any new development is integrated with its surroundings and that the existing Grade II* Listed Building and its setting are preserved.</p> <p>The criterion regarding the existing parkland and the setting of Park House should be strengthened to make this clear.</p> <p>Amend existing criterion 7 (renumbered to criteria 8 to read;</p> <p><u>7. Preservation of Park House (Grade II*) and its setting in particular the parkland to the north and east of Park</u></p>	<p>Amend existing criterion 7 (renumbered as criterion 8) in Appendix F to read;</p> <p>8. <u>Preservation of Park House (Grade II*) and its setting in particular the parkland to the north and east of Park House to include removal of existing built development at 1-8 (consecutive) The Crescent to enhance/restore the parkland setting.</u></p>

	<u>House to include removal of existing built development at 1-8 (consecutive) The Crescent to enhance/restore the parkland setting.</u>	
10: Working committees should be set up with the express purpose of keeping the military in the town not planning for withdrawal.	Noted. The decision about the future of Invicta Park Barracks does not rest with the Council. It is prudent to plan for the eventuality that the site may be declared surplus to requirements by the MOD.	No change
11: Any site access should be onto the A229 Royal Engineers Road only not onto other roads in the area	Appropriate access would be determined by Transport Assessments undertaken as part of any application and design considerations and any necessary off-site mitigation also secured as part of this process.	No change
12: Any development should be a campus-style mixed development and only on the footprint of existing development on the site	<p>The proposed development criteria will ensure that any new development is of an appropriate mix and scale, integrated with its surroundings and that the existing Grade II* Listed Building and its setting are preserved.</p> <p>It is recommended that a development brief and masterplan are prepared in conjunction with the Council and submitted to and approved by the Council to guide future development.</p> <p>Add new criterion 1 and renumber existing criteria accordingly.</p>	<p>Add new criterion 1 to Appendix F and renumber existing criteria accordingly.</p> <p>1. <u>Preparation and submission of a development brief and a masterplan prepared in conjunction with and for approval by the Council to guide development;</u></p>

	1. <u>Preparation and submission of a development brief and a masterplan prepared in conjunction with and for approval by the Council to guide development;</u>	
13: The supporting text to Policy H3 makes clear in the longer term that Invicta Park Barracks could become surplus to requirements. Planning to deliver housing within the Borough based on the possibility of a large site becoming surplus cannot be considered to be planning positively or proactively as required by the NPPF. The Invicta Park Barracks should not form part of the emerging Local Plan accordingly.	<p>The MOD have stated that Invicta Park is not a 'core' site and that it falls into the 'retained site' category. The allocation of the site as a broad location has occurred following discussions with the MOD.</p> <p>Allocation does not mean that the site will be vacated by the MOD, but it is prudent nevertheless to plan for that eventuality.</p> <p>The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. There is no evidence to suggest otherwise in respect of this identified broad location</p>	No change
14: Whilst there are uncertainties surrounding the future availability of this site, it is clearly the Council's view that there is the prospect that it could make a contribution towards the end of the Plan period. This being the case and to provide	The MOD have stated that Invicta Park is not a 'core' site and that it falls into the 'retained site' category. The allocation of the site as a broad location has occurred following discussions with the MOD.	No change

<p>a firm basis for the future planning of the site to ensure that any such contribution is forthcoming, it should be formally allocated in the Plan.</p>	<p>Allocation does not mean that the site will be vacated by the MOD, but it is prudent nevertheless to plan for that eventuality.</p> <p>The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. There is no evidence to suggest otherwise in respect of this identified broad location</p>	
<p>Policy Number H3</p>	<p>Lenham Broad Location</p>	
<p>Summary of issues</p>	<p>Officer response</p>	<p>Proposed change</p>
<p>1: This is a highly speculative allocation and expansion to the east may not be deliverable</p>	<p>The Council has received indications that land is potentially available through a 'call for sites' process.</p> <p>The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.</p>	<p>No change</p>

	There is no evidence to suggest otherwise in respect of this identified broad location	
2: Such a large expansion will be controversial and will raise many issues and may not be deliverable	<p>The Council has received indications that land is potentially available through a 'call for sites' process</p> <p>The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.</p> <p>There is no evidence to suggest otherwise in respect of this identified broad location</p>	No change
3: Lenham is a thriving and characterful medieval village with a strong community spirit, such a large development would completely alter/destroy its character as a place to live and also as a tourist attraction	<p>The proposed development criteria will ensure that any new development is of an appropriate mix and scale and integrated with its surroundings.</p> <p>It would be appropriate to ensure that new development is guided by a masterplan prepared in conjunction with and submitted to the Council for approval.</p> <p>Insert new criterion 1 and renumber existing criterion accordingly;</p> <p>1. <u>Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council</u></p>	<p>Insert new criterion 1 in Appendix F and renumber existing criterion accordingly;</p> <p>1. <u>Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council to guide development;</u></p>

	<u>to guide development:</u>	
4: Development on such a scale would harm The Square and make existing parking and traffic congestion problems much worse	The proposed development criteria will ensure that any new development is of an appropriate mix and scale and integrated with its surroundings. See the response to issue 3 above	No change
5: Existing community facilities can't cope now. How will they cope with such an expansion in the number of houses?	The site criteria in Appendix F require the provision of necessary community facilities.	No change
6: Lenham is capable of expansion and has a strong service and facilities infrastructure. It has good school provision across all years	Noted	No change
7: The proposed allocation would have an adverse impact on the setting of the adjacent Kent Downs AONB	<p>The proposed development criteria will ensure that any new development is of an appropriate mix and scale and integrated with its surroundings including the setting of the adjacent Kent Downs AONB.</p> <p>Renumbered criterion 2 could be amended to reinforce this and changed to read;</p> <p>2. Submission of necessary ecological, <u>arboricultural</u> and landscape <u>and visual impact surveys assessments</u> with detailed mitigation schemes where appropriate;</p>	<p>Change re-numbered criterion 2 in Appendix F to read;</p> <p>2.Submission of necessary ecological, <u>arboricultural</u> and landscape <u>and visual impact surveys assessments</u> with detailed mitigation schemes where appropriate;</p>

8: Whilst the principle of additional development is supported, it is inappropriate to consider greenfield land around Lenham without first considering other available brownfield sites in and around the village	Noted. The broad location identified does not rule-out consideration of other appropriate sites previously developed land in an around the village. A masterplan as now required by criterion 1 (see issue 3 above) would address this.	Add criterion 1 to Appendix F Insert new criterion 1 and renumber existing criterion accordingly; 1. <u>Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council to guide development;</u>
9: If you want to add that number of dwellings to Lenham a new village/town should be considered. The character of Lenham would be changed for ever.	Such an approach is contrary to the Council's preferred spatial development strategy. Even if such a development could be sited to be acceptable in environmental and visual impact terms would need to be of a sufficient scale to provide the necessary infrastructure and community facilities that would need to be wholly funded by new development. The proposed development criteria will ensure that any new development is of an appropriate mix and scale and integrated with its surroundings and with the proposed addition of criterion 1 be guided by a masterplan.	Add criterion 1 to Appendix F Insert new criterion 1 and renumber existing criterion accordingly; 1. <u>Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council to guide development;</u>
10: Lenham would become a dormitory town with not enough employment to support the new dwellings	Lenham as a Rural Service centre has a range of employment uses.	No change
11: Southern Water: 'Significant sewerage infrastructure would be required to serve	Noted and agreed. Add additional criteria and amend explanatory text to incorporate	Add additional criteria 8 and 9 to Appendix F

<p>this development. This is not a fundamental constraint to development as the necessary infrastructure could be provided in parallel with the development, assisted by good forward planning.</p> <p>SW 'look to Maidstone's Local Plan to ensure that development in Lenham, as set out in policy H3, is coordinated with provision of necessary sewerage infrastructure and wastewater treatment capacity.' To this end they seek additional development criteria</p>	<p>Southern Water's other advice that <u>'that due to the size of the development significant sewerage infrastructure would be required to serve the overall level of development of 1500 homes in Lenham.'</u></p>	<p>8. <u>A feasible solution shall be identified to provide wastewater treatment capacity so that water quality objectives set by the Environment Agency are not compromised, and the necessary wastewater treatment capacity can be delivered in parallel with the development.</u></p> <p>9. <u>Development proposals must demonstrate that the necessary sewerage infrastructure is either available, or can be delivered in parallel with the development.</u></p>
<p>12. The scale of the proposed development is entirely disproportionate to the size of the existing settlement</p>	<p>The proposed development criteria will ensure that any new development is of an appropriate mix and scale and integrated with its surroundings. The requirement for a masterplan to guide development will address this issue.</p>	<p>Add criterion 1 to Appendix F</p> <p>Insert new criterion 1 and renumber existing criterion accordingly;</p> <p>1. <u>Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council to guide development;</u></p>
<p>13. Loss of productive agricultural land</p>	<p>Some loss of agricultural land is inevitable to enable necessary development but this is kept to a minimum by strategic and detailed policies which encourage the use of previously developed land wherever possible.</p>	<p>No change</p>
<p>14. Lenham is a distance from Maidstone and any expansion will thus generate</p>	<p>The proposed development criteria seek to provide inter-alia infrastructure</p>	<p>No change</p>

significant additional car journeys on the A20	improvements to public transport	
15. There should be a new junction on the M20 Motorway adjacent to Lenham to not only accommodate the new development but also remove existing HGVs from Lenham Storage from the A20	The M20 Motorway is a considerable distance to the south of Lenham village. A motorway junction, even if one could be sited to the approval of Highways England and be acceptable in environmental and visual impact terms, would require considerable investment and would need to be wholly funded by new development.	No change
16. The possibility of a new village or village extension is worthy of consideration in the Lenham area due to its existing facilities including a railway station and relative ease of access to the major road network. This should be properly discussed now with appropriate partners rather than permitting piecemeal development which could provide the worst effects of development while accruing little in the way of definite benefits.	Such an approach is contrary to the Council's preferred spatial development strategy. Even if such a development could be sited so as to be acceptable in environmental and visual impact terms, it would need to be of a sufficient scale to ensure the necessary infrastructure and community facilities that would be needed could be wholly funded by new development.	No change
17. Arable prairie east of the village should be the focus of any development and significant semi-natural open space should be a core principle of any plan. Recent housing schemes at Swindon and Cambridge have delivered this aspiration.	Such an approach is contrary to the Council's preferred spatial development strategy. Even if such a development could be sited so as to be acceptable in environmental and visual impact terms, it would need to be of a sufficient scale to ensure the necessary infrastructure and community facilities that would be needed could be wholly funded by new development.	No change

18. If development is to take place it is vitally important that the required additional infrastructure is put in place before the development takes place, particularly in relation to transport and utilities.	The site criteria in Appendix F require the implementation of improvements to physical and community infrastructure. An additional criterion is proposed to address Southern water's comments regarding sewerage infrastructure	<p>Add additional criteria 8 and 9 to Appendix F</p> <p>8 <u>A feasible solution shall be identified to provide wastewater treatment capacity so that water quality objectives set by the Environment Agency are not compromised, and the necessary wastewater treatment capacity can be delivered in parallel with the development.</u></p> <p>9 <u>Development proposals must demonstrate that the necessary sewerage infrastructure is either available, or can be delivered in parallel with the development.</u></p>
19. The proposed level of development at Lenham is disproportionate and should be spread more fairly around the Borough	The Local Plan has a well-defined spatial development strategy that does seek to spread development around the Borough as a whole.	No change
20. Langley PC: The Local Plan should bring forward the early implementation for the sustainable and well-planned expansion of Lenham village. It is considered that Lenham has the capacity to deliver some 2500 to 5000 additional dwellings within the plan period within easy walking distance of the station and the village centre. Such a self-contained proposal would be far preferable to the perpetuation of urban sprawl along the Sutton Road.	Such an approach is contrary to the Council's preferred spatial development strategy. The Local Plan has a well-defined spatial development strategy that does seek to spread development around the Borough as a whole.	No change
21. There are uncertainties as to whether	The site criteria in Appendix F require the	Add additional criteria 8 and 9 to

<p>adequate infrastructure can be provided to allow delivery of land to the east and/or west of Lenham and it is submitted that Lenham should not be included within Policy H3 accordingly.</p>	<p>implementation of improvements to physical and community infrastructure. An additional criterion is proposed to address Southern water's comments regarding sewerage infrastructure</p>	<p>Appendix F</p> <p>8 <u>A feasible solution shall be identified to provide wastewater treatment capacity so that water quality objectives set by the Environment Agency are not compromised, and the necessary wastewater treatment capacity can be delivered in parallel with the development.</u></p> <p>9 <u>Development proposals must demonstrate that the necessary sewerage infrastructure is either available, or can be delivered in parallel with the development</u></p>
<p>22. Should be deleted from the Plan. The prospect of a further 1500 houses to the 245 allocated in the Plan is unjustified and would be contrary to the stated purpose of development at the rural service centres i.e. to maintain and enhance the service centre role of the village and meet the needs of the local community. No evidence has been presented to demonstrate why this scale of development is needed to fulfil these stated intentions</p>	<p>The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. There is no evidence to suggest otherwise in respect of the Lenham broad location.</p> <p>The expansion of Lenham would be undertaken on a planned basis, scheduled to commence post 2026.</p> <p>Development would not take place 'in one go' but would be phased to ensure appropriate facilities and infrastructure are</p>	<p>Add criterion 1 to Appendix F</p> <p>Insert new criterion 1 and renumber existing criterion accordingly;</p> <p>1. <u>Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council to guide development;</u></p>

	<p>available.</p> <p>The proposed requirement for a masterplan would guide future development.</p>	
<p>23. Whilst it is stated that the opportunities for development are at the eastern and western edges of the village and that they would be considered in detail when the Plan is reviewed, Appendix F defines the future growth location covering the whole village in a very general fashion. Furthermore, having so defined the 'growth location' it allows sites from anywhere in the location to be considered before the Plan is reviewed. This is a confused and inappropriate way to consider future growth and will potentially result in ad hoc and unplanned development coming forward contrary to the plan-led approach advocated in the NPPF. If there are genuine opportunities to expand the village they should be clearly presented so that people can clearly see what is being proposed. If that cannot be done now then the Plan should not seek to provide a mechanism for development to come forward through the 'back door'. This is an entirely unacceptable approach and should be deleted from the Plan.</p>	<p>The proposed development criteria will ensure that any new development is of an appropriate mix and scale and integrated with its surroundings.</p> <p>Development would also not take place 'in one go' but would be phased to ensure appropriate facilities and infrastructure are available.</p> <p>The proposed requirement for a masterplan would guide future development.</p>	<p>Add criterion 1 to Appendix F</p> <p>Insert new criterion 1 and renumber existing criterion accordingly;</p> <p>1. <u>Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council to guide development;</u></p>
<p>24. Unlike the other "growth locations",</p>	<p>The expansion of Lenham would be</p>	<p>Add criterion 1 to Appendix F</p>

the opportunities identified in Lenham involve extensive greenfield land. In accordance with NPPF, there should be a pre-disposition in favour of brownfield sites. In the projected time frame (2026 onwards) other land, and potentially brownfield sites, is likely to become available e.g. redundant office space or empty retail space in town centre locations, due to the growth of internet shopping.	undertaken on a planned basis. It is scheduled to commence post 2026. The proposed allocation would be subject to review in 2021 to enable the delivery of other sites etc. that may have come forward to be taken into account The proposed requirement for a masterplan would guide future development.	Insert new criterion 1 and renumber existing criterion accordingly; 1. <u>Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council to guide development;</u>
25. The suggestion to build 1500 new dwellings in Lenham would double its current size, which is contrary to good planning practice, as communities ought to be given time to absorb new development.	The expansion of Lenham would be undertaken on a planned basis. It is scheduled to commence post 2026. Development would not take place 'in one go' but would be phased to ensure appropriate facilities and infrastructure are available. The proposed requirement for a masterplan would guide future development.	Add criterion 1 to Appendix F Insert new criterion 1 and renumber existing criterion accordingly; 1. <u>Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council to guide development;</u>
The land is agricultural land and privately owned. To our knowledge the landowner has not come forward and offered his land for development.	The Council has received indications that land is potentially available through a 'call for sites' process	No change
26. The retention of agricultural land is, in a time of climate change and growing world population, extremely important. In addition, the farmer earns his livelihood from that land. Would the Council, for example, tell any other kind of business	The Council is not advocating the use of Compulsory Purchase powers to bring forward development. The Council has received indications that land within the indicated area of the broad location is potentially available through a 'call for	No change

(such as Marley nearby) that it is considering compulsorily purchasing their land to put to another use against their wishes and interests?	sites' process.	
27. Lenham is the village furthest away from Maidstone within the Borough boundary. If the potential newcomers were to relate at all to Maidstone in their activities such as school, work, or shopping, a development such as this would bring at least 1000 more traffic movements onto the A20 daily.	The proposed development criteria seek to provide inter-alia infrastructure improvements to public transport to reduce reliance on the use of the private car as a mode of transport.	No change
28. The location only vaguely suggested for this development is well outside the core village and would undoubtedly bring many more cars into the village. This same vagueness has the potential to create blight for residents.	The proposed development criteria seek to provide inter-alia infrastructure improvements to public transport cycling and pedestrian movements to reduce reliance on the use of the private car as a mode of transport.	No change

Agenda Item 9

MAIDSTONE BOROUGH COUNCIL

STRATEGIC PLANNING, SUSTAINABILITY AND TRANSPORTATION COMMITTEE

22 JULY 2015

REFERENCE FROM MAIDSTONE JOINT TRANSPORTATION BOARD

1. REPORT OF HEAD OF PLANNING AND DEVELOPMENT – RESULTS OF THE VISUM TRANSPORT MODELLING.

- 1.1 Maidstone Joint Transport Board considered the report of Head of Planning and Development – Results of the VISUM Transport Modelling at its meeting on 22 July 2015. The following recommendation was agreed by the Board.

RESOLVED: That this Board recommends to Kent County Council's Cabinet Member for Highways, Transportation and Waste and to Maidstone Borough Council's Strategic Planning, Sustainability and Transportation Committee that a combination of DS2 and DS3 form the basis of the Integrated Transport Strategy for Maidstone to underpin the Local Plan. This is with the exception of the following and subject to costing to ascertain affordability and the evaluation of feasibility, sustainability and deliverability:

- Additional North/South Park and Ride removed from DS2;
- All references to percentage targets removed from DS2;
- That it is specified that with reference to parking costs, it refers to long-term car parks; and
- That frequent bus services are encouraged with appropriate junction improvements but at no detriment to existing traffic capacity.

Strategic Planning, Sustainability &Transportation Committee

18 August 2015

Is the final decision on the recommendations in this report to be made at this meeting?	Yes
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Results of the VISUM Transport Modelling

Final Decision-Maker	Strategic Planning Sustainability & Transport Committee
Lead Director or Head of Service	Rob Jarman; Head of Planning & Development
Lead Officer and Report Author	Steve Clarke, Principal Planning Officer (Spatial Policy)
Classification	Non-exempt
Wards affected	All

This report makes the following recommendations to the final decision-maker:

1. That the Committee accepts the results of the transport modelling undertaken jointly by MBC and KCC and its implications for the preparation of the Integrated Transport Strategy and the Maidstone Borough Local Plan.

This report relates to the following corporate priorities:

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

Timetable

Meeting	Date
Strategic Planning, Sustainability and Transportation Committee	N/A

Results of the VISUM Transport Modelling

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 Transport is a key area of public policy for the Council (MBC) and a significant element of the emerging Local Plan. This report describes the context and analysis which has been carried out by MBC and Kent County Council (KCC), to inform the preparation of transport policy for the Borough. The Forecasting report for the Maidstone VISUM Transport Model is attached at Appendix 1 and the non-technical summary at Appendix 2.
- 1.2 The report comprises five sections, outlining the need for a transport strategy, the wider policy context, the transport options tested, the test results, and the implications for policy formulation. Three options for the future transport network are tested using the Maidstone VISUM transport model which is jointly commissioned by MBC and KCC. The amount of development modelled was 17,381 housing units, 151,000m² of employment land and 12,100m² of retail. Councillors will note that the housing figure modelled was not the Objectively Assessed Need of 18,560.
- 1.3 The three options are; 'do minimum' (DM), a highways package (DS1), and a sustainable package (DS2) and each option is tested for traffic flows, mode share and network performance. Due to the highways related nature of the model, the sustainable package is tested using a reduced number of vehicle trips by 2031 (1,395 vehicles in the AM peak and 1,351 vehicles in the PM peak) based on an assessment of Department for Transport (DfT) guidance (TAG M5.2) and taking 25% of the recommended allowance in the DfT guidance, as a proxy for the anticipated increase in walking, cycling and increased public transport use which is anticipated to result from the promotion of sustainable transport policies in the Local Plan and national and regional policy.
- 1.4 The results are presented in tables which show how journey times, journey numbers and mode share vary according to the options. As expected, congestion is seen to increase significantly with the 'do minimum' option (DM), with slightly less congestion for the 'highways package' (DS1) which includes the construction of the 'Leeds – Langley by-pass' and the greatest reduction is for the 'sustainable package' (DS2) which includes the same local highways improvements as DS1 (except for the Leeds-Langley by-pass) and a range of sustainable transport measures implemented.
- 1.5 Kent County Council has also carried out a fourth model option test known as DS3. This has modelled a revised housing number of 16,247 homes and a revised distribution pattern with 965 houses provided to the east of the proposed Leeds Langley Bypass (tested in the model) with 200 at Leeds and 765 in the Kingswood area. It includes the same highway capacity improvements as DS1 and DS2 and the changes in the area of M20 junction 7, at the A20/New Cut junction and Hermitage Lane pedestrian signals modelled in DS2 as well as increased bus frequency on radial routes of every 10 minutes (DS2 was every 7 minutes), and increased town centre parking costs (+50% by 2031) at publicly controlled car parks (also in DS2). The findings are attached in a summary report (attached at Appendix

5) that was presented to the Maidstone Joint Transportation Board on 22 July 2015.

1.6 A fifth model option test has been carried out by Kent County Council known as DS3a. This has modelled a similar quantum of housing to that modelled in DS1 and DS2. However, details of the specific quantum and the distribution pattern were unavailable at the time of writing the report.

1.7 The results of the transport modelling suggest that in Maidstone over the next 15 years, we will see a substantial increase in travel demand due to new development and background growth. While highway improvements can go some way to ameliorating the situation, they will not be enough to mitigate this increase. Network conditions are likely to continue to deteriorate from the present situation unless measures are put in place to reduce travel demand.

2. INTRODUCTION AND BACKGROUND

2.1 Transport is a key area of public policy for local authorities and a significant element of the emerging Maidstone Borough Local Plan (MBLP). As such, it is important that all those involved in the formulation of policy in this crucial area have a coordinated policy position.

2.2 This report comprises five sections as follows:

- Need for a transport strategy for Maidstone
- National, regional and local context for policy development
- Transport options tested
- Results of transport options testing
- Implications for the transport strategy

2.3 The content is drawn primarily from the draft Maidstone Integrated Transport Strategy (ITS) which has been prepared by the Planning Policy team. The principal partner in the strategy preparation is Kent County Council which has been directly involved through modelling and options testing undertaken by Amey, consultants commissioned by KCC and MBC.

Need for an integrated transport strategy

2.4 Maidstone, as the county town and dynamic borough, faces transport challenges which are not uncommon across the country. These challenges may be characterised as increasing road congestion which arises as a result of population and private car usage growth, leading to environmental degradation and health and environmental implications through more pollution, parking and so on.

2.5 Furthermore, Maidstone has relatively poor public transport infrastructure compared with similar sized towns in the South East such as Dartford/Gravesend, Chelmsford and compares unfavourably with neighbouring towns in Kent. 2011

census data shows that Maidstone has a higher than average usage of, and dependence on, the private car and there are also economic implications from lost time and perceptions that conditions are deteriorating significantly.

- 2.6 As well as existing conditions, the Local Plan which the Borough is required to produce proposes approximately 18500 extra houses and more employment and economic activities throughout the Borough, and clearly there are impacts on transport networks which need to be mitigated if the situation is not worsen. However, future planning needs to be kept separate from dealing with the present situation and existing concerns should not fetter a full understanding of the implications of future development which will continue whether there is a plan or not.
- 2.7 The strategy that is needed for Maidstone should also be an integrated one, which means that it is necessary for it to encompass transport provision across all modes. Recent research has shown comprehensively that traffic always outgrows road capacity if no other demand restricting measures are put in place, and this would certainly be the case in Maidstone. The strategy will also need to take account of the borough's geography as sustainable modes of transport are more feasible in some locations and for some journeys than others.

National and regional context

- 2.8 National transport policy is the responsibility of the Department for Transport (DfT) and local authorities through the statutory planning process. The DfT's stated vision is for:
- “a transport system that is an engine for economic growth but one that is also greener and safer and improves quality of life in our communities”
- 2.9 This vision is reflected in the National Planning Policy Framework (NPPF) which emphasises the importance of rebalancing the transport system in favour of sustainable transport modes whilst encouraging local authorities to plan proactively for the transport infrastructure necessary to support growth.

Paragraphs 29 & 30 state:

'29. Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.'

'30. Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.'

Paragraphs 34 and 35 state:

'34. Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of

sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas.

35. Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to

- accommodate the efficient delivery of goods and supplies;
- give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
- create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
- incorporate facilities for charging plug-in and other ultra-low emission vehicles; and
- consider the needs of people with disabilities by all modes of transport.'

Paragraph 41 states:

'41. Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice.'

2.10 Similarly, KCC in its overall 'Vision for Kent', the county-wide strategy for the social, economic and environmental wellbeing of Kent's communities has three major ambitions:

- "Grow the economy by supporting business, including improvements to the transport network and the provision of broadband
- Tackle disadvantage by..... provision of comprehensive, reliable and affordable public transport
- Put the citizen in control...including support for community bus and rails schemes."

2.11 While the Transport Delivery Plan for Kent (2010) concentrates on major strategic issues such as the Lower Thames crossing, Operation Stack and Foreign Lorry Road Charging, the Local Transport Plan for Kent (2011) re-emphasises; 'Growth without Gridlock', 'A Safer and Healthier County', 'Supporting independence', 'Tackling Climate Change' and 'Enjoying Life in Kent' and the promotion of sustainable transport policies.

Local policy context

2.12 The above national and county policy context and MBC's own Sustainable Community Strategy (2013) (SCS) promotes the integrated nature of a transport strategy for the Borough. The SCS acknowledges the significance of congestion and the overriding aim of an integrated transport strategy to provide genuine transport choice for residents, businesses and visitors.

- 2.13 The Maidstone Borough-wide Local Plan 2000 recognises the need for the promotion of sustainable transport and encouraging a modal shift away from a reliance on the use of the private car. It recognises the need to produce an integrated Transport Strategy (policy T1) and the need to prioritise bus and hackney carriage access along identified corridors (Policy T2) and promoted Park & Ride (policy T17).
- 2.14 The present draft MBLP, known as the Regulation 18 version, is presently being consulted widely, and incorporates policies for sustainable transport and the promotion of public transport. These will be strengthened as a result of representations made for inclusion in the Local Plan Publication which is the next stage of plan preparation.
- 2.15 Existing draft policies seek to promote accessibility, and economic prosperity, and the significance of Maidstone as a regional transport hub. Specifically, improvements to the transport network identified in the Local Plan include minor highways improvements and the promotion of public transport including park and ride and bus prioritisation.

Transport modelling

- 2.16 In support of the preparation of the draft ITS and transport policies, KCC and MBC have jointly commissioned traffic modelling, using the existing Maidstone VISUM model, to assess the impact of alternative transport infrastructure options on Maidstone's transport network at a strategic level. VISUM assesses the impact of forecast demand for travel by car, commercial vehicle, bus and rail and aims to give a "big picture" output to inform strategic, rather than tactical, decisions.
- 2.17 The model tests the impacts of highway improvements, bus service changes and other transport interventions to ascertain their impacts on Maidstone's highway network performance. It provides important information on which to inform future policy decisions regarding capital investment and promotional activities.
- 2.18 Five scenarios for travel patterns within the Borough have been tested using the VISUM model relating to the period covered by the Local Plan, up to 2031, as follows:
- 2031 Do Minimum (DM) forecast. This models the situation in 2031 based on the impacts on the existing transport network (plus 'committed schemes') of an additional 17,381 houses, 151,000 m2 of employment, 12,100 m2 of retail space and the Bridges Gyratory Scheme built, but with no further actions taken in terms of network improvements. This provides the worst case scenario for the transport network in the future and is used as a benchmark for understanding the predicted impacts of two further transport schemes (tested in subsequent model runs) which may be implemented in the future.
 - 2031 The Highway Package (DS1): the impacts of new development as in DM above on the transport network which includes a range of small scale

junction improvements and the development of the Leeds – Langley bypass. A list of the interventions for DS1 is attached at Appendix Three.

- 2031 The Sustainable Package (DS2): the impacts of new development as in DM above on the transport network which includes the implementation of a range of sustainable transport initiatives, including improved bus frequencies, a Linton Crossroads Park and Ride service and enhanced walking and cycling facilities. A list of the interventions for DS2 is attached at Appendix Four.
- 2031 DS3: Includes the same highway capacity improvements as DS1 and DS2 and the changes in the area of M20 junction 7, at the A20/New Cut junction and Hermitage Lane pedestrian signals modelled in DS2 as well as increased bus frequency on radial routes of every 10 minutes (DS2 was every 7 minutes), and increased town centre parking costs (+50% by 2031) at publically controlled car parks (also in DS2).

Whilst DS3 includes the Leeds-Langley bypass as in DS1, it has tested a lower number of houses: 16,247. The spatial distribution of development is also different and 965 houses have been modelled located to the east of the new road (approximately 200 at Leeds and 765 in the Kingswood area).

- 2031 DS3a: Includes the same transport interventions as DS3. It has tested a similar number of houses to DS1 and DS2 although details of the specific quantum and distribution of housing were unavailable at the time of writing. KCC report that under this scenario the transport network would operate significantly better than DS1 and only slightly worse than DS2, although the results of the model run were unavailable at the time of writing. Accordingly, the results of the DS3a model run have not been included in the table below. This report thereafter considers the results of the four traffic modelling scenarios DM, DS1, DS2 and DS3 only.

Model Run Results

TRIPS	2014	2031 (DM)	% change from 2014	2031 (DS1)	% change from 2014	2031 (DS2)	% change from 2014	2031 (DS3)	% change from 2014
Person trips	50300	58600	17%	58600	17%	56600	12%	57,800	+15%
Vehicle trips	35500	41500	17%	41600	17%	37700	6%	38,600	=9%
MODE SHARE	2014 %share	2031 (DM) %share	% change from 2014	2031 (DS1) %share	% change from 2014	2031 (DS2) %share	% change from 2014	2031 (DS3)	% Change from 2014
Car	80%	81%	1%	82%	2%	75%	-5%	76%	-4%
Bus	11%	11%	0%	10%	-1%	15%	4%	15%	4%
Rail	9%	8%	-1%	8%	-1%	10%	1%	9%	0%
NETWORK PERFORMANCE	2014	2031 (DM)	% change from	2031 (DS1)	% change from	2031 (DS2)	% change from 2014	2031 (DS3)	% change from 2014

			2014		2014				
Total travel distance (vehicle km)	121900	144300	18%	146600	20%	126800	4%	135,500	+11%
Total travel time (vehicle hours)	8200	11400	38%	10800	30%	8500	3%	8,800	+7%

2.19 The results of the four traffic modelling scenarios have been analysed, and in all four cases tested, the network performance is expressed in terms of traffic flows and minutes of delay on the road network in the AM peak, which is generally worse than the PM peak, in comparison with the current situation (2014 base year). It should be noted that 84% of the additional traffic flows are the result of the planned new development, and 16% comprises what is termed as 'background growth', or the result of 'natural' increase without extra development.

2.20 As mentioned above, the DM scenario provides a 'worst case' in that no improvements other than the Bridge Gyratory are included. Consequently, journey times would be extended throughout the network due to increased traffic flows and this may be used as a benchmark to gauge the impact of alternative scenarios where investment takes place.

2.21 The DS1 scenario is essentially a highways based option which shows a similar increase from 2014 in the total number of trips taken when compared with the 'do minimum' option.

2.22 The DS2 scenario promotes sustainable transport and public transport, walking and cycling. As a strategic highway model, there are limitations to VISUM's ability to take into account more localised sustainable transport measures. As such, the anticipated increase in walking and cycling in DS2 can only be represented in the model by a reduction in vehicle trips and this can be seen on the slide.

2.23 The DS3 scenario tested a lower number of dwellings in a different spatial pattern of development and as such is not strictly comparable with the other three scenarios tested. Nevertheless, the outcomes are worse in all cases than the DS2 scenario.

Total trips

TRIPS	2014	2031 (DM)	% change from 2014	2031 (DS1)	% change from 2014	2031 (DS2)	% change from 2014	2031 (DS3)	% change from 2014
Person trips	50300	58600	17%	58600	17%	56600	12%	57,800	15%
Vehicle trips	35500	41500	17%	41600	17%	37700	6%	38,600	9%

2.24 For both DM and DS1, it can be seen that both person and vehicle trips increase by 17% when compared with 2014 levels. The DS2 option then reduces the total

number of trips to reflect the planned introduction of sustainable transport policies and the reduction of trips proposed.

2.25 In assessing this aspect of the model, rather than basing it on achieving a specific mode share, DfT guidance (TAG M5.2), which it is acknowledged is not specific to walking and cycling, has been examined to help identify how car travel can be removed if investment in walking and cycling is made. A figure of 25% of the levels recommended in the DfT guidance has then been used. The net result is a reduction by 2031, of 1,395 vehicle trips in the AM peak and 1,351 vehicle trips in the PM peak. Such an approach has been underlined by studies in towns like Darlington, Worcester and Peterborough where walking and cycling has increased as a result of the introduction of sustainable transport policies which produce less person and vehicle trips as a result.

2.26 DS3 performs better than DM and DS1 but not as well as DS2.

Mode share

MODE SHARE	2014 %share	2031 (DM) %share	% change from 2014	2031 (DS1) %share	% change from 2014	2031 (DS2) %share	% change from 2014	2031 (DS3)	% change from 2014
Car	80%	81%	1%	82%	2%	75%	-5%	76%	-4%
Bus	11%	11%	0%	10%	-1%	15%	4%	15%	4%
Rail	9%	8%	-1%	8%	-1%	10%	1%	9%	0%

2.27 The four modes shown show quite similar results for the DM and DS1 options, with slight increases in car use for both options from 2014, similar slight variations between DM and DS1 in bus and rail use. The DS2 option shows a 7% increase in public transport use (5% bus+ 2% rail) and 6% decrease in car use.

2.28 It should be noted that the car mode share includes Park and Ride trips for all options, and accounts for 1% of car trips in DM and DS1 but this rises to 4% in DS2. For DS3 the Park & Ride option at Linton has not been modelled. There will be a need for effective bus prioritisation measures to assist in the running of an effective Park & Ride system as well as other service buses in order that there is a time-advantage in taking the bus rather than continuing the use of the private car. Such measures would need to be reflected in the emerging policies of the Local Plan and also the ITS.

Network performance

NETWORK PERFORMANCE	2014	2031 (DM)	% change from 2014	2031 (DS1)	% change from 2014	2031 (DS2)	% change from 2014	2031 (DS3)	% change from 2014

Total travel distance (vehicle km)	121900	144500	18%	146700	20%	126900	4%	135,500	11%
Total travel time (vehicle hours)	8200	11400	38%	10800	30%	8500	3%	8800	7%

2.29 For DM, it can be seen that the 'do minimum' option demonstrates considerable increases in distances travelled (18%) but an even greater increase in travel time (38%), highlighting that congestion increases across the network. This is to be expected, and results for specific road links tested are consistent (such as A20 Ashford Rd, A274 Sutton Road, and A229 Loose Road), indicating that an average additional 3 to 4 minutes is added to journey times for these links (NTS Figure 3-5 AM peak).

2.30 For DS1, both total travel distance and time taken increase by 20% and 30% respectively from 2014 and the total distance travelled is slightly greater (2%) than the DM option which may be due to choosing to use the new Leeds – Langley bypass as opposed to other local roads. Despite the increase in distance travelled compared with the DM option, travel time decreased by 6%, suggesting less congestion when compared with DM. Thus, while network performance deteriorates from 2014 with this option, it is a bit better than DM. Looking at the three specific important links tested (A20, A274, A229), it will take between 1.5 and 2.5 minutes longer to travel these links than at present (2014), and up to 2 minutes less than the DM option to travel the same links. (Figure 3-5).

2.31 For DS2, both total travel distances and time taken are marginally increased (by 3% and 4% respectively.) from 2014 but reduced compared with DM (by 12% and 26% respectively.) Looking at the three specific links, journey times are within one minute greater or in some instances quicker than the present situation (2014).

2.32 For DS3, both total travel distance, (a similar situation to DS1 in that the new bypass road may be chosen as opposed to other local roads) and also total travel time increase. This also performs better than the 2014 situation, however, DS2 still performs better overall.

3. AVAILABLE OPTIONS

3.1 Ultimately in Maidstone, over the next 15 years, there will be a substantial increase in travel demand due to both new development and also background growth that will happen anyway. While highway improvements can go some way to ameliorating the situation, they will not be enough to mitigate this increase, and network conditions will continue to deteriorate from the present situation.

- 3.2 Government advice in the NPPF is clear in its emphasis on the importance of rebalancing the transport system in favour of sustainable transport modes whilst encouraging local authorities to plan proactively for the transport infrastructure necessary to support growth.
- 3.3 It could be said that the only way to improve matters is to reduce the number of cars on the network and the incorporation of the demand reduction policies so clearly set out in national, county and local policies and programmes, into the Maidstone Borough Local Plan.
- 3.4 The alternative to this approach is a reliance on highway improvements as a way forward with no additional and specific sustainable transport measures. This is not advocated in Government advice.

4 PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS

- 4.1 That the Committee accepts the results of the transport modelling undertaken jointly by MBC and KCC and its implications for the preparation of the Integrated Transport Strategy and the Maidstone Borough Local Plan.

5 CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
Impact on Corporate Priorities	The adoption of the local plan will assist in the delivery of the Council's corporate priorities	Head of Planning & Development
Risk Management	A key risk to the local plan programme relates to the Council's ability to provide a package of sustainable transport measures alongside the infrastructure necessary to support planned growth.	Head of Planning & Development
Financial	The cost of the modelling has been funded jointly by MBC and KCC. The cost has been met from the existing budget. The financial implications of the modelling will need to be assessed to identify and address the funding requirements. The funding requirements will need to take account of available resources which may impact on other council priorities.	Section 151 Officer & Finance Team
Staffing	N/A	Head of Planning & Development
Legal	There are no legal implications directly arising from this report, although the Legal Team continues to provide advice and guidance on local plan matters and to review any legal implications of reports	Legal Team

Equality Impact Needs Assessment	An integrated transport strategy 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 on 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.	Policy & Information Manager
Environmental/Sustainable Development	The implementation of an integrated transport strategy 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 on highway improvements is likely to generate more traffic than the additional capacity provided, increasing congestion and carbon emissions.	Head of Planning & Development
Community Safety	N/A	Head of Planning & Development
Human Rights Act	N/A	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	Head of Planning & Development & Section 151 Officer
Asset Management	N/A	Head of Planning & Development

6 REPORT APPENDICES

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

- Appendix 1: Forecasting Report Maidstone VISUM Transport Model
- Appendix 2: Forecasting Report Non-technical Summary Maidstone VISUM Transport Model
- Appendix 3: List of transport interventions for DS1
- Appendix 4: List of transport interventions for DS2
- Appendix 5: KCC report on DS3 presented to Maidstone Joint Transportation Board on 22 July 2015

7 BACKGROUND PAPERS

None



Forecasting Report

Maidstone VISUM Transport Model

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Document Control Sheet

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1 Introduction

Amey have been commissioned by Kent County Council (KCC) and Maidstone Borough Council (MBC) to provide transport modelling support to assess the traffic impact of Local Plan options for Maidstone District.

The commission involves the use of the existing Maidstone VISUM model which was developed by Jacobs on behalf of KCC and MBC. The model is to be used to assess the impact of the forecast demand for travel by car, commercial vehicle, bus and rail with alternative development and transport infrastructure options.

Forecast models were specified for a 2031 Do Minimum model, to provide a benchmark, and alternative 2031 Do something scenarios to assist in the Local Plan decision making process. The 2031 forecast scenarios modelled have arisen around differing aspirations and different approaches to tackling existing and forecast transport issues.

2 Background

2.1 Existing VISUM Model

The Maidstone VISUM model was developed to assist in the development of the Local Development Framework (LDF) and to assess the transport impacts of future developments in Maidstone District. The original Maidstone model was developed as a multi modal, variable demand model validated against AM and PM 2007 base year conditions and was further developed to produce 2026 forecast year models for a range of different scenarios.

The detailed modelled area encompasses the urban area of Maidstone District and includes the M20 corridor to the north of the town. The wider network, modelled in less detail, extends to include all the major approaches to the town.

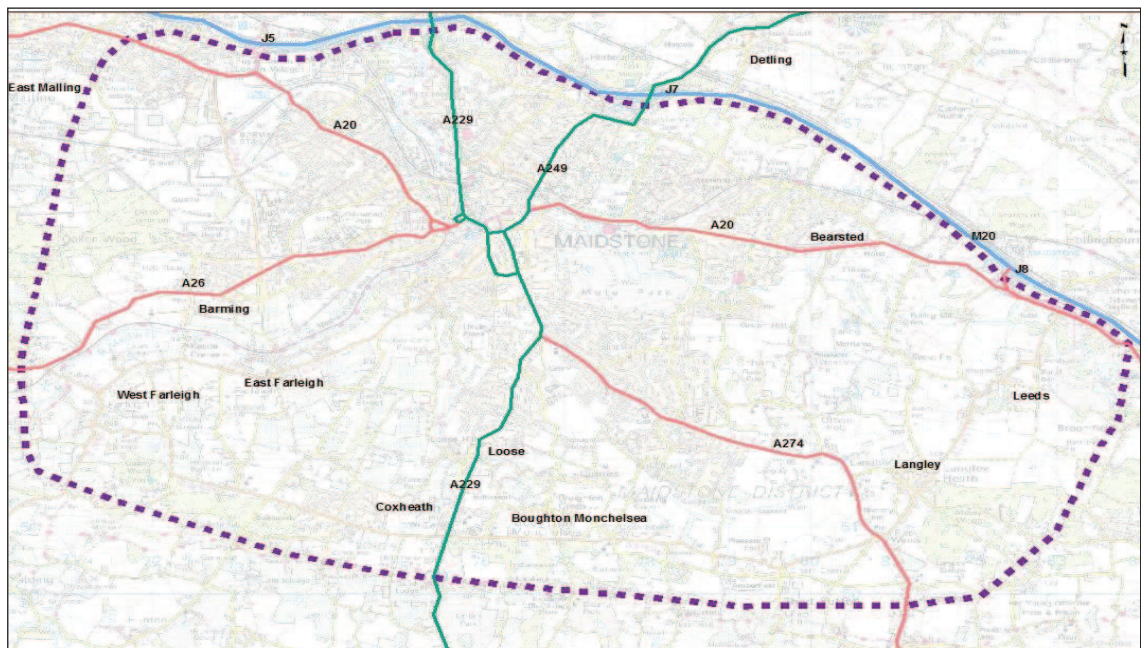


Figure 2.1: Detailed Model Area Plan

2.2 Modelling Approach

A review of the Maidstone model files that were provided was carried out to establish the content of the model and data available. Based on this review a modelling approach was proposed for the development of forecast models to represent 2031.

Amey have undertaken similar local plan testing for other Kent districts using existing models. Each of the models differs in content and application to some degree, but the approach taken has been essentially the same.

The model process involves the generation of reference matrices from an existing start point, which in this case is the 2007 Base model. The forecast matrices are developed using planning data, trips rates derived from TRICS which were used in previous models and local growth factors from TEMPRO.

Base matrices are furnished to forecast trip totals, with relevant adjustments to account for empty zones or sparse distributions, to produce new reference matrices.

The new reference matrices are assigned to the network which includes any changes proposed to the highway or public transport provision. The new assignment allows for skims to be generated for travel costs which are used for the main incremental mode choice for car, bus and rail trips.

Park and ride cars are determined from a sub-mode choice of home based car trips to estimate the 'car all the way' and 'car with park and ride' element. For the PM peak model the AM peak park and ride car trips are transposed and adjusted to reflect the PM movement

It should be noted that with this approach the forecast trip distribution is not based on a variable demand response but is built upon the base model trip distribution. The AM and PM models are not linked and there is no time of day choice modelling adjustment.

3 2014 Model

3.1 Model Development

Due to the age of the existing base model the first step was to develop a version to represent a 2014 baseline and to carry out a sense check against available data to establish whether the model continued to provide a reasonable reflection of the travel pattern in and through the town.

The 2014 model has been developed to include all known information about development and transport infrastructure changes from 2007 to 2014 which has been incorporated into the base model. A high level sense check of the model performance was then carried out using available count and journey time data.

3.2 2014 travel demand

The 2014 Maidstone model incorporates identified land use changes between the base year 2007 and 2014. This is based on data was provided by MBC for planning approvals, consents and completions up to 2014. The net development quanta incorporated into the 2014 model is summarised in Table 3-1 below. The development identified is reasonably well distributed across the district and is unlikely to have a significant impact on the pattern of distribution of traffic.

Table 3-1: 2014 Development

Development	Net increase
Houses	4166 units
Employment	14693 m ²
Retail	19693 m ²

Trip generation for the new development was based on established TRICS data used in the previous forecast models. External traffic movements with no trip end in Maidstone (which include some of the M20 traffic) were updated to 2014 based on average growth for the south east established from TEMPRO.

3.3 2014 Transport Infrastructure

All known changes to transport infrastructure and other modelled elements from 2007 were included in the 2014 model. The network changes incorporated are comparatively limited in their impact on traffic movement around the town. The changes made for the 2014 model include:

- New signals at the junction of Cripple Street with A229 Loose Road;
- Access to Sittingbourne Road Park & Ride site including traffic signals;
- Access to new hospital site adjacent to Newnham Court on Bearsted Road;
- Updated bus services; and
- 2007 Bus fares and car parking charges adjusted to reflect current costs.

3.4 2014 Model Output

A review of the 2014 model was carried out as a sense check of the model performance and not as a full validation exercise. The review is based on the traffic flow and travel time data that was readily available from a number of sources.

For the journey time output the standard DMRB criteria for the validation of journey times has been used as an indicator of the network performance. The model traffic flows have been compared with observed data at 58 locations across the town, using the standard DMRB criteria for link flow assessment. In addition model flows were compared with observed data at 25 locations on the M20 corridor.

Of the 58 link flows within Maidstone, 78% and 72% of the AM and PM peak modelled flows respectively met the normal acceptable criteria.

Inbound and outbound journey times on the radial routes met the normal acceptable criteria in all but 2 cases in the AM peak. All the PM journey times met the criteria.

A summary of the link flow and journey time data and model performance is contained within **Appendix A**.

The 2014 AM and PM models were considered to provide a reasonable representation of the current travel conditions within Maidstone.

4 Outline of Forecast Model Scenarios

4.1 Overview

All of the 2031 forecast model scenarios tested to date include the same development assumptions based on forecast housing, employment and retail data provided by Maidstone Borough Council. As the planning input data has remained constant, the key difference between the options tested is the packages of transport interventions which have been proposed to mitigate the planned growth within the district.

The sections below provide an overview of the modelled forecast scenarios:

4.2 2031 Do Minimum Model (2031 DM)

The 2031 Do Minimum (2031 DM) model was developed from the validated 2007 base model and includes the same infrastructure changes identified for the 2014 model and the same assumptions for car park and bus fare costs.

The travel demand was developed from the base year model, based on known development from 2007 to 2014 and forecast development assumptions to 2031, as provided by Maidstone Borough Council.

The only significant change to the highway network for 2031 Do Minimum was the proposed Bridges Gyratory Scheme. Progress is being made on this scheme design which is expected to be in place before 2031 and it is therefore included in all the forecast models as a committed scheme.

4.3 2031 Do Something Model 1 (2031 DS1)

The 2031 Do Something 1 (2031 DS1) model is essentially based around highway infrastructure changes. A number of the changes to the highway infrastructure, such as junction improvements, are anticipated to occur as a consequence of specific developments.

The 2031 DS1 Model also includes a major highway change with the inclusion of a Leeds / Langley bypass route option. The route included in the model is indicative only and is based on broad assumptions about the route standard, junction arrangements and other highway based changes.

The forecast development scenario and the travel demand generated for the 2031 DS1 model is the same as for the 2031 DM model.

4.4 2031 Do Something Model 2 (2031 DS2)

The 2031 Do Something (2031 DS2) model is developed around measures set out in the MBC Integrated Transport Strategy, contained in **Appendix B**, although it was not possible to model all of the measures listed. The model includes highway infrastructure changes, public transport changes and measures to reflect policy changes (e.g. public parking charges).

The forecast development remains the same as that for the 2031 DM and 2031 DS1 models. However the 2031 DS2 model also includes assumptions around the proportion of walking and cycling trip and the level of car sharing. This has an impact on the net travel demand modelled, which is lower than that for the 2031 DM and 2031 DS1 models.

5 Model Outputs Assessed

The Maidstone model is a strategic level model providing an overview of how traffic responds to changes in demand, highway and public transport provision and policy changes across the modelled network. Output from the model has been extracted to provide a measure of the level of demand for different scenarios and the subsequent impact on the overall network performance and efficiency.

5.1 Travel Demand

Total Travel Demand

Travel demand within the model refers to trips made by car, light goods vehicles (LGV), heavy goods vehicles (HGV), bus or rail. Walking and cycling modes of travel are not modelled specifically. However assumptions about the expected level of walk and cycle trips can be allowed for in the estimate of trip generation. Forecast travel demand is determined by the 2031 development allocation and on assumptions around factors such as car occupancy and sustainable modes of travel.

Mode Choice

Mode choice is estimated for home based trips on the assumption that these trips are most likely to have the opportunity for modal shift. Trips for employers business and non-home based purposes are considered to be less likely to change mode.

The choice of mode of travel, by car, rail or bus, is calculated within the model based on the generalised cost of travel for each mode. Travel costs are derived from car parking costs, vehicle operating costs, travel time, bus and rail fares. The attraction of bus and rail is also dependant on the origin and destination of trips, the accessibility of public transport at each end of the journey, service provision and the level of delay experienced by drivers. The model does not take into account issues around bus or rail capacity.

The proportion of trips made by car, bus or rail provides an indication of the net impact of changes to public transport, travel costs and highway infrastructure.

Park and Ride

The park and ride model is secondary to the main mode choice for public transport. The cars that might be expected to switch to park and ride are estimated based on the AM peak highway assignment and a simple mode choice model.

The PM peak park and ride car journeys are assumed to mirror the AM peak trips which are transposed and adjusted to reflect the PM peak rate of returns.

The number of cars that might be expected to use park and ride facilities is estimated based on travel time and travel costs by bus and by car. The travel time by bus is affected by the location of bus stopping points in relation to the final destination and the frequency of bus service provided. The car travel time is influenced by the location and accessibility of the park and ride sites.

There is an element of geographic restriction incorporated within the model to avoid trips originating in the town centre driving out to the park and ride site and returning to the town by bus.

The model does not specifically account for the capacity of park and ride sites. The Park and Ride trips are based on the highway assignment and are recorded in the vehicle trips. The bus leg of the journey is not included in the bus trips.

5.2 Network Performance

The network performance within the forecast scenario tests has been assessed using the following key indicators:

- Total vehicle distance travelled (vehicle kilometres)
- Total travel time (vehicle hours)
- Average network speed (kph)

The total vehicle kilometres travelled and total vehicle hours recorded on the network, in relation to the number of trips made, provide an indication of the level of efficiency of the network. Higher vehicle kilometres indicate that people have to travel further or take longer routes to reach their destination. Higher vehicle hours indicate that people are taking longer to travel to their destinations suggesting a more congested network. The average network speed is based on the total travel time and travel distance metrics set out above.

5.3 Link Flows

Representative link flows on key routes have been selected to provide an indication of the level of impact on different parts of the network. The locations of the links used are shown in Figure 5.1 below and are listed in Table 5-1.

Link flows are the net result of the different infrastructure or policy changes applied. The impact of the changes may complement each other or they may negate any impact.

Figure 5.1: Link Flow Locations Plan

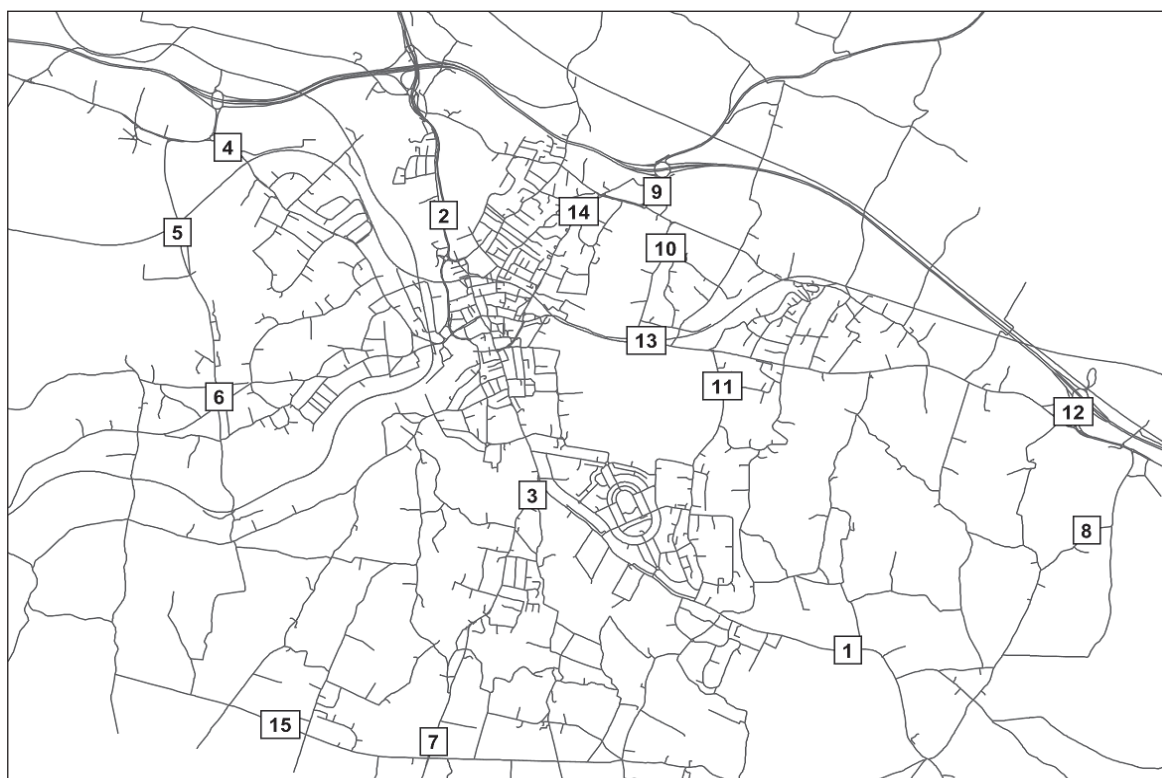


Table 5-1: Link Locations

Site	Location
1	A274 (W) Sutton Road
2	A229 (N) Royal Engineers Way
3	A229 Loose Rd
4	A20 London Road
5	Hermitage Lane
6	A26 Tonbridge Rd
7	A229 Linton Rd
8	B2163 Lower St
9	A249 (M20 J7)

Site	Location
10	New Cut Rd
11	Willington St
12	M20 J8 Spur Road
13	A20 Ashford Rd
14	A249 Sittingbourne Rd
15	B2163 Heath Road

5.4 Journey Times

Journey times have been extracted from selected routes to provide some insight into the impact of different scenarios on specific areas of the network. The journey time routes used are shown in Figure 5.2 below and are listed in Table 5-2.

Figure 5.2: Journey Time Route Locations Plan

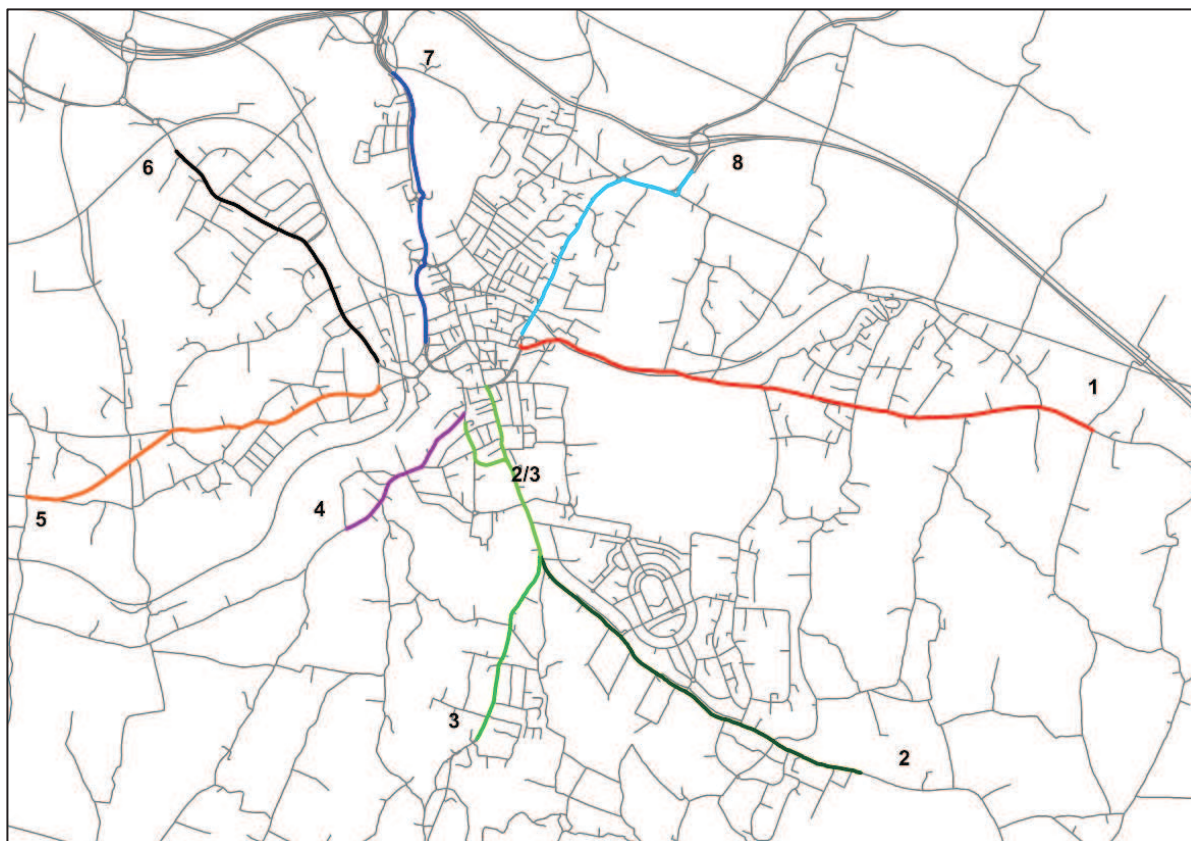


Table 5-2: Travel Time Routes

Route	
1	A20 Ashford Road
2	A274 Sutton Road
3	A229 Loose Road
4	B2010 Farleigh Hill
5	A26 Tonbridge Road
6	A20 London Road
7	A229 Royal Engineers Way
8	A249 Sittingbourne Road

6 2031 Development Allocation (as provided by MBC)

The forecast quantum of development for the Borough has been kept constant between the 2031 DM, 2031 DS1 and 2031 DS2 model scenarios. The forecast housing and retail and employment allocation for 2031 have been provided by MBC.

The 2031 employment and retail allocation includes Local Plan allocations for employment and mixed use sites. Table 6-1 summarises the housing (units), commercial and retail development (m²) incorporated into the 2031 forecast models. Details of the developments included within the forecast models is provided in **Appendix C**.

Table 6-1 – Forecast Development Quantum

Development Type	Forecast Development for 2031
Houses	17,381 units
Employment land	151,000 m ²
Retail use	12,100 m ²

6.1 Housing

The housing allocation includes completions to 2014, approved sites, extant permissions, Local Plan allocations, sites expected to come forward and an allowance for windfall sites.

6.2 Retail

The forecast retail allocation included in the model to 2031 is comparatively small, based on information provided from the Local Plan. The key retail locations are Newham Court, Maidstone East station, Maidstone Sorting Office, King Street car park and the former AMF Bowling site.

6.3 Employment

The employment allocation identified in the Local Plan includes development at sites outside or on the fringe of the urban area e.g. Marden, Headcorn, Yalding, Coxheath. The largest employment allocation within the town is the medical facility at Newnham Park.

7 2031 Do Minimum Model Review

7.1 Summary Description

The 2031 Do Minimum model represents a 'worst case' scenario where forecast development for 2031 is complete but only committed transport interventions are included. This scenario is not expected to occur but is used as a benchmark against which to view the alternative Do Something scenarios.

7.2 2031 Do Minimum Model Assumptions

For the 2031 Do Minimum model the only additional change to the highway network, over and above those introduced for the 2014 model, is the inclusion of the Bridges Gyratory improvement. This scheme diverts northbound traffic from the A229 Bishops Way via a new link directly to the A229 northbound exit of the Bridges gyratory. Traffic on this link avoids circulating around the gyratory via the two river bridges.

This scheme is also included in the 2031 DS1 and 2031 DS2 models.

7.3 Travel Demand

The 2031 DM total travel demand, in person trips, arising from the forecast development represents an increase of 17-18% over the 2014 baseline. There is a similar proportional increase in the vehicle demand on the network. The total person and vehicular demand on the network is summarised in Table 7-1 below.

Table 7-1: Total Travel Demand

	AM Peak		PM Peak	
	2014	2031 DM	2014	2031 DM
All person trips	50300	58600	44900	52800
% diff from 2014		17%		18%
All vehicles	35500	41500	32,000	38000
% diff from 2014		17%		19%

Cars currently account for 80-83% of the peak vehicle traffic modelled, including park and ride cars which account for less than 1%. Heavy goods vehicles (HGVs) account for 6-7% of traffic and light goods vehicles (LGVs) 12-13%. This composition of vehicle traffic remains similar for the 2031 forecast demand.

The composition of trips made in the AM and PM peaks differs by journey purpose and by mode of travel. The proportion of trips by car, bus rail for the 2031 DM model are similar to the 2014 model. Person trips made by car in the AM peak account for around 81% with 11% travelling by bus and 8% by rail. There is a slightly higher proportion of people travelling by car in the PM peak. The mode share for the 2031 Do Minimum model remains unchanged for the AM peak and with minor changes in the PM peak. The peak hour modal split is summarised in Table 7-2 below.

Table 7-2: Modal Split

Person Trips	AM Peak		PM Peak	
	2014	2031 DM	2014	2031 DM
Car (all purposes)	80%	81%	83%	84%
Bus trips	11%	11%	8 %	8%
Rail trips	9%	8%	9%	8%

7.4 Network Performance

The increased demand on the network in the 2031 Do minimum model that arises from forecast development is reflected by an increase in the total vehicle kilometres travelled across the detailed modelled area. The total vehicle kilometres increase from 2014 by 18% in the AM peak and 21% in the PM peak.

The increase in total travel time for the 2031 DM is significantly more than that for travel distance, suggesting an increase in the level of congestion on the network.

The net result is a decrease in the network wide average vehicular speed in both peaks.

Table 7-3: Network Performance Summary

	AM Peak			PM Peak		
	2014	2031 DM	% diff	2014	2031 DM	% diff
Total Travel Distance (veh km)	122000	144500	18%	113400	137500	21%
Total Travel Time (veh hrs)	8300	11400	38%	7000	10000	42%
Average Vehicle Speed (kph)	15	13		16	14	

7.5 Link Flows

The locations of the link flows provided have been selected to provide a reasonable snapshot of traffic demand across the network. In some locations there may be a number of factors affecting local traffic movements, the net result being a minimal change in flows.

The majority of the links show an increase in traffic flow for the 2031 Do minimum compared to the 2014 model, reflecting the increase in travel demand due to forecast development (Figure 7.1 and Figure 7.2).

Figure 7.1: 2014 & 2031 DM - AM Peak Two-way Flows

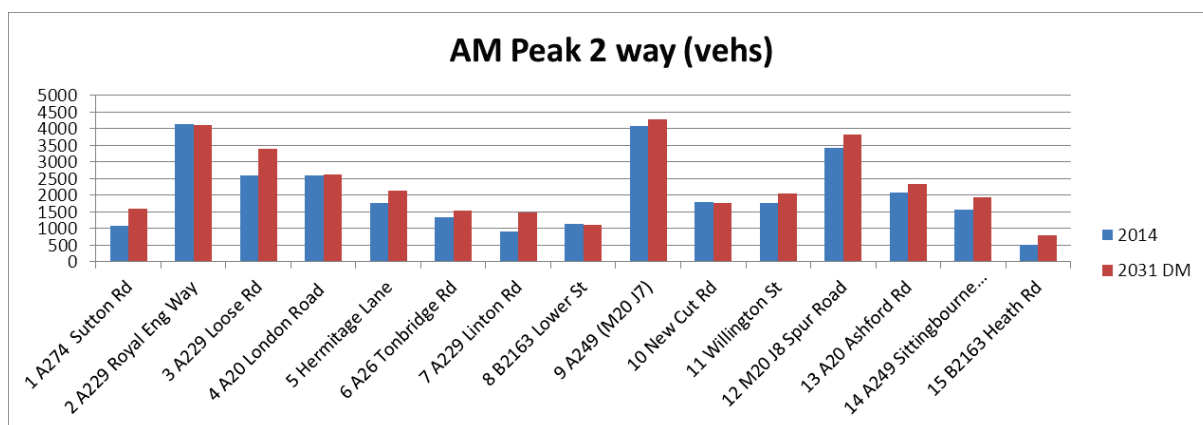


Figure 7.2: 2014 & 2031 DM - PM Peak Two-way Flows

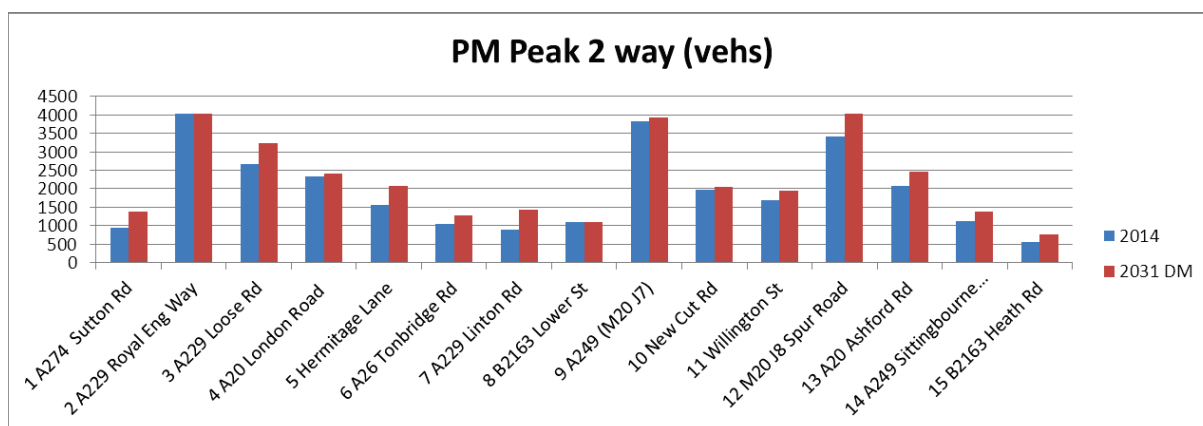
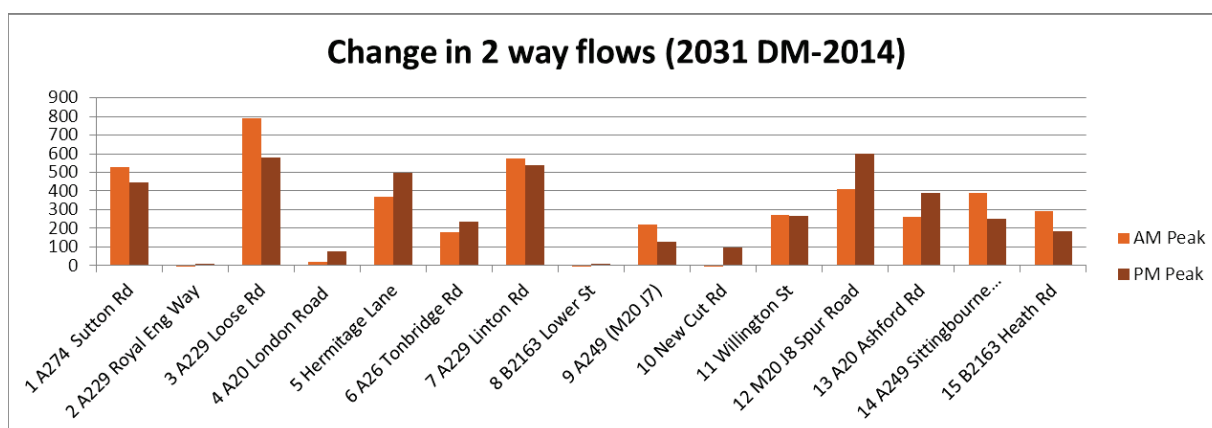


Figure 7.3 shows the change in the volume of traffic compared with the 2014 baseline. Some of the most significant increases in the volume of traffic are shown to be on the A274 Sutton Road, A229 Loose Road and A229 Linton Road (Figure 7.3).

Figure 7.3: 2031 DM - Change in Two-way Flows from 2014 (vehs)



7.6 Travel Times

The additional demand on the 2031 DM network results in a general increase in journey times on the radial routes compared with the 2014 model. The impact is greater in the AM peak than the PM peak with the largest increase being greater than 3.5 minutes on the A229 Loose Road (inbound). The increase in travel time on the A274 Sutton Road and A229 Loose Road reflects the increase in traffic demand on these routes.

