

Issue 3

Are the strategic objectives and the strategic approach to housing delivery and economic development delivery in terms of distribution and location sound having regard to the needs and demands of the Borough, national policy and Government objectives and the evidence base and preparatory processes? Has the Local Plan been positively prepared?

i) Is the strategy selected for the distribution of housing and economic growth, with the emphasis on Ashford town, justified compared to the reasonable alternatives? What is the proportion of development proposed in the urban and rural areas across the plan period? How sensitive are the rural areas to further growth?

3.1 No comment

ii) Is the plan period of sufficient length to ensure the delivery of the strategic objectives?

3.2 We consider that planning for a longer period would be beneficial as it allows the council to look at a wider range of options. See our response in paragraphs 1.13 and 1.14

iii) Will the strategy satisfactorily and sustainably deliver the new development and infrastructure needed over the plan period?

3.3 The provisional housing completion number for the most recent year was given at a recent inquiry to be 562. This is below the 639 the council has forecast for year 1 in the housing trajectory and could suggest that the councils figures are optimistic.

3.4 Of the new rural allocations to deliver in year 2 there are 11 in total and we believe that none yet have planning permission and only 3 have submitted an application which are yet been determined. (application submitted in bold- Pluckley NP, **S60, S37**, S35, S34, S30, S56, **S54**, S53, S27, S51). These 185 homes therefore need to be pushed from year 2 to year 3 or beyond. For homes to be built on these sites in year 2 we would expect them to have planning permission by this point and be discharging conditions/being sold to developers. To use a coin toss analogy the chances of getting no heads on 11 tosses is 1 in 2048. Whilst the council could have just been that unlucky it is much more probable that there is something fundamentally wrong with how the council is assessing the likelihood of these sites coming forward by a certain date.

3.5 By extension if the council considered the rural sites in year 3 to be less probable to deliver quickly than those in year 2 then there is an argument that the sites in year 3 should be reassessed to push many of them into year 4.

3.6 We are concerned with the capacity of the planning department to take the necessary number of decisions within the first 3 years. All major residential decisions must go to ABC's planning committee and we have looked back over the past 3 years of decisions of that committee to form the summary table below (April 2015 to March 2018)

	All residential sites		Sites over 100 homes		Sites under 100 homes	
	Approved	Refused	Approved	Refused	Approved	Refused
Outline (Average day count)	4 320	5 205	1 196	2 141	3 361	3 248
Full (Average day count)	20 290	1 356	3 186	0 0	17 308	1 356
Reserved M. (Average day count)	5 268	0 0	2 220	0 0	3 300	0 0
Total Decisions (Average day count)	29 290	6 230	6 199	2 141	23 314	4 275

(Sites above 100 homes average 257 homes each)

(Sites below 100 homes average 32 homes each)

3.7 We estimate from the housing trajectory that within the next 3 years 46 planning applications will need to be determined (of the 46 we believe around 11 have been submitted but not yet determined). In addition to the 46 to be determined we must add other major residential applications which the council has received but have not yet been determined. We believe that there are 14 of these, bringing the total to 60 decisions needed. Over the next 3 years we can expect that windfall applications will be received for major sites and would suggest adding 15 applications to the total to allow for this bringing the total to 75 applications to be determined in the next 3 years. This number makes no allowance for outline applications which will then subsequently have to have reserved matters applications determined, meaning the 75 figure could be considered conservative. Currently in the bottom 20% of the DCLG's table P151 on decision speed for major residential applications, and which makes heavy use of extension of time agreements, we think that this constraint is a consideration in determining what is an appropriate strategy within the local plan. It is reasonable to think that the submitted plan will likely push the council into special measures on decision speed, particularly as the thresholds rise. We strongly disagree with a push to include many more small sites in order to try and generate a 5 year land supply given this constraint.

iv) In assessing the viability of the Local Plan and having regard to paragraph 173 of the NPPF has sufficient account been taken of all the relevant standards in the Plan and the future implications of CIL?

3.8 We have concerns about the revision of the viability evidence to Court Lodge from 2016 to 2017. The development appears to have become substantially more viable from 2016 to 2017 and it looks particularly odd when compared to the Kennington site S2. Opening up costs are given as being the same when S2 faces few of the costly issues related to flood risk which will be faced by Court Lodge. Between 2016 and 2017 it also became clear that the cost of the Pound Lane Link would be materially more than initially costed. We are also concerned that the value of the land lost in order to provide flood storage compensation for the Pound Lane Link road has not been considered when assessing

viability of Court Lodge, as it would appear that Court Lodge is the only likely site for such compensation given the land adjacent to the Pound Lane Link hosts a Roman settlement and is a scheduled monument.

v) In setting the strategic objectives and the approach to delivery has regard been had to the purposes of the Areas of Outstanding Natural Beauty within the Borough as required by section 85 of the Countryside and Rights of Way Act 2000 and as explained in the PPG on Natural Environment? (ID 8-003-20140306)?

3.9 No Comment

vi) Does the Local Plan plan positively for the infrastructure required across the Borough? Does the Local Plan make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development in line with the PPG on Local Plans (ID 12-018-20140306)? In particular, the Infrastructure Delivery Plan (SD10) identifies a need for additional provision in respect of education, waste water, health infrastructure, sports provision, strategic parks, green space and allotments. Where and how is that provision to be made?

3.10 The council has not submitted transport evidence for sites other than those in the NE quadrant of the urban area. The note in response to Highways Englands concerns (TBD06) makes clear the council is relying on the transport modelling supporting the GADF - 'Ashfords Future Transport 2006'.

3.11 The inspector of the Core Strategy (GBD04) expressed "I do not consider that the present information base is sufficiently robust to enable housing and other requirements to be rolled forward by 5 years without further research" in para 4.9 of page 7, of the inspectors report (in appendix). The information available at the time did not allow for the plan to be extended from 2021 to 2026 and given the comments in paragraphs 1.4 and 1.5 on page 1 it would appear transport was a focus of the inspector's concerns.

