



Technical Note – ABC Response to HE Representations **Ashford Local Plan**

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1 Introduction

1.1 Overview

- 1.1.1 The following Technical Note sets out Ashford Borough Council's (ABC) response to Highway England's (HE) representations on the draft Local Plan to 2030 from August 2016. Following a meeting between HE and ABC on 5th August 2016, it was agreed that ABC would provide a detailed narrative to set out the differences in the principal housing, employment and other major traffic generating uses between the Core Strategy 2008 and the emerging Local Plan; and their likely impacts on the Strategic Road Network (SRN).
- 1.1.2 Since August 2016, the need for further changes to the emerging Plan have arisen primarily from a re-calculation of the 'objectively assessed housing' figure for the borough as a consequence of the revised 2014-based national household projections. This has resulted in ABC needing to allocate more land for housing in the new Local Plan to address these needs and so it is only now that it is possible to fully assess the potential impact on the SRN.
- 1.1.3 This note expands on the information previously provided by ABC to HE to examine in more detail the traffic impacts of both the previous Core Strategy and new Local Plan. A comparison of the broad traffic generation of both scenarios will be provided and the potential impacts on the SRN within the study area considered.

1.2 Background

- 1.2.1 In 2003, Ashford was designated one of 4 'growth areas' in South East England in the Government's Sustainable Communities Plan. Through the subsequent Greater Ashford Development Framework (GADF), the intention was that the town of Ashford and its immediate surroundings would identify land for up to 31,000 new houses and 28,000 new jobs over a thirty year period from 2001-31.
- 1.2.2 Much transport and traffic modelling went into supporting the GADF and the subsequent Core Strategy which specifically considered the period from 2006-21. This included the identification of necessary transport infrastructure improvements to support these levels of development. Principally amongst these were the delivery of a new Junction 10a on the M20 and improvements to Junction 9 and the nearby A28/A20 Drivers roundabout.

- 1.2.3 The Junction 9 and Drover’s roundabout scheme has since been delivered through Regional Infrastructure Funding from the HCA, whilst Junction 10a is now being delivered through a Development Consent Order which is currently at examination stage. If the DCO is granted, it is anticipated that construction would commence in 2018 with the new junction completed and open to traffic in mid-2019. It is acknowledged that without Junction 10a, neither the Core Strategy nor the emerging Local Plan to 2030 would be deliverable and a fundamentally different solution would be needed.
- 1.2.4 In comparing relative scales of new development based on the Core Strategy and the new Local Plan, it is also relevant to also compare the phasing and rate of development anticipated as this would have been taken into consideration in the modelling that underpinned the GADF / Core Strategy assumptions. Since the adoption of the CS in 2008, development rates in the Ashford Growth Area have been significantly below those envisaged at the time for a range of reasons and this may be relevant in establishing capacity on the SRN over the course of the new Local Plan to 2030.

2 Core Strategy 2008 vs Local Plan to 2030

2.1 Core Strategy 2008

- 2.1.1 In headline terms, policy CS2 of the Core Strategy required the provision of 16,770 dwellings and 16,700 new jobs (ignoring any contingency allowances) over the period 2006-21. The Core Strategy sets out specific targets for Ashford Town Centre and the rest of the urban area over this period. It also set out (in policy CS5) targets for housing and jobs at the two major urban extensions in the Plan – at Chilmington Green and Cheeseman’s Green/Waterbrook both for the period up to 2021 but also indicated capacity post 2021 too, taking account of the GADF work. Furthermore, policy CS5 required the council to subsequently identify a third growth area around the town with its own housing and jobs targets pre and post 2021.
- 2.1.2 The consequence of policy CS5 is that delivery of at least a further 7,850 houses and 1,400 jobs post 2021 from the urban extensions alone was committed. This creates an overall commitment from the Core Strategy to 24,550 houses and 18,100 new jobs in the Ashford area from 2006.
- 2.1.3 The broad distribution of this scale of development is set out in the Core Strategy with more site specific detail that followed in the subsequent ‘daughter’ DPDs for the Town Centre (2010), Urban Sites (2012) and Chilmington Green (2013). Phasing assumptions were made initially in the Housing Trajectory which is set out at appendix 4 to the Core Strategy.
- 2.1.4 Table 2-1 below sets out the site capacities on the main sites and phasing derived from the Core Strategy.