Figure 7.4: AM Peak - 2014 and 2031 DM Inbound Travel Times

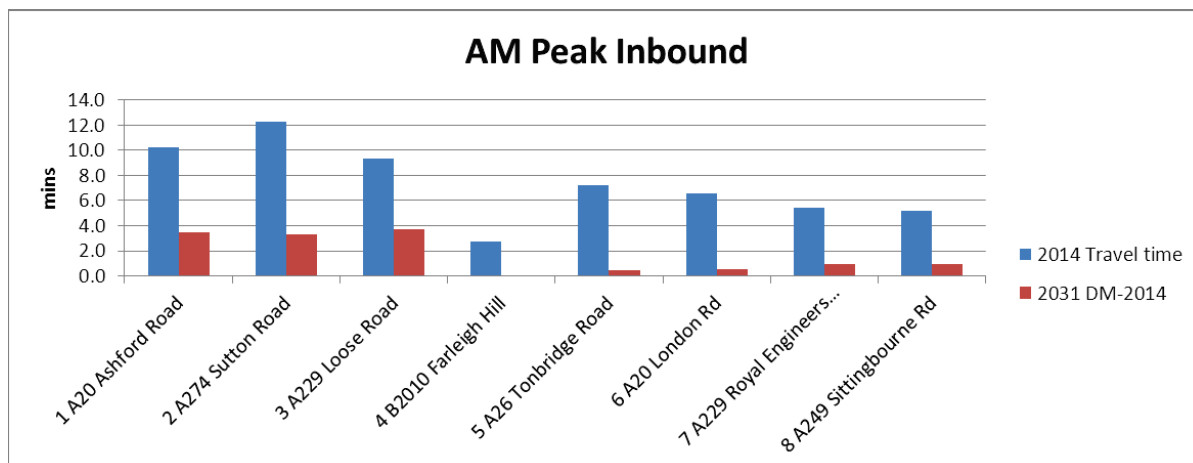


Figure 7.5: AM Peak - 2014 and 2031 DM Outbound Travel Times

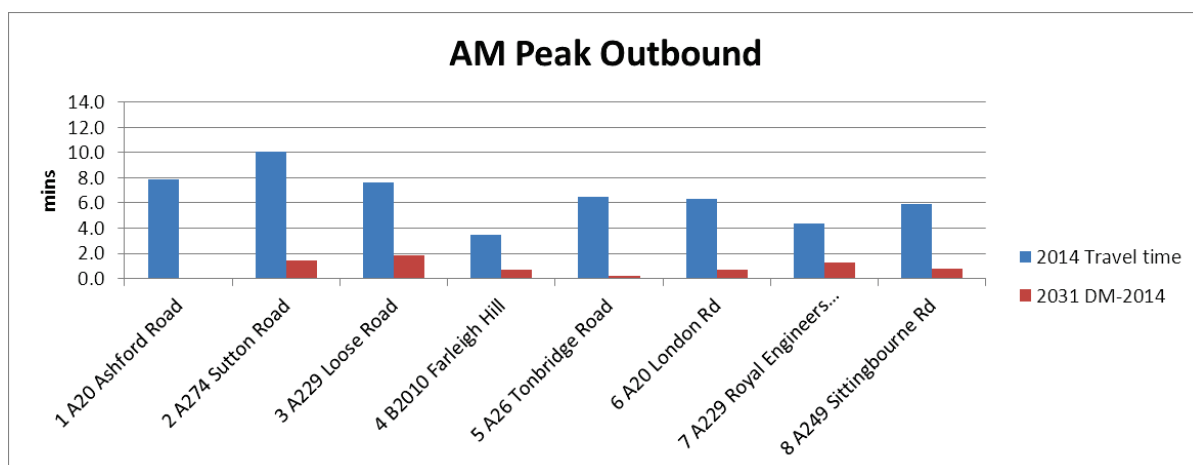


Figure 7.6: PM Peak - 2014 and 2031 DM Inbound Travel Times

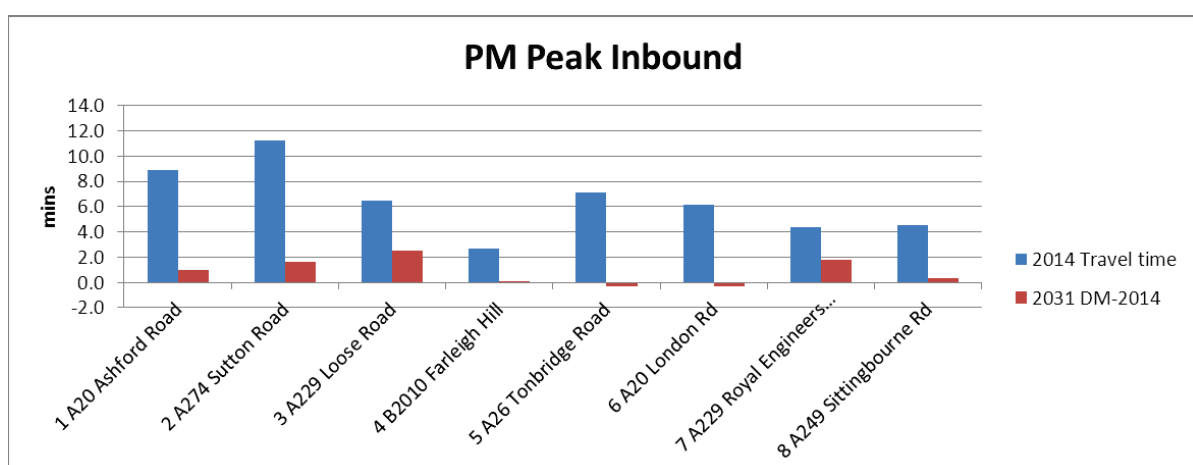
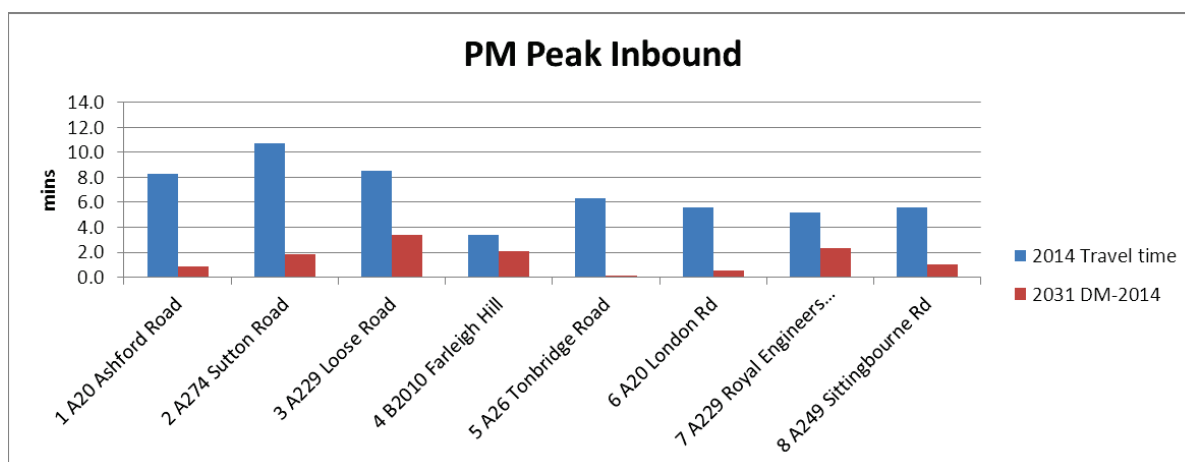


Figure 7.7: PM Peak - 2014 and 2031 DM Inbound Travel Times



7.7 Summary of Model Performance

The increase in travel demand from 2014 to the 2031 DM model is reflected in increases to link flows and travel times on most of the radial routes. The 2031 DM model includes the improvements brought about by the Bridges Gyratory scheme which will have an impact on movements around the town centre. However the additional demand arising from the forecast development will have a significant impact across the town.

With no demand management or other transport infrastructure improvements there would clearly be excessive demand on the A229, A274 to the south and east, A249, A20 to north and east and to Hermitage Lane to the west during the AM and PM peaks.

There is minimal change in the mode choice as there is no significant change to public transport or car travel costs.

8 2031 Do something 1 Model

8.1 Summary Description

The 2031 Do something 1 (2031 DS1) model is essentially based on highway infrastructure changes, including the Bridges Gyratory link, junction improvements at various locations and also the Leeds/Langley Bypass to the east of the town. The travel demand within the model is the same as for the 2031 DM model.

The model has been assessed using the 2031 DM model as a benchmark.

8.2 2031 Do Something 1 Model Assumptions

Bridges Gyratory

The transport improvements included in the 2031 DS1 model include the Bridges Gyratory scheme as modelled in the 20131 DM and 2031 DS2 models.

Junction Improvements

The 2031 DS1 model includes junction improvements at A20/Coldharbour Lane, A249/Bearsted Rd, Bearsted Rd/New Cut, A20/Willington St, A229/ A274 Wheatsheaf, A274/Willington St, A274/Wallis Ave and A26/Fountain Lane.

The improvements to junction configuration and to signal arrangements are based on drawings and details provided, where available.

Leeds/Langley Bypass

A major feature of the network changes for the 2031 DS1 model is the inclusion of the Leeds / Langley bypass. This new route between the A20 and A274 provides an alternative route to the east of the town. The modelled scheme is based on limited information available regarding assumptions around the junction arrangements and associated improvements to the A274. The transport interventions are listed in Table 8-1 below.

Table 8-1: 2031 DS1 Transport Interventions Summary

Transport Improvement	Description
Bridges Gyratory	New northbound link to bypass the gyratory
A20 / Coldharbour Lane Junction	Junction Capacity and signals – no change to M20 J5
A249 / Bearsted Rd roundabout	Junction improvements
Bearsted Rd / New Cut junction	Junction improvements
Dual carriageway between A249 and New Cut junctions	Increased capacity and junction arrangement
A20 Ashford Road / Willington Street	Junction capacity and signals arrangement
A229 / A274 Wheatsheaf Junction	Close exit to Cranbourne Avenue
A274 / Willington Street Junctions	Junction capacity improvements
A274 / Wallis Avenue Junction	Junction capacity improvements
A26 Fountain Lane Junction	Changes to accommodate right turn vehicles within the junction
Leeds Langley Relief Road	New route linking the A274 and the A20 and including improvements to the A274. Single carriageway with roundabouts at each end and replacing the 5 Wents junction. Existing B2163 closed south of Horseshoes Lane

8.3 Travel Demand

The forecast development quantum is the same for 2031 DM and the 2031 DS1 model. The 2031 DS1 model includes no change to the assumptions around sustainable modes of transport or to car occupancy which could influence the level of travel demand modelled.

The 2031 DS1 model highway interventions have an impact on vehicle travel distance and time. The reduced travel time on the highway network attracts a small increase of <1% in car trips (Table 8-2) compared with the 2031 DM. There is a corresponding small shift in the mode share in the AM peak (Table 8-3).

There is a small increase in the number of the AM peak hour park and ride cars to 286 vehicles, which account for <1% of all car movements.

Table 8-2: 2031 DS1 Travel Demand (Vehicle Trips)

	AM Peak			PM Peak		
	2014	2031 DM	2031 DS1	2014	2031 DM	2031 DS1
All vehicles	35500	41500	41600	32,000	38000	38100
% diff from 2014		17%	17%		19%	19%
% diff from 2031 DM			0.2%			0.2%

Table 8-3: 2031 DS1 Modal Split

Person Trips	AM Peak		PM Peak	
	2031 DM	2031 DS1	2031 DM	2031 DS1
Car (all purposes)	81%	82%	84%	84%
Bus trips	11%	10%	8%	8%
Rail trips	8%	8%	8%	8%

8.4 Network Performance

The 2031 DS1 model includes more than 4km of additional highway for the Leeds/Langley Bypass. However both the AM and PM peak models have a similar total travel distance to the 2031 DM model, but with a reduced total travel time on the network. This suggests that the network operates more efficiently than the 2031 Do Minimum scenario.

Table 8-4: 2031 DS1 Network Performance Summary (AM Peak)

AM Model	2031 DM	2031 DS	% change from 2031 DM
Total Travel Distance (veh km)	144500	146700	2%
Total Travel Time (veh hrs)	11400	10800	-6%
Average Vehicle Speed (kph)	13	14	

Table 8-5: 2031 DS1 Network Performance Summary (PM Peak)

PM Model	2031 DM	2031 DS	% change from 2031 DM
Total Travel Distance (veh km)	137500	140200	2%
Total Travel Time (veh hrs)	10000	9500	-5%
Average Vehicle Speed (kph)	14	15	

8.5 Link Flows

The 2031 DM model and the 2031 DS1 model have the same level of traffic demand on the network. However the 2031 DS1 model includes improvements at key junctions and also additional road space in the form of the Leeds/Langley bypass.

Figure 8.1 and Figure 8.2 compare the 2031 DM and 2031 DS1 two way traffic flows at the locations indicated in Figure 5.1. The 2031 DS1 highway improvements appear to have a limited impact on the two way traffic volumes on A20 London Road, Hermitage Lane, A26 Tonbridge Road and A26 Linton Road.

Figure 8.1: 2031 DM & DS1 - AM Peak Two-way Flow

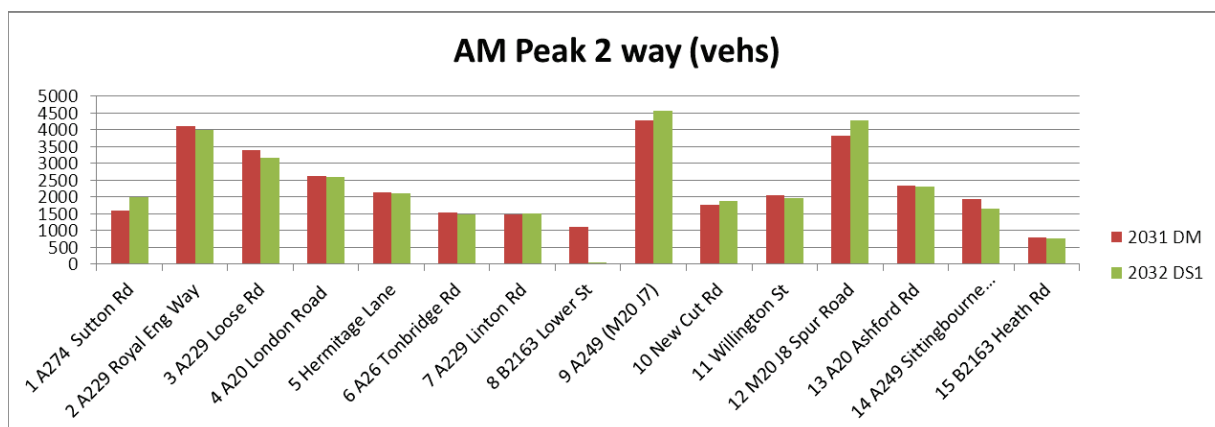
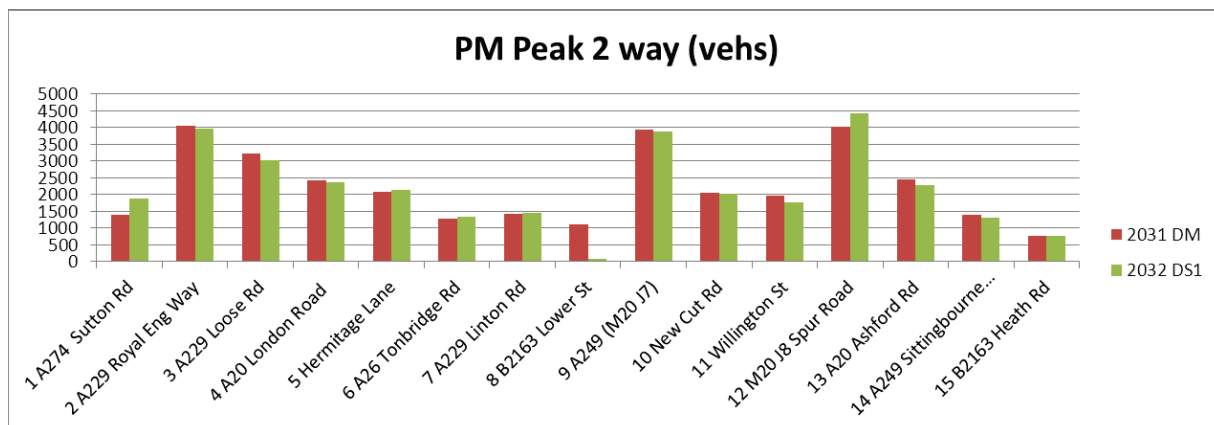


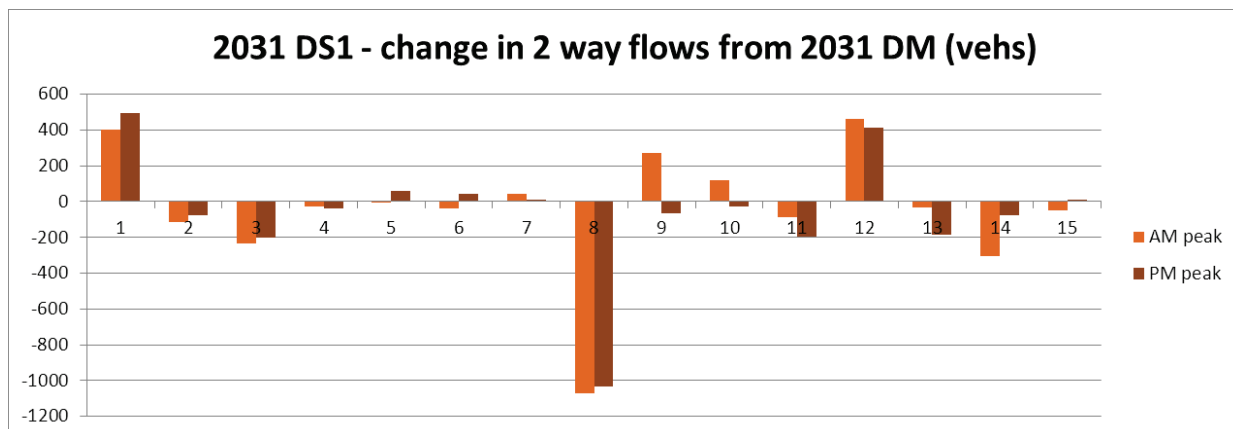
Figure 8.2: 2031 DM & DS1 - PM Peak Two-way Flow



As might be expected the inclusion of the Leeds/Langley bypass appears to have an impact on routes to the east and north of the town. Figure 8.3 shows the difference in the 2031 DM and 2031 DS1 two way flows.

There is an increase in traffic using the A249 and A20 approaches to the M20 at junctions 7 and 8 respectively. The B2163 Heath Road is effectively closed to through traffic. The A274 Sutton Road indicates an increase in flow as traffic reroutes to access the new link. There is a small decrease in traffic using Willington Street.

Figure 8.3: 2031 DS1 - Change in Two Way Flows from 2031 DM (vehs)



8.6 Travel Times

The 2031 DS1 model includes improvements at key junctions across the town as well as a significant addition to the highway provision in the form of the Leeds/Langley bypass. The net impact of these changes on travel times on selected routes are summarised in Figure 8.4 to Figure 8.7.

The 2031 DS1 models demonstrate a small reduction in travel times compared to the 2031 DM scenario for most of the selected routes; apart from the A20 London Road and A249 Sittingbourne Road inbound in the PM peak.

The A20, A274 and A229 Loose Rd routes probably benefit most from the inclusion of the Leeds / Langley Bypass, in the AM in particular. The journey times on these routes in the AM peak are over 1 minute shorter than for the 2031 DM model.

Figure 8.4: 2031 DM & DS - AM Peak Inbound Travel Times

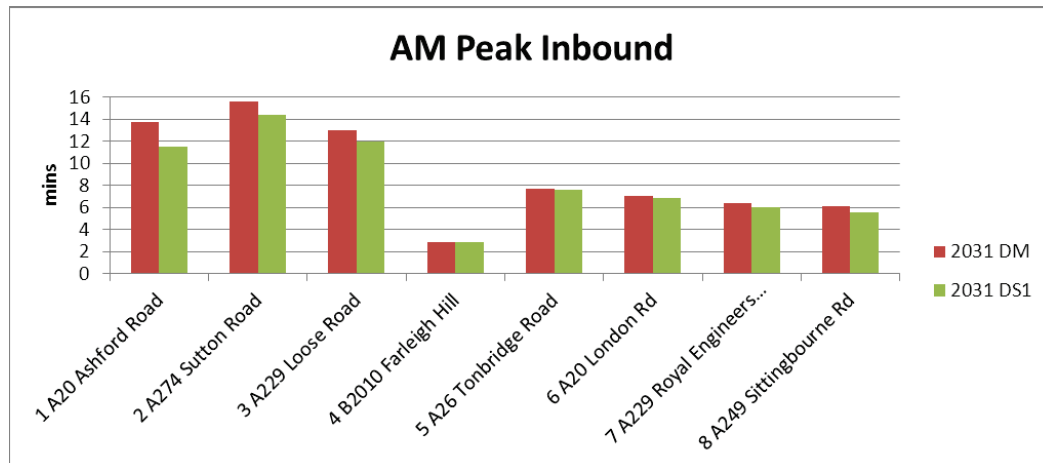


Figure 8.5: 2031 DM & DS - AM Peak Outbound Travel Times

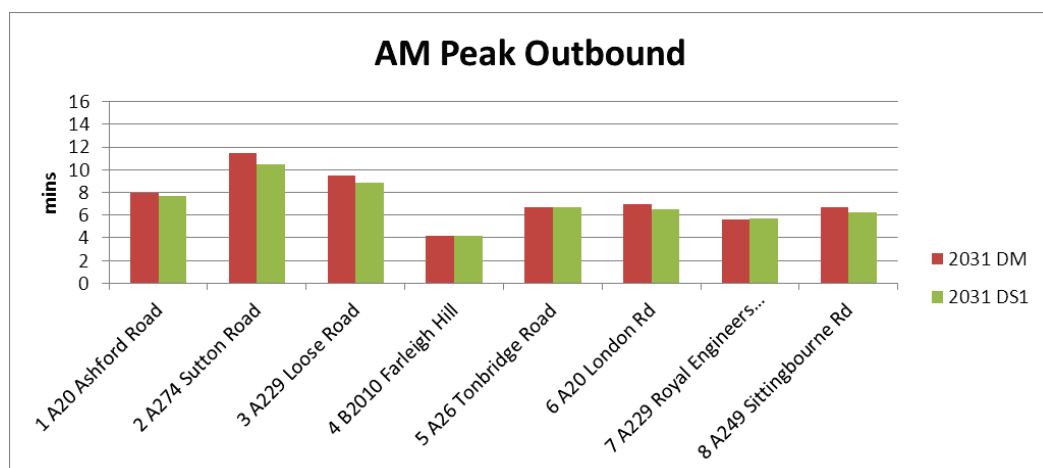


Figure 8.6: 2031 DM & DS PM - Peak Inbound Travel Times

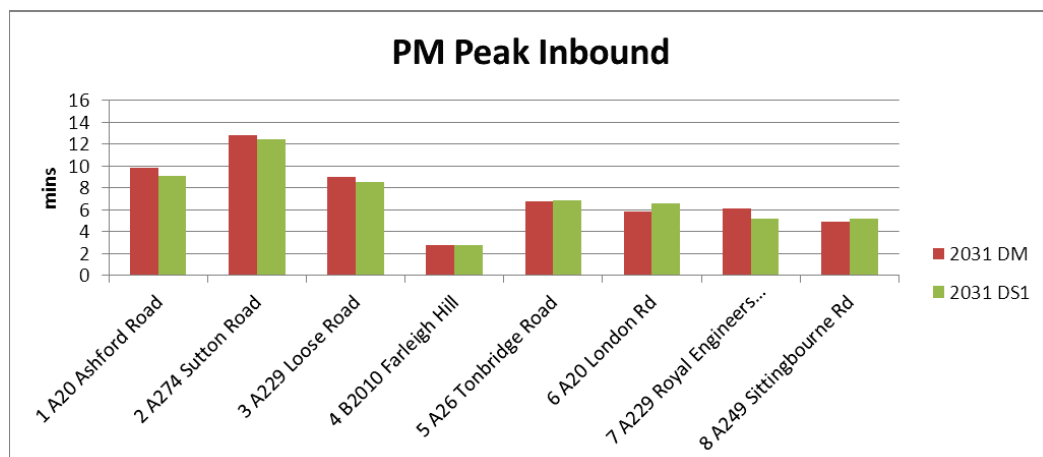
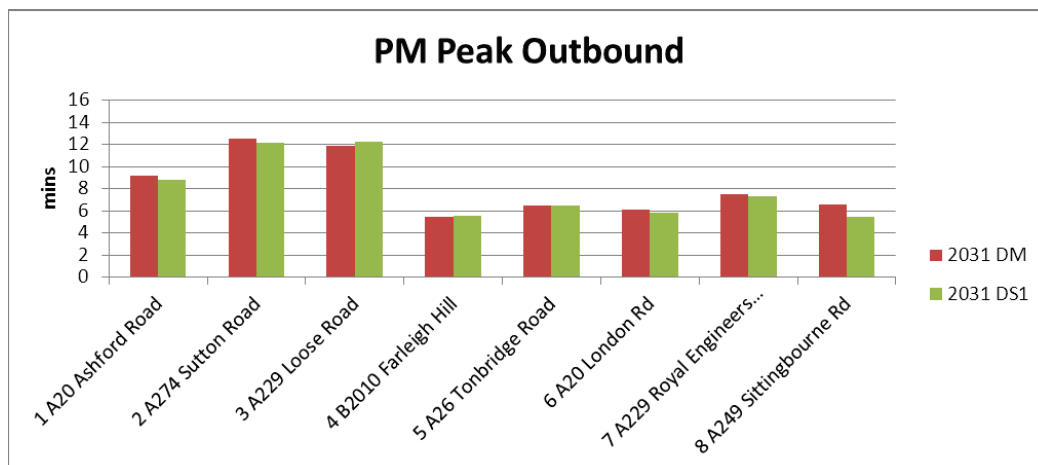


Figure 8.7: 2031 DM & DS - PM Peak Outbound Travel Times



8.7 Summary of Model Performance

The most significant change to the network, with the inclusion of the Leeds/Langley Bypass, clearly reduces traffic on the B2163. The link offers a longer but faster route for an element of traffic from the south and east of the town. This is reflected in the lower total travel time while the total travel distance remains similar to the 2031 DM model.

The bypass attracts traffic to access the M20 via the spur road at junction 8 where flows increase. The A20 Ashford Rd, A274 Sutton Rd and A229 Loose Rd corridors all benefit from reduced travel times; especially in the AM peak. This is likely due to the combined impact of the Leeds/Langley Bypass and key junction improvements.

The key junction improvements across the town contribute to the small reductions in travel times on the key radial routes in/out of the town.

9 2031 Do Something 2

9.1 Summary Description

The 2031 Do something 2 (2031 DS2) model is based on the Integrated Transport Strategy Action Plan, as provided by Maidstone Borough Council. The measures in the ITS Action Plan that can be reflected in the model include junction improvements, network improvements, public transport changes, changes to walking and cycling mode share; and car occupancy.

The 2031 DS2 model includes the same forecast development assumptions as the 2031 DM and 2031 DS1 models. The 2031 DM model has been used as a benchmark against which to assess the performance of the 2031 DS2 model.

9.2 2031 Do Something 2 Model Assumptions

Table 9-1: 2031 DS2 Transport Interventions Summary

Transport Improvement	Description
Bridges Gyratory	New northbound link to bypass the gyratory
A20 / Coldharbour Lane Junction	Junction Capacity and signals – no change to M20 J5
A249 / Bearsted Rd roundabout	Junction improvements
Bearsted Rd / New Cut junction	Junction improvements
Dual carriageway between A249 and New Cut junctions	Increased capacity and junction arrangement
A20 Ashford Road / Willington Street	Junction capacity and signals arrangement
A229 / A274 Wheatsheaf Junction	Close exit to Cranbourne Avenue
A274 / Willington Street Junctions	Junction capacity improvements
A274 / Wallis Avenue Junction	Junction capacity improvements
A26 Fountain Lane Junction	Changes to accommodate right turn vehicles within the junction
PR Fare	£3.00 Park and Ride parking cost
New PR service from Linton corner	New service with 15 minute frequency assumed
Existing PR bus services	15 minute frequency assumed for existing PR
M20 Junction 7 improvement	Signals on M20 eastbound approach and A249 approaches to the roundabout
New Cut / A20 left turn slip	Junction expansion to include left hand turn slip with give way at A20 (to allow for bus priority right hand turn lane). NB Bus priority not modelled.

Transport Improvement	Description
Hermitage Lane pedestrian signals	New pedestrian signals near vehicle access to Barming Station
New link between Gore Court Rd and Bicknor Wood	New link with priority junctions assumed at each end
Widening of Gore Court Road	Increased capacity on Gore Court Rd
Car parking charges	50% increase in parking charges
Notcutts shuttle bus	New shuttle bus route from Notcutts to the bus station with 20 minute frequency
Bus services	Bus services on main radial routes increased to 7 minute frequencies
Car sharing	Increase in car sharing by 5%.
Romney Place bus lane	Bus only lane from Lower Stone Street to Romney Place
Walking mode share	Mode share target - 8.5% increase in walking mode share over 2014 base
Cycling mode share	Mode share target - 8.5% increase in cycling mode share over 2014 base
Circular bus route to hospital	Linking town centre, Hermitage Lane, the hospital, Howard Drive (via a bus only link) and London Rd

Bridges Gyratory

The Bridges gyratory as included as modelled in the 2031 DM and 2031 DS1 models.

Highway Improvements

The 2031 DS2 model include the same junction improvements as the 2031 DS1 model at A20/Coldharbour Lane, A249/Bearsted Rd, Bearsted Rd/New Cut, A20/Willington St, A229/ A274 Wheatsheaf, A274/Willington St, A274/Wallis Ave and A26/Fountain Lane.

In addition improvements are also included for M20 J7 and for A20/New Cut. Proposed junction configuration and signal arrangements are based on drawings and details provided, where possible.

The 2031 DS2 also includes a new link between Gore Court Rd and the A274 and a bus only link from Lower Stone Street to Romney Place.

Bus Services

A number of improvements to bus services have been identified including:

- an increase service frequency of 7 minutes on the main radial routes;

- a new shuttle service to Notcutts; and
- a circular service linking Hermitage Lane, the hospital, Howard Drive and the A20. This includes a bus only link to Howard Drive.

In addition, a new Park & Ride service is provided at Linton Corner and the frequency of Park & Ride bus services to all sites increased to 15 minute intervals.

A complex matrix of services operates on the key corridors providing a variety of alternative route options and bus frequencies. To achieve the proposed 7 minute frequency on the main radial routes over a 3 hour peak period requires a total of 26 buses. The A274, A20(W) and A26 corridors are all currently served by services with sufficient frequency to provide enough buses.

Additional buses were added to the services operating along the A229(S), A229(N) and A20(E) corridors to achieve the target frequency. A total of 65 buses over the 3 hour peak period were added to the AM model and 56 to the PM model.

The Notcutts shuttle bus operates every 20 minutes and runs along New Cut Road and along the A20 to the bus station via King Street. This service stops only at Notcutts and the bus station.

The circular service linking Hermitage Lane and Howards Drive operates via a new bus only link and is an extension of the 79 bus route. This bus operates on a 15 minute frequency and stops at all the stops on route as well as on Howards Drive.

The new Park & Ride service from Linton Corner operates along the A220 Loose Road, approaching the town centre via Mill Street. This service is assumed to stop at the proposed Linton Corner Park & Ride site, Mill Street, High Street and Kings Street.

The addition of bus services within the model takes no account of the practicality of their provision or capacity available for additional buses within the town.

Park and Ride

The park and ride sub-mode choice model estimates the number of cars that might be expected to switch to park and ride based on travel time and cost. The park and ride journey includes a parking or fare cost which for the 2014, 2031 DM and 2031 DS1 models is £2.50 per vehicle. For the 2031 DS2 model it is proposed that cars using the park and ride service should pay to park the car and travel on the bus for free. A parking charge of £3.00 is proposed.

Car Parking Charges

A 50% increase in car parking charges is proposed for public long and short stay parking. Representative car parking costs per zone are used within the model for the mode choice process. These costs were uplifted by 50% to represent the aspired increase in public parking charges.

Walking and Cycling Mode Share

The ITS action plan has the objective of increasing the number of walking and cycling trips. The aspiration is for an 8.5% increase in the cycling mode share over the 2014 base, representing a 0.5% increase per year to 2031. A similar increase is envisaged for the walking mode share.

The Maidstone Model is essentially a highway model with a mode choice option to estimate the potential transfer of trips between car, bus or rail. The model does not include walking and cycling modes of travel.

The most appropriate way to reflect the anticipated increase in walking and cycling in the Maidstone model is to reduce the number of trips assigned within the model to car travel. This approach requires an interpretation of a '% increase in walking and cycling trips' into a reasonable adjustment of car trips that are modelled.

Walking and cycling trips, as part of the wider sustainable modes, have been the subject of various studies into the possibility of reducing the number of car trips. A wide range of estimates have been produced to describe the potential to change the way in which people choose to travel under different circumstances.

A study for the Depart for Transport (DfT)¹ reported estimates for a potential reduction in car trips from 5% to 21% in the urban peak hour, depending on the transport interventions employed

A study of the impact of sustainable transport interventions in Darlington, Peterborough and Worcester reported a decrease in car trips of 9% in response to a range of measures employed.²

¹ Cairns, S., Sloman, L., Newson, C., Anable, J., & Goodwin, P. 2004. 'Smarter Choices – Changing the way we travel'.

Some care is needed in the interpretation of the outcomes of the different studies as the estimated reduction in car trips is the outcome of measures related to all sustainable modes of travel and not directly related to specific changes in walking and cycling provision only. Guidance in DfT Tag Unit M5.2 suggests establishing a benchmark for car trip reduction using target values as a starting point.

In the absence of detailed information on the existing levels of walking and cycling in Maidstone for different purposes, a relatively simplistic approach to this complex issue has been agreed with MBC/KCC and adopted, based on broad assumptions about the impact of a sustainable travel strategy. As a proxy for the aspired increase in walking and cycling trips the 2031 home based car trips have been adjusted down based on achieving 25% of the target values.

The adjustment was applied only to home based work and home based other highway trips with an origin and destination within the Maidstone urban area zones and no consideration to trip distance was applied.

The net result is a reduction of 1395 (3.5%) vehicle trips in the AM peak and 1351 (3.5%) vehicle trips in the PM peak.

9.3 Car Sharing

An increase in car sharing of 5% by 2031 is proposed.

Car sharing is reflected in the model by the level of average car occupancy assumed which originally set at 1.23 within the model. The car occupancy assumed for the DS2 model is 1.29. This value has been used in the trip generation assumptions for forecast development and in the conversion of vehicle trips to person trips for the mode choice process.

The net impact of the increase in car occupancy is a reduction of 228 (0.5%) vehicle trips in the AM peak.

² Sloman, L., Cairns, S., Newson, C., Anable, J., Pridmore, A. & Goodwin, P. 2010. 'The Effects of Smarter Choice Programmes in the Sustainable Travel Towns: Summary Report (Report to the DfT, February 2010)

9.4 Travel Demand

The total travel demand, in person trips, by highway and public transport is summarised in Table 9-2 below. The total travel demand included in the 2031 DS2 model, in person trips, decreases by around 4% compared with the 2031 DM model, reflecting the increase in the proportion of walk and cycle trips and the increase in car occupancy allowed for in the transport interventions.

Table 9-2: 2031 DS2 Travel Demand (Person Trips)

	AM Peak			PM Peak		
	2014	2031 DM	2031 DS2	2014	2031 DM	2031 DS2
All person trips	50300	58600	56600	44900	52800	50800
% diff from 2014		17%	12%		18%	13%
% diff from 2031 DM			-4%			-4%

The total travel demand, in vehicle trips, decreases by 9% in the AM peak and 8% in the PM peak (Table 9-3) in the 2031 DS2 model. The decrease in vehicle trips is the net outcome of the impact of the decrease in total demand, increase in vehicle occupancy and the enhanced public transport provision. The increase in bus frequencies and the new bus services, together with the increased cost of parking, promotes a shift in the mode share toward public transport and to buses in particular (Table 9-4).

Table 9-3: 2031 DS2 Travel Demand (Vehicle Trips)

	AM Peak			PM Peak		
	2014	2031 DM	2031 DS2	2014	2031 DM	2031 DS2
All vehicles	35500	41500	37700	32,000	38000	34800
% diff from 2014		17%	6%		19%	9%
% diff from 2031 DM			-9%			-8%

Table 9-4: 2031 DS2 Modal Split

Person Trips	AM Peak		PM Peak	
	2031 DM	2031 DS2	2031 DM	2031 DS2
Car (all purposes)	81%	75%	84%	80%
Bus	11%	15%	8%	11%
Rail	8%	10%	8%	9%

As a result of the additional park and ride site at Linton Corner and changes to bus frequencies there is a significant increase in the number of peak hour park and ride cars in the AM peak to 1290 vehicles, which account for around 4% of all car movements (Table 9-5).

Table 9-5: Park and Ride Car Trips

AM Peak	2031 DM	2031 DS1	2031 DS2
Park and ride cars	276	286	1290
P&R as % of all cars	<1%	<1%	4%

9.5 Network Performance

The 2031 DS2 model includes a wide range of transport interventions from highway capacity improvements to sustainable transport measures. Both the AM and PM peak models show a significant reduction in the total travel distance and total travel time compared with the 2031 DM model. This suggests that there would be a significant improvement in network efficiency compared with the 2031 Do Minimum scenario if all of the proposed transport interventions could be successfully implemented.

Table 9-6: 2031 DS2 Network Performance Summary (AM Peak)

AM Model	2031 DM	2031 DS2	% change from 2031 DM
Total Travel Distance (veh km)	144500	126900	-12%
Total Travel Time (veh hrs)	11400	8500	-26%
Average Vehicle Speed (kph)	13	15	

Table 9-7: 2031 DS2 Network Performance Summary (PM Peak)

PM Model	2031 DM	2031 DS2	% change from 2031 DM
Total Travel Distance (veh km)	137500	125700	-9%
Total Travel Time (veh hrs)	10000	8100	-19%
Average Vehicle Speed (kph)	14	16	

9.6 Link Flows

The reduction in travel demand assigned to the network for the 2031 DS2 is reflected in lower vehicle flows at many of the locations selected, in both peaks (Figure 9.1 and Figure 9.2).

Figure 9.1: 2031 DM & DS2 - AM Peak Two-way Flow

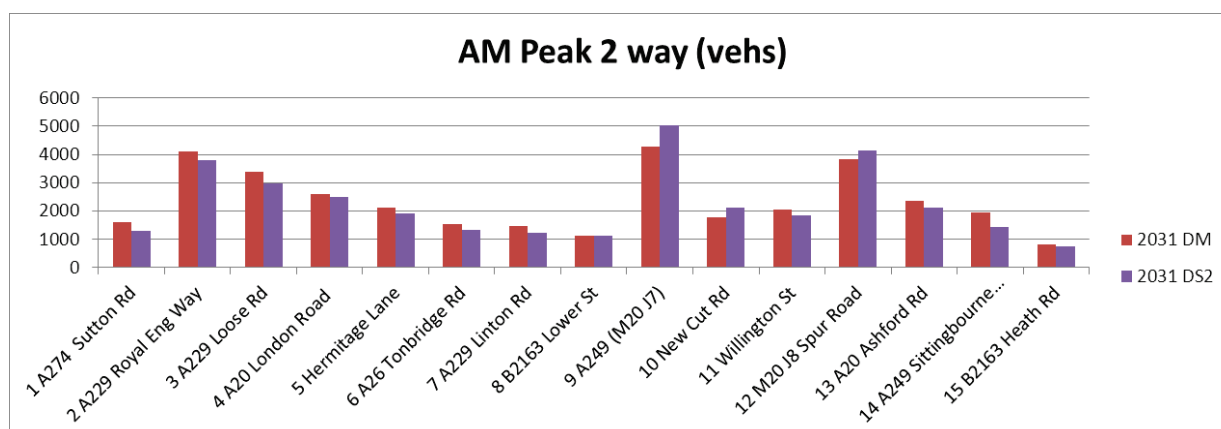
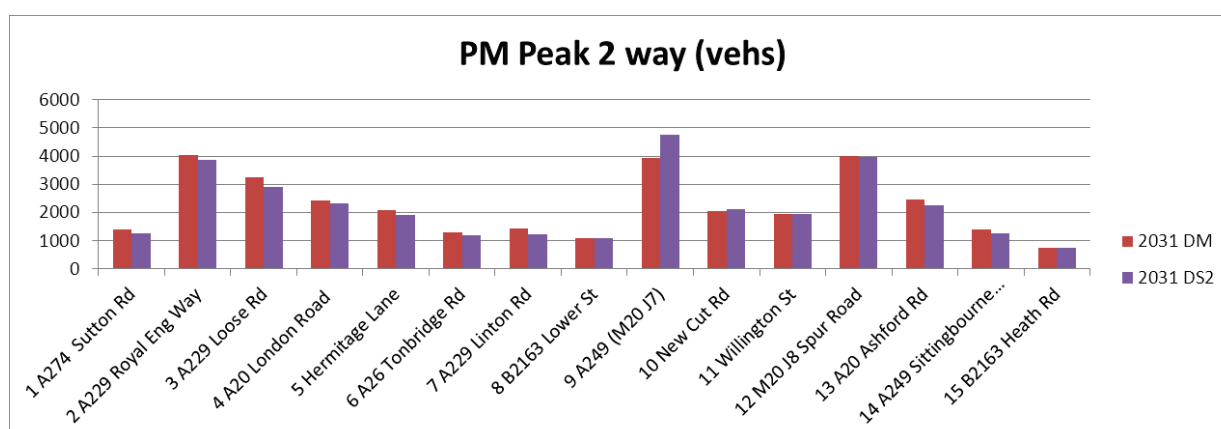
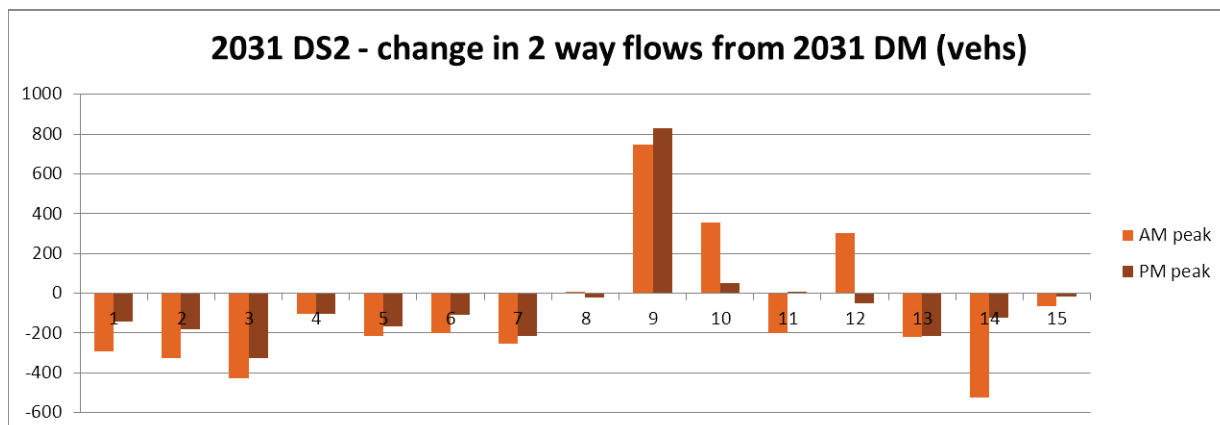


Figure 9.2: 2031 DM & DS2 - PM Peak Two-way Flow



However, despite the lower overall vehicle demand, the link flows in the AM peak in particular show a significant increase on the A249 approach to M20 J7, M20 J8 Spur Road and New Cut compared to the 2031 DM (Figure 9.3).

Figure 9.3: 2031 DS2 – Change in Two Way Flows from 2031 DM (vehs)



9.7 Travel Times

With the lower travel demand for the 2031 DS2 model the travel times on most of the radial routes are lower than for the 2031 DM model. The A274, A20 Ashford Road and A229 Loose Road inbound movements benefit most in the AM peak (Figure 9.4 to Figure 9.7).

The modelled changes have a different impact on the AM and PM networks. This is a consequence of the change in levels of pressure on sections of the networks and the different composition of traffic and traffic movements in the AM and PM peaks.

Figure 9.4: 2031 DS2 Journey Times – AM Peak Inbound

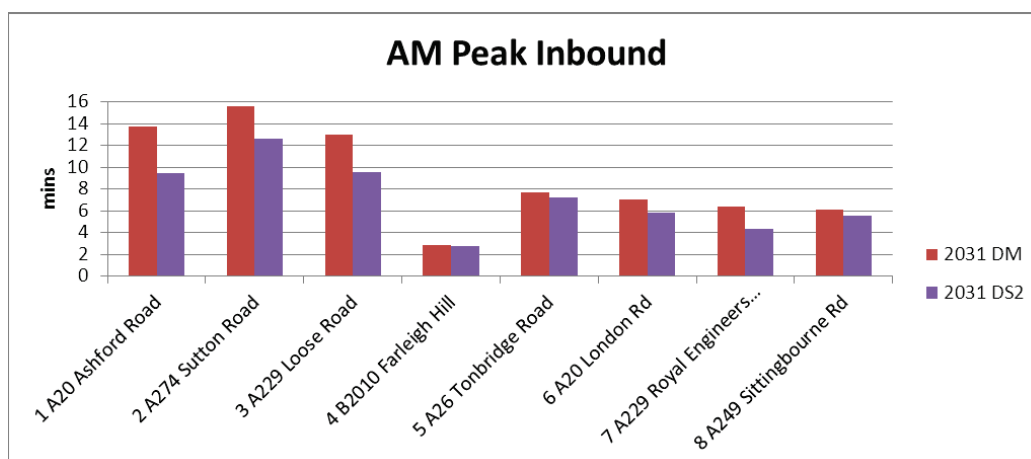


Figure 9.5: 2031 DS2 Journey Times – AM Peak Outbound

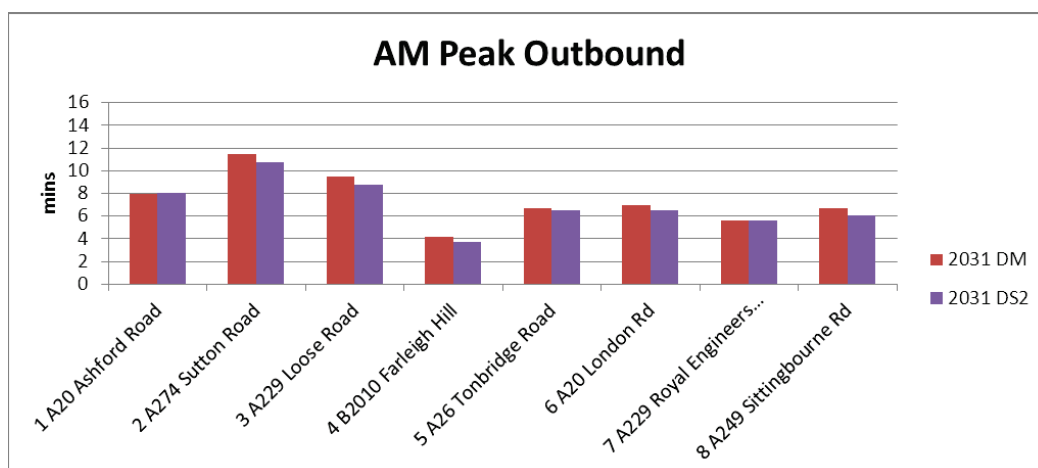


Figure 9.6: 2031 DS2 Journey Times – PM Peak Inbound

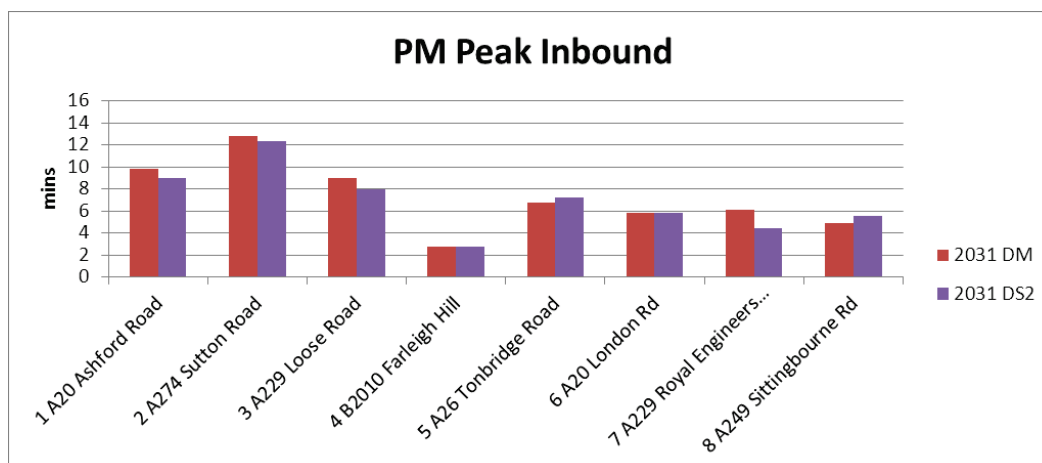
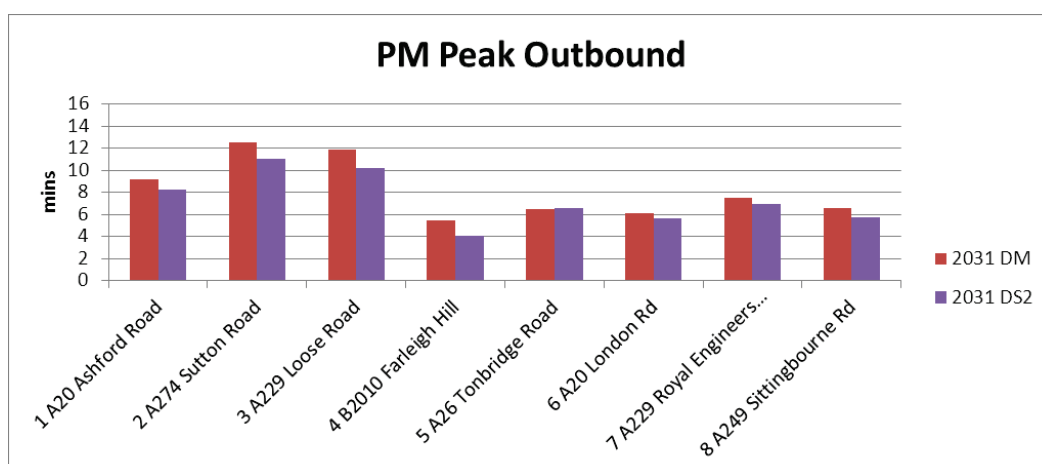


Figure 9.7: 2031 DS2 Journey Times – PM Peak Outbound



9.8 Summary of Model Performance

The 2031 DS2 has a significantly reduced travel demand compared with the 2031 DM and 2031 DS1 models. This is the outcome of assumptions around walking and cycling modes and car occupancy as well as an additional Park & Ride site, a very high level of public transport provision and a significant increase in parking costs.

In addition the model includes improvements to key junctions across the town which would be expected to improve the efficiency of the network. The model outcomes are a reflection of a package of highway, public transport and policy changes.

The net impact is a general reduction in traffic flows compared with the 2031 DM, although there are some parts of the network showing an increase in vehicle movements. Travel times on the radial routes are generally shorter for the 2031 DS2 models although again there are one or two routes where times increase.

10 Overview of Forecast Models

10.1 Model Inputs

Forecast Development Data

The model inputs in terms of the forecast quantum of development in 2031 have been kept constant throughout the modelled scenarios.

Transport Interventions

A summary of the various transport interventions incorporated into each of the forecast model scenarios is provided in Table 10-1 below.

Table 10-1: Summary of Transport Interventions

Transport Improvement	Description	2031 DM	2031 DS1	2031 DS2
Bridges Gyratory	New northbound link to bypass the gyratory	Yes	Yes	Yes
A20 / Coldharbour Lane Junction	Junction Capacity and signals – no change to M20 J5		Yes	Yes
A249 / Bearsted Rd roundabout	Junction improvements		Yes	Yes
Bearsted Rd / New Cut junction	Junction improvements		Yes	Yes
Dual carriageway between A249 and New Cut junctions	Increased capacity and junction arrangement		Yes	Yes
A20 Ashford Road / Willington Street	Junction capacity and signals arrangement		Yes	Yes
A229 / A274 Wheatsheaf Junction	Close exit to Cranbourne Avenue		Yes	Yes
A274 / Willington Street Junctions	Junction capacity improvements		Yes	Yes
A274 / Wallis Avenue Junction	Junction capacity improvements		Yes	Yes
A26 Fountain Lane Junction	Changes to accommodate right turn vehicles within the junction		Yes	Yes

Transport Improvement	Description	2031 DM	2031 DS1	2031 DS2
Leeds Langley Relief Road	New route linking the A274 and the A20 and including improvements to the A274. Single carriageway with roundabouts at each end and replacing the 5 Wents junction. Existing B2163 closed south of Horseshoes Lane		Yes	
PR Fare	£3.00 Park and Ride parking cost			Yes
New PR service from Linton corner	New service with 15 minute frequency assumed			Yes
Existing PR bus services	15 minute frequency assumed for existing PR			Yes
M20 Junction 7 improvement	Signals on M20 eastbound approach and A249 approaches to the roundabout			Yes
New Cut / A20 left turn slip	Junction expansion to include left hand turn slip with give way at A20 (to allow for bus priority right hand turn lane). NB Bus priority not modelled.			Yes
Hermitage Lane pedestrian signals	New pedestrian signals near vehicle access to Barming Station			Yes
New link between Gore Court Rd and Bicknor Wood	New link with priority junctions assumed at each end			Yes
Widening of Gore Court Road	Increased capacity on Gore Court Rd			Yes
Car parking charges	50% increase in parking charges			Yes
Notcutts shuttle bus	New shuttle bus route from Notcutts to the bus station with 20 minute frequency			Yes
Bus services	Bus services on main radial routes increased to 7 minute frequencies			Yes
Car sharing	Increase in car sharing by 5%.			Yes

Transport Improvement	Description	2031 DM	2031 DS1	2031 DS2
Romney Place bus lane	Bus only lane from Lower Stone Street to Romney Place			Yes
Walking mode share	Mode share target - 8.5% increase in walking mode share over 2014 base			Yes
Cycling Mode Share	Mode share target - 8.5% increase in walking mode share over 2014 base			Yes
Circular bus route to hospital	Linking town centre, Hermitage Lane, hospital, Howard Drive and London Rd			Yes

10.2 Travel Demand

The AM and PM peak travel demand by all modelled modes and purposes is summarised in Table 10-2 below. The 2031 Do Minimum models indicate an increase of 17- 18% in person trips compared with the 2014 AM and PM respectively. The total person trips remain the same for the 2031 DM and 2031 DS1 models.

The 2031 DS2 models incorporate changes to assumptions around the walking and cycling mode share. Consequently the travel demand in person trips is reduced by approximately 4% compared with the 2031 DM and 2031 DS1.

Table 10-2: Summary of Total Travel Demand (Person Trips)

Person Trips	2014	2031 DM	2031 DS1	2031 DS2
AM Peak	50300	58600	58600	56600
% difference from 2014		17%	17%	12%
% difference from 2031 DM			0%	-4%
PM Peak	44900	52800	52800	50800
% difference from 2014		18%	18%	13%
% difference from 2031 DM			0%	-4%

Vehicle demand on the network in the 2031 DM models increases by 17-19% compared with the 2014 models (Table 10-3). This amounts to approximately 6000 additional vehicle trips on the highway network.

Highway changes incorporated into the 2031 DS1 models attract a small number of trips from public transport resulting in increase of <1% in the total vehicle trips compared with the 2031 DM models. This is also reflected in a slight change in the mode share (Table 10-4).

Table 10-3: Summary of Total Travel Demand (Vehicle Trips)

Vehicle Trips	2014	2031 DM	2031 DS	2031 DS2
AM Peak	35500	41500	41600	37700
% difference from 2014		17%	17%	6%
% difference from 2031 DM			<1%	-9%
PM Peak	32,000	38000	38100	34800
% difference from 2014		19%	19%	9%
% difference from 2031 DM			<1%	-8%

The transport interventions included in the 2031 DS2 model are focussed on public transport provisions together with car parking policy etc. The net impact of the reduced person trips, increase in car occupancy and transport interventions is a much smaller increase in vehicle demand from 2014 of 6-9% (2200 to 2800 vehicles) in the AM and PM peaks respectively, significantly lower than for 2031 DS1. This again is reflected in a decrease in the mode share for cars and an increase in trips by public transport.

Table 10-4: Summary of Modal Splits

Person Trips	AM Peak			PM Peak		
	2031 DM	2031 DS1	2031 DS2	2031 DM	2031 DS1	2031 DS2
Cars (all purposes)	81%	82%	75%	84%	84%	79%
Bus	11%	10%	15%	8%	8%	11%
Rail	8%	8%	10%	8%	8%	10%

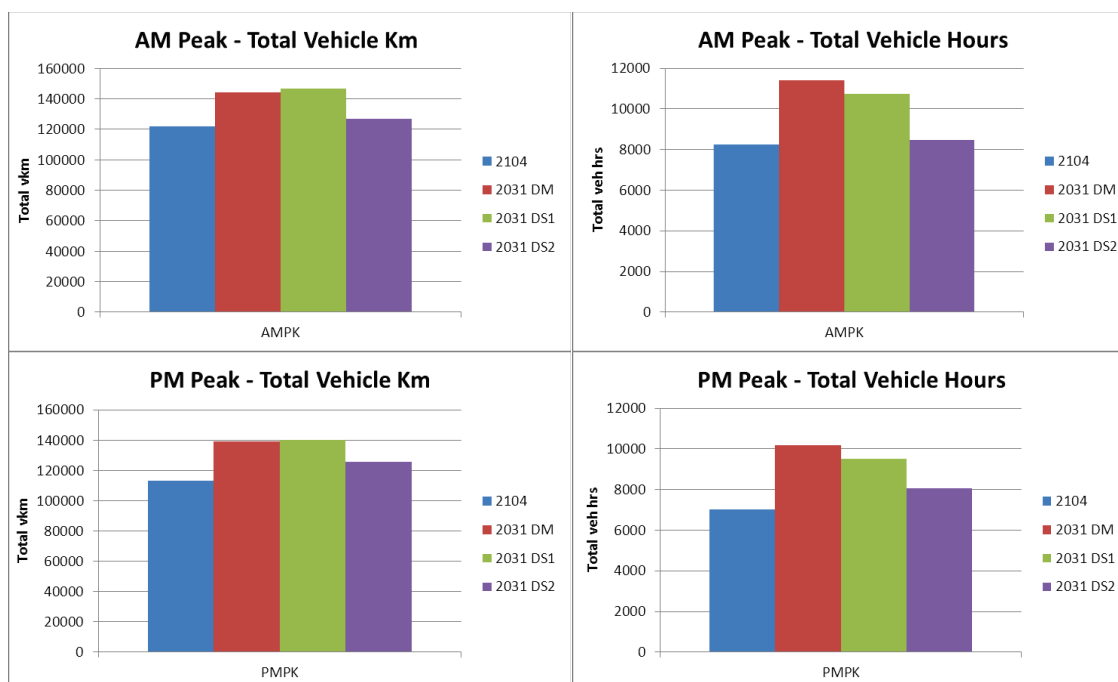
10.3 Network Performance

Data has been extracted from the models to provide an overall measure of the network performance for each scenario. The criteria used to gauge the efficiency of the highway network are the total travel distance, total travel time and the Maidstone wide average vehicle speed. The data summarised in Table 10-5 and illustrated in Figure 10.1 relate to the Maidstone urban area only. It should be noted that the values presented are indicative for comparison purposes only.

Table 10-5: Summary of Network Performance

	AM Peak			PM Peak		
	2031 DM	2031 DS1	2031 DS2	2031 DM	2031 DS1	2031 DS2
Travel distance (vkm)	144500	146700	126900	137500	140200	125700
% diff from 2014	18%	20%	4%	21%	24%	11%
Travel time (veh hrs)	11400	10800	8500	10000	9500	8100
% diff from 2014	38%	30%	3%	42%	35%	15%

Figure 10.1: Network Performance



Higher values for the total travel distance for the forecast models reflect the increase in vehicles on the network and may also indicate that vehicles are taking longer routes to reach their destination, avoiding more congested shorter routes.

The reduced total travel time for 2031 DS1 compared to the 2031 DM reflects the benefits of the provision of the Leeds Langley Bypass which offers a faster route option. However the total travel distance is only marginally changed as traffic may opt to travel further but quicker on the new route.

The 2031 DS2 model has a reduced total vehicle travel distance and vehicle travel time compared with the 2031 DS1. This is the net impact of a reduction in travel demand, due to assumptions around walking and cycling, and an increase in travel by public transport in response to changes to car parking costs and increased bus services.

10.4 Link Flows

A selection of representative link flows have been extracted from the models to provide a comparison of the level flows on key routes. The locations of the links are shown in Figure 5.1 and the flow comparisons are summarised in Figure 10.2 and Figure 10.3.

Both of the 2031 Do Something scenarios modelled indicate a reduction in traffic flows on the selected links compared to the 2031 DM model. The 2031 DS2 model with the reduced vehicle demand generally demonstrates a lower level of traffic apart from the approach the M20 via the A249.

Figure 10.2: 2031 DM, DS1 & DS2 – AM Peak Two-way Flow

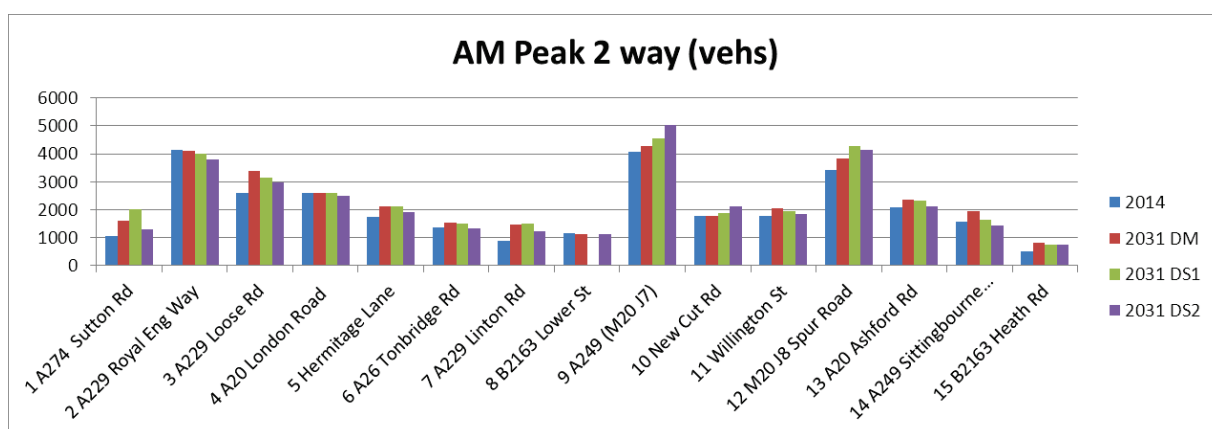
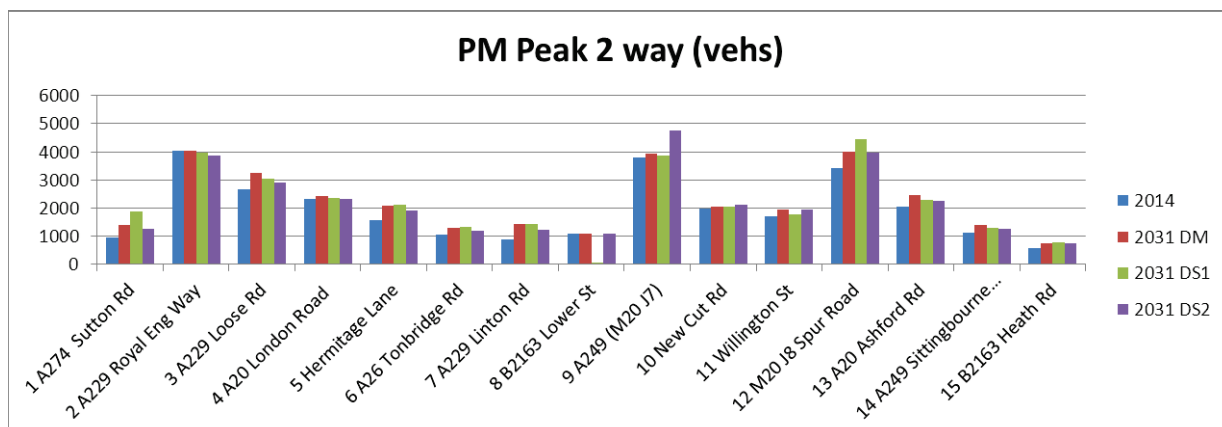


Figure 10.3: 2031 DM, DS1 & DS2 – PM Peak Two-way Flow



10.5 Travel Times

The travel times on the radial routes provide an indication of the performance of different parts of the network. Travel times on the key radial routes have been extracted for each of the models, for the AM and PM peaks. The routes selected are shown in Figure 5.2 and the journey times are summarised in Figure 10.4 to Figure 10.7.

The 2031 DS1 model has the most impact on travel times on routes to the east and south of the town. The 2031 DS2 model has a significantly lower demand than the 2031 DS1 model and generally shows a reduction in travel time compared with the 2031 DS1 scenario. However some routes show a slightly increased travel time which is a reflection of a change in travel patterns around the town.

Figure 10.4: Comparison of Journey Times - AM Peak Inbound

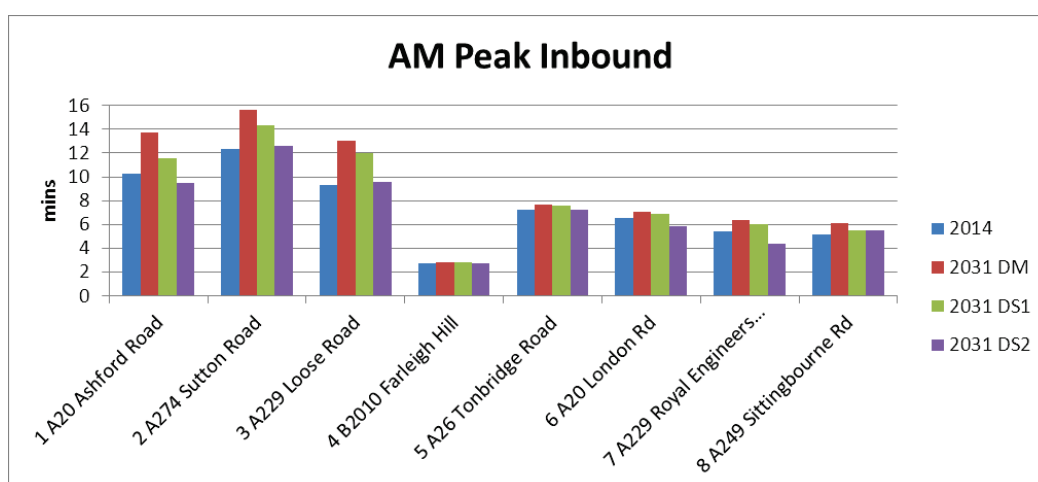


Figure 10.5: Comparison of Journey Times - AM Peak Outbound

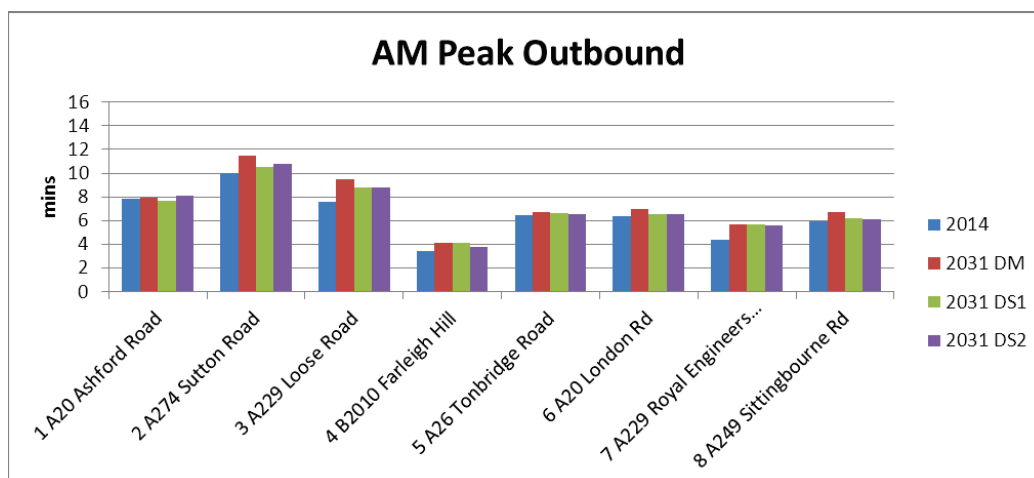


Figure 10.6: Comparison of Journey Times - PM Peak Inbound

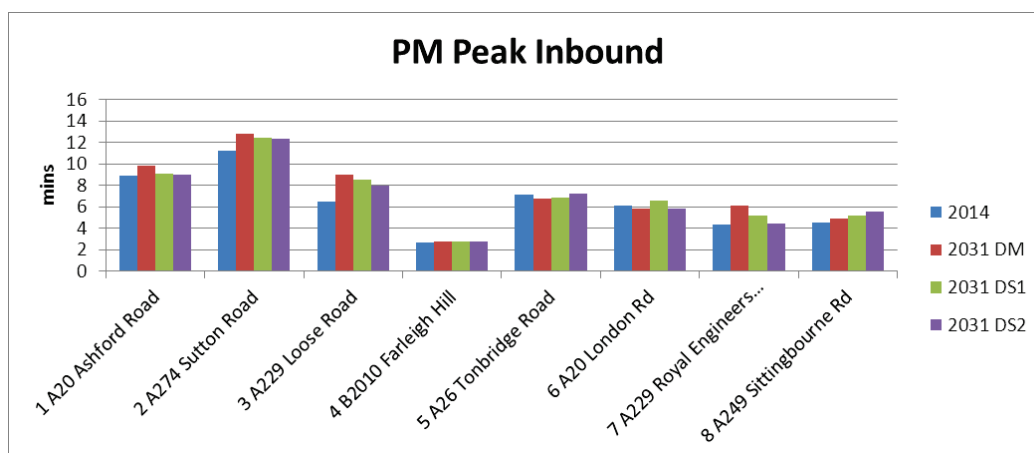
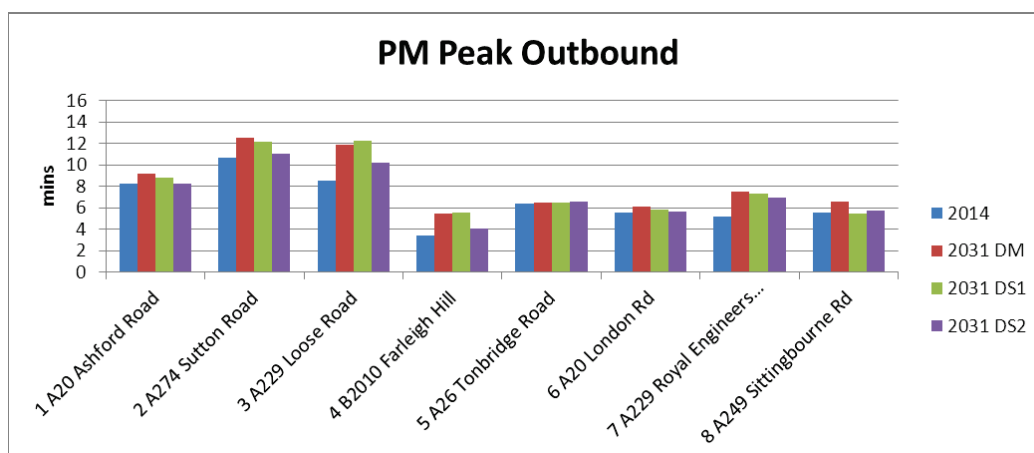


Figure 10.7: Comparison of Journey Times - PM Peak Outbound



10.6 Summary

The network is already operating under stress during peak periods and movement on some of the key radial routes is constrained. The 2031 DM scenario presents a worst case scenario with the minimum intervention envisaged. Although this situation is not expected to arise it provides a benchmark against which to gauge alternative scenarios.

Trips are assigned within the model to the shortest and quickest routes. As the pressures on the system change with the introduction of different measures, the route options for each trip changes and consequently the travel patterns around the town shift.

The outcome of a series of different interventions included in the do something models may not be immediately apparent from link flows or travel times on particular roads, as trips are assigned to alternative routes in response to delays. The individual link flows and indicative travel times therefore only provide part of the picture for the highway model. They should be weighed alongside wider network performance indicators and the level of demand assigned.

11 Concluding Comments

2031 Do Minimum

The 2031 DM provides a worst case scenario, giving an indication of the potential impact of the current forecast development on a largely unchanged network, apart from the Bridges Gyratory which is included in all the forecast models. The Bridges Gyratory scheme will provide some benefit for movements through the town from south to north.

In reality the 2031 Do minimum is an unlikely scenario as highway and public transport provision would be expected to evolve alongside development over time. It does, however, provide a useful benchmark against which to gauge the impact of alternative scenarios. In the absence of proactive measures to attract trips to sustainable modes an additional 6000 vehicle trips will need to be accommodated on the highway network by 2031.

With no intervention other than the Bridge Gyratory improvement scheme the 2031 DM scenario demonstrates that there would be a significant increase in travel time and travel distance over current conditions. The increase in total travel time is a response to the additional demand on the network which generates more delay. The additional traffic and the diversion of traffic on longer routes around the town to avoid congestion contribute to the increase in the network total travel distance. The outputs suggest a significant increase in congestion and delay on the urban highway network when compared with 2014 baseline conditions.