3.12 ABC has to date not provided with the further modelling mentioned in 1.5

3.13 We have concerns with TBD06

3.13.1 Paragraph 2.1.2 on page 3, the Core Strategy did not commit to an additional 7,850 homes beyond 2021 it committed to an early review to identify where such homes could be located and simultaneously review of the SMARTLINK proposals, paragraph 5.6 on page 26 (GBD04)

3.13.2 Page 9 of TBD06, It is not correct to head the column as 'Core Strategy Residential' an inspector has not examined a Core Strategy to 2030. The Core Strategy extends to 2021

3.13.3 Page 9 of TBD06, The two columns are comparing different timescales as the Local Plan column compares 2017 to 2030 and the 'Core Strategy' column is comparing 2008 to 2030. We can check this as page V of the Core Strategy gives us 31,000 homes over the period 2001 to 2031. Assuming 1000 per year on average then this is 30,000 over the period to 2030. Then looking at page 10 of the Core Strategy for delivery 2001-2006 we see 3950 homes were expected. Assuming 5000 were expected in the period 2001-2008 then that means the residual between 2008-2030 was around 25,000. This is very close to the 24,550 figure quoted in the 'Core Strategy' column and so validates that this column relates to a different time period to the Local plan column.

- 3.13.4 Page 9 of TBD06, I have then tried to correct the Local Plan figure to cover the same period as the 'Core Strategy' column. Taking all allocations in the Local plan within the Urban area from the housing trajectory the figure totals 10,641
- 3.13.5 Page 9 of TBD06, looking at the authority monitoring reports and taking the completions within the Ashford Urban Area between 2008 and March 2017 then this total 3,735 homes which must be added to the Local Plan column.
- 3.13.6 Page 9 of TBD06, I make no allowance for completions 2017-2018
- 3.13.7 Page 9 of TBD06, A proportion of the windfalls occurring in the Local Plan need to be allocated to the Local Plan column. Looking at page 20 of SD12 suggests 59% Urban and 41% rural over the past 10 years. To be conservative I assume 50% of the 1599 windfalls will occur within the urban area, so add 799 to the Local Plan column.
- 3.13.8 Transport planning is based on committed development and new developments have to assess their impact against not just the current situation but the current situation including those committed developments. Chilmington Green has outline planning permission and for the purposes of estimating the transport constraints that will be applied to future developments it is therefore necessary to include the full 5750 figure for Chilmington Green and not the 2500 figure.
- 3.13.9 If you apply all of the above then the number of homes in the Local Plan period once corrected is 18,425. Applying the same trip factors this is 10,262 trips in the AM Peak and 11,478 in the PM Peak. When comparing these to the 'Core Strategy' column, which was based on a dramatic modal shift, we see that the AM figure for the Local Plan is only 4.99% lower than the 'Core Strategy' trip rate and the Local Plan PM rate is 8.53% higher when compared to the 'Core Strategy'.
- 3.14 It is not appropriate in our view for a Local Plan to be produced based upon transport modelling carried out in the early 2000's. This is especially the case when the expected trip rates are very similar or greater than those originally modelled over a decade ago and which an inspector in 2008 thought were insufficient at the time.
- 3.15 From the Gladman inquiries we anticipate that the council will argue at the local plan hearings for the inclusion of more than 450 homes additional homes within the urban area in the trajectory and 5YLS. This will further enhance the inadequacy of the transport evidence base.
- 3.16 To test our result we can look at the forecast flows from the Ashford's Future Transport Study 2006. In this document on page 66 and 67 we can see that the transport modelling at the time forecast that J10 in 2031 would have inflows of 5100 vehicles in the AM peak and that Junction 10A would have inflows of 2600 vehicles in the AM peak. If the council's research note were correct and the Local Plan results in trip rates more than 40% lower than the 'Core Strategy' then we would expect to see that the Highways England modelling shows figure lower than those assumed in 2006. On page 61 of the Highways England traffic modelling we can see that the AM peak inflows in 2033 to J10 are expected to be 5210 (721+1576+54+2602+257) and for J10A 3382 (289+554+867+811+861). It is therefore clear that despite the lower number of housing expected in the local plan (which is assumed in the Highways England modelling for J10/J10A) the traffic flows are expected to exceed those forecast in 2006 at these junctions. This supports our corrected trip rates and the view that the Amey technical

report is not correct. Junctions across Ashford can expect equal or greater flows than those forecast for the 'Core Strategy'/GADF and we do not have an up to date transport evidence base which can be used to consider these impacts.

- 3.17 Regarding the J10a modelling in TBD06-
- 3.17.1 These do not compare like with like given that the Local Plan period is to 2030 and the J10a modelling to 2033. There are also issues with the starting point for each
 - 3.17.2 Starting with the Local plan side, use sites within the urban area from the trajectory, which totals 10,641. Then add in windfalls expected within the urban area of 799. This totals 11,440.
 - 3.17.3 Turning to the J10a column, some of these numbers should be reduced down to reflect the fact that they have been already built during the time that has passed since the modelling. For example only 394 homes remain in the housing trajectory at Repton Park so this should be reduced to 394 as the others have been built. No homes remain to be built at Charter House. Taking those homes out reduces the figure to 9989.
 - 3.17.4 Making no allowance for the J10a figures being based on 2033 (and so should be further lowered) and that Chilmington Green has been treated incorrectly it is still the case that the Local Plan results in materially more homes than the J10a modelling envisaged.
 - 3.17.5 I met with the Project Manager for the J10a scheme and the people doing the traffic modelling at AECOM in the Aldgate tower in London on the 12th May 2017. It is my understanding from that meeting that the purpose of the modelling is not to model the entire road network around the DCO. The problem with such an approach is that existing bottlenecks elsewhere in the network would mean that you plan the new junction incorrectly. It has to be assumed that over time other constraints elsewhere will be upgraded and therefore you are really modelling driver intent. It is based on the current road network but not limited by it. An example of this would be that we know from the Highways England /KCC Highways comments to the application 15/00866/AS for S4/S5 that they have concerns over the impact of this proposed development on the SRN particularly the A2070 and some of the roundabouts on that road. Were it the case that the J10A modelling was a satisfactory basis for assessing the SRN neither Highways England or KCC Highways would be raising concerns on this site given that the J10a modelling includes an allowance for 3000 homes in Kingsnorth. Highways England have made it clear that the J10a modelling is not an acceptable basis for assessing the Local Plan (document attached to ALP/2711)
- 3.18 The Bellamy Gurner junction scheme is not included in IDS and should be added due to its scale and significance. The constraint imposed by modified condition 32 should also be acknowledged at Finberry, whilst a minimum of 500 homes are allowed further development will not be permitted once the site generates 301 movements in the peak hour until the full Bellamy Gurner scheme is implemented.
- 3.19 The IDS should be considered a live document which is updated regularly and have concerns that this has not been occurring. Highways England commented on application 15/00866/AS (the sites S4 and S5) on the 25th September 2015 as they had concerns that this development could cause severe harm to the strategic network. We feel that this concern should have been reflected in the IDS and the site assessments.

