

# APPENDIX ONE



## DM13 SUSTAINABLE TRANSPORT

### Consultation issues and responses

#### Policy: DM13 Sustainable transport

##### Key issues:

1. Maidstone needs High Speed railway station.
2. Roads at capacity, Leeds/Langley bypass needed.
3. General disagreement with approach.
4. Better bus service in rural areas/to and from Weald required.
5. Policy is too aspirational.
6. Travel through Maidstone town centre if travelling north-south and vice-versa is a big problem.
7. Targets for modal split and journey times should be included.
8. Integrated Transport Strategy not supported by KCC.
9. Impact of development on A26 should be referenced.
10. Policy is unclear.
11. Rapid transit system required e.g. monorail.
12. Bus lanes/bus priority measures take road space from other modes.
13. Support SPD on parking standards, particularly for RSCs. Currently provision standards too low – need to be realistic.
14. Use of Willington Street needs to be reduced, where are the measures for this?
15. Plan is not yet based on the transport evidence.
16. B2163 should be upgraded into a southern bypass.
17. More cycle routes required.
18. Linton Crossroads inappropriate location for park and ride – traffic, junction issues, landscape character, effect on Coxheath, Linton communities.
19. Bus frequency should be referenced in policy.
20. More car parking required in town centre.
21. Infrastructure should be provided before development.
22. Policy contrary to NPPF – with reference to residual development impacts being severe. Currently not worded this way. Air quality impacts need to be addressed proportionately, not as de facto requirement of all developments.
23. Transport infrastructure improvements required on A249 at Detling Aerodrome.
24. Policy parts 1 and 2 need to be reworded as these do not provide appropriate guidance for developers.
25. Employment strategy is at odds with transport strategy because it will require HGV movements through town centre – should make use of motorway junctions, specifically junction 8.

##### Key issue 1: Maidstone needs High Speed railway station.

Detail: The high speed railway line (HS1) runs through Maidstone Borough but does not have a station within the borough. Connections to London from Ashford on HS1 take 38 minutes throughout the day. The quickest connection to London from Maidstone takes 50 minutes at peak times from Maidstone West.

Officer response: Partially accept. In practice it is difficult for Maidstone to construct a station on the high speed line because of its route across and adjacent to the Kent Downs AONB. The Maidstone West peak hour service connects to the high speed line at Ebbsfleet, having travelled along the Medway Valley line and then the north Kent line through Strood and Gravesend. This offers the quickest service to London. Thameslink is due to be extended to

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Maidstone, which means that although speeds to London may not increase, the service options will.
Proposed change: No change.
<b>Key issue 2: Roads at capacity, Leeds/Langley bypass needed.</b>
Detail: The Leeds/Langley bypass is an adopted scheme in the Maidstone Borough-Wide Local Plan 2000. There have been a number of iterations of this scheme, whether adopted or not, in including a proposed South East Maidstone Strategic Link (SEMSL), but none have ever gained funding. It is contended that this road, if built, would take traffic away from the town centre.
Officer response: Partially accept. The Leeds/Langley bypass is being modelled as part of the transport modelling exercise required to mitigate transport issues in association with development proposed in the draft local plan. The modelling will indicate if this is an appropriate solution.
The capacity of roads in the borough is another question to be addressed through transport modelling, which may include such schemes as expanded park and ride, for which the Borough Council has been successful in part funding.
Proposed change: No change.
<b>Key issue 3: General disagreement with approach.</b>
Detail: General disagreement with approach.
Officer response: Noted.
Proposed change: No change.
<b>Key issue 4: Better bus service in rural areas/to and from Weald required.</b>
Detail: The issue of bus provision in rural areas continues to be difficult. Bus services are limited and do not run late into the night.
Officer response: Accept. This is an important issue that needs to be addressed. The Borough Council is limited in its options, however, when possibilities arise, it will look to exploit them.
Proposed change: Amend criterion 2(vi) to read:  "Develop the strategic and public transport links to and from Maidstone, including increased bus service frequency;"  Add new criterion 2(vii):  "Work with service providers to improve bus links to the rural service centres and larger villages, including route options and frequency;"
<b>Key issue 5: Policy is too aspirational.</b>
Detail: Policy is considered too aspirational i.e. the comment doubts that improvements to the level proposed can be achieved.
Officer response: Reject. Some aspects of the policy undoubtedly are aspirational, however, this indicates the way that the Borough Council is thinking and without aspirations set out in policy, it is difficult to envisage any changes being achieved.
Proposed change: No change.
<b>Key issue 6: Travel through Maidstone town centre if travelling north-south and vice-versa is a big problem.</b>
Detail: Travel to and through the town centre is very difficult because a lot of the traffic converges on the Bridges Gyratory. This includes the A20 east and west, the A229 north and

