

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

26th March 2018

183987/N01

Introduction

1. Vectos has been commissioned by Canon Woods and Orchard Action Group to consider the transport implications of the proposed residential allocation within the emerging Ashford Local Plan and the transport infrastructure that would be required to support this allocation for 700 residential units.
2. This statement builds upon the Regulation 19 representations made JB Planning Associates on draft Policy S2, relating to the transport aspects of the proposed allocation, including the timely delivery of Junction 10a.
3. It has been prepared in the context of the question that the Inspectors have raised for the Examination. In particular, Issue 11 which includes the following questions:-

Issue 11:

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

i) Is it realistic to expect that the Junction 10a scheme will be completed and open to traffic in August 2019? Would these improvements provide adequate capacity for the development anticipated during the plan period and beyond? Is it reasonable to require financial contributions to be made as part of a number of the site allocation policies if the work is already funded? Are suitable safeguards in place to ensure adequate capacity is in place before occupation of new development occurs?

4. This will be discussed in more detail below including how the emerging Local Plan will need to be amended to reflect the current programme for the improvement scheme at J10a.

Issue 12: (for Council responses only)

Are the site allocations justified and deliverable or developable within the plan period having regard to any constraints and consistent with national policy? Is there sufficient detail on form, scale, access and quantum?

ix) Which infrastructure is critical to the delivery of the individual site? Where contributions are specified, are they necessary and justified by the evidence base?

x) Do the allocations contain sufficient detail, particularly with regard to the contributions required for community uses or infrastructure, and have all of the expectations in the supporting text been adequately reflected in the policy itself?

xi) Have the individual and cumulative transport related implications of allocated sites been fully assessed and are measures to address them sufficiently clear and deliverable?

xiii) Are allocated sites in accessible locations with good access to everyday facilities by a range of means of transport? Does the Plan provide an adequate basis to address any areas of deficiency?

5. In line with the Inspectors' guidance these questions are not specifically addressed, but this statement considers some of the issues raised, a number of which cannot be answered in sufficient detail in relation to the proposed allocation of Land North of Willesborough Road (Policy S2).

Background

**Ashford Local Plan 2030 – Submission Version (Dec 2017) – Local Plan Examination
Reference SD01**

6. Policy S2 contains a number of infrastructure requirements and those related to transport are listed below:-

“Policy S2 - Land north-east of Willesborough Road, Kennington

Land to the north-east of Willesborough Road, Kennington, is proposed for residential development with an indicative capacity of 700 dwellings... The masterplan shall be developed taking into account the following:

c) Primary access to the site shall be provided from Willesborough Road, with the location of a secondary/emergency access to be determined following further investigation into the feasibility of access onto the Canterbury Road, in liaison with the Local Highways Authority;

d) New pedestrian and cycle routes are to be provided throughout the development with connections to existing routes. The PRowS running through the site should be maintained and incorporated within the development, where possible. Proposals must investigate, and deliver, if feasible, a pedestrian and cycle bridge crossing over the railway line to replace the existing at-grade pedestrian crossings, and maintain the PRow and provide access into the country park;

In addition, the development shall:

i. Make improvements to the local road network, where necessary and achievable, informed by a Transport Assessment carried out in liaison with KCC Highways and Transportation.

ii. Provide a proportionate financial contribution to the delivery of Highway England's scheme for a new M20 Junction 10a.

iii. Provide a financial contribution to the extension of existing bus services in the area to serve the development.

iv. Provide a proportionate contribution towards primary education to contribute towards the delivery of the primary school on site.

v. Ensure that any land contamination issues are satisfactorily resolved or mitigated.....

No occupation of the residential element of the development shall take place until the proposed M20 Junction 10a is complete, in accordance with Policy TRA1."

7. As an overview observation it is noted that there is some detail provided in the draft Policy for infrastructure requirements which are set out in the alphabetical list. However, the majority of transport related infrastructure requirements are listed separately with no detail given and with further work being needed at the planning application stage.
8. While the level of detail at the stage of a planning application will be greater than at the stage of allocating a site in a Local Plan there does need to be certainty when an allocation is made that the infrastructure requirements to support the allocation can be met in a timely fashion, including that where funding is sought from the development of the proposed allocation that the package of improvements and measures for all infrastructure is affordable. If this is not the case then the allocation cannot be sound as it is not 'effective'.