Site	Housing to 2021	Jobs to 2021	Housing/jobs post 20-21
Cheeseman’s Green/ Waterbrook	4,300	1475 jobs	2,200 homes & 750 jobs
Chilmington Green/ Discovery Park	3,350	600 jobs	3,650 homes & 400 jobs
3 rd urban extension	1,500	200 jobs	2,000 homes & 250 jobs
Town centre sites	2,500	8,000 jobs	
Newtown Works	928	-	
Kennington	605	-	
Eureka / Bockhanger Wood	800	46 hectares	
Warren	323 & P&R	-	
WHH/ Willesborough Lees	250	Hospital expansion	
Barracks	1,250	-	
Park Farm	780	-	
Sevington	-	165,000 sqm B1-8 overall to 2030	

Table 2-1: Core Strategy – Development Projections

- 2.1.5 Of the sites listed above, a broad assessment of implementation shows that relatively little of the above has yet been constructed.
- 2.1.6 In respect of housing, development at Cheeseman’s Green (Finberry) has commenced and to April 2017, around 200 dwellings had been completed. Development is only just commencing at Chilmington Green with no completions expected until 2018. Elsewhere, in the town centre, the only major new housing scheme completed is the conversion of Charter House providing circa 250 flats although circa 80 new dwellings are under construction at Godinton Way and some office to residential conversions through PD rights have also occurred. At Newtown Works, 108 units have been completed. At the Warren, 67 dwellings, a care home plus a John Lewis at Home retail store have been completed. Finally, the Barracks and Park Farm sites have developed consistently over the last few years and these are delivering out as predicted.

2.1.7 In respect of new jobs, the expansion to the County Square Shopping centre provided some additional employment in the town centre and a first phase of the Commercial quarter is under construction but no other town centre jobs have come forward. Elsewhere, there has been some limited take up of space at Eureka and Orbital Park on either side of the town but the majority of space at Eureka remains vacant at the present time.

2.2 Local Plan to 2030

2.2.1 Although planning to a different end date to the Core Strategy, the emerging Local Plan relies on a number of the existing 'commitments' from the Core Strategy and its related set of DPDs, although in some cases, the new Plan reflects a considerable lower scale of proposed development to 2030 than the Core Strategy did.

2.2.2 Notably, the context for the Plan is markedly different from that which underpinned the Core Strategy. The revocation of the South East Plan and the demise of regional-tier planning coupled with the emergence of the NPPF has changed the basis upon which Local Plan housing targets are to be determined. Although the 'Duty to Co-operate' has also been introduced, no representations have been received from any other District seeking accommodation of any of their unmet housing need and recent Local Plan examinations at Canterbury, Swale and Maidstone have all progressed on the basis of those districts meeting their own objectively assessed housing needs.

2.2.3 On the basis of the proposed revisions due to be considered by the cabinet in June 2017, the headline target for housing in the borough over the remainder of the Plan period (2017-30) is 12,750 dwellings. Of this figure, approximately 10,500 dwellings are proposed to be accommodated on allocated or committed sites in or around Ashford.

2.2.4 The following table sets out the principal allocations (as proposed to be revised in June 2017) and expected phasing of commitments to 2030:

Site	Houses to 2030	Jobs to 2030
Cheeseman’s Green	1,400 (1,100 committed + 300 additional)	8,500 sqm B1
Waterbrook	350	20 ha commercial space + 300 space lorry park
Chilmington Green	2,500 completions	600 jobs
Court Lodge	950	-
South of Kingsnorth	550	-
Town centre	1400	55,000 sqm B1
Newtown Works	350	?
Kennington (two sites)	870	-
Park Farm extensions	425	-
Eureka	375	20 ha commercial
A20 corridor sites	300	-

Table 2-2: Local Plan – Development Projections

2.3 Principal Differences to 2030

2.3.1 Behind the differences in overall development quantum and delivery rates to 2030 identified above, changes to some key overall commitments have also occurred.

2.3.2 At Chilmington Green, the subsequent adopted Area Action Plan and outline planning permission has set the overall quantum of housing development at 5,750 dwellings, which is 1,250 units less than the Core Strategy assumption of 7,000 units. By 2030, only 2,500 units are predicted to be completed compared with nearly 7,000 in previous assessments - a reduction of 4,500 units at that stage.

2.3.3 At Cheeseman’s Green, the proposed re-allocation of the ‘nib’ land from B1 to residential use in the new Local Plan means a significant reduction from the commitment in the outline planning permission of circa 70,000 sqm of B1 space at the site. More generally, the overall figure proposed for the Cheeseman’s Green and Waterbrook areas is 1,750 dwellings, which is 4,750 dwellings less than the overall figure promoted for that area in the Core Strategy.