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south, the A26 and the A249.
Officer response: Accept: The council, in conjunction with Kent County Council, has won funding from the Local Growth Fund to improve some of the movements via the Bridges Gyratory. There will now be an option for traffic coming from the south on the A229 to bypass the Bridges Gyratory and travel north without having to twice cross the River Medway. This means in effect that as well as traffic movements south to north being improved, there will be more space on the gyratory itself, easing other movements i.e. east-west and vice-versa.
Proposed change: No change.
<b>Key issue 7: Targets for modal split and journey times should be included.</b>
Detail: Modal split is an issue that many highways authorities are dealing with. Influencing people to travel by means other than private transport helps to reduce congestion and carbon emissions.
Officer response: Partially accept. Maidstone Borough Council and Kent County Council will prepare an integrated transport strategy, for consultation alongside the regulation 19 draft of the local plan. It is not until then that the two councils will be able to say with certainty what are realistic targets to aim for in achieving modal split. However, adopting a target will be an important aspect of the policy.
Proposed change: No change.
<b>Key issue 8: Integrated Transport Strategy not supported by KCC.</b>
Detail: The previous draft of the integrated transport strategy was rejected by members of the Joint Transportation Board (JTB), which includes Kent County Council and Maidstone Borough Council members.
Officer response: Accept. The integrated transport strategy, in its previous incarnation, was rejected by members sitting on the JTB. Members from both councils are now working together, including through transport modelling, to seek joint solutions for the transport issues in Maidstone Borough.
Proposed change: No change.
<b>Key issue 9: Impact of development on A26 should be referenced.</b>
Detail: The A26 will be subject to a number of transport impacts resulting from the development proposed in the local plan. The north west area of Maidstone, in particular at Hermitage Lane, has been identified as a strategic housing location in the plan.
Officer response: Partially accept. Transport impacts will result from a number of proposed developments in the local plan, including along the primary transport corridors into and out of town – the A26, the A229, the A249, the A20 and the A274. However, this wider picture will be considered as part of the joint work being undertaken to develop the integrated transport strategy. The policy in its current form does not specify particular transport corridors, therefore at this moment in time, and until at least the transport modelling and integrated transport strategy have been completed, no further detail in this respect should be added.
Proposed change: No change.
<b>Key issue 10: Policy is unclear.</b>
Detail: Comment considers policy unclear.
Officer response: Noted.
Proposed change: No change.
<b>Key issue 11: Rapid transit system required e.g. monorail.</b>
Detail: Rapid transit systems are found in major cities around the world and in larger cities across England. In Sheffield, Nottingham, Manchester and Edinburgh there are tram systems. In Newcastle and Glasgow there are metro systems and in London there is the Underground.

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Many tram systems used to exist across the country but were replaced when cars became more popular and affordable.
Officer response: Reject. Rapid transit systems can move large numbers of people in relative ease. In the 1990s the Government indicated that it was willing to fund the reinstatement of a number of light rail (tram) systems. The Maidstone Borough-Wide Local Plan 2000 included a policy for the establishment of a light rail service between Maidstone and Strood, using the Medway Valley railway line. A re-evaluation of re-establishing tram services meant, however, that Government funding was restricted and since then the business cases for such schemes are scrutinised more stringently. In Maidstone it would be difficult to seek the establishment of a rapid transit system – tram or monorail, because the population does not exist in the urban area to make it viable. It is difficult to establish priority measures for buses and a tram system would require much more of these.
Proposed change: No change.
<b>Key issue 12:</b> Bus lanes/bus priority measures take road space from other modes.
Detail: Concern regarding the implementation of any bus priority measures, including a bus lane.
Officer response: Reject. Depending on the measure sought, bus priority schemes can take road space from other road users. The benefit of any bus priority measures that are proposed will be evidenced by transport modelling. This will ensure that the costs and benefits of any proposal are weighed up adequately.
Proposed change: No change.
<b>Key issue 13:</b> Support SPD on parking standards, particularly for RSCs. Currently provision standards too low – need to be realistic.
Detail: Considers that parking standards are currently too low. This is particularly the case in RSCs where alternative transport modes to the car are not as comprehensive as in the urban area.
Officer response: Accept. Parking standards are an issue that will be addressed through an SPD. Any proposals contained in the parking standards will be based on evidence and take into account the wider transport context of any particular location.
Proposed change: No change.
<b>Key issue 14:</b> Use of Willington Street needs to be reduced, where are the measures for this?
Detail: Willington Street provides an effective bypass to the east of Maidstone town centre, linking the A274 to the A20.
Officer response: Accept. Transport modelling is underway to assess the options for mitigating the impact of transport measures proposed in the draft local plan. One of the schemes that will be modelled is the Leeds/Langley bypass, which if eventually constructed would ease the use of Willington Street.
Proposed change: No change.
<b>Key issue 15:</b> Plan is not yet based on the transport evidence.
Detail: Comment considers that no evidence has been produced to support the transport measures proposed in the local plan.
Officer response: Reject. A number of rounds of transport modelling have been undertaken to support the development of the local plan. The most recent was in support of the 2012 Core Strategy Strategic Site Allocations document. A large part of this work remains valid.
The site allocations proposed in the draft Maidstone Borough Local Plan mean that more

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transport modelling is required and as a result, further transport modelling is currently being undertaken.
Proposed change: No change.
<b>Key issue 16:</b> B2163 should be upgraded into a southern bypass.
Detail: The B2163 runs from Leeds near to junction 8 of the M20, through Boughton Monchelsea and Coxheath, to Teston on the A26. This is a minor road, although people do use what of it they can as an effective southern bypass around Maidstone.
Officer response: Reject. This has been proposed in past years, however, a mixture of issues has meant that it has never been delivered i.e. agreement whether this an appropriate solution and funding.
Even if funding were available, it would have to be born in mind that upgrading the B2163 into a southern bypass would irreversibly alter the rural character of the areas that it runs through.
Proposed change: No change.
<b>Key issue 17:</b> More cycle routes required.
Detail: As part of the aim to encourage modal shift, including to bicycles, more cycle routes will be required.
Officer response: Accept. A large amount of work has already been undertaken on this subject and a cycle strategy will be developed as part of the integrated transport strategy and this will be published alongside the Maidstone Borough Local Plan regulation 19 draft in July 2015. This will include options for the future of cycling in Maidstone, including the potential for creating more cycle routes.
Proposed change: No change.
<b>Key issue 18:</b> Linton Crossroads inappropriate location for park and ride – traffic, junction issues, landscape character, effect on Coxheath, Linton communities.
Detail: Linton crossroads should not be identified as a park and ride site.
Officer response: Reject. This comment is more appropriately related to policy DM15 – Park and ride. However, the basis for the park and ride site being proposed at Linton Crossroads is that transport modelling undertaken in support of the 2012 Core Strategy Strategic Site Allocations document showed the A229 corridor from the south of Maidstone to have the strongest demand.
Proposed change: No change
<b>Key issue 19:</b> Bus frequency should be referenced in policy.
Detail: Bus frequency is an issue when trying to encourage people to use public transport instead of private transport. One of the benefits of private transport is the ability to travel when required i.e. 'turn up and go', rather than having to wait for a service. In places like London, the high frequency of public transport means that as an option it rates very highly in comparison.
Officer response: Accept. Modal shift requires an element of carrot and stick. If the incentives for people to travel on public transport do not exist then restrictive measures will not work effectively and the council could actually be portrayed in a bad light.
Proposed change: Amend criterion 2(vi) to read:
"Develop the strategic and public transport links to and from Maidstone, including increased bus service frequency."
<b>Key issue 20:</b> More car parking required in town centre.

