

**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**



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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



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Enc.

cc: All SPS&T Committee Members  
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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 PROPOSALS 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