- 3.20 The more recent comments of KCC Highways to the application 15/00866/AS (the sites S4 and S5) in January 2018 give a more specific idea of the number of capacity constraints for sites S4/S5 and by extension due to proximity S3. We would suggest these constraints would have been foreseen had ABC commissioned suitable traffic modelling of the local plan allocations, in response the concerns to Highways England and consistent with the duty to cooperate, resulting in a different distribution of housing within the Ashford urban area.
- 3.21 We requested list containing a postcode for each person on the allotment waiting list (2017) from ABC and plotted this onto a map of the urban area. This is included in the appendix, to a spatial idea of allotment demand.

Appendix contents-

- Page 7 Appendix contents
- Page 8-9 – Extract from Inspectors report on Core Strategy 2008, pages 2 and 7. Document referenced in paragraph 3.11. Full document available from the link below
https://www.ashford.gov.uk/media/2443/core-strategy_final_inspectors_report.pdf
- Page 12 - Extract from Transport Assessment supporting J10A, page 69. Document referenced in paragraph 3.16. Full document available from the below link, filter by 'transport assessment'

<https://infrastructure.planninginspectorate.gov.uk/projects/south-east/m20-junction-10a/?ipcsection=docs>

- Page 13 -14 – Highways England response to application on sites S4 and S5. Document referenced in paragraph 3.17.5 and 3.19
- Page 15 -19 – KCC Highways response to application on sites S4 and S5. Document referenced in paragraph 3.17.5 and 3.20
- Page 20 – Bellamy Gurner junction scheme. Relevant to paragraph 3.18
- Page 20 – Map showing broad location of those on the allotment waiting list within the urban area. Relevant to paragraph 3.21

1 Introduction and Overall Conclusion

- 1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:
 - (a) whether it satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document; and
 - (b) whether it is sound.
- 1.2 This report contains my assessment of the Ashford Core Strategy DPD (the CS) in respect of the above matters, along with my recommendations and the reasons for them, as required by s20(7) of the 2004 Act. It first considers the procedural tests, and then goes on to deal with the relevant matters and issues considered during the examination in terms of the tests of conformity, coherence, consistency and effectiveness set out in PPS12.
- 1.3 My role has been to consider the soundness of the submitted CS against the tests. In line with national policy, my starting point was that the CS should be presumed sound unless shown to be otherwise by evidence considered during the examination. Moreover, changes should be required only where there is a clear need to amend the document in the light of the tests.
- 1.4 In this case the evidence presented during the 3 weeks of hearing sessions originally scheduled left me with serious concerns regarding the soundness of the CS as submitted. My concerns related particularly to the adequacy of the information base in several areas as well as the adequacy of the justification given for some of the options chosen, in particular the decision to delay any third major expansion area beyond the end of the CS period¹. Other concerns related to the unevenness of the frontloading process - some key stakeholders, primarily developers and landowners, appeared to have been much less involved than others. In addition, in places the CS relied on other non-statutory documents for its interpretation, including interpretation of the transport policy.
- 1.5 In an effort to resolve these matters I held further hearing sessions on 3-4 September and 15-16 November 2007. Following the latter sessions a series of written exchanges took place early in 2008 to clarify points that were still outstanding. During this process the Council, at my request, re-ran the transportation model to test the effects of a lower level of patronage of the proposed new public transport system - 'SMARTLINK'.
- 1.6 As a result of these exercises I consider that recommendations for changes can be made that would enable the CS to be found sound. However, the changes required are extensive. They go beyond what is likely to be appropriate in many circumstances and are recommended only on the basis that the situation in Ashford is unusual and that there is an urgent need for a strategic plan to be in

¹ See Inspector's Note 2 attached as part of Appendix 1

Issue 2 - appropriateness of the plan period

- 4.8 The CS is intended to cover the period up to 2021. Some representations have suggested that the end date should be extended to 2026 to conform with the emerging RSS or even 2031, which would tie in with the final phase of GADF.
- 4.9 In my view, there are too many uncertainties, including the lack of higher level guidance, to be able to plan forward with confidence as far as 2031. There would be more merit in seeking to tie in with the end date of the South East Plan, but I do not consider that that is essential to ensure that the CS is sound. Moreover, I do not consider that the present information base is sufficiently robust to enable housing and other requirements to be rolled forward by 5 years without further research. In the circumstances outlined in section 1, I consider that it would be inappropriate to delay adoption of the CS simply to allow the information to be gathered to allow it to be extended to 2026.
- 4.10 I am more concerned that when it is adopted the submission CS will not provide the 15 year's supply of housing land that Planning Policy Statement 3 (PPS3) now seeks. To this extent test iv, which requires compliance with national planning policy, is not satisfied. Moreover, I would normally expect that a CS that was otherwise sound would be capable of being rolled forward a year or two to overcome such a difficulty. That said, given that the Ashford CS was produced prior to the publication of PPS3, I consider that this matter should be approached with common sense and a degree of flexibility. Furthermore, for reasons that are set out fully below, I consider that there is a compelling need for an early review of the CS. In these circumstances there seems no real merit in seeking to amend the current document to extend its currency to 2023.