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Detail: More car parking is required in the town centre.
Officer response: Reject. Maidstone town centre benefits from a number of car parks, which are operated by different organisations, among them The Mall, Fremlin Walk and Maidstone Borough Council. There is a debate about the future of car parking in Maidstone, especially in relation to the traffic travelling into the town centre, however, it is difficult to say that the town centre is under-catered for.
Proposed change: No change.
<b>Key issue 21:</b> Infrastructure should be provided before development.
Detail: Often infrastructure can be delivered in line with development, or lagging behind development. This can cause issues when residents move into houses but essential services are not up to standard. In relation to transport, this might be where bus services are delivered to a development an amount time after it has been occupied and when the new residents' behaviour has become normalised driving their cars.
Officer response: Accept. Where possible infrastructure should be provided in advance of residents occupying new homes.
Proposed change: Amend criterion 3(i) to read:  "i. Demonstrate that the impacts of trips generated to and from the development are remedied or mitigated, including where feasible an exploration of delivering mitigation measures ahead of the development being occupied;"
<b>Key issue 22:</b> Policy contrary to NPPF – with reference to residual development impacts being severe. Currently not worded this way. Air quality impacts need to be addressed proportionately, not as de facto requirement of all developments.
Detail: The impact on air quality is a key consideration in allocating land for new developments and in determining planning applications. The concern raised by this comment is how that impact is dealt with and who is liable for it.
Officer response: Reject. Policy DM13 does not specify the extent to which air quality impacts are addressed. Policy DM16 – Air quality, more comprehensively addresses the topic and should be referred to in the first instance.
Proposed change: Amend criterion 3(iii) to read:  "Demonstrate that development in, or likely to adversely affect, Air Quality Management Areas incorporates mitigation measures to reduce impact to an acceptable level, in line with the borough's air quality action plan."
<b>Key issue 23:</b> Transport infrastructure improvements required on A249 at Detling Aerodrome.
Detail: Transport infrastructure i.e. a roundabout, should be included on the A249 at Detling Aerodrome, in conjunction with redevelopment and expansion of the existing business park.
Officer response: Reject. Detling Aerodrome was not included in the allocations policy for further development. As long as this is the case, no transport improvements would be required in relation to the aerodrome.
Proposed change: No change.
<b>Key issue 24:</b> Policy parts 1 and 2 need to be reworded as these do not provide appropriate guidance for developers.
Detail: The strategic aspect of this policy needs to be reworded as this is not true development management guidance.
Officer response: Partially accept. The structure of the local plan has been developed as such



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to be less topic based and more about place shaping. Therefore a number of topics have been included under the umbrella of 'development management', which is opposed to the structure of the Maidstone Borough-Wide Local Plan 2000. Inevitably this does not deal neatly with all aspects of policy and is the reason why policy DM13 includes strategy as well as more specific development management requirements [at criterion 3].
The structure of the plan is such that this is a necessary compromise.
Proposed change: No change.
<b>Key issue 25:</b> Employment strategy is at odds with transport strategy because it will require HGV movements through town centre – should make use of motorway junctions, specifically junction 8.
Detail: By allocating land at the motorway junctions, the council could restrict traffic movements through the town centre.
Officer response: Partially accept. While not accepting that this in itself means land should be allocated at motorway junctions for employment uses, there is a point to take regarding transport issues in the town centre not necessarily indicating that dispersed employment allocations are the best solution.
It is worthwhile noting that in Maidstone Borough and at the motorway junctions specifically, there are already a number of employment uses/approval for employment uses. At junction 6 the Audi dealership has been built and there is approval for distribution development at Brooklyn Yard. At junction 7 the Eclipse business park is still developing, including a local planning agent, a law firm, an insurance firm, a retail use and an approval for a new hotel. On the opposite side of the A249 the KIMS hospital has been built and the wider Maidstone Medical Campus has approval to expand on this. There is also an allocation to redevelop the Newnham Court shopping village with limited expansion. It is only at junction 8 where further land could feasibly be allocated in line with the comments expressed. It could be argued therefore that the council has already taken heed of such arguments regarding the use of motorway junctions.
The transport modelling currently being undertaken is considering the possibility of a Leeds/Langley bypass and this, if eventually delivered, could take some commercial traffic away from the town centre.
Proposed change: No change.

## **DM13 SUSTAINABLE TRANSPORT**

Proposed policy following amendments

### **Policy DM 13 – Sustainable transport**

- Additions and amendments
  - — Deletions
- 

#### **Transport**

**11.59** Working in partnership with Kent County Council (the local transport authority), the Highways Agency, infrastructure providers and public transport operators, the council will facilitate the delivery of transport improvements to support the growth proposed by the local plan. An Integrated Transport Strategy (ITS), prepared by the council and its partners, will have the aim of facilitating economic prosperity and improving accessibility across the borough and to the town centre, in order to promote Maidstone as a regionally important transport hub. The ITS needs to address a number of transport challenges as set out below.

#### **Highway network**

**11.60** Maidstone borough has an extensive highway network which provides direct links both within the borough and to neighbouring areas including Ashford, Tonbridge and Malling, the Medway Towns, Tunbridge Wells and London. Four north-south and east-west primary routes pass through the town centre and numerous secondary routes run in concentric rings around the town, providing local links to the rural parts of the borough. Maidstone also enjoys good connections to the motorway network, including direct access to four junctions of the M20.

