

PLANNING APPLICATIONS COMMITTEE

Wednesday, 13th January, 2021

10.00 am

Online





AGENDA

PLANNING APPLICATIONS COMMITTEE

**Wednesday, 13th January, 2021, at 10.00
am
Online**

Ask for: **Andrew Tait**

Telephone: **03000 416749**

Membership (13)

- Conservative (10): Mr R A Marsh (Chairman), Mr R A Pascoe (Vice-Chairman), Mr M A C Balfour, Mrs R Binks, Mr A Booth, Mr A H T Bowles, Mr P C Cooper, Mr H Rayner, Mr C Simkins and Mr J Wright
- Liberal Democrat (1): Mr I S Chittenden
- Labour (1) Mr J Burden
- Independents (1) Mr P M Harman

In response to COVID-19, the Government has legislated to permit remote attendance by Elected Members at formal meetings. This is conditional on other Elected Members and the public being able to hear those participating in the meeting. This meeting of the Cabinet will be streamed live and can be watched via the Media link on the Webpage for this meeting.

Representations by members of the public will only be accepted in writing. The transcript of representations that would normally be made in person will be provided to the Clerk by 12 Noon two days ahead of the meeting and will be read out by the Clerk of the meeting at the appropriate point in the meeting. The maximum length of time allotted to each written representation will be the 5 minutes that it takes the Clerk to read it out.

UNRESTRICTED ITEMS

(During these items the meeting is likely to be open to the public)

A. COMMITTEE BUSINESS

1. Substitutes
2. Declarations of Interests by Members in items on the Agenda for this meeting.
3. Minutes - 9 December 2020 (Pages 1 - 4)
4. Site Meetings and Other Meetings

B. GENERAL MATTERS

1. General Matters

C. MINERALS AND WASTE APPLICATIONS

D. DEVELOPMENTS TO BE CARRIED OUT BY THE COUNTY COUNCIL

1. Proposal DOV/20/01048 (KCC/DO/0178/2020) - Creation of two sectors of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only. Section 1 - New road, 1.0 km in length, connecting Whitfield Urban Expansion to Tesco roundabout at Honeywood Parkway via new overbridge over A2. Access to bridge will be controlled by bus gates. Section 2 - New road, 1.1 km in length connecting B & Q roundabout on Honeywood Park Road to Dover Road near Frith Farm, with access to Dover Road controlled by a bus gate, providing access to future phases of White Cliffs Business Park at Dover Fastrack - Land to the north of Dover and to the south of Whitfield; KCC Major Capital Projects (Pages 5 - 68)

E. MATTERS DEALT WITH UNDER DELEGATED POWERS

1. County matter applications (Pages 69 - 72)
2. County Council developments
3. Screening opinions under Town and Country Planning (Environmental Impact Assessment) Regulations 2017
4. Scoping opinions under Town and Country Planning (Environmental Impact Assessment) Regulations 2017

F. KCC RESPONSE TO CONSULTATIONS

1. Proposal TM/20/02249/EASP - Request for Scoping Opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017: Outline planning application for a residential- led development at Broadwater Farm, West Malling - KCC's response as Highway Authority to Tonbridge and Malling BC (Pages 73 - 76)
2. Proposal TM/20/01820/OAEA - Outline Application: Hybrid planning application for the following development: Outline planning permission (all matters reserved) for the erection of flexible B1c/B2/B8 use class buildings and associated access, servicing, parking, landscaping, drainage, remediation and earthworks; and Full planning permission for erection of two warehouse buildings for flexible B1c/B2/B8 use class, realignment of Bellingham Way link road, creation of a north/south spine road, works to the embankment of Ditton Stream, demolition of existing gatehouse and associated servicing, parking, landscaping, drainage, infrastructure and earthworks at Aylesford Newsprint, Bellingham Way, Larkfield, Aylesford; KCC's response as Highway Authority to Tonbridge and Malling BC (Pages 77 - 84)