2031 Do Something 1

The 2031 DS1 model is essentially a highway based scenario with the same forecast total travel demand as the 2031 DM model. This model is focussed largely on highway improvements at key junctions across the town and also on the provision of a Leeds/Langley bypass to the east of Maidstone. The Leeds/Langley route as modelled is based on broad assumptions about alignment, junctions and connections. This scheme accounts for approximately 4km of a new major road, various link roads and a number of new junctions.

Compared to the 2031 DM model the 2031 DS1 model shows a small increase in total travel distance but a reduction in total travel time, suggesting a more efficient use of the network. The increase in travel distance is the net result of an element of traffic having the option of a longer but faster route. The knock on effect of this will be the release of some capacity and the reassignment of an element of traffic that was diverting around the town in the 2031 DM, back to a shorter route through the town.

This scenario has limited impact on the mode of travel chosen.

The impact of the Leeds/Langley route alone cannot be separated from the rest of the highway package.

2031 DS2

The 2031 DS2 model includes a number of highway improvements across the town as well as a package of improvements to public transport, a new Park & Ride site at Linton Corner, increased parking charges and some fundamental changes to assumptions around car occupancy and the proportion of trips by walking or cycling modes.

The Maidstone model is essentially a highway based model which does not include walking and cycling modes of travel. Consequently the very broad assumptions proposed for growth around walking and cycling mode share have been reflected in the model by a simple reduction in home based car trips within the detailed modelled area.

The reduced trip demand, together with the attraction of trips to public transport, is reflected in a reduced number of vehicles on the network and consequently in a more moderate impact on the total travel time and travel distance compared with the 2031 DM and 2031 DS1.

Despite the more constrained demand, there are parts of the network where traffic flows and travel times increase.

Issues to be Considered

The 2031 DM model indicates that the network will have to cater for some 6,000 additional vehicle movements during the peak periods by 2031. In the absence of a specific package of transport interventions there will be a significant increase in travel time and travel distance across the network.

Although the 2031 DS1 and DS2 models have some features in common, they present different approaches to the management of potential problems generated by the forecast development in and around Maidstone, as indicated in the 2031 DM model. Neither of the scenarios modelled may actually be achievable in reality, but they demonstrate the possibilities of different strategies.

The highways based transport strategy (2031 DS1) includes a major new extension to the network in the form of a Leeds/Langley bypass. This scenario caters for a similar number of vehicles on the network to the 2031 DM and has an increase in the vehicle distance but operates more efficiently in terms of travel time.

The 2031 DS2 scenario is based on a constrained trip generation (allowing for increased walking and cycling) and significant incentives for public transport. As a consequence this version of the 2031 Do something handles a lower forecast traffic demand reflected in the lower travel distance and travel time.

It is important to note, however, that the model results should be regarded as indicative only as both of the 2031 Do Something scenarios modelled have some level of uncertainty regarding their achievability. These are summarised below:

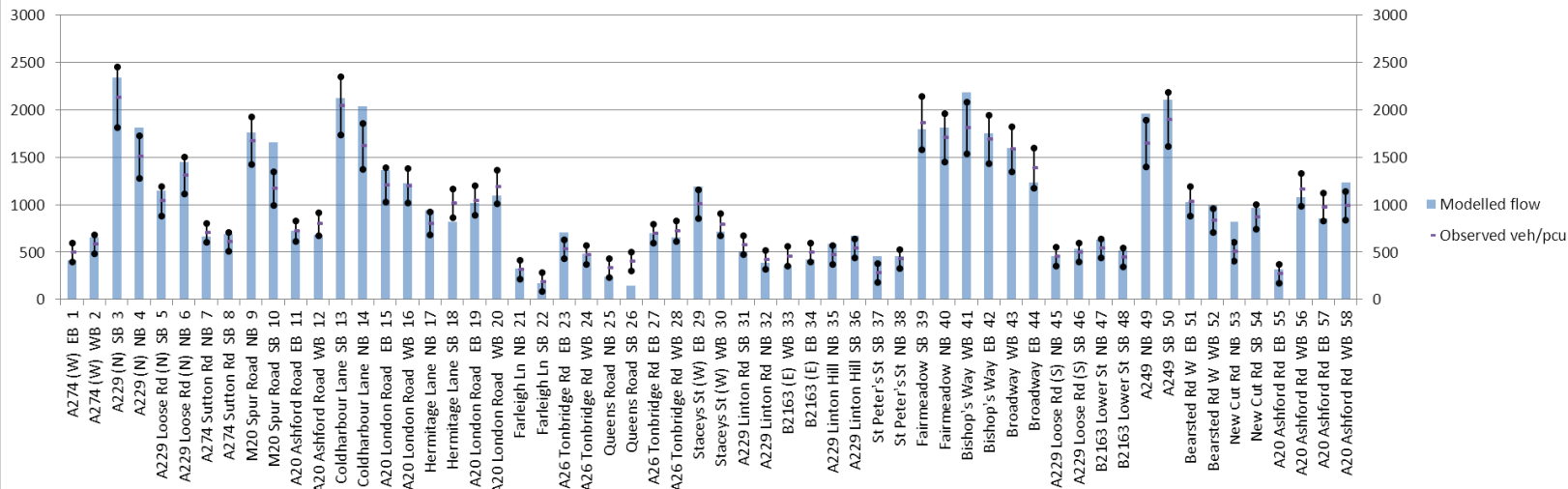
- The key element of the 2031 DS1 model, in the form of the Leeds/Langley bypass, will need to be considered in terms of deliverability and a more detailed appraisal of the potential benefits that may be attributed to it.
- The aspirations for sustainable mode share and public transport provision included in the 2031 DS2 model are very ambitious and will need to be supported by a sense check on what is practical and achievable. In particular, the levels of mode shift from car to walking and cycling and also the increased level of car occupancy which have been pre-determined within the model will need to be sense checked against comparable case studies to ensure they are reasonable assumptions



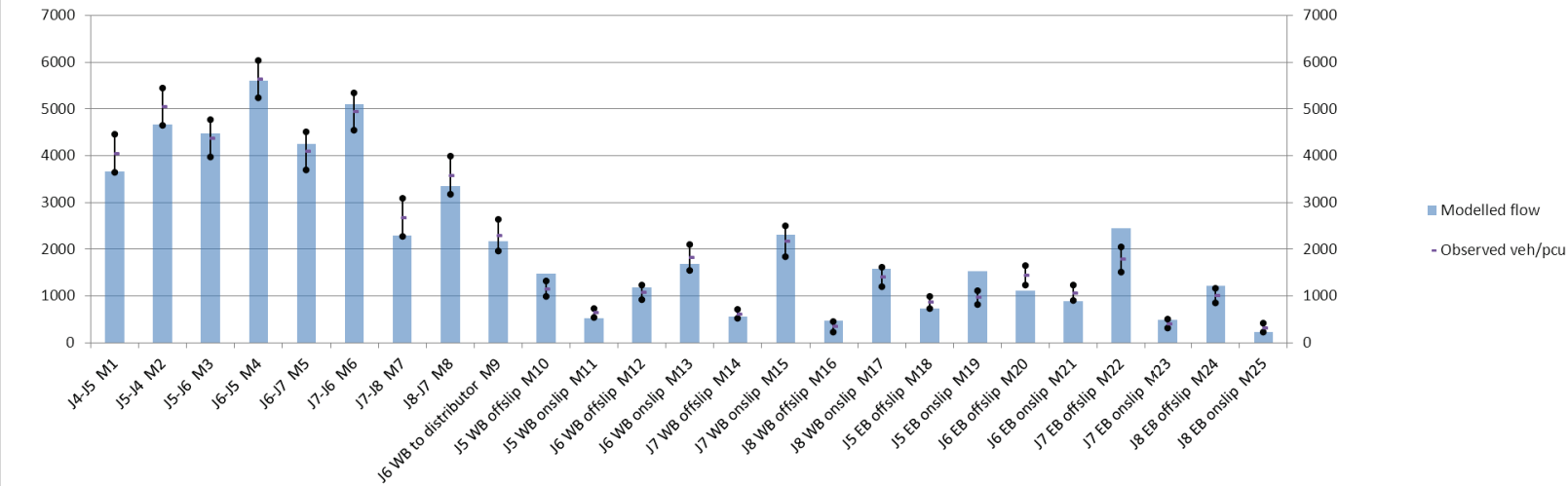
Appendix A 2014 Model Output Summary



AM Peak - Flow criteria

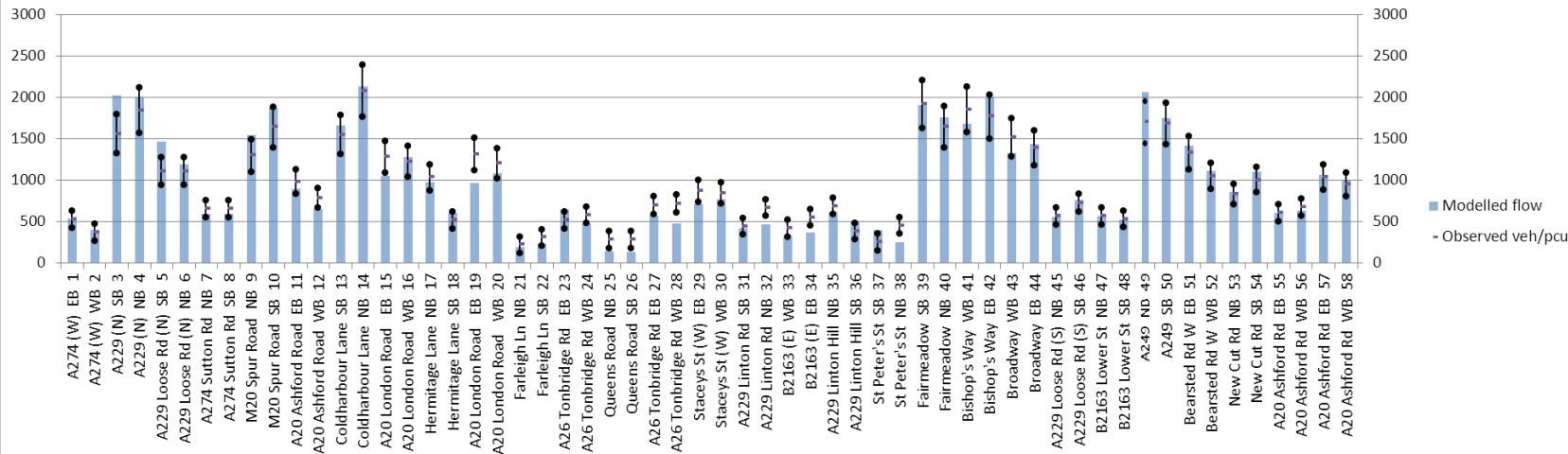


AM Peak - Flow criteria - M20 links

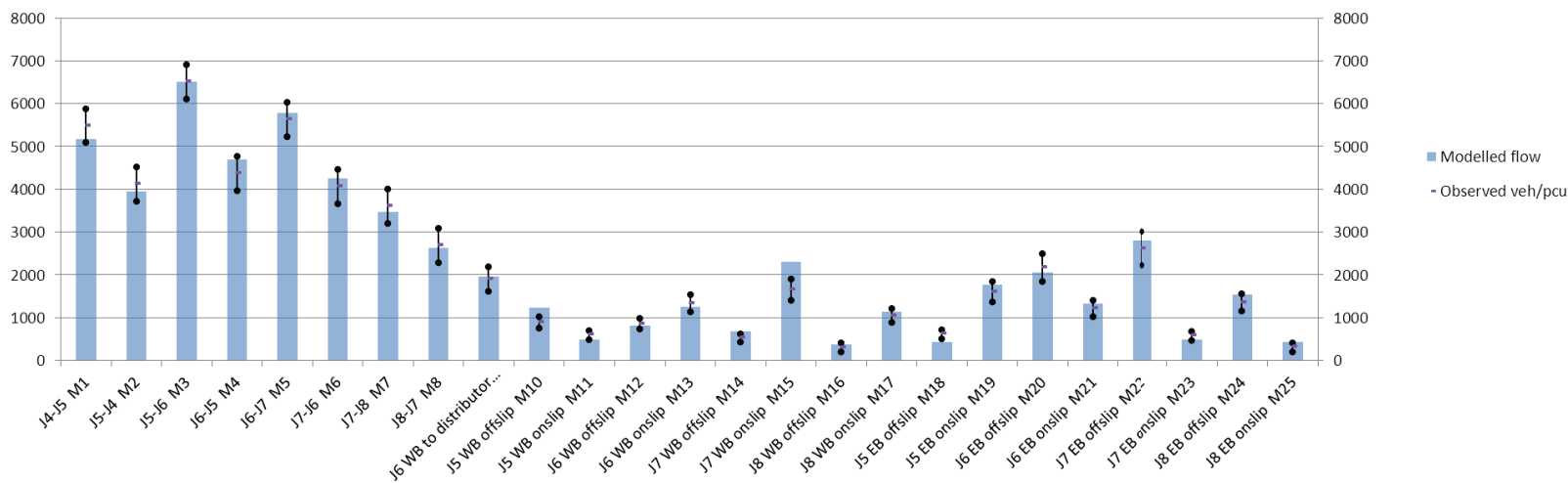




PM Peak - Flow criteria



PM Peak - Flow criteria - M20 links





Summary of model link flows (Maidstone links only)

	AM Peak	PM Peak
Number of sites	58	58
Total meeting GEH criteria	44	39
Total meeting flow criteria	42	40
Total meeting GEH and/or flow criteria	45	42
% meeting GEH and/or flow criteria	78%	72%

Summary of model link flows (including M20 traffic)

109

	AM Peak	PM Peak
Number of sites	83	83
Total meeting GEH criteria	58	57
Total meeting flow criteria	57	56
Total meeting GEH and/or flow criteria	63	61
% meeting GEH and/or flow criteria	76%	73%

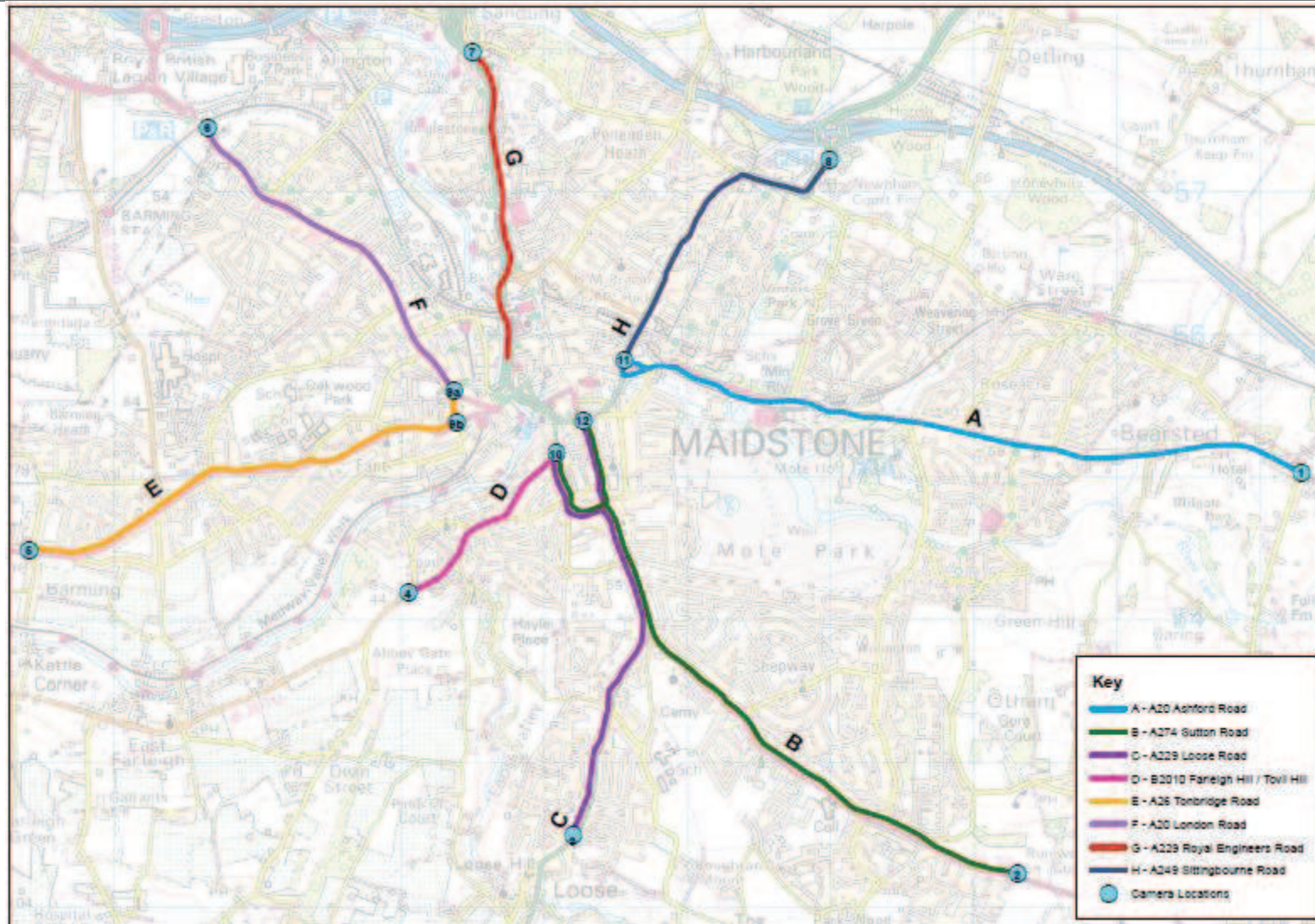
Note:

The model flows have been compared with available data from a variety of sources. The data has been recorded for different purposes, at different times of the year, and in some cases appears to be recorded as pcus and in others as vehicles. The M20 flows are reported separately. Some through movements on the M20 and slip roads have been manually adjusted to give a reasonable representation of flows on the motorway. These movements have no connection with the Maidstone area.

AM Peak Journey Time

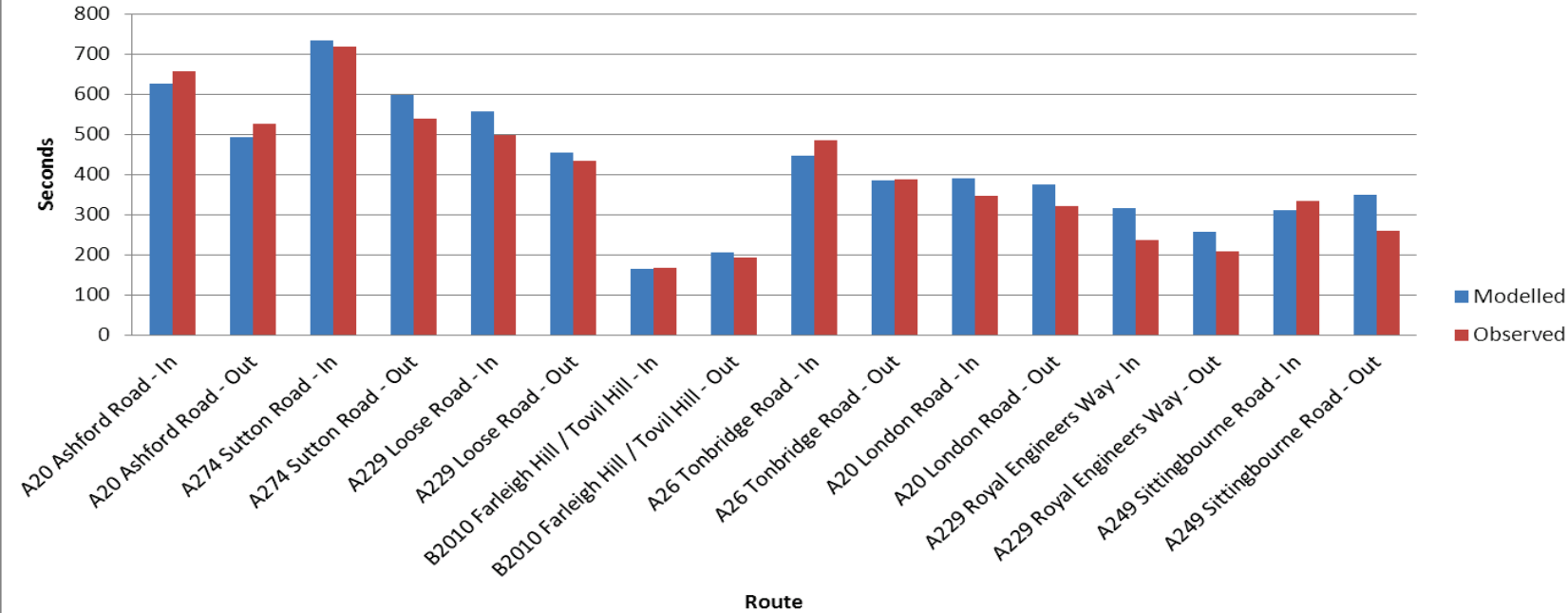
Route Ref	Route Description	Direction		Journey time in seconds			Difference (%)	DMRB Criteria
				Modelled	Observed	Difference		
A	A20 Ashford Road	W	In	627	658	31	-5%	pass
		E	Out	493	528	35	-7%	pass
B	A274 Sutton Road	NW	In	736	720	-16	2%	pass
		SE	Out	600	540	-60	11%	pass
C	A229 Loose Road	N	In	557	499	-58	12%	pass
		S	Out	455	435	-20	4%	pass
D	B2010 Farleigh Hill / Tovil Hill	NE	In	166	170	4	-2%	pass
		SW	Out	208	195	-13	7%	pass
E	A26 Tonbridge Road	E	In	447	486	39	-8%	pass
		W	Out	387	390	3	-1%	pass
F	A20 London Road	SE	In	391	348	-43	12%	pass
		NW	Out	377	324	-53	17%	pass
G	A229 Royal Engineers Way	S	In	318	238**	-80	34%	fail
		N	Out	259	209	-50	24%	pass
H	A249 Sittingbourne Road	SW	In	311	335	24	-7%	pass
		NE	Out	351	261*	-90	35%	fail

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AM - Modelled and Observed Journey Times



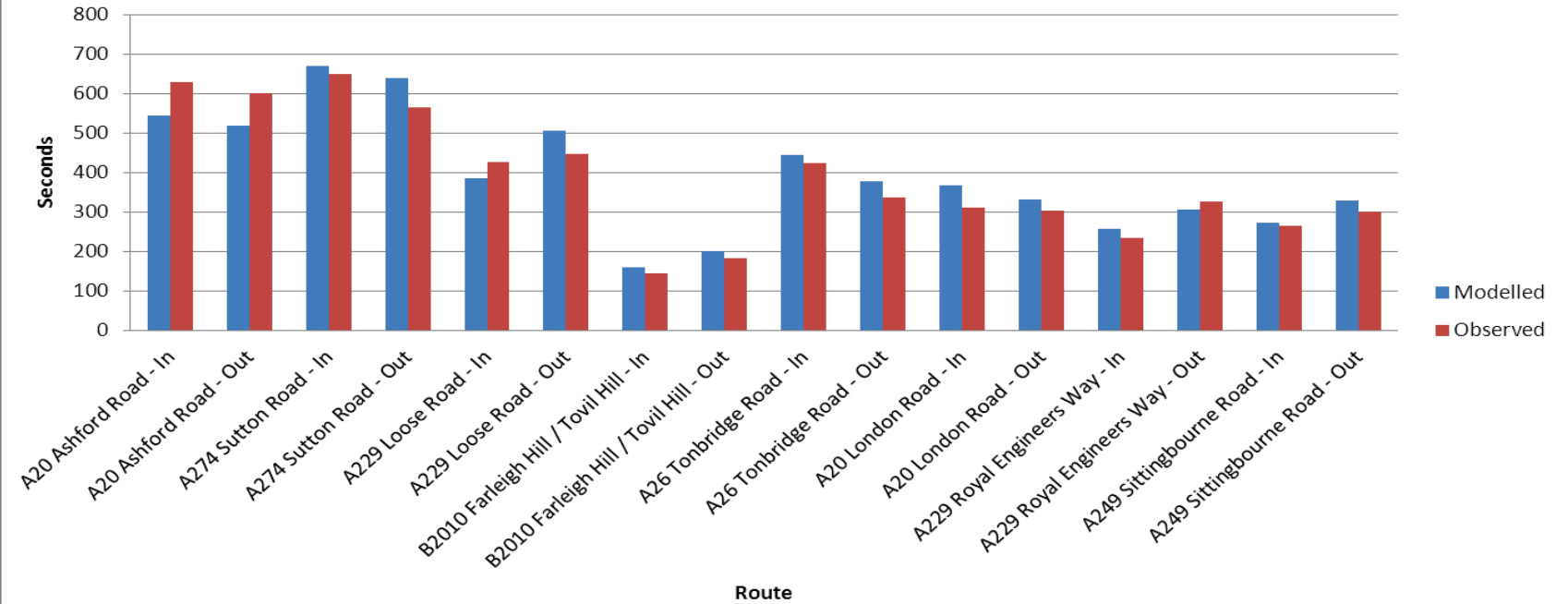
PM Peak Journey Time

Route Ref	Route Description	Direction		Journey time in seconds			Difference (%)	DMRB Criteria
				Modelled	Observed	Difference		
A	A20 Ashford Road	W	In	545	630	85	-13%	pass
		E	Out	521	601	80	-13%	pass
B	A274 Sutton Road	NW	In	671	650	-21	3%	pass
		SE	Out	639	566	-73	13%	pass
C	A229 Loose Road	N	In	387	427	40	-9%	pass
		S	Out	507	447	-60	13%	pass
D	B2010 Farleigh Hill / Tovil Hill	NE	In	161	145	-16	11%	pass
		SW	Out	202	184	-18	10%	pass
E	A26 Tonbridge Road	E	In	445	424	-21	5%	pass
		W	Out	379	338	-41	12%	pass
F	A20 London Road	SE	In	369	311	-58	19%	pass
		NW	Out	333	305	-28	9%	pass
G	A229 Royal Engineers Way	S	In	259	236	-23	10%	pass
		N	Out	308	328	20	-6%	pass
H	A249 Sittingbourne Road	SW	In	273	265	-8	3%	pass
		NE	Out	331	303*	-28	9%	pass

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PM - Modelled and Observed Journey Times



Note:

The majority of observed times are from ANPR camera data. Where anomalies were identified alternative data has been used where available.

*A249 Sittingbourne Road - timing outbound is likely to be affected by Enterprise Park signals and revised layout at the Bearsted Road roundabout. Additional data was collected during July for the PM as a sense check (as used in table above). The outbound model times remain longer than the July observed times but fall within the normal criteria. No new data is available for AM peak outbound.

****A229 Royal Engineers Way – Anomalies** were noted between modelled and ANPR journey times across the town centre. A limited number of travel times were recorded in July for the radial route only, between the M20 slip roads and Earls Street signals. The PM timings indicated a reasonable match with modelled data. The model AM timings were around 80 seconds longer than the recorded times in July. It would be reasonable to expect AM peak observed travel times inbound on this route to be longer in the usual neutral months.

Appendix B ITS Model Specification

ITS Action Plan Number	ITEM	DESCRIPTION		MODELLING SPECIFICATION / COMMENTS	To be Included in ITS Package?
P&R Schemes					
5	Change P&R fare structure to pay-to-park rather than pay-to-ride	As with most other P&R schemes, cars should pay to park and catch the bus for free. £3 per vehicle should be assumed.		Cant be modelled?	Include if can
17	Maintain existing P&R	Maintain existing P&R		Not to be modelled (enhanced service to be included)	N
18	P&R management and objectives	Ensure the objectives, management and budgets for both P&R and Parking Services remain combined and integrated		N/A	N
19	P&R Marketing	Fund and implement a strong marketing campaign for P&R to encourage modal shift to P&R by 2012 and continue indefinitely		N/A	N
N/A	New Park and Ride service from Linton Crossroads to Maidstone town centre	Running non-stop along Loose Road (A229) and terminating at High Street/King Street		Frequency of every 15 minutes	Y
N/A	Improve existing P&R	Increase patronage of existing park and ride sites by increasing capacity, improving the offering, changing fare structure, running later into the evening, live departure screens at bus stops.		Assume a 15-min frequency from all sites, and capacities of 20% higher than now. Services to run 4 per hour until 9pm Monday to Friday, and 3 per hour all weekend (until 6pm on Sundays).	
N/A	P&R priority measures	Bus lanes almost the full length of the routes from P&R sites – London Road, Sittingbourne Road, Loose Road, Ashford Road into town. Each signal junction would have bus priority phasing.		Not to be included	N
N/A	1000 space minimum P & R scheme for J8	1000 space minimum P & R scheme for J8		Cant be modelled?	Include if can
Other Schemes					
1	Implement highway improvement schemes at M20 J7 and J8	This includes work around Sittingbourne Road and Ashford Road	M20, Junction 7 updates. This includes converting the M20 eastbound approach and the two A249 approaches to the roundabout to traffic signals, whilst leaving the M20 westbound approach as a give way; to prevent traffic tailing back on to the motorway during peak periods. In addition, road markings will be rearranged to improve visibility on the roundabout	This includes converting the M20 eastbound approach and the two A249 approaches to the roundabout to traffic signals, whilst leaving the M20 westbound approach as a give way; to prevent traffic tailing back on to the motorway during peak periods. In addition, road markings will be rearranged to improve visibility on the roundabout	Y
			A249 / Bearsted Road Roundabout. This includes capacity improvements and provision of a pedestrian crossing at Bearsted Roundabout	As per KCC Highway package Do Something: - Signalised Junctions at A249 / Bearsted Road junction and Bearsted Road / New Cut Junction - Dual Carriageway between junctions, through changed link capacity and lane provision	Y
			Bearsted Road / New Cut Road Roundabout. This includes capacity improvements and an enlargement of the roundabout		
			Bearsted Road, between Bearsted Roundabout and New Cut Road Roundabout. This includes the upgrading of the road to a dual carriageway in both directions		
			a) Constructing bus priority measures on New Cut Road	Change junction from new cut road onto A20 so that: - Eat into the verge to allow left hand turns to have a slip road with give way at A20 - Allowing room for a bus priority right hand turn lane.	Y
			a) Signalising bus priority measures at the junction of New Cut Road and A20 Ashford Road	As per KCC Highway package Do Something: Junction Capacity and Signals at A20 / Coldharbour	Y
			M20, Junction 5. This will include providing additional capacity on the M20 link roads to Coldharbour Roundabout; Coldharbour Roundabout itself; the 20/20 roundabout and the Hermitage Lane / London Road junction		
			Queens Rd / St Andrews Rd / Tonbridge Rd / Fountain Lane junctions. This includes an opening up of the eastern end of St Andrews Road onto the Queens Road / Tonbridge Road junction. The direction of traffic between each of these junctions would be made one way in a clockwise direction	Include junction proposals for A26 Tonbridge Road / Fountain Lane included in west of hermitage Lane planning application (DHA) http://applications.maidstone.gov.uk/AnitePublicDocs/00652669.pdf0	Y
			a) Hermitage Lane in the vicinity of Barming Rail Station. This would include a new pedestrian crossing near the vehicle access to the rail station. To accommodate this, there will be a requirement to reorganise the existing bus stop layout	Include a signalised pedestrain crossing by barming station	Y
			a) Constructing a new access road between Gore Court Road and Bicknor Wood to provide sufficient access to the new strategic site north of Bicknor Wood	Include new link between Sutton Road and Gore Court Road, see red line in tab "Gore Court Road"	Y
			Widening Gore Court Road between Bicknor Wood and White Horse Lane	Widen Gore Court Road, see orange line in tab "Gore Court Road"	Y
			Willington St / Sutton Rd junction. This includes a widening of the approaches from Willington St to create an additional left turning lane into A274 Sutton Road and provision for entry into a new bus lane	As per KCC Highway package Do Something: - Junction capacity improvmnts through changed lane provisions and signal a adjustment	Y
			a) Constructing a new footway on the north side of Sutton Road	N/A	N
				See No.15	See No.15
			a) Constructing a new northbound dedicated bus lane on the A274 Sutton Road		
a) Signalising the A20 Ashford Rd / Penford Hill Roundabout	Based on junction 8 development (not in demand model) therefore do not include	N			
a) Signalising the A20 Ashford Rd / Eythorne Street / Great Danes Hotel Access	Based on junction 8 development (not in demand model) therefore do not include	N			
Improving the A20 Ashford Rd / M20 Link road Roundabout. The type of roundabout improvement here will depend upon which strategic site is selected (if any) for development as the existing roundabout may need to be upgraded to a four arm roundabout to provide access to site to the south, if this site is selected for development. This difference is reflected in the differing costs shown in the table under paragraph 6.2.5 below	Based on junction 8 development (not in demand model) therefore do not include?	N			
A20 Ashford Rd / Willington Street junction. This includes a widening of the left turning movement from Ashford Road into Willington Street	As per KCC Highway package Do Something: - Junction Capacity and signal improvements, through adjusting the signals	Y			
M20 Junction 8. This includes building a two lane dedicated left slip to the westbound M20 slip road, and a reorganisation of the westbound merge	Based on junction 8 development (not in demand model) therefore do not include	N			



2	Selected improvements at Rural Service Centres	Harrietsham	New pedestrian and cycling link between Harrietsham Primary School and Harrietsham railway station	N/A - included through mode share updates	N
		Headcorn	Footway, carriageway and street-lighting improvements on Grigg Lane and Oak Lane. Improved pedestrian access to the railway station from the east will also be investigated and implemented if viable.	N/A - included through mode share updates	N
		Staplehurst	An increase of approximately 100 car parking spaces at Staplehurst Railway Station to accommodate the additional movements expected as a result of new development in the village	Cant be modelled	N
			A new pedestrian and cycling link between the railway station and the residential area to the south of the Lodge Road Industrial Estate	N/A - included through mode share updates	N
			Improvements to the ease and quality of bus/rail interchange within the vicinity of the railway station	Cant be modelled	N
			Construction of a new pedestrian crossing of Marden Road in the vicinity of its junction with Limetrees	Include a signalised pedestrain crossing on Marden Road in the vicinity of its junction with Limetrees	Y
3	Enlarge Barming Station car park	200 space increase		Cant be modelled?	Include if can
4	Introduce 16+ travel pass	KCC has committed to introduce a new bus pass for 16-19 year olds, to make travel more affordable for sixth formers, college students and apprentices		N/A	N
6	Introduce parking standards appropriate to the borough's requirements	Adopt LCC's standards in the short term - Report on this to follow in the next 2 weeks		N/A	N
7	Increasing long stay parking tariffs on council-owned sites above inflation	50% increase in real terms above inflation by 2031		Cant be modelled?	Include if can
8	Increasing short stay parking tariffs on council-owned sites above inflation	50% increase in real terms above inflation by 2031		Cant be modelled?	Include if can
9	Implement travel plans	Implement MBC and KCC travel plans to more effeciently manage travel behaviour		N/A	N
10	Establish A20 Quality Bus Partnership scheme	Establish A20 Quality Bus Partnership scheme		N/A	N
11	Lobby Government for improved rail services	Lobby Government for improved rail services		No Change (noting DM already included Thameslink enhancements)	N
12	Subsidised shuttle bus between M20 J7 and town centre	Subsidised shuttle bus between M20 J7 and town centre		To run every 20 minutes from notcutts, down new cut road, along A20 to the bus station - where it can turn around and go back down wat tyler way and along the A20 back to notcutts.	Y
13	Intelligent transport systems	Maintain and develop Maidstone's intelligent transport systems and proactive sharing of real time		N/A	N
14	Public realm improvement	Pedestrianisation of key thoroughfares, streetscaping etc		N/A - included through mode share updates	N
15	Bus Only northbound lane on A274	Bus Only northbound lane on A274 Sutton Road from Willington Street to the Wheatsheaf		Bus Only northbound lane on A274 Sutton Road from Willington Street to the Wheatsheaf	Y
16	Public bus service improvements	A regular bus service along all of Maidstone's key radial roads		7-minute frequencies on main radial routes into the town centre between 7am and 7pm	Y
20	Expansion of the County Hall Car Club	Specific funding to promote car clubs in Maidstone		N/A	N
21	Implement Maidstone Cycling Strategy	Implement Maidstone Cycling Strategy		N/A - included through mode share updates	N
22	Implement Air Quality Action Plan	Implement Air Quality Action Plan		N/A	N
23	Maintain and promote KCC's car sharing website	Assume car sharing increases by 5% of overall mode share into Maidstone town centre by 2031?		Cant be modelled?	Include if can
24	Real Time Information	Install real-time / up-to-date travel information in selected bus shelters across the borough		N/A	N
25	Secure Travel Plans for new development coming forward	Secure Travel Plans for new development coming forward		N/A	N
26	Ensure road safety education continues to be provided for	Ensure road safety education continues to be provided for across the borough		N/A	N
27	Romney Place Bus Lane	Bus Only Lane turning left onto Romney Place from Lower Stone Street		Bus Only Lane turning left onto Romney Place from Lower Stone Street	Y
28	Maintain the Kent Messenger 'Walk to School' Charity and 'New Ways 2 Work' Initiatives	Maintain the Kent Messenger 'Walk to School' Charity and 'New Ways 2 Work' Initiatives		N/A	N
29	Wayfinding Improvmnts	Improve street signage with better pedestrian wayfinding and reduce footway clutter, in particular in town and rural centres		N/A - included through mode share updates	N
30	Bridges Gyratory	New Northbound link to bypass the gyratory via the two bridges		Already included in the DM	DM
N/A	Cycle Mode Share (by implementing the cycle strategy)	A borough-wide increase in cycle and walking mode share, as a result of improved cycle links, parking, wayfinding, street lighting, crossings and so on. The sugested mode shares form part of the ITS targets		An 8.5% increase in cycling mode share over 2014 base (0.5% per year).	Y
N/A	Walking Mode Share			An 8.5% increase of walking mode share over 2014 base year (0.5% per year).	Y

N/A	£3m LEP funding for cycleway (from Teston CP to Aylesford villlage	£3m LEP funding for cycleway (from Teston CP to Aylesford village	N/A - inlcuded through mode share updates	N
N/A	NW Bus Loop	Circular Bus route connecting the town centre - hermitage lane - hospital - howar drive - london road	From the east of hermitage lane site a bus only route will be built from the site linking onto Howard Drive which will create the loop route for the buses to use. Frequency: every 15 minutes Stopping Pattern: all stops on route and one on Howards Way	Y
N/A	Cycleway a274-Brishing Lane	Cycleway a274-Brishing Lane	N/A - inlcuded through mode share updates	N
N/A	A229/A274 Wheatsheaf Junction	Close exit to Cranbourne Avenue, Adjusting turning movements and signal adjustment	Include as coded in KCC highway run: Close exit to Cranbourne Avenue, Adjusting turning movements and signal adjustment	Y
N/A	A274 / Wallis Avenue Junction	Junction Capacity improvements, through lane provision and signal changes	Include as coded in KCC highway run: Junction Capacity improvements, through lane provision and signal changes	Y
N/A	Leeds - Langley Bypass	New route linking A274 and A20 based on 1997 approved route	Not to be included	N

Appendix C Housing and Commercial Development Allocation

Source	Housing Allocation
completions 11 12	873
completions 12 13	630
completions 13 14	423
MBWLP 2000 Allocations	49
approved subject to S106 to 280214	219
Extant Permissions to April 2014	1758
LP allocations SHLAA sites (LP policy H1) - NW strategic	1155
LP allocations SHLAA sites (LP policy H1) - SE strategic	2781
LP allocations SHLAA sites (LP policy H1) - other	2052
LP allocations SHLAA sites (LP policy RMX1) - retail & mixed use	520
H1 rural service centre - Harrietsham	315
H1 rural service centre - Lenham	245
H1 rural service centre - Marden	398
H1 rural service centre - Staplehurst	905
H1 rural service centre - Headcorn	350
H1 Larger villages - Coxheath	410
H1 Larger villages - Yalding	65
H1 Larger villages - Boughton Monchelsea	45
H1 Larger villages - Eythorne Street (Hollingbourne)	45
Sites Likely to come forward	243
Future locations for housing (locate across town centre)	600
Future locations-Lenham	1300

Source	Housing Allocation
Future locations-Invicta Barracks	1500
Windfall allowance estimate for final 5 years of trajectory	500
TOTAL	17381

Local Plan Employment Sites Location	Use Class	m2
Mote Road, Maidstone	B1a	8000
South of Claygate, Pattenden Lane, Marden	B1/B2/B8	6800
West of Wheelbarrow Industrial Estate, Pattenden Lane, Marden	B2/B8	14500
West of Barradale Farm, Maidstone Road, Headcorn	B1b & c /B2/B8	5500

Local Plan Mixed Use Sites Location	Use Class	m2
Newham Court, Bearsted Road, Maidstone	A1e	700
Newham Court, Bearsted Road, Maidstone	C2	75000
Newham Court, Bearsted Road, Maidstone	C2	25000
Maidstone East and Maidstone Sorting Office, Sandling Road, Maidstone	A1/A1e	10000
King Street car park and former AMF Bowling site, Maidstone	A1	1400
Clockhouse Farm, Heath Road, Coxheath	B1	7700
Former Syngenta works, Hampstead Lane, Yalding	B1/B2	8600

Appendix D ITS Interventions Modelled for 2031 DS1

ITS Action Plan Number	Transport Intervention Proposed	Description / modelling	Modelling comment
5	Change PR fare structure to pay-to-park rather than pay-to-ride. £3 per vehicle should be assumed	As with most other P&R schemes, cars should pay to park and catch the bus for free. £3 per vehicle should be assumed.	PR cost (as fare or parking charge) included in PR mode choice process. PR cost (previously £2.50) adjusted to £3.00
17	Maintain existing P&R	Maintain existing P&R	No change to existing P&R
No number	New Park and Ride service from Linton Crossroads to Maidstone town centre.	Running non-stop along Loose Road (A229) and terminating at High Street/King Street. Assume a 15-min frequency from all sites, and capacities of 20% higher than now. Services to run 4 per hour until 9pm Monday to Friday, and 3 per hour all weekend (until 6pm on Sundays).	The new park and ride service is assumed to access the site via the A229 south of Linton crossroads. The service is assumed to stop at the Linton Corner Park and Ride site, Mill Street, High Street and terminate at Kings Street. The additional stop at Mill Street is on the route into town and increases accessibility to trips from that side of town. Bus capacity is not reflected in the model.

ITS Action Plan Number	Transport Intervention Proposed	Description / modelling	Modelling comment
No number	Improve existing P&R	<p>Increase patronage of existing park and ride sites by increasing capacity, improving the offering, changing fare structure, running later into the evening, live departure screens at bus stops.</p> <p>Assume a 15-min frequency from all sites, and capacities of 20% higher than now. Services to run 4 per hour until 9pm Monday to Friday, and 3 per hour all weekend (until 6pm on Sundays).</p>	<p>All P&R services are at 15 minute intervals.</p> <p>P&R site capacity is not reflected in the model.</p> <p>Peak periods modelled only.</p>
1	Implement highway improvement schemes at M20 J7 and J8	M20, Junction 7 updates. This includes converting the M20 eastbound approach and the two A249 approaches to the roundabout to traffic signals, whilst leaving the M20 westbound approach as a give way; to prevent traffic tailing back on to the motorway during peak periods. In addition, road markings will be rearranged to improve visibility on the roundabout	Signal arrangement and junction layout from the planning application for Newnham Court.
		A249 / Bearsted Road Roundabout. This includes capacity improvements and provision of a pedestrian crossing at Bearsted Roundabout	Signalised Junctions at A249 / Bearsted Road junction and Bearsted Road / New Cut Junction.

ITS Action Plan Number	Transport Intervention Proposed	Description / modelling	Modelling comment
		Bearsted Road / New Cut Road Roundabout. This includes capacity improvements and an enlargement of the roundabout	Dual Carriageway between junctions includes changed link capacity and lane provision.
		Bearsted Road, between Bearsted Roundabout and New Cut Road Roundabout. This includes the upgrading of the road to a dual carriageway in both directions	
		a) Constructing bus priority measures on New Cut Road	Junction layout reconfigured. Bus priority measures not modelled specifically.
		b) Signalising bus priority measures at the junction of New Cut Road and A20 Ashford Road	
		M20, Junction 5. This will include providing additional capacity on the M20 link roads to Coldharbour Roundabout; Coldharbour Roundabout itself; the 20/20 roundabout and the Hermitage Lane / London Road junction	Junction capacity, lane allocation and signal arrangement as per planning application TA.
		Queens Rd / St Andrews Rd / Tonbridge Rd / Fountain Lane junctions. This includes an opening up of the eastern end of St Andrews Road onto the Queens Road / Tonbridge Road junction. The direction of traffic between each of these junctions would be made one way in a clockwise direction.	Reconfiguration of network around St Andrews Road not modelled. Improvements to signal arrangements included in the model as per planning application TA.

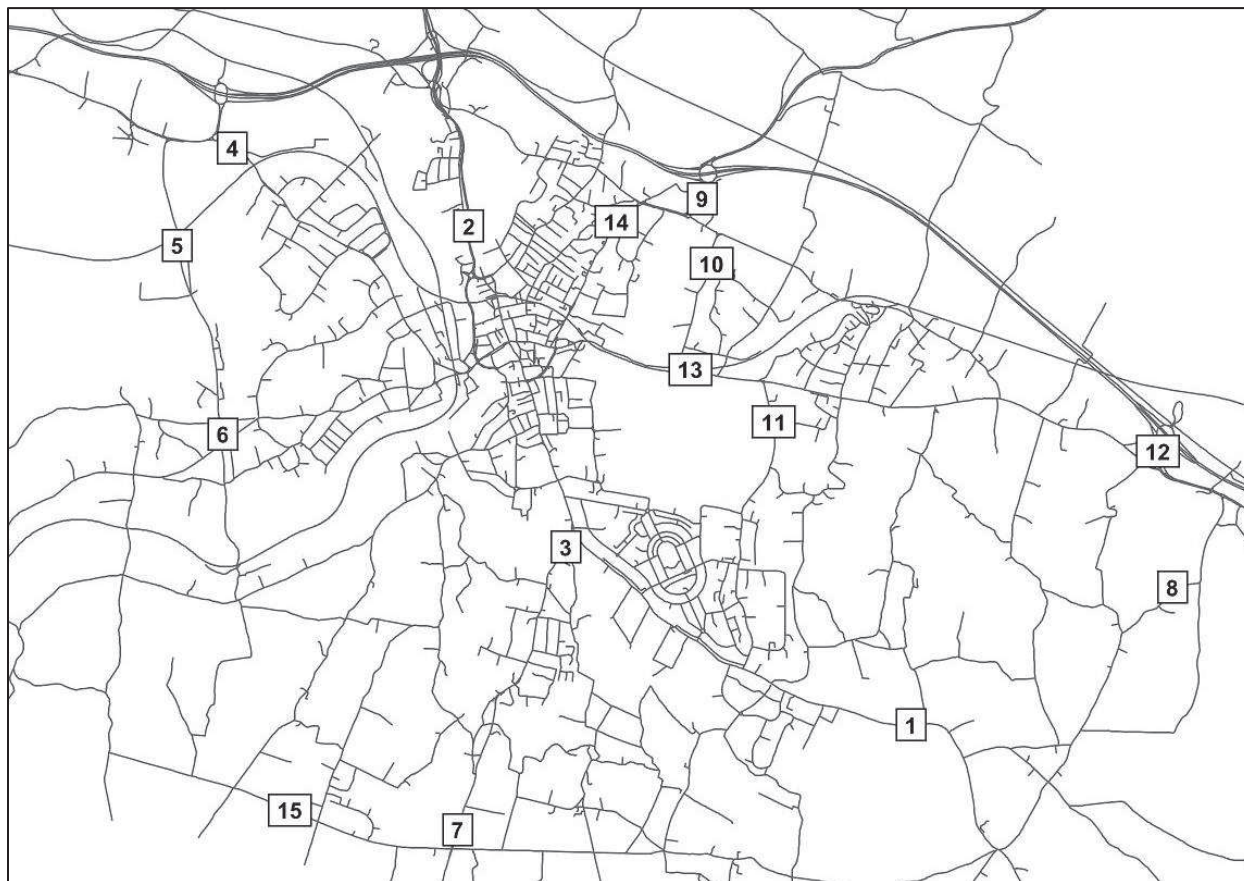
ITS Action Plan Number	Transport Intervention Proposed	Description / modelling	Modelling comment
		a) Hermitage Lane in the vicinity of Barming Rail Station. This would include a new pedestrian crossing near the vehicle access to the rail station. To accommodate this, there will be a requirement to reorganise the existing bus stop layout	New pedestrian signals included near to Barming Station.
		a) Constructing a new access road between Gore Court Road and Bicknor Wood to provide sufficient access to the new strategic site north of Bicknor Wood.	New link between Gore Court Rd and Bicknor Wood modelled. Give way junction assumed at each end.
		Willington St / Sutton Rd junction. This includes a widening of the approaches from Willington St to create an additional left turning lane into A274 Sutton Road and provision for entry into a new bus lane.	Junction capacity improvements through changed lane provisions and signal adjustment.
		a) Constructing a new northbound dedicated bus lane on the A274 Sutton Road.	Bus lanes are not modelled specifically. The impact of a bus lane on traffic can be reflected in available road capacity. The bus lane is assumed to be offline and to stop in advance of junctions and will have no impact on available road capacity for other vehicles.
		A20 Ashford Rd / Willington Street junction. This includes a widening of the left turning movement from Ashford Road into Willington Street.	Junction Capacity and signal improvements, through adjusting the signals. Signal arrangement from planning application TA.

ITS Action Plan Number	Transport Intervention Proposed	Description / modelling	Modelling comment
7	Increase long stay parking tariffs on council owned sites above inflation.	50% increase in real terms above inflation.	Car park cost per zone (representing balance of long stay and short stay) is included in the mode choice model. 50% increase applied.
8	Increase short stay parking tariffs on council owned sites above inflation.	50% increase in real terms above inflation.	
12	Subsidised shuttle bus between M20 J7 and town centre.	Subsidised shuttle bus between M20 J7 and town centre. To run every 20 minutes from Notcutts, down new cut road, along A20 to the bus station - where it can turn around and go back down Watt Tyler way and along the A20 back to Notcutts.	New shuttle bus route from Notcutts to the bus station with no stops in between, to run at 20 minute intervals.
15	Bus Only northbound lane on A274.	Bus Only northbound lane on A274 Sutton Road from Willington Street to the Wheatsheaf.	Bus lanes are not modelled specifically. The impact of a bus lane on traffic can be reflected in available road capacity. The bus lane is assumed to be offline and to stop in advance of junctions and will have no impact on available road capacity for other vehicles.

ITS Action Plan Number	Transport Intervention Proposed	Description / modelling	Modelling comment
16	Public bus service improvements.	A regular bus service along all of Maidstone's key radial roads (7-minute frequencies on main radial routes into the town centre between 7am and 7pm).	Bus services on main radial routes into the town centre increased to 7 minute frequencies. Additional services for A229 (S), A229 (N) and A20€ corridors. 65 buses added over 3 hour AM peak period and 56 for the PM peak period.
23	Maintain and promote KCC's car sharing website.	Assume car sharing increases by 5% of overall mode share into Maidstone town centre by 2031?	Car sharing reflected in the model by car occupancy. Existing average car occupancy is 1.23 for both AM and PM peaks. An increase in car occupancy of 5% will take this to a new occupancy level of 1.29. This has been applied to trip generation for the new development.
27	Romney Place Bus Lane.	Bus Only Lane turning left onto Romney Place from Lower Stone Street.	Buses only allowed to turn left from Lower Stone Street to Romney Place.
30	Bridges Gyratory	New Northbound link to bypass the gyratory via the two bridges.	New link included and lane allocation and signal arrangements adjusted.
No number	Cycle Mode Share (by implementing the cycle strategy).	An 8.5% increase in cycling mode share over 2014 base (0.5% per year).	Walking and cycling modes not modelled and 2014 base levels of walking and cycling are not known. A reduction in car trips (for home based trips in the Maidstone urban area only) has been used as a proxy for the increase in walking and cycling mode share.
No number	Walking Mode Share.	An 8.5% increase of walking mode share over 2014 base year (0.5% per year).	

ITS Action Plan Number	Transport Intervention Proposed	Description / modelling	Modelling comment
No number	NW Bus Loop.	Circular Bus route connecting the town centre - Hermitage Lane - Hospital - Howard Drive - London Road. From the east of Hermitage Lane site a bus only route will be built from the site linking onto Howard Drive which will create the loop route for the buses to use. Frequency: every 15 minutes. Stopping Pattern: all stops on route and one on Howards Way.	Extension of existing route 79 to create a loop route linking Howard Drive, Hermitage Lane and the hospital. Plan of bus route from TA for Land east of Hermitage Lane.
No number	A229/A274 Wheatsheaf Junction.	Close exit to Cranbourne Avenue, Adjusting turning movements and signal adjustment.	Exit from Wheatsheaf junction to Cranbourne Avenue closed. Signals and lane allocations adjusted.
No number	A274 / Wallis Avenue Junction.	Junction Capacity improvements, through lane provision and signal changes.	Lane allocation and signal arrangement adjusted as per Planning application TA.

Appendix E Model Output



AM Link Flows

Site	Link	Dir	2014 Refresh	2031 DM	2031 DS1	2031 DS2
1	A274 (W)	EB	400	900	1050	800
	A274 (W)	WB	650	700	950	500
2	A229 (N)	SB	2350	2400	2350	2050
	A229 (N)	NB	1800	1700	1650	1750
3	A229 Loose Rd (N)	SB	1150	1500	1400	1500
	A229 Loose Rd (N)	NB	1450	1900	1750	1500
4	A20 London Road	EB	1350	1350	1350	1350
	A20 London Road	WB	1250	1300	1250	1150

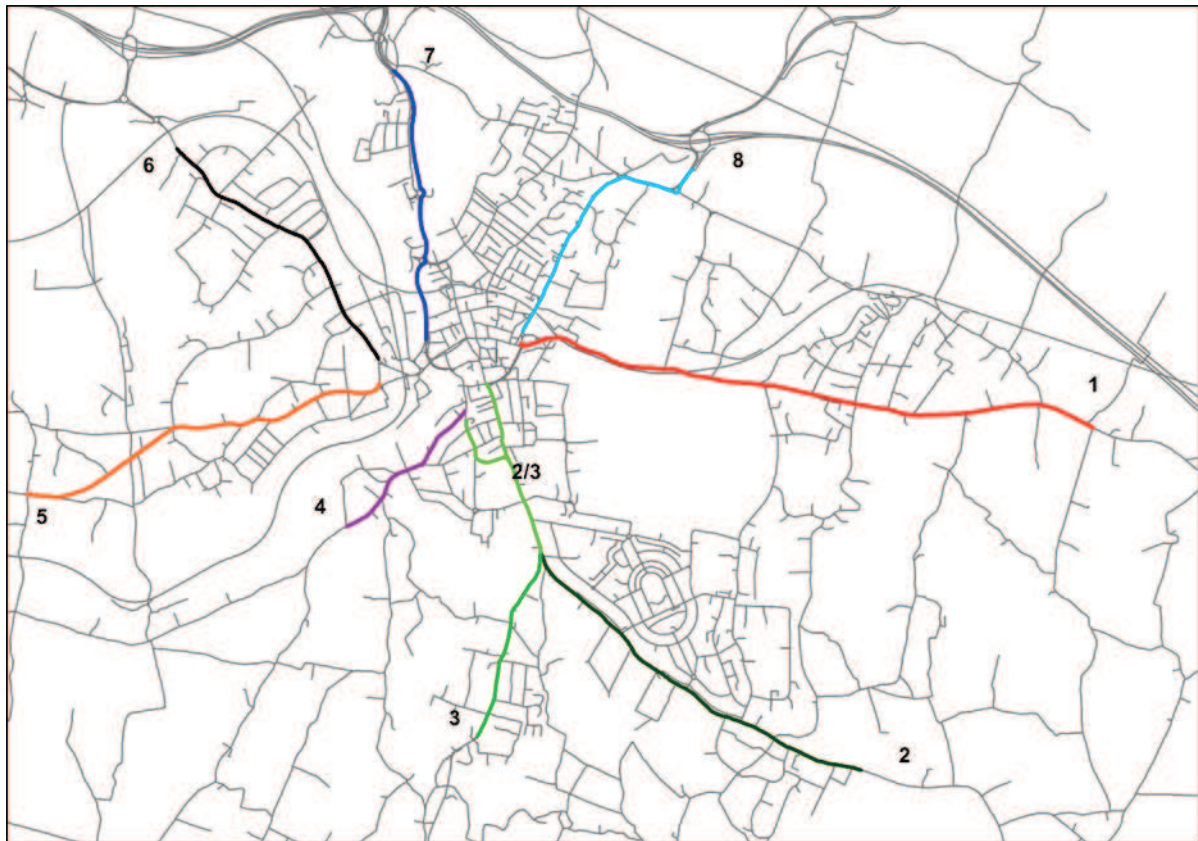
Site	Link	Dir	2014 Refresh	2031 DM	2031 DS1	2031 DS2
5	Hermitage Lane	NB	950	1150	1150	1100
	Hermitage Lane	SB	800	950	950	800
6	A26 Tonbridge Rd	EB	700	800	800	550
	A26 Tonbridge Rd	WB	650	750	700	800
7	A229 Linton Rd	SB	500	750	800	700
	A229 Linton Rd	NB	400	700	750	550
8	B2163 Lower St Leeds	NB	650	600	0	550
	B2163 Lower St Leeds	SB	500	500	50	550
9	A249	NB	1950	1850	2100	2050
	A249	SB	2100	2400	2450	3000
10	New Cut Rd	NB	800	850	1000	1050
	New Cut Rd	SB	950	900	900	1100
11	Willington St (N)	NB	1000	1150	1150	1050
	Willington St (N)	SB	750	900	850	800
12	M20 Spur Road	NB	1750	1950	2150	2150
	M20 Spur Road	SB	1650	1850	2100	2000
13	A20 Ashford Rd	EB	850	850	800	1000
	A20 Ashford Rd	WB	1250	1450	1500	1100
14	A249 Sittingbourne Rd	NB	950	1150	1000	950
	A249 Sittingbourne Rd	SB	600	800	650	450
15	B2163 (W)	EB	200	350	350	350
	B2163 (W)	WB	300	450	400	400

PM Link Flows

Site	Link	Dir	2014 Refresh	2031 DM	2031 DS1	2031 DS2
1	A274 (W)	EB	550	750	1000	650
	A274 (W)	WB	400	650	900	600
2	A229 (N)	SB	2000	2000	1900	1800
	A229 (N)	NB	2000	2050	2100	2050
3	A229 Loose Rd (N)	SB	1450	1700	1600	1600
	A229 Loose Rd (N)	NB	1200	1550	1400	1300
4	A20 London Road	EB	1050	1000	1050	900
	A20 London Road	WB	1300	1400	1300	1450
5	Hermitage Lane	NB	950	1200	1250	1100
	Hermitage Lane	SB	600	900	900	800
6	A26 Tonbridge Rd	EB	600	600	650	550
	A26 Tonbridge Rd	WB	500	700	700	600
7	A229 Linton Rd	SB	400	700	700	600
	A229 Linton Rd	NB	450	700	750	600
8	B2163 Lower St Leeds	NB	550	600	0	550
	B2163 Lower St Leeds	SB	550	550	50	550
9	A249	NB	2050	2200	2250	2700
	A249	SB	1750	1700	1600	2050
10	New Cut Rd	NB	850	800	750	800
	New Cut Rd	SB	1100	1250	1300	1300
11	Willington St (N)	NB	900	1100	900	1050
	Willington St (N)	SB	800	900	850	900
12	M20 Spur Road	NB	1550	1800	2100	2000
	M20 Spur Road	SB	1850	2250	2350	1950
13	A20 Ashford Rd	EB	1050	1250	1200	1200
	A20 Ashford Rd	WB	1000	1200	1050	1050
14	A249 Sittingbourne Rd	NB	650	750	800	750

Site	Link	Dir	2014 Refresh	2031 DM	2031 DS1	2031 DS2
	A249 Sittingbourne Rd	SB	500	650	500	500
15	B2163 (W)	EB	350	350	350	350
	B2163 (W)	WB	250	400	400	400

Travel Time Routes



Route	AM Inbound	Distance (miles)	2014 Refresh	2031 DM	2031 DS1	2031 DS2
1	A20 Ashford Road	3.0	10.3	13.7	11.5	9.5
2	A274 Sutton Road	3.0	12.3	15.6	14.4	12.6
3	A229 Loose Road	1.9	9.3	13.0	12.0	9.6
4	B2010 Farleigh Hill	0.9	2.8	2.8	2.8	2.8
5	A26 Tonbridge Road	2.0	7.2	7.7	7.6	7.2
6	A20 London Rd	1.6	6.6	7.1	6.9	5.8

Route	AM Inbound	Distance (miles)	2014 Refresh	2031 DM	2031 DS1	2031 DS2
7	A229 Royal Engineers Way	1.5	5.4	6.4	6.0	4.4
8	A249 Sittingbourne Rd	1.4	5.2	6.1	5.5	5.5

Route	AM Outbound	Distance (miles)	2014 Refresh	2031 DM	2031 DS1	2031 DS2
1	A20 Ashford Road	3.0	7.9	7.9	7.7	8.1
2	A274 Sutton Road	3.0	10.0	11.5	10.5	10.8
3	A229 Loose Road	1.9	7.6	9.5	8.8	8.8
4	B2010 Farleigh Hill	0.9	3.5	4.1	4.1	3.8
5	A26 Tonbridge Road	2.0	6.5	6.7	6.7	6.5
6	A20 London Rd	1.6	6.3	7.0	6.6	6.5
7	A229 Royal Engineers Way	1.5	4.4	5.6	5.7	5.6
8	A249 Sittingbourne Rd	1.4	5.9	6.7	6.2	6.1

Route	PM Inbound	Distance (miles)	2014 Refresh	2031 DM	2031 DS1	2031 DS2
1	A20 Ashford Road	3.0	8.9	9.9	9.1	9.0
2	A274 Sutton Road	3.0	11.2	12.9	12.5	12.3
3	A229 Loose Road	1.9	6.5	9.0	8.5	8.0
4	B2010 Farleigh Hill	0.9	2.7	2.7	2.7	2.7
5	A26 Tonbridge Road	2.0	7.1	6.8	6.9	7.3
6	A20 London Rd	1.6	6.1	5.8	6.6	5.8
7	A229 Royal Engineers Way	1.5	4.3	6.2	5.2	4.4
8	A249 Sittingbourne Rd	1.4	4.6	4.9	5.2	5.6

Route	PM Outbound	Distance (miles)	2014 Refresh	2031 DM	2031 DS1	2031 DS2
1	A20 Ashford Road	3.0	8.3	9.2	8.8	8.3
2	A274 Sutton Road	3.0	10.7	12.6	12.1	11.1
3	A229 Loose Road	1.9	8.5	11.9	12.3	10.2
4	B2010 Farleigh Hill	0.9	3.4	5.5	5.5	4.1
5	A26 Tonbridge Road	2.0	6.4	6.5	6.5	6.5
6	A20 London Rd	1.6	5.6	6.1	5.8	5.6
7	A229 Royal Engineers Way	1.5	5.2	7.5	7.3	7.0
8	A249 Sittingbourne Rd	1.4	5.6	6.6	5.5	5.7



Forecasting Report – Non-technical Summary Maidstone VISUM Transport Model

CO04300370/001 Revision 02

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1 Background

1.1 Introduction

Amey has been commissioned by Kent County Council (KCC) and Maidstone Borough Council (MBC) to provide transport modelling support to assess the traffic impact of Local Plan options for Maidstone District.

The commission involves the use of the existing Maidstone VISUM model which was developed by Jacobs on behalf of KCC and MBC. The model is to be used to assess the impact of the forecast demand for travel by car, commercial vehicle, bus and rail with alternative development and transport infrastructure options.

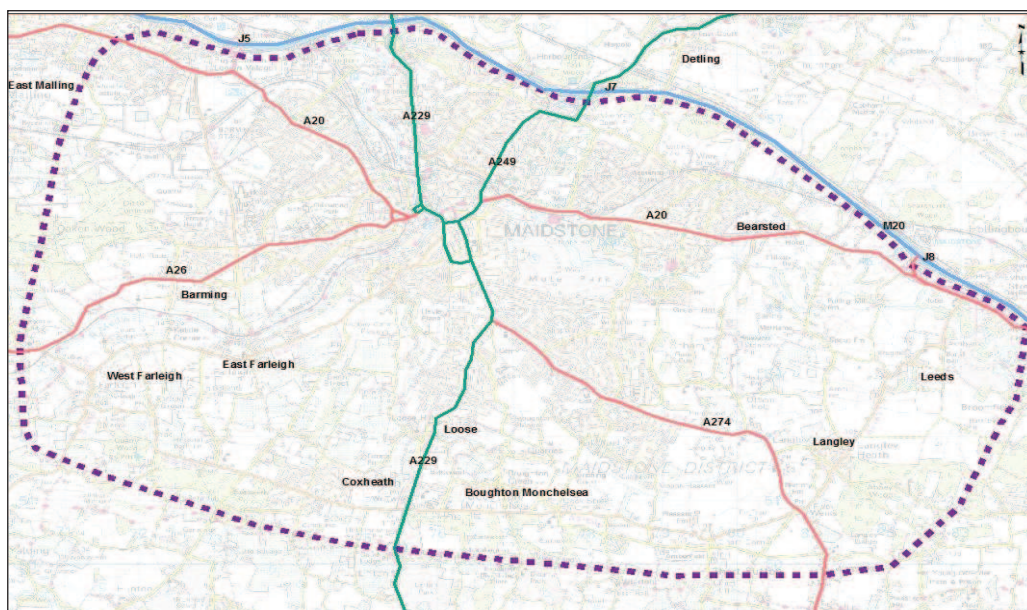
This note is intended to provide a non-technical summary of the model process and headline outputs.

1.2 Existing VISUM Model

The Maidstone VISUM model was originally developed in 2007 to assist in the development of the Local Development Framework (LDF) and to assess the transport impacts of future developments in Maidstone District.

The detailed modelled area encompasses the urban area of Maidstone District and includes the M20 corridor to the north of the town. The wider network, modelled in less detail, extends to include all the major approaches to the town.

Figure 1.1: Detailed Model Area Plan



1.3 2014 Model

Due to the age of the existing base model the first step was to develop an updated version to represent a 2014 baseline and to provide a reasonable reflection of the travel pattern in and through the town. In summary the following updates were made to the 2014 model:

- All land use changes between the base year 2007 and 2014;
- All known changes to transport infrastructure, specifically:
 - New signals at the junction of Cripple Street with A229 Loose Road;
 - Access to Sittingbourne Road Park & Ride site including traffic signals;
 - Access to new hospital site adjacent to Newnham Court on Bearsted Road;
 - Updated bus services; and
 - 2007 Bus fares and car parking charges adjusted to reflect current costs.

A high level sense check of the model performance was then carried out using available count and journey time data. Following this review it was considered that the 2014 AM and PM models provide a reasonable representation of the current travel conditions within Maidstone.

2 Forecast Model Scenarios

2.1 Model Scenarios

Three forecast scenarios have been assessed for the year 2031 which represents the end of the Local Plan period. The forecast scenarios tested have been labelled as below:

- 2031 Do Minimum (DM) - committed transport schemes only;
- 2031 Do Something 1 (DS1) - package of highway capacity improvements incl. Leeds/Langley bypass;
- 2031 Do Something 2 (DS2) - package of transport measure incl. both highway capacity and sustainable travel improvements;

2.2 Model Inputs

Forecast Development Data

All of the 2031 forecast model scenarios developed and summarised within this report include the same development assumptions based on forecast housing, employment and retail land-use data provided by MBC, as set out in **Error! Reference source not found.** below.

Table 2-1 – Forecast Development Quantum

Development Type	Forecast Development 2014 - 2031
Houses	17,381 units
Employment land	151,000 m ²
Retail use	12,100 m ²

Transport Interventions

A summary of the various transport interventions incorporated into each of the forecast model scenarios is provided in Table 2-2 below.

Table 2-2: Summary of Transport Interventions

	Transport Improvement	Description	2031 DM	2031 DS1	2031 DS2
1	Bridges Gyratory	New northbound link to bypass the gyratory	Yes	Yes	Yes
2	A20 / Coldharbour Lane Junction	Junction Capacity and signals – no change to M20 J5		Yes	Yes
3	A249 / Bearsted Rd roundabout	Junction improvements		Yes	Yes
4	Bearsted Rd / New Cut junction	Junction improvements		Yes	Yes
5	Dual carriageway between A249 and New Cut junctions	Increased capacity and junction arrangement		Yes	Yes
6	A20 Ashford Road / Willington Street	Junction capacity and signals arrangement		Yes	Yes
7	A229 / A274 Wheatsheaf Junction	Close exit to Cranbourne Avenue		Yes	Yes
8	A274 / Willington Street Junctions	Junction capacity improvements		Yes	Yes
9	A274 / Wallis Avenue Junction	Junction capacity improvements		Yes	Yes
10	A26 Fountain Lane Junction	Changes to accommodate right turn vehicles within the junction		Yes	Yes
11	Leeds Langley Relief Road	New route linking the A274 and the A20 and including improvements to the A274. Single carriageway with roundabouts at each end and replacing the 5 Wents junction. Existing B2163 closed south of Horseshoes Lane		Yes	
12	PR Fare	£3.00 Park and Ride cost in the P&R mode choice process			Yes
13	New PR service from Linton corner	New service with 15 minute frequency assumed			Yes
14	Existing PR bus services	15 minute frequency assumed for existing PR			Yes
15	M20 Junction 7 improvement	Signals on M20 eastbound approach and A249 approaches to the roundabout			Yes

	Transport Improvement	Description	2031 DM	2031 DS1	2031 DS2
16	New Cut / A20 left turn slip	Junction expansion (for bus priority provision which is not modelled)			Yes
17	Hermitage Lane pedestrian signals	New pedestrian signals near vehicle access to Barming Station			Yes
18	New link between Gore Court Rd and Bicknor Wood	New link with priority junctions assumed at each end			Yes
19	Widening of Gore Court Road	Increased capacity on Gore Court Rd			Yes
20	Car parking charges	50% increase in parking charges applied			Yes
21	Notcutts shuttle bus	New shuttle bus route from Notcutts to the bus station with 20 minute frequency			Yes
22	Bus services	Bus services on main radial routes increased to 7 minute frequencies			Yes
23	Car sharing	Increase in car sharing by 5%.			Yes
24	Romney Place bus lane	Bus only lane from Lower Stone Street to Romney Place			Yes
25	Walking and cycling mode share	Reduction in home based car trips within the Maidstone urban area			Yes
26	Circular bus route to hospital	Linking town centre, Hermitage Lane, hospital, Howard Drive and London Rd			Yes

3 Forecast Scenario Outputs

3.1 Travel Demand

Travel demand represents the total number of person movements within the modelled area. The travel demand is mainly influenced by land-use (e.g. development growth); however, it can also be affected by proposed transport interventions. For example, as the transport model does not directly assess walking and cycling modes, proposed measures to increase walking/cycling mode shares are represented by a reduction in the overall trips by car.

The weekday AM and PM peak travel demand within each of the forecast scenarios is summarised in Table 3-1 below.

Table 3-1: Summary of Total Travel Demand (Person Trips)

Person Trips	2014	2031 DM	2031 DS1	2031 DS2
AM Peak	50300	58600	58600	56600
% difference from 2014		17%	17%	12%
% difference from 2031 DM			0%	-4%
PM Peak	44900	52800	52800	50800
% difference from 2014		18%	18%	13%
% difference from 2031 DM			0%	-4%

The 2031 Do Minimum models indicate an increase of 17- 18% in person trips compared with the 2014 AM and PM peaks respectively. The total person trips remain the same for the 2031 DM and 2031 DS1 models.

The 2031 DS2 models incorporate changes to assumptions around the walking and cycling mode share. Consequently the travel demand in person trips is reduced by approximately 4% compared with the 2031 DM and 2031 DS1.

The travel demand on the network can also be represented in terms of the total number of vehicle trips on the network. This is summarised in Table 3-2 below.