Issue 3 – whether sufficient housing land has been identified

- 4.11 In this section I concentrate on the provision being made in the growth area, where the overwhelming majority of house building is proposed. I deal with provision in the rural area under issue 9.
- 4.12 The adopted regional guidance, RPG9, which seems to have been influenced by local studies, sets a target of 13,100 new dwellings to be provided in the growth area between 2001 and 2016. In the emerging RSS (the South East Plan), which has had regard to GADF, the target for 2006 – 2026 is 22,400. The CS2 target of 16,770 new dwellings by 2021 is consistent with these figures and thus complies with test iv.
- 4.13 Several representations have sought an increase in the housing target, primarily to allow flexibility to accommodate any proposed increase in the emerging RSS figure. However, despite the great importance being given to housing in national advice, I consider that increased provision is less likely to be required in Ashford than in most of the South East. The Ashford area has been the subject of much recent study and the Ashford figures are more up to date and

The low volumes and proportions of external to external traffic show that the A2070 in Ashford does not have a strong strategic function, whereas the high proportions of internal / external movements demonstrate its main role as a feeder to the M20 and other external roads such as the A20 and A28.

It is therefore considered appropriate that in the future when the A2070 is surrounded by the growing urban area, it takes on the characteristics of an 'urban road'. The speed limit should be reduced to 40 mph or 30 mph with the relaxing of the present restrictions on access. It is envisaged that there will be a series of linked traffic signal junctions to provide all movements access at the new link road to Junction 10a, Ashford Business Park, Church Road, Orbital Park and the new junction on the southern section at Park Farm.

7.9. M20 Junctions

Existing modelled traffic inflows at M20 Junction 9 are currently around 3,700 vehicles per hour in the AM peak hour. Traffic forecasts for the highway network options estimate inflows of 6,000 to 6,300 vehicles per hour in 2031, or a 63% to 71% increase in traffic. This level of increase can be accommodated by signalisation and re-modelling of the existing roundabout with no significant queuing or congestion in 2031.

Existing modelled traffic inflows at M20 Junction 10 are currently around 5,000 vehicles per hour in the AM peak hour. Traffic forecasts estimate an inflow of around 5,100 vehicles per hour in 2031, the low traffic increase being caused by the addition of the adjacent proposed M20 Junction 10a. The planned Junction 10 Interim Improvement Scheme will provide additional capacity for traffic growth in the period before Junction 10a is implemented and before the proposed public transport improvement measures are effective.

The new M20 Junction 10a is forecast to have traffic inflows of around 2,600 vehicles per hour in the AM peak hour. This level of traffic can be accommodated with no significant queuing or congestion by a signalised roundabout.

Without Junction 10a and with only the Interim Improvement at Junction 10 traffic inflows at Junction 10 are forecast to increase to over 7,000 vehicles/hour in the AM peak in 2031. This will cause considerable congestion at Junction 10 and there will also be knock-on effects in other areas of Ashford. Traffic flows through Junction 9 would actually be lower than with Junction 10a because traffic diverting away from Junction 10 will cause congestion on other routes leading to Junction 9. General network performance would deteriorate and traffic conditions would be unacceptable. It is concluded that increased traffic capacity at Junction 10 is essential to accommodate long term development. This is currently conceived to be by the addition of the new Junction 10a to the east of Junction 10, but in view of relatively low traffic usage other improvement options may need to be investigated by the Highways Agency.

Actions:

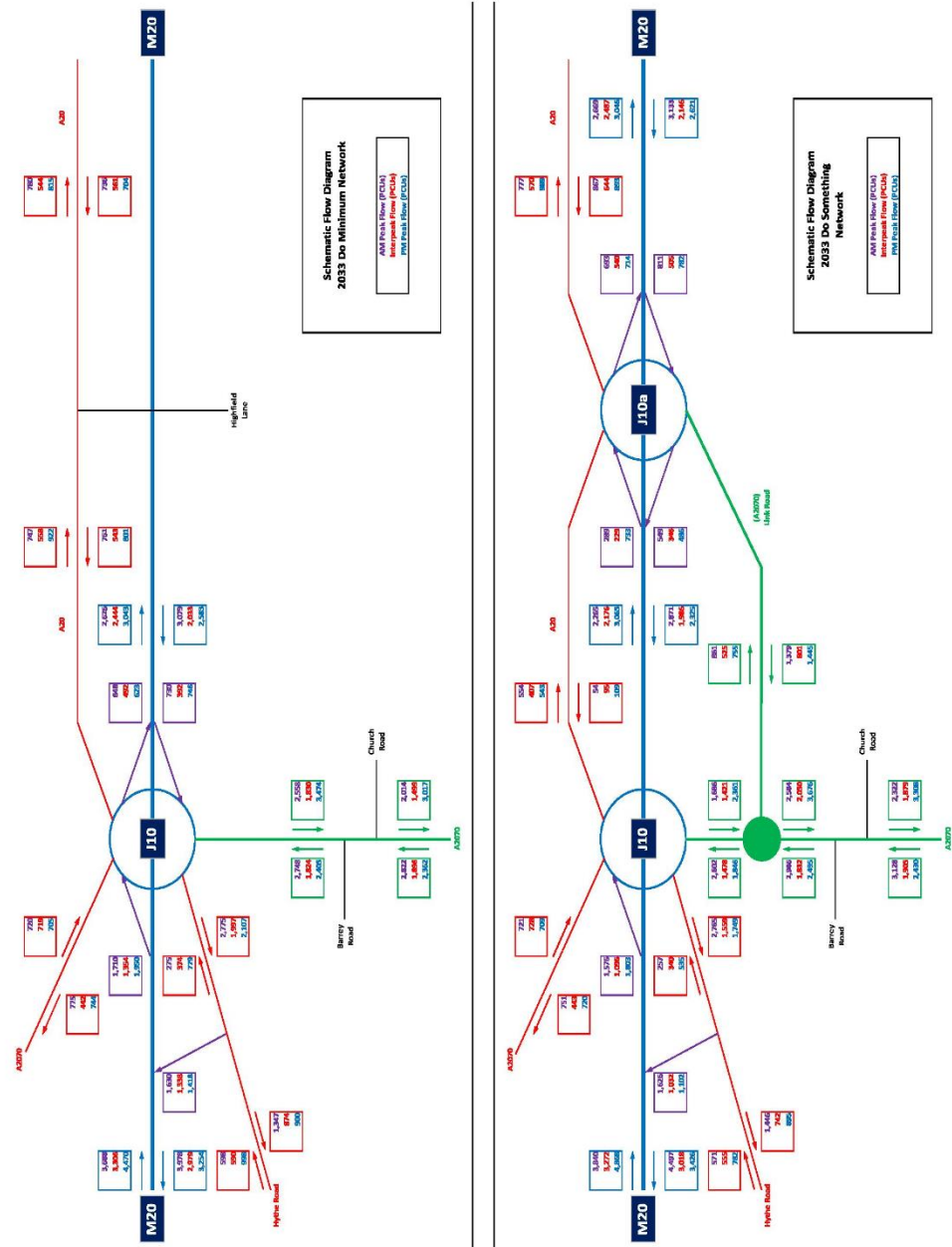
- 1) Promote the programme of junction improvements through developer funding or the LTP integrated transport programme.***
- 2) Lobby for the early provision of an M20 Junction 10a.***
- 3) Ensure development control policy is in line with the Transport Strategy.***