**11.61** The principal constraint on the borough's urban road network is the single crossing point of the River Medway at the town centre bridges gyratory, where the A20, A26 and A229 meet. From this point, congestion spreads along the main radial approaches to Maidstone during the morning and evening peaks, leading drivers to seek alternative routes for longer journeys around the periphery of the town.

**11.62** Modelling conducted in 2012 indicates that by 2026, a combination of background traffic growth and planned housing and employment development will increase the number of person trips in Maidstone during the morning peak hour by 42%. Significantly however, background growth associated with increased economic activity and greater car ownership is expected to have over one-and-a-half times the impact on trip generation of new housing and employment, demonstrating that robust solutions to Maidstone's transport challenges are required regardless of the development proposed in the local plan.

**11.63** Maidstone has an average vehicle occupancy of approximately 1.23 persons per car, which is significantly lower than the UK average of 1.6 persons per car. This represents an inefficient use of road space and contributes to greater traffic congestion and air pollution. Whilst it is recognised that the private car will continue to provide the primary means of access in areas where alternative travel choices are not viable, the traffic data suggests that the ITS should focus on demand management measures that enable a higher people-moving capacity over the existing road network. Specifically, the strategy should aim for a reduction in the number of single-occupancy car trips into Maidstone town centre by long-stay commuters – particularly during peak periods – which can be achieved through interventions such as enhanced Park and Ride and walking and cycling infrastructure. This approach,

combined with targeted capacity improvements to strategic junctions such as the bridges gyratory, would improve the reliability and hence attractiveness of public transport, as well as providing businesses and freight operators with greater journey time reliability .

### **Car Parking**

**11.64** The provision of an adequate supply of well-located and reasonably priced car parking is essential to support the borough's retail economy, to facilitate access to areas where alternative travel modes are limited or unavailable, and to ensure that mobility impaired persons are able to access key education, employment and leisure opportunities. However, the supply of car parking also drives demand for limited road space and can therefore contribute to traffic congestion and poor air quality, as well as making more sustainable modes of travel less attractive. Therefore it is crucial that MBC and its partners avoid an overprovision of parking, particularly in and around Maidstone town centre.

**11.65** The ITS will seek address parking issues by producing a refreshed Town Centre Parking Strategy, prioritising shoppers and visitors; giving consideration to a reduction in town centre long-stay parking supply; utilising town-centre parking tariffs to encourage a shift to sustainable modes of transport such as Park and Ride and reviewing the Residents' Parking Zones to ensure they are fair, simple and meet the needs of all road users.

### **Park and Ride**

**11.66** MBC has been operating Park and Ride services in Maidstone since the early 1980s and was one of the first local authorities in the UK to introduce the concept. The service aims to address the growing peak time congestion in the town centre and has met with varying levels of success to date. Three sites are currently in operation at London Road, Sittingbourne Road, and Willington Street, which in total comprise some 1,450 parking spaces.

**11.67** During the 2012/13 financial year some 400,000 transactions were recorded on Park and Ride bus services, which equates to a fall of 7% from the previous year . The Park and Ride services are also available for use by concessionary pass holders, and indeed approximately half of the trips recorded in 2012/13 were made by this group.

**11.68** The reduction in patronage can be partially explained by the recession and suppressed economic activity in the town centre. Usage of the Park and Ride service should also be considered in the context of the supply of town centre car parking (both public and private) and the associated parking tariffs. The Park and Ride service is used by both commuters and shoppers; however it accounts for just 2% of all person trips into the town centre during peak periods (excluding walking and cycling), compared to 12% for bus and 77% for private car . The service currently requires a significant annual subsidy and therefore the ITS is seeking to take a targeted approach to address this situation.

**11.69** The ITS is targeting the provision of an enhanced Park and Ride service, with an improved site on Old Sittingbourne Road in the vicinity of M20 Junction 7 and on the A229 corridor at Linton Crossroads to the south of the town, aimed at long-stay commuters into the town centre. Bus priority measures will also be provided on Park and Ride routes in tandem with the enhanced service.

## **Bus services**

**11.70** Maidstone borough has a well established bus network provided principally by Arriva, together with a number of smaller independent operators. The network is centred on Maidstone town centre and combines high frequency routes serving the suburban areas with longer distance services providing connections to many of the outlying villages and neighbouring towns, including Ashford, Sittingbourne, Tonbridge, Tunbridge Wells and the Medway Towns.

**11.71** Although KCC and the council do not directly influence the provision of commercial bus services, both authorities work closely with the operators to improve the quality of services and to ensure that the highway network is planned and managed in a way that facilitates the efficient operation of buses. This relationship has been formalised through the signing of a voluntary Quality Bus Partnership (QBP) agreement, which includes commitments by Arriva, KCC and MBC to work collectively to improve all aspects of bus travel and to increase passenger numbers.

**11.72** A number of services cannot be provided commercially and are classed as socially necessary services that require subsidy from KCC. These primarily consist of school, rural, evening and weekend services, which provide access to education, employment, healthcare, or essential food shopping. KCC also completed the countywide roll out of the Kent Freedom Pass during 2009. The County Council now provides free travel on almost all public bus services in Kent for an annual fee of £100 for young people living in the county and in academic years 7 to 11. The County Council also assumed responsibility from MBC for the administration and funding of the statutory Kent and Medway Concessionary Travel Scheme for disabled people, their companions and those aged over 60, in April 2011. As the Local Education Authority, KCC also provides free or subsidised home-to-school transport to children who meet the criteria.

**11.73** Through the ITS bus service frequencies will look to be increased (to at least every 7 minutes) on radial routes serving Maidstone town centre. Bus priority measures will be provided in order to encourage the use of public transport and services will continue to be made more accessible to all users.