3. Proposal - Hybrid application for outline permission for provision of up to 2000 residential units (including up to 100 Extra Care units), care home (Use Class C2), two form entry primary school (Use Class F.1(a)), health facility (Use Class E(e)) and mixed use centre (Use Classes E(a-g), Sui Generis (drinking establishments and hot food takeaways)/C2/C3/F.1(a-g) and F.2 (ad), with vehicular access onto Dent de Lion Road, Garlinge High Street, Minster Road, Shottendane Road, Briary Close, Victoria Avenue, Belmont Road, and Brooke Avenue, along with new Primary Route Corridors between Shottendane Road and Minster Road and Shottendane Road and Dent De Lion Road, with all matters reserved, except access with; Full application for the erection of 120 residential units (within Class C3) forming Phase 1 including parking, access, landscaping, equipped play area, and other associated works at Land South Of Westgate And Garlinge, Margate - KCC's response as Highways Authority to Thanet DC (Pages 85 - 96)
4. Otham Neighbourhood Plan Regulation 16 - KCC's response to Maidstone BC (Pages 97 - 102)
5. Cranbrook and Sissinghurst Neighbourhood Plan Pre-submission Regulation 14 - KCC's response to Tunbridge Wells BC (Pages 103 - 112)
6. Benenden Parish Neighbourhood Development Plan 2020-2036 Regulation 16 - KCC's response to Tunbridge Wells BC (Pages 113 - 120)
7. Lamberhurst Parish Neighbourhood Development Plan 2016-2036 Regulation 16 - KCC's response to Tunbridge Wells BC (Pages 121 - 126)
8. Gravesham Local Plan - Emerging Local Plan Partial Review, Site Allocations and Development Management Policies Regulation 18(2) - KCC's response to Gravesham BC (Pages 127 - 174)
9. Maidstone Local Plan - Regulation 18 (2) Local Plan Review Preferred Approaches Consultation December 2020 - KCC's response to Maidstone BC (Pages 175 - 210)

G. OTHER ITEMS WHICH THE CHAIRMAN DECIDES ARE URGENT

EXEMPT ITEMS

(At the time of preparing the agenda there were no exempt items. During any such items which may arise the meeting is likely NOT to be open to the public)

Benjamin Watts
General Counsel
03000 416814

Tuesday, 5 January 2021

(Please note that the draft conditions and background documents referred to in the accompanying papers may be inspected by arrangement with the Departments responsible for preparing the report.)

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KENT COUNTY COUNCIL**PLANNING APPLICATIONS COMMITTEE**

MINUTES of a meeting of the Planning Applications Committee held in the Online on Wednesday, 9 December 2020.

PRESENT: Mr R A Marsh (Chairman), Mr R A Pascoe (Vice-Chairman), Mr M A C Balfour, Mrs R Binks, Mr A Booth, Mr A H T Bowles, Mr J Burden, Mr P C Cooper, Mr P M Harman, Mr H Rayner, Mr C Simkins and Mr J Wright

IN ATTENDANCE: Mrs S Thompson (Head of Planning Applications), Mr J Wooldridge (Principal Planning Officer - Mineral Developments), Mr C Finch (Senior Projects Officer - CAIP East Kent) and Mr A Tait (Democratic Services Officer)

UNRESTRICTED ITEMS**51. Minutes - 4 November 2020**

(Item A3)

RESOLVED that the Minutes of the meeting held on 4 November 2020 are correctly recorded and that they be signed by the Chairman.

52. Site Meetings and Other Meetings

(Item A4)

The Head of Planning Applications briefly informed the Committee that it was still not possible for the Committee to undertake a site visit to Covers Farm, Westerham in the light of the current Covid-19 pandemic.

53. General Matters

(Item B1)

The Head of Planning Applications informed the Committee of the consultation by the Ministry of Housing, Communities and Local Government on *Supporting Housing Delivery and Public Service Infrastructure*. The Committee agreed to hold an informal briefing in January 2021, to which the Cabinet Member for Economic Development would be invited, with the aim of improving understanding of the issues involved and contributing to the response.

54. Application SW/20/500291 (KCC/SW/0008/2020 - Construction and operation of an Incinerator Bottom Ash (IBA) recycling facility at Plot 6B, Ridham Dock Estate, Iwade; Fortis IBA Ltd

(Item C1)

(1) The Head of Planning Applications presented a revision to her recommendations whereby they would not be subject to any late objections by Natural England to the application or to KCC's Habitat Regulations Assessment which were incapable of being satisfactorily resolved by the Head of Planning Applications following the meeting. This was agreed.