8. Parking Strategy

8.1 Need for a Strategy

Parking is a very emotive issue but it is extremely important that parking strategy is used as a tool to effectively manage traffic demand by controlling the quantity, location and pricing structure. Thus, parking will play a key part in the overall Transport Strategy for encouraging the use of sustainable transport modes. Both the supply and cost of parking in the town centre will influence modal share. However, there will be a need to strike a balance between restricting the growth in the supply of parking (which will promote the use of public transport) and the avoidance of any restriction to investment in the town centre. The key problems and issues are recognised as:

Figure 7.5: 2033 Traffic Flows – 'Do Minimum' and 'Do Something Network'



HA514442-MMGJV-GEN-SMW-RE-Z-7201
Revision A

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Subject:FW: 15/00856/AS - Land at Pound Lane, Magpie Hall Road, Bond Lane and, Ashford Road, Kingsnorth, Kent

From: Jacobs, Keith [<mailto:Keith.Jacobs@highwaysengland.co.uk>]

Sent: 25 September 2015 14:56

To: Sue Head

Subject: 15/00856/AS - Land at Pound Lane, Magpie Hall Road, Bond Lane and, Ashford Road, Kingsnorth, Kent

For attention of: Sue Head

Site: Land at Pound Lane, Magpie Hall Road, Bond Lane and, Ashford Road, Kingsnorth, Kent

Proposed development: Outline application for a mixed use development comprising:
- Up to 750 dwellings in a mix of size, type and tenure. - Up to 210 sq.m (gross internal floor space) of A1 – A5 uses, but with no individual units greater than 150 sq. m- Up to 180 sq. m (gross internal floorspace) of community/leisure uses of Classes D1 and D2.- 1 form entry primary school. - Provision of local recycling facilities. - Provision of areas of formal and informal open space. - Installation of utilities infrastructure to serve the development, including flood attenuation, surface water attenuation, water supply, waste water facilities, gas supply, electricity supply (including sub-station, telecommunications infrastructure and renewal energy). - Transport infrastructure including a new access roundabout in the vicinity of the Ashford Road/Magpie Hall Road/Steeds Lane junction, new priority control junctions on Ashford Road, a new distributor road through the site to provide relief to the existing Ashford Road plus an internal network of roads and junctions, footpaths and cycle routes. – New planting and landscaping both within the proposed development and on its boundaries as well as ecological enhancement/mitigation works. - Associated ground works. ****SUBJECT TO AN ENVIRONMENTAL IMPACT ASSESSMENT****

Local Authority reference: 15/00856/AS

Dear Sue,

Thank you for your consultation dated September 10 2015

Our view is that the proposed development may result in severe harm to the M20 Motorway and A2070 Truck Road. We need further information from the applicant to establish whether this is the case. The information we require is:

Traffic Impact Assessment of the development on the SRN at A2070 junctions with Orbital Park access, A2042 Romney Marsh Road and at M20 Junctions 9 and 10.

Highways England do not agree with the assumption that " the assessment of development impact on the strategic road network is therefore inherent in the above mentioned studies and models" (referring to the Ashford Highways and Traffic Study SATURN Model and Ashford Town Centre Study VISSIM model). Whilst development contained within the existing modelling may not have come forward as anticipated, the location and Impacts of the resultant traffic flows would be most likely spread across the model area it would not be correct to assume that they would be specific to the Kingsnorth area.

Therefore, we would ask the applicant to look further at each of these junctions and provide a traffic impact analysis through to the year of full occupation.

We will write again when we have received this further information and have evaluated it.

This email does not constitute a formal recommendation from Highways England. We will provide formal recommendation later when we can be confident that the application is in its final form. To assist us with this we would be grateful if you would advise when you expect to determine the application.

Yours sincerely



Ashford Borough Council
Civic Centre
Tannery Lane
Ashford
Kent
TN23 1PL

Highways and Transportation
Ashford Highway Depot
4 Javelin Way
Ashford
TN24 8AD
Tel: 03000 418181
Date: 5 January 2018

Application - 15/00856/AS

Location - Land at Pound Lane, Magpie Hall Road, Bond Lane and, Ashford Road, Kingsnorth, Kent

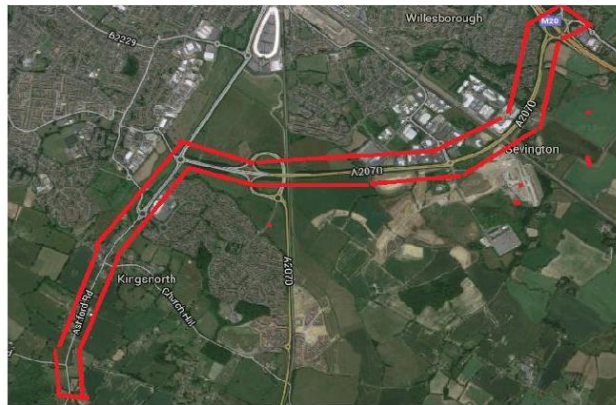
Proposal - Outline application for a development comprising of up to 550 dwellings in a mix of size, type and tenure. Provision of local recycling facilities. Provision of areas of formal and informal open space. Installation of utilities infrastructure to serve the development including flood attenuation, surface water attenuation, water supply, waste water facilities, gas supply, electricity supply (including sub-station, telecommunications infrastructure and renewable energy). Transport infrastructure including highway improvements in the vicinity of Ashford Road/Magpie Hall Road/Steeds Lane junction, new junctions on Ashford Road, Steeds Lane, Pound Lane and Bond Lane, plus an internal network of roads and junctions, footpaths and cycle routes. New planting and landscaping both within the proposed development and on its boundaries as well as ecological enhancement/mitigation works. Associated ground works. ****NOW INCLUDES AMENDED DESCRIPTION****