## **Rail services**

**11.74** Three railway lines cross Maidstone borough, serving a total of 14 stations. The operator of the vast majority of rail services in the area is the south east franchise holder, Southeastern.

**11.75** The principal rail route serving Maidstone town is the London Victoria to Ashford International line (also referred to as the Maidstone East Line), which includes stations at Maidstone East, Bearsted, Hollingbourne, Harrietsham and Lenham. The average journey time between Maidstone East and London Victoria is an hour and runs half-hourly. The London Charing Cross / Cannon Street to Dover Priory / Ramsgate line passes through the south of the borough, with stations at Marden, Staplehurst and Headcorn. Charing Cross and Cannon Street stations are located in close proximity to the City of London and hence services on this line are heavily used by commuters, which places pressure on the limited station car park capacity in these villages.

**11.76** The Medway Valley Line, connecting Strood and Paddock Wood, runs from north to south across the borough, with stations at Maidstone Barracks, Maidstone West, East Farleigh, Watlingbury, Yalding and Beltring. The line operates as part of the Kent Community Rail Partnership, which has delivered improvements to the stations and promoted the service widely. In May 2011, Southeastern commenced the operation of direct peak-time services between London St Pancras and Maidstone West via Strood and High Speed 1 on a trial basis. This has reduced rail journey times between Maidstone and London to 48 minutes and provided commuters from the town with the option of travelling to an alternative London terminus closer to the City. Collectively, these enhancements have contributed to a 25% increase in passenger numbers on the Medway Valley Line since 2007, putting it in the top 10 lines nationally for ridership growth according to the Association of Train Operating Companies.

**11.77** KCC published its Rail Action Plan for Kent in 2011, which sets out the County Council's objectives for the new South Eastern Franchise. The reinstatement of services between Maidstone and the City of London is the plan's top priority. It also recognises the need for the level of rail fares charged in Kent to offer better value for money and for the roll out of Smartcard ticketing offering combined bus and rail travel, similar to Transport for London's Oyster card.

### **Air quality**

**11.78** Vehicle emissions are a major contributor to poor air quality at both the local level and on a wider global scale. Indeed the entire Maidstone Urban Area has been declared an Air Quality Management Area, primarily due to the level of traffic congestion at peak times. The ITS will therefore support the delivery of the measures identified in the Maidstone Air Quality Action Plan to deliver an improvement in the air quality of the urban area and to reduce pollutant levels below the Air Quality Objective Levels set out by European legislation.

**11.79** Development in or affecting Air Quality Management Areas should where necessary incorporate mitigation measures which are locationally specific and proportionate to the likely impact. Examples of mitigation measures include:

- Using green infrastructure to absorb dust and other pollutants;
- Promoting infrastructure to encourage the use of modes of transport with low impact on air quality; and
- Contributing funding to measures, including those identified in the air quality action plans and low emissions strategies, designed to offset the impact on air quality arising from new development.

### **Influencing travel behaviour**

**11.80** Through the ITS the council, together with KCC, will seek to promote and support a range of initiatives to influence travel behaviour in the borough. This can be achieved through the use of Travel Plans, behaviour change programmes and introducing improvements to encourage greater levels of walking and cycling and the use of transport, car sharing and car clubs.

**11.81** The council, together with KCC, will continue to promote and support the use of Travel Plans as a way of influencing travel behaviour away from journeys by private car to more sustainable modes. Maidstone Borough Council and Kent County Council will continue to

implement and monitor their own corporate Travel Plans as well as securing Travel Plans for new development as part of the planning process. Workplace and School Travel Plans will also continue to be developed, implemented and monitored through partnership working across the borough where appropriate.

### **Cycling and walking**

**11.82** Both KCC and MBC are therefore committed to the provision of a comprehensive cycle network for residents and visitors to Maidstone.

**11.83** The borough currently has a number of cycle routes that link the town centre to the suburban areas; however connections within the town and further afield are limited and there is a lack of cycle parking at key destinations. Consequently, cycle use in Maidstone is very low, the 2011 Census travel to work data indicated that 1% of work trips were undertaken by bike. However 12% of journeys to work were made on foot.

**11.84** The provision of attractive and safe walking and cycling routes with adequate cycle parking will be incorporated within the ITS. The borough's walking environment, its walking routes and its public realm will be developed and improved through local plan policies, the ITS, the IDP, and through the Green and Blue Infrastructure Strategy. The Maidstone Cycling Strategy will be developed through the ITS. These strategies and documents will have the aim of increasing the proportion of trips made by walking and cycling in the borough by 2031.

### **Assessing the transport needs of development**

**11.85** New developments have the potential to generate a considerable number of vehicular and pedestrian trips which in turn has both a direct and cumulative impact on the transport network. Improvements to public transport, walking, cycling and highway infrastructure to mitigate these impacts need to be in place to ensure the increase in trips generated will not lead to an unacceptable level of transport impact. To further minimise these impacts, measures and initiatives must be incorporated into the design of development to minimise vehicular trip generation. Transport Assessments and Travel Plans, developed in accordance with KCC guidance will be expected to accompany all planning applications for new developments that reach the required threshold. New development proposals will also be expected to enter into legal agreements to mitigate both their direct and cumulative impact on the transport network. The council will also seek to secure Construction Management Plans to minimise impacts from new developments during construction.