Table 3-2: Summary of Total Travel Demand (Vehicle Trips)

Vehicle Trips	2014	2031 DM	2031 DS1	2031 DS2
AM Peak	35500	41500	41600	37700
% difference from 2014		17%	17%	6%
% difference from 2031 DM			<1%	-9%
PM Peak	32,000	38000	38100	34800
% difference from 2014		19%	19%	9%
% difference from 2031 DM			<1%	-8%

The 2031 Do Minimum models indicate an increase of 17- 19% in vehicle trips compared with the 2014 AM and PM peaks respectively. This amounts to approximately 6,000 additional vehicle trips on the highway network.

Highway changes incorporated into the 2031 DS1 models attract a small number of trips from public transport resulting in increase of <1% in the total vehicle trips compared with the 2031 DM models. This is also reflected in a slight change in the mode share (Table 3-3).

The transport interventions included in the 2031 DS2 model are focussed on public transport provisions together with car parking policy etc. The net impact of the reduced person trips and transport interventions is a much smaller increase in vehicle demand from 2014 of 6-9% (2200-2800 vehicles) in the AM and PM peaks respectively, significantly lower than for 2031 DS1. This again is reflected in a decrease in the mode share for cars and an increase in trips by public transport.

Table 3-3: Summary of Modal Splits

Mode	AM Peak			PM Peak		
	2031 DM	2031 DS1	2031 DS2	2031 DM	2031 DS1	2031 DS2
Cars (all purposes)	81%	82%	75%	84%	84%	79%
Bus	11%	10%	15%	8%	8%	11%
Rail	8%	8%	10%	8%	8%	10%

3.2 Network Performance

Data has been extracted from the models to provide an overall measure of the network performance for each scenario. The criteria used to gauge the efficiency of the highway network are:

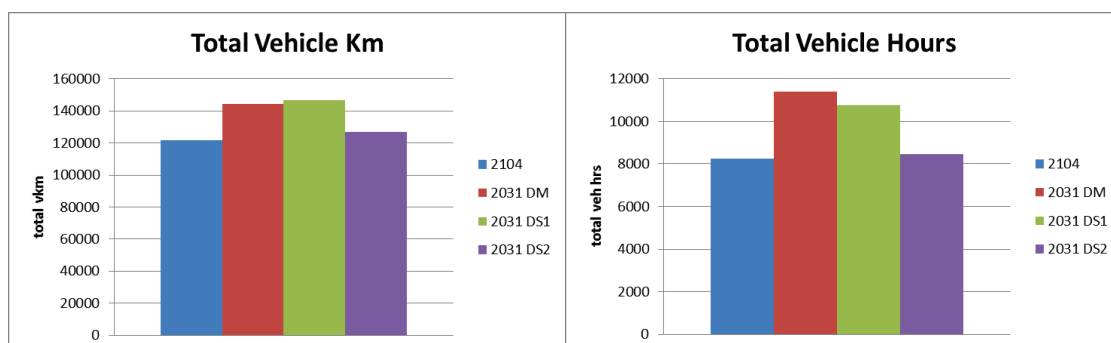
- Total travel distance;
- Total travel time.

A summary of the network performance in the Maidstone urban area within each of the modelled scenarios is shown in Table 3-4 and illustrated in Figure 3.1 for the AM peak only.

Table 3-4: Summary of Network Performance

	AM Peak			PM Peak		
	2031 DM	2031 DS1	2031 DS2	2031 DM	2031 DS1	2031 DS2
Travel distance (veh km)	144500	146700	126900	137500	140200	125700
% diff from 2014	18%	20%	4%	21%	24%	11%
Travel time (veh hrs)	11400	10800	8500	10000	9500	8100
% diff from 2014	38%	30%	3%	42%	35%	15%

Figure 3.1: Summary of Network Performance (AM Peak)



Higher values for the total travel distance within the forecast models reflect the increase in vehicles on the network and may also indicate that vehicles are taking longer routes to reach their destination, avoiding more congested shorter routes.

The reduced total travel time for 2031 DS1 compared to the 2031 DM reflects the benefits of the provision of the Leeds Langley Bypass which offers a faster route option. However the total travel distance is only marginally changed as traffic may opt to travel further but quicker on the new route.

The 2031 DS2 model has a reduced total vehicle travel distance and vehicle travel time compared with the 2031 DS1. This is the net impact of a reduction in travel demand, due to assumptions around walking and cycling, and an increase in travel by public transport in response to changes to car parking costs and increased bus services.

3.3 Link Flows

A selection of representative link flows have been extracted from the models to provide a comparison of the level of traffic flows on the main arterial routes in/out of Maidstone. The comparisons are shown in Figure 3.2 and Figure 3.3.

Figure 3.2: Comparison of Link Flows – AM Peak (Two-way)

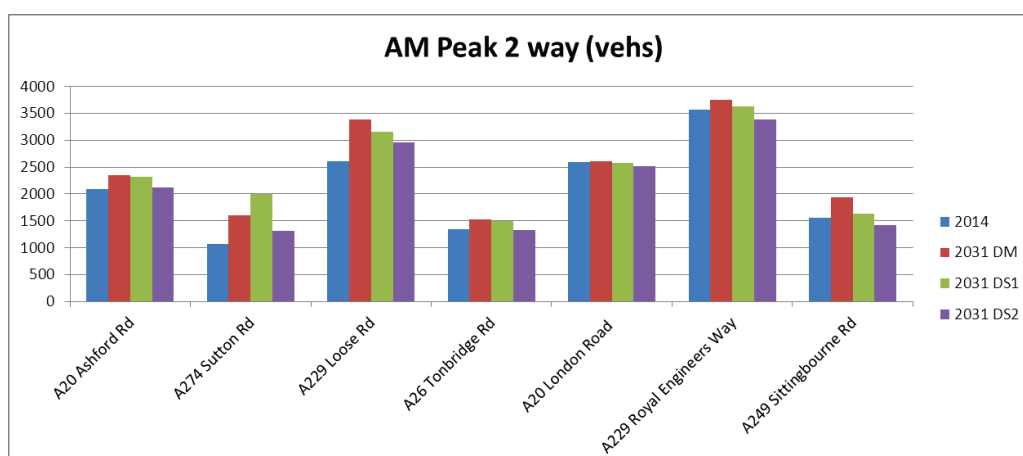
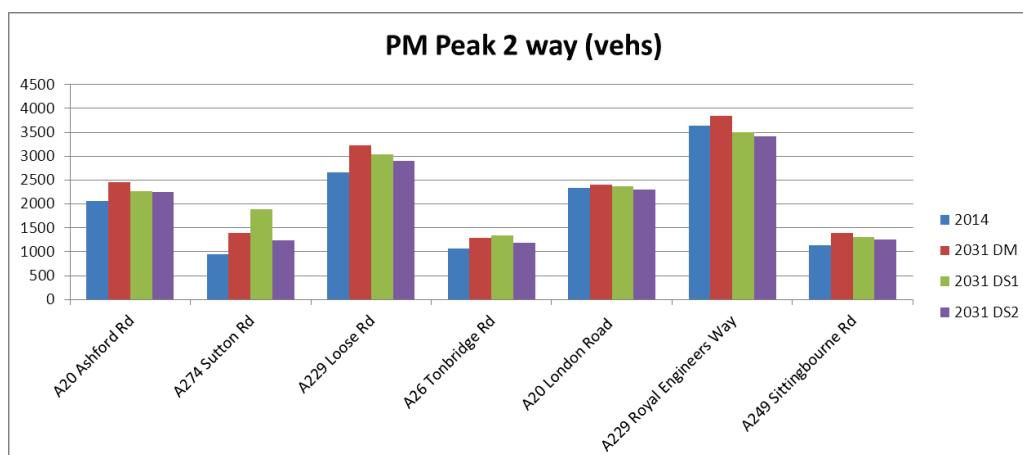


Figure 3.3: Comparison of Link Flows – PM Peak (Two-way)



The above graphs indicate that the 2031 DM scenario would result in a significant increase in traffic flows in both the AM and PM peaks on the main routes in/out of the town compared with current traffic levels.

Both of the 2031 Do Something scenarios modelled indicate a reduction in traffic flows on the selected links compared to the 2031 DM model. The 2031 DS2 scenario with the reduced vehicle demand generally demonstrates a lower level of traffic when compared with the 2031 DS1 scenario.

3.4 Travel Times

The travel times on the radial routes provide an indication of the performance of different parts of the network. Travel times on the key radial routes have been extracted for each of the models, for the AM and PM peaks. The routes selected are shown in Figure 3.4 and the journey times are summarised in Figure 3.5 - Figure 3.8.

Figure 3.4: Journey Time Route Locations Plan

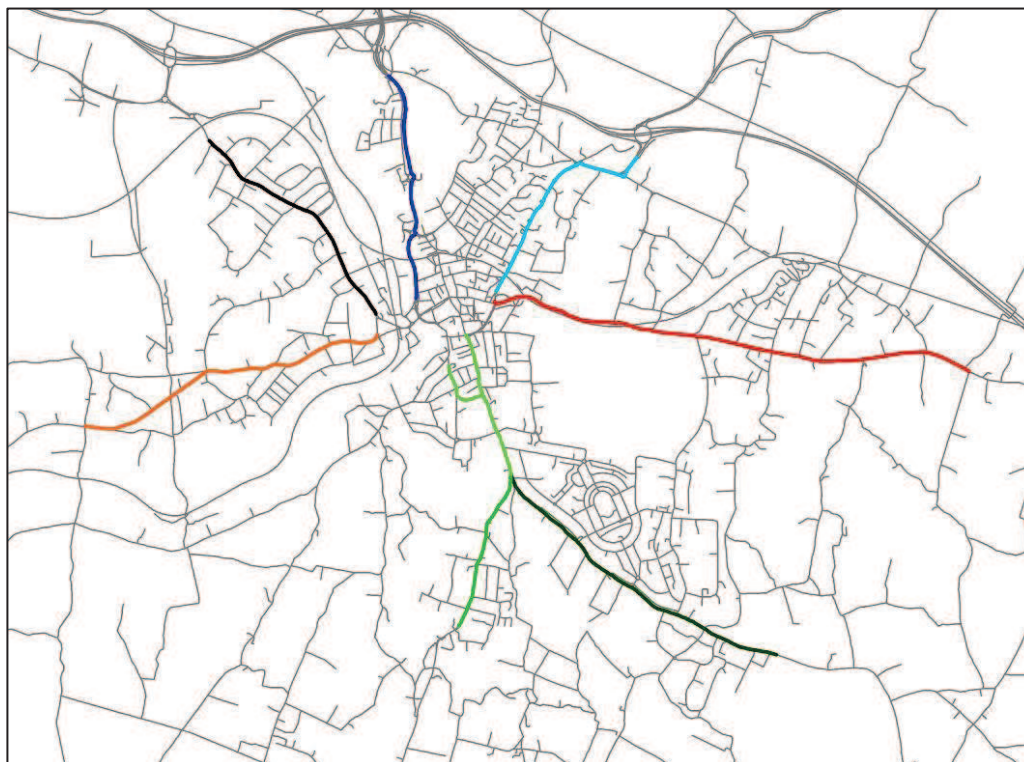


Figure 3.5: Comparison of Journey Times - AM Peak Inbound

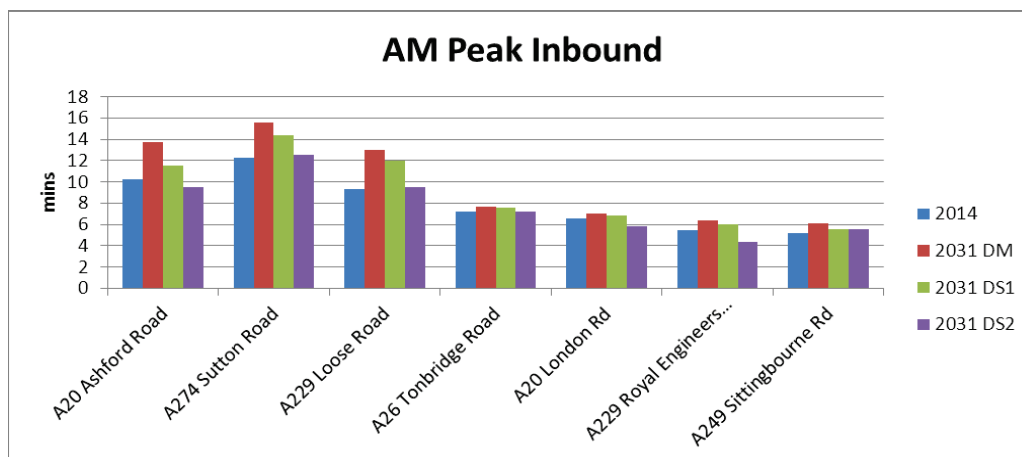


Figure 3.6: Comparison of Journey Times - AM Peak Outbound

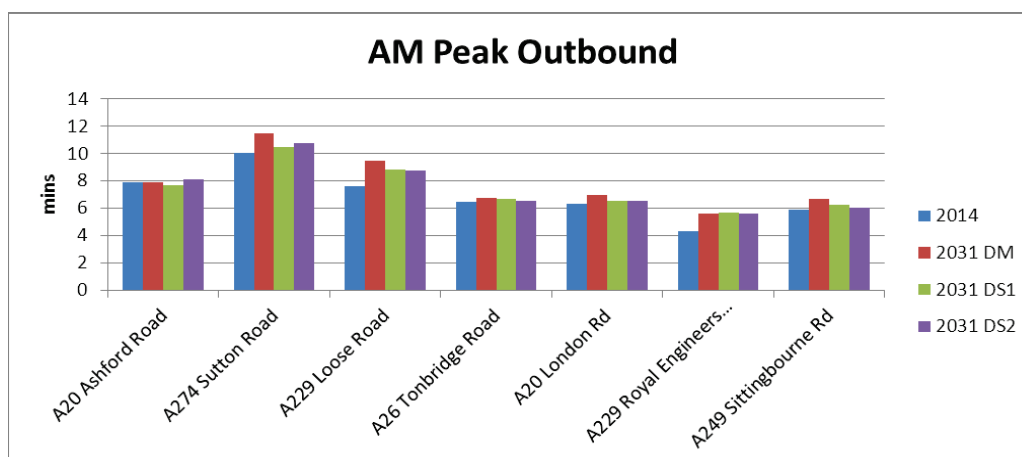


Figure 3.7: Comparison of Journey Times - PM Peak Inbound

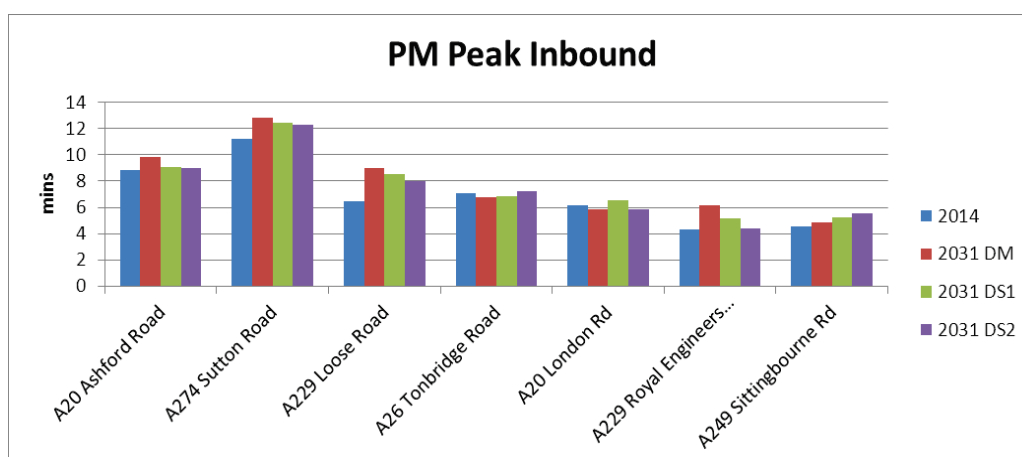
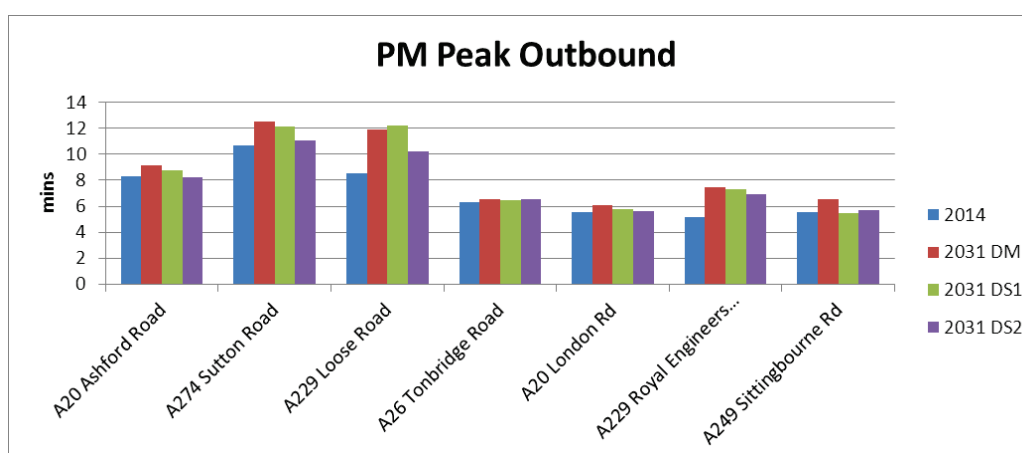


Figure 3.8: Comparison of Journey Times - PM Peak Outbound



The above graphs indicate a general pattern whereby both the 2031 DS1 and 2031 DS2 scenarios would observe a decrease in peak hour travel times on the main routes in/out of Maidstone when compared with the 2031 DM scenario.

The 2031 DS1 model has the most impact on travel times on routes to the east and south of the town. The 2031 DS2 model has a significantly lower demand than the 2031 DS1 model and generally shows a reduction in travel time compared with the 2031 DS1 scenario. However some routes show a slightly increased travel time which is a reflection of a change in travel patterns around the town.

3.5 Summary

The network is currently operating under stress during peak periods and movement on some of the key radial routes is constrained. The 2031 DM scenario presents a worst case scenario with the minimum intervention in terms of mitigating transport improvements envisaged. Although this situation is not expected to arise it provides a benchmark against which to gauge alternative scenarios.

Trips are assigned within the model to the shortest and quickest routes. As the pressures on the system change with the introduction of different measures, the route options for each trip changes and consequently the travel patterns around the town shift.

The outcome of a series of different interventions included in the do something models may not be immediately apparent from link flows or travel times on particular roads, as trips are assigned to alternative routes in response to delays. The individual link flows and indicative travel times therefore only provide part of the picture for the highway model. They should be weighed alongside wider network performance indicators and the level of demand assigned.

4 Concluding Comments

2031 Do Minimum

The 2031 DM provides a worst case scenario, giving an indication of the potential impact of the forecast development quantum on a largely unchanged network, apart from the Bridges Gyratory which is included in all the forecast models. The Bridges Gyratory scheme will provide some benefit for movements through the town from south to north.

In reality the 2031 Do minimum is an unlikely scenario as highway and public transport provision would be expected to evolve alongside development over time. It does, however, provide a useful benchmark against which to gauge the impact of alternative scenarios. In the absence of proactive measures to attract trips to sustainable modes an additional 6,000 vehicle trips will need to be accommodated on the highway network by 2031.

With no intervention other than the Bridge Gyratory improvement scheme the 2031 DM scenario demonstrates that there would be a significant increase in travel time and travel distance over current conditions. The increase in total travel time is a response to the additional demand on the network which generates more delay. The additional traffic and the diversion of traffic on longer routes around the town to avoid congestion contribute to the increase in the network total travel distance. The outputs suggest a significant increase in congestion and delay on the urban highway network when compared with 2014 baseline conditions.

2031 Do Something 1

The 2031 DS1 model is essentially a highway based scenario with the same forecast total travel demand as the 2031 DM model. This model is focussed largely on highway improvements at key junctions across the town and also on the provision of a Leeds/Langley bypass to the southeast of Maidstone. This scheme accounts for approximately 4km of a new major road, various link roads and a number of new junctions.

Compared to the 2031 DM model the 2031 DS1 model shows a small increase in total travel distance but a reduction in total travel time, suggesting a more efficient use of the network as a whole. The increase in travel distance is the net result of an element of traffic having the option of a longer but faster route. The knock-on effect of this will be the release of some capacity and the reassignment of an element of traffic that was diverting around the town in the 2031 DM, back to a shorter route through the town.

This scenario has limited impact on the mode of travel chosen.

Whilst the 2031 DS1 model outputs indicate some benefits to the southeast of the town near to the proposed Leeds/Langley bypass, the impact of the scheme alone cannot be separated from the rest of the highway package.

2031 DS2

The 2031 DS2 model includes a number of highway improvements across the town as well as a package of improvements to public transport, a new Park & Ride site at Linton Corner, increased parking charges and some fundamental changes to assumptions around car occupancy and the proportion of trips by walking or cycling modes.

The Maidstone model is essentially a highway based model which does not include walking and cycling modes of travel. Consequently the very broad assumptions proposed for growth around walking and cycling mode share have been reflected in the model by a simple reduction in home based car trips within the detailed modelled area.

The reduced trip demand, together with the attraction of trips to public transport, is reflected in a reduced number of vehicles on the network and consequently in a more moderate impact on the total travel time and travel distance compared with the 2031 DM and 2031 DS1.

Despite the more constrained demand, there are parts of the network where traffic flows and travel times increase.

Issues to be Considered

The 2031 DM model indicates that the network will have to cater for some 6,000 additional vehicle movements during the peak periods by 2031. In the absence of a specific package of transport interventions to manage this forecast demand there will be a significant increase in travel time and travel distance across the network.

Although the 2031 DS1 and DS2 models have some features in common, they present different approaches to the management of potential problems generated by the forecast development in and around Maidstone, as indicated in the 2031 DM model. Neither of the scenarios modelled may actually be achievable in reality, but they demonstrate the possibilities of different strategies.

The highways based transport strategy (2031 DS1) includes a major new extension to the network in the form of a Leeds/Langley bypass. This scenario caters for a similar number of vehicles on the network to the 2031 DM and has an increase in the vehicle distance but operates more efficiently in terms of travel time.

The 2031 DS2 scenario is based on a constrained trip generation (allowing for increased walking and cycling) and significant incentives for public transport. As a consequence this scenario handles a lower forecast traffic demand reflected in the lower travel distance and travel time outputs across the network.

It is important to note, however, that the model results should be regarded as indicative only as both of the 2031 Do Something scenarios modelled have some level of uncertainty regarding their achievability. These are summarised below:

- The key element of the 2031 DS1 model, in the form of the Leeds/Langley bypass, will need to be considered in terms of deliverability and a more detailed appraisal of the potential benefits that may be attributed to it.
- The aspirations for sustainable mode share and public transport provision included in the 2031 DS2 model are very ambitious and will need to be supported by a sense check on what is practical and achievable. In particular, the levels of mode shift from car to walking and cycling and also the increased level of car occupancy which have been pre-determined within the model will need to be sense checked against comparable case studies to ensure they are reasonable assumptions.

2031 DS1 Transport Interventions Summary

Transport Improvement	Description
Bridge Gyratory	New northbound link to bypass the gyratory
A20/Coldharbour Lane Junction	Junction capacity and signals- no change to M20 junction 5
A249/Bearsted Road Roundabout	Junction improvements
Bearsted Road/New Cut Junction	Junction improvements
Dual carriageway between A249 and New Cut junctions	Increased capacity and junction arrangements
A20 Ashford Road/Willington Street	Junction capacity and signals arrangement
A229/A274 Wheatsheaf junction	Close exit to Cranbourne Avenue
A274/Willington Street junctions	Junction capacity improvements
A274/Wallis Avenue junction	Junction capacity improvements
A26 Fountain Lane Junction	Changes to accommodate right turn vehicles within the junction
Leeds/Langley Relief Road	New route linking the A274 and the A20 and including improvements to the A274. Single carriageway with roundabouts at each end and replacing the 5 Wents junction. Existing B2163 closed south of Horseshoes Lane

Source: Table 8-1: Forecasting report Maidstone VISUM Transport Model: July 2015.

2031 DS2 Transport Interventions Summary

Transport Improvement	Description
Bridge Gyratory	New northbound link to bypass the gyratory
A20/Coldharbour Lane Junction	Junction capacity and signals- no change to M20 junction 5
A249/Bearsted Road Roundabout	Junction improvements
Bearsted Road/New Cut Junction	Junction improvements
Dual carriageway between A249 and New Cut junctions	Increased capacity and junction arrangements
A20 Ashford Road/Willington Street	Junction capacity and signals arrangement
A229/A274 Wheatsheaf junction	Close exit to Cranbourne Avenue
A274/Willington Street junctions	Junction capacity improvements
A274/Wallis Avenue junction	Junction capacity improvements
A26 Fountain Lane Junction	Changes to accommodate right turn vehicles within the junction
PR Fare	£3.00 Park and Ride parking cost
New PR service from Linton corner	New service with 15 minute frequency assumed
Existing PR bus services	15 minute frequency assumed for existing PR
M20 Junction 7 improvement	Signals on M20 eastbound approach and A249 approaches to the roundabout
New Cut / A20 left turn slip	Junction expansion to include left hand turn slip with give way at A20 (to allow for bus priority right hand turn lane). NB Bus priority not modelled.
Hermitage Lane pedestrian signals	New pedestrian signals near vehicle access to Barming Station
New link between Gore Court Rd and Bicknor Wood	New link with priority junctions assumed at each end
Widening of Gore Court Road	Increased capacity on Gore Court Rd
Car parking charges	50% increase in parking charges
Notcutts shuttle bus	New shuttle bus route from Notcutts to the bus station with 20 minute frequency
Bus services	Bus services on main radial routes increased to 7 minute frequencies
Car sharing	Increase in car sharing by 5%.
Romney Place bus lane	Bus only lane from Lower Stone Street to Romney Place
Walking mode share	Mode share target - 8.5% increase in walking mode share over 2014 base
Cycling mode share	Mode share target - 8.5% increase in cycling mode share over 2014 base
Circular bus route to hospital	Linking town centre, Hermitage Lane, the hospital, Howard Drive (via a bus only link) and London Rd

To : Maidstone Joint Transportation Board
By : Tim Read – KCC Head of Transportation
Date : 22nd July 2015
Subject : Results of the VISUM Transport Modelling
Classification: For Information and Discussion

Summary : A proposal that the DS3 modelling scenario is taken forward for the purposes of the Maidstone Local Plan.

1. Introduction

1.1 The VISUM modelling work undertaken in support of the emerging Local Plan has tested a series of options relating to the transport interventions that could be implemented alongside future housing and employment development. Each of the options is predicated on an individual set of assumptions regarding the package of transport interventions.

1.2 The transport interventions included within each option are:

- 2031 Do Minimum (DM) – a minimalist approach to transport whereby only the Bridge gyratory scheme is implemented;
- 2031 Do Something 1 (DS1) – a package of highway capacity improvements and provision of the Leeds-Langley Bypass (as identified at the JTB workshop in December 2014);
- 2031 Do Something 2 (DS2) – an expanded package of highway capacity improvements and range of sustainable travel initiatives including Linton Park & Ride, increased bus frequencies (to every 7 mins), a 50% uplift in town centre parking charges and 8.5% increase in walking/cycling.
- 2031 Do Something 3 (DS3) – the package of highway capacity improvements in DS2 plus the Leeds-Langley Bypass, increased bus frequencies (to every 10 mins) and a 50% uplift in town centre parking charges.

1.3 The model enables the relative effectiveness of each option to be compared and contrasted by providing a measure of their influence on future travel demand and highway network performance.

1.4 The purpose of this report is to ensure that Members are informed of the model findings associated with the DS3 option and how these compare against the other modelled options.

2. Background

2.1 The DS3 option has been tested to gain an understanding of whether model results comparable to those of DS2 could be achieved through a less ambitious set of assumptions relating to mode choice behaviour.

2.2 This approach acknowledges the imperative of a robust evidence base that provides a high degree of certainty in how new transport infrastructure and associated changes in travel patterns can be delivered.

2.3 The DS3 option includes targeted highway capacity improvements and measures that will encourage sustainable travel choices. It differs from DS2 by the inclusion of a bypass around Leeds and Langley and in how it alters aspirations surrounding walking, cycling and public transport in view of the high level of uncertainty over whether successful application can be achieved within the local context of Maidstone.

2.4 DS3 does not allow for a new park and ride service at Linton, given the lack of available evidence to prove its viability. It also adopts more conservative assumptions regarding bus frequencies on radial routes. The 7 minute frequency aspiration included in DS2 is high and more likely to be seen in a city such as London than a provincial town such as Maidstone. There are uncertainties over such frequencies could be sustained by future levels of patronage and whether the service operator would be able to secure the required vehicle fleet.

2.5 A 10 minute frequency on radial routes has been included in DS3 as it represents a more realistic reflection of the future service levels that are likely to be viable.

2.6 The assumed 8.5% increase in walking and cycling has been excluded from DS3 as this overestimates the level of behavioural change likely to arise as a result of investment in new infrastructure. Whilst demonstration towns such as Worcester, Darlington and Peterborough have experienced sizable increases in walking and cycling as a result of special government funding, they differ from Maidstone in having much lower levels of car ownership and more extensive dedicated networks. Although some change in travel habits could be achieved in Maidstone, it is unlikely it would be of the magnitude assumed in DS2.

2.7 The DS3 option has been tested alongside the other model options.

3. Results

3.1 The modelling results for the AM peak are summarised below:

	2014	2031 DM	2031 DS1	2031 DS2	2031 DS3
Person Trips	50,300	58,600	58,600	56,600	57,800
		+17%	+17%	+12%	+15%
Vehicle Trips	35,500	41,500	41,600	37,700	38,600
		+17%	+17%	+6%	+9%
Travel Distance (vehicle km)	122,000	144,500	146,700	126,900	135,500
		+18%	+20%	+4%	+11%
Travel Time (vehicle hours)	8,300	11,400	10,800	8,500	8,800
		+38%	+30%	+3%	+7%

3.2 The package of transport interventions associated with DS3 achieves a reduced impact on the highway network when compared against the DM and DS1 options.

3.3 The more conservative assumptions regarding travel behaviour in DS3 mean that it has a marginally less beneficial impact upon travel time than DS2, but is of a similar order.

3.3 The differential impacts should be viewed in the context of the comments made above regarding certainty of delivery and robustness.

4. Recommendations

4.1 Members are recommended to take forward the DS3 option, as this provides a package of highway and sustainable travel improvements that can be regarded as realistic and deliverable within the local context of Maidstone.

4.2 The DS3 option will therefore provide the most appropriate basis on which to accommodate the future traffic growth associated with planned new housing and employment development.

Contact Officers:

KCC : Tim Read , Brendan Wright – 03000 418181

Maidstone Borough Council
Strategic Planning, Sustainability and
Transport Committee meeting

18 August 2015

Urgent Update 1

Letter from Barbara Cooper, KCC dated
23 July 2015 (tabled as an Urgent Update at
the meeting of 23 July)

Letter in response from Alison Broom, MBC
dated 31 July 2015



Mrs. A Broom
Chief Executive
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**TO BE CIRCULATED TO ALL SPST
COMMITTEE MEMBERS**

**Growth, Environment
& Transport**

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Ask for: Barbara Cooper
Email: Barbara.cooper@kent.gov.uk

23rd July 2015

Dear Alison,

Re: Maidstone Borough Council Local Plan

Following the Joint Transportation Board last night, I write to set out the County Council's position concerning the re-consideration of sites previously excluded from the Local Plan by your SPST Committee. Please ensure this letter is read out and considered at their meeting tonight.

As some Members may be aware, the JTB unanimously agreed upon the principles to be taken forward in the development of the integrated transport strategy. It also recommended (to your SPST Committee) that further work be undertaken on cost, feasibility and sustainability so that an affordable package of measures can be prioritised within the available funding. In view of this, I must make it clear that **to allocate any further sites in the Borough at this point before this work is complete would be premature**. This work may identify constraints and opportunities which the Plan will need to consider to be found sound. The most acute example of this can be seen in south and south-east Maidstone where there is now compelling evidence to demonstrate that the area is constrained by lack of highway capacity. A potential solution may well be available through the provision of a link road around Leeds and Langley, but further work is required and provision remains uncertain. Identifying further growth in this area whilst this is the case is therefore premature, and it may prove necessary to revisit it at the Local Plan Review stage when alternative, better, smaller sites near the link road may well be identified as preferable locations.

In view of the above, the **County Council as Local Highway Authority strongly objects to the allocation of any further housing sites at this point, as to do so would cause an unacceptably severe impact on the public highway without there being sufficient certainty that mitigation can be provided and most importantly funded**. This position is consistent with our response to the Local Plan in March 2014.

From a planning perspective, Members of the Committee are no doubt fully aware of the relevant paragraph (47) from the National Planning Policy Framework. This states that local planning authorities should ensure that their Local Plan meets the full objectively assessed need for housing. However, the same paragraph makes it explicitly clear that this should only be done as far as it is consistent with the policies set out in the Framework which includes policies relating to transport (paragraphs 29-41). **There is no basis in law or policy to simply use the identified need as a housing requirement.** The policies in the Framework must be considered as a whole and proper planning constraints, i.e. the capacity of the local highway network, must be applied to any assessment of housing need. The Framework is clear that where the cumulative impacts of development are severe, further development should be prevented and refused (paragraph 32). The evidence base in this regard remains incomplete subject to the further work identified by Members of the JTB and therefore the recommendations made to this Committee are wholly premature.

Notwithstanding all of the above, KCC fully recognises the urgent requirement to progress the Local Plan and is keen to assist the Borough Council in developing a sound understanding of the infrastructure required to support growth, the mechanisms for delivery and identifying where funding gaps exist. Work will be undertaken in partnership at pace to establish the viability of the transport package and need take no longer than 12 weeks.

If you require further information or clarification on any matter then please do not hesitate to contact me.

Yours sincerely,



Barbara Cooper

Corporate Director – Growth, Environment and Transport

Cc. Mr. R Jarman, Head of Planning and Development, Maidstone Borough Council
All SPST Committee Members

Barbara Cooper
Corporate Director – Growth, Environment & Transportation
Kent County Council
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31 July 2015

Dear Barbara

Maidstone Borough Local Plan

Thank you for your letter dated 23 July 2015, setting out the County Council's position on the reconsideration of sites previously excluded from the emerging Maidstone Borough Local Plan. I can confirm that your letter was circulated to all members of the Strategic Planning, Sustainability and Transportation (SPS&T) Committee prior to the Committee's meeting on the same day.

The implications arising from the recommendations of the Joint Transportation Board (JTB) on 22 July will be considered by the SPS&T Committee on 18 August 2015, together with a Borough Council report on the results of the VISUM transport modelling.

As you are aware, the local plan is a key priority for the council, and taking a positive approach to its preparation is in the spirit of the National Planning Policy Framework against which the local plan will be assessed at independent examination. Significant progress has been achieved as the local plan moves towards Publication early next year, and it is crucial that this momentum is maintained, particularly in light of recent Government announcements.

As the local planning authority, the Council must aim to meet its objectively assessed need for housing and, given the borough's housing land supply position, the reconsideration of sites with a view to mitigating constraints is a key element of that work. On 23 July the SPS&T Committee gave consideration to sites that had been re-assessed by officers and, where it was considered that the identified constraints could not be overcome, sites were rejected by the Committee. However, where constraints could be mitigated, new sites were approved for further public consultation and re-instated sites were approved for inclusion in the Publication version of the local plan.

I note that the additional transport package referred to will take no longer than 12 weeks, so further mitigation measures that may be required for sites to progress, or in fact the identification of site constraints that cannot be addressed, can be incorporated into the local plan by Publication stage.

I would emphasise that at this stage the council will be inviting comments on key policy and site allocation changes during a further round of public consultation that is expected to commence late September, prior to Publication of the local plan in its entirety next year. The effectiveness of any proposed mitigation will of course be tested as part of the local plan examination and, ultimately, it will be for the Inspector to determine whether the local plan is sound.

Yours sincerely



Alison Broom
Chief Executive

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CC: All SPST Committee members
Rob Jarman, Head of Planning and Development

Maidstone Borough Council
Strategic Planning, Sustainability and
Transport Committee meeting
18 August 2015

Urgent Update 2

Letter from Barbara Cooper, KCC dated
13 August 2015 –plus enclosures:

- **Letter dated 21 July 2015 from the Secretary of State to the Chief Executive of the Planning Inspectorate**
- **Letter date 14 July 2014 from Barbara Cooper, KCC to the Leader of MBC, Councillor Mrs Wilson**
- **Maidstone Local Plan Option Testing: Do Something 3 Sensitivity Tests – Summary Technical Note, dated 11 August 2015**



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Email: Barbara.cooper@kent.gov.uk

13 August 2015

Our reference: GT/BC/JAC

Dear Alison

**Re: Maidstone Borough Council Strategic Planning, Sustainability and
Transportation Committee 18 August 2015**

I refer to the above meeting of the Strategic Planning, Sustainability and Transportation (SPST) Committee and wish to raise a number of issues for the Committee to consider. I request that this letter is circulated to all Members of the Committee prior to the meeting.

1. Recent Government announcements

I note that during the last SPST Committee meeting (23 July 2015) reference was made to the Written Statement made by the Minister of State for Housing and Planning (dated 21 July 2015). In particular reference was made to the likelihood of direct Government intervention in plan making where a local planning authority has not produced a Local Plan by "early 2017".

For the sake of completeness, Members should be made aware that this Written Statement also referred to a letter from the Secretary of State to the Chief Executive of the Planning Inspectorate (also dated 21 July 2015). In the interests of brevity I attach a copy to this letter but I would, at this point, like to draw Member's attention to the following:

"In order to maintain plan-making progress and to recognise the cost and time to a council prior to submitting a plan, it is critical that inspectors approach examination from the perspective of working pragmatically with councils towards achieving a sound Local Plan."

Evidence of "working pragmatically" is already apparent from the current examination of the Swale Borough Local Plan. As a neighbouring authority of Maidstone, I note that during the last SPST Committee meeting reference was made to the examination. For the avoidance of doubt Members should be aware that the appointed Inspector has not asked the Borough Council to withdraw the Local Plan. In taking a pragmatic approach, the Inspector has asked the Borough Council to undertake further assessments in relation to housing need and housing land supply following initial concerns raised. The hearing sessions were originally scheduled for September 2015 and have since been rescheduled to November 2015 – a relatively minor delay of less than three months in terms of the overall programme.

2. Local Highway network

It is clear from the July 2015 meetings of both the SPST Committee and the Joint Transportation Board (JTB) that the capacity of the local highway network to accommodate a level of housing growth aligned directly with the objectively assessed need for housing remains a major concern for Members of all parties as well as the businesses and residents within the Maidstone Borough.

I note that during the last SPST Committee meeting a number of comments were made regarding the position of Kent County Council (KCC) – as Local Highway Authority – on planning applications in the Maidstone Borough, particularly on sites in the south east of Maidstone.

The National Planning Policy Framework (NPPF) is a material consideration in determining planning applications. Paragraph 32 of the Framework states that plans and decisions should take account of whether:

- *"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;*
- *safe and suitable access to the site can be achieved for all people;*
- *and improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. **Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.**"*

This effectively prevents the County Council from objecting to planning applications unless there is clear and robust evidence to demonstrate a severe cumulative impact on the highway network. Such evidence has only recently become available following completion of the traffic modelling work undertaken by consultants Amey on behalf of both authorities in support of the Local Plan.

The modelling has identified how conditions on the highway network would be adversely affected by the cumulative impact of traffic associated with planned new development. In particular, routes within south east Maidstone, including the A229 and A274, have been shown to be highly susceptible to worsening levels of congestion.

This has been further evidenced through sensitivity testing to identify how an additional 2,250 houses in part of the town could influence network conditions under the DS3 scenario (thereby achieving an overall total of 18,500 houses that is comparable to the other modelling scenarios). These tests, which are presented in full in the note attached to this letter, identify how this change has a substantial bearing on the overall performance of the network as travel times would increase by a further 12% in the peak period. At the local level delays at the A229/A274 Wheatsheaf junction would be increased by a further 83%, although this increase could be reduced to 28% by the provision of a Leeds-Langley relief road.

The findings underline the importance of a deliverable transport strategy as a means of mitigating this impact.

Accordingly, the County Council – as Local Highway Authority – **strongly objects** to any further major development allocations (or speculative planning applications) on the southern approaches to Maidstone Town Centre (i.e. A229/ A274). This is on the basis that the cumulative impact of recently completed (or consented) development would have an unacceptably severe impact on the local highway network, without there being sufficient certainty that mitigation can be provided and, most importantly, funded. Any further development would therefore be wholly detrimental to local residents, the travelling public and the ability of Maidstone's economy to function effectively.

3. Leeds-Langley relief road

Members of the SPST Committee and the JTB are likely to be aware of the emerging proposals for a Leeds-Langley relief road. The principle of this scheme is well established via the policy (T18) in the adopted Maidstone Borough-Wide Local Plan 2000. The preamble to the policy states at paragraph 6.99, “... *the achievement of which the Borough Council rates as a high priority*”.

I set out the position of KCC on the relief road in a letter to the Chairman and Leader of the Council, Fran Wilson, dated 14 July 2015. In the interests of brevity I attach a copy to this letter but I would like to summarise the position for Members of the SPST Committee.

Clearly circumstances have changed since the adoption of the existing Local Plan for the Maidstone Borough. However the County Council strongly considers the delivery of a Leeds-Langley relief road to be a critical strategic infrastructure project for the plan period to 2031. It will deliver tangible benefits to the local highway network which has been demonstrated in the outputs of the transport modelling completed by consultants Amey who have briefed Officers and Members of both Authorities.

KCC, in partnership with Officers and Members of the Borough Council, would therefore like to prepare an appropriately worded policy which identifies an area on the Policies Map within which a route for a Leeds-Langley relief road and necessary enabling residential development is safeguarded. The precise route and development sites could be determined and allocated via a future Local Plan Review, the timing of which can be agreed but with an appropriate caveat that if need dictates, this date is brought forward. The County Council recognises that this

is an environmentally sensitive area and detailed mitigation issues can be comprehensively addressed as part of this process including the provision of significant strategic public open space and prevention of urban sprawl and settlement coalescence in this area of Maidstone.

The aforementioned letter from the Secretary of State to the Chief Executive of the Planning Inspectorate positively refers to the role of a review mechanism in Local Plans:

*"As inevitably a plan cannot exactly account for future circumstances there is a real value in getting a Local Plan in place at the soonest opportunity, even if it has some shortcomings which are not critical to the whole plan. We have acknowledged this in planning guidance by setting out **that Local Plans may be found sound conditional upon a review in whole or in part within five years of adoption.**"*

There are a number of Local Plans (i.e. Cherwell, North Warwickshire and Winchester) which have already been found sound by the Planning Inspectorate on the basis that there is an appropriate mechanism for a future early review. The Maidstone Borough Local Plan 2014 (Regulation 18) already includes a commitment to a review by 2021 (paragraph 1.3).

KCC realises that the preparation of such a policy will cause some concern regarding the timeliness of Local Plan preparation. However the County Council is willing to commit resources as necessary to develop a sound policy basis for the Leeds-Langley relief road within the emerging Local Plan.

4. Housing land supply

Prior to the last meeting of the SPST Committee an Urgent Update Report (dated 23 July 2015) was published which set out a breakdown of the housing land supply. Clearly the position has since changed following the latest decisions made by the Committee and it would therefore be helpful if the Borough Council could publish a detailed breakdown of the latest figures as soon as practicably possible.

I note that during the last SPST Committee meeting there was some concern expressed that the windfall allowance (114 dwellings per annum x 9 years) may have been calculated and applied conservatively to the housing trajectory. The County Council notes the view of the Borough Council that the rate of 'small' windfall site completions is expected to continue (i.e. at a rate of 45 dwellings per annum). However KCC does express its concern that a discount rate of 50% has been applied to 'large' windfall sites without robust justification.

The justification provided in the Urgent Update Report is contradictory. The Borough Council's analysis of past completion rates has discounted large sites previously identified as part of the plan making process, i.e. those included in the Strategic Housing Land Availability Assessment (SHLAA). Any sites allocated in the Local Plan would have been identified in the SHLAA and therefore already discounted against any windfall allowance and so the Borough Council's assertion that there will be fewer large windfall sites due to Local Plan site allocations is not realistic and appears overly conservative.

KCC has not seen any evidence to suggest that there will be any material reduction in the availability of large windfall sites across the Maidstone Borough in the plan period and strongly urges the Borough Council to reassess this aspect of the windfall allowance.

5. Water and sewerage

I note that during a previous SPST Committee meeting (14 July 2015) reference was made to the emerging Water Supply and Drainage Infrastructure Study which the County Council has commissioned consultants Amey to undertake for the Maidstone Borough. The Study follows the previous appraisal (January 2014) by Amey of the Halcrow Water Cycle Study 2010 and remains incomplete as technical information requested from Southern Water has yet to be provided and is now overdue despite repeated chasing.

KCC acknowledges the views of both Southern Water and South East Water as statutory undertakers but regard must also be had to the concerns expressed by Members and the general public in terms of the capacity of the existing water and sewerage infrastructure to accommodate the level of growth proposed in the emerging Local Plan.

The County Council seeks full reassurance from the Borough Council that the technical solutions required to address the known limitations of the existing water and sewerage infrastructure have been identified and the impact on the viability and deliverability of the Local Plan has been robustly assessed.

6. Woodcut Farm, M20 Junction 8

I note that land at Woodcut Farm is now recommended as an employment land allocation under Policy EMP 1 of the emerging Local Plan.

KCC has consistently objected to major commercial development at M20 Junction 8 and therefore **strongly objects** to this recommendation. The Planning Inspector who recently dismissed the appeal proposals for major commercial development at Waterside Park clearly recognised the significant environmental harm that the proposals would cause, particularly on the setting of the Kent Downs Area of Outstanding Natural Beauty.

The NPPF plainly states (paragraph 14) that in plan making, Local Plans should meet objectively assessed needs unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. The County Council recognises the need for employment land but does **not** consider that this need outweighs the demonstrable environmental harm that would be caused by major commercial development in this highly sensitive location.

I reaffirm the continued willingness of the County Council to work with the Borough Council to establish consensus on the key strategic issues articulated in this letter which remain critical in terms of the justification for the emerging Local Plan development strategy.

If you require further information or clarification on any matter then please do not hesitate to contact me.

Yours sincerely,



Barbara Cooper

Corporate Director – Growth, Environment and Transport

Cc. Mr. R Jarman, Head of Planning and Development, Maidstone Borough Council

Encs:

1. Letter dated 21 July 2015 from the Secretary of State to the Chief Executive of the Planning Inspectorate.
2. Letter dated 14 July 2015 from Barbara Cooper, KCC, to the Chairman and Leader of Maidstone Borough Council, Fran Wilson.
3. Maidstone Local Plan Option Testing: Do Something 3 Sensitivity Tests – Summary Technical Note, dated 11 August 2015.



Department for
Communities and
Local Government

Simon Ridley
Chief Executive
The Planning Inspectorate
Temple Quay House
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Dear Simon,

Local Plans

Each local planning authority should produce a Local Plan for its area, and in doing so should proactively engage a wide section of the community so that Local Plans, as far as possible, reflect a collective vision for areas. The Government accords great importance to authorities getting up-to-date Local Plans in place and to supporting them in doing so as a priority.

We have recently seen significant positive plan-making progress: 82% of authorities have now published Local Plans and 64% adopted Plans compared with 32% and 17% in May 2010 respectively. It is imperative that this positive progress is maintained, and the Government is open to taking further measures to achieve this if needed.

As inevitably a plan cannot exactly account for future circumstances there is a real value in getting a Local Plan in place at the soonest opportunity, even if it has some shortcomings which are not critical to the whole plan. We have acknowledged this in planning guidance by setting out that Local Plans may be found sound conditional upon a review in whole or in part within five years of adoption.

The Planning Inspectorate plays an important role in examining plans impartially and publicly to ensure that they are legally compliant and sound, and many inspectors have already demonstrated commendable pragmatism and flexibility at examination to enable councils to get plans in place. I have, however, seen recent examples where councils are being advised to withdraw plans without being given the option to undertake further work to address shortcomings identified at examination.

In order to maintain plan-making progress and to recognise the cost and time to a council prior to submitting a plan, it is critical that inspectors approach examination from the perspective of working pragmatically with councils towards achieving a sound Local Plan. We will shortly make a Ministerial Statement on this issue, including the importance of inspectors

highlighting significant issues to councils very early on, and of giving councils full opportunity to address issues.

I will also clarify how early review may be used as a way of ensuring that a Local Plan is not unnecessarily delayed by seeking to resolve matters which are not critical to the plan's soundness or legal compliance as a whole. In this context I would highlight a recent note published by the Planning Advisory Service which highlights where a commitment to early review has featured in recently adopted Local Plans (http://www.pas.gov.uk/web/pas1/local-planning/-/journal_content/56/332612/7399006/ARTICLE.)

Please can you ensure that inspectors are aware of the Government's position, and that you update your procedural guidance and support to inspectors so that all Local Plan examinations take full account of this letter.

THE RT HON GREG CLARK MP



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14 July 2015

Dear Fran,

**Re: Maidstone Borough Council Strategic Planning, Sustainability and Transport
Committee 14 July 2015**

Thank you for taking the time to meet with Officers and Members of Kent County Council (KCC) today.

I write to reaffirm the continued willingness of the County Council to work with Maidstone Borough Council (MBC) to establish consensus regarding key issues which will provide the basis for the preparation of a sound Local Plan.

It is of significant concern to KCC that the emerging Local Plan does not include any policy basis for the delivery of a Leeds-Langley relief road. The principle of this scheme is well established via the policy (T18) in the adopted Maidstone Borough-Wide Local Plan 2000. The preamble to the policy states at paragraph 6.99, "... the achievement of which the Borough Council rates as a high priority".

Clearly circumstances have changed since the adoption of the existing Local Plan for the Maidstone Borough. However the County Council – as Local Highway Authority – strongly considers the delivery of a Leeds-Langley relief road to be a critical strategic infrastructure project for the plan period to 2031. It will deliver tangible benefits to the local highway network which has been demonstrated in the outputs of the transport modelling completed by consultants Amey who have recently briefed Officers and Members of both Authorities.

KCC, in partnership with Officers and Members of the Borough Council, would therefore like to prepare an appropriately worded policy which identifies an area on the Policies Map within which a route for a Leeds-Langley relief road and necessary enabling residential development is safeguarded. The precise route and development sites could be determined and allocated via a future Local Plan Review, the timing of which can be agreed but with an appropriate caveat that if need dictates, this date is brought forward. The County Council recognises that this is an environmentally sensitive area and

detailed mitigation issues can be comprehensively addressed as part of this process including the provision of significant strategic public open space and prevention of urban sprawl and settlement coalescence in this area of Maidstone.

KCC realises that the preparation of such a policy will provoke some concern regarding the timeliness of Local Plan preparation. However the County Council is willing to commit resources as necessary to develop a sound policy basis for the Leeds-Langley relief road. Furthermore as you rightly acknowledged at our meeting today, MBC and KCC will need to establish general consensus on the Integrated Transport Strategy (ITS) for the Maidstone Borough. A pragmatic approach to providing a deliverable set of transport solutions must be taken by both Authorities before the County Council will be able to formally support the ITS.

Finally I must emphasise that the recommendations made to the MBC Strategic Planning, Sustainability and Transport (SPST) Committee severely prejudice the efforts of both Authorities to establish unanimity on matters of strategic importance to the sustainable development of the Maidstone Borough. I therefore trust that we can work together on the proposed approach as set out in this letter in the interest of preparing a deliverable Local Plan which can be fully endorsed by both Authorities.

If you require further information or clarification on any matter then please do not hesitate to contact me.

Yours sincerely,

Barbara Cooper

Corporate Director – Growth, Environment and Transport

Cc Alison Broom, Chief Executive

Project:	Maidstone Local Plan Option Testing
Date:	11/08/15
Report By:	Originator: Margaret Nicholls Reviewed: S Whittaker Approved: S Whittaker
Reference:	CO04300370/TN01 Rev 00
Subject:	Do Something 3 Sensitivity Tests – Summary Technical Note

***It is important to note that the results of this assessment are indicative only, having been based on broad assumptions and not on a formal model run.**

2031 Do Something 3 Sensitivity Test (increased housing target of 18,500)

Previous model runs have been developed based upon alternative housing allocations and distributions with a range of different transport strategy options. The most recent modelled scenario 'Do Something 3' (DS3) includes 16,247 houses and a package of transport measures including a Leeds/Langley link road, increased bus service frequencies, and increased town centre long-term public parking costs.

The Local Plan housing target and allocations are under review and could potentially amount to approximately 18,500 new homes. Using the existing DS3 model scenario, two sensitivity tests have been carried out to provide an indicative basic assessment of the likely impact of an additional 2250 (approx.) homes in the south east of Maidstone, with and without the Leeds/Langley link road in place. It should be noted that the locations of the additional homes have had to be assumed for the purposes of this assessment, although they have been predominantly placed along the A229 and A274 corridors.

The assessment indicates that the increased housing target would be expected to generate approximately 1250 additional vehicle movements in a typical weekday AM peak. This additional vehicle demand would represent an increase of approximately 12% over 2014 levels and 3% more than the previous DS3 scenario, as shown in the table below.

Table 1: Total Vehicle Trips

AM Peak (vehicles)	2014	2031 DS1	2031 DS2	2031 DS3	2031 DS3 Sensitivity Tests
Vehicle Trips	35500	41600	37700	38600	39800
% diff from 2014		+17%	+6%	+9%	+12%

The impact of the additional vehicles would be expected to increase the overall network travel time by some 7% (630 vehicle hours) in the AM peak compared with DS3. Without the Leeds / Langley link in place the network travel time would increase by around 12% (1020 vehicle hours).

Table 2: Total Network Travel Time

AM Peak (total travel time)	2014	2031 DS1	2031 DS2	2031 DS3	2031 DS3 Sensitivity Tests	
					With LL link	Without LL link
Vehicle Hours	8300	10800	8500	8800	9500	9800
% diff from 2014		+30%	+3%	+7%	+14%	+19%

The additional housing in the vicinity of the A274 and A229 for the sensitivity test has the effect of increasing traffic movements on the A274, A229, B2163 and Willington Street. Two way traffic flows on the A274 would increase by around 140 vehicles (+14%) and on the B2163 Heath Road by around 100 vehicles (+21%) in the AM peak compared to DS3.

Without the Leeds / Langley link in place two way flows on Willington Street would increase by around 260 vehicles per hour (+29%). Flows on the A274, A229 and B2163 would increase by 17%, 13% and 27% respectively, compared to DS3.

Table 3: Two Way Link Flows

AM Peak (2 way vehicles)	2014	2031 DS1	2031 DS2	2031 DS3	2031 DS3 Sensitivity Tests	
					With LL link	Without LL link
A274 Sutton Road	1100	2000	1300	1200	1350	1400
% diff from 2014		87%	22%	15%	29%	33%
A229 Loose Rd	1700	2200	2000	2000	2100	2200
% diff from 2014		31%	17%	18%	24%	30%
B2163 Heath Rd	500	760	750	700	800	820
% diff from 2014		48%	44%	33%	54%	60%
Willington St	900	1000	1000	1000	1100	1200
% diff from 2014		12%	11%	8%	17%	37%

The A229 and A274 routes converge at the Wheatsheaf junction, where the total traffic inflow in 2014 was approximately 2900 vehicles in the AM peak hour. With the Leeds /Langley link in place, the DS3 Sensitivity Test indicates a 2% increase in traffic through the junction compared with DS3, with the effect of increasing delay through the junction by an extra 28%.

Without the Leeds/Langley link in place, the traffic through the junction would increase by a further 11% (to 3500 vehicle per hour). The increase in delay would be of the order of 83% more than that for the DS3 scenario.

Table 4: Wheatsheaf Junction Operation

AM Peak	2014	2031 DS1	2031 DS2	2031 DS3	2031 DS3 Sensitivity Tests	
					With LL link	Without LL link
Total inflow	2900	3500	3200	3200	3300	3500
% diff from 2014		22%	13%	12%	14%	23%
Delay (veh hours)	59	114	89	83	100	132
% diff from 2014		93%	51%	41%	69%	124%

Summary

The additional 2250 houses included in the sensitivity tests are represented by an increase of 1250 trips on the network during the AM peak, 3% more than for DS3.

The impact of the additional trips on the network is reflected by an increase in total network travel time of 7% (with Leeds/Langley link road) and 12% (without Leeds/Langley link road) compared with DS3.

The surrounding links most affected by the additional trips on the network are the A274, A229, B2163 and Willington Street. In particular, the A274 would observe an increase in two-way traffic flows of 14% (with Leeds/Langley link road) and 18% (without Leeds/Langley link road) compared with DS3. Willington Street would also observe significant increases in traffic flows of 9% (with Leeds/Langley link road) and 29% (without Leeds/Langley link road).

At the critical Wheatsheaf junction, which currently suffers from severe congestion, the sensitivity test indicates that the junction would observe an increase in delay in the AM peak of 28% (with Leeds/Langley link road) and 83% (without Leeds/Langley link road) compared with the DS3 scenario.

Maidstone Borough Council
Strategic Planning, Sustainability and
Transport Committee meeting

18 August 2015

Urgent Update 3

**Letter from Alison Broom, MBC dated
17 August 2015 in response to KCC letter
dated 13 August 2015 –plus enclosures:**

- **Extract from Maidstone Local Plan 2000 – saved
Policy T2**

Barbara Cooper
Corporate Director – Growth, Environment & Transportation
Kent County Council
Room 1.62
Sessions House
Maidstone
Kent
ME14 1XQ

BY EMAIL ONLY: barbara.cooper@kent.gov.uk

Date: 17 August 2015

Your ref: GT/BC/JAC

Dear Barbara

Maidstone Borough Local Plan – Strategic Planning, Sustainability and Transportation Committee – 18 August 2015

Thank you for your letter of 13 August 2015 setting out the County Council's position in advance of the meeting of the Council's Strategic Planning, Sustainability & Transportation (SPS&T) Committee on Tuesday 18 August 2015. I can confirm that your letter and the attachments that accompanied it will be circulated to all Members of the SPS&T Committee prior to the meeting on Tuesday along with this reply.

I would reiterate the comments set out in my letter of 31 July 2015 regarding the Local Plan being a key priority of the Borough Council and the need to maintain the significant progress that has been made towards publication in 2016 particularly in the light of recent Government announcements.

1. Recent Government Announcements

Your letter makes reference to a letter from the Secretary of State to the Chief Executive of the Planning Inspectorate (PINS) urging a pragmatic approach to the achievement of sound local plans. The Borough Council welcomes the Secretary of State's advice to PINs. However, the context for this correspondence is important; it largely relates to plans that have been submitted for examination, a point that has not yet been reached with the Maidstone Borough Local Plan. You have also made reference to the Swale Borough Local Plan (that was submitted in April 2015) and the fact that the Inspector has asked the Borough Council to undertake further assessments in relation to housing need and housing land supply in response to initial concerns raised and that you regard this as a pragmatic approach. Our approach is to ensure that a thorough Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Allocation Assessment (SHLAA) are undertaken prior to the examination process commencing so as to reduce the risk of delays.

The advice given to Members at the last SPS&T Committee meeting with regard to the need for local planning authorities to have produced a plan by early 2017 to avoid likely direct Government intervention remains valid and is important context for the preparation of the Maidstone Borough Local Plan. A key issue is getting to the stage where the Local Plan can be submitted. This will happen when the Borough Council, as the local planning authority, is as satisfied as it can be that what it has produced will stand up to examination and be found sound. It is at this point that the hoped for pragmatic approach to examination by the Inspectorate would follow.

2. Local Highway Network

In your letter you make reference to the transport considerations in the National Planning Policy Framework (NPPF), strategic highways modelling for Maidstone and specific highway infrastructure.

Taken in the round, I note that you have chosen to focus on the car based transport consequences and infrastructure systems. I would simply observe that the NPPF is clear that plans and decisions should not only examine the cumulative impacts of development but also take account of whether 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. I think it is questionable that this has in fact yet been fully considered by KCC.

Notwithstanding this I will respond to the points that you have made.

You have referenced the southern highway approaches to Maidstone Town Centre (A229 and A274) and state that the County Council as Local Highway Authority strongly objects to any further development allocations on these approaches to the Town Centre in the light of further modelling and sensitivity testing. You also refer to the Leeds-Langley relief road and the view that this infrastructure should be included in the draft Local Plan.

It is correct that the adopted Maidstone Borough-wide Local Plan (MBWLP) 2000 refers in Policy T18 to a Leeds-Langley bypass and indeed a route is indicated on the proposals map. The policy does however clearly refer to the scheme (alongside a number of others) being delivered within the plan-period i.e. the period to 2006. There is also clear reference in the supporting text to policy T18 of the 'draw' of Maidstone Town Centre as a destination and also associated intra-urban movement across Maidstone, hence the need to also consider movement patterns and encourage modal shift along the radial routes into the Town centre. Paragraph 6.86 of the explanatory text states for example;

'Survey work and land use projections have demonstrated an increasing demand for travel, and over 90% of this demand is for travel within and to the Maidstone Urban Area. Some 25% of this demand is for travel to the town centre. The Urban Transportation Strategy (UTS) for Maidstone seeks to limit the demand for car travel (by the management and the promotion of other modes of travel, especially the bus) in the short term but will not seek to curtail it.'

Reference is also made in paragraph 6.93 of the explanatory text in the MBWLP 2000 to corridor improvements envisaged by saved Policy T2 of the adopted Local Plan. The two go hand-in hand as part of a combined strategy for transport infrastructure. Both southern approach corridors to Maidstone Town Centre (the A229 and the A274) are designated under Policy T2 (which, together with its supporting text is attached for your information). A key point to note is the latter part of paragraph 6.26 through to the beginning of paragraph 6.28.

'...Research by the Highway Authority has shown that only 5-10% of traffic in Maidstone town is through traffic, and travel demand is primarily for journeys to the town centre and between one part of the town and another.

6.27. The bus is ideally suited to this latter role and, for the future, the increasing role of the bus will be crucial. However, due to congestion there is a need to aid bus access and service reliability as well as reduce bus journey times by bus priority measures. These can be achieved in a variety of ways, such as dedicated bus lanes, bus activated traffic signals or bus gates, etc. These measures can be enhanced by improved passenger access and waiting facilities (such as bus boarders to discourage illegal parking, and increased numbers of shelters) and travel information systems at stops and in the town centre. Through a public/private sector Quality Bus Partnership, co-operative working to integrate infrastructure with the bus operators' incoming generation of low floor easy access buses is being achieved.

6.28. The Borough Council and the Highway Authority have identified the main arterial routes as key in this process of bus service enhancement.'

Whilst therefore, the 2000 Local Plan proposed the Leeds-Langley bypass, significant improvement to the A274 as a transport corridor recognised within policy T2 is also required due to the fact that the vast majority of journeys are to and beyond the Town Centre but within the intra-urban area. This was identified in the 2000 Local Plan but has not been progressed.

This fact was again borne out in modelling work undertaken by JMP in 2012 and in the transport assessments which included detailed junction assessments for the five applications already approved along the A274 corridor, three sites of which are currently under construction. The DS2 VISUM modelling work most recently carried out also backs this up.

On this point, I note that the VISUM modelling (both DS1 and DS2) does appear to have taken into account the proposed emerging Local Plan policy H1 allocations in the SE of Maidstone as referenced in Appendix C of the July 2015 Forecasting Report. I am therefore concerned as to the seeming inclusion of a further 2500 houses (in unspecified locations) in the southern approach corridors (A229 and A274) and the assumptions behind this. Particularly, as the DS3 Sensitivity Testing Summary Technical note that accompanied your latest letter makes it clear that no further modelling has been undertaken and that the outcomes are based on broad assumptions. Furthermore, this work appears to ignore the fact that VISUM is a strategic level model not suited to detailed junction assessment. I am unclear as to how the conclusion that the A229 and A274 cannot accommodate any more traffic has therefore been reached.

Are you indicating that the A229 and A274 will be at 'gridlock' or that some or all of the junctions will be beyond their design capacities? What was/is the tipping point for this that has been identified and what is the level of severity? The conclusions as set out in your letter and the accompanying technical note cannot be justified in, my view, without detailed modelling being undertaken especially of affected junctions.

By way of contrast, detailed assessment was (as stated previously) undertaken as part of the consideration of the approved housing development schemes along the A274 corridor and detailed mitigation packages, identified in line with adopted MBWLP 2000 policy T2, have been secured through appropriate s106 contributions. There is no clear, evidenced, indication from the Highway Authority as to why these mitigation schemes secured in accordance with adopted development plan policy are not deliverable.

3. Leeds/Langley Bypass

With regard to a potential Leeds-Langley bypass as you are aware following consideration by the Maidstone Joint Transportation Board on 22 July 2015 Councillors resolved as follows;

'RESOLVED: *That this Board recommends to Kent County Council's Cabinet Member for Highways, Transportation and Waste and to Maidstone Borough Council's Strategic Planning, Sustainability and Transportation Committee that a combination of DS2 and DS3 form the basis of the Integrated Transport Strategy for Maidstone to underpin the Local Plan. This is with the exception of the following and subject to costing to ascertain affordability and the evaluation of feasibility, sustainability and deliverability:*

- *Additional North/South Park and Ride removed from DS2;*
- *All references to percentage targets removed from DS2;*
- *That it is specified that with reference to parking costs, it refers to long-term car parks;*
- *That frequent bus services are encouraged with appropriate junction improvements but at no detriment to existing traffic capacity.'*

The main uncertainty relates to the bypass element of the 'combined package'. As indicated earlier it is crucial that the Borough Council is in a position to publish its Local Plan in a timely manner. The County Council's suggestion is for a policy to be incorporated into the plan that identifies an area on the Proposals Map through which a road might be built and necessary enabling residential development safeguarded and for detailed route and allocations to be determined and allocated via a future Local Plan review.

The Borough Council has very severe concerns over this suggested approach. A broad indication of an area through which a road might be built and within which future housing development may take place would result in a great deal of uncertainty and would be likely to lead to significant further delay in the Local Plan process whilst options testing and Sustainability Appraisals are undertaken. It is the Borough Council's view that such an approach is unlikely to be considered sound by an Inspector at examination even at the preliminary discussions stage.

We have advised on several occasions that a more appropriate way forward in the Borough Council's view (and indeed, as you have indicated by reference to the early review of other Councils' plans in your letter) would be to 'signpost' the relief road in the explanatory text in the draft Local Plan as submitted, making it clear that it would be examined thoroughly and brought forward in a Local Plan review. This would allow all parties further time to make the appropriate assessments in terms of justification, costs, options for route alignment and sustainability appraisals etc. and yet provide an indication as to the future delivery of the road. More detailed aims/aspirations could, however, be set out contemporaneously in the Integrated Transport Strategy as this would not be subject to formal examination.

4. Housing Land Supply

With regard to housing supply and in particular the windfall allowance, the Borough Council is satisfied that it has adopted a reasonable and balanced approach that will stand-up to scrutiny at examination.

5. Water and Sewerage

In respect of water and sewage the Council is satisfied that in conjunction with the appropriate statutory undertakers, development criteria on individual sites will ensure appropriate infrastructure will be provided in parallel with new development coming forward which will enable mitigation of the new development.

6. Woodcut Farm, M20 Junction 8

The County Council's objections to a proposed employment land allocation under policy EMP1 at Woodcut Farm Hollingbourne/Thurnham have been stated previously and taken into account in preparation of our Committee reports. As stated at the beginning of this letter, they will be conveyed to the Committee Members prior to the meeting on Tuesday next. I can assure you that Officers undertook the necessary planning balance exercise required by the NPPF in reaching the recommendation to the SPS&T Committee that the site should be allocated.

Finally, I welcome the County Council's continued commitment to working with the Borough Council to seek to establish consensus on key strategic issues relating to the Maidstone Borough Local Plan and look forward to continuing dialogue with a view towards the publication of the Local Plan within the Borough Council's desired timeframe.

Yours sincerely



Alison Broom
Chief Executive

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Enc.

cc: All SPS&T Committee Members
Rob Jarman, Head of Planning & Development

manufacturing) should be located away from residential and congested central urban areas, but should have direct access to the local, rather than the trunk, network. The PPG also suggests that such forms of development should be encouraged to carry freight by rail or water, and so should be served (or have the potential to be served) by wharves or railway sidings. For employment uses generally it suggests that they should be located in urban areas in locations already well served, or with the clear potential to be well served, by public transport, and easily reached from local housing by cycling or walking.

- 6.22. In considering appropriate locations for office, retail, leisure, tourism, recreational, educational and other public facilities, the PPG advises that they should be directed to central locations or locations close to their clients (depending on the nature of the use) and locations well served, or with the potential to be well served, by public transport and easily reached from local housing by cycling or on foot. The Council has sought to follow this guidance in its allocations. Housing should be concentrated into urban areas where it is, or can be, easily accessible to facilities (such as local shops, schools, workplaces, places of worship, entertainment, etc) and to a range of transport provision. Higher density residential development should be concentrated, according to PPG13, near public transport centres, or alongside corridors well served by public transport (or with the potential to be well served) and close to local facilities.
- 6.23. The County Council, as Highway Authority, and the Borough Council, as Local Planning Authority, have jointly developed an Integrated transportation strategy for the Borough. The objectives of this strategy will be pursued through this Local Plan. The objectives are:
- (i) encouragement of appropriate public transport provision and increased opportunities for cycling and pedestrians;
 - (ii) traffic management measures to reduce unnecessary use of the private car, and increase road safety;
 - (iii) a co-ordinated car parking strategy for urban Maidstone, including the provision of park-and-ride facilities, residents' preference parking, reduced central area long-stay parking, appropriate provision for long-stay parking on the edge of the town centre and enhanced short-stay parking provision in the central area;
 - (iv) appropriate new highway construction, where the environmental, highway safety and/or economic development benefits are significant; and
 - (v) action to assist easy, safe and dignified access by people with disabilities.
- 6.24. The policy below sets the context for all the detailed policies that follow. With an extra 10,000 dwellings to accommodate up to 2011, there is a need for active implementation of the strategy to contain demand for car travel.

POLICY 11 AN INTEGRATED TRANSPORT STRATEGY FOR MAIDSTONE WILL BE FOLLOWED BY THE BOROUGH AND COUNTY COUNCILS. ALL NEW DEVELOPMENT WILL REQUIRE TO BE SAFELY AND SECURELY RELATED EITHER TO EXISTING OR TO IMPROVED MOVEMENT NETWORKS AND THEY MAY BE PHASED SO THAT ANY NECESSARY WORKS AND OTHER FACILITIES ARE PUT IN PLACE AT THE APPROPRIATE TIME.

- 6.25. The chapter now proceeds in the order: public transport; cycling; walking; traffic management; parking (including park-and-ride); coach parking; highways construction; boat yards; Headcorn airfield; development control issues; provision for people with disabilities.

Public Transport

- 6.26. The average growth of traffic in Kent between 1980 and 1990 was 66%, compared with a national average growth rate of 49%. The present growth rate is still substantially higher than the national average. In the short-term the predicted growth rate has been assessed as 55%, whilst the medium-term rate would double traffic flows between 1991 and 2006 if unrestrained. Research by the Highway Authority has shown that only 5-10% of traffic in Maidstone town is through traffic, and travel demand is primarily for journeys to the town centre and between one part of the town and another.
- 6.27. The bus is ideally suited to this latter role and, for the future, the increasing role of the bus will be crucial. However, due to congestion there is a need to aid bus access and service reliability as well as reduce bus journey times by bus priority measures. These can be achieved in a variety of ways, such as dedicated bus lanes, bus activated traffic signals or bus gates, etc. These measures can be enhanced by improved passenger access and waiting facilities (such as bus boarders to discourage illegal parking, and increased numbers of shelters) and travel information systems at stops and in the town centre. Through a public/private sector Quality Bus Partnership, co-operative working to integrate infrastructure with the bus operators' incoming generation of low floor easy access buses is being achieved.
- 6.28. The Borough Council and the Highway Authority have identified the main arterial routes as key in this process of bus service enhancement. Particular priority will be afforded to park-and-ride corridors (see policy T17), as experience suggests that it is easier to entice car drivers onto buses for part of, rather than all of, their journey. It is equally appropriate to offer such facilities to hackney carriage users, as hackney carriages are also an important part of the public transport network, albeit a smaller scale and semi-private one, offering services particularly well suited to the needs of many people with disabilities as well as the able-bodied.