Thank you for your consultation in relation to the amended planning application and supplementary Transport Assessment. Whilst I currently have objections to the application, it may be possible to overcome these objections if the following amendments were made:-

Supplementary Transport Assessment

Crash data needs to be obtained for a wider study area than what is currently shown. As detailed in KCC Highways and Transportation previous consultation response on the application, the extent of crash data should be provided as shown in Figure 1 below. This is from the junction of Magpie Hall Road / Ashford Road / Steeds Lane to the junction of M20 Junction 10. Dialogue should also be undertaken with Highways England in respect of the Strategic Road Network. A section is needed within any amended supplementary Transport Assessment detailing any particular crash clusters (for example the junction of Magpie Hall Road / Ashford Road / Steeds Lane and Pound Lane / Church Hill / Ashford Road).

Figure 1 - Crash (accident data study area)



Proposed Vehicle Accesses and Road Layouts

- General - Vehicle tracking of all of the access points needs to be provided for an 11.4 metre long refuse vehicle and for those routes that are proposed to be bus routes, tracking for a 12 metre long standard bus should be provided.
- General - A designer's response is required by PBA for all of the problems identified in the Stage 1 Safety Audit.
- Area 1 - The Highway Authority has been carefully considering the need for the Pound Lane Strategic Link Road as set out in the current Draft Local Plan. Having considered the cost of the scheme (currently estimated at approximately £16 million), recent modelling that has been undertaken by the Court Lodge promoters which suggests that it will not improve capacity at junctions on Ashford Road and issues of deliverability of such a scheme, I am of the opinion that a much cheaper scheme can be delivered between the south western corner of the Court Lodge site and Area 1 to connect to Ashford Road. This link could be delivered respectively by both sites through the provision of a 6.75 metre wide local distributor road with a 3 metre footway / cycleway on one side and a 2 metre footway on the other side through these sites. As a result Area 1 site access should be modelled to include the Court Lodge development site proposals. It is highly likely that as a minimum requirement a right hand turn lane should be provided to serve this link. I would welcome further discussions with the applicant on this matter but they are aware of this issue. Visibility splays of 2.4 metres by 91 metres are required out of the access onto Ashford Road as Ashford Road is subject to a 40 mph speed limit. This is in accordance with Manual for Streets 2 standards.
- Area 1 - Drawing number 30292_5510_007A. I am of the opinion that the proposed Pound Lane access is not appropriate as it will do little to reduce traffic flows from vehicles travelling in an easterly direction along Pound Lane as this would still be the more direct route for vehicles to go in a northbound direction. An alternative design solution is therefore desirable in my view. This includes the closure of the side arm junction just to the south of the property known as the Hawthorns for vehicular traffic together with the deletion of the other side arm junction proposed from Pound Lane to the proposed development site. This will force all drivers to go to the proposed new junction on Ashford Road. A turning head is not required at this location as Riverside Close can be used as a turning head. The proposed carriageway at this location should be 6.75 metres in width.
- Area 2 - Drawing number 30292_5510_009. Visibility splays of 2.4 metres by 91 metres are required out of the access onto Ashford Road as Ashford Road is subject to a 40 mph speed limit. This is in accordance with Manual for Streets 2 standards.

- Area 2 - Drawing number 30292_5510_004A. The re-located Magpie Hall Road arm should be moved another 10 metres north so that it is 30 metres north of the Steeds Lane junction. This is so that it meets the minimum junction spacing of 30 metres for a Left / Right staggered road feature for a local distributor road as set out in the Kent Design Guide. The section of re-aligned Magpie Hall Road should be a minimum of 6.75 metres in width. This section of closure of Magpie Hall Road will be subject to a Section 278 Highway Agreement and a suitable landscape bund will need to be installed as suggested in the Stage 1 Safety Audit. The bus stop and shelter will also have to be moved further north so that a stationary vehicle is not in the visibility splay for a driver wishing to turn right. The visibility splay out of the site access point onto Magpie Hall Road to the west goes across 3rd party land. This is unacceptable and the access location will have to be moved. Visibility splays of 2.4 metres by 91 metres are required out of the re-aligned Magpie Hall Road onto Ashford Road as Ashford Road is subject to a 40 mph speed limit at this location. This is in accordance with Manual for Streets 2 standards. Visibility splays of 2.4 metres by 91 metres are also required out of Steeds Lane. A fully scaled plan is therefore required showing these required amendments.
- Area 3 - Drawing number 30292_5510_010. The current proposals show two access points off Bond Lane serving areas 3 and 4 respectively together with the closure of Bond Lane to vehicular traffic at either end. The closure of Bond Lane at either end will require an amendment to the Traffic Regulation Order (TRO) for Bond Lane. The access from area 3 will serve a total of 45 dwellings potentially in area 4. Bond Lane will therefore need upgrading to the standard of a Minor Access Road as set out in the Kent Design Guide and will therefore need to be 4.8 metres in width and have a footway width of at least 1.8 metre on one side. Currently the applicant is not suggesting to upgrade Bond Lane, which is not acceptable as it a single width lane with a carriageway width of approximately 3.5 metres in which two vehicles cannot pass one another without significant verge over-run. There is a fairly substantial amount of grass verge on the western side of Bond Lane which could be widened to facilitate widening this section of Bond Lane to a Minor Access Road standard. Vehicle tracking of the two proposed turning heads on Bond Lane needs to be provided for an 11.4 metre long refuse vehicle and the turning heads need to be subject to double yellow lines to prevent any indiscriminate parking taking place. It is not clear how many dwellings the proposed northern access on Bond Lane is supposed to serve so I am unable to comment on the suitability of Bond Lane as a road to serve this part of Area 3.
- Area 4 - Drawing number 30292_5510_011. It is not clear how the proposed visibility splays have been calculated as Steeds Lane is currently subject to national speed limit and so typically visibility splays of 2.4 metres by 215 metres are required. A speed survey will need to be submitted at this location to demonstrate that the proposed visibility splays are acceptable.