## **POLICY DM 13**

### **Sustainable transport**

1. Working in partnership with Kent County Council (the local transport authority), the Highways Agency, infrastructure providers and public transport operators, the borough council will facilitate the delivery of transport improvements to support the growth proposed by the local plan. An Integrated Transport Strategy, prepared by the council and its partners, will have the aim of facilitating economic prosperity and improving accessibility across the borough and to Maidstone town centre, in order to promote the town as a regionally important transport hub.
2. In doing so, the council and its partners will:
  - i. Ensure the transport system supports the growth projected by Maidstone's Local

- Plan and facilitates economic prosperity;
- ii. Manage demand on the transport network through enhanced public transport and Park and Ride services and walking and cycling improvements;
  - iii. Improve highway network capacity and function at key locations and junctions across the borough;
  - iv. Manage parking provision in the town centre and the wider borough to ensure it is fair and proportionate and supports demand management;
  - v. Improve transport choice across the borough and seek to influence travel behaviour;
  - vi. Develop the strategic and public transport links to and from Maidstone, including increased bus service frequency;
  - vii. Work with service providers to improve bus links to the rural service centres and larger villages, including route options and frequency;
  - viii. Improve strategic links to Maidstone across the county and to wider destinations such as London;
  - ix. Ensure the transport network provides inclusive access for all users; and
  - x. Address the air quality impact of transport.

3. Development proposals must:

- i. Demonstrate that the impacts of trips generated to and from the development are remedied or mitigated, including where feasible an exploration of delivering mitigation measures ahead of the development being occupied;
- ii. Provide a satisfactory Transport Assessment and a satisfactory Travel Plan in accordance with the threshold levels set by Kent County Council's Guidance on Transport Assessments and Travel Plans; and
- iii. Demonstrate that development in, or likely to adversely affect, Air Quality Management Areas incorporates mitigation measures to reduce impact to an acceptable level, in line with the borough's air quality action plan.

A parking standards supplementary planning document will be produced to provide greater detail in support of the policy.

## DM14 PUBLIC TRANSPORT

### Consultation issues and responses

<b>Policy:</b> DM14 Public transport
<b>Key issues:</b> <ol style="list-style-type: none"> <li>1. Object to bus priority measures</li> <li>2. Need reference to timing of public transport in new development – it needs to be delivered early enough to be considered mode of first choice</li> <li>3. No reference made to rural area, needs commitment to increase public transport in these areas</li> <li>4. Part 1 does not provide enough guidance for developers and should be reviewed</li> </ol>
<b>Key issue 1:</b> Objection to bus priority measures. Increases congestion & pollution. What's the point where buses are polluting, go slow, only have about 5 people on them expect for school time. You really have absolutely no idea how bad the roads are already with congestion in Maidstone I now shop in other towns as its too polluting, too noisy, too expensive to park, poor selection of shops, poor access. It takes me longer to drive round the one way system in Maidstone & Park than driving to Ashford or Bluewater! Take a leaf out of Ashford Books - lots of Business parks, good shops in town plus out of town & new houses but they have built the roads too to cope with it. Nice big dual carriageways & good links to the M20 Officer response: The council supports bus priority measures such as bus-only roads, bus lanes and selective vehicle detection at traffic signals as these are essential tools in ensuring that the limited people-carrying capacity of the road network is being used most effectively. The Council supports these measures as they help to reduce bus journey times, improve bus reliability and increase the efficiency of the bus network, especially when they are considered as part of a whole route approach. Proposed change: No change.
<b>Key issue 2:</b> Need reference to timing of public transport in new development – it needs to be delivered early enough to be considered mode of first choice. Detail: There is no mention of ensuring public transport is provided at an appropriate stage of new developments so that public transport is considered as the mode of first choice Officer response: Agree, the council agrees that new developments require a regular high quality transport service which should be provided early in the development phase to encourage early take up of bus services. Policy DM13 requires that development proposals to provide a satisfactory Transport Assessment and a satisfactory Travel Plan. Proposals will be assessed at application stage using Local Plan and NPPF policies. Proposed change: No change.
<b>Key issue 3:</b> No reference to rural areas. Detail: No reference to rural areas - no commitment to increase public transport to the rural areas Officer response: Maidstone borough has a well established bus network. The network is centred on Maidstone town centre and combines high frequency routes serving the suburban areas with longer distance services providing connections to many of the outlying villages and neighbouring towns. Neither MBC or KCC directly influence the provision of commercial bus services. However, a



<b>Policy: DM14 Public transport</b>
number of services cannot be provided commercially and are classed as socially necessary services that require subsidy from KCC. These primarily consist of school, rural, evening and weekend services which provide access to education, employment healthcare or essential foot shopping.
MBC and KCC will continue to work collectively with the bus operators to improve the quality of bus services to rural areas and to ensure the highway network is planned and managed in a way that facilitates the efficient operation of buses to increase passenger numbers.
Proposed change: No change necessary
Key issue 4: Part 1 does not provide enough guidance for developers and should be reviewed.
Detail: CPRE Protect Kent fails to see in what way part 1 of this Policy actually comprise a development management policy that provides guidance to prospective developers. This seems to be expressions of strategy that would be more at home in Chapters 4 or 5 than here. We would suggest that the construction of the Policy is reviewed or this part is included as an 'SP' Policy and moved to earlier in the Plan, perhaps combined with parts 1 and 2 of Policy DM13 to create a strategic policy on transport.
Officer response: Disagree – Part 1 of policy DM14 sets out the council's preference to improve journey times and make public transport more attractive.
Proposed Change: No change.

## **DM14 PUBLIC TRANSPORT**

Proposed policy following amendments

### **Policy DM 14 Public transport**

- No policy changes proposed

#### **POLICY DM14**

##### **Public transport**

Within the bus and hackney carriage corridors, as defined on the policies map, the council and the highway authority will develop preference measures to improve journey times and reliability and make public transport more attractive, particularly on park and ride routes. Such measures may include:

- i. Dedicated bus lanes, including contraflow lanes where appropriate;
- ii. Bus priority measures at junctions;
- iii. Prioritisation within traffic management schemes; and/or
- iv. Enhanced waiting and access facilities and information systems for passengers, including people with disabilities.