2.3.4 For the '3rd growth area' assumption in the Core Strategy, the sites at Court Lodge and south of Kingsnorth act as a proxy in the new Local Plan. These sites would deliver 1,500 units by 2030 compared to 3,500 units assumed in the Core Strategy – a reduction of 2,000 units.

2.3.5 A comparison of all main sites/areas between the two plans is shown in the table below:

Site	+/- houses to 2030	+/- jobs to 2030
Cheeseman's Green/ Waterbrook	-4,750	-70,000 sqm B1
Chilmington Green	-4,500	-400 jobs
3 rd urban extension	-2,000	-450 jobs
Town centre	-1,100	-2,500 jobs
Newtown Works	-578	?
Kennington	+265	No change
Eureka / Bockhanger Wood	-425	-26ha
Warren	-c.160	John Lewis at Home No Park & Ride
Willesborough Lees	-50	No change
Barracks	No change	No change
Park Farm	+425	No change
Sevington	No change	No change
A20 corridor	+300	No change
Total	-12,573	-

Table 2-3: Difference in Development Projections

2.3.6 Therefore, at this broad level, this shows that a net figure of around 12,500 fewer dwellings on these sites are now expected to be delivered by 2030 within the Local Plan scenario. For jobs, the comparison is less straightforward but significantly less floorspace is now expected to be delivered by 2030 than was expected to be the case in 2008.

3 Traffic Impact

3.1 Trip Generation

3.1.1 In order to provide an indication of the traffic impacts of both scenarios appropriate trip rates have been applied to the residential development quanta to derive a comparison of the likely total trip generation between the Core Strategy and new Local Plan. It is intended to undertake this exercise on the residential elements of the developments only as these are considered to represent the main generators of new trips on the network.

3.1.2 It is acknowledged that at the time of the assessment work for the Core Strategy there were proposals for significant sustainable transport improvements in Ashford in the form of the SMARTLINK bus system, which is no longer being proposed. As such the trip rates used within the Core Strategy assessments were lower than those agreed for more recent determined application sites. It is therefore considered reasonable and robust to apply alternative trip rates to the Core Strategy and Local Plan scenarios in order to reflect the prevailing context of sustainable transport proposals at the time.

3.1.3 Residential trip rates have been taken from determined sites within Ashford at Chilmington Green and Conningbrook. As a benchmark Amey derived a current residential trip rate from TRICS, which sat in the middle of the two agreed trip rates for the above sites in Ashford. The trip rates are detailed in Table 3-1 below:

Residential Trip Rates	AM Peak			PM Peak		
	Arr	Dep	Total	Arr	Dep	Total
Suburban Sites (TRICS)	0.146	0.35	0.496	0.308	0.2	0.508
Chilmington Green TA	0.15	0.29	0.44	0.27	0.16	0.43
Conningbrook TA	0.145	0.412	0.557	0.402	0.221	0.623

Table 3-1: Residential Trip Rates

3.1.4 To provide a comparison of the traffic generation of both scenarios the lowest trip rates (Chilmington Green) has been applied to the Core Strategy development quanta while the highest trip rates (Conningbrook) have been applied to the Local Plan developments. A comparison of the resulting trip generation for both scenarios is providing the Table 3-2 below:



Site	Local Plan Residential			Core Strategy Residential		
	Dwellings to 2030	AM Peak Trip Generation	PM Peak Trip Generation	Dwellings to 2030	AM Peak Trip Generation	PM Peak Trip Generation
Cheeseman’s Green	1,400	780	872	6,500	2,860	2,795
Waterbrook	350	195	218			
Chilmington Green	2,500	1393	1558	7,000	3,080	3,010
Court Lodge	950	529	592			
South of Kingsnorth	550	306	343			
Town centre	1,400	780	872	2,500	1,100	1,075
Newtown Works	350	195	218	928	408	399
Kennington (two sites)	870	485	542	605	266	260
Park Farm extensions	425	237	265	780	343	335
Eureka	375	209	234	800	352	344
A20 corridor sites	300	167	187			
3rd Urban Extension				3,500	1,540	1,505
Warren				323	142	139
Willesborough Lees				250	110	108
Barracks				1250	550	538
Windfall/permissions	1,030	574	642	114	50	49
Total	10,500	5,849	6,542	24,550	10,802	10,557

Table 3-2: Residential Trip Generation Comparison

- 3.1.5 The above exercise suggests that, at worst, the Local Plan residential sites would generate 4,954 less trips in total than the Core Strategy in the AM peak, and 4,015 less in the PM peak.