Signalisation Pound Lane / Ashford Road / Church Hill junction

The Highway Authority welcomes the applicants proposals for the signalisation of the above junction. I have currently forward the scheme onto my colleagues in the traffic signals team for comment. I do however have the following comments. The submitted Stage 1 Safety Audit does note a number of problems with the current proposals which need to be addressed at this stage.

- The nearside kerb on Pound Lane should be built out to enable to signal pole to be moved forward. A minimum of 43 metre forward visibility needs to be provided (based on a driven speed of 30mph).
- There does not appear to be any pedestrian crossing facilities provided. These are required on all arms of the junction. Pedestrian crossing phases also need to be built into all stages of the LINSIG model as these could get called at any point.
- It appears that the kerb and footway which is to be re-aligned is not within the public highway. The applicant should undertake a land registry search to ascertain who owns this

land and then discuss the proposals with the landowner. The tracking for a large southbound vehicle on Ashford Road continuing the junction shows that the nearside wheels of the vehicle will be very close to striking the new kerb line. In my opinion the kerb line should therefore be moved east by at least another 50 centimetres to prevent the body of the vehicle overhanging the footway.

- A designer's response by PBA is required for all the identified problems.

Enhancement to Local Bus Network

- It is not clear from the current proposals if the applicant is suggesting that the buses could be routed within the site. However, for all properties to be within 400 metres walking distance of a bus stop as per the requirement in the Kent Design Guide: Making It Happen and the Inclusive Mobility Guide, a new circular route will need to be provided within Area 3 so that future residents within Area 4 are within this distance. The access into Site 3 from Ashford Road should therefore be upgraded to a Local Distributor Road standard and be 6.75 metres in width to cater for bus movements through this site. The applicant should therefore contact Steve Benjamin in KCC's public transport team to discuss these proposals in further detail.

Approach to Traffic Impact Assessment on Local Road Network

- KCC Highways and Transportation agrees with the proposed study area of junction assessment. The vehicle trip rates from the proposals have also been agreed with the applicant and the proposers of the adjacent Court Lodge development. The sites included in the committed development section are also acceptable. It is appropriate for the applicant's to undertake a sensitivity test of the proposed Court Lodge development as this has a draft allocation in the Ashford Local Plan.

Development Traffic Impact

- A2070/Waterbrook Avenue/The Boulevard (Orbital Park Roundabout). This junction is within the ownership of Highways England and the only arm of the roundabout that is within the ownership of KCC Highways is The Boulevard. The proposals will impact fairly significantly on this arm in a 2030 + Committed + Development scenario when compared to the 2030 + Committed scenario with the queue worsening by 8 vehicles and an increase in delay by 33 seconds in the PM peak. A mitigation scheme is proposed by Crest Nicholson (Finberry) at the roundabout known as the Bellamy Gurner scheme. Works to this roundabout are likely to commence sometime this year. The applicants should test the impact of their development on this scheme to ascertain whether or not there is sufficient capacity to cater for the proposed development.
- Romney Marsh Road / Norman Road / Kimberley Way. The proposals will impact fairly significantly on this roundabout in a 2030 + Committed + Development scenario when compared to the 2030 + Committed scenario with the queue worsening by 15 vehicles and 41 seconds in the PM peak on the 2042 North arm. A mitigation scheme is proposed by the applicant in the form of improvements to the A2042 north and south arms which will significantly improve the capacity at the roundabout. However no plan and Stage 1 Safety Audit has been submitted of these mitigation proposals. A designers response to the safety audit will also be required. The plan needs to be submitted at a 1:500 scale.
- A2070 Bad Munstereifel Road / Romney Marsh Road / Malcolm Sargent Road. The proposals will impact very significantly on this roundabout in a 2030 + Committed + Development scenario when compared to the 2030 + Committed scenario with the queue worsening by 18 vehicles and 26 seconds on the Bad Munstereifel Road arm and 157 vehicles and 6 and half minutes on the Romney Marsh Road south arm in the AM peak. In the PM peak Romney Marsh Road north arm queue will worsen by 29 vehicles and 50

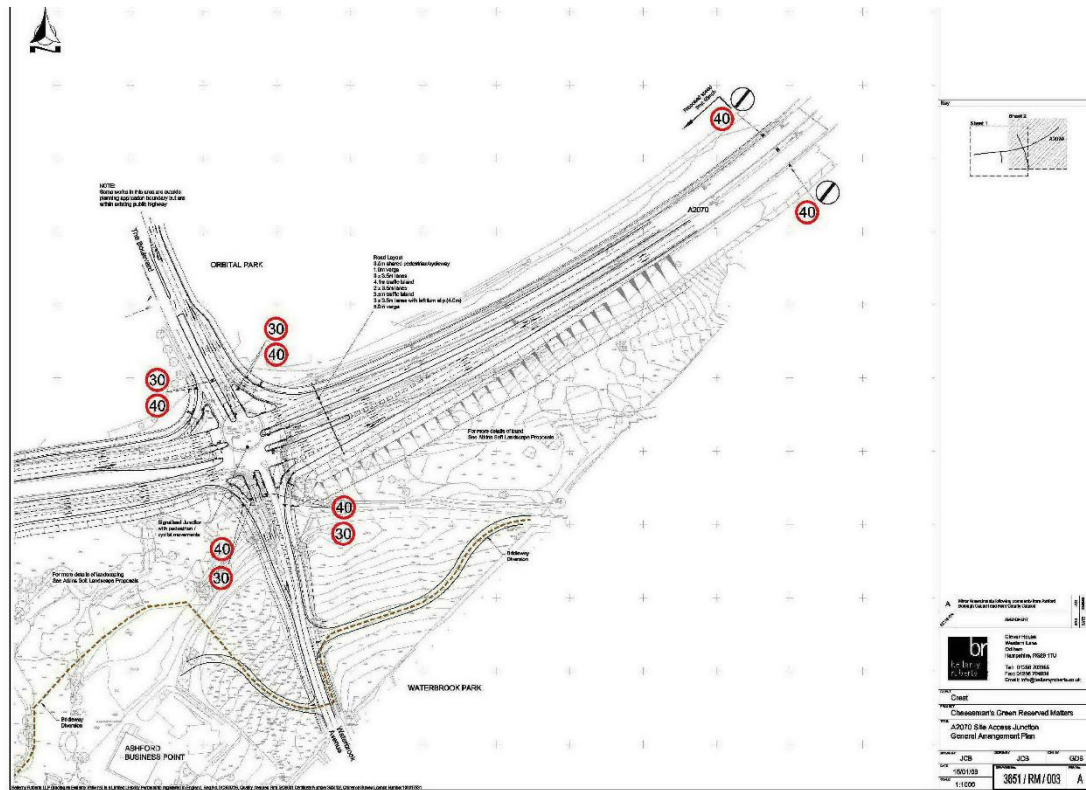
seconds, Bad Munstereifel Road arm queue will worsen by 38 vehicles and 54 seconds and Malcolm Sargent Road arm queue will worsen by 2 vehicles and 7 seconds. A mitigation scheme is proposed by the applicant which will increase the entry widths on all arms of the roundabout to improve capacity here. However no plan and Stage 1 Safety Audit has been submitted of these mitigation proposals. Nonetheless this roundabout junction currently has a poor safety record and this would have been shown up if the applicant had undertaken a crash data search of this roundabout. To address this issue the County Council is looking at a radical design solution for this roundabout in the form of a TURBO roundabout but currently does not have the funds to complete a scheme here. The applicant is therefore requested to cost their mitigation proposals and the Highway Authority will request that a Section 106 contribution equivalent to the cost of this scheme is secured towards the cost of delivering this TURBO roundabout scheme.