2. Proposals for major development will be permitted if adequate provision is made, where necessary and appropriate, within the overall design and site layout for the following facilities for public transport secured through legal agreements:

- i. Priority or exclusive provision for public service vehicle access to or through the proposed development area;
- ii. Safe and convenient passenger waiting facilities, information systems and signed pedestrian access routes;
- iii. Suitable provision for disabled access to the waiting facilities from all parts of the development area; and
- iv. Suitable provision for disabled access onto buses from the waiting facilities.

## DM15 PARK AND RIDE

### Consultation issues and responses

<b>Policy: DM15 Park and Ride</b>
<p><b>Key issues:</b></p> <ol style="list-style-type: none"> <li>1. Need Park and Ride site on A274</li> <li>2. Park and Ride is unsustainable</li> <li>3. Support in principle, but Linton crossroads is the wrong place</li> <li>4. Air quality impacts</li> <li>5. Disagrees that there is evidence to support Linton Crossroads</li> <li>6. Not enough room for bus priority measures south of Maidstone</li> <li>7. Old Sittingbourne Road should not be included for park and ride; this is subject to a short term lease. Site has more value for economic development use.</li> </ol>
<p><b>Key issue 1 &amp; 3: Need Park &amp; Ride site on A274 and; Support in principle, but Linton crossroads is the wrong place</b></p> <p>Detail: Whilst appreciating the desirability of the P&amp;R site proposed at Linton crossroads we would need to see a comprehensive proposal before being fully supportive. The omission of a Park &amp; Ride site on the A274 is something we recommend is reconsidered.</p> <p>Officer response: The council is supportive of a Park &amp; Ride site at Linton Corner. The proposed site is forecast to perform well above initial expectations and would cover its operating costs. A Park &amp; Ride site on the A274 would only attract trips in the local vicinity with no long-distance trips accessing the site. The Council believes that if a site on the A274 was the sole site to the south of Maidstone, it would perform well and would cover its operational costs. However the site would fail to cover all of the demand that would travel to a Linton Corner Park &amp; Ride site. Therefore a Park &amp; Ride site at Linton is the councils preferred site.</p> <p>Proposed change: No change.</p>
<p><b>Key issue 2: Park &amp; Ride is unsustainable.</b></p> <p>Detail: DM15 - OBJECT - park and ride unsustainable</p> <p>Officer response: The Council considers Park &amp; Ride to be an important part of the council's transport vision for the Borough. New developments have the potential to generate a considerable number of vehicular trips. Improvements to public transport, such as Park &amp; Ride help to mitigate these impacts and ensure that increase in trips will not lead to an unacceptable level of transport impact. The goal of providing a range of park &amp; ride sites is to offer the travelling public a choice with a view to reducing traffic levels, congestion and CO2 emissions.</p> <p>Proposed change: No change.</p>
<p><b>Key issue 4: Air Quality Impacts.</b></p> <p>Detail: Unconvinced that it will be possible to implement safe access to the proposed Park &amp; Ride site at Linton crossroads as there are no bus priority measures in place and there is no scope for measures such as bus lanes to be built. Impact of cars accessing the new park &amp; ride site will have a negative impact on the areas air quality.</p> <p>Officer response: The Council recognises that planning can play an important role in improving air quality and reducing individuals' exposure to air pollutants. The council will review the significance of the air quality impacts from proposals in line with national guidance. Evaluation of air quality impacts will take into account factors such as the number of people affected the absolute levels and the predicted magnitude of the change in pollutant</p>

**Policy: DM15 Park and Ride**

concentrations, the scale and kind of proposed mitigation.

Section 2 of the policy states that new facilities should provide satisfactory access, layout, design, screening and landscaping. Issues such as access to the site access will be considered during the planning application stage.

Proposed Change: No change.

**Key issue 5: Objection to the location of Park & Ride at Linton crossroads.**

**Detail:**

Park and ride is not a sustainable transport panacea, and if poorly located can increase local traffic congestion and pollution and damage the landscape. Park and ride works best where it is well-related to existing communities and not located within more remote stand-alone locations. Old Sittingbourne Road, London Road and Willington Street succeed in this context because they also serve the local community as a bus service. The defunct Langley Park park and ride would have brought optimal benefits because it would have complemented the originally proposed mixed-use development of the site and reduced the generation of local car journeys. However, the proposed Linton Crossroads site is relatively remote from settlements and will therefore increase rather than reduce car journeys, with a major potential for rat running through local country roads, especially from the major development in the Sutton Road / Boughton Monchelsea locality. Further, the Linton Crossroads proposal is totally unacceptable in scale and landscape terms because of the inevitable damage to the irreplaceable landscape of the Greensand Ridge by day and night. The impact of lighting in this prominent location is a particular concern. A smaller 'satellite' park and ride may be acceptable on the A229 corridor but it must be better related to population centres and in a less sensitive location. A location within the A274 corridor well related to the major residential developments along the Sutton Road and avoiding sensitive or bio-diverse landscapes is favoured as an alternative. A key to reducing traffic congestion within Maidstone town centre is intercepting vehicles on the heaviest private car commuting route into the town centre i.e. the A229 Bluebell Hill. A focus of any park and ride policy must therefore be to work with Medway Council to deliver a park and ride serving both Maidstone and Medway Towns along the A229 axis.

Officer response: The Council believes that due to the distance from the town centre of a park & ride site at the A229 on Blue Bell Hill additional costs would be incurred resulting in increased operating costs and the site would fail to make a profit. The modelling outputs also suggest that much of the demand will be from along the M20 corridor to the east<sup>1</sup>. Whilst there may be some journey time benefits for travellers using this route if their ultimate destination is on the north side of the town centre, overall it is considered that this is likely to be considered an unfavourable route choice.