POLICY T2: WITHIN THE BUS AND HACKNEY CARRIAGE CORRIDORS, AS DEFINED ON THE PROPOSAL'S MAP, THE BOROUGH COUNCIL AND THE HIGHWAY AUTHORITY WILL DEVELOP PREFERENCE MEASURES TO AID BUS AND HACKNEY CARRIAGE ACCESS PARTICULARLY ON PARK-AND-RIDE ROUTES. SUCH MEASURES MAY INCLUDE:

- (1) DEDICATED BUS LANES INCLUDING CONTRA-FLOW LANES WHERE APPROPRIATE
- (2) PRIORITY TO BUSES AT JUNCTIONS
- (3) PRIORITISATION WITHIN TRAFFIC MANAGEMENT SCHEMES, AND/OR
- (4) ENHANCED WAITING AND ACCESS FACILITIES AND INFORMATION SYSTEMS FOR PASSENGERS INCLUDING PEOPLE WITH DISABILITIES

- 6.29. Many new development schemes have the opportunity to make a particular contribution towards offering the choice of energy-efficient and sustainable modes of transport, as required by PPG13 – "Transport". All major development proposals will inevitably be generators of inward movement. They should accordingly have appropriate provision in their design and layout for residents, employees, visitors, shoppers and others to make alternative transport choices. This will come about by offering attractive and accessible bus and taxi facilities, including convenient bus stops, waiting areas and shelters and ease of access on foot and by wheelchair from all parts of the development area in question.
- 6.30. Substantial new housing sites will additionally be generators of outward movement and should accordingly make provision, where this is physically possible, for either exclusive or priority direct access to or through them for public service vehicles. These vehicles will include buses (and possibly light rapid transport systems in the future). Their specific needs of access and movement should be taken into account in determining footways, pedestrian crossing points, speed restrictions, road widths, visibility distances, gradients and curvature.

POLICY T3 PLANNING PERMISSION WILL NOT BE GRANTED FOR MAJOR DEVELOPMENT PROPOSALS UNLESS ADEQUATE PROVISION IS MADE WHERE NECESSARY AND APPROPRIATE WITHIN THE OVERALL DESIGN AND SITE LAYOUT FOR THE FOLLOWING FACILITIES FOR PUBLIC TRANSPORT:

- (1) PRIORITY OR EXCLUSIVE PROVISION FOR PUBLIC SERVICE VEHICLE ACCESS TO OR THROUGH THE PROPOSED DEVELOPMENT AREA AND
- (2) SAFE AND CONVENIENT PASSENGER WAITING ACCOMMODATION, INFORMATION SYSTEMS AND SIGNED PEDESTRIAN ACCESS ROUTES AND
- (3) SUITABLE PROVISION FOR DISABLED ACCESS TO THE WAITING ACCOMMODATION FROM ALL PARTS OF THE DEVELOPMENT AREA

Railways

- 6.31. The Borough Council has been pursuing improved railway services for the area over a number of years. In 1988, as noted, the service frequency from Maidstone East to London was doubled (to two an hour) for the first time in 18 years, and was further improved in 1989 to three per hour. New trains to modern standards are intended to be provided and all the present passenger railway stock should have been replaced by 2010 by the latest. There have been, and there should continue to be, improvements to the number of journeys, the length of journey times and to the level of passenger comforts, in the years to come. The Borough Council will continue to press for, and monitor, such changes.
- 6.32. If rail is to play its full role as an alternative to the private car, as suggested by PPG13, facilities at stations need to be improved in terms of both passenger safety and comfort, given that many stations are now unmanned for all or part of the day and shelters tend to be reduced to basic facilities. The demolition of the station buildings at Maidstone Barracks station in 1991 was a retrograde step in this regard. Car parking facilities at stations, as well as 'kiss-and-ride' dropping off provision, can often be inadequate and cause highways or environmental problems. Bearsted Station is a particular, and long standing, problem in this regard which the Borough and Parish Councils will continue to press Railtrack and Connex South Eastern to resolve. Interchange between rail and other public transport modes should also be enhanced across the Borough.
- 6.33. Although not considered appropriate at the present time in connection with any of the major development allocations made in this Plan, the Borough Council will carefully monitor the potential for new passenger rail stations in the Borough. Raising levels of awareness of the potential of the rail network for local commuting and shopping trips is important, although this is not a land use issue and is being tackled through the Maidstone UTS.

POLICY T4 THE BOROUGH COUNCIL WILL PERMIT NEW AND IMPROVED RAIL-RELATED AND OTHER FACILITIES AT RAILWAY STATIONS WHERE THESE WOULD IMPROVE THE SAFETY AND CONVENIENCE OF EXISTING RAIL USERS ARRIVING OR DEPARTING FROM THE STATIONS BY ALL MODES OF PUBLIC OR PERSONAL TRANSPORT, AND WOULD GENERALLY FACILITATE THE GREATER OR MORE FREQUENT USE OF RAIL SERVICES. THE POTENTIAL FOR NEW RAILWAY STATION SITES TO INCLUDE INTERCHANGE PROVISION FOR A VARIETY OF MODES OF PASSENGER ACCESS AND FOR VEHICLE PARKING WILL CONTINUE TO BE EXPLORED.

Light Rail: Medway Metro

- 6.34. A County Council led investigation into improving services on the Medway Valley railway line between the Medway Towns and Maidstone has indicated that a growth in patronage can be

Hayley Bourner

From: theresa.warford@kent.gov.uk
Sent: 18 August 2015 15:54
To: Alison Broom
Cc: Rob Jarman
Subject: SPST Meeting - Transport Modelling Breifing Note for SPST 18 August Meeting
Attachments: SPST briefing note 18 08 15 v1.doc; CO04300370_TN01.docx; Printed minutes 22nd-Jul-2015 17.00 Maidstone Joint Transportation Board.pdf

SENT ON BEHALF OF BARBARA COOPER, CORPORATE DIRECTOR, GROWTH, ENVIRONMENT & TRANSPORT

Dear Alison,

Further to your letter dated 17th August, I realise that members and officers may benefit from a clearer interpretation of the transport modelling that was outlined in the annex of my previous letter. To that end, please find attached a briefing note which hopefully brings real clarity to the figures .

Best wishes
Barbara

For: Members of the Maidstone Borough Council Strategic Planning, Sustainability and Transportation Committee
Date: 18 August 2015
Subject: Maidstone Borough Local Highway Network
Priority: HIGH

Introduction

This briefing note amplifies the position of Kent County Council (KCC) on matters of significant strategic importance for the emerging Maidstone Borough Local Plan¹. It recognises the progress made by the Joint Transportation Board (JTB) and for absolute clarity, provides a summary of the latest transport sensitivity tests prepared by consultants Amey and the implications for plan making and decision taking.

Local Highway Network

The County Council – as Local Highway Authority – fully acknowledges the widespread major concern expressed by local residents, businesses and Elected Members of all parties regarding the impact of the Local Plan development strategy on the local highway network.

The latest set of recommendations to the Maidstone Borough Council (MBC) Strategic Planning, Sustainability and Transportation (SPS&T) Committee are made in the absence of an agreed Integrated Transport Strategy.

At the last meeting of the JTB Members resolved²:

“That this Board recommends to Kent County Council’s Cabinet Member for Highways, Transportation and Waste and to Maidstone Borough Council’s Strategic Planning, Sustainability and Transportation Committee that a combination of DS2 and DS3 form the basis of the Integrated Transport Strategy for Maidstone to underpin the Local Plan. This is with the exception of the following and subject to costing to ascertain affordability and the evaluation of feasibility, sustainability and deliverability:

- *Additional North/South Park and Ride removed from DS2;*
- *All references to percentage targets removed from DS2;*
- *That it is specified that with reference to parking costs, it refers to long-term car parks; and*

¹ It should be read in conjunction with the letter from Barbara Cooper, KCC, to Alison Broom, MBC, dated 13 August 2015.

² Maidstone Joint Transportation Board: minutes of the meeting held on Wednesday 22 July 2015. A copy of the minutes is appended to this briefing note.

- *That frequent bus services are encouraged with appropriate junction improvements but at no detriment to existing traffic capacity."*

The resolution is clear in stating that agreement of the ITS will be dependent on the findings of further work to clarify its affordability and deliverability. This work is currently being undertaken by KCC and will be reported at the next JTB meeting in October.

Sensitivity tests (August 2015)

The traffic modelling work undertaken by consultants Amey on behalf of both KCC and MBC has already assessed the following scenarios:

1. 2031 Do Minimum (DM)

- Original housing and employment allocations (17,381 homes)
- Maidstone Gyratory scheme only

2. 2031 Do Something 1 (DS1)

- Original housing and employment allocations (17,381 homes)
- Package of transport improvements
 - Highway capacity improvements
 - Leeds - Langley Link Road

3. 2031 Do Something 2 (DS2)

- Original housing and employment allocations (17,381 homes)
- Package of transport improvements
 - Highway capacity improvements
 - Public transport improvements
 - Increased walking and cycling
 - Increased parking costs

4. 2031 Do Something 3 (DS3)

- Revised housing and employment allocations (16,247 homes)
- Package of transport improvements
 - Highway capacity improvements
 - Leeds-Langley Link Road
 - Public transport improvements
 - Increased parking costs

The quantitative outputs of the modelling are summarised in the table overleaf (blue). Following the progress made by the JTB and in view of the time constraints between Committee dates, two sensitivity tests have been undertaken by Amey using the DS3 scenario to provide an indicative weekday morning peak hour assessment of an additional 2,250 homes in south east Maidstone, with and without the Leeds/Langley Link Road³. For comparison purposes, the outputs of the sensitivity tests are shown in red.

³ For completeness the technical note is appended to this briefing note.

Total Vehicle Trips			
AM Peak (vehicles)	2031 DS3	2031 DS3 Sensitivity Tests	
Vehicle Trips	38600	39800	
% diff from 2014	+9%	+12%	
Total Network Travel Time			
AM Peak (total travel time)	2031 DS3	2031 DS3 Sensitivity Tests	
		With LL link	Without LL link
Vehicle Hours	8800	9500	9800
% diff from 2014	+7%	+14%	+19%
Two Way Link Flows			
AM Peak (2 way vehicles)	2031 DS3	2031 DS3 Sensitivity Tests	
		With LL link	Without LL link
A274 Sutton Road	1200	1350	1400
% diff from 2014	15%	29%	33%
A229 Loose Rd	2000	2100	2200
% diff from 2014	18%	24%	30%
B2163 Heath Rd	700	800	820
% diff from 2014	33%	54%	60%
Willington St	1000	1100	1200
% diff from 2014	8%	17%	37%
Wheatsheaf Junction Operation			
AM Peak	2031 DS3	2031 DS3 Sensitivity Tests	
		With LL link	Without LL link
Total inflow	3200	3300	3500
% diff from 2014	12%	14%	23%
Delay (veh hours)	83	100	132
% diff from 2014	41%	69%	124%

A more detailed summary of the sensitivity tests is also provided overleaf:

1. Vehicle Trips

- The additional 2,250 homes would create an additional 1,250 vehicle trips
- The additional trips increase the impact by a further 3%
- This results in an overall cumulative change of 12% when compared against 2014 traffic levels

2. Network Travel Time

- Travel time provides an indication of network performance in how it quantifies vehicle hours on the network
- The additional 2,250 homes would increase network travel time by a further 12%, although this would be reduced to 7% if the Leeds/Langley Link Road is provided
- This results in an overall cumulative change of 19% when compared against 2014 network conditions, although this is reduced to 14% if the Leeds/Langley Link Road is provided.

3. Two-Way Link Flows

- Link flows provide an understanding of the change in traffic flows that could be expected to occur on individual roads, such as the A274 and Willington Street
- The additional 2,250 homes would increase traffic flows on the A274 by a further 18%, although this increase would be reduced to 14% if the Leeds/Langley Link Road is provided
- This results in an overall cumulative change of 33% when compared against 2014 traffic levels, although this is reduced to 29% if the Leeds/Langley Link Road is provided
- The additional 2,250 homes would increase traffic flows on Willington Street by a further 29%, although this increase would be reduced to 9% if the Leeds/Langley Link Road is provided
- This results in an overall cumulative change of 37% when compared against 2014 traffic levels, although this is reduced to 17% if the Leeds/Langley Link Road is provided

4. Wheatsheaf Junction

- The effects of the additional homes on traffic flow and delay at this junction were examined as it forms the point of convergence for the A229 and A274 routes in south east Maidstone
- The additional 2,250 homes would increase delays at the junction by 83%, although this increase would be reduced to 28% if the Leeds/Langley Link Road is provided
- This results in an overall cumulative change of 124% when compared against 2014 network conditions, although this reduced to 69% if the Leeds/Langley Link Road is provided

National Planning Policy Framework

The latest response from Maidstone Borough Council⁴ refers to the National Planning Policy Framework (NPPF). Paragraph 32 of the Framework states that plans and decisions should take account of whether:

⁴ See the letter from Alison Broom to Barbara Cooper dated 17 August 2015.

- *“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;*
- *safe and suitable access to the site can be achieved for all people;*
- *and improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.”*

The response from the Borough Council states in relation to sustainable transport modes (i.e. paragraph 32, bullet point one):

“I think it is questionable that this has in fact yet been fully considered by KCC”.

This has actually been considered by the JTB at its latest meeting (22 July 2015) and the minutes⁵ reflect this:

“It was clarified that, with reference to sustainable transport and achieving a modal shift in rural areas, the focus would be on Rural Service Centres that had train stations where cycling to the station could be encouraged, and car parks made larger at stations to allow a bus service to come in and out. This would achieve a modal shift. It was explained that commercial opportunities for bus companies lay with services provided for school children and commuters.

A consensus was reached by the Board on the following which formed the basis of its recommendation to the appropriate bodies at MBC and KCC for the Integrated Transport Strategy:

- *The importance of adhering to the Local Plan timetable;*
- *That references to ‘town centre parking charges’ be amended specifically to ‘long stay town centre parking charges’;*
- *Key junction and road capacity improvements were needed;*
- *The East/West Park and Ride Service should continue;*
- *Sustainable transport and modal shift were permissible but the options should not tie in to specific percentage targets; and*
- *Frequent bus services were encouraged with appropriate junction improvements but at no detriment to existing traffic capacity.”*

Other Matters

As noted in Alison Brooms’ letter of 17 August 2015 on behalf of MBC, the sensitivity tests do not represent an additional model run. They complement the work previously completed on DS3 by identifying how network conditions could be further affected by the full amount of housing being contemplated by MBC.

⁵ A copy of the minutes is appended to this briefing note.

The level of detail within the model enables the effects of new development on key road corridors within the urban area to be quantified in terms of traffic volumes and network performance. Individual roads within south east Maidstone have been specifically reviewed as part of the sensitivity testing, given that the previously completed modelling work had shown them to experience a significant worsening in operating conditions. The absence of detailed junction assessments does not undermine the validity of this exercise, given that use of the model outputs provide a robust basis for testing.

The sensitivity tests are consistent with the modelling results already presented to Members in how they demonstrate a severe worsening of congestion delays on this part of the network. This is due to there being insufficient highway capacity to cope with the additional traffic movements resulting from the planned new development.

The mitigation measures identified to support recently consented developments along the A274 are specific to those schemes. They have no bearing on the modelling findings which substantiate the KCC position that further development in this area cannot be accommodated without a severe impact in the absence of further mitigation provision.

Conclusion

In light of the latest sensitivity tests, the absence of an agreed Integrated Transport Strategy and major concerns regarding the capacity of the existing local highway network to accommodate further housing growth, the County Council in its capacity as Local Highway Authority **strongly objects** to any further major development allocations (or speculative planning applications) on the southern approaches to Maidstone Town Centre (i.e. A229/ A274).

This is on the basis that the cumulative impact of recently completed (or consented) development would have an unacceptably severe impact on the local highway network, without there being sufficient certainty that mitigation can be provided and, most importantly, funded.

Any further development would therefore be wholly detrimental to local residents, the travelling public and the ability of Maidstone's economy to function effectively.

Appendix 1: Maidstone Local Plan Option Testing - Do Something 3 Sensitivity Tests Summary Technical Note

Appendix 2: Maidstone Joint Transportation Board: minutes of the meeting held on Wednesday 22 July 2015

Project:	Maidstone Local Plan Option Testing
Date:	11/08/15
Report By:	Originator: Margaret Nicholls Reviewed: S Whittaker Approved: S Whittaker
Reference:	CO04300370/TN01 Rev 00
Subject:	Do Something 3 Sensitivity Tests – Summary Technical Note

***It is important to note that the results of this assessment are indicative only, having been based on broad assumptions and not on a formal model run.**

2031 Do Something 3 Sensitivity Test (increased housing target of 18,500)

Previous model runs have been developed based upon alternative housing allocations and distributions with a range of different transport strategy options. The most recent modelled scenario 'Do Something 3' (DS3) includes 16,247 houses and a package of transport measures including a Leeds/Langley link road, increased bus service frequencies, and increased town centre long-term public parking costs.

The Local Plan housing target and allocations are under review and could potentially amount to approximately 18,500 new homes. Using the existing DS3 model scenario, two sensitivity tests have been carried out to provide an indicative basic assessment of the likely impact of an additional 2250 (approx.) homes in the south east of Maidstone, with and without the Leeds/Langley link road in place. It should be noted that the locations of the additional homes have had to be assumed for the purposes of this assessment, although they have been predominantly placed along the A229 and A274 corridors.

The assessment indicates that the increased housing target would be expected to generate approximately 1250 additional vehicle movements in a typical weekday AM peak. This additional vehicle demand would represent an increase of approximately 12% over 2014 levels and 3% more than the previous DS3 scenario, as shown in the table below.

Table 1: Total Vehicle Trips

AM Peak (vehicles)	2014	2031 DS1	2031 DS2	2031 DS3	2031 DS3 Sensitivity Tests
Vehicle Trips	35500	41600	37700	38600	39800
% diff from 2014		+17%	+6%	+9%	+12%

The impact of the additional vehicles would be expected to increase the overall network travel time by some 7% (630 vehicle hours) in the AM peak compared with DS3. Without the Leeds / Langley link in place the network travel time would increase by around 12% (1020 vehicle hours).

Table 2: Total Network Travel Time

AM Peak (total travel time)	2014	2031 DS1	2031 DS2	2031 DS3	2031 DS3 Sensitivity Tests	
					With LL link	Without LL link
Vehicle Hours	8300	10800	8500	8800	9500	9800
% diff from 2014		+30%	+3%	+7%	+14%	+19%

The additional housing in the vicinity of the A274 and A229 for the sensitivity test has the effect of increasing traffic movements on the A274, A229, B2163 and Willington Street. Two way traffic flows on the A274 would increase by around 140 vehicles (+14%) and on the B2163 Heath Road by around 100 vehicles (+21%) in the AM peak compared to DS3.

Without the Leeds / Langley link in place two way flows on Willington Street would increase by around 260 vehicles per hour (+29%). Flows on the A274, A229 and B2163 would increase by 17%, 13% and 27% respectively, compared to DS3.

Table 3: Two Way Link Flows

AM Peak (2 way vehicles)	2014	2031 DS1	2031 DS2	2031 DS3	2031 DS3 Sensitivity Tests	
					With LL link	Without LL link
A274 Sutton Road	1100	2000	1300	1200	1350	1400
% diff from 2014		87%	22%	15%	29%	33%
A229 Loose Rd	1700	2200	2000	2000	2100	2200
% diff from 2014		31%	17%	18%	24%	30%
B2163 Heath Rd	500	760	750	700	800	820
% diff from 2014		48%	44%	33%	54%	60%
Willington St	900	1000	1000	1000	1100	1200
% diff from 2014		12%	11%	8%	17%	37%

The A229 and A274 routes converge at the Wheatsheaf junction, where the total traffic inflow in 2014 was approximately 2900 vehicles in the AM peak hour. With the Leeds /Langley link in place, the DS3 Sensitivity Test indicates a 2% increase in traffic through the junction compared with DS3, with the effect of increasing delay through the junction by an extra 28%.

Without the Leeds/Langley link in place, the traffic through the junction would increase by a further 11% (to 3500 vehicle per hour). The increase in delay would be of the order of 83% more than that for the DS3 scenario.

Table 4: Wheatsheaf Junction Operation

AM Peak	2014	2031 DS1	2031 DS2	2031 DS3	2031 DS3 Sensitivity Tests	
					With LL link	Without LL link
Total inflow	2900	3500	3200	3200	3300	3500
% diff from 2014		22%	13%	12%	14%	23%
Delay (veh hours)	59	114	89	83	100	132
% diff from 2014		93%	51%	41%	69%	124%

Summary

The additional 2250 houses included in the sensitivity tests are represented by an increase of 1250 trips on the network during the AM peak, 3% more than for DS3.

The impact of the additional trips on the network is reflected by an increase in total network travel time of 7% (with Leeds/Langley link road) and 12% (without Leeds/Langley link road) compared with DS3.

The surrounding links most affected by the additional trips on the network are the A274, A229, B2163 and Willington Street. In particular, the A274 would observe an increase in two-way traffic flows of 14% (with Leeds/Langley link road) and 18% (without Leeds/Langley link road) compared with DS3. Willington Street would also observe significant increases in traffic flows of 9% (with Leeds/Langley link road) and 29% (without Leeds/Langley link road).

At the critical Wheatsheaf junction, which currently suffers from severe congestion, the sensitivity test indicates that the junction would observe an increase in delay in the AM peak of 28% (with Leeds/Langley link road) and 83% (without Leeds/Langley link road) compared with the DS3 scenario.

MAIDSTONE BOROUGH COUNCIL

MAIDSTONE JOINT TRANSPORTATION BOARD

**MINUTES OF THE MEETING HELD ON WEDNESDAY 22 JULY
2015**

Present: Councillor Burton (Chairman), and
Councillors Mrs Blackmore, Burton, Carter, Clark,
Cooke, Cuming, Daley, English, Fort, Hotson,
Mrs Robertson, T Sams, Springett, Mrs Stockell,
Vizzard, Mrs Whittle, Willis and Mrs Wilson

Also Present: Councillors English, Mrs Gooch, Newton,
Mrs Ring, Mrs Robertson, and Sargent.

70. **APOLOGIES FOR ABSENCE**

It was noted that apologies for absence had been received from
Councillors Ash, Bird, Harwood and J.A. Wilson.

71. **NOTIFICATION OF SUBSTITUTE MEMBERS**

The following Substitute Members were noted:

Councillor Mrs Blackmore for Councillor JA Wilson
Councillor Mrs Springett for Councillor Ash
Councillor Mrs Wilson for Councillor Harwood

Councillor English informed the Chairman of his intention to substitute for
Councillor Willis at a later stage in the meeting.

72. **URGENT ITEMS**

The Chairman stated, that in his opinion, the following late enquiries
should be taken as Urgent Items, and verbal updates provided, due to the
length of time until the next meeting:

- An update on the Worcester Road Petition;
- The Bridge Gyrotory Widening Scheme;
- A letter from the residents of Shepway North Ward in relation to a
17 tonne HGV limit; and
- Urgent update report to item 10, Report of Head of Planning and
Development - Results of the VISUM Transport Modelling.

It was stated that verbal updates would be taken following Item 9,
Questions/Statements by members of the public.

73. NOTIFICATION OF VISITING MEMBERS

The following members were in attendance as observers and reserved the right to speak on any item on the agenda:

Councillor English,
Councillor Mrs Gooch,
Councillor Newton,
Councillor Mrs Ring,
Councillor Mrs Robertson, and
Councillor Sargent.

74. DISCLOSURES BY MEMBERS AND OFFICERS

There were no disclosures by members or officers.

75. DISCLOSURES OF LOBBYING

It was noted that all members of the Board had been lobbied on item 10, Report of Head of Planning and Development - Results of the VISUM Transport Modelling.

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

RESOLVED: That all items be taken in public as proposed.

77. MINUTES OF THE MEETING HELD ON 15 APRIL 2015

RESOLVED: That the minutes of the meeting held on 15 April 2015 be approved as a correct record and signed.

78. PETITIONS

Mrs Claire Brown presented the petition in the following terms:

We, the undersigned petitioners, and parents/governors of St Margaret's Collier Street School do hereby petition Kent County Council (KCC) to install adequate signage and road traffic calming measures to warn drivers of the presence of children crossing during school hours.

Parents, staff and governors are concerned about the number of speeding vehicles along Collier Street (B2612) and the junction with Green Lane, where the school is situated. There have been several near misses involving young children crossing the road to and from the car park during school hours. Adequate signage, reducing the speed limit, a zebra crossing and other appropriate traffic calming measures will help to address these issues and prevent a serious road traffic accident involving young children.

It was clarified during the course of the discussion that there had been no fatalities but a number of near misses had been recorded. Further funding

was sought in order to implement the measures suggested. The petition was given the full support of the Board.

RESOLVED: That the petition be accepted with the full support of the Board.

79. QUESTIONS/STATEMENTS BY MEMBERS OF THE PUBLIC

Ms Lizzie Hare asked the following question of the Committee:

I am aware of a disabled person with breathing difficulties affected by pollution in Hermitage Lane. The pollution is measured from the Wateringbury side of the Tonbridge Road and not Hermitage Lane where the problem is, why is this?

Steve Clarke, Principal Planning Officer, provided an initial response stating that Maidstone Borough Council (MBC) monitored pollution at the junction of Fountain Lane on Tonbridge Road as there was significant residential development near the highway, whereas Hermitage Lane currently had less residential development. As residential development came forward on Hermitage Lane monitoring points could be reassessed.

RESOLVED: That a report be brought to the Committee's next meeting by the Environmental Health Shared Services.

80. VERBAL UPDATES

Jeff Kitson, Parking Services Manager at MBC, provided the Board with an update on the Worcester Road petition. He informed the Board that all residents had been written to, and could confirm that there had been forty five replies. He reported a mixed response but the consensus was to keep verge parking in place. He confirmed that a formal response would be made to the petitioners.

Richard Emmett, the District Manager (Maidstone) KCC Highways, Transportation & Waste responded to an enquiry made on the Bridge Gyratory Widening Scheme, making the following points:

- The Maidstone Bridges Gyratory scheme formed part of the South East Local Partnership (SELEP) programme of works;
- KCC has been successful in securing funding to deliver the scheme in early 2016 combined with a sizeable investment from MBC;
- Engagement with local groups had commenced with a communications plan being developed with MBC;
- MBC were fully involved with the project and contributed to the scheme on a regular basis; and
- Further engagement would continue with the local community in the near future.

The following formed the progress update:

Outline Design	Completed May 2015
Detailed Design	On-going until September 2015
Tender process	October 2015 – December 2015
Contract award	January 2016
Vegetation Clearance	January 2016 – March 2016
Utility Pre-contract works	January 2016 – March 2016
Main contract works	May 2016 – September 2016

The following points were made during the course of the discussion

- MBC officers were consulted throughout the design process;
- The scheme sign off would be a joint process with MBC and KCC; and
- A report should be brought back to the Committee which made provisions for facilities for pedestrians and cyclists, planting to combat pollution and other associated improvements as part of the scheme.

The Chairman accepted a letter from the residents of Shepway North Ward in relation to Willington Street on behalf of the Board.

RESOLVED: That the updates be noted and a report on the Bridge Gyrotory Scheme be brought to the next available meeting.

81. AMENDMENT TO ORDER OF BUSINESS

RESOLVED: That item 10, Report of Head of Planning and Development - Results of the VISUM Transport Modelling, be taken as the last item on the agenda.

82. REPORT OF KCC HIGHWAYS, TRANSPORTATION AND WASTE - HIGHWAY WORKS PROGRAMME 2015/16

Michael Heath, KCC Traffic Engineer provided an overview of the Highway Works Programme 2015/16 report.

The report provided an update and summarised the following schemes that had been programmed for delivery in 2015/16:

Footway and Carriageway Improvement Schemes

- Drainage Repairs and Improvement; and
- Street Lighting.

Transport and Safety Schemes

- Casualty Reduction Measures; and

- Integrated Transport Schemes.

Developer Funder Works

- Bridge Works;
- Traffic Systems; and
- Combined Member Fund.

RESOLVED: That the report be noted.

83. REPORT OF KCC HEAD OF TRANSPORTATION - MARDEN PRIMARY SCHOOL

Michael Heath, KCC Traffic Engineer, provided an overview of the report into the recent incident at Marden Primary School which had been requested at the last meeting, including a progress report on Highways activities undertaken with regard to Marden Primary School.

It was highlighted during the course of the discussion that the timing of the crash, at approximately 7.36am, may have prevented a much more serious incident occurring. The proposed 20 mph speed limit was deemed sensible and its implementation supported by members.

RESOLVED: That the report be noted.

84. REPORT OF KCC HEAD OF TRANSPORTATION - PETITIONS REPORT - HEADCORN ROAD WEIGHT RESTRICTION

Michael Heath, KCC Traffic Engineer, provided an overview of the report which was to update the Board on the progress on a petition to introduce a 7.5t Weight Restriction on Headcorn Road. The report recommended that a Weight Restriction was not implemented given the good safety record and fact that HGV vehicles observed were legitimately accessing premises in the area.

It was highlighted by members during the course of the discussion that Headcorn Road was being used as a shortcut to the station as rail improvements were being made.

It was noted that there was an increase in traffic road users trying to avoid Operation Stack.

It was requested that a verbal update report on the lessons learned from the recent effect of Operation Stack be given at the next meeting.

RESOLVED: That

1. The report be noted; and
2. A verbal update be given at the next meeting on the lessons learned from Operation Stack.

85. REPORT OF KCC HEAD OF TRANSPORTATION - PETITIONS REPORT -
HERMITAGE LANE JUNCTION WITH FOUNTAIN LANE

Michael Heath, KCC Traffic Engineer, provided an overview of the report which was to update the Board on the progress of a petition in relation to increased development along the Hermitage Lane Corridor. The petition contained a number of elements relating to planning matters. The report presented dealt solely with the request for improved pedestrian crossing facilities at Hermitage Lane junction with Fountain Lane.

The report concluded that the safety of pedestrians at this busy junction had been raised many times; however solutions had not been possible within the existing infrastructure. An upgrade would be costly in terms of civil engineering and modelling.

It was confirmed that a bid for funding had been made through the Local Transport Plan to upgrade the crossing, replace the controller and improve pedestrian facilities.

The availability of S106 monies was considered during the course of the discussion and possible uses for it. It was confirmed by the Head of Planning and Development at MBC that a S106 officer and assistant had been appointed and Board members were welcome to access the information available via this means.

It was agreed that Ward Members should pursue individual matters outside the meeting.

RESOLVED: That the report be noted.

86. REPORT OF KCC HEAD OF TRANSPORTATION - PETITIONS REPORT -
LEAFY LANE

Michael Heath, KCC Traffic Engineer, provided an overview of the progress report on a petition to introduce a formal Zebra crossing at Leafy Lane.

Members heard that Leafy Lane was the sole means of access to Brunswick House Primary School. Problems occurred when parents parked on double yellow lines or the School's keep clear markings.

The School had taken steps to engage with parents, promoting safer parking practices and had a system in place to combat the issues.

The report concluded that a Zebra crossing was likely to be more respected than the existing yellow lines and a bid for funding from the Local Transport Plan budget had been submitted.

RESOLVED: That the report be noted.

87. REPORT OF KCC HEAD OF TRANSPORTATION, PETITIONS REPORT -
B2010 AND B2163 EAST AND WEST FARLEIGH

Michael Heath, KCC Traffic Engineer provided an overview of the progress report on a petition to reduce the existing speed limits on the B2010 and B2163 through East Farleigh and West Farleigh.

The Board had recommended that KCC implemented a 30mph speed limit for the B2010 and B2163 between the existing 30mph limit in East Farleigh and the start of the existing 30mph limit at Yalding.

It was reported that a pragmatic approach had been taken in moving this forward, with the lead petitioner contacting the Local Member for the area who had previously agreed to part fund the scheme from her combined Members Grant. The Cabinet Member for Highways had been consulted and agreed that statutory consultation should proceed. The speed limit would be advertised for consultation in line with the previously submitted report to the April meeting of the Board.

RESOLVED: That the report be noted.

88. ADJOURNMENT

The meeting was adjourned from 6.20pm to 6.32pm.

89. REPORT OF HEAD OF PLANNING AND DEVELOPMENT - RESULTS OF THE VISUM TRANSPORT MODELLING

Officers from MBC and KCC provided an overview of the results of the VISUM transport modelling report. The Board then considered a presentation from AMEY which set out three options that would form the basis of Maidstone's Integrated Transport Strategy. They considered Do Something 1, Do Something 2 and Do Something 3 (DS1, DS2 and DS3) and the correlation between housing targets against the three options

Councillor Mrs Ring, Visiting Member, addressed the Committee. She advocated the need for a relief road, citing traffic issues on Willington Street and Parkwood Estate roads. She voiced her reticence at encouraging a modal shift with elderly residents, explaining how walking and cycling presented a challenge for the aging population.

The Head of Planning and Development at MBC explained the emphasis placed on sustainable transport in National Planning Policy Framework (NPPF) guidance and how this would be taken into account when transport policies were considered by an Inspector.

Affordability and funding opportunities were considered as part of the discussion, particularly in relation to key junction and road capacity improvements and the inclusion of a new relief road subject to cost/benefit analysis and an environmental impact assessment.

Consideration was given to the following during the course of the discussion:

- A modal shift within urban areas. This was thought to be less achievable in rural areas; and
- The sustainability of the Park and Ride was considered in terms of the subsidy paid by the council, and conversely the option of replacement bus services that would be based on a commercial need, otherwise this too would incur a subsidy.

It was clarified that, with reference to sustainable transport and achieving a modal shift in rural areas, the focus would be on Rural Service Centres that had train stations where cycling to the station could be encouraged, and car parks made larger at stations to allow a bus service to come in and out. This would achieve a modal shift. It was explained that commercial opportunities for bus companies lay with services provided for school children and commuters.

A consensus was reached by the Board on the following which formed the basis of its recommendation to the appropriate bodies at MBC and KCC for the Integrated Transport Strategy:

- The importance of adhering to the Local Plan timetable;
- That references to 'town centre parking charges' be amended specifically to 'long stay town centre parking charges';
- Key junction and road capacity improvements were needed;
- The East/West Park and Ride Service should continue;
- Sustainable transport and modal shift were permissible but the options should not tie in to specific percentage targets; and
- Frequent bus services were encouraged with appropriate junction improvements but at no detriment to existing traffic capacity.

RESOLVED: That this Board recommends to Kent County Council's Cabinet Member for Highways, Transportation and Waste and to Maidstone Borough Council's Strategic Planning, Sustainability and Transportation Committee that a combination of DS2 and DS3 form the basis of the Integrated Transport Strategy for Maidstone to underpin the Local Plan. This is with the exception of the following and subject to costing to ascertain affordability and the evaluation of feasibility, sustainability and deliverability:

- Additional North/South Park and Ride removed from DS2;
- All references to percentage targets removed from DS2;
- That it is specified that with reference to parking costs, it refers to long-term car parks; and
- That frequent bus services are encouraged with appropriate junction improvements but at no detriment to existing traffic capacity.

90. DURATION OF MEETING

5.03pm to 8.55pm

Agenda Item 11

18th August 2015

Strategic Planning, Sustainability & Transport Committee

Is the final decision on the recommendations in this report to be made at this meeting?	Yes
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Maidstone Borough Local Plan – employment land allocations

Final Decision-Maker	Strategic Planning, Sustainability & Transport Committee
Lead Director or Head of Service	Rob Jarman, Head of Planning & Development
Lead Officer and Report Author	Sarah Anderton, Principal Planning Officer (Spatial Policy)
Classification	Non-exempt
Wards affected	All wards

This report makes the following recommendations to the final decision-maker:

1. That the officer responses to the representations submitted during public consultation on the draft Maidstone Borough Local Plan 2014 for Policy EMP1, set out in Appendix A be approved.
2. That the amendments to Policy EMP1 set out in Appendix D, for incorporation into the Regulation 19 version of the Maidstone Borough Local Plan be approved
3. That the site allocation policy and plan for Land at Woodcut Farm set out Appendices B and C be approved for Regulation 18 consultation

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 & Transport Committee	18th August 2015

Maidstone Borough Local Plan – employment land allocations

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 The draft Maidstone Borough Local Plan was approved by Cabinet for its first full stage of public consultation (Regulation 18) in February 2014. The public consultation took place between 21 March and 7 May 2014.
- 1.2 This report considers the representations made to the sites allocated under Policy EMP1 for B class development (offices (B1), industrial (B2) and warehousing (B8)). The mixed use allocations (Policy RMX1) are the subject of a separate report on this agenda having been deferred from consideration at both the 14th July and 23rd July meetings of this Committee.

2. INTRODUCTION AND BACKGROUND

- 2.1 Policy EMP1 of the draft Local Plan identifies four sites in the borough for office, industrial and/or warehousing development. The draft Local Plan (Regulation 18) sets out the specific development criteria and includes a site plan for each of the allocated sites.
- 2.2 The amount of B class employment land which is needed in the borough for the plan period is evidenced in the Economic Sensitivity Testing and Employment Land Forecast, 2014 (GVA). The draft Local Plan (Regulation 18) allocates 6 sites which will provide B class employment land; the 4 sites allocated in Policy EMP1 and 2 sites in the mixed use Policy RMX1. Omitting the Clockhouse Farm site (Policy RMX1(4)) where planning permission was recently granted for housing and a care home but no B class floorspace, the table below sets out how the allocated sites would contribute towards the evidenced quantitative need.

2.3

	Office	Industrial	Warehousing
Land/Floorspace Requirement 2014-31 (ha)	1.6	-3.9	1.3
<i>Equivalent Floorspace shown in italics (sqm)</i>	<i>24,000</i>	<i>-15,600</i>	<i>6,500</i>
Mote Road, Maidstone	8,000		
Land south of Claygate, Marden			6,800
Land at Wheelbarrow Estate, Marden			14,500
Barradale Farm, Headcorn			5,500

Syngenta		[8,640] ¹	
Total (sqm) in the draft Local Plan	8,000	0	26,800

- 2.4 The selection of sites in the draft Local Plan (Regulation 18) does not provide enough office development to meet the quantitative need but could meet the quantitative need for new warehousing space.
- 2.5 The issues raised in the representations to Policy EMP1 and responses to them are summarised in Appendix A. Recommended changes to the policy are set out in Appendices B and C.
- 2.6 The body of this report turns first to the representations and issues associated with allocation land for B class uses at Junction 8 of the M20

Site allocations at Junction 8

- 2.7 Representations from the business and development community question the Local Plan's approach to employment land; it is stated that the Local Plan does not allocate sufficient new employment land and also that the sites included in Policy EMP1 are not of the right type to meet future business needs. These respondents argue that an allocation should be made at Junction 8. In contrast, representations from residents and the local MP support the draft Local Plan for not allocating land at Junction 8.
- 2.8 Since the draft Local Plan (Regulation 18) was prepared and consulted upon, a Qualitative Employment Site Assessment, GVA (2014) ('the Assessment') has been undertaken to complete the employment evidence base for the Local Plan. This Assessment reviewed the borough's existing stock of employment floorspace and assessed the characteristics of current and future demand with the purpose of identifying any gaps in the borough's employment land portfolio to be addressed through the Local Plan.
- 2.9 The findings of the Assessment were reported to meetings of the Planning, Transport & Development Overview & Scrutiny Committee and the Economic and Commercial Development Overview & Scrutiny Committee held on 21st October 2014. The committee report stated:

"Overall, and significantly, there is also an identified lack of employment land supply in the locations most likely to be attractive to the type of occupiers economic growth will attract i.e. along the motorway corridor. Excluding the site at Brooklyn Yard at M20 J6, the existing capacity for industrial and warehousing use is all in the south of the borough where the road links are the weakest. The Assessment states "whilst this does not make these sites redundant, it does potentially limit their future attractiveness to businesses and

¹ Already counted in the GVA study as an existing vacant site so excluded from table to avoid double counting

could restrict the role they play in accommodating employment growth.”²

The Assessment finds that there is both quantitative and qualitative need for additional employment land. New site/s should focus on a 'new', diversified offer in preference to replicating the characteristics of the existing portfolio. This points towards:

- a. Range of flexible, small scale, good quality office space*
- b. Capacity for 'design and build' bespoke industrial space*
- c. Small-medium warehouse/distribution units*
- d. Location/s with good strategic road access to markets*
- e. Location/s with minimal development constraints*
- f. Location/s with ICT connectivity*
- g. Creation of a distinct new employment location*

The Assessment concludes that "there is likely to be demand for a new high quality, well serviced mixed use employment development area that accommodates small business orientated space, standalone industrial and manufacturing provision (albeit likely to be a design and build demand) and smaller scale distribution and ancillary workspace and office space”³.

Additionally the Assessment recommends that plan policies are sufficiently flexible to enable a mix of office, industrial and warehousing uses on sites.”

2.10 The committee report went on to consider the implications of the latest evidence for the selection of sites in the Local Plan;

"Through the latest NPPG-compliant Assessment, the qualitative gaps have now been evidenced more comprehensively and clearly than [through] the information that was available at the time of the February decision⁴. The NPPF requires that Local Plans should "set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period"⁵ (emphasis added).

It is considered that the selection of sites in the Regulation 18 version of the Local Plan would not meet the identified qualitative needs in a location well connected to the strategic road network.

Based on the outcomes of the Strategic Economic Development Land Availability Assessment (SEDLAA)⁶ the only available, additional land at a motorway junction is at J8 of M20. Development in this location would better meet the gap identified through the evidential analysis in the Qualitative Employment Sites Assessment. It could also enable the quantative demand for offices to be met

² Paragraph 6.10 of the Qualitative Employment Site Assessment (2014), GVA

³ Paragraph 8.12 of the Qualitative Employment Site Assessment (2014), GVA

⁴ This refers to the approval of the draft Local Plan for Regulation 18 consultation at Cabinet on 24th February 2014

⁵ NPPF paragraph 21

⁶ Cabinet 24th February 2014

which is not the case for the current selection of Regulation 18 sites."

2.11 Further, the report goes on to state;

"It is considered that the combined findings of the two evidential documents on employment needs⁷ point towards identifying land in the location of J8 in the Local Plan for a mix of offices, industrial and warehousing uses. Balanced against this economic case is the acknowledged sensitivity of the landscape in the J8 location. In the February Cabinet⁸ report it was recognised that development of either of the candidate sites at J8 would cause substantial landscape harm. The limitations of the location in terms of public transport connections and relative separation from the centres of population were also acknowledged.

With the NPPF direction to meet the needs of the economy in full it is officers' view that, with the completion of this qualitative assessment, the balance of planning and economic development considerations now weigh in favour of identifying land in the location of J8 in the emerging Local Plan."

2.12 The Planning, Transport and Development Overview & Scrutiny Committee⁹ resolved that it wished to consider a planning policy for an employment allocation at Junction 8 incorporating appropriate constraints and mitigation. If sufficient safeguards could be incorporated into the policy to the Committee's satisfaction, the Committee would in principle support the development for employment land at Junction 8.¹⁰

2.13 In response, the Cabinet Member for Planning, Transport and Development requested¹¹ outline work to explore options and mitigation strategies for junction 8 including:

- 1) Do nothing
- 2) An area of land north of the A20
- 3) An area of land south of the A20
- 4) An area of land both north and south of the A20
- 5) Further consideration of options eastward of junction 8 (A20 corridor)

2.14 The recent Inspector's decision dismissing the appeals at Waterside Park (south of the A20), which is discussed later in this report, affects the delivery of options 2 to 4. All the requested options have been explored below for completeness.

⁷ Economic Sensitivity Testing and Employment Land Forecast, 2014 (GVA) and Qualitative Employment Sites Assessment, 2014 (GVA)

⁸ Cabinet 24th February 2014

⁹ 21st October 2014

¹⁰ [http://services.maidstone.gov.uk/meetings/documents/g2187/Printed%20minutes%2021st-Oct-2014%2018.30%20Planning%20Transport%20and%20Development%20Overview%20Scrutiny%20Committee.pdf?T=1](http://services.maidstone.gov.uk/meetings/documents/g2187/Printed%20minutes%2021st-Oct-2014%2018.30%20Planning%20Transport%20and%20Development%20Overview%20Scrutiny%20Committee%2018.30%20Planning%20Transport%20and%20Development%20Overview%20Scrutiny%20Committee.pdf?T=1)

¹¹ 16th December 2014 Planning Transport & Development Overview & Scrutiny Committee
<http://services.maidstone.gov.uk/meetings/documents/s39663/141216%20-%20SCRAIP%20report.pdf>

3. AVAILABLE OPTIONS

3.1

1. Do nothing (at Junction 8)

There would be no specific land allocation at J8 in the Local Plan.

The Local Plan approach to B class employment land would be:

- Allocation of land at J7 for a medical hub (primarily medical uses with some associated B class office space)
- Allocate land for the expansion of established rural industrial estates plus Syngenta
- Mote Road for new town centre offices
- Implementation of extant consents (such as Eclipse Park, Brooklyn Yard, Travis Perkins on Forstal Road)

Implications of this approach:

- Portfolio of sites does not meet the qualitative need for new industrial/ warehousing floorspace
- Portfolio of sites does not meet the quantitative need for additional office floorspace. Occupier choice will be lessened as an opportunity to broaden the range and type of Grade A office stock available will be lost. Office-based employment is forecast to generate more than 3,000 jobs over the timescale of the Plan¹². Without sufficient, suitable sites, this jobs growth will be compromised.
- In both cases this is contrary to the NPPF (paragraph 21) which states that anticipated needs should be met.
- The growth potential of the local economy for the period to 2031 is unlikely to be met.
- There would be a mismatch with the Council's approved EDS which has the aim of facilitating 14,400 new jobs by 2031.
- In the absence of the Council being able to demonstrate alternative means to address the identified economic needs, risk of a site at J8 being imposed by the Local Plan Inspector without the mitigation measures the Council would otherwise seek through an allocation policy. The Council would lose the opportunity to fully direct and control the development.

¹² Table 24 Economic Sensitivity Testing & Employment Land Forecast, GVA (2014)

Mitigation:

- Duty to co-operate discussions

3.2

2. Allocate land north of A20 (Land at Woodcut Farm)

Land at Woodcut Farm (25.8ha) would be allocated in the Local Plan. The site is available; it was submitted in the 2013 Call for Sites and is also the subject of a current outline planning application (15/503288OUT).

The Local Plan approach to B class employment land would be:

- Allocation of land at J7 for a medical hub(primarily medical uses with some associated B class office space)
- Allocation of Woodcut Farm at J8 for a mixed use business park (offices, warehousing, industrial)
- Planned expansion of established rural industrial estates plus Syngenta
- Mote Road for new town centre offices
- Implementation of extant consents (such as Eclipse Park/ Travis Perkins on Forstal Rd/ Brooklyn Yard)

Implications of this approach:

- Quantitative and qualitative employment land needs are addressed
- Flexibility and choice provided by other allocated sites and extant consents
- Development will have significant landscape impacts, in particular on the setting of the AONB
- Development will impact on the setting of the listed Woodcut Farmhouse
- Site is somewhat removed from the built up area of Maidstone and not well served by public transport currently. Prospect of employees relying on cars to get to work.

Mitigation:

- Allocation policy to specify mitigation measures namely extent and location of structural landscaping, extent of developable area, mitigation of heritage impacts and maximum heights and sqm of buildings. Also an undeveloped 7ha area of land to the north/northwest to be secured via s106 agreement to prevent further encroachment west. Include the requirement for a Travel Plan to include improved public transport measures to be prepared in connection with a planning application.

3.3

3. Allocate land south of A20 (Waterside Park)

Land at Waterside Park (17ha) would be allocated in the Local Plan. The site is available; it was submitted in the 2013 Call for Sites and has been the subject of two recent planning applications (14/501895 and 13/1549), both refused. The subsequent appeals were dismissed in July.

The Local Plan approach to B class employment land would be:

- Allocation of land at J7 for a medical hub (primarily medical uses with some associated B class office space)
- Allocation of Waterside Park at J8 for a mixed use business park (offices, warehousing, industrial)
- Planned expansion of established rural industrial estates plus Syngenta
- Mote Road for new town centre offices
- Implementation of extant consents (such as Eclipse Park/ Travis Perkins on Forstal Rd/ Brooklyn Yard)

Implications of this approach:

- Quantitative and qualitative employment land needs are addressed
- Flexibility and choice provided by other allocated sites and extant consents
- The very recent appeal Inspector's analysis of the environmental sensitivities of this site weigh very strongly against allocating this site for B class uses in the draft Local Plan.

Mitigation:

- Allocation policy to specify mitigation measures namely the extent and location of structural landscaping, use of terracing, ecological mitigation and sustainable drainage requirements. Requirement for a Travel Plan to include improved public transport measures to be prepared in connection with a planning application.

3.4

4. Allocate land north and south of A20 (Land at Woodcut Farm & Waterside Park)

Allocate Waterside Park and Woodcut Farm in the Local Plan.

The Local Plan approach to B class employment land would be:

- Allocation of land at J7 for a medical hub(primarily medical uses with some associated B class office space)
- Allocation of Waterside Park at J8 for a mixed use business park (offices, warehousing , industrial)
- Allocation of Woodcut Farm at J8 for a mixed use business park (offices, warehousing , industrial)
- Planned expansion of established rural industrial estates plus Syngenta

- Mote Road for new town centre offices
- Implementation of extant consents (such as Eclipse Park/Travis Perkins on Forstal Rd/ Brooklyn Yard)

Implications of this approach:

- Quantitative and qualitative employment land needs are addressed
- Maximise the opportunities for growing the borough's economy through attracting businesses requiring good strategic road access
- Significant landscape impacts, in particular on the setting of the AONB, arising from the development of both sites in a sensitive landscape location
- The very recent appeal Inspector's analysis of the environmental sensitivities of this site weigh very strongly against allocating land south of A20 for B class uses in the draft Local Plan.

Mitigation:

- Site specific allocation policies as above

3.5

5. Options east of J8

Existing developed sites along M20 corridor are:

- Great Danes hotel: site is approximately 8ha and less than 900m from Junction8. Site quite well screened from A20 but land falls away to the south and existing hotel can be seen in views from the footpaths to the south which run to the west of Leeds village and from the public rights of way along the North Downs. Site is in current use and has an existing use value as a consequence which will impact on the viability of a comprehensive redevelopment for employment use. Existing development is a mix of 2/3/4 storeys
- Marley Works: site is approximately 25ha in area and is immediately adjacent to the AONB. It is an existing developed business site in active use with no apparent vacancy. Expansion to the west would result in the loss of significant belts of woodland and would encroach towards the scattered residential properties fronting Dickley Lane and Marley Road. Expansion to the east would be immediately adjacent to the AONB boundary. Approx. 4.5 miles to J8 along A20.
- Lenham Storage: site is approximately 9.5ha in area and is owned and operated by Lenham Storage. Lenham Storage are understood to be content to operate from the site for the short-medium term (5+ years) and have no current plans to relocate. Approx 4.8 miles to J8 along A20.
- Major new employment site in association with the Lenham broad location: Any such proposal would need to be planned as part of the comprehensive planning of the Lenham broad location (eg siting of development, location of access onto A20, highway impact assessment, landscape mitigation) and thereby would not be delivered until the latter end of the plan period (2026+). Depending on the

exact location of the site, the distance to J8 would be in the order of 5 miles.
<p>Implications of this approach:</p> <ul style="list-style-type: none"> • The 2013 Call for Sites exercise identified which sites were available as potential new employment sites. None of these site options were put forward in this exercise for employment re/development and are not therefore demonstrably available for the nature of development for which land is needed. • Locations in and around Lenham do not have immediate access onto the motorway network. The lack of available land with such strategic road access has been identified as a shortcoming in the borough's existing commercial property portfolio. • Delay to the Local Plan process (and associated expense) while site availability and assessment work, including viability testing, is undertaken. Resulting additional uncertainty for developers, landowners, businesses and local residents. • Potentially abortive and unnecessary work in the face of there being identified available land which is more immediately adjacent to J8.
<p>Mitigation:</p> <ul style="list-style-type: none"> • Would be dependent on site selection

4. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS

- 4.1 If the borough's employment land needs are to be addressed in a timely manner, and properly planned for through the Local Plan, it is considered that the findings of the outline options assessment above do not alter the conclusion of the 21st October Overview & Scrutiny report which favours the allocation of land in the immediate vicinity of Junction 8. The potential sites further to the east are not demonstrably available for employment use and do not have the benefit of immediate access to the M20.

Waterside Park Appeals Decision

- 4.2 The Waterside Park appeals decision letter received on 23rd July provides relevant and up to date analysis of key issues pertaining to this Committee's decision about allocating land at Junction 8. The appeal Inspector weighed the economic benefits of the specific proposals for Waterside Park against the adverse environmental impacts and concluded that the adverse impacts would significantly and demonstrably outweigh the benefits. The appeals were dismissed.
- 4.3 Whilst the Inspector's decision is specific to the Waterside Park site and the proposals put forward for it, her analysis is a relevant factor in the Committee's decision to include, or otherwise, an allocation at Junction 8 in the Local Plan and, subject to that, the selection of the site.

- 4.4 The Inspector raises specific concerns about the proposals for the Waterside Park site, principal amongst them being visual and landscape impact, including on the setting of the AONB, and impact on heritage assets. The Inspector was not persuaded that adverse impacts of the development proposed could be sufficiently mitigated
- 4.5 As part of her consideration of the stage that the emerging Local Plan has reached, the Inspector notes that the Waterside Park site may eventually be included as an allocation through the Local Plan process. Indeed Waterside Park's planning agent has chosen to confirm that the site is still available for employment development, potentially of a reduced scale and on a smaller site footprint. Development of any significant scale on the site would, however, still require significant alteration to the landform through excavation and bunding to create a development platform. The Inspector regarded these as alien, engineered features which would permanently alter the natural landform. Further, in a previous comparative assessment of the Waterside Park and Woodcut Farm sites undertaken by officers and presented to Cabinet in July 2012 it was identified that the scope for mitigation on the Waterside Park site was limited. The analysis concluded that the Woodcut Farm site was the more suitable of the two sites to allocate.
- 4.6 The Woodcut Farm site also falls within the setting of the Kent Downs AONB. This is a nationally important landscape. Councils have a duty, when exercising any functions in relation to, or affecting land in, an AONB to have regard to the purpose of conserving or enhancing the natural beauty of the AONB.
- 4.7 Also relevant to the Woodcut Farm site is that the Inspector highlighted the high sensitivity of walkers using the public rights of way in the AONB. From these routes there are largely uninterrupted views south towards the J8 and its surrounds. The Inspector was concerned about the impact of development reducing gaps between the existing scattered developments to give the appearance of a mass of development which would be detrimental to the wider landscape and rural character. She notes that from this direction, the M20/HS1/A20 infrastructure is much less discernable than from views looking towards the AONB.
- 4.8 The Council's own Landscape Character Assessment (2013) includes the Woodcut Farm site as within the White Heath Farmlands detailed character area within the Leeds Castle Parklands borough-wide landscape character area. The detailed area is assessed as having moderate sensitivity to change and poor condition with its key characteristics identified as major infrastructure, vegetation belts along the head of the Len Valley, urban influences including car dealership and modern development.
- 4.9 The Maidstone Landscape Capacity Study Site Assessments (January 2015) includes a specific assessment of the capacity of the Woodcut Farm site to accommodate economic-related development. It identifies that the site is a very large scale landscape with extensive arable fields and the nearby detracting features of the M20/HS1/A20. The site's location at the foot of the Downs, its landform which is a continuation of the downland topography and the large

scale field pattern is distinctive and characteristic of the area. It identifies that the site has a low capacity to accommodate economic development.

- 4.10 The analysis goes on to identify mitigation points which development proposals on this site should take into account namely to retain and reinforce streamside vegetation, other tree belts and significant vegetation; to retain the rural landscape character and the distinctive landform which forms an integral part of a wider pattern of undulations along the scarp foot of the Kent Downs; to respect the setting of surrounding heritage assets; and to respect views from, and the setting of, Kent Downs AONB.
- 4.11 The Inspector also finds that the Waterside Park proposal would harm the setting of heritage assets, in particular Leeds Castle (Grade I) and its parkland (Grade II*). In the case of the Woodcut Farm site, Woodcut Farmhouse (Grade II) lies immediately to the west of the site and, without mitigation, development could have an adverse impact on the setting of this heritage asset.
- 4.12 Turning to economic matters, the Inspector accepted that there is need for additional B class floorspace and considered (but did not conclude) that the quantum of floorspace required could be greater than the Council's Local Plan evidence indicates. She stated that there does appear to be a need for more employment allocations. She also did not dissent from the evidence that there is a qualitative need for a site well located to the strategic road network.
- 4.13 The Inspector considered that it had not yet been demonstrated, however, that the need would have to be met through a greenfield countryside site allocation. She specifically mentions the Detling Aerodrome as a site put forward by 3rd parties at the Inquiry as a competing site.
- 4.14 In response, the requirement for B class employment land set out in the table at paragraph 2.3 above is in addition to the supply which will come forward on brownfield sites through re-occupation of vacant sites and premises, and redevelopment within existing industrial estates as well as the implementation of extant planning permissions. The evidence identifies that there is a demonstrable need to make additional greenfield site allocations, above that which can be delivered on existing sites, if the borough's employment needs are to be met. There has been specific testing of the suitability of the alternative available sites submitted through the Call for Sites in the Strategic Economic Development Land Availability Assessment (2013).
- 4.15 The Detling Aerodrome is an existing employment site (13.4 ha) which is actually within the AONB unlike both the Woodcut Farm and Waterside Park sites. Substantial redevelopment of the existing site and expansion onto the greenfield land to the north and south as has been proposed by Kent County Council, in combination with the associated highway improvements to the A249 would result in direct and serious visual and landscape harm to the AONB itself. It is not therefore a realistic alternative to making an allocation at Junction 8.
- 4.16 The Inspector highlights the potential to use vacant industrial floorspace in adjoining boroughs under 'duty to co-operate' arrangements. In response, it is important to recognise that the first option should be for the Council to meet its

own needs within its own boundaries. Only if there is clear, defensible reasons why this cannot be achieved should provision be sought in adjoining boroughs through duty to co-operate discussions. Importantly, nearby authorities are under no obligation to accommodate Maidstone's needs. Employment land within their boundaries may already be accounted for as part of their own functional supply, contributing to the growth needs of their own population and economy. Further, these councils may also elect to use vacant or underused employment land for alternative uses, including for housing as a way of contributing to their own 'objectively assessed need'.

- 4.17 The Inspector also raised concerns that workers would predominantly access Waterside Park site by private car/motorcycle. She draws this conclusion in part based on the number of car parking spaces proposed in the specific schemes but the overall accessibility to the Woodcut Farm site by existing public transport would be, in broad terms, similar and would raise a similar concern.
- 4.18 On a final point, the Inspector finds it unsatisfactory that there is a vacuum of allocated land for employment uses when there is evidence of local firms wishing to expand. Whilst the saved policies of the adopted Local Plan are clearly in place, and indeed the Inspector gives significant weight to Policy ENV28, there is now the opportunity for this Committee to come to a confirmed decision on the Council's future approach to land at Junction 8 through the Local Plan.

Economic Development Strategy

- 4.19 The Council's Economic Development Strategy (EDS) was recently adopted by Full Council¹³. The EDS sets out the Council's ambitions to achieve economic growth up to 2031.
- 4.20 There is an inter-relationship between the Local Plan's approach to employment land and the Council's EDS. The Local Plan can take the role of delivering the spatial aspects of that strategy. Importantly the EDS draws on the same employment land evidence as that which supports the Local Plan.
- 4.21 The EDS states that, by 2031, we aim to:
- enable the creation of 14,400 jobs in a range of sectors and occupations
 - raise economic output (GVA) per head to the level of the South East
 - raise the skills profile of Maidstone to the South East average¹⁴
- 4.22 The EDS goes onto identify 5 priority actions. In addition to stimulating entrepreneurship, enhancing the town centre, and improving skills and infrastructure, the EDS prioritises retaining and attracting inward investment. To do this;

“we will support existing businesses to grow and also work to attract new employers to the borough, creating job opportunities for all residents across a range of sectors.”¹⁵

¹³ 15th July 2015

¹⁴ Para 1.1.2 EDS

- 4.23 To achieve the stated ambition of enabling 14,400 new jobs, depends on four named factors, one of which is ‘filling the gap in our portfolio of employment sites to meet modern business needs.’ The EDs explicitly links its ambitions for job creation with developing a site at Junction 8 as follows;

“The strategic case for a new employment site at Junction 8 has been established and its development is critical to ensuring that the principal aim of the Strategy is achieved i.e. the creation of 14,400 jobs by 2031 in a range of sectors and occupations” ¹⁶ (emphasis added)

Sustainability Appraisal

- 4.24 A Sustainability Appraisal (SA) of the 2 site options (Woodcut Farm and Waterside Park) has been undertaken by expert consultants URS and is appended in Appendix E. The SA reveals that both sites generally score poorly for their accessibility to existing centres and community facilities and that their overall accessibility by sustainable transport modes is constrained, although the Woodcut Farm site is closer to a bus stop. The SA identifies that both sites have a low landscape capacity for change.
- 4.25 Additionally, the SA prepared in association of the Regulation 18 Local Plan examined two employment distribution options: one of concentration whereby employment development would be focused in the town centre, at Junction 7 and at junction 8 (option A) and one of dispersal which would see development at the town centre, Junction 7 and dispersed at existing employment locations in the rural area (option B).
- 4.26 This previous SA found both alternatives to have a significant positive impact by increasing the quantity and quality of employment opportunities. There would also be benefits in terms of increased opportunities to develop skills in the health sector in particular. Both options would help to tackle deprivation by providing jobs in close proximity to areas of need. This is particularly the case for alternative A. However, there is a danger that increased movements into the Maidstone urban area could exacerbate existing congestion and air quality issues, having an effect on the wider local economy and health. These effects would be less pronounced for alternative B, which would disperse an element of employment to a number of settlements to the south of the urban area. This dispersal strategy would also support the local economies in a number of service centres, but might not attract high-profile development. Alternative A could have a significant negative impact on landscape character due to the location of the Junction 8 site in relation to the Kent Downs AONB. Although alternative B could still lead to localised impacts on character around a number of settlements, the impacts are considered less significant.
- 4.27 Both alternatives make little use of previously developed land and would lead to the loss of grade 2 and 3 agricultural land. The SA concluded that, on balance, alternative B has fewer impacts on congestion, countryside and heritage.

¹⁵ Para 5.9 EDS

¹⁶ Para 6.22 EDS

Landscapes of Local Value

- 4.28 Elsewhere on this agenda, it is proposed that the Local Plan designates Landscapes of Local Value (LLVs). The designation of the LLVs draws on the evidence provided by the Council's own landscape character and sensitivity assessments to protect valued landscapes which are sensitive to significant change. One of the proposed LLVs would cover the setting of the AONB and would include Woodcut Farm, and a second LLV would cover the Len Valley incorporating Waterside Park.
- 4.29 The proposed LLV designation does not preclude development. Proposed changes to draft Local Plan Policy SP5 - Countryside would clarify that "Development proposals within landscapes of local value should, through their siting, scale, mass, materials and design, seek to contribute positively to the conservation and enhancement of the protected landscape."

Conclusion on the allocation of land at Junction 8

- 4.30 Junction 8 is a highly sensitive location. It is an area of countryside removed from the built up area which forms part of the setting of the AONB. Development of the scale being proposed would have significant adverse landscape impacts and cause harm to the wider rural character of the area. The limitations of the location in terms of public transport connections and relative separation from the centres of population are also important factors, as is the potential for development adversely to impact on heritage assets.
- 4.31
- 4.32 The Council's own landscape analysis of the Woodcut Farm and the Waterside Park sites shows both sites to have low development capacity for economic related development.
- 4.33 Weighing in favour of making a local plan allocation is the identified qualitative gap in the future supply of employment land and quantitative shortfall in office floorspace. The Council's employment land evidence supports the need to make an allocation at Junction 8 to accommodate employment land needs.
- 4.34 Also highly relevant to the consideration is the Council's very recently adopted Economic Development Strategy which is ambitious in its plans for economic growth and explicit that the Council is seeking to maximise jobs growth in the borough. The strategy directly links the achievement of the Council's economic goals with the delivery of a site at Junction 8.
- 4.35 With respect to duty to co-operate, there is no requirement for neighbouring authorities to meet Maidstone's employment land needs. Implicit in the EDS is that the jobs growth should be created in Maidstone borough rather than in adjoining authority areas.

- 4.36 An allocation at Junction 8, for a mixed B class development could also enable the quantitative shortfall in new office floorspace identified over the plan period to be addressed.
- 4.37 Faced with this economic case, including a specific site allocation in the Local Plan enables the Council to set out the requirements for development, including clear and substantive mitigation measures, to help ameliorate the impacts of development in this highly sensitive location.
- 4.38 It is considered that the size and topography of the Woodcut Farm site would enable the provision of extensive structural and internal landscaping which, in conjunction with the site's capability to accommodate development within a parkland setting, would better mitigate the landscape impacts of development.
- 4.39 A proposed site allocation policy for the Woodcut Farm site is set out in Appendix B. This policy is recommended for inclusion in the forthcoming Local Plan Regulation 18 consultation. The policy has been reviewed and refined in the light of the Waterside Park decision.
- 4.40 Key mitigation measures in the policy are
- Limit on the developed area of the site
 - Provision of substantial internal and structural landscaping to help diffuse the visual impact of development
 - Control over building heights, size and siting to help mitigate the visual impact of development and to control the extent of alterations to the site's topography to create level development platforms
 - Retain through a legal agreement the highest part of the site as an undeveloped landscape area to secure against further encroachment of development westwards.
 - Requirement to have regard to the setting of the listed Woodcut Farmhouse
- 4.41 The officer assessment of the representations made to the draft Local Plan in connection with Junction 8 are set out in Appendix A. This consideration of the content of the representations has not resulted in an alteration to the recommendation that an allocation at Woodcut Farm is merited.

Other Policy EMP1 matters

- 4.42 The proposed employment sites have been assessed in the emerging Landscape Capacity Study (2015). The site at Barradale Farm Headcorn, proposed for employment development in Policy EMP1(4) in the draft Local Plan, has been identified as having a low landscape capacity for development. The concerns centre on the importance of the field boundary trees and vegetation for ecology and for filtering views of the existing development, the contribution of the prevailing pattern of small enclosed field pattern to the local landscape character, the relative remoteness of the site and local prevailing character of scattered farmsteads.
- 4.43 Reviewing the draft allocation policy, and the mitigation measures within it, the policy specifically requires the substantial enhanced landscape buffers along

the site boundaries to strengthen the existing boundaries. These landscape belts are required to link to one another and to water bodies to provide habitat connectivity. In terms of field pattern, the allocation extends to one field (1.9ha) so development can be achieved within the existing field pattern without significantly re-aligning or extinguishing the existing field boundaries.

- 4.44 Development would enable the planned expansion of an existing well used industrial estate. The existing site has very good quality industrial units with good access which, according to the analysis in the Qualitative Employment Sites Assessment (2014), should be retained and potentially expanded. Allocation of this site would help ensure range of new sites to cater for a diversity of business needs including in the more rural parts of the borough. With the mitigation measures set out in the policy, it is considered that the site continues to be appropriate for allocation in the Local Plan.

5. CONSULTATION RESULTS AND PREVIOUS COMMITTEE FEEDBACK

- 5.1 The draft Local Plan (Regulation 18) was subject to public consultation and the issues raised in the representations which were received are discussed in this report and its appendices..

6. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION

- 6.1 As part of the Local Plan process further iterations of Policy EMP1 will be subject to public consultation.

7. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
Impact on Corporate Priorities	Having an adopted Local Plan in place will assist in the delivery of the Council's priorities.	Rob Jarman, Head of Planning & Development
Risk Management	A sound evidence base and further public consultation on policy amendments reduces the risk of Policy EMP1 being found unsound at the Local Plan Examination	Rob Jarman, Head of Planning & Development
Financial	There are no direct financial implications arising from this report. Failure to produce a robust Local Plan would have significant financial implications for the Council.	Head of Finance & Resources
Staffing	The proposed Regulation 18 consultation can be managed within the existing staff	Rob Jarman, Head of

	establishment.	Planning & Development
Legal	The report has been reviewed in the light of the appeal decision at Waterside Park. Mid Kent Legal Services continue to provide advice on local plan matters and to review any legal implications of reports.	[Legal Team]
Equality Impact Needs Assessment	n/a	[Policy & Information Manager]
Environmental/Sustainable Development	The Local Plan is fundamentally concerned with achieving sustainable development. The Waterside Park Inspector specifically considered that proposal did not constitute sustainable development.	Rob Jarman, Head of Planning & Development
Community Safety	n/a	[Head of Service or Manager]
Human Rights Act	n/a	[Head of Service or Manager]
Procurement	n/a	[Head of Service & Section 151 Officer]
Asset Management	n/a	[Head of Service & Manager]

8. REPORT APPENDICES

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

- Appendix A: schedule of issues and responses for Policy EMP1
- Appendix B: proposed site allocation policy for Land at Woodcut Farm
- Appendix C: site plan for Land at Woodcut Farm
- Appendix D: schedule of detailed changes to Policies EMP1 (in addition to the proposed allocation of Land at Woodcut Farm)
- Appendix E: outline Sustainability Appraisal of site options at Junction 8

9. BACKGROUND PAPERS

nil

APPENDIX A: schedule of issues and responses for Policy EMP1

Policy Number EMP1	General comments/objections to Policy EMP1	
Number of Support / Object / General Observations		
Summary of issues	Officer Response	Proposed change
Support the policy (resident; parish councils)	Support welcomed	No change.
Additional criterion to guide planning decisions and ensure that existing underground sewers are not built over, and they can continue to fulfil their function (Southern Water)	Whilst supported, this is a detailed development design matter which would be dealt with at planning application stage. It is unnecessary to include it as a specific reference in the site allocation policies.	No change.
Plan does not provide sufficient employment land. The allocations in Policy EMP1 combined with those in Policy RMX1 provide for 51,100sqm of B1/B2/B8 provision, compared with a requirement in Policy SS1 of 70,201sqm for industrial and office uses, a shortfall of 19,101sqm. (developer)	Following the completion of the Qualitative Employment Sites assessment (2014), GVA, the updated employment land position was set out in a report to Planning, Transport and Development Overview and Scrutiny Committee on 21 st October 2014. The sites identified in Policies EMP1 and RMX1 serve to meet the quantative need for additional industrial/warehousing floorspace but do not provide sufficient new office floorspace. Further land allocations should be identified to satisfy future	Include a site allocation policy for Land at Woodcut Farm in Policy EMP1

	office needs ¹ . The allocation of land at M20 J8 for a mixed B class employment uses would serve to address this shortfall in the amount of office space planned.	
<p>The locations identified are unsuitable to meet the significant employment land requirements of the Borough, in terms of</p> <ul style="list-style-type: none"> • connections to the strategic road network • site capacity; sites unable to accommodate larger B1, B2 and B8 businesses • market interest • Sites will add to vehicular traffic including HGVs on the rural road network • Unsuitability of such sites has already been demonstrated, by the publicly confirmed plans of both ADL and SCARAB, to leave existing premises at Marden <p>Whilst locations such as Marden are suitable to accommodate further employment development, they will always be limited in function. It is necessary in qualitative terms to allocate additional sites capable of meeting the evidenced need. Land at M20 J8 should be allocated for employment development (businesses; business representative groups; developers)</p>	<p>The findings of the Qualitative Employment Sites Assessment, GVA (2014), and the implications for the Local Plan's approach to employment land, are set out in the report to Planning, Transport & Development Overview and Scrutiny Committee on 21st October 2014. This concludes that the balance of considerations weigh in favour of making at allocation at M20 J8 for mixed use B class business park form of development. This work has been further supplemented by the options assessment set out in the covering report.</p> <p>In addition, the sites currently allocated in Policy EMP1 are considered to be inherently suitable sites for B class employment. Retention of these sites in the policy is recommended to allow for some flexibility and choice of locations</p>	<p>Include a site allocation policy for Land at Woodcut Farm in Policy EMP1</p>

¹ NPPF paragraph 21

		for new/expanding businesses.	
Policy Number EMP1(1)	Site Name: Mote Road		
Number of Support / Object / General Observations			
Summary of issues		Officer Response	Proposed change
Site should be retained for car parking (CPRE)		This site is currently used as informal car parking for the adjacent office accommodation. Better use could be made of this town centre site through redevelopment and the site has the potential to contribute to the identified need for additional office floorspace over the timeframe of the Local Plan. An expired consent for the site would have delivered 8,000sqm of new office floorspace in a multi-storey building. This is the capacity proposed in the policy. The Qualitative Employment Sites Assessment (2014) identifies that market demand is now for more flexible, smaller scale units. Recognising that the market may favour a mix of smaller units on this site, it is proposed that the capacity be amended to state up to 8,000sqm.	Revise site capacity to <u>up to</u> 8,000sqm.