3.2 SRN Impacts

- 3.2.1 While it can be inferred from the above exercise that the Local Plan would have significantly less impact on the SRN when compared with the previously assessed Core Strategy, the following section considers the specific impacts on the SRN within the study area further.
- 3.2.2 The main considerations for the SRN within Ashford Borough are junctions 9, 10 and the proposed junction 10a on the M20. In addition it has been requested that the potential traffic impacts at Drovers, adjacent to M20 Junction 9, are also considered.
- 3.2.3 With regards to the proposed M20 Junction 10a, the scheme has been designed and modelled by consultants on behalf of HE to provide relief to the existing Junction 10 and to provide sufficient capacity to cater for anticipated growth in the area. The Traffic Forecasting Report and Uncertainty Log has been provided by HE's consultants and reviewed to determine whether the current Local Plan proposals have been sufficiently accounted for within the development of the Junction 10a scheme.
- 3.2.4 Table 3-3 overleaf provides a comparison between the proposed Local Plan residential development and that included within the 'Realistic Scenario' modelled as part of the J10a scheme development.
- 3.2.5 The comparison shows that the Realistic Scenario modelling has incorporated a very similar quantum of development as is currently proposed by the Local Plan. As such, and given that the purpose of the Junction 10a improvements is to provide sufficient future capacity and to relieve Junction 10, it is considered that the likely traffic impacts of the Local Plan at Junctions 10 and proposed Junction 10a have been catered for.

Site	Local Plan Dwellings to 2030	J10a Model 'Realistic Scenario'
Cheeseman’s Green	1,400	1,100
Waterbrook	350	
Chilmington Green	2,500	3,200
Court Lodge	950	
South of Kingsnorth	550	
Town centre	1,400	856
Newtown Works	350	425
Kennington (two sites)	870	
Park Farm extensions	425	
Eureka	375	
A20 corridor sites	300	
Conningbrook		300
Jemmett Road		154
3rd Urban Extension/Post 2017		3,000
Repton Park		650
Willesborough Lees		260
Charter House		344
Windfalls/Permissions	1,030	300
Total	10,500	10,589

Table 3-3: Residential Trip Generation Comparison

- 3.2.6 With regards to Junction 9 and the Drivers roundabout a more detailed junction assessments are intended to provide a comparison of forecast traffic conditions at the junctions within both scenarios. These assessments have not been possible to date in lieu of appropriate forecast traffic flow outputs from the strategic modelling exercise from the Core Strategy.
- 3.2.7 It is intended that the Local Plan scenario assessments will obtain flows from the '2033 Realistic Scenario' of the M20 Junction 10a Model, whilst the Core Strategy would use comparable forecast flows from the associated Ashford Highway and Traffic Study (AHTS) SATURN model with adjusted TEMPRO growth factors applied as appropriate.
- 3.2.8 ABC have engaged with HE with regard to obtaining this data and will carry out further work to resolve HE’s concerns as appropriate going forward.

4 Conclusion

- 4.1.1 This Technical Note has been prepared to provide an overview of the development situation in Ashford and the resultant levels of trip generation which aims to provide comfort to HE that levels of anticipated growth from new development on the SRN are significantly lower than had been previously been modelled and planned for.
- 4.1.2 It is accepted that reasonable assumptions about trip generation may not be comparable given the emphasis on the potential modal shift effects of the proposed 'Smartlink' bus service that fed into the Core Strategy development assessment; however, this has been addressed by applying alternative trip rates to both scenarios. Furthermore, it is reasonable to still expect some, albeit more limited, modal shift arising from improved public transport links being developed in the town through S106 and operator investment plus an increase in the popularity of cycling and walking.
- 4.1.3 An exercise to compare the likely residential trip generations of the previously adopted Core Strategy and the new Local Plan has indicated a significant reduction in the levels of peak hour traffic on the network associated with the reduced quanta of development in the Local Plan.
- 4.1.4 The scheme development work associated with the M20 Junction 10a proposals and the forecast operation of the adjacent Junction 10 have taken into account the level and similar broad locations of development being proposed within the Local Plan. It is therefore considered that these junctions will have sufficient capacity at 2030 to cater for the new Local Plan.
- 4.1.5 ABC and KCC are working with HE to obtain forecast traffic flows to enable comparative assessments of M20 Junction 9 and Drovers roundabout and these will follow when available. However, a reduced impact at these junctions is anticipated with the Local Plan in 2030 compared with the Core Strategy scenario due to the reduced level of development; particularly at Chilmington Green, Eureka, and the Town Centre.