A Park & Ride site on Sutton Road would only attract trips in the local vicinity with no long-distance trips accessing the site. The Council believes that if the site was the sole site south of the town, Sutton Road would perform well and would cover its operational costs. However the site would fail to cover all of the demand that would travel to a Linton Corner Park & Ride site. A park & ride site at Linton Corner is forecast to perform well above initial expectations and would cover its operating costs. A smaller site would require an additional park & ride site to be allocated in the same A229 Linton Hill corridor. A limited site would also not cover the operating costs of the site, nor justify, the 10 minute bus frequency throughout the day<sup>1</sup>.

<sup>1</sup> Maidstone Integrated Parking Strategy Research – Option Appraisal Report – Draft Final Report (April 2012), Para 11.6 – 11.13

**Policy: DM15 Park and Ride**

Proposed Change: No change.

**Key issue 6 – Not enough room for bus priority measures south of Maidstone.**

Detail: Roads in the area are already congested and there are highway safety concerns. The local infrastructure into Maidstone cannot cope with the additional demand and bus priority measures will not work. The site should be protected as it was in the previous Local Plan. There will be impacts on wildlife and additional noise, light pollution and environmental damage.

Officer Response: The council is working in partnership with Kent County Council (the local transport authority), the Highways Agency, infrastructure providers and public transport operators to facilitate the delivery of transport improvements to support the growth proposed by the local plan. An Integrated Transport Strategy is in the process of being prepared by the council and its partners, which will aim to improve accessibility from the south of Maidstone and across the borough to Maidstone town centre.

Proposed Change: No change.

**Key Issue 7 - Old Sittingbourne Road should not be included for park and ride; this is subject to a short term lease. Site has more value for economic development use.**

Detail: Both policies identify land at Eclipse Park ('Old Sittingbourne Road') as a Park & Ride site. This site, although currently operating as a Park & Ride site, is subject to a short term lease to Maidstone Borough Council which expires in November 2014. No new or extended lease is in place and no terms have been agreed for continued leasing of the land.

Furthermore, the landowner has confirmed that the site is not available for continued Park & Ride use, and the land is not available at a value likely to be affordable for Park and Ride at the site to be viable, as it has inherent economic development value for the reasons already outlined.

Given this, it cannot be demonstrated that the site is available and is not therefore deliverable. The site is thus not effective and is unsound.

Notwithstanding availability, this site does not present the most suitable site in the Junction 7 area for Park & Ride development. As draft Policy DM17 confirms (and as supported by the Plan's evidence base and the site's planning history), Eclipse Park forms a key strategic employment site for development as part of the Plan's spatial strategy. To designate a large portion of the site to Park & Ride development thus fails to make best and effective use of this site and does not therefore deliver sustainable development.

The Council have failed to assess alternative locations in the area that would not result in the effective loss of key employment land. It is considered that such a search for alternative sites should be undertaken to find land more suited for Park & Ride provision that would not forego prime employment land and would deliver the sustainability benefits that Park & Ride at Junction 7 would bring. Furthermore, the Integrated Transport Strategy does not provide any basis to conclude that Eclipse Park is the most suitable site at Junction 7, notwithstanding its unavailability for the Plan period. The ITS lacks sufficient evidence to reach a conclusion on the strategy for Park & Ride at Junction 7 and in the absence of this and clear agreement with KCC on the strategy, there can be no certainty at present over delivery, irrespective of site availability. Even if the site at Eclipse Park were available and affordable, then the case has not been made.

**Policy: DM15 Park and Ride**

In its current form therefore, these policies are unsound as they are not proven to be deliverable and are thus not effective; are not consistent with National Policy as they compromise the delivery of sustainable economic development; and are not justified as more suitable alternatives should be sought in any event. Accordingly and to make the Plan sound, these policies should be amended to delete reference to the Eclipse Park site as it is not deliverable and a more suitable alternative site in the vicinity of Junction 7 should instead be identified in the event that it is concluded Park and Ride at Junction 7 is required.

The Local Plan is intended to provide a vision for Maidstone to 2031 and as drafted clearly fails to reflect the needs of the market and the opportunities for Maidstone that they represent.

I trust that the above comments will be given due consideration and would be happy to provide any further information or answer any queries as required.

**Officer Response: Reject:** The existing site on Sittingbourne Road has a long established use as a park & ride site and was allocated in the Maidstone Borough-Wide Local Plan 2000. Paragraph 30 of the NPPF encourages the support of solutions to reduce congestion. The council fully supports the continued use of the park & ride facility located on Sittingbourne Road. The use of the site for park & ride will continue to reduce car borne pollution in built up areas and reduce congestion in Maidstone town centre.

Park and ride is an important part of the council's transport vision for the Borough. A Study of park & ride opportunities in the borough was undertaken in April 2012 as part of the Maidstone Integrated Parking Strategy Research, which identified that the existing site on Sittingbourne Road will continue to have significant utilisation during the AM peak period accommodating demand for access to the town centre from the A249/M20 transport corridor. No other sites have been submitted during a call for sites that would serve the A249/M20 transport corridor. The Sittingbourne Road site has an existing use as a park & ride site and is the council's preferred option for a park & ride site serving the A249/M20 transport corridor.

**Officer Response: No change.**

## **DM15 PARK AND RIDE**

Proposed policy following amendments

### **Policy DM 15 Park and ride**

- No policy changes proposed

#### **POLICY DM15**

##### **Park and ride**

The following sites, as defined on the policies map, are designated bus park and ride sites:

- i. Old Sittingbourne Road (to serve the A249 corridor);
- ii. London Road (to serve the A20 west corridor);
- iii. Willington Street (to serve the A20 east corridor); and
- iv. Linton Crossroads (to serve the A229 corridor).

2. The provision of new or replacement park and ride facilities should meet the following criteria:

- i. Satisfactory access, layout, design, screening and landscaping;
- ii. Provision of suitable waiting and access facilities and information systems for passengers, including people with disabilities; and
- iii. The implementation of complementary public transport priority measures both to access the site and moreover along the route. Measures will include dedicated bus lanes (including contraflow lanes where appropriate), together with bus priority measures at junctions.