Infrastructure Delivery Plan 2017 (IDP) – Local Plan Examination Reference SD10

9. While the IDP considers transport as a theme it only identifies strategic infrastructure improvements. It fails to consider the proposed allocation sites in any detail and does not clearly set out the infrastructure requirements for each allocated site to allow consideration of whether these requirements would be affordable where funding is being sought from proposed developments.
10. In Section 3 of the IDP the Council's Infrastructure Delivery Schedule is set out with some specific transport scheme mentioned. For example, J10a is the first scheme listed and the funding sources are identified. The identified cost of the scheme is £104m and the total funding is £105.7m made up of £19.7m from Local Growth Funding, £16m from existing S106 and future S278 agreements and £70m from Highways England. While this demonstrates that funding is available for the scheme there is some uncertainty as some of this is stated to be from future S278 agreements. No detail is given on the estimated value of these future agreements and the proposed development this source of funding will be sought from. Some uncertainty remains.

11. There are two improvement schemes where the proposed allocation S2 is mentioned as a proposed development that is specifically stated to be one of the reasons for the improvements being needed. The first is the A2070 Conningbrook Bends that is listed as essential, but it is stated that this scheme is completed and that no funding is needed.
12. The second is Pedestrian Bridge over railway line at Kennington/Conningbrook that is listed as a desirable. The cost is identified as being in excess of £1m, with the sources of funding being Network Rail and developments. No further detail is given anywhere else in the IDP.
13. There is no consideration given to the need for improvements to local roads around the proposed allocated sites or to how these sites would be made accessible for all modes of transport including pedestrians, cyclists and by public transport. The only comments being made in the IDP under Theme 1: Transport being:-

“Site specific mitigation – it is also expected that individual site allocations will bring forward site specific mitigation on the local road network, through the provision of site specific Transport Impact Assessments”
14. In terms of bus services:-

“The Council promotes the use of sustainable forms of transport, and bus provision forms an integral part of this. Major development in the Local Plan has been planned to take account of existing provision, where there is existing provision in place or this can be easily upgraded/extended or improved.

Improvements in bus services will be required to be delivered alongside new development, the details of which will expect to be agreed at an early stage of the development process when planning applications are being considered. Contributions will be expected towards start-up funding for improved or new services.”
15. It would have been expected for strategic sites as part of the evidence base for the Local Plan to demonstrate that the infrastructure requirements have been fully identified, are feasible and can be funded and delivered. Examples of this include the identification of which junctions on local roads need improvement and how new or extended bus services will serve strategic developments. Without this evidence there is no certainty that the proposed allocations can be delivered within the period covered by the Local Plan.
16. The IDP does not provide sufficient detail for the proposed strategic development allocations to provide certainty that the required infrastructure can be delivered.

Traffic Impact Assessment Summary Report (March 2016) – Local Plan Examination Reference TBD02
17. This document considers the following junctions in relation to the Land to the North of Willesborough Road:-
 - A2042 Canterbury Road/ A28 Simone Weil Avenue;
 - A2042 Canterbury Road/ Bybrook Road;
 - A28 Canterbury Road/ A2042 Faversham Road/ George Williams Way;

- A28 Canterbury Road/ Willesborough Road;
18. The report concludes that at the end of the Local Plan period (as assessed in this report) that all of these junctions would be over capacity and states: ***“In order to provide for the proposed future development, alternative junction configurations should be investigated.”*** This work has not been undertaken.
19. While it is accepted that the detailed design of improvement schemes at these junctions would usually be undertaken at the planning application stage as part of a detailed Transport Assessment there needs to be certainty when a site is allocated for development that any required improvements are feasible i.e. there must be certainty that the junctions can be improved. This has not been undertaken and does not form part of the evidence base for the emerging Local Plan.

Transport Infrastructure Requirements

M20 J10a

20. It is stated in Policy S2 that this scheme must be completed prior to the occupation of any residential developments on the Land to the North of Willesborough Road.
21. The proposed new junction is an improvement to the strategic highway network and it is appropriate that it is identified in the emerging Local Plan. There is reasonable certainty that the new junction will be delivered as the DCO is in place, funding is in place, a contract has been let and have commenced. It is also clear in Policy S2 that residential occupation cannot take place until the new junction is completed.
22. However, the Local Plan does need to reflect the up to date position as it currently states that the scheme will be completed in August 2019 while the Highway England website report that this will be May 2020. There also needs to be some allowance for potential slippage of the programme on such a large infrastructure project.
23. This does not affect the transport benefits of this scheme which addresses development impacts on the strategic road network, but consideration will need to be given to the timing of some developments in terms of housing delivery as a result of this scheme not been delivered until May 2020 at the earliest.
24. The second area of uncertainty is funding and whether additional funding is needed or can be sought from future developments. As the contract has been let funding is clearly in place and therefore further funding should not be collected from future development. The benefits of this is that this means that there would be additional funding for the necessary improvements of local roads.