Policy Number EMP1(2)	Site Name: Land south of Claygate, Pattenden Lane	
Number of Support / Object / General Observations		
Summary of issues	Officer Response	Proposed change
Support (CPRE)	Support welcomed	No change
Concern about the unsuitability of the site to meet the significant employment land requirements of the Borough	The allocation of this site allows for the planned expansion of this established business area. Consent has been granted for a number of expansions to the Claygate site since the adoption of the 2000 Local Plan. The allocation of this and other sites in Policy EMP1 provides a number of different sites in varying locations to meet a range of B class needs over the timeframe of the Local Plan.	No change
Policy Number EMP1(3)	Site Name: West of Wheelbarrow Industrial estate, Pattenden Lane, Marden	
Number of Support / Object / General Observations		
Summary of issues	Officer Response	Proposed change
Concern about the unsuitability of the site to meet the significant employment land requirements of the Borough	The allocation of this site allows for the planned expansion of this established business area. Consent has been granted to extend the Wheelbarrow estate to the	No change

		north since the adoption of the 2000 Local Plan. The allocation of this and other sites in Policy EMP1 provides a number of different sites in varying locations to meet a range of B class needs over the timeframe of the Local Plan.	
Object as site extends into the countryside (CPRE)		The proposed allocation ‘squares off’ this site. The western boundary aligns with the existing commercial development to the south. The site includes an existing reservoir. In the face of a need for additional employment land it is considered that this is an eminently suitable site which forms a logical extension to the existing business park.	No change.
Policy Number EMP1(4)	Site Name: West of Barradale Farm		
Number of Support / Object / General Observations			
Summary of issues		Officer Response	Proposed change
Support (residents; parish council)		Support welcomed	No change
Concern about highway impacts (residents); <ul style="list-style-type: none">• traffic on A274 and rat running on rural lanes; (JPG)• Access to the motorway is via Maidstone.• relocate the existing access to the neighbouring		The Highways Authority has not raised any objections to the proposed allocation of this site. The site benefits from direct access onto A274, a main north/south route, thereby reducing the prospects of	No change.

<p>Stonestile Business Park in Stonestile Lane through the Barradale Farm site via an improved access point on the A274. This will then enable the existing Stonestile Business Park access to be permanently sealed up, thereby alleviating the significant traffic hazard created by commercial vehicles entering and leaving via the inadequate Stonestile Cross Roads and Stonestile Lane (residents; parish council)</p> <ul style="list-style-type: none"> • Also provision of a footway connection to the existing footway into Headcorn • Also a possible cycle route to the village via Tattlebury Lane and Ulcombe Road should be considered. (resident) 	<p>HGV movements on less suitable rural roads. Notwithstanding the nature of the site's connections to the motorway, this is a well-used site of modern premises . The link to the Stonestile Business Park proposed in a number of representations would have to be routed across the open field which currently separates Barradale Farm site and the Stonestile Business Park. This would create an additional visual intrusion into the landscape. KCC Highways has confirmed that crash data does not support the need for the additional link. It could also serve to increase the development pressure on the land that would become contained by the new access road. The draft policy provides for a new pedestrian link to the Stonestile Lane junction where there is an existing pavement along the eastern side of A274 towards Headcorn. There are no current proposals to create a cycle route along Tattlebury Lane. Whilst the narrow and rural nature of the lane does not suggest that a formally designated cycle route would be appropriate, the route is clearly open to cyclists to use in its current form.</p>	
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<p>Concern that the site and Stonestile Lane floods and further development will displace floodwater to residential properties; (residents, parish council)</p>	<p>The Environment Agency has not objected to the inclusion of this site in the draft Local Plan. The north western extremity of the allocated site falls within flood zone 3 where the policy specifies that structural landscaping, rather than development, will be located. In terms of surface water run off, the Environment Agency requires that 'green field' run off rates are maintained after the development is completed. The policy specifies that surface water run off is to be managed using sustainable techniques.</p>	<p>No change</p>
<p>Concern about impact on power supply and sewerage system;</p>	<p>South Water, which is responsible for waste water management, has not objected to this allocation. Similarly no objection has been received from UK Power Networks.</p>	<p>No change.</p>
<p>Concern about the visual impact of existing buildings and the proposed expansion. Site would be inappropriate development in the countryside (CPRE)</p>	<p>In terms of visual impact, the policy provides for specific mitigation measures namely the incorporation of structural landscaping features along the boundaries of the site. Criterion 1 requires additional landscaping to screen both the existing and proposed new buildings. In the face of a need for</p>	<p>No change.</p>

	additional employment land and the need for some flexibility and choice, and with the mitigation measures proposed, it is considered that this is a suitable site.	
Number of jobs created from industrial/warehousing uses will not be sufficient to match the housing growth planned for Headcorn (resident)	Based on an assessment of services and facilities, Headcorn is an identified Rural Service Centre which can accommodate an element of housing growth. The relationship between where people chose to live and where they work is a complex one, and for any individual will be influenced by a range of factors. Not all Headcorn residents will want, or be able, to work locally. The village's rail connection in particular will inevitably mean a proportion of people will commute out of the village for work. The Local Plan has a role in facilitating local job opportunities, including by protecting existing business sites (Policy DM18) and by allocating new land such as the site at Barradale Farm.	No change.
Unit size should be limited to 500sqm. (residents; parish council)	Existing buildings on the Barradale Farm site are 1,000+ sqm in size. In the context of these larger buildings, a restriction as proposed would be unduly prescriptive.	No change.
Concern about the unsuitability of the site to meet the significant	The allocation of this site allows for the	No change.

employment land requirements of the Borough		planned expansion of this established business area. The allocation of this and other sites in Policy EMP1 provides a number of different sites in varying locations to meet a range of B class needs over the timeframe of the Local Plan.	
Policy Number EMP1	Omissions from Policy EMP1		
Number of Support / Object / General Observations			
Summary of issues		Officer Response	Proposed change
<p>Waterside Park at M20 J8 should be allocated in the Local Plan for a range of employment uses including B1, B2 and B8 uses.</p> <ul style="list-style-type: none">It is the most appropriate site at M20 J8Waterside Park is able to accommodate the scale and type of building able to meet evidenced quantitative and qualitative need, <p>Woodcut Farm at M20 J8 should be allocated in the Local Plan:</p> <ul style="list-style-type: none">The significant economic advantages of the site outweigh the impact of development. The visual impact of development is capable of effective mitigation.Site offers opportunity for enhanced public access, including through the implementation of a travel plan.		<p>The findings of the Qualitative Employment Sites assessment (2014), GVA, and the implications for the Local Plan’s approach to employment land, are set out in the report to Overview and Scrutiny Committee of 21st October 2014. The conclusion of the analysis is recommended that the balance of considerations weigh in favour of making at allocation at M20 J8 for mixed use B class business park form of development.</p> <p>Both the Woodcut Farm and Waterside Park sites have been assessed in detail in the Strategic Housing and Economic Development Land Availability</p>	<p>Include a site allocation policy for Land at Woodcut Farm in Policy EMP1</p>

	<p>Assessment (2014). A comparison of the two sites was set out in the report to Cabinet of 25th July 2012 (paragraphs 1.3.33 to 1.3.41). This comparative assessment concluded “Given the size of the Woodcut Farm site and its capacity to provide for extensive structural and internal landscaping, as well as its capability to accommodate development within a parkland setting, it is recommended that this site be allocated for employment development”.</p> <p>Proposals for B class development at the Waterside Park site have recently been dismissed at appeal.</p>	
Support the omission of an allocation at M20 J8 in Policy EMP1 (residents; MP)	Support noted however it is now proposed that land at Woodcut Farm be allocated in Policy EMP1.	Include a site allocation policy for Land at Woodcut Farm in Policy EMP1
Ringles Business Park Headcorn, has been rejected by MBC. This is a brown field site and inclusion in the LP would have ensured more control as to the quality of the development, particularly when the existing glasshouses become redundant (resident) .	This site was assessed and rejected for development for the reasons set out in the Strategic Housing and Economic Development Land Availability Assessment (2014).	No change.
Include the land already allocated for employment at the west end of Lodge Road, Staplehurst. (resident)	This land referred to has extant consent for more than 10,000sqm of B class floorspace and this has been taken into	No change.

	account when calculating how much additional employment land needs to be allocated in the Local Plan. As the site has consent, there is no additional necessity to specifically allocate it in the Local Plan. This land has been put forward as a potential new housing site by developers. SPS&T Committee decided to retain this site for employment at its meeting on 23 rd July 2015	
Include Maidstone Livestock Market at Detling Airfield as site suitable for B1/B2 and B8 uses (landowner) .	Cabinet (14 th January 2015) agreed that the Livestock Market be included within the defined boundary of the Detling Airfield Economic Development Area as suitable for B class uses (Policy DM18). There is no additional need to allocate the site in Policy EMP1.	No change.
Include Detling Aerodrome site (parish council; landowner). Existing site makes a significant contribution to employment. Site has scope to be redeveloped in a more efficient layout and expanded. This development would enable a new roundabout access off A249 to serve the showground and the employment area which would alleviate congestion at M20 J7 and A249/M2 junctions and alleviate dual movements when exiting the showground sites and reduce the accident rate on this stretch of road. Site would be attractive to businesses requiring ready access to the strategic road	<p>The existing site has been identified as an Economic Development Area through Policy DM18. This policy would support redevelopment proposals to upgrade the commercial premises on the site within its existing confines.</p> <p>The site is located in the Kent Downs AONB. Significant expansion of the site for employment and/or housing would</p>	No change.

network(developer)	adversely impact on this nationally important landscape. This impact would be furthered by the proposed access arrangements onto A249.	
Allocate Brooklyn Park for B class uses (developer)	Cabinet agreed that Brooklyn Yard be included in Policy DM18 as an existing Economic Development Area at its meeting on 14 th January 2015 . The site has an extant consent for warehouse/distribution uses and a current application for B2 (industrial) use. In these circumstances it is not necessary to allocate this site in Policy EMP1.	No change.

APPENDIX B

Policy EMP1(x) Land at Woodcut Farm,

Ward: North Downs

Parish: Hollingbourne

Current use: agriculture

There is a unique opportunity in the borough to provide a prestigious business park at Junction 8 of M20 that is well connected to the motorway network and that can provide for a range of job needs up to 2031. This will help to diversify the range of sites available to new and expanding businesses in the borough to help accommodate future demand.

Land at Woodcut Farm is allocated to provide for a mix of business uses comprising industrial, offices and distribution/logistics. High quality office development is sought, such as that required by company headquarters for example, providing complementary provision to the town centre.

The site, which is some 25.8ha in size in total, is situated to the west of the A20/M20 junction (junction 8). It comprises the wedge of land lying between the M20 to the north east and the A20 to the south west. The site is agricultural land, divided into fields by hedgerows which predominately run in a north-south direction. The site is also bisected north-south by a watercourse which eventually runs into the River Len to the south of the A20. The land is undulating, the ground rising up from either side of the watercourse. To the south the site borders a number of dispersed properties which front onto the A20 (Ashford Rd). To the south east the site is bounded by Musket Lane. To the north west lies Crismill Lane and a substantial tree belt which fronts onto this lane. The site boundary then follows the hedge belt which adjoins Crismill Lane approximately half way down its length and links to the complex of buildings at Woodcut Farm and turns south to the A20, running along the eastern boundary of the fields which front onto the Woodcut Farm access.

The site is located in the countryside and lies within the setting of the nationally designated Kent Downs Area of Outstanding Natural Beauty (AONB). The site falls within the White Heath Farmlands landscape character sub-area Landscape Character Area Assessment 2012 - ref 49-2 where landscape condition is poor overall, partially because of the fragmentation caused by the existing highway infrastructure. Landscape sensitivity for the character sub-area is recorded as moderate, the landscape providing the setting of the Kent Downs (AONB).

The site itself has been specifically assessed in the Maidstone Landscape Capacity Study (2015). This finds that the site has a high degree of sensitivity in landscape

terms and an accordingly low capacity to accommodate new employment-related development.

This being the case, development proposals must be planned with very careful attention to the site's visual and physical relationship with the AONB, responding to the site's topography and natural landscape features in terms of the scale, design, siting, use, orientation, levels and lighting of buildings and associated development will be defined alongside infrastructure and landscaping requirements.

To achieve a high quality scheme in this prime location, a campus style development will be delivered in a parkland setting. This will be created through the retention and enhancement of existing tree and hedge belts, including those subject to tree preservation orders TPO 19 of 2007 & TPO 17 of 2007, and substantial additional structural landscaping within the site in the form of shaws and woodland blocks. This should include the retention and reinforcement of the streamside vegetation. Landscape buffers will also be established along the principal site boundaries, including to help provide a setting to the Grade II listed Woodcut Farmhouse and to help secure the residential amenity of nearby residential properties.

Buildings will cover no more than 40% of the site. This figure excludes the western most field, of some 9ha in area, which is reserved as an undeveloped area to include an enhanced landscape buffer to establish a clear and strong boundary between the development and the wider countryside to the east of Bearsted.

The flatter area of the site, to the east of the stream, is better able to accommodate larger footprint buildings up to 10,000sqm with heights restricted to a maximum of 14m. To the west of the stream the land rises and is suited to smaller footprint buildings up to 8m in height. The siting, scale and detailed design of development within this area must also have particular regard to the setting of Woodcut Farmhouse (Grade II listed)

There are archaeological remains in the immediate vicinity of the site, including an Anglo-Saxon burial site. Measures appropriate to the actual archaeological value of the site, revealed by further survey as needed, will be addressed. There are no statutory or non-statutory sites of nature conservation importance within the site and the County Ecologist advises that the potential for impacts on designated sites is limited. As is normal practice for a proposal of this nature, an ecological scoping study will be required to establish the presence of, and potential for, any impacts on protected species.

Vehicular access to the site will be taken from the A20 Ashford Road and a Transport Assessment will identify the scope of improvements required to the junctions (and associated approaches) at:

- the M20 Junction 8 (including the west-bound on-slip and merge);
- the A20 Ashford Rd/M20 link road roundabout;
- the A20 Ashford Rd/Penford Hill junction;
- the A20 Ashford Rd/Eyborne Street/Great Danes Hotel access; and
- the Willington Street/A20 Ashford Rd junction.

The site is located on a bus route (A20) but without significant additional dedicated measures it is highly likely that workers and visitors travelling to and from the site will be highly reliant on their private cars. A Travel Plan will be required to demonstrate how development will deliver significantly improved access by sustainable modes, in particular by public transport but this could also include cycling, walking and car share initiatives.

Policy EMP1(x) - Land at Woodcut Farm

Land at Woodcut Farm as identified on the policies map is allocated for mixed employment development. The site will provide up to 49,000sqm of mixed employment floorspace comprising light industry (B1c), general industry (B2) and high quality offices (B1a) with distribution/warehousing (B8).

The employment, landscaping and infrastructure elements will be delivered in an integrated and co-ordinated manner that respect the site's visual and physical relationship with the North Downs AONB. :

Planning permission will be granted if the following criteria are met.

Design & layout

1. The proposals create a spacious parkland setting for development through the addition of substantial internal landscaping which will help to break up the visual appearance of the development in particular in views from the AONB; buildings will cover not more than 40% of the developed site area;
2. Landscape buffers of at least 15m in width are established along the site's boundaries to M20 and to Musket Lane which will also to help secure the setting to Woodcut Farmhouse (Grade II listed) and the amenity of residential properties at Chestnuts and White Heath. Development will have a landscaped frontage to A20;
3. An area of 9ha to the north and north west of Woodcut Farm is secured as an undeveloped landscape area including the addition of a landscape buffer of at least 30m along the eastern boundary. Future management of this area will be secured by means of legal agreement;
4. Larger footprint buildings are accommodated in the field to the east of the stream up to a maximum unit size of 10,000sqm with building ridge heights not to exceed 14m. Units should be orientated end-on to predominant views to and from the AONB;
5. Development on the field to the west of the stream comprises smaller units with graded building heights that take account of the site's topography with building ridge heights not to exceed 8m. The siting, scale and detailed design

of development must have regard to Woodcut Farmhouse (Grade II) and its setting ;

Landscape and ecology

6. The development proposals are designed to take into account the results of a landscape and visual impact assessment (LVIA) undertaken in accordance with the principles of current guidance. The assessment will specifically address the impact of development on views to and from the North Downs AONB escarpment.
7. The development proposals are designed to take account of the results of a phase 1 habitat survey and any species specific surveys that may as a result be necessary, together with any necessary mitigation and enhancement measures

Archaeology

8. The proposals are designed to take account of the archaeological interest on the site as revealed through appropriate survey.

Access

9. Vehicular access to the site will be from A20 Ashford Road.

Highways

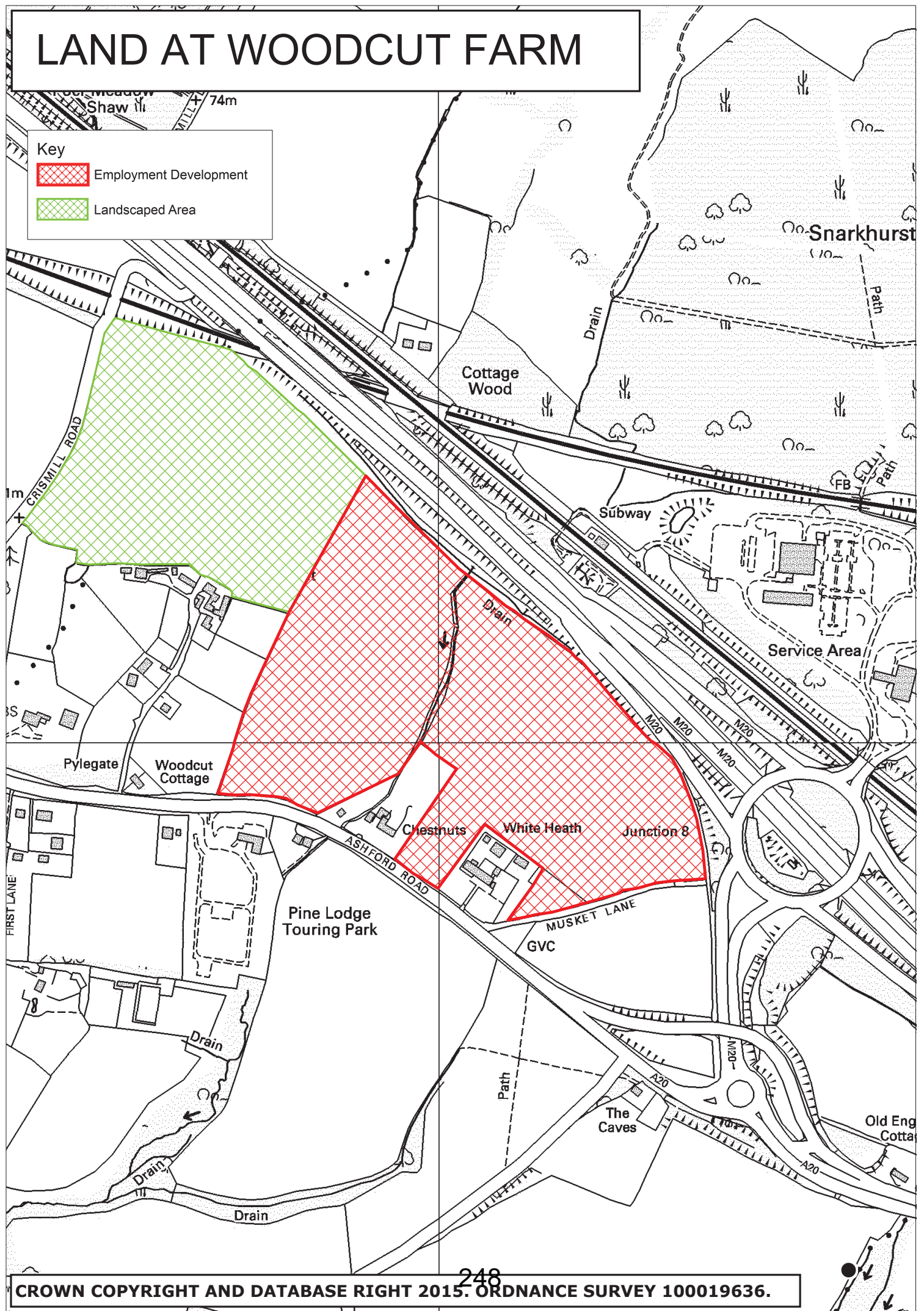
10. Development will contribute, as proven necessary through a Transport Assessment, to improvements at the following junctions:
 - i. the M20 Junction 8 (including the west-bound on-slip and merge);
 - ii. the A20 Ashford Rd/M20 link road roundabout;
 - iii. the A20 Ashford Rd/Penford Hill junction;
 - iv. the A20 Ashford Rd/Eyborne Street/Great Danes Hotel access; and
 - v. the Willingdon Street/A20 Ashford Rd junction.
11. Development will deliver a significant package of sustainable transport measures to secure access to the site by a range of sustainable modes and must be supported by the implementation of a Travel Plan.

LAND AT WOODCUT FARM

Key

 Employment Development

 Landscaped Area



Appendix D – schedule of detailed changes to Policies EMP1 (in addition to the proposed allocation of Woodcut Farm)

Site reference	Site name & address	Change	Reason
EMP1(1)	Mote Road, Maidstone	Revise site capacity to <u>up to</u> 8,000sqm.	A multi-storeyed development could achieve 8,000sqm floorspace however market demand is for smaller office units and such a scheme could see a lower amount of new floorspace generated on this site.

INTERIM SUSTAINABILITY FINDINGS: EMPLOYMENT SITE OPTIONS

1. SITE APPRAISAL METHODOLOGY

All site options have been subjected to SA utilising a strict ‘appraisal question’ based methodology. Site appraisal questions were developed to reflect the sustainability issues identified through SA scoping as far as possible – see Table 1; however, given data availability¹ the questions that it has been possible to pose are limited in scope.

This appraisal process is consistent with the site assessments that were undertaken at previous stages of SA.

Table 1: Scope of the site appraisal methodology

Sustainability topic	Appraisal criteria used	Comments / limitations
Housing	N/A	It is not appropriate to simply examine the size of sites as a proxy for the number of homes/affordable homes that could be delivered (taking into account the assumption that larger developments can deliver a higher proportion of affordable housing). This is on the basis that sites will often eventually be brought forward in combination.
Flooding	Is allocation of the site within a flood zone? Is the proposed use of the site appropriate in terms of guidance set out in the ‘Technical Guidance to the NPPF’ relating to flood risk? See table 3 (page 8) of the technical guidance.	Criteria do not establish the extent to which a site lays within flood zones or whether this portion could be avoided.
Health	Are there potential noise problems with the site – either for future occupiers or for adjacent/nearby occupiers arising from allocation of the site? How far is the site from the nearest children’s play space? How far is site from the nearest area of publicly accessible greenspace (>2ha in size)?	Criteria do not account for the quality of parks and play spaces. Nor do they account for the usage of facilities and potential over-capacity.
Poverty	Will allocation of the site result in employment-generating development in or close to (<2400m) deprived areas?	It is assumed that development can bring with it investment that will in turn help to facilitate an increase in prosperity locally / reduce spatial inequalities in terms of relative deprivation.
Education	How far is the site from the nearest secondary school? How far is the site from the nearest primary school?	It may have been possible to assess the potential for new development to impact on school capacity. However, in practice, developments will be required to provide enhanced school place provision to account for population growth in an area.
Crime	N/A	It is difficult to make a meaningful assessment of impacts on levels of crime at this scale.
Vibrant Community	N/A	It is not possible to determine how sites could affect involvement in community activities.

¹ Given the imperative of achieving consistency and transparency it is only possible to draw on data-sets for which data is available for each and every site option.

Sustainability topic	Appraisal criteria used	Comments / limitations
Accessibility	<p>How far is the site from the Maidstone Urban Area or a Rural Service Centre?</p> <p>How far is the site from the nearest medical hub or GP service?</p> <p>How far is the site from the nearest post office?</p> <p>How far is the site from the nearest outdoor sports facilities (i.e. playing pitch, tennis courts)?</p> <p>How far is the site from the nearest children's play space?</p> <p>How far is site from the nearest area of publicly accessible greenspace (>2ha in size)?</p>	<p>A major limitation relates to the fact that larger sites could have differing levels of accessibility.</p> <p>It is also important to note that all distances are „as the crow flies“ as it was not possible to take account of routes / pathways (e.g. the distance of the route that would be taken in practice when walking or travelling by car to reach a local centre).</p> <p>Criteria do not account for the quality of parks and leisure facilities. Nor do they account for the usage of facilities and potential over-capacity.</p>
Culture	N/A	It is not possible to determine how sites could affect cultural activities.
Land Use	<p>Will allocation of the site lead to loss of the best and most versatile agricultural land?</p> <p>Will allocation of the site make use of previously developed land?</p>	Agricultural land classification uses historical data. The criteria does not differentiate between Grade 1, 2 and 3a/3b agricultural land. However, a description of each 'score' is provided in the individual site proformas to explain the site characteristics in further detail.
Congestion	<p>How far is the site from the nearest bus stop?</p> <p>How far is the site from the nearest train station?</p> <p>Is the site within or near to an AQMA?</p>	<p>Different parts of a larger site may not be as accessible as others.</p> <p>Measuring 'as the crow flies' is not wholly representative of actual routes and distances.</p>
Climate Change	N/A	<p>The ability of development to adopt building integrated low carbon technologies is not affected by location.</p> <p>Suitability for district energy schemes has not been established for each site</p>
Biodiversity	<p>Is the allocation of the site likely to impact upon an Ancient Woodland (AW) or Ancient Semi-Natural Woodland (ASNW)?</p> <p>Is the allocation of the site likely to impact upon a Site of Special Scientific Interest (SSSI)?</p> <p>Is the allocation of the site likely to impact upon a Local Wildlife Site (LWS) or Local Nature Reserve (LNR)?</p>	<p>Distance to wildlife sites is not the only indicator of a potential impact. For example, scale of development is not accounted for. A smaller allocation could be closer to a site and have fewer impacts than a much larger scale location that is further away.</p> <p>Distance is measures from site boundaries.</p>

Sustainability topic	Appraisal criteria used	Comments / limitations
Countryside and Heritage	<p>Is the allocation of the site likely to impact upon a Scheduled Ancient Monument (SAM)? Listed Building? Conservation Area?</p> <p>Does the site lie within an area with significant archaeological features/finds or where potential exists for archaeological features to be discovered in the future?</p> <p>Is the site located within or in proximity to and/or likely to impact on the Kent Downs AONB?</p> <p>Is the site in the Green Belt? If so, is the allocation of the site likely to cause harm to the objectives of the Green Belt designation?</p> <p>Would development of the site lead to any potential adverse impacts on local landscape character for which mitigation measures appropriate to the scale and nature of the impacts is unlikely to be achieved?</p> <p>What is the Landscape Capacity to Accommodate Change?</p>	<p>Ideally, it would be desirable to establish the extent and sensitivity of different character areas and to make an assessment of how each site option could impact upon local character.</p> <p>This information is available for some sites (as taken from detailed Landscape Character Assessments 2014).</p> <p>However, for some sites, this information has been inferred using broader level landscape characterisations and officer views.</p> <p>Where a detailed site assessment has been undertaken as part of the 2014 landscape study, this replaces the assessment made at previous stages of appraisal using broad character areas in the 2012 landscape assessment.</p> <p>Proximity to heritage features is measured from site boundaries.</p>
Waste	N/A	
Water Management	N/A	Ideally, the potential impact of sites on water quality would be established. However, it is difficult to quantify impacts based purely on distance.
Energy	N/A	
Economy	<p>How accessible is the site to local employment provision (i.e. employment sites or the nearest local service centre?)</p> <p>Will allocation of the site result in loss of employment land/space?</p>	NB: Employment land is often somewhat substitutable, i.e. can be possible to develop other sites for the same or similar employment use.

Tables 2 and 3 present a concise list of the appraisal questions posed, along with the 'decision rules' used to categorise performance. A **red** categorisation equates to the prediction of a 'significant constraint', an **amber** categorisation equates to the prediction of a 'potentially significant constraint', and a **green** categorisation equates to the prediction of 'no constraint'.

The decision rules are quantitative. This allows for the analysis of the sites to be undertaken using Geographical Information System (GIS) software. No qualitative information / professional judgement has been drawn on when categorising sites as **red**, **green** or **amber**. Where subjective judgement has been used, this is highlighted.

Most of the rules are distance related. It is important to note that all distances are 'as the crow flies' as it was not possible to take account of routes / pathways (e.g. the distance of the route that would be taken in practice when walking or travelling by car to reach a local centre). Most distance rules have been developed internally by the plan-making / SA team, following a review of thresholds applied as part of Site Allocation / SA processes elsewhere in England. A number of thresholds reflect the assumption that 400m is a distance that is easily walked by those with young children and the elderly.

Table 2: Site appraisal questions and decision rules

Criteria	Scoring
Accessibility	
How far is the site from the Maidstone Urban Area or a Rural Service Centre?	<p>R = Not adjacent to the Maidstone Urban Area, or a rural service centre and would not be more accessible to services even if other sites were allocated</p> <p>A = Adjacent to the Maidstone Urban Area or a rural service centre, or could be more accessible to services if other sites allocated as well</p> <p>G = Within the Maidstone Urban Area or a rural service centre</p>
How far is the site from the nearest medical hub or GP service?	<p>R = >800m</p> <p>A = 400m – 800m</p> <p>G = <400m</p>
How far is the site from the nearest secondary school?	<p>R = >3900m</p> <p>A = 1600-3900m</p> <p>G = <1600m;</p>
How far is the site from the nearest primary school?	<p>R = >1200m</p> <p>A = 800-1200m</p> <p>G = <800m;</p>
How far is the site from the nearest post office?	<p>R = >800m</p> <p>A = 400m – 800m</p> <p>G = <400m</p>
How far is the site from the nearest outdoor sports facilities (i.e. playing pitch, tennis courts)?	<p>A = >1.2km</p> <p>G = <1.2km</p>
How far is the site from the nearest children's play space?	<p>A = >300m from 'neighbourhood' children's play space</p> <p>G = <300m</p>
How far is site from the nearest area of publicly accessible greenspace (>2ha in size)?	<p>A = >300m (ANGST)</p> <p>G = <300m</p>
Economy	
How accessible is the site to local employment provision (i.e. employment sites or the nearest local service centre?)	<p>R= >2400m</p> <p>A = 1600-2400m</p> <p>G = <1600m</p>
Will allocation of the site result in loss of employment land/space?	<p>R = Allocation will lead to significant loss of employment land/space</p> <p>A = Allocation will lead to some loss of employment land/space</p> <p>G = Allocation will not lead to the loss of employment land/space</p>
Will allocation of the site result in employment-generating development in or close to (<2400m) deprived areas?	<p>A = Not within or close to the 40% most deprived Super Output Areas within the country, according to the Index of Multiple Deprivation, 2010.</p> <p>G = Within or close to the 40% most deprived Super Output Areas within the country.</p>

Criteria	Scoring
Transport and accessibility	
How far is the site from the nearest bus stop?	R = >800m A = 400 - 800m G = <400m
How far is the site from the nearest train station?	R = >800m A = 400 - 800m G = <400m
How far is the site from the nearest cycle route?	R = >800m A = 400 - 800m G = <400m
Landscape, townscape and the historic environment	
Is the allocation of the site likely to impact upon a Scheduled Ancient Monument (SAM)?	A = On a SAM OR Allocation will lead to development adjacent to a SAM with the potential for negative impacts G = Not on or adjacent to a SAM and is unlikely to have an adverse impact on a nearby SAM.
Is the allocation of the site likely to impact upon a listed building?	A = Contains or is adjacent to a listed building and there is the potential for negative impacts. G = Not on or adjacent to a listed building and is unlikely to have an impact on a nearby listed building.
Is the allocation of the site likely to impact upon a Conservation Area?	A = Within or adjacent to a Conservation Area and there is the potential for negative impacts. G = Not within or adjacent to a Conservation Area and is unlikely to have an impact on a nearby listed building.
Does the site lie within an area with significant archaeological features/finds or where potential exists for archaeological features to be discovered in the future?	A = Within an area where significant archaeological features are present, or it is predicted that such features could be found in the future. G = Not within an area where significant archaeological features have been found, or are likely to be found in the future. N = No information available at this stage
Is the site located within or in proximity to and/or likely to impact on the Kent Downs AONB?	A = In close proximity to the Kent Downs AONB and/or there is the potential for negative impacts. G = Not in close proximity to the Kent Downs AONB and/or negative impacts on the AONB are unlikely.
Is the site in the Green Belt? If so, is the allocation of the site likely to cause harm to the objectives of the Green Belt designation?	A = Within or adjacent to the Green Belt and development could potentially cause harm to the purposes of the Green Belt designation and/or its openness G = Not within or adjacent to the Green Belt
Would development of the site lead to any potential adverse impacts on local landscape character for which mitigation measures appropriate to the scale and nature of the impacts is unlikely to be achieved? <i>*Determined through 2012 Landscape Character Assessment</i>	R = Likely adverse impact (taking into account scale, condition and sensitivity issues), which is unlikely to be appropriately mitigated A = Likely adverse impact (taking into account scale, condition and sensitivity issues), which is likely to be appropriately mitigated G = Opportunity to enhance landscape character or there is unlikely to be an adverse impact
Landscape Sensitivity <i>*Determined through Maidstone Landscape Capacity Study (2014)</i>	R = Low capacity to accommodate change A = Moderate capacity to accommodate change G = High capacity to accommodate change

Criteria	Scoring
Air quality and causes of climate change	
Are there potential noise problems with the site – either for future occupiers or for adjacent/nearby occupiers arising from allocation of the site?	A = Potential adverse impact G = Unlikely adverse impact N = No information available at this stage
Is the site within or near to an AQMA?	R = Within or adjacent to an AQMA A = <1km of an AQMA G = >1km of an AQMA
Land use	
Will allocation of the site lead to loss of the best and most versatile agricultural land?	A = Includes Grade 1, 2 or 3 agricultural land G = Does not include 1, 2 or 3 agricultural land
Will allocation of the site make use of previously developed land?	R = Does not include previously developed land A = Partially within previously developed land G = Entirely within previously developed land
Flood Risk	
Is allocation of the site within a flood zone?	R = Flood risk zone 3b A = Flood risk zone 2 or 3a G = Flood risk zone 1
Is the proposed use of the site appropriate in terms of guidance set out in the 'Technical Guidance to the NPPF' relating to flood risk? See table 3 (page 8) of the technical guidance.	R = Development should not be permitted A = Exception test is required G = Development is appropriate
Biodiversity and Green Infrastructure	
Is the allocation of the site likely to impact upon an Ancient Woodland (AW) or Ancient Semi-Natural Woodland (ASNW)?	R = Includes AW/ASNW A = <400m from an AW/ASNW G = >400m
Could allocation of the site have a potential adverse impact on a SSSI?	A = Potential impacts identified by County Ecologist G = No likely impacts identified at this stage.
Could allocation of the site have a potential adverse impact on a designated Local Wildlife Site or Local Nature Reserve?	A = Potential impacts identified by County Ecologist G = No likely impacts identified at this stage.

2. SITE APPRAISAL FINDINGS

Detailed site proformas have been produced for each site, which present the site scores against each of the site appraisal criteria included in table 2.

The following tables present a summary of these SA findings for the two site options at Junction 8 of the M20 as set out in the Report to Cabinet.

Site ID	Site Name	Location	Access to centres	Access to GP or medical hub	Access to Secondary School	Access to Primary School	Proximity to Post Office	Proximity to outdoor sports	Proximity to play space	Proximity to greenspace	Proximity to employment sites	Loss of employment land?	Proximity to bus stop	Proximity to train station	Cycle routes	Noise	Air quality	Agricultural land	Land use	Scheduled Ancient Monument	Listed Building	Conservation Area	Archaeology	Kent Downs AONB	Green Belt	Landscape character assessment	Landscape capacity to change (2014)	Flood zone	Flood risk	Ancient woodland	SSSI	Local Wildlife sites
ED - 6	Waterside Park, Ashford Road	Junction 8, M20	Red	Red	Red	Yellow	Red	Green	Yellow	Green	Yellow	Green	Yellow	Red	Red	Green	Green	Yellow	Red	Green	Yellow	Green	Yellow	Yellow	Green	Green/Yellow	Red	Green	Green	Yellow	Green	Yellow
ED - 12	Woodcut Farm, Ashford Road	Junction 8, M20	Red	Red	Red	Red	Red	Green	Yellow	Green	Yellow	Green	Green	Red	Red	Green	Green	Yellow	Red	Green	Yellow	Green	Yellow	Yellow	Green	Green/Yellow	Red	Green	Green	Yellow	Green	Yellow

* Although 5.5% of the site is in flood zone 3b.

STRATEGIC PLANNING, SUSTAINABILITY & TRANSPORT COMMITTEE

MEETING 18TH AUGUST 2015

URGENT UPDATE REPORT

Re Item 19 – Employment Land Allocations

Councillors were sent an email on 13th August by Nick Yandle, Chief Executive of the Gallagher Group, concerning the Waterside Park site. The email is appended to this note.

In addition to the content of the officers' covering report for item 19, I would like to bring the Committee's attention to the following points:

1. The Waterside Park and Woodcut Farm sites were assessed individually and also compared to one another as part of the Strategic Sites' consultation in 2012. Detailed site proformas were completed for each site and were published as part of the Strategic Sites consultation. The assessment of the Woodcut Farm site specifically referred to relevant parts of the KIG Inspector's decision letter. The comparative assessment concluded that Woodcut Farm would be the more suitable of the sites to allocate.
2. The Inspector for the Waterside Park appeals distinguishes between the direct effects on the landscape and the visual impacts of development. In respect of the direct effects, she notes;

In the longer views from the AONB it is true that there is little that is distinctive about the landform of the site and it can only really be identified by reference to the tower of the hotel and the containers on the Biffa site. There seems to me, however, to be precisely why the developments would cause harm to both the visual and landscape qualities of the surroundings. The site does not, at present, draw the eye and is seen as part of a homogeneous wider vista and this would change, as described above, if the proposed developments went ahead. (paragraph 32, emphasis added)

Dear Sir / Madam,

Ref: Waterside Park, Junction 8

We apologise for writing to you further on this subject as you must be receiving a plethora of communication about it, however this is plainly an important subject to many of us for a variety of reasons.

A few days ago dha, our planning consultant, sent you a note with our revised outline proposal for Waterside Park that takes into consideration the Inspector's decision on the recent Appeals.

We have now reviewed in detail the papers going to the Strategic Planning, Sustainability and Transportation Committee meeting to be held on 18th August, item 19 of which proposes allocation of Woodcut Farm, an alternative site at Junction 8 on part of what was the KIG site.

The reports give rise to some fundamental points worthy of serious consideration;

1. Woodcut Farm is acknowledged to have virtually all the features of Waterside Park. On the positive side, satisfying the need for employment land and on the negative side having implications on landscape and heritage.
2. The Site Appraisal exercise (see the table in the Report with traffic light colouring) shows scoring for the 2 sites to be identical except for one item where Waterside is better than Woodcut and one where the reverse is true (this pertains to a bus stop which is easily addressed).
3. The report refers to the Council's 2013 Landscape Character Assessment, but fails to note that the area within which Woodcut sits is considered to be of better landscape condition than Waterside Park ('Very Poor').
4. Significant weight has effectively been given in the Report to the fact there has been no recent examination of Woodcut Farm in a planning committee or an appeal (and there is no mention of the KIG decision). There has been no proper consideration of how the conclusions reached by the Inspector at Waterside might then apply to Woodcut Farm. To favour an alternative site simply because it hasn't been tested in the planning process in the fashion that Waterside has is perverse. Our revised proposals positively address the concerns that arise from that test.
5. The report erroneously states that any scheme at Waterside Park would involve "significant alteration to the landform". This is not true – development on the smaller scale now proposed reduces changes in the land form by approximately 85% compared with the previous proposals.
6. The constructive and helpful guidance in appendix B of the Report on how development at Woodcut might be designed and controlled to mitigate the negatives would apply virtually word for word for Waterside Park with one major exception – the revised Waterside proposal is now roughly half the size of Woodcut. Why not carry out the same exercise on Waterside?

It is rather unimaginative to simply dismiss any development at Waterside Park because 2 larger schemes (one supported by Officer recommendation to approve) failed at Inquiry. This misses an

opportunity to develop a different, more palatable scheme that nevertheless goes some significant way to delivering the quality and quantity of employment land shown to be needed.

We reiterate that Waterside cannot creep in size and add that it has the potential to assist with delivery of the Leeds-Langley by pass, should that feature in the Council's strategic planning. The by-pass is of no benefit to us, however some sort of zone for it could be incorporated into the planning of Waterside if the Council considered it appropriate.

Planning is usually a compromise, balancing important competing issues - in this case employment and landscape / heritage, and we hope you would agree that our proposals represent the best and most balanced outcome benefitting from scrutiny at the recent Appeal.

We would be pleased to assist if you have any queries.

Yours sincerely,

Nick Yandle

Strategic Planning, Sustainability & Transport Committee

18th August 2015

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

Yes

Maidstone Borough Local Plan – Gypsy & Traveller site allocations

Final Decision-Maker	Strategic Planning, Sustainability & Transport Committee
Lead Director or Head of Service	Rob Jarman, Head of Planning & Development
Lead Officer and Report Author	Sarah Anderton, Principal Planning Officer (Spatial Policy)
Classification	Non-exempt
Wards affected	All wards

This report makes the following recommendations to the final decision-maker:

1. That the Committee approves the officer responses to the representations submitted during the public consultation on the draft Maidstone Borough Local Plan (Regulation 18) for Policy GT1 Gypsy & Traveller Site allocations, set out in Appendix A.
2. That the Committee approves the amendments to Policy GT1 set out in Appendix B for incorporation into the Regulation 19 version of the Maidstone Borough Local Plan.
3. That the Committee approve the additional Gypsy & Traveller site allocations set out in Appendices C and D for Regulation 18 stage public consultation.

This report relates to the following corporate priorities:

- Keeping Maidstone Borough an attractive place for all

Timetable

Meeting	Date
Strategic Planning, Sustainability & Transport Committee	18 August 2015

Maidstone Borough Local Plan – Gypsy & Traveller site allocations

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 This report responds to, and proposes changes to, the Gypsy site allocations contained in Policy GT1 of the Maidstone Borough Local Plan in response to the representations made during the Regulation 18 public consultation completed in May 2014. It recommends that the proposed policy changes be agreed for inclusion in the Regulation 19 version of the Local Plan.
- 1.2 The report also recommends that nine additional sites be approved for Regulation 18 stage public consultation.

2. INTRODUCTION AND BACKGROUND

- 2.1 As with conventional housing, there is a need for additional Gypsy and Traveller pitches and Travelling Showpeople plots in the borough which the Local Plan must address for the period up to 2031¹. The number of additional pitches/plots needed is evidenced in the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (“the GTAA”) for Maidstone undertaken by the University of Salford, published in January 2012. The same methodology for assessing need has been followed in the equivalent studies undertaken by all the Kent authorities. In short, the need for pitches/plots arises from unauthorised sites, sites with temporary consent (where planning permission is time limited), overcrowded and concealed households, movements between bricks & mortar housing and sites and natural household growth.
- 2.2 The need for pitches/plots in Maidstone Borough 2011-31 is as follows:

	2011-16	2016-21	2021-26	2026-31	Total
Gypsy & Traveller Pitches	105	25	27	30	187
Travelling Showpeople Plots	7	1	1	2	11

- 2.3 As part of the preparation of the Regulation 18 Local Plan, a call for potential Gypsy and Traveller sites was included as part of the overall Call for Sites undertaken in 2012/13. The sites submitted were assessed for their suitability for allocation in the Local Plan. In parallel, a review of unauthorised sites and sites with temporary permission was undertaken to determine which could also be suitable for allocation. The outcome of this work was that seven sites with capacity for some 23 additional permanent pitches were allocated in Policy GT1 in the Regulation 18 Local Plan.

¹ Original study covers 2011-26. Findings have been updated to 2031

- 2.4 The issues raised in the representations and proposed responses to them are set out in the table in Appendix A.
- 2.5 Specific parish councils (Headcorn, Ulcombe, Stockbury) are of the strong opinion that their parishes have an existing high number of Gypsy sites and that a more numerically even distribution of sites across the borough should be achieved.
- 2.6 In response, it is the case that existing pitches are not distributed evenly across the borough. To an extent, this reflects historic patterns when Gypsy families were involved in local agriculture but also it reflects the fact that the distribution of key planning constraints such as Green Belt and AONB² are themselves not equally distributed across the borough. National planning policy in Planning for Traveller Sites does refer to councils ensuring 'sites in rural areas respect the scale of, and do not dominate, the nearest settled community'³. Whilst some local residents strongly believe that the threshold of 'domination' has already been met in some parts of the borough, in practice, Inspectors frequently test this against the capacity of local infrastructure (schools, medical facilities, for example) and are not supporting it as an argument at appeal, particularly when they must also give weight to the overall shortfall in the supply of Gypsy sites.
- 2.7 Also, the achievement of some alternative distribution of Gypsy sites is crucially dependant on there being alternative suitable sites which are demonstrably available for Gypsy and Traveller accommodation. Despite concerted efforts, explained further below, a choice of such sites has not come forward.
- 2.8 Some residents expressed their frustration at an apparent lack of control over unauthorised Gypsy sites. In response, the role of the Local Plan is to positively identify suitable sites. By having an adopted Local Plan in place which successfully does this, the Council's position will be significantly strengthened in trying to resist development on unsuitable sites.
- 2.9 Parish councils and residents are concerned that previous appeal decisions are being overturned by including three specific sites in Policy GT1, namely GT1(2) – Little Boarden, Headcorn, GT1(3) – The Chances, Hunton and GT1(4) Hawthorn Farm, Ulcombe. The officer responses in Appendix A include the planning history of these sites and reaffirms why their allocation is judged appropriate. A general point in response is that sites have had to be assessed in the face of the challenging need to identify additional pitches as well as a more recent assessment of the impacts of development based on the current conditions on site to determine whether or not the issues identified in earlier appeals still apply to an over-riding extent.
- 2.10 The Kent Downs AONB Unit object that three sites (GT1(5) - Cherry Tree Farm, GT1(6) – Flips Hole and GT1(7) - The Ash) will not preserve or enhance the AONB. These are all established sites which benefit from established screening such that, it is judged, the impact on the AONB will be low. Further, the policy

² See NPPF footnote 9 in paragraph 14

³ paragraph 23

criteria for these sites specify the additional landscaping which will further mitigate the visual impact on the AONB.

2.11 The Committee is recommended to approve the responses set out in Appendix A and the detailed changes to Policy GT1 set out in Appendix B.

2.12 In the knowledge that the allocation of the sites in Policy GT1 would still result in a shortfall against the evidenced need, Cabinet⁴ agreed that a further Call for Gypsy Sites should be undertaken at the same time as the call for additional housing sites in early 2014. As the response to this was also limited, other routes had to be explored to identify suitable, available sites. The NPPF requires councils to plan positively and indeed this is one of the tests of soundness which the Local Plan will be tested against at Examination. It will be important to be able to demonstrate to the Local Plan Inspector the Council has been pro-active in its efforts to meet evidenced needs by showing that all reasonable options have been explored.

2.13 The sources and numbers of sites that have been reviewed are;

- | | |
|---|------------------------|
| a) Sites submitted in the 2014 call for sites as Gypsy sites or where Gypsy development was identified by the landowner as a potential option | 7 sites |
| b) Sites rejected for housing, mixed use and employment in the 2013 SHLAA/SED LAA | 135 sites |
| c) Sites rejected for housing in the 2014 SHLAA | 85 sites ⁵ |
| d) Sites previously considered for the proposed public Gypsy site | 108 sites ⁶ |
| e) Existing permanent Gypsy sites | 98 sites ⁷ |

2.14 **Availability:** In addition to sites being suitable in planning terms for Gypsy pitches, it is also important that the land is also available for this use. By this means they can be regarded as genuinely deliverable under the terms of the NPPF.

2.15 To test availability, the following process was followed;

- a) The sites that were put forward through the 2014 call for Gypsy sites have been regarded as available, or in some cases, potentially available on the basis that they had been submitted by the landowner.
- b) & c) For rejected SHLAA/SED LAA sites, landowners were contacted and asked to confirm or otherwise the availability of their land in the event that a planning assessment found their site to be suitable for Gypsy use.

⁴ 24th February 2014

⁵ Excludes sites duplicated in other categories

⁶ Excludes sites duplicated in other categories

⁷ Excludes sites duplicated in other categories

- d) For those public site candidates where landownership was known, the approach was the same as for the rejected SHLAA/SEDLAA sites. In some cases however landownership was not known so it was not possible to confirm availability (or otherwise) at the outset. Such sites with unconfirmed availability were progressed forward for site suitability testing so as not to delay the overall assessment process.
 - e) In the case of existing permanent Gypsy sites, Kent County Council Gypsy & Traveller Unit was employed to visit sites and ask the owners about availability..
- 2.16 In all approaches, it was made clear that the request for availability information did not imply that any individual site would prove suitable for additional pitches.
- 2.17 **Suitability:** The sites in categories (b) to (d) above had all had some form of site suitability assessment in the past, either through the SHLAA or through the public site assessment process. Based on this prior assessment, it was possible to identify at an early, first stage that some sites would also be unsuitable for private Gypsy accommodation because the previous analysis identified significant or multiple planning constraints. Similarly, some of the existing permanent sites ((e) above) were identified as unsuitable for additional pitches at an early, first stage based on a review of their recent planning history and/or knowledge of physical limits to the size/capacity of the site.
- 2.18 As a result of the work outlined above, there was a balance of some 56 candidate sites requiring further, more detailed assessment. These sites were ones:
- Where availability was confirmed or where non-availability had not been resolved conclusively, and
 - which had not been found to be unsuitable based on a first stage assessment using existing information
- 2.19 For the new and existing site candidates ((a) and (e) above), sites were assessed using the proforma previously agreed by the Cabinet Member for Planning Transport and Development. For the remaining categories of sites, which have all had a planning assessment in the past, an addendum assessment form was completed specifically focusing on the suitability of the site for private Gypsy and Traveller accommodation. The views of KCC Highways, KCC Ecology and the Environment Agency were incorporated into the assessments of the candidate sites.
- 2.20 The 56 candidate sites have been subject to a Sustainability Appraisal (SA) by the independent expert consultants, AECOM (formerly URS). The SA provides a comparative analysis of the candidate sites, testing them against agreed sustainability criteria. The SA does not over-ride the planning assessment of the individual sites but rather it provides framework against which to check the conclusions emerging from the site assessments. A summary of the comparative analysis is included in Appendix D hereto. A theme across the SA assessment is the relatively poor scores that existing sites register for access to services and facilities and access to public transport as the sites are generally

situated in less accessible countryside locations. Current and future occupants of these sites are more likely to rely on their private cars to reach key services and facilities. This outcome needs to be balanced against the overall benefits of making positive site allocations which will contribute towards the identified need for additional Gypsy pitches coupled with the lack of confirmed availability of suitable sites in more accessible locations.

- 2.21 The outcome of the overall assessment process is that nine additional sites are recommended for inclusion in the Local Plan for Regulation 18 public consultation. Each of these sites is an existing site with permanent permission where additional pitches are considered appropriate. In the case of Blossom Lodge, this site was specifically put forward by the landowner in the Call for Sites. .

Ref	Site	Additional permanent pitches
GT1(8)	Kilnwood Farm, Old Ham Lane, Lenham	+2
GT1(9)	The Kays Heath Road, Boughton Monchelsea	+1
GT1(10)	Greenacre (Plot 5), Church Hill, Boughton Monchelsea	+1
GT1(11)	Chart View, Chart Hill Road, Chart Sutton	+2
GT1(12)	Neverend Lodge, Pye Corner, Ulcombe	+1
GT1(13)	The Paddock, George Street, Staplehurst	+2
GT1(14)	Bluebell Farm, George Street, Staplehurst	+2
GT1(15)	Land r/o Granada, Lenham Road, Headcorn	+1
GT1(16)	Blossom Lodge, Stockett Lane, Coxheath	+6 ⁸
	Total	18

- 2.22 For the Chart View and Neverend Lodge sites (GT1(11) and (12)), the SA records that development is likely to have an adverse impact on local landscape character which is unlikely to be appropriately mitigated. This scoring stems directly and exclusively from the Council's Landscape Character Assessment; the wider character areas into which these sites fall have 'very good' condition and 'high' sensitivity. The sites themselves however are well screened and are not subject to long range views. It is not considered that their development as proposed would have undue impact on rural or landscape character.

3. AVAILABLE OPTIONS

- 3.1 Option 1: The Committee could decide not to include any additional sites in the Local Plan. The disadvantage of this is that the Council would not be planning positively towards meeting the identified need for additional pitches. It would constrain the Council's ability at the Local Plan Examination to demonstrate that it had explored and exploited all reasonable options to identify suitable, available sites in the face of the significant need for additional pitches. The Inspector will be cognisant that national guidance in Planning for Traveller Sites directs that needs should be met through the allocation of land for sites⁹. These same considerations will be applied by neighbouring authorities in considering

⁸ 2 of the 6 pitches are subject to a current application (12/1209)

⁹ Paragraph 4

any future approach from this Council under the Duty to Co-operate. Other authorities will expect the Council to demonstrate through evidence why additional sites cannot be accommodated in the borough. As with conventional housing, Councils are also required to be able to demonstrate a five year forward supply of Gypsy sites and this will be best achieved by allocating sites in the Local Plan.

- 3.2 Option 2: The Committee could decide not to include any additional sites and that instead another dedicated call for Gypsy sites should be undertaken to try to identify further suitable and available sites. It is considered, however, that a further call for sites is likely to have limited additional benefit as there have been sufficient and repeated occasions for landowners and the Gypsy community to put forward sites. Further, contact with those who had put forward sites to the SHLAA showed only very limited interest in Gypsy development with 131 out of 143 sites confirmed as unavailable. The first call for sites in 2013 also explicitly included planning agents who submit Gypsy planning applications in the borough and Gypsy representative bodies. As outlined above, the recent work undertaken by KCC G&T Unit made specific contact with resident Gypsies.
- 3.3 Option 3: The Committee could decide to proceed with a Regulation 18 public consultation on the recommended sites GT1(8) to (16). If additional sites were to come forward through this consultation process these could be assessed for inclusion in the Plan at Regulation 19 stage.

4. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS

- 4.1 It is recommended that the Committee select Option 3. This option best helps to maintain momentum with the Local Plan and also demonstrates some positive provision towards the Gypsy and Traveller community's identified needs.
- 4.2 Appendix C includes site allocation policies for each of the proposed sites. These policies provide specific criteria to guide the development of each site and specify a pitch capacity.
- 4.3 The table below sets out the supply position relative to needs with the inclusion of the proposed nine additional sites.

1	Pitch Requirement (2011-31) ¹⁰		187
2	Permanent consents granted 1/10/11 to 1/8/15	79	
3	Sites GT1(1)-(7) (Reg 18 Local Plan)	23	
4	Proposed additional sites GT1(8)-(16)	18 ¹¹	
5	Public pitch turnover (1.4pa for 16 years) ¹²	22	
6	Shortfall		45

¹⁰ 1st October 2011-31st March 2031

¹¹ Of which 2 pitches are subject to a current application

¹² based on the last 5 years' data

- 4.4 When account is also taken of the future supply that can be anticipated through pitch turnover on the two public sites in the borough, in addition to permanent permissions already granted and the proposed supply from allocations, the shortfall against needs would be some 45 pitches.
- 4.5 Councillors may also note that unauthorised sites and sites with temporary permissions were reviewed for their suitability for allocation as part of the preparation for the Regulation 18 version of the Local Plan.
- 4.6 There is also a need for 11 additional Travelling Showpeople plots in the borough between 2001 and 2031. The current need from seven plots (2011-16) directly arises from just two sites, both of them long standing sites on Detling Hill, one of which is unauthorised (a temporary consent was granted in 1953 but never renewed) and the other has four mobile homes above the consented number on site. The balance of the requirement for four plots from 2016 to 2031 is due to the projected natural household growth from the families on these sites. As the need arising is so specific to these two sites it is considered any regularisation of the current position (if required) and the need for additional pitches due to household growth can be most appropriately dealt with through the development management process. Policy DM26 of the Local Plan would provide the criteria by which future applications would be assessed.

5. CONSULTATION RESULTS AND PREVIOUS COMMITTEE FEEDBACK

- 5.1 Policy GT1 of the draft Maidstone Borough Local Plan was subject to public consultation between March and May 2014. The outcomes of that consultation are set out in this report and its appendices.

6. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION

- 6.1 Further Regulation 18 consultation is proposed on the additional Gypsy site allocations GT1(8) to GT1(16). Thereafter, a revision of the whole Local Plan will be subject to Regulation 19 consultation.

7. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
Impact on Corporate Priorities	The adoption of the Local Plan will assist in the delivery of the council's corporate priorities.	Head of Planning & Development.

Risk Management		[Head of Service or Manager]
Financial	There are no direct financial implications arising from the recommendations in this report. Ensuring the Local plan is based on sound evidence will minimise likelihood of avoidable cost being incurred.	Head of Finance & Resources
Staffing		[Head of Service]
Legal	No direct or immediate legal implications arising from the recommendations contained herein. Consultation in accordance with the Local Planning Regulations 2012 must take place on any inclusion/amendment to the local plan.	Kate Jardine, Team Leader (Planning), Mid Kent Legal Services
Equality Impact Needs Assessment		[Policy & Information Manager]
Environmental/Sustainable Development	The Local Plan is fundamentally concerned with delivering sustainable development objectives.	Head of Planning & Development
Community Safety		[Head of Service or Manager]
Human Rights Act		[Head of Service or Manager]
Procurement		[Head of Service & Section 151 Officer]
Asset Management		[Head of Service & Manager]

8. REPORT APPENDICES

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

- Appendix A : table of issues and responses raised in the representations to Policy GT1
- Appendix B: recommended amendments to Policy GT1
- Appendix C: site allocation policies for proposed sites GT1(8) to GT1(16)
- Appendix D: site plans
- Appendix E: Sustainability Appraisal

9. BACKGROUND PAPERS

APPENDIX A: schedule of issues and responses for Policy GT1

Policy Number GT1	General comments/objections to Policy GT1		
Summary of issues	Officer Response	Proposed change	
Support the policy (agent; resident; Medway Council)	Support welcomed	No change	
Should look at other sites with temporary consents given the difficulty in finding sites. (agent)	In the course of preparing the Regulation 18 draft Local Plan, all Gypsy sites with temporary consent were reviewed for their suitability for allocation.	No change	
Object to an increase in the number of sites for Gypsies & Travellers (residents); There is no current control over the number of sites (resident); Unauthorised sites should be dealt with before additional sites are proposed (resident)	<p>Just like for conventional housing, there is a need to provide additional lawful pitches to help meet the identified need for additional Gypsy and Traveller accommodation evidenced through the Gypsy & Traveller and Travelling Showpeople Accommodation Assessment. The Government is clear through its guidance in 'Planning for Traveller Sites' that it expects local authorities to identify appropriate sites to achieve a forward supply of sites and thereby give more certainty to both the settled and travelling community.</p> <p>By having an adopted Local Plan in place which successfully does this, the Council's</p>	No change	

Policy Number GT1	General comments/objections to Policy GT1		
Summary of issues	Officer Response	Proposed change	
	position will be significantly strengthened in trying to resist development on unsuitable sites.		
The need for additional pitches has been overstated. (resident; parish council; ward councillor). The borough has a disproportionate number of Gypsies; other local authorities should address this need (resident)	<p>The need for additional pitches is evidenced through the Gypsy & Traveller and Travelling Showpeople Accommodation Assessment for Maidstone (2012). The same methodology has been followed for all the assessments undertaken by Kent authorities. The GTTSAA tested for the extent to which resident Gypsies met the 'planning' definition of Gypsies and Travellers (with respect to their nomadic habit of life) and discounted for those who did not meet that definition.</p> <p>A factor in Maidstone's higher numbers of Gypsies compared with authorities to the west is that it does not have significant amount of Green Belt in which national policy governing Gypsy development is more restrictive.</p>	No change.	

Policy Number GT1	General comments/objections to Policy GT1		
Summary of issues	Officer Response	Proposed change	
	If the identified need is not able to be met in the borough, following thorough assessment of reasonable options, the Council will need to have 'Duty to Co-operate' discussions with nearby authorities about them potentially accommodating some of Maidstone's need. It is the case, however, that other authorities are not under any 'in principle' obligation to accommodate any of the need which arises in Maidstone borough.		
The policy caters for future generations of Gypsies and Travellers whereas the settled population cannot automatically find homes in the village they grew up in. (resident)	National planning policy for Gypsies and Travellers does allow for sites to be located in countryside locations.	No change	
Find an alternative permanent site for Gypsies and Travellers away from Headcorn (resident) . Headcorn has a disproportionate share of Gypsy sites (resident) . Sites should be more evenly distributed across the borough (parish council, Joint Parishes Group). The Local Plan should include planned gypsy and traveller pitches in the housing allocations to help spread the number around the Borough (parish council)	It is the case that existing Gypsy sites are not distributed evenly across the borough. To an extent this reflects historic patterns when Gypsy families were involved in local agriculture but also it reflects that the distribution of key planning constraints such as Green Belt and AONB which themselves are not	No change	

Policy Number GT1	General comments/objections to Policy GT1		
Summary of issues	Officer Response	Proposed change	
	<p>equally distributed across the borough. National planning policy in Planning for Traveller Sites does refer to councils ensuring 'sites in rural areas respect the scale of, and do not dominate, the nearest settled community' . Whilst some local residents strongly believe that the threshold of 'domination' has already been met in some parts of the borough, in practice Inspectors frequently test this against the capacity of local infrastructure (schools, medical facilities, for example) and are not supporting it as an argument at appeal, particularly when they must also give weight to the overall shortfall in the supply of Gypsy sites.</p> <p>The achievement of some alternative distribution of Gypsy sites is crucially dependant on there being alternative suitable sites which are demonstrably available for Traveller accommodation. Despite concerted efforts, a choice of such sites has not come forward.</p>		

Policy Number GT1	General comments/objections to Policy GT1		
Summary of issues	Officer Response	Proposed change	
	<p>Allocating Gypsy sites within housing allocations was previously publicly dismissed by the then Leader of the Council and in the meantime a significant proportion of the allocated housing sites have gained planning permission without such provision. When recently raised as an option with representatives of the Maidstone housebuilding industry, they claimed that such a policy would adversely affect the marketability of sites and would significantly deter investment. There is therefore some risk that such a policy would constrain the deliverability of the wider housing policies of the Local Plan.</p>		
<p>Concern that allocated sites will be sold on at an enhanced value (ward Councillor)</p>	<p>The site allocations in Policy GT1 are linked to suitability of the site in planning terms and are not an assessment of the specific personal requirements of the occupiers. As these sites are suitable for permanent occupation, there would be no objection in planning terms if they were to be sold to another Gypsy family.</p>	<p>No change</p>	

Policy Number GT1	General comments/objections to Policy GT1		
Summary of issues		Officer Response	Proposed change
		In real terms this is no different to what happens in the conventional housing market.	
Propose additional criteria to a) ensure necessary wastewater infrastructure is provided in parallel with development and b) development is adequately separated from existing wastewater facilities. (Southern Water)		a) this is a detailed matter which would be appropriately dealt with by way of a planning condition. b) this is not a specific issue for the sites which are allocated in Policy GT1	No change
Landscaping: <ul style="list-style-type: none">Each site should have a landscape scheme, developed in line with the Landscape Character Assessment, which will restore/create landscape features which contribute to landscape character.Features must be appropriately managedScreening should respect existing landscape character and be in an appropriate location(KCC)Large areas of hardstanding should be resisted (KCC)		Each site allocation policy specifies the landscaping requirements for the site. Maintenance of landscaping is a specific requirement of the allocation policies and measures to secure this will be a matter to be determined at the planning application stage. Policy SP5 – Countryside specifies that development in the countryside should take account of Landscape Character Guidelines supplementary planning document. The appropriate extent of hardstanding	No change.

Policy Number GT1	General comments/objections to Policy GT1		
Summary of issues	Officer Response	Proposed change	
	on any particular site is a detailed matter to be addressed at planning application stage.		

Policy Number GT1(2)	Site Name: Little Boarden, Boarden Lane, Headcorn		
Summary of issues	Officer Response	Proposed change	
Object (Joint Parishes Group). Appeal Inspector did not consider the site was suitable for permanent permission pending the identification of alternative sites (residents; ward councillor). Alternative sites to this one should be found (resident). Wishes of wider population are being ignored (resident)	<p>In the face of a significant need for Gypsy pitches, it is necessary that existing sites with temporary consent were reviewed for their suitability to be made permanent.</p> <p>One of the mobile homes on this site has permanent, personal consent (05/1681). Temporary consent was granted at appeal for a further 2 mobile homes (07/2248; U2235/A/08/2075195) on 24/10/08. The Inspector found that development would cause significant harm and that the impact could not be mitigated. Also that the site is not well</p>	<p>Amend criterion 2(i) to read:</p> <p>The retention and future maintenance of the existing landscaping along the north-west boundary, frontage to Boarden Lane as an effective screen to the development.</p>	

Policy Number GT1(2)	Site Name: Little Boarden, Boarden Lane, Headcorn		
Summary of issues		Officer Response	Proposed change
		<p>related to services and facilities. In the absence of alternative sites, the Inspector decided to grant a temporary permission. A subsequent application to vary conditions to make the permission permanent was submitted (12/1908). It was considered that whilst some of the vegetation had grown since the Inspector's decision, the mobile homes are still visible from some points on Boarden Lane, more so in the winter. It was determined that development would have unacceptable harm to the countryside . In the absence of alternative sites, temporary consent was granted.</p> <p>Sites with temporary consent reviewed as part of the preparation process for the Regulation 18 Local Plan. With the maturing of the landscaping in the intervening years, it is now considered that the landscape impact and harm to the wider street scene is now low but this is based on retention of the frontage</p>	

Policy Number GT1(2)	Site Name: Little Boarden, Boarden Lane, Headcorn		
Summary of issues	Officer Response	Proposed change	
	<p>hedgerow at a good height though there are clear views into the site through the access. The site is remote from services but its retention could be suitable.</p> <p>On review, the policy criteria should be revised to clarify that it is the screening to Boarden Lane which should be retained and maintained as part of the landscaping scheme which would be prepared in connection with an application for the site.</p> <p>On a point of note, Headcorn Parish Council has indicated support for this allocation in its emerging neighbourhood plan.</p>		
Support (parish council; resident)	Support welcomed	No change	

Policy Number GT1(3)	Site Name: The Chances, Lughorse Lane, Hunton		
Summary of issues	Officer Response	Proposed change	

Policy Number GT1(3)	Site Name: The Chances, Lughorse Lane, Hunton		
Summary of issues	Officer Response	Proposed change	
Object. Refusals upheld at appeal are being reversed (ward councillor)	<p>This site was subject to an enforcement appeal in 2007. The Inspector found that the development (1 mobile and 1 tourer) would result in significant harm to the character and appearance of the rural landscape. In absence of alternative sites, the Inspector resolved to grant temporary consent.</p> <p>The consent was renewed by 10/1336 for temporary period.</p> <p>Through application 11/1900, it was determined that the site was still visually intrusive and out of keeping with the surrounding countryside generally. However, the additional visual harm of a second mobile would be limited to the life of the temporary permission so on balance it was found to be acceptable. The site consequently has temporary permission for 2 mobiles (plus 1 tourer) under 11/1900 for one family unit (i.e. 1 pitch).</p>	No change	

Policy Number GT1(3)	Site Name: The Chances, Lughorse Lane, Hunton		
Summary of issues	Officer Response	Proposed change	
	<p>Faced with the scale of need has been necessary to look at all reasonable options to allocate sites, including existing sites such as this one with temporary consent.</p> <p>The landscape screening appears to have matured in recent years such that this site is not now prominent. It is set back from Lughorse Lane which helps reduce its impact and this gives opportunities for enhanced natural screening. There are no significant long range views such that on balance the site is considered to be sufficiently well screened to accommodate a small caravan site.</p> <p>The site is not to be confused with the adjoining site, north of the allocated site within the larger field to the north (known as plot 5 Lughorse Lane). An application for change of use to provide 2 plots for Gypsies on this neighbouring land (10/1542) was refused and the</p>		

Policy Number GT1(3)	Site Name: The Chances, Lughorse Lane, Hunton		
Summary of issues		Officer Response	Proposed change
		appeal dismissed.	
Site is adjacent to Ancient Woodland which is not mentioned in the description (KCC)		<p>To comply with the emerging format for site allocation policies (housing, employment, mixed use, Gypsy & Travellers) , introductory text will precede each of the site allocation policies in the Regulation 19 version of the Local Plan to provide a brief description of the site.</p> <p>Nine Acre Shaw is a block of ancient woodland lying to the south west of the allocated site, south of the access track. It is recommended that a criteria be added to the policy to ensure that the siting of development not within 15m of the ancient woodland to secure a sufficient buffer.</p>	<p>Additional Criterion under design and layout section’ of Policy GT1(3) to state</p> <p>“ the siting of development should ensure a 15m buffer between development and Nine Acre Shaw (ancient woodland) to the south west.</p>

Policy Number GT1(4)	Site Name: Hawthorn Farm, Ulcombe		
Summary of issues		Officer Response	Proposed change
Object (parish council; Joint Parishes Group). Refusals upheld at appeal are being reversed (ward councillor)		<p>The site was put forward for additional pitches through the Call for Sites in 2013. The planning history of the site is as follows:</p> <p>Planning permission was granted by the Council under 09/0208 in August 2010 for use of this site as an unrestricted permanent gypsy site. (2 mobiles and 2 tourers). The site is therefore an existing lawful Gypsy site.</p> <p>Prior to that, a high court injunction was obtained in March 2005 aimed at preventing the use of the site as a caravan site. Despite this the site was occupied and enforcement notices were served in June 2006 to secure the cessation of use as a caravan site and the removal of hardstandings and an earth bund. However, no appeals were lodged and eventually the residential use of the site ceased.</p> <p>The assessment of the site prior to its</p>	No change

Policy Number GT1(4)	Site Name: Hawthorn Farm, Ulcombe		
Summary of issues		Officer Response	Proposed change
		<p>inclusion in the Regulation 18 Plan concluded that views from higher land to the north would be interrupted to an extent by the various intervening field boundaries. The site is more exposed in views from the south and west and it is clearly visible in short distance views from the public footpath close to the site entrance. Longer distance views from the public footpath are partially screened by hedging along the north side of the footpath. The existing approved 2 + 2 development does therefore cause limited harm to the character of the countryside. Whilst 3 additional pitches is potentially a significant increase on the current development, the impact would only be localised with no significant medium to long range impact.</p>	

Policy Number GT1(5); GT1(6); GT1(7)	Site Name: GT1(5) – Cherry Tree Farm, Stockbury; GT1(6) – Flips Hole, Stockbury; GT1(7) – The Ash, Stockbury		
Summary of issues	Officer Response	Proposed change	
<p>Object to additional allocations in Stockbury. 50% of the allocations are in Stockbury. The village has a substantial number of sites in proportion with the rest of the county. Access is along narrow lanes and existing problems will be exacerbated (residents association; resident; parish council)</p>	<p>Unauthorised sites and sites with temporary consent were assessed for their suitability for allocation as part of the preparation of the Regulation 18 Local Plan. These sites are considered suitable in terms of their limited landscape impact and in the absence of a choice of alternative available and suitable sites elsewhere, and taking account of the scale of the need for additional pitches, it is considered that they should go forward into the Regulation 19 version of the Local Plan.</p> <p>KCC Highways did not raise any objections to these site allocations.</p>	No change	
<p>Object. These are unauthorised sites in the AONB. Acceptability of the sites should be based on the presumption that they are new sites and the land restored to its former condition. The allocations would not preserve or enhance the AONB. The individual site policies do not mention that the site is within the AONB. The landscaping proposed will not mitigate the impact of the 3 allocations. (Kent</p>	<p>These are existing sites which have been assessed for their impact on the AONB and other relevant planning considerations including the identified need for additional pitches. The new policy layout for sites in the Reg 19 version of the Local Plan will include text</p>	Amend site allocation plan for GT1(7) The Ash to allocate the southern part of the site only.	