- Ashford Road / Romney Marsh Road / Forestall Meadow. It does not appear that the sensitivity test has been undertaken for this roundabout junction. The proposals will impact fairly significantly on this roundabout in a 2030 + Committed + Development scenario when compared to the 2030 + Committed scenario with the queue worsening by 7 vehicles and 19 seconds on the Ashford Road South arm and 3 vehicles and 14 seconds on the Ashford Road north arm in the AM peak. A mitigation scheme is proposed by the applicant which includes improvements to the southern and western arms. However no plan and Stage 1 Safety Audit has been submitted of these mitigation proposals. A designers response to the safety audit will also be required. The plan needs to be submitted at a 1:500 scale.
- Ashford Road / Pound Lane / Church Hill Junction Signalisation - As discussed above pedestrian phases need to be built in the LINSIG model and the capacity assessment re-run accordingly.

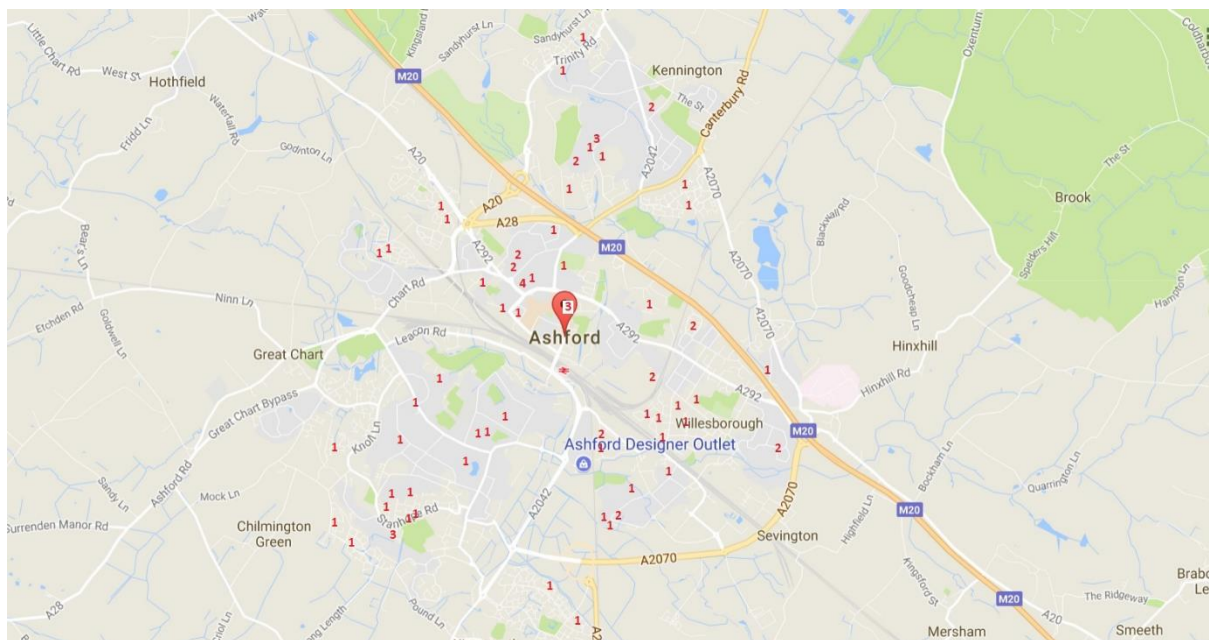
Schedule of Commitments

KCC Highways and Transportation do not have the capacity to deliver highway improvements that are as a result of development proposals. Therefore the following works should be secured through a Section 278 Agreement rather than a contribution under Section 106 apart from one of the schemes as discussed below.

- Capacity improvement to Romney Marsh Road / Norman Road / Kimberley Way roundabout.
- Capacity improvement to A2070 Bad Munstereifel Road / Romney Marsh Road / Malcolm Sargent Road roundabout. As discussed above a Section 106 Agreement is acceptable. Nonetheless, KCC Highways and Transportation do not agree to the trigger point of payment by Area 3 and 4 due to the significant impact of these proposals on the roundabout as discussed above. The trigger should be Area 2 or by the 151st dwelling.
- Capacity improvement to Ashford Road / Romney Marsh Road / Forestall Meadow roundabout.
- It appears that some of the table has not been updated since the original Transport Assessment was submitted as it refers to a new roundabout at the junction of Ashford Road / Magpie Hall Road / Steeds Lane. Ashford Road is also currently not being proposed to be re-aligned.
- All dwellings should have an electric charging point installed and this should be subject to a planning condition.
- A Section 106 contribution of £5,000 as stated in the monitoring section is required so that KCC Highways and Transportation can monitor the proposed travel plan.
- No details of the proposed car club have been submitted together with the best location of it.



The Bellamy Gurner Junction to replace the orbital roundabout on the A2070



Spatial distribution of those on allotment waiting list in 2017