Vehicular Access

25. For a development of 700 residential units and a primary school there would be an anticipation that there would be two vehicular accesses to the site or at least one vehicular access and an emergency access.

26. There is no certainty on whether an appropriate access to site S2 can be provided. While it is not disputed that an access to Willesborough Road could be provided the implications of such an access on road safety and peak period traffic flows needs to be considered.
27. There is uncertainty about the potential for an access onto Canterbury Road as set out in the pre-amble to Policy S2. It is stated that this could be an access to a limit number of houses or as an emergency access. This means that the majority of traffic to/from the site would use Willesborough Road which further emphasises why the evidence base for the Local Plan should include an assessment of the implications of this to ensure it can be achieved.

Local Roads

28. In the pre-amble to Policy S2 it is acknowledged that there will be an impact of the proposed allocation on the wider road network. This reflects the outcome of the Traffic Impact Assessment (TBD02) that forms part of the Local Plan Evidence Base.
29. However, no further work has been undertaken to show that the junctions considered in the Traffic Impact Assessment (TBD02) can be improved to accommodate the additional traffic associated with the proposed allocation or whether alternative improvements and measures can be undertaken to mitigate the impacts at the junctions. Sufficient work should form part of the evidence base for the Local Plan to give certainty that such improvements or mitigation can be undertaken with the period covered by the Local Plan.
30. No further work has been undertaken on how buses would serve the site through either new or extend services and how pedestrian and cycle access to the site will be provided to key local facilities such as secondary schools, shops and employment opportunities.
31. There remains uncertainty that an appropriate mitigation package can be provided in association with the proposed allocation to ensure that the impacts on the local road network can be mitigated. This is reflected in the wording of Policy S2 where this work is left to the planning application stage.

Accessibility

32. In a similar way to the consideration of the impacts on local roads arising from the proposed allocation, the accessibility of the site for pedestrians, cyclists and by bus has not been considered in sufficient detail. The proposed allocation needs to be accessible by all modes of transport and this would also contribute to reducing traffic impacts on local roads.
33. There is mention in the pre-amble to Policy S2 about the new bridge over the railway that is listed in the Infrastructure Delivery Schedule of the IDP (SD10). It is stated that:-

“There are two public rights of way running east-west across the site. One provides an at grade pedestrian crossing over the railway line into the Conningbrook Country Park. The other diverts north to meet a further public right of way which runs just beyond and along the northern boundary of the site, and provides a further at-grade pedestrian crossing over the railway line. Given the proposed scale of development here, combined with that at

Conningbrook means that considerable additional use of the at-grade crossings could be expected. Network Rail has advised that due to the increased risk, the existing at-grade crossings will need to be closed at the time of the development. The Council's preferred solution would be to provide a new pedestrian / cycleway bridge over the railway in order to provide safer access into the Country Park from the site and wider area. Therefore, proposals for the development of the site must fully investigate the potential for it to deliver a new single bridge crossing over the railway line, with the intention of retaining the PRowS as far as possible."

34. Given the importance of the link over the railway line that this is included in the IDP (SD10) and the potential safety implications if it is not provided then it should be a specific requirement in the policy and not left as an aspiration in the pre-amble to the policy.
35. One of the main ways to address transport implications is both to manage the demand for transport by ensuring appropriate facilities are provided and to encourage the use of non-car modes of transport. This is undertaken in a number of stages: firstly, ensuring that any new development is close to or provide local facilities that are easily accessible. Secondly, to ensure good pedestrian and cycle routes and as appropriate bus services to these facilities. Thirdly, to provide good cycle routes and bus services to facilities a greater distance from the site.
36. These aspirations should be included in a Travel Plan and/or a Residential Travel Plan and a School Travel Plan (for the proposed primary school). The production of Travel Plans should be a requirement of the policy.

Summary and Conclusions

37. As demonstrated above there remains uncertainty about whether the transport infrastructure required to support the proposed allocation in Policy S2 can be provided.
38. There are a number of amendments that need to be made to the policy, but more fundamentally the evidence base for the Local Plan is not sufficiently detailed to give the certainty required to allocate the Land North of Willingsborough Road as a strategic residential allocation.
39. While it is acknowledged that detailed work would be required to support a planning application, sufficient work needs to be done at this stage to support the proposed allocation by demonstrating that the required infrastructure (both new facilities and improvements) can be delivered.
40. Without this further work forming part of the evidence base then it is not considered sound to allocate the site as a strategic residential allocation.