Policy Number GT1(5); GT1(6); GT1(7)	Site Name: GT1(5) – Cherry Tree Farm, Stockbury; GT1(6) – Flips Hole, Stockbury; GT1(7) – The Ash, Stockbury		
Summary of issues	Officer Response	Proposed change	
Downs AONB unit)	<p>introducing each site allocation policy which will confirm these sites location within the AONB.</p> <p>GT1(5): Visual impact is relatively low due to presence of established hedges that would remain and be strengthened under the terms of the policy. Here is a large G&T site adjacent so no significant change in terms of cumulative impact.</p> <p>GT1(6) - The site benefits from good established roadside screening and is between existing development. The landscape impact on the AONB is therefore relatively low. Refusals date for 30+ years ago.</p> <p>GT1(7) – Developed part of site is roughly rectangular on the east side of Yelsted Road around 1.3km west of Stockbury village. SHLAA site includes a further 1ha of undeveloped land to the north. The site sits in a valley with the land rising to</p>		

Policy Number GT1(5); GT1(6); GT1(7)	Site Name: GT1(5) – Cherry Tree Farm, Stockbury; GT1(6) – Flips Hole, Stockbury; GT1(7) – The Ash, Stockbury		
Summary of issues		Officer Response	Proposed change
		<p>the west and east and the site slopes upwards to the east. The site has good landscape screening along the south boundary and with the road. Access is near the south boundary.</p> <p>The developed site benefits from good established roadside screening and screening along the south boundary such that it is not intrusive. The landscape impact is therefore relatively low. Use of the undeveloped site would have a significant impact as it is more exposed and would not be acceptable.</p> <p>The site allocation plan in the Regulation 18 version of the Local Plan includes the undeveloped northern part of the site in error. This should be amended to exclude this northern part. The site capacity (5 pitches) is unchanged.</p>	
Challenge the methodology of the Sustainability Appraisal where site in the AONB cannot score 'red'. (Kent Downs AONB unit)		The AONB categorisation in the SA is either amber or green, reflecting the	No change

Policy Number GT1(5); GT1(6); GT1(7)	Site Name: GT1(5) – Cherry Tree Farm, Stockbury; GT1(6) – Flips Hole, Stockbury; GT1(7) – The Ash, Stockbury		
Summary of issues	Officer Response	Proposed change	
	<p>potential for negative effects in the AONB (or not). An amber categorisation equates to the prediction of a 'potentially significant constraint', and a green categorisation equates to the prediction of 'no constraint'. Due to the high number of sites assessed, the scores were established objectively by measuring the proximity to the AONB. This does not really allow for the significance of constraints to be determined accurately for landscape character, and so a red categorisation (significant constraint) was not included as a score for the AONB criteria.</p> <p>However, the AONB criteria was determined in the knowledge that 'landscape character' would be assessed in more detail through a separate criteria. The 'Landscape Character' criteria is scored either 'red', 'amber', or 'green', which has been informed by landscape character assessments and / or</p>		

Policy Number GT1(5); GT1(6); GT1(7)	Site Name: GT1(5) – Cherry Tree Farm, Stockbury; GT1(6) – Flips Hole, Stockbury; GT1(7) – The Ash, Stockbury		
Summary of issues		Officer Response	Proposed change
		professional opinion. These assessments take account of the setting and importance of the AONB, and identify those sites that fall within the AONB that could be more likely to lead to a significant effect (red score). Therefore it is considered that the SA Framework appropriately addresses the importance of the AONB and allows for its high level of protection to be recognised.	
Landscape schemes for the sites within the AONB should adhere to the Kent Downs AONB Management Plan. (KCC)		Policy SP5 – Countryside specifies that account will be taken of the Kent Downs AONB Management Plan.	

Policy Number GT1	Omissions from Policy GT1		
Summary of issues		Officer Response	Proposed change
Three specific sites with temporary permission should be reviewed: (agent) <ul style="list-style-type: none"> Land r/o Catchment Cottages, Yalding 		Land r/o Catchment Cottages. This is assumed to be the site now called Ash Tree Place. This existing site was assessed	

Policy Number GT1	Omissions from Policy GT1		
Summary of issues	Officer Response	Proposed change	
<ul style="list-style-type: none"> • Plots off Symonds Lane, Yalding which did not flood in 2013/14 • The Stables/Greenacres, Wagon Lane, Paddock Wood 	<p>for its suitability for allocation in the Regulation 18 version of the Local Plan and was assessed as unsuitable as it is in the Green Belt and the openness of the countryside would be compromised. There are also significant flooding issues.</p> <p>Symonds Lane: Pear Paddock and Pear View were granted personal temporary consent at appeal (09/0732 & 09/0731). Subsequent applications (13/0103 & 13/0104) were submitted seeking permanent consents for 2 mobiles & 2 tourers on each site. The assessment of these applications concluded that the development would be harmful to the character and appearance of the countryside and that mitigation has not been achieved and is unlikely to be so. On this recent analysis, these sites are considered unsuitable for allocation in the Local Plan.</p> <p>The Stables: This existing site was assessed for its suitability for allocation in</p>		

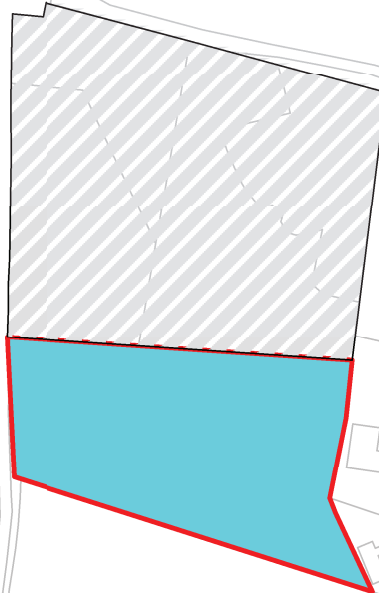
Policy Number GT1	Omissions from Policy GT1		
Summary of issues	Officer Response	Proposed change	
	<p>the Regulation 18 version of the Local Plan and was assessed as unsuitable due to significant adverse impacts on the character of the countryside and significant flooding issues.</p> <p>Greenacres: This existing site was assessed for its suitability for allocation in the Regulation 18 version of the Local Plan and was assessed as unsuitable due to landscape impact and risk to life from flooding. Application 12/1855 was dismissed at appeal in 2014.</p>		

Appendix B – schedule of detailed changes to Policies GT1

Site reference	Site name & address	Change	Reason
GT1(2)	Little Boarden, Boarden Lane, Headcorn	Amend criterion 2(i) to read: The retention and future maintenance of the existing landscaping along the <i>north west boundary</i> , <u>frontage to Boarden Lane</u> as an effective screen to the development.	For clarity.
GT1(3)	The Chances, Lughorse Lane, Hunton	Additional Criterion under design and layout section' of Policy GT1(3) to state “ <u>the siting of development should ensure a 15m buffer between development and Nine Acre Shaw (ancient woodland) to the south west.</u> ”	To provide appropriate protection to this area of Ancient Woodland.
GT1(7)	The Ash, Stockbury	Amend site allocation plan for GT1(7) The Ash to allocate the southern part of the site only as set out in the attached plan.	To rectify a drafting error in the Regulation 18 version of the Local Plan.

GT 1 (7) - THE ASH, YELSTED ROAD, STOCKBURY

Area to be excluded



APPENDIX C – Gypsy site allocation policies

GT1(8) – Kilnwood Farm, Old Ham Lane, Lenham

Ward: Harrietsham & Lenham

Parish: Lenham

Current Use: existing Gypsy site with permanent, non-personal consent for 2 mobiles and 2 tourers

This existing Gypsy site lies to the east side of Old Ham Lane, to the north of HS1. The land rises up from Old Ham Lane. The site is a cleared area which falls within Kiln Wood Local Wildlife Site managed by Kent Wildlife Trust. Kilnwood itself, north of the site, is also designated as Ancient Woodland. To the south of the site, between it and HS1, is Woodside Farm. To the west of the site is a stream and beyond this pasture land. Within the site is an existing mobile home, located centrally in the site on an open grassed area, and pens previously used for the breeding of fowl and other animals. A further mobile home is sited at the eastern edge of the site, immediately abutting the woodland.

Kilnwood Farm Development Criteria

Planning permission will be granted if the following criteria are met.

Design & layout

1. The total capacity of the site does not exceed 4 Gypsy and Traveller pitches
2. Access to the site is via the exiting access off Old Ham Lane.
3. A landscaping scheme for the site is approved which provides for the retention and future maintenance of the trees and woodland along the northern, western and eastern boundaries of the site to secure the effective screening of the site
4. The siting of the additional mobile homes maintains a 15m buffer to the Ancient Woodland.
5. A ecological assesment of the site is undertaken and an ecological enhancement and wildlife management plan for the site is approved.

Net pitch gain: 2 permanent pitches

GT1(9) – The Kays, Heath Road, Boughton Monchelsea

Ward: Coxheath & Hunton

Parish: Linton

Current Use: existing Gypsy site with permanent, non-personal permission for 1 mobile and 1 tourer.

This existing Gypsy site lies on the southern side of Heath Road. The site is set back from the road behind close boarded wooden double gates and a hedge. The existing mobile home is sited in a north-south orientation approximately half way into the depth of the site. The site is surrounded by woodland to the south and west. To the east are residential properties which front onto, and are set back from, Heath Road. Facing the site on the northern side of Heath Road is the car park for Cornwallis Academy.

The Kays Development Criteria

Planning permission will be granted if the following criteria are met.

1. The total capacity of the site does not exceed 2 pitches
2. Access to the site is via the exiting access off Heath Road.
3. The additional pitch is located towards the rear of the site and not forward of the existing mobile home.

Net pitch gain: 1 permanent pitch

GT1(10) – Greenacres (Plot 5), Church Hill, Boughton Monchelsea

Ward: Boughton Monchelsea & Chart Sutton

Parish: Boughton Monchelsea

Current Use: existing Gypsy site with permanent, non-personal permission for 1 mobile and 1 tourer.

This is an existing Gypsy site. The site lies to the west of Church Hill, the southernmost of four separate Gypsy sites on this side of Church Hill. To the north are the premises Barn View. To the south are agricultural fields and further beyond, the property The Vicarage and Cherry Tree Park holiday home site. To the rear (west) of the site is a paddock and beyond that woodland. Facing the site on the eastern side of Church Hill is extensive woodland.

The site lies behind wooden close boarded gates. There is a mature tree/hedge belt along the frontage of Church Hill which helps to screen views of the site from the road. The eaves and roof of the exiting mobile home which faces Church Hill can be seen above the level of the gates when they are closed.

Greenacres, Church Hill Development Criteria

Planning permission will be granted if the following criteria are met.

1. The total capacity of the site does not exceed 2 Gypsy and Traveller pitches
2. Access to the site is via the exiting access off Church Hill.
3. The additional pitch is sited on the existing hardstanding and not beyond the site boundaries defined on the Proposals Map.
4. A landscaping scheme for the site is approved which provides for
 - a. the retention and future maintenance of the trees and hedgeline along the site frontage to Church Hill; and
 - b. the establishment of a landscaped boundary to the south of the site comprising native species to provide an effective screen to the development

Net pitch gain: 1 permanent pitch

GT1(11) – Chart View, Chart Hill Road, Chart Sutton

Ward: Boughton Monchelsea & Chart Sutton

Parish: Chart Sutton

Current Use: existing Gypsy site with permanent, non-personal permission for 2 mobiles and 1 tourer.

The site lies to the western side of Chart Hill Road and is accessed via wooden double gates. The frontage to Chart Hill Road is screened by a tall hedgerow such that there are not clear views into the site from the road,. To the north and east are agricultural fields and to the south the residential property Little Rabbits Cross Barn. Facing the site is the junction of Chart Hill Road and Lower Farm road a beyond this, on Lower Farm Road is the complex of Rabbits Cross Farm which includes Rabbits Cross Farmhouse (Grade II* listed).

The site itself comprises a mobile home sited quite centrally in the site orientated in an east-west direction. At right angles, and to the south, is a second mobile home which also sits quite centrally in the site. At the northern boundary is a utility building. At the south west corner of the site is a further utility block/dayroom . To the rear (east) of the mobile homes, and immediately to the north and south are grassed amenity areas. Beyond the site boundaries, defined by hedges, to the north and east are agricultural fields.

Chart View Development Criteria

Planning permission will be granted if the following criteria are met.

1. The total capacity of the site does not exceed 4 Gypsy and Traveller pitches
2. Access to the site is via the exiting access off Chart Hill Road
3. The additional pitches are sited within the site boundaries as defined on the Proposals Map.
4. A landscaping scheme for the site is approved which provides for the retention and future maintenance of the trees and hedgeline along the site frontage to Chart Hill Road and of the native hedgerow along the eastern boundary of the site.

Net pitch gain: 2 permanent pitches

GT1(12) – Neverend Lodge, Pye Corner, Ulcombe

Ward: Headcorn

Parish: Ulcombe

Current Use: existing Gypsy & Traveller site with permanent, non-personal permission for 1 mobile.

This existing Gypsy site is located to the south-west of Pye Corner and south of the village of Ulcombe.

The site lies to the east of a single width rural lane that runs between the Headcorn Road and the C85 Eastwood Road. Access to the site is via a cinder drive which bends to the south towards the existing site comprising a mobile home and dayroom which is located in the SW corner of an agricultural field. Forward of the mobile home (when present) and the dayroom is an area laid out as gardens and the site is enclosed to the east and north by post and rail fencing. There is a pond area in the north western corner of the site.

The boundary between the site and the lane is marked by a hedgerow and trees.

The nearest residential property is Neverend Farm which is on adjoining land to the north-east.

Neverend Lodge Development Criteria

Planning permission will be granted if the following criteria are met.

1. The total capacity of the site does not exceed 2 Gypsy and Traveller pitches
2. Access to the site is via the exiting access.
3. The additional pitch is sited in the south eastern corner of the site adjacent to the existing permitted mobile and not beyond the site boundaries as defined on the Proposals Map.
4. A landscaping scheme for the site is approved which provides for
 - a. the retention and future maintenance of the trees and hedgeline along the site's western frontage ; and
 - b. the establishment of a native species landscaped boundary along the eastern edge of the site to create a more permanent boundary

Net pitch gain: 1 permanent pitch

GT1(13) – The Paddocks, George Street, Staplehurst

Ward: Staplehurst

Parish: Staplehurst

Current Use: existing Gypsy site with permanent, non-personal permission for 2 mobiles and 2 tourers

The site is accessed from George Street, a rural lane to the north of Staplehurst. The site lies on the northern side of George Street. The site is situated in the south western corner of a field used as pasture. The site is set back from the road, accessed via a tarmacked driveway. The existing mobile homes are sited to the east of the driveway, largely screened from the road by a hedgerow. Facing the site on the south side of George Street are playing fields (cricket/football). To the west is the Gypsy site Bluebell Farm.

The Paddocks Development Criteria

Planning permission will be granted if the following criteria are met.

1. The total capacity of the site does not exceed 4 Gypsy and Traveller pitches
2. Access to the site is via the exiting access off George Street.
3. The additional pitches are sited within the site boundaries as defined on the Proposals Map.
4. A landscaping scheme for the site is approved which provides for
 - a. the retention and future maintenance of the trees and hedgeline along the site's frontage to George Street
 - b. the establishment of a native species landscaped boundary along the rear (northern) edge of the site to create a more permanent boundary
5. An ecological assessment of the site is undertaken and the proposals incorporate necessary habitat creation, enhancement and mitigation measures.

Net pitch gain: 2 pitches

GT1(14) – Bluebell Farm, George Street, Staplehurst

Ward: Staplehurst

Parish: Staplehurst

Current Use: existing Gypsy site with permanent, non-personal permission for 2 mobiles and 2 tourers

The site is accessed from George Street ,a rural lane to the north of Staplehurst. The site lies on the northern side of George Street. It is set back from the lane, accessed via a tarmac drive and a substantial tree/hedgerow belt runs along the southern boundary of the site, fronting George Street. The site is situated in the south western corner of a field used as pasture. The site is occupied by 2 mobile homes and hardstanding. Facing the site on the south side of George Street are playing fields (cricket/football). To the east is the Gypsy site The Paddocks.

Bluebell Farm Development Criteria

Planning permission will be granted if the following criteria are met.

1. The total capacity of the site does not exceed 4 Gypsy and Traveller pitches
2. Access to the site is via the exiting access off George Street.
3. The additional pitches are sited within the site boundaries as defined on the Proposals Map.
4. A landscaping scheme for the site is approved which provides for
 - a. the retention and future maintenance of the trees and hedgeline along the site's frontage to George Street
 - b. the establishment of a native species landscaped boundary along the rear (northern) edge of the site to create a more permanent boundary
5. An ecological assessment of the site is undertaken and the proposals incorporate necessary habitat creation, enhancement and mitigation measures.

Net pitch gain: 2 pitches

GT1(15) – land rear of Granada, Lenham Road, Headcorn

Ward: Headcorn

Parish: Headcorn

Current Use: existing Gypsy site with permanent, non-personal permission for 1 mobile

This is an existing Gypsy site located on the southern side of Lenham Road, Headcorn. The site lies immediately to the rear (south) of Granada which is itself a Gypsy site with permanent permission for two mobiles. To the immediate west of Granada, also fronting Lenham Road is Lorne Greenacres which is a Gypsy site with permanent permission for three mobiles.

The site itself is mainly hardsurfaced and is separated from Granada to the north with a coniferous hedge. Access into the site is via a driveway shared with Granada. The eastern and southern boundaries of the site comprise native tree/hedge belts. To the immediate west of the site is an area of pasture which is itself enclosed by a hedge. There is extant permanent permission for a mobile home to be sited in the north western corner of the site.

Land rear of Granada Development Criteria

Planning permission will be granted if the following criteria are met.

1. The total capacity of the site does not exceed 2 Gypsy and Traveller pitches
2. Access to the site is via the existing access off Lenham Road.
3. The additional pitch is sited on the existing area of hardstanding in the eastern part of the site and not beyond the site boundaries as defined on the Proposals Map.
4. A landscaping scheme for the site is approved which provides for
 - a. the retention and future maintenance of the trees and hedgeline along the site's southern, eastern and northern boundaries
 - b. the establishment of a native species landscaped boundary along the western edge of the site to create a more permanent boundary

Net pitch gain: 1 permanent pitch

GT1(16) – Land at Blossom Lodge, Stockett Lane, Coxheath

Ward: Coxheath & Hunton

Parish: Coxheath

Current Use: existing Gypsy site

The site is located on the south eastern side of Stockett Lane. The site is an existing Gypsy site with four mobile homes currently on site, two of which are currently unauthorised subject to the outcome of a current planning application (12/1209). The site is fairly level and is rectangular in shape, extending eastwards from the site's frontage to Stockett Lane. Access to the site is via a driveway which runs along the site's southern boundary. A public footpath diagonally crosses the western end of the site .

To the north of the site is the existing Gypsy site Silverleas (permanent permission for 3 caravans) and to the east of that a cherry orchard. Adjacent to the south is the site Primrose Paddock (permanent permission for 2 mobiles) and beyond it to the east, a further orchard area. Due east of the site itself is an agricultural field. .

There are established hedgerow boundaries around the extent of the existing site.

Blossom Lodge Development Criteria

Planning permission will be granted if the following criteria are met.

1. The total capacity of the site does not exceed 6 Gypsy and Traveller pitches
2. Access to the site is via the exiting access off Stockett Lane.
3. The additional pitch is sited within the site boundaries as defined on the Proposals Map.
4. A landscaping scheme for the site is approved which provides for the retention and future maintenance of the hedgerows and tree planting along the site's northern, southern western and eastern boundaries and the native hedgerow bordering the public footpath which crosses the site

Net pitch gain: 6 permanent pitches

GT 1 (8) - KILNWOOD FARM, OLD HAM LANE



GT 1 (9) - THE KAYS, HEATH ROAD

HEATH ROAD



GT 1 (10) - GREENACRE (PLOT 5), CHURCH HILL,
BOUGHTON MONCHELSEA



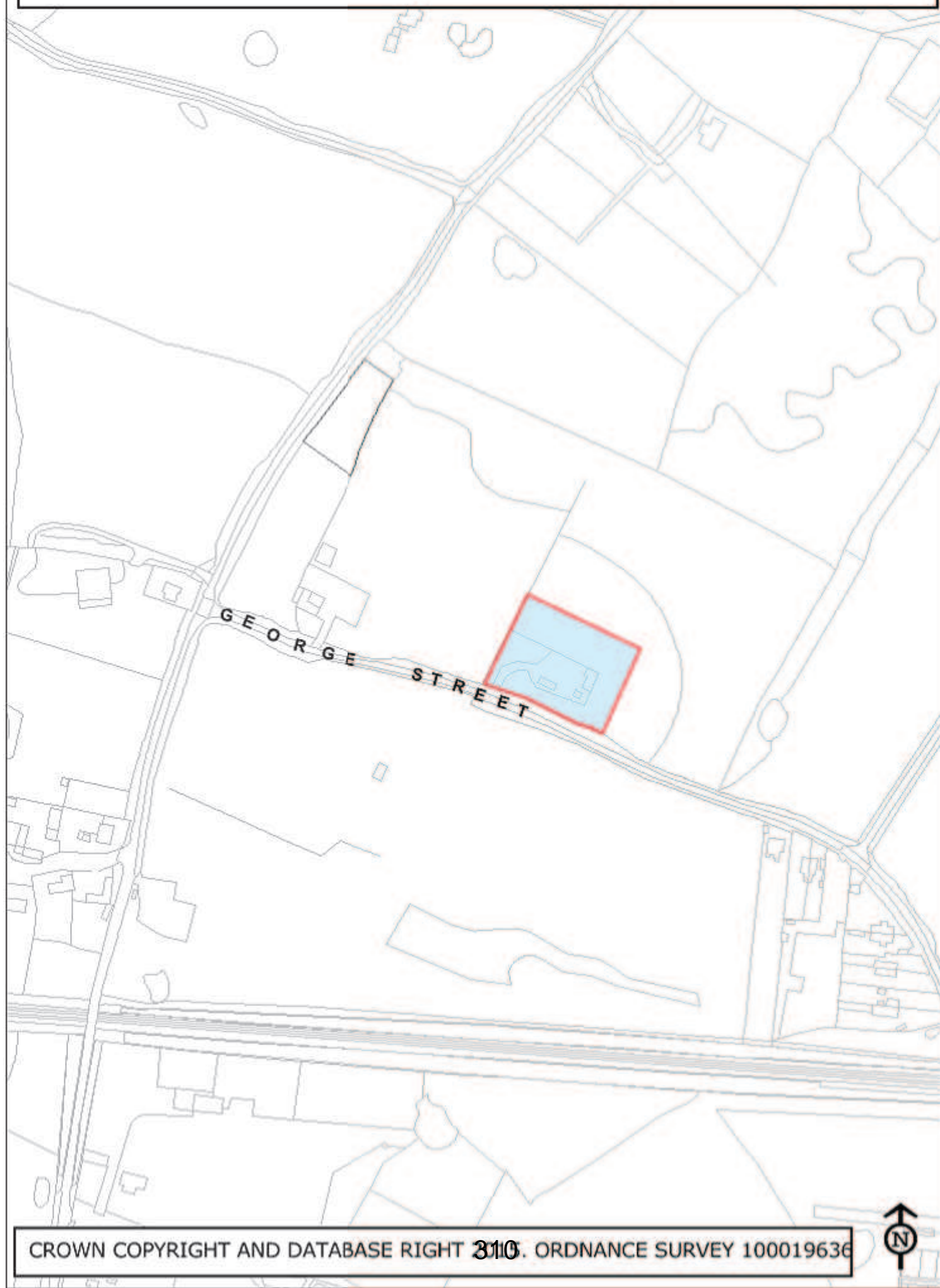
GT 1 (11) - CHART VIEW, CHART HILL ROAD



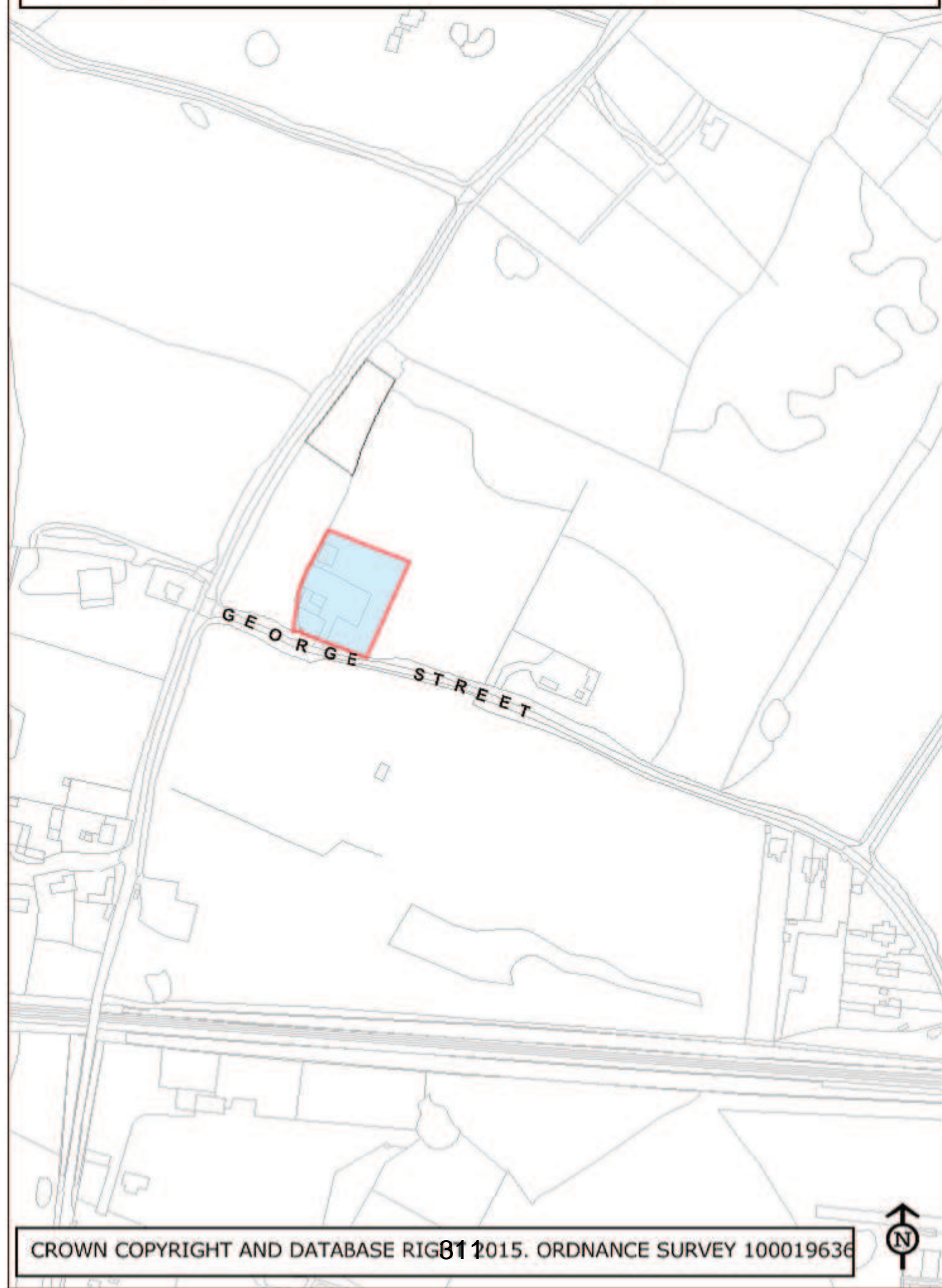
GT 1 (12) - NEVEREND FARM, PYE CORNER, ULCOMBE



GT 1 (13) - THE PADDOCKS, GEORGE STREET, STAPLEHURST



GT 1 (14) - BLUEBELL FARM, GEORGE STREET, STAPLEHURST

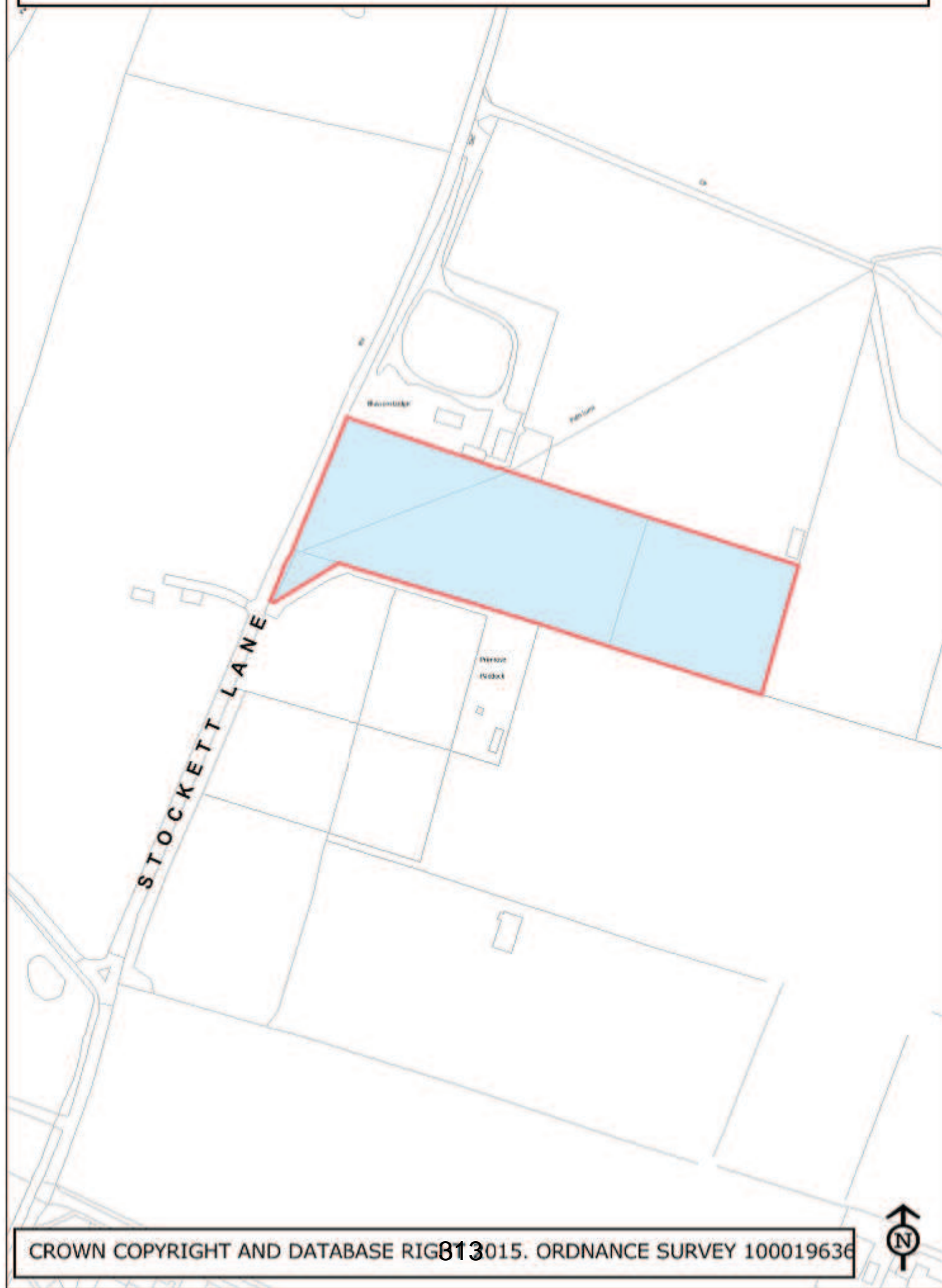


GT 1 (15) - GRANADA, LENHAM ROAD, HEADCORN

LENHAM ROAD



GT 1 (16) - BLOSSOM LODGE, STOCKETT LANE, COXHEATH



Maidstone Local Plan Sustainability Appraisal

Interim Sustainability findings: Gypsy and Traveller Site Options Appraisal

August 2015

1 Site Appraisal Methodology

1.1 Introduction

This report presents a summary of the Sustainability Appraisal findings for a range of Gypsy and Traveller Site Options.

SA is a process for determining the potential effects of the Local Plan (including sites) and identifying potential mitigation and enhancement measures. This ought to help inform the decisions about how the Plan should develop; including the selection of sites for allocation.

AECOM has been commissioned by the Council to undertake the SA of the Local Plan. The latest stage of appraisal has involved assessment of a range of site options that the Council considers to be reasonable to consider for potential inclusion in the Local Plan (as allocations for Gypsy and Traveller Sites).

1.2 Methodology

The sites appraised have been identified by the Council from a range of sources as follows:

- Sites previously considered as candidates for the potential public Gypsy and Traveller site;
- Sites submitted as potential Gypsy and Traveller Locations (Call for Sites 2014);
- Rejected housing, employment and mixed use sites from 2013 and 2014 SHLAA and SEDLAA; and
- Existing permanent Gypsy and Traveller Sites with possible potential to expand or intensify.

The appraisal findings are set out in separate tables, one for each of these different sources.

It should be noted that some sites were discounted at a first stage by the Council prior to being put forward for appraisal in the SA. These sites were ones not considered to be reasonable site options by the Council; with the main reason being the confirmed unavailability of the land, and/or the presence of a major or multiple planning constraints for example Flood Zone 2/3.

All site options included in the SA have been assessed using a strict 'appraisal question' based methodology. This means that there is consistency in how the scores have been established across every site.

The site appraisal questions were developed to reflect the sustainability issues identified through SA Scoping. Scoping is the process of identifying what the main issues should be that the SA focuses on. **Table 1** sets out how the SA framework established through scoping was used as a starting point for identifying suitable site appraisal criteria. However, given data availability the questions that it has been possible to pose are limited in scope; as discussed in **Table 1**.

The site appraisal process is consistent with all site assessments that have been undertaken at previous stages of SA (i.e. appraisal of housing and employment site options).

Table 1: Scope of the site appraisal methodology

Sustainability topic	Appraisal criteria used	Comments / limitations
Housing	N/A	It is not appropriate to simply examine the size of sites as a proxy for the number of homes/affordable homes that could be delivered (taking into account the assumption that larger developments can deliver a higher proportion of affordable housing). This is on the basis that sites will often eventually be brought forward in combination.
Flooding	Is allocation of the site within a flood zone? Is the proposed use of the site appropriate in terms of guidance set out in the 'Technical Guidance to the NPPF' relating to flood risk? See table 3 (page 8) of the technical guidance.	Criteria do not establish the extent to which a site lays within flood zones or whether this portion could be avoided.
Health	Are there potential noise problems with the site – either for future occupiers or for adjacent/nearby occupiers arising from allocation of the site? How far is the site from the nearest children's play space? How far is site from the nearest area of publicly accessible greenspace (>2ha in size)?	Criteria do not account for the quality of parks and play spaces. Nor do they account for the usage of facilities and potential over-capacity.
Poverty	Will allocation of the site result in employment-generating development in or close to (<2400m) deprived areas?	It is assumed that development can bring with it investment that will in turn help to facilitate an increase in prosperity locally / reduce spatial inequalities in terms of relative deprivation.
Education	How far is the site from the nearest secondary school? How far is the site from the nearest primary school?	It may have been possible to assess the potential for new development to impact on school capacity. However, in practice, developments will be required to provide enhanced school place provision to account for population growth in an area.
Crime	N/A	It is difficult to make a meaningful assessment of impacts on levels of crime at this scale.
Vibrant Community	N/A	It is not possible to determine how sites could affect involvement in community activities.
Accessibility	How far is the site from the Maidstone Urban Area or a Rural Service Centre? How far is the site from the nearest medical hub or GP service? How far is the site from the nearest post office? How far is the site from the nearest outdoor sports facilities (i.e. playing pitch, tennis courts)? How far is the site from the nearest children's play space? How far is site from the nearest area of publicly accessible greenspace (>2ha in size)?	A major limitation relates to the fact that larger sites could have differing levels of accessibility. It is also important to note that all distances are „as the crow flies" as it was not possible to take account of routes / pathways (e.g. the distance of the route that would be taken in practice when walking or travelling by car to reach a local centre). Criteria do not account for the quality of parks and leisure facilities. Nor do they account for the usage of facilities and potential over-capacity.
Culture	N/A	It is not possible to determine how sites could affect cultural activities.
Land Use	Will allocation of the site lead to loss of the best and most versatile agricultural land? Will allocation of the site make use of previously developed land?	Agricultural land classification uses historical data. The criteria does not differentiate between Grade 1, 2 and 3a/3b agricultural land. However, a description of each 'score' is provided in the individual site proformas to explain the site characteristics in further detail.

Sustainability topic	Appraisal criteria used	Comments / limitations
Congestion	How far is the site from the nearest bus stop? How far is the site from the nearest train station? Is the site within or near to an AQMA?	Different parts of a larger site may not be as accessible as others. Measuring 'as the crow flies' is not wholly representative of actual routes and distances.
Climate Change	N/A	The ability of development to adopt building integrated low carbon technologies is not affected by location. Suitability for district energy schemes has not been established for each site
Biodiversity	Is the allocation of the site likely to impact upon an Ancient Woodland (AW) or Ancient Semi-Natural Woodland (ASNW)? Is the allocation of the site likely to impact upon a Site of Special Scientific Interest (SSSI)? Is the allocation of the site likely to impact upon a Local Wildlife Site (LWS) or Local Nature Reserve (LNR)?	Distance to wildlife sites is not the only indicator of a potential impact. For example, scale of development is not accounted for. A smaller allocation could be closer to a site and have fewer impacts than a much larger scale location that is further away. Distance is measures from site boundaries.
Countryside and Heritage	Is the allocation of the site likely to impact upon a Scheduled Ancient Monument (SAM)? Listed Building? Conservation Area? Does the site lie within an area with significant archaeological features/finds or where potential exists for archaeological features to be discovered in the future? Is the site located within or in proximity to and/or likely to impact on the Kent Downs AONB? Is the site in the Green Belt? If so, is the allocation of the site likely to cause harm to the objectives of the Green Belt designation? Would development of the site lead to any potential adverse impacts on local landscape character for which mitigation measures appropriate to the scale and nature of the impacts is unlikely to be achieved? What is the Landscape Capacity to Accommodate Change?	Ideally, it would be desirable to establish the extent and sensitivity of different character areas and to make an assessment of how each site option could impact upon local character. This information is available for some sites (as taken from detailed Landscape Character Assessments 2014). However, for some sites, this information has been inferred using broader level landscape characterisations and officer views. Where a detailed site assessment has been undertaken as part of the 2014 landscape study, this replaces the assessment made at previous stages of appraisal using broad character areas in the 2012 landscape assessment. Proximity to heritage features is measured from site boundaries.
Waste	N/A	
Water Management	N/A	Ideally, the potential impact of sites on water quality would be established. However, it is difficult to quantify impacts based purely on distance.
Energy	N/A	
Economy	How accessible is the site to local employment provision (i.e. employment sites or the nearest local service centre?) Will allocation of the site result in loss of employment land/space?	NB: Employment land is often somewhat substitutable, i.e. can be possible to develop other sites for the same or similar employment use.

Tables 2 presents a concise list of the appraisal questions posed, along with the 'decision rules' used to categorise performance. A **red** categorisation equates to the prediction of a 'significant constraint', an **amber** categorisation equates to the prediction of a 'potentially significant constraint', and a **green** categorisation equates to the prediction of 'no constraint'.

The decision rules are largely quantitative. This allows for the analysis of the sites to be undertaken using Geographical Information System (GIS) software.

The 'Landscape Character' and 'Noise' criteria have been determined using suitable evidence and professional evidence. Where qualitative information / professional judgement has been drawn on when categorising sites as **red**, **green** or **amber** this is highlighted in the site proformas.

Most of the decision rules are distance related. It is important to note that all distances are 'as the crow flies' as it was not possible to take account of routes / pathways (e.g. the distance of the route that would be taken in practice when walking or travelling by car to reach a local centre). Most distance rules have been developed internally by the plan-making / SA team, following a review of thresholds applied as part of Site Allocation / SA processes elsewhere in England. A number of thresholds reflect the assumption that 400m is a distance that is easily walked by those with young children and the elderly.

Table 2: Site appraisal questions and decision rules

Criteria	Scoring
Accessibility	
How far is the site from the Maidstone Urban Area or a Rural Service Centre?	<p>R = Not adjacent to the Maidstone Urban Area, or a rural service centre and would not be more accessible to services even if other sites were allocated</p> <p>A = Adjacent to the Maidstone Urban Area or a rural service centre, or could be more accessible to services if other sites allocated as well</p> <p>G = Within the Maidstone Urban Area or a rural service centre</p>
How far is the site from the nearest medical hub or GP service?	<p>R = >800m</p> <p>A = 400m – 800m</p> <p>G = <400m</p>
How far is the site from the nearest secondary school?	<p>R = >3900m</p> <p>A = 1600-3900m</p> <p>G = <1600m;</p>
How far is the site from the nearest primary school?	<p>R = >1200m</p> <p>A = 800-1200m</p> <p>G = <800m;</p>
How far is the site from the nearest post office?	<p>R = >800m</p> <p>A = 400m – 800m</p> <p>G = <400m</p>
How far is the site from the nearest outdoor sports facilities (i.e. playing pitch, tennis courts)?	<p>A = >1.2km</p> <p>G = <1.2km</p>
How far is the site from the nearest children's play space?	<p>A = >300m from 'neighbourhood' children's play space</p> <p>G = <300m</p>
How far is site from the nearest area of publicly accessible greenspace (>2ha in size)?	<p>A = >300m (ANGST)</p> <p>G = <300m</p>
Economy	
How accessible is the site to local employment provision (i.e. employment sites or the nearest local service centre?)	<p>R= >2400m</p> <p>A = 1600-2400m</p> <p>G = <1600m</p>
Will allocation of the site result in loss of employment land/space?	<p>R = Allocation will lead to significant loss of employment land/space</p> <p>A = Allocation will lead to some loss of employment land/space</p> <p>G = Allocation will not lead to the loss of employment land/space</p>
Will allocation of the site result in employment-generating development in or close to (<2400m) deprived areas?	<p>A = Not within or close to the 40% most deprived Super Output Areas within the country, according to the Index of Multiple Deprivation, 2010.</p> <p>G = Within or close to the 40% most deprived Super Output Areas within the country.</p>

Criteria	Scoring
Transport and accessibility	
How far is the site from the nearest bus stop?	R = >800m A = 400 - 800m G = <400m
How far is the site from the nearest train station?	R = >800m A = 400 - 800m G = <400m
How far is the site from the nearest cycle route?	R = >800m A = 400 - 800m G = <400m
Landscape, townscape and the historic environment	
Is the allocation of the site likely to impact upon a Scheduled Ancient Monument (SAM)?	A = On a SAM OR Allocation will lead to development adjacent to a SAM with the potential for negative impacts G = Not on or adjacent to a SAM and is unlikely to have an adverse impact on a nearby SAM.
Is the allocation of the site likely to impact upon a listed building?	A = Contains or is adjacent to a listed building and there is the potential for negative impacts. G = Not on or adjacent to a listed building and is unlikely to have an impact on a nearby listed building.
Is the allocation of the site likely to impact upon a Conservation Area?	A = Within or adjacent to a Conservation Area and there is the potential for negative impacts. G = Not within or adjacent to a Conservation Area and is unlikely to have an impact on a nearby listed building.
Does the site lie within an area with significant archaeological features/finds or where potential exists for archaeological features to be discovered in the future?	A = Within an area where significant archaeological features are present, or it is predicted that such features could be found in the future. G = Not within an area where significant archaeological features have been found, or are likely to be found in the future. N = No information available at this stage
Is the site located within or in proximity to and/or likely to impact on the Kent Downs AONB?	A = In close proximity to the Kent Downs AONB and/or there is the potential for negative impacts. G = Not in close proximity to the Kent Downs AONB and/or negative impacts on the AONB are unlikely.
Is the site in the Green Belt? If so, is the allocation of the site likely to cause harm to the objectives of the Green Belt designation?	A = Within or adjacent to the Green Belt and development could potentially cause harm to the purposes of the Green Belt designation and/or its openness G = Not within or adjacent to the Green Belt
Would development of the site lead to any potential adverse impacts on local landscape character for which mitigation measures appropriate to the scale and nature of the impacts is unlikely to be achieved? <i>*Determined through 2012 Landscape Character Assessment</i>	R = Likely adverse impact (taking into account scale, condition and sensitivity issues), which is unlikely to be appropriately mitigated A = Likely adverse impact (taking into account scale, condition and sensitivity issues), which is likely to be appropriately mitigated G = Opportunity to enhance landscape character or there is unlikely to be an adverse impact
Landscape Sensitivity <i>*Determined through Maidstone Landscape Capacity Study (2014)</i>	R = Low capacity to accommodate change A = Moderate capacity to accommodate change G = High capacity to accommodate change

Criteria	Scoring
Air quality and causes of climate change	
Are there potential noise problems with the site – either for future occupiers or for adjacent/nearby occupiers arising from allocation of the site?	A = Potential adverse impact G = Unlikely adverse impact N = No information available at this stage
Is the site within or near to an AQMA?	R = Within or adjacent to an AQMA A = <1km of an AQMA G = >1km of an AQMA
Land use	
Will allocation of the site lead to loss of the best and most versatile agricultural land?	A = Includes Grade 1, 2 or 3 agricultural land G = Does not include 1, 2 or 3 agricultural land
Will allocation of the site make use of previously developed land?	R = Does not include previously developed land A = Partially within previously developed land G = Entirely within previously developed land
Flood Risk	
Is allocation of the site within a flood zone?	R = Flood risk zone 3b A = Flood risk zone 2 or 3a G = Flood risk zone 1
Is the proposed use of the site appropriate in terms of guidance set out in the 'Technical Guidance to the NPPF' relating to flood risk? See table 3 (page 8) of the technical guidance.	R = Development should not be permitted A = Exception test is required G = Development is appropriate
Biodiversity and Green Infrastructure	
Is the allocation of the site likely to impact upon an Ancient Woodland (AW) or Ancient Semi-Natural Woodland (ASNW)?	R = Includes AW/ASNW A = <400m from an AW/ASNW G = >400m
Could allocation of the site have a potential adverse impact on a SSSI?	A = Potential impacts identified by County Ecologist G = No likely impacts identified at this stage.
Could allocation of the site have a potential adverse impact on a designated Local Wildlife Site or Local Nature Reserve?	A = Potential impacts identified by County Ecologist G = No likely impacts identified at this stage.

2 Site Appraisal Findings

2.1 Introduction

Detailed site proformas have been produced for each site option, which present the site scores against each of the site appraisal criteria included in **Table 2**. These proformas will be included as a technical appendix to the Final SA Report.

The following tables present a summary of the SA findings, grouped by the source of site options as follows:

Table 3: *Sites previously considered as candidates for the potential public Gypsy and Traveller site*

Table 4: *Sites submitted as potential Gypsy and Traveller Locations (Call for Sites 2014)*

Table 5: *Rejected housing, employment and mixed use sites from 2013 and 2014 SHLAA/SEDLAA)*

Table 6: *Existing permanent Gypsy and Traveller Sites with possible potential for additional pitches*

Table 3: Sites previously considered as candidates for the potential public Gypsy and Traveller site

Site ID	Site Name	Location	Access to centres	Access to GP or medical hub	Access to Secondary School	Access to Primary School	Proximity to Post Office	Proximity to outdoor sports	Proximity to play space	Proximity to greenspace	Proximity to employment sites	Loss of employment land?	Proximity to bus stop	Proximity to train station	Cycle routes	Noise	Air quality	Agricultural land	Land use	Scheduled Ancient Monument	Listed Building	Conservation Area	Archaeology	Kent Downs AONB	Green Belt	Landscape character	Landscape capacity to change	Flood zone	Flood risk	Ancient woodland	SSSI	Local Wildlife sites
Possible Site 33	Land north of Haste Hill Road	Boughton Monchelsea																														
Possible Site 34	Land south of the old Barn House	Boughton Monchelsea																														
Possible Site 35	Land north of Green Lane, Laburnam Cottage	Boughton Monchelsea																														
Possible Site 36	Land north of Green Lane, south of Lyewood	Boughton Monchelsea																														
Possible Site 43	Land north of Heath Road, Parsonage Farm	Boughton Monchelsea																														
Possible Site 46	Land north of Parsonage Farm	Stockbury																														
Possible Site 47	Land north of Church Lane, n. of South St	Stockbury																														
Possible Site 48	Land south of Church Lane, jct. South Street	Barming																														
Possible Site 65	Land at Dean Street	Coxheath																														
Possible Site 66	Land at Hurst Road	Bredhurst																														
Possible Site 67	Land off Dean Street	North of Coxheath																														
Possible Site 74	Monchelsea Farm	Boughton Monchelsea																														
Possible Site 78	Manor Farm	Sutton Valance																														
Possible Site 81	Land adjacent to The Nook	Yalding																														
Possible Site 84	Land adj Gallants Lane	near Coxheath																														
Possible Site 86	Land at Gallants Lane	Coxheath																														
Possible Site 87	Land at Lower Rd, Farleigh Green	East Farleigh																														
Possible Site 97	Land at Chart Sutton, Chart Sutton	Chart Sutton																														
Possible Site 98	Land at Tyland Lane	Sandling																														
Possible Site 101	The Stumps, Lenham Road	Kingswood																														
Possible Site 107	Land south Tumblers Hill	Sutton Valance																														
Possible Site 108	Land south Ploughwents Road	Chart Sutton																														
Possible Site 110	Garages off Grasslands	Langley																														

Table 4: Sites submitted as potential Gypsy and Traveller Locations (Call for Sites 2014).

Site ID	Site Name	Location	Access to centres	Access to GP or medical hub	Access to Secondary School	Access to Primary School	Proximity to Post Office	Proximity to outdoor sports	Proximity to play space	Proximity to greenspace	Proximity to employment sites	Loss of employment land?	Proximity to bus stop	Proximity to train station	Cycle routes	Noise	Air quality	Agricultural land	Land use	Scheduled Ancient Monument	Listed Building	Conservation Area	Archaeology	Kent Downs AONB	Green Belt	Landscape character assessment	Landscape capacity to change	Flood zone	Flood risk	Ancient woodland	SSSI	Local Wildlife sites
GT3 50	Land Kingswood Farm	Ulcombe																														
GT3 51	Five Acres, Tilden Lane	Marden																														
GT3 J2	Blossom Lodge Stocket Lane	Coxheath																														
HO3 208	Land adjacent Charlesford Avenue	Kingswood																														
HO3 210	Butlers Farm, Horseshoes Lane	Langley																														
HO3 218	Eaglesham, Marley Road	Harrietsham																														
GT1	Congelow Farm	Yalding																														

Table 5: Rejected housing , employment and mixed use sites from 2013 and 2014 SHLAA/SEDLAA

Site ID	Site Name	Location	Access to centres	Access to GP or medical hub	Access to Secondary School	Access to Primary School	Proximity to Post Office	Proximity to outdoor sports	Proximity to play space	Proximity to greenspace	Proximity to employment sites	Loss of employment land?	Proximity to bus stop	Proximity to train station	Cycle routes	Noise	Air quality	Agricultural land	Land use	Scheduled Ancient Monument	Listed Building	Conservation Area	Archaeology	Kent Downs AONB	Green Belt	Landscape character assessment	Landscape capacity to change	Flood zone	Flood risk	Ancient woodland	SSSI	Local Wildlife sites
HO3-198	Land adjoining `Yelton` at Heath Road, Coxheath	Coxheath	Red	Yellow	Yellow	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Red	Red	Green	Green	Yellow	Red	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Yellow	Green	Green
HO3-281	Land at rear of Peg Tile Cottage	Marden & Yalding	Red	Red	Red	Yellow	Red	Green	Yellow	Yellow	Green	Green	Yellow	Red	Red	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green
HO3-274	Duckhurst Farmyard, Clapper Lane, Staplehurst	Staplehurst	Red	Red	Red	Red	Red	Green	Yellow	Green	Green	Green	Yellow	Yellow	Red	Yellow	Green	Yellow	Yellow	Green	Yellow	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Yellow
HO3-291	Rear of Barker Cottages, New Cut, East Farleigh	Coxheath	Red	Red	Yellow	Yellow	Red	Yellow	Yellow	Green	Green	Green	Green	Red	Red	Green	Green	Yellow	Yellow	Green	Yellow	Yellow	Green	Green	Green	Yellow	Yellow	Green	Green	Yellow	Green	Green
EDN 4	Sandway Quarry		Red	Red	Red	Green	Red	Green	Yellow	Green	Green	Green	Yellow	Yellow	Red	Green	Green	Yellow	Yellow	Green	Yellow	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Yellow
EDN 16	Rough Shave Wood		Red	Red	Red	Green	Red	Green	Yellow	Green	Green	Green	Yellow	Yellow	Red	Green	Green	Yellow	Yellow	Green	Yellow	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Yellow

Table 6: Existing permanent Gypsy and Traveller Sites with possible potential to expand or intensify

Site ID	Site Name	Location	Access to centres	Access to GP or medical hub	Access to Secondary School	Access to Primary School	Proximity to Post Office	Proximity to outdoor sports	Proximity to play space	Proximity to greenspace	Proximity to employment sites	Loss of employment land?	Proximity to bus stop	Proximity to train station	Cycle routes	Noise	Air quality	Agricultural land	Land use	Scheduled Ancient Monument	Listed Building	Conservation Area	Archaeology	Kent Downs AONB	Green Belt	Landscape character assessment	Landscape capacity to change	Flood zone	Flood risk	Ancient woodland	SSSI	Local Wildlife sites
4	Fairview, Osborne Drive	Detling Hill																														
5	Little Acre, Chart Hill Road	Chart Sutton																														
7	Peacock Farm, Chart Hill Road	Chart Sutton																														
8	Chart View, Chart Hill Road	Chart Sutton																														
9	Chart Hill Paddock, Chart Hill Road	Chart Sutton																														
42	Mulberry Farm, East Street	Hunton																														
326	The Kays, Heath Road	Linton																														
	Plum Tree Farm, Park Road	Marden																														
	Blue Bell Farm, George Street	Staplehurst																														
	The Paddocks, George Street	Staplehurst																														
	Kilnwood Farm, Old Ham Lane	Lenham																														
	Near Neverend Farm, Pye Corner	Ulcombe																														
	Roydon Farm, Pye Corner	Ulcombe																														
	Emmett Hill Nursery, Emmett Hill Lane	Yalding																														
	Cobnut Tree Place (plot 1), Church Hill	Boughton																														
	Greenacre (plot 5), Church Hill	Boughton Monchelsea																														
170	Four Oakes (plot 2), Church Hill	Boughton Monchelsea																														
173	Granada, Lenham Road	Headcorn																														
186	Orchard Farm Nursery Plot 1	Chartway Street																														

Agenda Item 13

Strategic Planning, Sustainability & Transport Committee

14th July 2015

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

Yes

Maidstone Borough Local Plan – mixed use allocations – deferred from 23 July 2015

Final Decision-Maker	Strategic Planning, Sustainability and Transport Committee
Lead Director or Head of Service	Rob Jarman, Head of Planning & Development
Lead Officer and Report Author	Sarah Anderton, Principal Planning Officer (Spatial Policy)
Classification	Non-exempt
Wards affected	All

This report makes the following recommendations to the final decision-maker:

1. That the Committee approves the officer responses to the representations submitted during public consultation on the draft Maidstone Borough Local Plan 2014 for policy RMX1 Retail and Mixed Use Allocations, set out in Appendix I.
2. That the Committee approves the amendments to Policy RMX1 set out in Appendix II, for incorporation into the Regulation 19 version of the Maidstone Borough Local Plan

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
Policy and Resources Committee	n/a
Council	n/a
Other Committee	n/a

Maidstone Borough Local Plan – mixed use allocations

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 This report responds to, and proposes changes to, the allocation policies for mixed use sites (Policy RMX1) contained in the draft Maidstone Borough Local Plan (Regulation 18) (“the Reg 18 Plan”) as a result of the representations made to these policies during the public consultation held between March and May 2014. It recommends that the proposed changes be approved for incorporation into the next full draft of the Local Plan (Regulation 19).

2. INTRODUCTION AND BACKGROUND

- 2.1 The draft Maidstone Borough Local Plan was approved by Cabinet for its first full stage of public consultation (Regulation 18) in February 2014. The public consultation took place between 21 March and 7 May 2014.
- 2.2 Cabinet considered the representations to the development management policies (14th January 2015) and agreed amendments for inclusion in the next full draft of the Local Plan (Regulation 19). The housing site allocations in Policy H1 of the Reg 18 Plan were considered by Cabinet (2nd and 4th February and 9th March 2015) and some of these are also the subject of a separate report on this agenda.
- 2.3 This report considers the representations made to the mixed use site allocations made under Policy RMX1 of the Reg 18 Plan and proposes changes to be included in the Regulation 19 version of the Plan which is scheduled for public consultation in early 2016.

3. AVAILABLE OPTIONS

- 3.1 Policy RMX1 allocates five sites for mixed use development. Representations were made to the policy during the Regulation 18 consultation undertaken between March and May 2014. The Committee could decide not to consider these representations at this time and to defer consideration to a later meeting. Such delay could, however, impact on the draft programme for the progression of the Local Plan towards Independent Examination agreed by the Committee at its June meeting.
- 3.2 The Committee could decide not to consider the representations at all, and to progress Policy RMX1 unaltered for inclusion in the Regulation 19 version of the Plan. This is not advised as proper consideration of the issues raised during consultation, and of any updated information received since the Reg 18 Plan was prepared, will be of benefit to the overall soundness of the Plan.

- 3.3 The Committee could decide to consider the representations in line with the recommendation. For the reasons above, this is the preferred option.
-

4. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS

- 4.1 For the reasons set out above, the preferred option is for the Committee to consider the representations and updated information as presented in the remainder of this report.
- 4.2 The issues raised in representations to Policy RMX1 are set out in the table in Appendix I. The table also includes an officer response to each of the issues raised and recommends appropriate changes to the policy. The specific changes which are being recommended are also set out separately in Appendix II. Key points raised by the representations are discussed below.

Newnham Court, Maidstone (Policy RMX1(1))

- 4.3 Concerns have been raised about the visual and landscape impact of the proposals for Newnham Court, stating that this would equate to over development of the site, that the foreground of the Kent Downs AONB should be protected, and objecting to the loss of countryside.
- 4.4 In response, Policy RMX1(1) specifically seeks to control and limit the amount of additional development across the site. The policy also clearly requires extensive structural and internal landscaping and landscape buffers to help mitigate the visual impact of development. The redevelopment of Newnham Court shopping village is limited to only a marginal increase on the existing development footprint.
- 4.5 Regarding the loss of the countryside, some greenfield loss will be required to accommodate growth needs over the timescale of the Local Plan. Junction 7 is a location where there is already significant, existing development and where the principle of further development is already established through planning consents. Policy RMX1(1) seeks to mitigate impacts on the setting of the AONB through, for example, explicit landscaping requirements and the control of building heights and siting and lighting. The policy also specifically requires a landscape buffer to Horish Wood Local Nature Reserve.
- 4.6 In summary, it is considered that the policy as drafted provides adequate safeguards against the impacts cited in these representations. A detailed change to the policy is recommended in order to clarify that compensatory planting will be required where loss of existing planting is unavoidable.
- 4.7 Concerns were also raised about highway impacts (congestion) and, conversely, that the list of transport requirements in the policy may not be appropriate for the scale of retail development proposed in the policy.
- 4.8 The transport measures specified in the policy have been agreed with KCC Highways as the highway authority. Further, the highways measures associated with the medical campus have been confirmed through the determination of the

outline application (MA/13/1163). For clarity, the policy specifies the list of highways improvements expected to be required. The policy is also clear that a Transport Assessment will be required which will be used to confirm the detailed extent of measures to be delivered. An additional requirement for a car parking management plan is recommended in addition to the policy.

- 4.9 It is argued in the representations that the increased retail capacity at Newnham Court in addition to Next on the adjacent site will be to the detriment of the town centre. The landowner states that redevelopment is not feasible on the existing footprint whilst maintaining continuity of trade and will not be viable or deliverable with the restriction of additional floorspace to 700sqm.
- 4.10 In response, Newnham Court is an existing, established retail destination. The policy specifies that a Retail Impact Assessment will be required to quantify the development's impact on town centre trade. It provides for the re-provision of the existing floorspace with a modest amount of additional floorspace (700sqm) to enable redevelopment. A redevelopment scheme could enable the existing permitted retail floorspace to be set out in a more efficient way, better suited to modern retailers' needs. The Council could aim to enable continuity of trade through its consideration of applications for temporary buildings to be used during construction.

Maidstone East & Royal Mail Sorting Office, Maidstone (Policy RMX1(2))

- 4.11 In response to the representations, detailed changes are recommended to the policy criteria to clarify that a Phase 1 Ecology Study will be required and that compensatory planting will be required if the loss of landscape features is unavoidable.
- 4.12 Additionally, the Inspector for the Baltic Wharf Inquiry (see paragraphs 4.19 to 4.23 below) was critical that the draft Local Plan is not explicit that the Maidstone East/Sorting Office site should include a large food store. The Inquiry, which was held in May 2014, related to a proposal for a foodstore (A1 use class), offices (A2, B1), café/restaurant (A3) and assembly/leisure (D2) uses at the Baltic Wharf site on St Peters Street, which is an 'out of town centre' site in retail planning terms. The Inspector allowed the appeal in July 2014.
- 4.13 The draft policy RMX1(2) states that the site is allocated for up to 10,000sqm of comparison and convenience retailing. The policy was drafted in this way to allow for some flexibility in the exact balance of retail uses on the site in response to market changes. This is still considered a reasonable approach. The nature of retail needs is changing, evidenced recently by the main supermarket operators' focus on smaller convenience stores and away from the largest scale superstores. To respond to the Baltic Wharf Inspector's concern, and to avoid further doubt, it is recommended that the supporting text be amended to clarify that the site would be suitable for a foodstore.
- 4.14 As stated in the Regulation 18 Plan, the Maidstone East/Sorting Office site is the priority location for additional retail floorspace in the town centre. The site is in a key gateway location and benefits from direct links via Week Street to the

heart of the town centre, enabling linked shopping trips and giving the best opportunity for access by sustainable transport modes. It is recommended that retail-led redevelopment remain the priority for this site, as expressed in Policy RMX1(2), with residential as a secondary use. Offices are an identified town centre use and an element of office floorspace would also be appropriate as a further secondary use on this site. To provide clarity, it is recommended that the supporting text of the Local Plan be amended to confirm that a subsidiary element of office floorspace would also be acceptable where this would support or, at the least, not compromise the retail-led requirements for the site set out in the Policy.

Clockhouse Farm, Heath Road, Coxheath (Policy RMX1(4))

- 4.15 This site is allocated for 40 homes and 7,700sqm of office/light industrial floorspace (B1) in the draft Local Plan (Regulation 18).
- 4.16 Subsequently, a planning application for 72 dwellings, up to 43 extra care apartments and land for open space/community use (MA/14/0566) was approved by Planning Committee on 5th February 2015 subject to the completion of a legal agreement.
- 4.17 In view of this updated position, it is recommended that Clockhouse Farm be omitted as a mixed use allocation from Policy RMX1.

Syngenta, Yalding (Policy RMX1(5))

- 4.18 The Environment Agency (EA) has now objected to the proposed 200 dwellings on this site. Following the floods of December 2013, the EA is expecting to publish its revised flood modelling maps by October 2015. The site's potential developers can be expected to want to agree a flood mitigation approach in response to the EA's concerns and the latest published information. Pending this further work, it is proposed that the site be retained as a mixed use allocation in the Local Plan. The position on this site will be monitored as new information from the EA and the site's potential developers becomes available.

Baltic Wharf (formerly known as the Powerhub building)

- 4.19 A representation was received from the owners of Baltic Wharf, St Peters Street in Maidstone stating that their site should be allocated in the Local Plan for a large food store as part of a mixed use development.
- 4.20 This representation to the Reg 18 Plan was made before the Public Inquiry into the Council's refusal of permission for a foodstore (A1 use class), offices (A2, B1), café/restaurant (A3) and assembly/leisure (D2) uses on the Baltic Wharf site was held in May 2014. The appeal Inspector concluded that a foodstore use was the only primary use which would secure the future of this Grade II listed building, provided a retailer would commit to the scheme and allowed the appeal in July 2014.

- 4.21 The appeal Inspector highlighted what he regarded as an imbalance between the draft Local Plan's inclusion of a specific allocation for the Maidstone East/Sorting Office site and the lack of a policy for the Baltic Wharf building, a substantial listed building in the town centre. He stated this was not necessarily an incorrect approach, but the net result was that he gave little weight to the draft Local Plan at the point he was considering the appeal.
- 4.22 Clearly the site now has planning consent; there is no need to allocate the site for the uses for which it has permission. Further, whilst other uses such as residential would be appropriate for the building, an allocation policy citing it as an alternative main use would not be deliverable based on the viability information so recently tested at the appeal.
- 4.23 That said, there is merit in making reference to the site in the Local Plan as a substantial and underused listed building in the town centre, should the position on viability change over the lifetime of the Plan. It is recommended that the supporting text to Policy SP1 – Maidstone Town Centre be amended to confirm that, should the consented scheme not come forward, the Council will consider positively alternative schemes that achieve the retention and restoration of the listed building. Appropriate uses would include housing, offices, leisure uses, cafes and restaurants.

Eclipse Business Park, Maidstone

- 4.24 The landowners propose that Eclipse Business Park should be allocated in Policy RMX1 to enable a more flexible approach to the site's development.
- 4.25 This is an established, modern employment location which provides good quality office space with good levels of associated car parking close to the M20 motorway junction 7. There are further extant consents for additional office development on the site. It is identified in the Local Plan as an established Economic Development Area under Policy DM18; it constitutes an important element of the borough's employment land portfolio and the site is recommended for retention as an employment site in the evidential 'Qualitative Employment Sites Assessment', GVA (2014). It is considered that the best policy approach to secure the future use of this site is to retain it in draft Local Plan Policy DM18 (retention of employment sites). Accordingly, Cabinet agreed this policy, with the inclusion of Eclipse Park, for incorporation into the Regulation 19 version of the Plan when it considered the Development Management policies at its meeting on 14th January 2015.
- 4.26 Policy DM18 sets out the considerations that would be applied if a mixed use scheme incorporating some non B-class elements was proposed within one of the identified Economic Development Areas, such as Eclipse Park. Criterion 4 of the policy indicates that such a proposal may be exceptionally permitted if this would help to demonstrably regenerate the site to better meet modern business needs and would secure the same or improved levels of employment. In this respect the policy provides for an appropriate degree of flexibility, as an exception, as sought by the site's owners.

Springfield, Maidstone

- 4.27 Representations have been received that the Springfield site should be allocated for mixed use under Policy RMX1 rather than for 100% housing.
- 4.28 Springfield can deliver a significant amount of housing on an urban brownfield site and thereby make a significant contribution towards the challenging 'objectively assessed need' for new homes (Policy H1). A revised yield of 500 dwellings was agreed by Cabinet for inclusion in the Regulation 19 Plan on 2nd February 2015. A recent application for a supermarket, supporting retail and a doctors' surgery was refused permission in May 2014 (MA/13/2099) based on concerns about the impact on the town centre trade, amongst others. Faced with alternative ways to meet the borough employment land needs, which is a matter for decision at the August meeting of this Committee, it is not proposed to further change the allocation policy for this site.

Haynes, Ashford Road, Maidstone

- 4.29 Representations were received stating that the allocations in Policy RMX1 do not identify sufficient land to accommodate Maidstone's identified need for retail floorspace. It is argued that a further site should be identified for convenience needs and the Haynes site on Ashford Road, Maidstone could contribute to 5,000sqm retail needs in the short to medium term plus up to 150 dwellings. Policy H1(12) of emerging Plan allocates the Haynes site for some 200 homes (reduced from 250 homes at Cabinet in February 2015). The landowners have stated that 100% residential development is not deliverable on the grounds of viability.
- 4.30 In response, it is considered that the Haynes site can accommodate a significant amount of dwellings on an urban brownfield site to contribute towards the challenging objectively assessed need for new homes (Policy H1). The landowners have not submitted evidence which can be tested to evidence the assertion that 100% residential redevelopment of the site is unviable.
- 4.31 Further, Maidstone East/Sorting Office site (RMX1(2)) is allocated as the priority location to meet retail needs, be it convenience and/or comparison needs, in the short-medium term. Redevelopment of The Mall (Policy SP1) provides for longer term retail needs. Both these locations are sequentially preferable to the Haynes site which is an 'out of centre' site in retail planning terms. In addition, since the Regulation 18 Local Plan was prepared, the supply of consented retail floorspace has been boosted by the consent for between 3,500 and 4,180sqm (net) at Baltic Wharf.
- 4.32 The schedule of proposed changes to Policy RMX1 in Appendix II is recommended for approval for incorporation in the next full draft of the Local Plan (Regulation 19).

5. CONSULTATION RESULTS AND PREVIOUS COMMITTEE FEEDBACK

- 5.1 This report sets out the results of the Regulation 18 consultation as it applies to Policy RMX1. The policy, as amended, will be included in the Regulation 19 version of the draft Local Plan which is scheduled for further public consultation early in 2016.
- 5.2 A Consultation Statement, explaining how the consultation stages have helped to develop the Plan is required to support the Plan when it reaches submission stage (Regulation 22).

6. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION

- 6.1 The policy, as amended, will be included in the Regulation 19 version of the draft Local Plan which is scheduled for further public consultation early in 2016.

7. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
Impact on Corporate Priorities	The adoption of the Local Plan will assist in the delivery of the Council's corporate priorities.	Rob Jarman, Head of Planning & Development
Risk Management		[Head of Service or Manager]
Financial	The development of the Local Plan has been fully funded as part of the council's revenue budget. There are no direct financial implications arising from this report. Ensuring the Local Plan is based on sound evidence will minimise the likelihood of avoidable costs being incurred.	Zena Cook, Section 151 Officer & Finance Team
Staffing		[Head of Service]
Legal	The Council is required to take account of any representations made to them in the preparation of its Local Plan (Reg 18(3) of the Town and Country Planning (Local Planning)_(England) Regulations 2012)	Mid Kent Legal Services, Team Leader (Planning)
Equality Impact Needs Assessment		[Policy & Information Manager]
Environmental/Sustainable Development	The Local Plan is fundamentally concerned with delivering sustainable development objectives.	Rob Jarman, Head of Planning &

		Development
Community Safety		[Head of Service or Manager]
Human Rights Act		[Head of Service or Manager]
Procurement		[Head of Service & Section 151 Officer]
Asset Management		[Head of Service & Manager]

8. REPORT APPENDICES

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

- Appendix I: schedule of issues and responses for Policy RMX1
- Appendix II: schedule of detailed changes to Policy RMX1

9. BACKGROUND PAPERS

Nil

APPENDIX I

Schedule of issues and responses for Policy RMX1

Policy Number RMX1	General objections and representations		
Summary of issues		Officer Response	Proposed change
Character Area Assessments should be prepared prior to accepting planning applications for large developments (parish council)		The council cannot refuse to accept and consider a valid planning application. Policy DM4 provides clear guidance on design matters including the need to respond to local character. A development's response to the local character should be explained in the Design & Access Statement submitted with the application.	No change.
Support (resident)		Support welcomed	No change
The policy should distinguish between in and out of centre retail sites. For out of centre sites the policy should require no impact on town centre sites' viability and deliverability and restrictions on overall floorspace, goods, uses, size/number of units (landowner) .		Policy RMX1(1) for Newnham Court , which is an out of centre site, already sets out the type of criteria which are sought by the respondent.	No change

Policy Number RMX1	Site omissions		
Summary of issues	Officer Response	Proposed change	
<p>RMX1 and H1(12) The allocations in Policy RMX1 do not identify sufficient land to accommodate Maidstone's identified need for retail floorspace. A further site should be identified for convenience needs and the Haynes site could contribute to 5000sqm retail needs in the short to medium term plus up to 150 dwellings. 100% residential development under policy H1(12) is not deliverable on the grounds of viability. (landowner).</p>	<p>The Haynes site can deliver a significant amount of housing on an urban brownfield site to contribute towards the challenging objectively assessed need for new homes (Policy H1). The landowners have not submitted evidence which can be tested, to evidence the assertion that 100% residential redevelopment of the site is unviable.</p> <p>Maidstone East/Sorting Office site (RMX1(2)) is allocated as the priority location to meet retail needs, be it convenience and/or comparison needs, in the short-medium term. Redevelopment of The Mall (Policy SP1) provides for longer term retail needs. Both these locations are sequentially preferable to the Haynes site which is an 'out of centre' site in retail planning terms. In addition, since the Regulation 18 Local Plan was prepared, the supply of consented retail floorspace has been boosted by the consent for between 3,500 and 4,180sqm</p>	No change.	

Policy Number RMX1	Site omissions		
Summary of issues		Officer Response	Proposed change
		(net) at Baltic Wharf.	
The Mall redevelopment should be included in the policy (landowner)		Redevelopment of The Mall is included in the Local Plan as a longer term redevelopment proposal as the site is more complex to deliver and the exact form and nature of development in this location will be the subject of further assessment and refinement in conjunction with the landowners. It is considered appropriate to identify this area as a broad location ahead of this more detailed work being done but this does not prevent redevelopment being delivered earlier in the plan period should the landowners decide to expedite it. The council is very willing to work constructively with the landowners to bring the site forward sooner.	No change.
Eclipse Business Park should be included in Policy RMX1 (and excluded from DM18) to enable a flexible approach towards development (landowner)		This is an established, modern employment location which provides good quality office space with good levels of car parking close to the motorway junction. There are further extant	No change.

Policy Number RMX1	Site omissions		
Summary of issues	Officer Response	Proposed change	
	<p>consents for additional office development on the site. It is an important element on the borough's employment land portfolio. The site is recommended for retention as an employment site in the Qualitative Employment Sites Assessment (2014). Inclusion in Policy DM18 is considered appropriate to secure the future use of this site and this was agreed by Cabinet on 14th January 2015.</p>		
<p>Springfield should be identified as a mixed use site rather than for 100% housing. It can deliver a mix of residential retail and office uses and would be more appropriately allocated for such. (landowner)</p>	<p>The long term business occupants of both the Sorting Office and the Whatman site (at Springfield) are vacating their sites. This prompts the opportunity to consider the future use of these sites by the inclusion of specific site allocations in the draft plan. On balance Springfield can deliver a significant amount of housing on an urban brownfield site to contribute towards the challenging 'objectively assessed need' for new homes (Policy H1).</p>	No change.	

Policy Number RMX1	Site omissions		
Summary of issues	Officer Response	Proposed change	
<p>Baltic Wharf, St Peters Street in Maidstone, should be allocated for a large food store as part of a mixed use development. (landowners)</p>	<p>Since the Reg 18 Local Plan consultation closed, an appeal on this site has been allowed, granting consent for a foodstore, A2, A3, B1 and D2 uses. The Inspector concluded that a foodstore use was the only primary use which would secure the future of the Grade II listed building, provided a retailer could be secured.</p> <p>The inspector highlighted what he regarded as an imbalance between the draft Plan's inclusion of a specific allocation for the Maidstone East/Sorting office site and the lack of a policy for the Baltic Wharf building, a substantial listed building in the town centre. He stated this was not necessarily an incorrect approach, but the net result was that he gave little weight to the draft Local Plan at the point he was considering the appeal.</p> <p>Clearly the site now has planning consent; there is no need to allocate the</p>	<p>Proposed change: add the following to the supporting text for Policy SP1 – Maidstone Town Centre:</p> <p><i><u>"The Baltic Wharf building in St Peters Street is a prominent and substantial Grade II listed building fronting the west bank of the River Medway. Whilst the more modern warehouses adjoining the building are occupied, the main building is currently underused and the future of this listed building would be best secured by putting it into active use. To this end, an appeal was allowed for a large foodstore and other ancillary uses (offices, restaurant & cafe and assembly & leisure uses) in July 2014. Should the consented scheme not come forward, the Council will consider positively alternative schemes that achieve the retention and restoration of the listed building. Appropriate uses would include housing, offices, leisure uses, cafes and restaurants. "</u></i></p>	

Policy Number RMX1	Site omissions		
Summary of issues		Officer Response	Proposed change
		<p>site for the uses for which it has permission. Further, whilst other uses such as residential would be appropriate for the building, an allocation policy citing it as an alternative main use would not be deliverable based on the viability information so recently tested at the appeal.</p> <p>That said, there is merit in making reference to the site in the Local Plan as a substantial and underused listed building in the town centre, should the position on viability change over the lifetime of the Plan. It is recommended that the supporting text to Policy SP1 be amended accordingly.</p>	

Policy Number RMX1(1)	Site Name: Newnham Park		
Summary of issues		Officer Response	Proposed change

Policy Number RMX1(1)	Site Name: Newnham Park		
Summary of issues	Officer Response	Proposed change	
<p>Visual/landscape impact and design:</p> <ul style="list-style-type: none"> • Object to any buildings over 2 storeys (resident) • Object to over development of the site (residents) • Site forms part of the foreground to the AONB which should be protected. Development will damage Horish Wood (Member) • Object to loss of countryside (resident) • Amend criterion 5(ii) to read “Where possible, the retention and enhancement of existing planting. Where existing planting cannot be retained, appropriate mitigation should be provided.” (landowner) • Replace the last sentence of criterion 7 with “ the design of development should take account of and be sensitive to the local landscape” (landowner) 	<p>Regarding building heights, the policy states that two storeys is a maximum across the site with the clear exception of two specified locations where taller buildings could be delivered without undue landscape impact as assessed through the approved outline planning application for the Maidstone Medical Campus (13/1163)</p> <p>Regarding the concern about potential over-development of the site, the policy specifically seeks to limit the amount of additional development across the site and in respect of the medical campus this has been achieved through the granting of an outline consent (13/1163) which specifies the total additional floorspace which will be delivered (98,000sqm). The policy also clearly requires extensive structural and internal landscaping and landscape buffers to help mitigate the visual impact of development. The redevelopment of Newnham Court shopping village is limited to only a</p>	<p>Proposed change: Amend criterion 5(ii) through the addition of a second sentence to read; “the retention and enhancement of existing planting. <u>Where the loss of selected existing planting is unavoidable, appropriate compensatory planting must be provided</u>”</p>	

Policy Number RMX1(1)	Site Name: Newnham Park		
Summary of issues	Officer Response	Proposed change	
	<p>marginal increase on the existing development footprint.</p> <p>Regarding the concern about protection of the AONB foreground, there is already significant existing development in the vicinity of Junction 7, and further development permitted at both Eclipse Park and Maidstone Medical Campus, which impacts to some extent on views towards the AONB. In this context of existing and permitted development, Policy RMX1(1) seeks to mitigate impacts on the setting of the AONB through, for example, explicit landscaping requirements and the control of building heights and siting and lighting. The policy specifically requires a landscape buffer to Horish Wood Local Nature Reserve.</p> <p>Regarding the loss of the countryside, some greenfield loss will be required to accommodate growth needs over the timescale of the Local Plan. Junction 7 is a location where there is already</p>		

Policy Number RMX1(1)	Site Name: Newnham Park		
Summary of issues		Officer Response	Proposed change
		<p>significant, existing development and where the principle of further development is already established through planning consents.</p> <p>Regarding criterion 5(ii), it is accepted that this criterion could be improved by confirming what measures would be required if the loss of existing planting is demonstrably unavoidable.</p> <p>Regarding criterion 7, as drafted the criterion gives clear direction to developers that conventional retail warehouse-style development would be inappropriate in this location. The respondent's proposed criterion does not give this specificity.</p>	
<p>Transport:</p> <ul style="list-style-type: none"> If development is combined with others in the locality, it should be able to support sustainable transport (infrastructure provider) Concern about highway impacts (congestion) including on 		<p>Regarding sustainable transport measures, comment noted.</p> <p>Regarding highway impacts, the transport measures in the policy have been agreed with KCC Highways as highway authority. Further, the highway measures</p>	<p>Amend criterion 14 to read "submission of a Travel Plan, <u>to include a car park management plan</u>, to be approved by the Borough Council "</p>

Policy Number RMX1(1)	Site Name: Newnham Park		
Summary of issues	Officer Response	Proposed change	
<p>A249 and strategic highway junctions, and impact on car parking (Member; residents; Swale BC)</p> <ul style="list-style-type: none"> List of transport requirements in the policy may not be appropriate for the scale of retail redevelopment proposed in the policy. The detailed requirements listed were not all applied to the approved medical campus scheme. The policy should state that a TA will be required and mitigation shown necessary carried out. (landowner) 	<p>associated with the medical campus have been confirmed through the determination of the outline application (MA/13/1163). There was no highway objection to the Land Securities proposal for the redevelopment of Newnham Court shopping village for which permission was refused (MA/13/1931), notwithstanding that the floorspace of that scheme was significantly greater than Policy RMX1(1) permits. In view of the demand for car parking that the site will generate, the requirement for a car parking management plan should be added as a development requirement.</p> <p>For clarity, the policy specifies the list of highways improvements expected to be required . The policy is also clear that a Transport Assessment will be required which will be used to confirm the detailed extent of measures to be delivered .</p>		

Policy Number RMX1(1)	Site Name: Newnham Park		
Summary of issues	Officer Response	Proposed change	
<p>Newnham Court:</p> <ul style="list-style-type: none"> Increased retail capacity, in conjunction with Next, will be to the detriment of the town centre (Member; residents). There has been no retail impact analysis on Sittingbourne town centre (Swale BC). Site does not pass the sequential test (Member). This out of town retail site should not be allocated in the Local Plan (landowner). Development will result in the creation of a free standing out of centre retail park which will compete with the town centre. Other sites such as Baltic Wharf are sequentially preferable (developer). Capacity for additional retail floorspace should be allocated at Newnham Court to help accommodate predicted retail capacity and resist leakage in the shorter term (developer). The Land Securities scheme will not cause significant harm to the town centre (developer). There are no other sequentially preferable sites (developer). The extent of existing retail floorspace on the site has not been justified (developer) The existing extent of A1 floorspace is 22,388sqm not 14,300sqm (developer) Redevelopment is not feasible on the existing footprint whilst maintaining continuity of trade without which the development will not happen. The allocation boundaries 	<p>Regarding town centre impacts, Newnham Court is an existing, established retail destination. The Policy provides for the re-provision of the existing floorspace with a modest amount of additional floorspace. The policy specifies that a retail impact assessment will be required to provide evidence of the development's impact on town centre trade. In terms of the analysis of the policy's impact on Sittingbourne town centre, it is of note that Swale BC did not raise an objection to the much larger, Land Securities retail proposal on this site (MA/13/1931). For clarity however, criterion 8 of the policy could be amended to refer to impacts on town and local centres in the plural.</p> <p>The Local Plan also identifies sequentially preferable locations for new and improved retail in and at the edge of the town centre (The Mall; Maidstone East & the Sorting Office). The Baltic Wharf site now has permission for a foodstore (up</p>	<p>Amend criterion 8 to read “ submission of a retail impact assessment which clearly demonstrates that the retail development has no significant adverse impact on the town <u>and local</u> centres_ “</p>	

Policy Number RMX1(1)	Site Name: Newnham Park		
Summary of issues	Officer Response	Proposed change	
<p>should reflect that submitted in Land Securities application. (landowner)</p> <ul style="list-style-type: none"> • Redevelopment will not be viable or deliverable with the restriction of additional floorspace to 700sqm. The figure is not justified by evidence (landowner). • The exclusion of all non-A1 uses is unnecessarily restrictive. The test should be demonstration of no harm to the town centre (landowner) • The blanket restriction on goods in the policy should be removed (landowner) • The policy should not allow for food retail as there are sequentially preferable sites (Haynes). This restriction should be explicit in the wording of the policy. (landowner) 	<p>to 4,180sqm). In refusing the Land Securities' application, the Council concluded that the proposal would have significant adverse impacts on town centre trade.</p> <p>Regarding the existing extent of A1 retail floorspace, the Council considers that some 14,300sqm on the Newnham Court site is in established retail use. This includes covered and uncovered permanent sales and display areas and excludes areas used for the temporary display of goods.</p> <p>The Council would aim to enable continuity of trade through its consideration of applications for temporary buildings to be used during construction.</p> <p>Regarding the additional floorspace, a modest amount of additional floorspace is provided for in the policy to help enable redevelopment. In addition a</p>		

Policy Number RMX1(1)	Site Name: Newnham Park		
Summary of issues		Officer Response	Proposed change
		<p>redevelopment scheme would enable the existing permitted retail floorspace to be set out in a more efficient way, in footplates better suited to modern retailers' needs.</p> <p>Regarding the restriction of non A1 uses, the town centre must be protected as the key shopping destination and this role is significantly enhanced by its variety of supporting uses such as cafes and restaurants. It is important that the role of Newnham Court does not expand to directly compete with the town centre necessitating control over the nature of supporting uses on the site.</p> <p>Regarding the goods restriction, fashion and clothing are key drivers of trade in the town centre. The goods restriction as proposed helps to secure the future of the town centre as the key retail destination in the borough. An element of convenience (food) retailing may be appropriate subject to the sequential and</p>	

Policy Number RMX1(1)	Site Name: Newnham Park		
Summary of issues		Officer Response	Proposed change
		impact tests being met.	
Support (business representative; resident; developer)		Support welcomed.	No change.
Medical hub: <ul style="list-style-type: none"> • Question labour supply implications of the Maidstone Medical hub and the consequent economic and transport implications for Swale BC (SBC). • Concern that the delivery of highly paid jobs is not guaranteed (resident) 		Regarding the labour supply and transport implications of medical hub for Swale BC, this development now has outline consent (13/1163). SBC did not object to the outline application for the medical campus. KCC Highways did and do not object to the proposals. Regarding the delivery of high quality jobs, the allocation of the site, and the granting of outline consent, demonstrably increases the prospect of the proposal, and the associated jobs, being delivered.	No change.
Additional development criterion to be met: 'Utility infrastructure: Existing underground sewers on site are protected, or appropriate arrangements are made for their diversion' (Southern Water).		This is a detailed matter which, whilst supported, will be addressed through the detailed design of a scheme at planning application stage	No change.
Requirement for a development brief is unreasonable as the majority		Regarding the need for a development brief, this is still considered beneficial,	No change.

Policy Number RMX1(1)	Site Name: Newnham Park		
Summary of issues	Officer Response	Proposed change	
of the site has consent. (landowner)	particularly in the absence of an approved consent at Newham Court and detailed approval of the medical campus development.		

Policy Number RMX1(2)	Site Name: Maidstone East & Sorting Office		
Summary of issues	Officer Response	Proposed change	
<p>Design:</p> <ul style="list-style-type: none"> Concern about the visual impact of high density residential blocks (Member; residents). Views across the site should be protected in full rather than as stated in criterion (2) (resident) Concern about loss of trees on Sandling Road (Member; residents) Development should retain semi-natural habitat of the quarry slopes (Member; residents) 	Regarding the visual impact of development, the policy includes safeguards to help retain views of Sessions House from the west. This is a site of significant size, close to the heart of the town, occupied and surrounded by buildings of significant scale and height (Brenchley House, Sessions House, Invicta House, Sorting Office building). With this strong urban context, it is considered that the site is appropriate for development of the significant scale and density proposed, provided the design and layout considerations in the policy are adhered	<p>Amend criterion 9 to read “the incorporation of landscaped elements within the overall scheme design including the retention of existing landscape features where possible. Where the loss of existing landscape features is unavoidable, appropriate compensatory planting must be provided”</p> <p>Add a new criterion to read “development will be subject to the results and recommendations of a phase 1 ecological survey”</p>	

Policy Number RMX1(2)	Site Name: Maidstone East & Sorting Office		
Summary of issues	Officer Response	Proposed change	
	<p>to.</p> <p>Regarding the potential loss of trees, the policy requires the retention of landscape features where possible. It is considered that the integration of the development with the street scene will be best achieved by the creation of an 'active frontage' to Sandling Road. This could comprise features such as entrances and shop windows. To achieve this key benefit, some trees will be lost. In response it is recommended that the policy is amended to include a requirement for compensatory planting.</p> <p>Regarding habitat retention, it is recommended that a further criterion is added requiring an ecological survey of the site.</p>		
Concern about traffic generation and local air pollution levels (Members; residents)	Regarding traffic generation, this is a town centre site which by virtue of its existing/most recent use is an established traffic generator. KCC Highways has been	No change.	

Policy Number RMX1(2)	Site Name: Maidstone East & Sorting Office		
Summary of issues		Officer Response	Proposed change
		party to the drafting of the policy for the site and has not raised any objection to the allocation of the site and the uses proposed. As a town centre site, the site has good levels of accessibility by public transport, most notably by train, and good direct pedestrian connections from the town centre. With these accessibility characteristics the potential to access the site by sustainable modes is significant with consequent benefits for traffic generation and air quality impacts.	
Concern about impact on school and medical facilities (Member; residents)		Regarding the impact on school and medical facilities, the cumulative impact of the totality of the development proposed in the draft Local Plan on services and infrastructure is assessed as part of the refinement of the Infrastructure Delivery Plan. The relevant infrastructure providers have not objected to the allocation of this site in the Local Plan.	No change

Policy Number RMX1(2)	Site Name: Maidstone East & Sorting Office		
Summary of issues	Officer Response	Proposed change	
<p>Uses:</p> <ul style="list-style-type: none"> • Should be 100% housing or housing-led (resident) • Site should be used for employment and transport purposes (Members) • Housing should be substituted with a multi storey car park for which there is a greater need (resident) . • Question that there is no clear evidence of the deliverability of retail on this site. Site is unlikely to be attractive for prime retail development. Site has been undeliverable for 10 years which casts doubt on the viable delivery of the site in the short-medium term. A residential led scheme with some office component, transport interchange and ancillary retail would be more deliverable. (agent; landowner) • Site should be prioritised for comparison goods retailing in the light of the retail capacity study findings (developer). • Query whether the development proposed is deliverable when planning, parking and railway operational requirements are taken into account. Also query whether the site is available (developer). • Site not large enough to accommodate the entire identified 	<p>The site is the best, most significant opportunity to provide for the evidenced demand for additional retail floorspace on a site which is close to and accessible from the heart of the town centre. Redevelopment of the site as proposed will help to sustain the town centre as an important shopping destination. The current application for a mixed retail development, commuter car parking and railway station improvements (MA/14/500483/OUT) provides evidence of the site's availability and deliverability. The policy as drafted does not require specific proportions of comparison and/or convenience retail floorspace to offer a degree of flexibility to meet market demands. Recognising that retail is the priority use, the site can accommodate some housing either in a separate block or on upper floors. It may be that the site could also accommodate an element of office floorspace as a supporting use, provided that this does</p>	<p>Add the following text to paragraph 7.11 "This edge of centre site is considered suitable for a combination of comparison and convenience retailing. <u>This could include a large foodstore.</u></p> <p>Add the following text to the end of paragraph 7.12: "<u>Additionally a subsidiary element of office development would be acceptable provided this does not compromise the retail requirements for the site expressed in Policy RMX1(2).</u>"</p>	

Policy Number RMX1(2)	Site Name: Maidstone East & Sorting Office		
Summary of issues	Officer Response	Proposed change	
<p>need for convenience goods. The likely format would meet half the identified need which would compromise the ability to meet comparison needs and lead to pressure for out of town development (landowner).</p> <p>Additionally, the Inspector for the Baltic Wharf Inquiry was critical that the draft Local Plan is not explicit that the Maidstone East/Sorting Office site should include a large foodstore.</p>	<p>not undermine the achievement of retail floorspace on the site, and it is suggested that the supporting text be amended accordingly. Subject to detailed agreement, the commuter car parking which is provided as part of the redevelopment may also be available for public use.</p> <p>The current planning application provides for a significant scale foodstore (8,296sqm GIA) and comparison retail (4,364sqm GIA). In addition, since the Reg 18 Local Plan was prepared, the supply of consented floorspace has been boosted by the consent for between 3,500 and 4,180sqm (net) at Baltic Wharf. Regarding the Baltic Wharf Inquiry Inspector's comments, the draft policy RMX1(2) states that the site is allocated for up to 10,000sqm of comparison and convenience retailing. This was drafted in this way to allow for some flexibility in the exact balance of uses on the site in response to market changes. This is still</p>		

Policy Number RMX1(2)	Site Name: Maidstone East & Sorting Office		
Summary of issues		Officer Response	Proposed change
		considered a reasonable approach. The nature of retail needs is changing, evidenced recently by the main supermarket operators' focus on smaller convenience stores and away from the largest scale superstores. To respond to the Inspector's concern and to clarify that the site would be suitable for a foodstore, it is recommended that paragraph 7.11 of the supporting text be amended accordingly.	
Support redevelopment (resident; landowner)		Support welcomed.	No change.
Poor train service needs to be addressed prior to any development (resident)		The Council will continue to use its influence to secure improved services for the borough. A pre-requisite for further improved services before the development of this site would not comply with the tests in the NPPF (paragraph 204).	No change.
Policy should allow for a phased approach to development to allow for the residential redevelopment of land south of the station after the commuter car parking has been re-provided as part of the		The policy as drafted does not preclude this approach.	No change

Policy Number RMX1(2)	Site Name: Maidstone East & Sorting Office		
Summary of issues	Officer Response	Proposed change	
redevelopment of the land north of the railway (developer)			
Criterion 18: improvements to Sessions Square to be delivered through contributions (developer)	The mechanism to deliver public realm improvements to Sessions Square is a matter which is being resolved through the current planning application	No change	
Policy should allow for noise assessment and sustainable drainage strategy information to be submitted with subsequent detailed applications.(developer)	The policy does not preclude these being prepared at the detailed application stage	No change.	
Additional development criterion to be met: 'Utility infrastructure: Existing underground sewers on site are protected, or appropriate arrangements are made for their diversion' (Southern Water).	This is a detailed matter which, whilst supported, will be addressed through the detailed design of a scheme at planning application stage	No change	

Policy Number RMX1(3)	Site Name: King Street, Maidstone		
Summary of issues	Officer Response	Proposed change	
<p>Uses:</p> <ul style="list-style-type: none"> Question whether the site can accommodate the scale of development proposed when car parking requirements are 	The current approved application on the eastern part of the site for a sheltered housing scheme (MA/14/505005) provides evidence of the site viability for	No change.	

Policy Number RMX1(3)	Site Name: King Street, Maidstone		
Summary of issues		Officer Response	Proposed change
<p>taken into account. It is an unviable location for a foodstore . The combined existing values of the site exceeds residential and retail uses (developer)</p> <ul style="list-style-type: none"> Site should be allocated for a medical centre (Member) 		residential redevelopment. The remaining part of the site is in the Council's control to bring forward for mixed or retail redevelopment. Car parking requirements should take account of the site's town centre location, with good levels of accessibility to public transport. The NHS Property team is not advocating additional medical facilities in the town centre.	

Policy Number RMX1(4)	Site Name: Clockhouse Farm, Heath Road, Coxheath		
Summary of issues		Officer Response	Proposed change
General concern about the lack of infrastructure in Coxheath (residents)		Regarding infrastructure in Coxheath, the cumulative impact of the totality of the development proposed in the draft Local Plan on services and infrastructure is being assessed as part of the refinement of the Infrastructure Delivery Plan. The relevant infrastructure providers have	No change to RMX1(4)

Policy Number RMX1(4)	Site Name: Clockhouse Farm, Heath Road, Coxheath		
Summary of issues		Officer Response	Proposed change
		not objected to the allocation of this site.	
Concern about the highway impacts of the development (residents)		KCC Highways has raised no objections to the allocation of this site as proposed.	No change.
Object to commercial element. Industrial units are not needed/available elsewhere. Proposals do not comply with Policy DM7. Development should be 100% housing (residents). Coxheath is a Larger Village, not an RSC, so the employment floorspace in this allocation should be removed. Access to the strategic road network is limited (Parish Council).		<p>This site is allocated for 40 homes and 7,700sqm of office/light industrial floorspace (B1) in the draft Local Plan (Regulation 18).</p> <p>Subsequently, a planning application for 72 dwellings, up to 43 extra care apartments and land for open space/community use (14/0566) was approved by Planning Committee on 5th February 2015 subject to the completion of a legal agreement.</p> <p>In view of this updated position, it is recommended that Clockhouse Farm be omitted as a mixed use allocation from Policy RMX1.</p>	Amend Policy RMX1 to omit site (4) Clockhouse Farm, heath Road, Coxheath.
Clock House is of historical and architectural interest (Parish Council)		Criterion 6 of the policy requires the strengthening of the southern hedgerow to separate development from the farm	No change

Policy Number RMX1(4)	Site Name: Clockhouse Farm, Heath Road, Coxheath		
Summary of issues	Officer Response	Proposed change	
	complex. Further, in view of the decision to grant planning permission for the application 14/0566, it is recommended that this site be omitted from Policy RMX1.		
Object to loss of agricultural land (residents; Parish Council)	This land has been assessed as of Grade 3a quality. The loss of this land from agricultural production is not considered to outweigh the overall benefits of the proposed development. Further, in view of the decision to grant planning permission for the application 14/0566, it is recommended that this site be omitted from Policy RMX1.	No change.	
Concern that two storey accommodation is impractical for the elderly (resident)	Development will be designed to be fit for purpose for example through the installation of lifts. Further, in view of the decision to grant planning permission for the application 14/0566, it is recommended that this site be omitted from Policy RMX1.	No change.	
Question deliverability of a medical centre (resident)	Coxheath Parish Council has stated that it	No change.	

Policy Number RMX1(4)	Site Name: Clockhouse Farm, Heath Road, Coxheath		
Summary of issues		Officer Response	Proposed change
		is in direct discussions with the existing health centre about this site. Further, in view of the decision to grant planning permission for the application 14/0566, it is recommended that this site be omitted from Policy RMX1.	
Site falls within the Special Landscape Area (resident)		This site immediately adjoins the built up area of Coxheath. The policy requires the strengthening of existing hedgerow boundaries to help mitigate the landscape impact of development. The emerging Landscape Capacity Study (2015) identifies that this site has moderate capacity for development. Further, in view of the decision to grant planning permission for the application 14/0566, it is recommended that this site be omitted from Policy RMX1.	No change
Additional development criterion to be met: 'Utility infrastructure: A connection is provided to the local sewerage system at the nearest point of adequate capacity, as advised by Southern Water' (Southern Water)		This is a detailed matter which, whilst supported, will be addressed through the detailed design of a scheme at planning application stage. Further, in view of the decision to grant planning permission for	No change.

Policy Number RMX1(4)	Site Name: Clockhouse Farm, Heath Road, Coxheath		
Summary of issues		Officer Response	Proposed change
		the application 14/0566, it is recommended that this site be omitted from Policy RMX1.	

Policy Number RMX1(5)	Site Name: Former Syngenta Works, Yalding		
Summary of issues		Officer Response	Proposed change
<p>Uses:</p> <ul style="list-style-type: none"> Site is unsuitable for commercial use because of restricted highway access for HGVs (level crossing and narrow bridge) (residents) consider for employment related uses only (agent; resident; member) 		<p>This is a brownfield site which was last in industrial/employment use. The site is less than a mile from A228 which itself links directly to M20 at J4. KCC Highways has not objected to the commercial use of the site.</p> <p>Subject to the resolution of flooding issues, this site is considered suitable for a mix of residential and commercial uses. Outline consent has previously been granted for 19 houses on the adjoining site, adjacent to Yalding Station. Including residential development as part of the mix of uses will benefit the development</p>	No change

Policy Number RMX1(5)	Site Name: Former Syngenta Works, Yalding		
Summary of issues	Officer Response	Proposed change	
	viability of this brownfield site.		
<p>Flooding:</p> <ul style="list-style-type: none"> Concerns about flooding and scope for mitigation (resident; agent; parish council). Concern that measures may have adverse implications for other parts of the village (residents). Object to 200 dwellings at The Syngenta site at Yalding. The site is mostly within an area at high risk to flooding (Flood Zone 3), with a very small part at medium flood risk (Flood Zone 2). We were not completely satisfied with the conclusions of a previous Flood Risk Assessment and it has been subject to flooding on several occasions in the past including October 2000 and December 2013, when practically the entire site was inundated with floodwater. It is difficult to envisage how the site can be made safe against flooding without significantly increasing the risk elsewhere and so doubt whether a proposed allocation for residential development could pass either the Sequential or the Exception Test. Given the recent flood history we would object to any form of residential development at this site. Reference is made to a “sustainable drainage approach to flood mitigation”. While we would welcome the use of sustainable drainage from the site, it should not be confused 	<p>Following the floods of December 2013, the Environment Agency will publish its revised flood modelling maps by October 2015. The site’s developers can be expected to want to agree a flood mitigation approach in response to the EA’s concerns and the latest published information. Pending this further work, it is proposed that the site remain as a mixed use allocation in the Local Plan.</p>	<p>No change at this stage. The position on this site will be monitored as new information from the EA and the site’s developers becomes available.</p>	

Policy Number RMX1(5)	Site Name: Former Syngenta Works, Yalding		
Summary of issues		Officer Response	Proposed change
as a technique for reducing flood risk to the site, but should be viewed as a technique to reduce flood risk downstream, improve water quality of the receiving watercourse and possibly enhance the local environment (Environment Agency) .			
Unsuitable location in terms of public transport (infrastructure provider)		The site is very well related to Yalding station. The policy requires additional improvements to public transport serving the site.	No change
Concern about increased congestion in Yalding (resident)		KCC Highways has not objected to the proposed allocation of this site.	No change.
Site has poor walking connections with the village (resident)		The policy requires improved pedestrian connections to Yalding.	No change.
Concern about the capacity of local services and facilities for a development of this scale. (residents)		Infrastructure providers have been consulted as part of the development of the Infrastructure Delivery Plan. This has not revealed any 'showstoppers' to the development proposed at Yalding.	No change.
Additional development criteria to be met: 'Utility infrastructure: A connection is provided to the local sewerage system at the nearest point of adequate capacity, as advised by Southern Water' and		This is a detailed matter which, whilst supported, will be addressed through the detailed design of a scheme at planning	No change.

Policy Number RMX1(5)	Site Name: Former Syngenta Works, Yalding		
Summary of issues		Officer Response	Proposed change
'Existing underground sewers on site are protected, or appropriate arrangements are made for their diversion' (Southern Water)		application stage	

Appendix II – schedule of detailed changes to PolicyRMX1

Site reference	Site name & address	Change	Reason
RMX1(1)	Newnham Park, Bearsted Road, Maidstone	Proposed change: Amend criterion 5(ii) though the addition of a second sentence to read; “the retention and enhancement of existing planting. <u>Where the loss of selected existing planting is unavoidable, appropriate compensatory planting must be provided</u> ”	To clarify the Council’s requirements for replacement landscaping.
RMX1(1)	Newnham Park, Bearsted Road, Maidstone	Amend criterion 8 to read “ submission of a retail impact assessment which clearly demonstrates that the retail development has no significant adverse impact on the town <u>and local</u> centres “	To clarify the requirements of the retail impact assessment
RMX1(1)	Newnham Park, Bearsted Road, Maidstone	Amend criterion 14 to read “submission of a Travel Plan, <u>to include a car park management plan</u> , to be approved by the Borough Council “	In view of the differentiated demand for car parking that the separate uses across the site will generate, a car parking management plan is required.
RMX1(2)	Maidstone East & Maidstone sorting office	Amend criterion 9 to read “the incorporation of landscaped elements within the overall scheme design including the retention of existing landscape features where possible. <u>Where the loss of existing landscape features is unavoidable, appropriate compensatory planting must be provided</u> ”	To clarify the Council’s requirements for replacement landscaping.
RMX1(2)	Maidstone East & Maidstone sorting office	Add a new criterion to read “ <u>development will be subject to the results and recommendations</u>	To overcome an omission from the policy to ensure ecological value is assessed and responded to.

Site reference	Site name & address	Change	Reason
		<u>of a phase 1 ecological survey</u>	
RMX1(2)	Maidstone East & Maidstone sorting office	Add the following text to paragraph 7.11 “This edge of centre site is considered suitable for a combination of comparison and convenience retailing. <u>This could include a large foodstore.</u>	For the avoidance of doubt.
RMX1(2)	Maidstone East & Maidstone Sorting Office	Add the following text to the end of paragraph 7.12: <u>“Additionally a subsidiary element of office development would be acceptable provided this does not compromise the retail requirements for the site expressed in Policy RMX1(2).”</u>	For clarification.
RMX1(4)	Clockhouse Farm, Coxheath	Delete site (4) Clockhouse Farm, Heath Road, Coxheath from Policy RMX1.	To reflect the decision of Planning Committee to grant permission for residential, and extra care units and open space/community uses on this site (MA/14/0566) subject to the completion of a legal agreement.
-	Baltic Wharf, St Peters Street, Maidstone	Proposed change: add the following to the supporting text for Policy SP1 – Maidstone Town Centre: <u>“The Baltic Wharf building in St Peters Street is a prominent and substantial Grade II listed building fronting the west bank of the River Medway. Whilst the more modern warehouses adjoining the building are occupied, the main building is currently underused and the future of this listed building would be best secured by putting it into active use. To this end, an appeal was allowed for a large foodstore and other</u>	To set the Council’s approach to this site should the extant consent for a foodstore not be implemented.

Site reference	Site name & address	Change	Reason
		<u>ancillary uses (offices , restaurant & cafe and assembly & leisure uses) in July 2014. Should the consented scheme not come forward, the Council will consider positively alternative schemes that achieve the retention and restoration of the listed building. Appropriate uses would include housing, offices, leisure uses, cafes and restaurants. “</u>	

Item 16: Maidstone Borough Local Plan – mixed use allocations

An email has been received from the Chief Executive of Gallagher Properties Ltd in respect of Eclipse Business Park.

"We write briefly in respect to the proposals before you this evening on mixed use development (item 16 on agenda) and specifically concerning Eclipse Park.

Eclipse Park is already mixed use (office, retail and hotel) and we have made representations to the Local Plan consultations advising that we see the future development of Eclipse Park to be a continuance of this mix.

Such a vision is in keeping with the market and occupier demand. Demand for larger office developments is virtually nil, replaced by a need for smaller office suites available on shorter, flexible terms. Institutional funding for the smaller flexible units is not available due to uncertainty of income and so would need to be alternatively funded.

With regard to retail we recognise that the Council seeks to promote and protect the town centre however there will be some retail that just will not go into the town centre (the NEXT Home & Fashion store being an example). In such circumstances Maidstone will have the choice of edge / out of town or not at all. The NEXT store has been a positive addition to the Maidstone economy and some additional retail of similar quality should not be excluded from our collective thinking, subject to the same sequential and impact test proposed for additional food retailing at Newnham Court (see Officers response to Newnham Court Appendix One).

We would like to emphasise that whatever the use, all future development at Eclipse Park will be of high quality using attractive materials and well designed, befitting a quality, mixed use, destination.

We recognise that the park and ride situation needs to be resolved and have made separate representations on how that could happen.

Eclipse Park is strategically very well positioned and the main infrastructure is in place so it is readily delivered. It is already providing high levels of employment and the remaining development can provide further employment across a wide range of occupations providing planning policies and planning decisions are in keeping with investor / occupier needs and requirements.

We would therefore ask that the Council consider Eclipse Park as a mixed use development in the fashion outlined above."

The appropriate land uses for Eclipse Park are discussed in the report.

Agenda Item 14

Strategic Planning, Sustainability and Transportation Committee

18 August 2015

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

Yes

Maidstone Borough Local Plan open space allocations

Final Decision-Maker	Strategic Planning, Sustainability and Transport Committee
Lead Director or Head of Service	Rob Jarman, Head of Planning and Development
Lead Officer and Report Author	Chris Berry, Consultant Planner and Cheryl Parks, Project Manager
Classification	Non-exempt
Wards affected	All wards

This report makes the following recommendations to the final decision-maker:

1. That new draft policy OS1 in respect of strategic natural and semi-natural open space allocations is approved for inclusion in the draft Maidstone Borough Local Plan for public consultation (Regulation 18¹).
2. That the promotion of potential additional sites for strategic natural and semi-natural open space is sought through the public consultation process as part of the Regulation 18 consultation for draft policy OS1.
3. That further amendments to policy DM11 Publicly Accessible Open Space and Recreation, relating to a sequential approach for open space delivery, are approved for inclusion in the draft Maidstone Borough Local Plan for public consultation (Regulation 18).

This report relates to the following corporate priorities:

- Keeping Maidstone Borough an attractive place for all
- Encouraging good health and wellbeing
- Ensuring there are good leisure and cultural attractions

Timetable

Meeting	Date
Strategic Planning, Sustainability and Transport Committee	18 August 2015

¹ The Town and Country Planning (Local Planning) (England) Regulations 2012

Maidstone Borough Local Plan open space allocations

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 On 14 July 2015 the Committee approve revisions to Policy DM11 Publicly Accessible Open Space and Recreation for further public consultation (regulation 18). Policy DM11 sets quantitative, qualitative and accessibility standards for five types of open space provision: amenity green space; provision for children and young people; publicly accessible outdoor sports; allotments and community gardens; and natural/semi-natural areas of open space.
 - 1.2 Due to the extent of land required to deliver natural and semi-natural open space as part of new housing development (6.5ha/1,000 population), it can often be difficult to provide such strategic open space on site, which is the council's preferred approach, without compromising the dwelling yield from development. This report therefore recommends land allocations for strategic natural and semi-natural open space provision, predominantly associated with strategic locations for housing development. Future development will be expected to provide for all types of open space in accordance with draft policy DM11, not just those sites proposed in this report.
 - 1.3 The strategic open space allocations approved by the Committee will subsequently be included in a draft policy in the local plan for public consultation (Regulation 18).
 - 1.4 As a result of the assessment of strategic open space site allocations, further revisions to policy DM11 Publicly Accessible Open Space and Recreation are proposed, to make clear the sequential approach to the delivery of all open space as part of future development.
-

2. INTRODUCTION AND BACKGROUND

- 2.1 High quality, publicly accessible open space can bring about opportunities for promoting social interaction and inclusion in communities, and contribute positively to well-being and quality of life. Open space can also have a positive impact on the quality of the built and natural environments, and the National Planning Policy Framework (NPPF) encourages the provision and retention of high quality open space (a stance which the council supports).
- 2.2 On 14 July 2015, this Committee approved for further consultation, revisions to Policy DM11 Publicly Accessible Open Space and Recreation relating to standards of provision for five categories of open space: amenity green space; provision for children and young people; publicly accessible outdoor sports; allotments and community gardens; and natural/semi-natural areas of open

space. The report considered in detail the justification for these standards and noted that new development will be required to provide the range of open space types by quantity and to the desired quality, insofar as the development is of sufficient size to deliver the minimum identified size of facility. All new development will be required to meet the open space standards set out in policy DM11 through on site or off-site provision, or through appropriate contributions towards enhancing or improving capacity of existing provision. The sequential approach towards open space and recreation provision is set out in more detail under section 4 of the report.

- 2.3 In addition to identifying future standards for provision, the Committee has sought assurances that appropriate areas of publicly accessible natural and semi-natural open space can be provided adjacent to areas allocated for future housing in the draft Maidstone Borough Local Plan, including the strategic housing locations to the south-east and north-west of the Maidstone urban area, the rural service centres of Harrietsham, Lenham, Marden, Staplehurst, Headcorn and larger villages of Coxheath, Boughton Monchelsea, Eythorne Street, Sutton Valence and Yalding.
- 2.4 The extent of land required to deliver natural and semi-natural open space as part of new housing development (6.5ha/1,000 population), can be difficult to provide on-site without compromising the dwelling yield from development. This report therefore focuses on strategic allocations of natural and semi-natural open space. Development that cannot deliver on site natural and semi-natural open space will be required to make off-site provision, or to make contributions towards such provision.
- 2.5 Although the report focuses on natural and semi-natural open space allocations within the strategic development areas of the settlement hierarchy, development sites within the urban area will also be expected to meet open space standards so further provision of strategic open space (or contributions towards such provision) will be sought. A case in point is at Cross Keys, Bearsted where 2.3ha of natural and semi-natural open space is being provided as part of development.
- 2.6 The strategic open space allocations in the report are predominantly associated with future housing development. The exception is Tongs Meadow at Harrietsham where a former draft housing allocation has been deleted because, due to the site's ecological sensitivity, it is highly unlikely that a licence for translocation of wildlife would be granted by Natural England. Tongs Meadow is proposed to be allocated as natural/semi-natural open space.
- 2.7 The habitats and species that will be encouraged as part of the natural and semi-natural open spaces will be determined according to the existing interest of the site and the part it should play in enhancing existing habitat networks/ connectivity.
- 2.8 Where public access to land is not encouraged due to its ecological sensitivity, these areas should be easily distinguished from land made available as accessible public open space.

- 2.6 Following the approval of a standard for the provision of 6.5 hectares per 1000 population for this category of open space, proposed allocated sites in the draft local plan will generate new population and potential natural and semi-natural open space requirements for each of the strategic housing locations.

Area	Units	Projected Population	Open space (ha) required to meet agreed standard
North west	1157	2777	18.05
South east	2903	6967	45.28
Harrietsham	247	593	3.85
Lenham	1665	3996	25.98
Marden	448	1076	6.99
Staplehurst	710	1704	11.08
Headcorn	378	907	5.90
Coxheath	492	1181	7.67
Yalding	265	636	4.13
Boughton Monchelsea	191	459	2.98
Eythorne Street	39	94	0.61
Sutton Valence	40	96	0.62

Table 1: Open space requirements by development area

A detailed breakdown of the individual totals for each area is included on a site by site basis in Appendix 1 of this report.

3. AVAILABLE OPTIONS

- 3.1 **A:** Proceed without allocations and rely upon the standards set out in policy DM11 to deliver open space.
- 3.2 **B:** Proactively allocate land for open space provision to meet the needs arising from housing growth.

4. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS

Preferred option - Policy OS1 for strategic open space allocations

- 4.1 During the development of the local plan, landowners, developers and other stakeholders have submitted open space proposals to the council as part of wider development schemes. These submissions and development sites more generally have been assessed in terms of their suitability for the delivery of strategic open space allocations. Table 2 identifies the size and location of each proposed open space allocation and demonstrates that significant areas of strategic open space could be provided through the policy.

Area	Location	Open space
North west	East of Hermitage Lane, Maidstone	10.00 ha
	Oakapple Lane, Barming	1.50 ha
South east	Langley Park, Sutton Road, Boughton Monchelsea	5.00 ha
	Bicknor Farm, Sutton Road, Otham	16.00 ha
	South of Sutton Road, Langley ²	11.00 ha
Harrietsham	South of Ashford Road, Harrietsham	1.37 ha
	Church Road, Harrietsham	1.22 ha
	Tongs Meadow, West Street, Harrietsham	3.30 ha
Marden	The Parsonage, Goudhurst Road, Marden	3.20 ha
Staplehurst	Hen & Duckhurst Farm, Marden Road, Staplehurst	4.66 ha
	Fishers Farm, Fishers Road, Staplehurst	6.24 ha
	North of Henhurst Farm, Staplehurst	5.78 ha
Headcorn	Ulcombe Road and Mill Bank, Headcorn	1.50 ha
	South of Grigg Lane, Headcorn	2.40 ha
Coxheath	North of Heath Road (Older's Field), Coxheath	2.34 ha
Yalding	Former Syngenta Works, Hampstead Lane, Yalding	26.20 ha
Boughton Monchelsea	Boughton Lane, Loose and Boughton Monchelsea	7.10 ha
	Boughton Mount, Boughton Monchelsea	2.80
	Lyewood Farm, Boughton Monchelsea	2.00

Table 2: Proposed strategic open space allocations

- 4.2 Given the strategic nature of open space provision at this scale, it is appropriate to consider the cumulative provision by broad development area. Table 3 below therefore combines the proposed allocation by area, and compares this with the overall requirements identified in Table 1 to identify where there are any residual unmet needs.

Area	Open space (ha) required to meet agreed standard	Open space provided through allocations (ha)	Residual need (ha)
North west	18.05	11.50	6.55
South east	45.28	32.00	13.28 ³
Harrietsham	3.85	5.89 ⁴	0.00
Lenham	25.98	0.00	25.98 ⁵
Marden	7.00	3.20	3.80
Staplehurst	11.08	16.68	0.00
Headcorn	5.90	3.90	2.00
Coxheath	7.67	2.34	5.33

² Subject to site being agreed for inclusion in the local plan for consultation (Regulation 18)

³ Will depend on which option is agreed by Committee in respect of H1(10) South of Sutton Road

⁴ Includes 3.3 ha at Tongs Meadow in addition to the total in Appendix 2

⁵ To be identified through future master plan for the wider Lenham broad location

Yalding	4.13	26.20	0.00
Boughton Monchelsea	2.98	11.90	0.00
Eythorne Street	0.61	0.00	0.61 ⁶
Sutton Valence	0.62	0.00	0.62 ⁷

Table 3: Open space allocations and residual need by area

- 4.3 Table 3 therefore demonstrates that the proposed allocations for strategic open space provision at Harrietsham, Staplehurst, Yalding and Boughton Monchelsea would meet, and in fact could exceed, the identified requirements.
- 4.4 For areas where there is a residual need after the allocations are deducted, including those where the requirements are below the threshold for a strategic allocation, the application of the open space standards agreed for Policy DM11 can be expected to meet some or all of any shortfall through provision either on or off site. For instance, sites H1 (7) and (8) would together generate a requirement for some 9.8ha of natural and semi-natural open space, and this would reduce the residual need for south east Maidstone from 13.28ha to 3.48ha. Elsewhere, site H1 (61) has delivered some 2.3ha of open space, following negotiations with the developer.
- 4.5 In addition to open space provided through the application of the standards in the development management process, it is likely that some of the borough's Neighbourhood Plans will look to identify areas of open space which can make effective contributions in the local area. As part of the call for open space process to take place alongside consultation on this policy, Parish Councils and other stakeholders will be invited to submit any potential sites for consideration.
- 4.6 Local conditions and circumstances can affect how open space may be provided, and more detailed analysis at the planning application stage will indicate specific constraints and opportunities for each location. In cases where suitable open space provision cannot be secured, financial contributions would be sought in accordance with Policy DM11 to ensure the quality of existing facilities can be appropriately enhanced.
- 4.7 To ensure the council adopts a positive approach to meeting open space requirements, it is proposed to seek the promotion of potential additional sites for open space through the public consultation process, and to review any submissions along with other consultation responses prior to the completion of the next iteration of the local plan. The Committee is recommended to agree this approach for the seeking out of additional potential open space sites for inclusion through the Regulation 18 public consultation.
- 4.8 For the reasons set out in this report the Committee is recommended to approve the following draft policy and supporting text for inclusion in the draft

⁶ Shortfall below threshold for a strategic allocation

⁷ Shortfall below threshold for a strategic allocation

Maidstone Borough Local Plan in respect of open space provision, to be the subject of public consultation under Regulation 18.

Policy OS1 - Strategic open space allocations

- 4.9 To support the appropriate delivery of the key strategic locations identified for growth in the local plan, the council has identified suitable sites to secure the provision of strategic natural and semi-natural open space to meet and/or contribute towards the open space standards set out in Policy DM11.**

Policy OS1		
Strategic open space allocations		
The following sites, as shown on the policies map, are identified for provision of strategic natural and/or semi-natural open space to complement the growth identified in the key settlements.		
Policy reference	Site name, address	Approx. ha of strategic open space
(1)	East of Hermitage Lane, Maidstone	10.00
(2)	Oakapple Lane, Barming	1.50
(3)	Langley Park, Sutton Road, Boughton Monchelsea	5.00
(4)	Bicknor Farm, Sutton Road, Otham	16.00
(5)	South of Sutton Road, Langley	11.00
(6)	South of Ashford Road, Harrietsham	1.37
(7)	Church Road, Harrietsham	1.22
(8)	Tongs Meadow, West Street, Harrietsham	3.30
(9)	The Parsonage, Goudhurst Road, Marden	3.20
(10)	Hen & Duckhurst Farm, Marden Road, Staplehurst	4.66
(11)	Fishers Farm, Fishers Road, Staplehurst	6.24
(12)	North of Henhurst Farm, Staplehurst	5.78
(13)	Ulcombe Road and Mill Bank, Headcorn	1.50
(14)	South of Grigg Lane, Headcorn	2.40
(15)	North of Heath Road (Older's Field), Coxheath	2.34
(16)	Former Syngenta Works, Hampstead Lane, Yalding	26.20
(17)	Boughton Lane, Loose and Boughton Monchelsea	7.10
(18)	Boughton Mount, Boughton Monchelsea	2.80
(19)	Lyewood Farm, Boughton Monchelsea	2.00

Resultant amendments to policy DM11 for open space and recreation

- 4.12 All site allocations will be expected to deliver open space in accordance with draft policy DM11 that sets the standards for provision. Following the assessment of strategic natural and semi-natural open space requirements generated by the identified housing growth, it is clear that some housing site allocations can deliver such large areas of open space without compromising the yield, but others will find it difficult. There is a clear need to introduce a sequential approach towards securing the various typologies of open space. Consequently, the following amendments are recommended to draft policy DM11, which was approved by the Committee on 14 July 2015 for further Regulation 18 consultation. Further additions are in **bold text** and deletions in ~~strike through text~~.

Policy DM11 – Open space and recreation

- 4.13 High quality, publicly accessible open space can bring about opportunities for promoting social interaction and inclusion in communities. Sports and recreation areas and facilities can contribute positively to the wellbeing and quality of those communities. Open space can also have a positive impact upon the quality of the built environment and can be of ecological value. The National Planning Policy Framework encourages the provision and retention of high quality open spaces, a stance that the council supports.
- 4.14 The council will seek to secure publicly accessible open space provision for new housing and mixed use development sites, in accordance with standards [to be defined] in the green and blue infrastructure supplementary planning document quantity, quality and accessibility standards set out in Policy DM11.
- 4.15 **The preference is for** new major developments ~~will be required~~ to meet their ~~obligations for~~ open space **requirements** on site or on adjacent sites that have been allocated in association with the housing development. This recognises the demand for additional sports and recreation facilities to meet the needs of a growing population. **Alternatively** off-site provision in an accessible location will be acceptable if provision on-site is demonstrated to be **inappropriate** ~~undeliverable~~ for reasons of site constraints, **housing delivery expectations on allocated sites** or location.
- ~~4.16 If a development is too small to deliver new open space provision on site, then an alternative contribution will be sought in lieu of new provision to improve existing sites and enhance the capacity of existing provision. Priorities for improvement will be set out in the Action Plan to the Green and Blue Infrastructure Strategy.~~
- 4.17 **A financial contribution towards open space provision will be sought in lieu of new provision to improve existing sites and enhance the capacity of existing provision if:**
- a) Suitable opportunities for new open space cannot be identified within the specified accessibility standards, or**

b) A development is demonstrated to the satisfaction of the council to be too small to deliver new open space provision on site.

In such cases the council will seek to secure high quality, significant structural landscaping to compensate for the non-provision of open space and ensure a high quality environment is secured for future residents. Priorities for the improvement to existing spaces will be set out in the Action Plan to the Green and Blue Infrastructure Strategy.

- 4.18 The council will produce an Open Space Supplementary Planning Document to provide further detail to support the policy, including qualitative open space standards.
- 4.19 It is important to ensure that any new publicly accessible open space and sports provision preserves the quality of life for existing residents, as well as the visual amenity of the locality. Intense sports uses, such as multi use games areas, can generate significant amounts of noise; while sports and other recreation uses may include lighting, such as floodlighting. This can be harmful to the living environment of nearby occupiers and to the visual amenity of the countryside where levels of artificial lighting are generally very limited. The council will seek to ensure that new publicly accessible open space and recreation areas are appropriate to their setting in these regards.
- 4.20 Provision of open space should be an integral part of design and layout of development, and should be sited to make a contribution to biodiversity networks. The Green and Blue Infrastructure Strategy will set out the aims and objectives for the provision and enhancement of green space in the Borough over the period of the plan.
- 4.21 The council will expect future management and maintenance of new open spaces to be **appropriately secured to the satisfaction of the council.** ~~delivered by means of a private limited management company or trust. However, where appropriate, the Council will seek to enter into an agreement with the developer for the future management and maintenance of the open space provision.~~
- 4.22 The loss of existing open space, sport and recreation facilities will be resisted, unless there is a proven overriding need for the development and there would be no resulting deficiency, or net loss, of such space/facilities in the locality. In considering the impact of the loss of open space, the council will have regard to the visual amenity and biodiversity value of the land in question.
-

Policy DM11

Publicly accessible open space and recreation

1. For new housing or mixed use development sites, the council will seek to deliver the following categories of publicly accessible open space provision in accordance with the specified standards

(i) Quantity standards

Open Space Type	Draft Standard (ha/1000 population)	Minimum Size of Facility (hectares)
Amenity Green Space	0.7	0.1
Provision for children and young people	0.25	0.25 excluding a buffer zone*
Publicly accessible outdoor sports	1.6	To meet the technical standards produced by Sport England or the relevant Governing Bodies of Sport
Allotments and community gardens	0.2	0.66
Natural/semi-natural areas of open space	6.5	0.2

* but in cases where accessibility to children's and young people's provision is poor, for example outside a reasonable walking distance or where the crossing of major roads is necessary, smaller areas of open space may be justified on-site.

(ii) Quality Standards

All new open spaces must take account of design and accessibility and other quality requirements specific to each open space type set out in the Open Space SPD. An Open Space Layout and Design statement, to incorporate ecological management measures, should be submitted for approval by the council.

(iii) Accessibility Standards

If open space cannot be provided in full on development sites, due to site constraints, housing delivery expectations on allocated sites, or location, then provision should be provided off-site where it is within the distance from the development site identified in the accessibility standard.

Open Space Type	Draft Accessibility Standard (radius from open space)
Amenity Green Space	400m
Provision for children and young	600m

people provision	
Publicly accessible outdoor sports	1000m
Allotments and community gardens	1000m
Natural/semi-natural areas of open space	300m (2 Ha site) 2km (20 Ha site) 5km (100 Ha site) 10km (500 Ha site)

2. A financial contribution in lieu of open space provision will be acceptable, provided:
 - (i) The proposed development site would be of insufficient size in itself to make the appropriate new provision; **or**
 - (ii) The open space cannot be accommodated on site due to site constraints, **housing delivery expectations on allocated sites or location**, and alternative appropriate off-site provision cannot be identified.
3. **Where it can be demonstrated that existing open space provision can either wholly or partially mitigate the impacts of development in accordance with the above standards, the Council may seek a reduced contribution.**
4. Proposals for, and including, new publicly accessible open space and recreation will, where feasible, seek to reinforce existing landscape character, as defined in the Maidstone Landscape Character Assessment.
5. Proposals for, and including, new publicly accessible open space and recreation provision shall respect the amenities of neighbouring occupiers, by ensuring that development does not result in excessive levels of noise or light pollution. New lighting relating to such development will also preserve the character and visual amenity of the countryside.
6. Proposals for new development which would result in the net loss of open space or sport and recreation facilities will not be permitted unless there is a proven overriding need for the development. In addition, the development will only be permitted if:
 - (i) There is no resulting deficiency in open space or recreation facilities in the locality; **or**
 - (ii) An alternative provision, determined to be of an equivalent community benefit by officers of the council and community representatives can be provided to replace the loss.

7. In dealing with applications to develop existing open areas within the urban area, rural service centres, larger villages and other locations, the Borough Council will have regard to the impact of the loss of the contribution that the existing site makes to the character, amenity and biodiversity of the area.

The Open Space supplementary planning document will contain further detail on how the policy will be implemented.

5. CONSULTATION RESULTS AND PREVIOUS COMMITTEE FEEDBACK

- 5.1 A number of the sites identified for the provision of open space and listed in the draft policy OS1 above have been the subject of public consultation for the associated delivery of housing. There has not yet been any consultation on the formal identification of open space as shown on the site plans at Appendix 3.
- 5.2 All of the identified allocations in the draft policy will be subject to a public consultation under Regulation 18, during which time the council will invite submissions for potential additional land for allocation through consultation responses.

6. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION

- 6.1 The approved policy and allocations will be included in the next public consultation under Regulation 18 planned for September and October 2015.

7. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
Impact on Corporate Priorities	Once adopted the local plan will assist in the identified priorities Keeping Maidstone borough an attractive place for all, and securing a successful economy for Maidstone borough, and will support all of the action areas that support the priorities and mission of the council	Head of Planning and Development
Risk Management	There are small risks associated with taking the plan forward with an unmet need for open space, but this is not expected to result in the plan being found unsound.	Head of Planning and Development
Financial	There are no direct financial implications arising from this report. The local plan work is fully funded with regular budget	Section 151 Officer &

	reviews. Indirectly there may be future cost implications regarding the on-going revenue costs of maintaining any public open space if this is subsequently taken on by the council as opposed a trust or community organisation. Initial costs may be secured through developer contributions, although this will be a matter for negotiation and will be a finite sum.	Finance Team
Staffing	None	Head of Planning and Development
Legal	Any representations made as a result of the proposed consultation on the report contents will need to be considered as required by the Town & Country Planning (Local Planning) (England) Regulations 2012.	Kate Jardine, Mid Kent Legal Services, Team Leader (Planning)
Equality Impact Needs Assessment	N/A	Policy & Information Manager
Environmental/Sustainable Development	Delivering significant allocations of natural and semi-natural open space assist in mitigating the impacts of development on the environment.	Head of Planning and Development
Community Safety	N/A	Head of Planning and Development
Human Rights Act	N/A	Head of Planning and Development
Procurement	N/A	Head of Planning and Development and Section 151 Officer
Asset Management	N/A	Head of Planning and Development

8. REPORT APPENDICES

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

- Appendix 1: Detailed breakdown by proposed site of open space requirements derived by application of agreed open space standards.
- Appendix 2: Detailed breakdown of open space delivered by housing site allocations.

- Appendix 3: Proposed open Space Allocations - site plans
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9. BACKGROUND PAPERS

There are none.

Appendix 1:

Detailed breakdown by proposed site of open space requirements derived by application of agreed open space standards.

Area	Site Ref.	Site Name	Units	Projected Population	Ha required
North west	H1(1)	Bridge Nursery	140	336	2.18
	H1(2)	East Hermitage Lane	500	1200	7.80
	H1(3)	West Hermitage Lane	330	792	5.15
	H1(4)	Oakapple Lane	187	449	2.92
Total			1157	2777	18.05

Area	Site Ref.	Site Name	Units	Projected Population	Ha required
South East	H1(5)	Langley Park, Sutton Road	600	1440	9.36
	H1(6)	North Sutton Road	286	686	4.46
	H1(7)	North Bicknor Wood	190	456	2.96
	H1(8)	West Church Road	440	1056	6.86
	H1(9)	Bicknor Farm	335	804	5.23
	H1(10)	South Sutton Road ¹	850	2040	13.26
	H1(21)	Kent Police HQ	112	269	1.75
	H1(22)	Kent Police training school	90	216	1.4
Total			2903	6967	45.28

¹ Subject to inclusion of site H1(10) for consultation at Reg.18 being agreed

Area	Site Ref.	Site Name	Units	Projected Population	Ha required
Harrietsham	H1(26)	South Ashford Road	117	281	1.82
	H1(27)	Mayfield Nursery	50	120	0.78
	H1(28)	Church Road	80	192	1.25
Total			247	593	3.85

Area	Site Ref.	Site Name	Units	Projected Population	Ha required
Lenham	H1(29)	Tanyard Farm	155	372	2.42
	H1(30)	Glebe Gardens	10	24	0.16
	H3 Broad Location ²	N/A	1500	3600	23.40
Total			1665	3996	25.98

Area	Site Ref.	Site Name	Units	Projected Population	Ha required
Marden	H1(32)	Howland Road	44	106	0.69
	H1(33)	Stanley Farm	85	204	1.33
	H1(34)	The Parsonage	144	346	2.25
	H1(35)	Marden Cricket & Hockey Club	125	300	1.95
	H1(66)	South of The Parsonage	50	120	0.78
Total			448	1076	7.00

Area	Site Ref.	Site Name	Units	Projected Population	Ha required
Staplehurst	H1(36)	Hen & Duckhurst Farm	250	600	3.90
	H1(37)	Fishers Farm	400	960	6.24
	H1(68)	North of Henhurst Farm	60	144	0.94
Total			710	1704	11.08

² Strategic broad location currently identified for 1500 dwellings in the latter period of the plan 2026-31

Area	Site Ref.	Site Name	Units	Projected Population	Ha required
Headcorn	H1(38)	Old School Nursery	5	12	0.08
	H1(39)	Ulcombe Road & Mill Bank	220	528	3.43
	H1(40)	Grigg Lane & Lenham Road	45	108	0.70
	H1(41)	South of Grigg Lane	55	132	0.86
	H1(42)	Knaves Acre	5	12	0.08
	H1(65)	Lenham Road	48	115	0.75
Total			378	907	5.90

Area	Site Ref.	Site Name	Units	Projected Population	Ha required
Coxheath	H1(43)	Linden Farm	40	96	0.62
	H1(44)	Heathfield Road	130	312	2.03
	H1(45)	Forstal Lane	195	468	3.04
	H1(75)	Older's Field	55	132	0.86
	RMX1(4)	Clockhouse Farm	72	173	1.12
Total			492	1181	7.67

Area	Site Ref.	Site Name	Units	Projected Population	Ha required
Yalding	H1(46)	Vicarage Road	65	156	1.01
	RMX1(5)	Syngenta	200	480	3.12
Total			265	636	4.13

Area	Site Ref.	Site Name	Units	Projected Population	Ha required
Boughton Monchelsea	H1(47)	Hubbards Lane & Haste Hill Road	20	48	0.31
	H1(62)	Boughton Lane, Loose	75	180	1.17
	H1(63)	Boughton Mount	25	60	0.39
	H1(70)	Church Street / Heath Road	40	96	0.62
	H1(71)	Lyewood Farm	25	60	0.39

	HO3(220)	Hubbards Lane	6	15	0.10
Total			191	459	2.98

Area	Site Ref.	Site Name	Units	Projected Population	Ha required
Eythorne Street	H1(49)	East Eythorne Street	10	24	0.16
	H1(50)	West Eythorne Street	14	34	0.22
	H1(72)	Land adj. The Windmill	15	36	0.23
Total			39	94	0.61

Area	Site Ref.	Site Name	Units	Projected Population	Ha required
Sutton Valence	H1(73)	Brandy's Bay	40	96	0.62
Total			40	96	0.62

Assumptions: densities as per draft Local Plan policies for allocated sites
2.4 person per household; 1 unit per household

Appendix 2:

Detailed breakdown of open space delivered by housing site allocations.

Area	Site Ref.	Site Name	Ha delivered
North west	H1(1)	Bridge Nursery	0.00
	H1(2)	East Hermitage Lane	10.00
	H1(3)	West Hermitage Lane	0.00
	H1(4)	Oakapple Lane	1.50
Total			11.50

Area	Site Ref.	Site Name	Ha delivered
South East	H1(5)	Langley Park, Sutton Road	5.00
	H1(6)	North Sutton Road	0.00
	H1(7)	North Bicknor Wood	0.00
	H1(8)	West Church Road	0.00
	H1(9)	Bicknor Farm	16.00
	H1(10)	South Sutton Road ¹	11.00
	H1(21)	Kent Police HQ	0.00
	H1(22)	Kent Police training school	0.00
Total			32.00

Area	Site Ref.	Site Name	Ha delivered
Harrietsham	H1(26)	South Ashford Road	1.37
	H1(27)	Mayfield Nursery	0.00
	H1(28)	Church Road	1.22
Total			2.59

Area	Site Ref.	Site Name	Ha delivered
Lenham	H1(29)	Tanyard Farm	0.00
	H1(30)	Glebe Gardens	0.00
	H3 Broad Location ²	N/A	0.00
Total			0.00

¹ Subject to inclusion of site H1(10) for consultation at Reg.18 being agreed and which option is taken forward

² Strategic broad location currently identified for 1500 dwellings in the latter period of the plan 2026-31

Area	Site Ref.	Site Name	Ha delivered
Marden	H1(32)	Howland Road	0.00
	H1(33)	Stanley Farm	0.00
	H1(34)	The Parsonage	3.20
	H1(35)	Marden Cricket & Hockey Club	0.00
	H1(66)	South of The Parsonage	0.00
Total			3.20

Area	Site Ref.	Site Name	Ha delivered
Staplehurst	H1(36)	Hen & Duckhurst Farm	4.66
	H1(37)	Fishers Farm ³	6.24
	H1(68)	North of Henhurst Farm	5.78
Total			16.68

Area	Site Ref.	Site Name	Ha delivered
Headcorn	H1(38)	Old School Nursery	0.00
	H1(39)	Ulcombe Road & Mill Bank	1.50
	H1(40)	Grigg Lane & Lenham Road	0.00
	H1(41)	South of Grigg Lane	2.40
	H1(42)	Knaves Acre	0.00
	H1(65)	Lenham Road	0.00
Total			3.90

Area	Site Ref.	Site Name	Ha delivered
Coxheath	H1(43)	Linden Farm	0.00
	H1(44)	Heathfield Road	0.00
	H1(45)	Forstal Lane	0.00
	H1(75)	Older's Field	2.34
	RMX1(4)	Clockhouse Farm	0.00
Total			2.34

Area	Site Ref.	Site Name	Ha delivered
Yalding	H1(46)	Vicarage Road	0.00
	RMX1(5)	Syngenta	26.20
Total			26.20

³ Exact location of open space to be determined through future planning application

Area	Site Ref.	Site Name	Ha delivered
Boughton Monchelsea	H1(47)	Hubbards Lane & Haste Hill Road	0.00
	H1(62)	Boughton Lane, Loose	7.10
	H1(63)	Boughton Mount	2.80
	H1(70)	Church Street / Heath Road	0.00
	H1(71)	Lyewood Farm	2.00
	HO3(220)	Hubbards Lane	0.00
Total			11.90

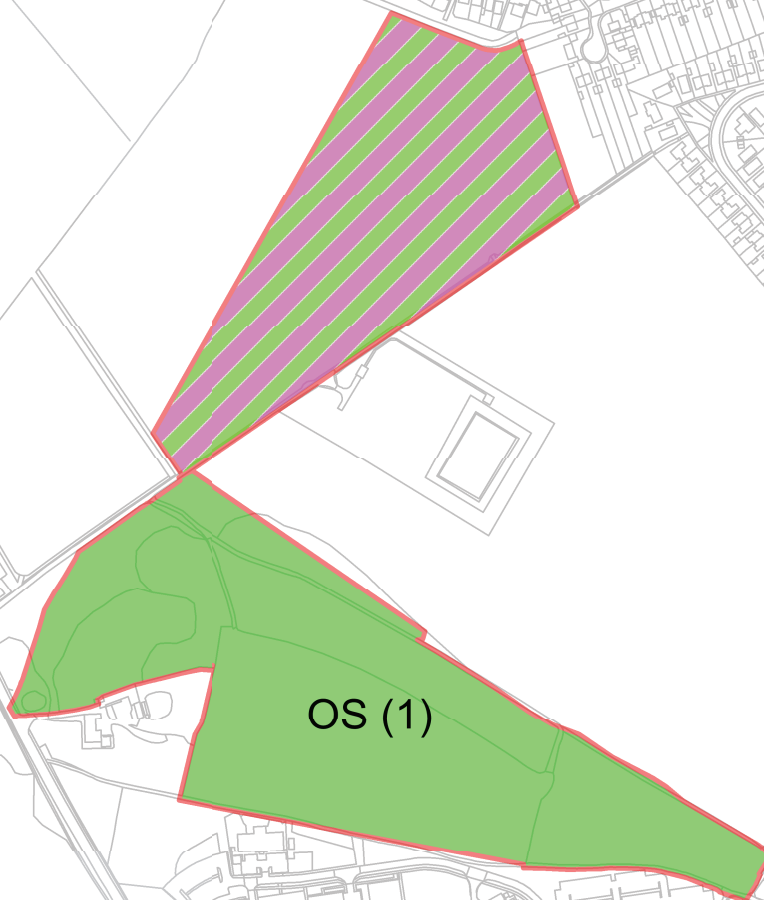
Area	Site Ref.	Site Name	Ha delivered
Eyhorne Street	H1(49)	East Eyhorne Street	0.00
	H1(50)	West Eyhorne Street	0.00
	H1(72)	Land adj. The Windmill	0.00
Total			0.00

Area	Site Ref.	Site Name	Ha delivered
Sutton Valence	H1(73)	Brandy's Bay	0.00
Total			0.00

Appendix 3: Proposed Open Space Allocations - site plans

EAST OF HERMITAGE LANE, MAIDSTONE

- COMMUNITY INFRASTRUCTURE / OPEN SPACE
- OPEN SPACE / LANDSCAPING



OAKAPPLE LANE, BARMING

 OPEN SPACE / LANDSCAPING

OS (2)



LANGLEY PARK, SUTTON ROAD, BOUGHTON MONCHELSEA



OPEN SPACE / LANDSCAPING

OS (3)



BICKNOR FARM, SUTTON ROAD, OTHAM



OPEN SPACE / LANDSCAPING

OS (4)

OS (4)



SOUTH OF SUTTON ROAD, LANGLEY



COMMUNITY INFRASTRUCTURE / OPEN SPACE

OPEN SPACE / LANDSCAPING

OS (5)

OS (5)

OS (5)



SOUTH OF ASHFORD ROAD, HARRIETSHAM

 OPEN SPACE / LANDSCAPING

OS (6)



CHURCH ROAD, HARRIETSHAM



OPEN SPACE / LANDSCAPING

OS (7)



TONGS MEADOW, WEST STREET, HARRIETSHAM



OPEN SPACE / LANDSCAPING

OS (8)



THE PARSONAGE, GOUDHURST ROAD, MARDEN

 OPEN SPACE / LANDSCAPING

OS (9)



HEN & DUCKHURST FARM, MARDEN ROAD, STAPLEHURST



OPEN SPACE / LANDSCAPING

OS (10)

OS (10)



FISHERS FARM, FISHERS ROAD, STAPLEHURST



Exact Location of Open Space / Landscape to be determined in conjunction with development

OS (11)



NORTH OF HENHURST FARM, STAPLEHURST

 OPEN SPACE / LANDSCAPING

OS (12)



ULCOMBE ROAD AND MILL BANK, HEADCORN



OPEN SPACE / LANDSCAPING

OS (13)

OS (13)



SOUTH OF GRIGG LANE, HEADCORN

 OPEN SPACE / LANDSCAPING

OS (14)



NORTH OF HEATH ROAD, COXHEATH (OLDER'S FIELD)



OPEN SPACE / LANDSCAPING

OS (15)



FORMER SYNGENTA WORKS, HAMPSTED LANE, YALDING

OPEN SPACE / LANDSCAPING

OS (16)



BOUGHTON LANE, LOOSE AND BOUGHTON MONCHELSEA



OPEN SPACE / LANDSCAPING

OS (17)



BOUGHTON MOUNT, BOUGHTON LANE, BOUGHTON MONCHELSEA

 OPEN SPACE / LANDSCAPING

OS (18)



LYEWOOD FARM, GREEN LANE, BOUGHTON MONCHELSEA

 OPEN SPACE / LANDSCAPING

OS (19)

