

ASHFORD LOCAL PLAN EXAMINATION HEARING STATEMENT IN REPECT OF ISSUE 11 HALLAM LAND MANAGEMENT LIMITED

Issue 11: Are the strategic transport schemes referred to in Policy TRA1 justified and will they be delivered in a timely fashion so as to facilitate growth and environmental benefits?

ii. What would the benefits of the Pound Lane Link Road? What is the latest position regarding its delivery? Is the development of Sites S3, S4 and S5 dependent on this and is any connection adequately expressed in site allocation policies?

1. Introduction

- 1.1 Hallam Land Management Limited (referred to hereafter as Hallam) control the land identified in the Submission Version of the Local Plan as the strategic allocation at Court Lodge (Site S3), which is to provide approximately 950 dwellings and uses associated with growth at South Ashford.
- 1.2 The Court Lodge site is one of three allocations to the South of Ashford, which together are to provide 1500 new homes to meet the plan's housing requirement.
- 1.3 Policy TRA1 identifies the Pound Lane Link Road as one of the Strategic Transport Schemes which the Council will seek to implement. Hallam does not object to the principle of the Pound Lane Link Road in this Policy. However, we do not consider that the references to how this transport scheme is related to development at Court Lodge is "justified" as required by the tests of soundness.
- 1.4 Paragraph 5.235 of the Submission Version of the Plan states that "*this Link is critical to the full deliver of the proposed allocation at Court Lodge (Site S3)*". Neither the Council nor the Highway Authority have produced evidence that substantiates this.
- 1.5 Therefore, whilst the construction of the Pound Lane Link Road is not a condition precedent to development at Court Lodge, detailed highway modelling as part of a Transport Assessment could establish that the development can be accommodated through other highway improvements. This is subject to on-going work involving the Borough Council, Kent County Council as Highway Authority, and the promoters of Sites S3, S4 and S5. Critically, this is considering the cumulative effects of the developments proposed to the south of Ashford in the context of paragraph 32 of the NPPF.

2. The function of the Pound Lane Link Road

- 2.1 The function of the Pound Lane Link Road is explained in a number of documents.
- 2.2 In 2016, Ashford Borough Council/Kent County Council commissioned a Feasibility Study entitled 'Kingsnorth Strategic Link Road Ashford'¹. This explains that the Local Plan process has

¹ TDB01

identified a number of sites available to be developed to the south of Ashford, particularly in the Kingsnorth area. It goes on to state that the ability of the local existing infrastructure to sustain increases in traffic resulting from the potential development in the Kingsnorth area has led to the need to consider a possible additional highway link to the west of Kingsnorth. Based on this rationale, the Feasibility Study provided a route study to examine the deliverability of a link between Pound Lane and Kingsnorth Road.

- 2.3 References to the Pound Lane Link Road within the Submission version of the Local Plan are in the context of providing additional highway capacity to enable traffic arising from the new allocations to the south of Ashford and Chilmington Green to be distributed across the highway network, consistent with the above rationale in the Feasibility Study, as evidenced by the following references:
- 2.4 In its response to the Representations submitted to the Regulation 19 Plan, the Council state that *“The Pound Lane Link Road is proposed in the plan as a strategic road link to service sites S3, S4 and S5 thereby relieving pressure on surrounding roads. Impacts on the road network has been taken into account. Developer contributions will be used as required”*²
- 2.5 Paragraph 4.37 of the Submission version of the Local Plan refers to a new ‘strategic route’ from Long Length to Pound Lane and then via the Pound Lane Link Road to the Forestall Meadow roundabout at the entrance to the Park Farm development linking with the A2070. Paragraph 5.235 expands this by referring to this as an opportunity to provide an addition vehicular link for traffic from the Chilmington urban extension to the A2070 trunk road and M20 junction 10/10a.
- 2.6 However, the Chilmington urban extension was granted planning permission in February 2017 and the Section 106 planning obligation does not include financial contributions to the Pound Lane Link Road. Moreover, despite the justification given by the Council as to the role of the Pound Lane Line Road in supporting development of Sites S4 and S5, the Local Plan is not seeking financial contribution from these sites. These Policies are not therefore “effective” in contributing towards the implementation of TRA1 if the need for the Pound Lane Link Road is proven to be necessary to mitigate the traffic impacts of development to the South of Ashford. Policies S4 and S5 would need to be modified accordingly to correspond with the expression in S3 for financial contributions.

3. Alternative Proposition

- 3.1 In 2017, Hallam’s transport consultants undertook a traffic impact assessment, the purpose of which was to establish what traffic impact development at Court Lodge has on both the local and strategic road network in both ‘with and without’ Pound Lane Link Road scenarios.
- 3.2 This traffic modelling exercise identified the following results:

² SD05, Page 271

- In the ‘with Pound Lane Link Road’ scenario, a total of four junctions within the local highway network will require improvement works.
 - In the ‘without Pound Lane Link Road’ scenario, a total of five junctions within the local highway network will require improvement works.
 - In both scenarios, none of the strategic network junctions require improvement.
- 3.3 The assessment indicated that all of the junctions identified in the study area either operate within capacity thresholds or that a nil-detriment highway improvement can be delivered, without the need to deliver the Pound Lane Link Road. The results indicate that the highway improvements will be required irrespective of the Pound Lane Link Road, save for one additional junction in the ‘without’ scenario.
- 3.4 It is acknowledged that the assessment that has been carried will be subject to inclusion within a full Transport Assessment in support of any emerging Planning Application and will need to evidence that journey times through across the relevant part of the network will not be severely affected. However, the results already defined through the assessment show that mitigation is possible and viable without the Pound Lane Link Road.
- 3.5 Hallam are aware that, in response to the planning application submitted by Pentland Homes and Jarvis Homes for development at Kingsnorth Green (Sites S4 and S5)³ Kent County Council have made the following comment:
- Area 1⁴ - 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 [sic] 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.
(KCC, 5th January 2018)
- 3.6 As indicated above, the work to determine the access strategy for the three sites is being refined presently. In the event all parties agree that the development of these sites does not require additional highway capacity provided by the Pound Lane Link Road, then the need for financial contributions towards it would fall away. Policy S3 can be modified accordingly and Policies S4 and S5 would not need to be amended.
- 3.7 However, and recognising that the Council would want to maintain the ability for the Pound Lane Link Road to be constructed in the future, Hallam would safeguard land to allow the

³ 15/00856

⁴ Area 1 is Site S5 land South of Pound Lane



connection to Pound Lane to be upgraded in order to enable the strategic route to operate as intended by the Local Plan.

LRM Planning Limited
26th March 2018