(2) In unanimously agreeing the revised recommendations, the Committee included an additional Informative encouraging the use of waterborne transportation wherever possible.

(3) RESOLVED that:-

- (a) permission be granted to the application subject to conditions, including conditions covering the prior approval and implementation of a Construction Environmental Management Plan (CEMP) to address potential adverse impacts during the construction phase (including those relating to highways, noise and air quality / dust); a Travel Plan (to promote HGV movements outside the peak periods); no HGVs associated with the delivery of Incinerator Bottom Ash Aggregate (IBA) to the site entering or leaving the site on weekdays between 0730 and 0930 hours and between 1630 and 1830 hours other than from the Kemsley Sustainable Energy Plant (SEP); no more than 6 HGVs associated with the delivery of IBA Aggregate (IBAA) or metals from the site entering or leaving the site (i.e. 6 in / 6 out) on weekdays between 0700 and 0930 hours and none between 1630 and 18:30 hours (excluding those taking IBAA to Ridham Dock for export by barge); all HGVs entering and leaving the site via the Western Access Route prior to the completion and opening of the Grovehurst Junction improvements unless delivering IBA to the site from the Kemsley SEP; no more than 310,000 tonnes of IBAA and metals being exported by road from the site in any 12 month period; no more than 165,500 tonnes of IBA being imported to the site by road from sources other than the Kemsley SEP in any 12 month period; records being kept and made available to KCC to demonstrate compliance with the above restrictions; the surfacing of the site access being maintained in a good state of repair and kept clean and free of mud and other materials at all times; measures being taken to ensure that vehicles leaving the site do not deposit mud or other materials on the public highway (including by use of wheel and chassis cleaning equipment as necessary); all loaded, open backed vehicles entering or leaving the site being properly enclosed or sheeted; measures to minimise air quality (including dust) impact; no piling works between November and February (inclusive) (or piling works only being carried out between the months of March to October (to avoid the core winter period of November to February)), if piling is necessary at all; lighting being installed, used and maintained in accordance with the applicant's lighting design strategy to avoid light spillage onto adjoining areas to ensure that any light spillage does not exceed 0.5 Lux; the removal of permitted development rights to ensure that no additional buildings, plant or machinery are erected or installed on site unless approved beforehand by KCC; the prior approval by KCC of all ancillary buildings; the removal of all IBA, IBAA, metals or other materials, buildings, plant and machinery from the site within 2 years of the permanent cessation of the IBA Recycling Facility; the operational layout of the site being as proposed; stockpile heights of IBA and IBAA being restricted to no more than 10m; the processing plant being coloured and maintained in light grey; the implementation of a remediation strategy in the scenario in which unexpected

contamination is encountered during development of the site; no surface, process or foul water being discharged from the site; and a flood evacuation plan; and

- (b) the applicants be advised by Informative that:-
- (i) for the purposes of the highway restrictions which refer to the Kemsley Sustainable Energy Plant (SEP), this shall be taken to be the consented K3 SEP and any permissions that may be granted for the K3 SEP expansion and Wheelabrator Kemsley North (WKN) via the current DCO process;
 - (ii) the Travel Plan must include sufficient detail regarding how it will be implemented and its effectiveness monitored and contain details of the mechanisms to be used to review the Plan and introduce amended and / or new actions to achieve the stated intentions if monitoring suggests its intentions are not being achieved;
 - (iii) in accordance with Government Guidance, detailed controls in respect of emissions will be matters for the Environment Agency under the terms of the Environmental Permit and that any new development at the site and / or changes in operational procedures must be in accordance with the Environmental Permit; and
 - (iv) they are encouraged to use waterborne transport wherever possible.

55. Matters dealt with under delegated powers

(Item E1)

RESOLVED to note matters dealt with under delegated powers since the last meeting relating to:-

- (a) County matter applications;
- (b) County Council developments;
- (c) Screening Opinions under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017; and
- (d) Scoping Opinions under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (None).

56. KCC Response to Consultations

(Item F2)

(1) Mr J Burden asked the Committee to note that although he supported KCC's response to the Planning for the Future White Paper (Item F2) in respect of its comments in response to Question 8(a), he nevertheless considered as a Member of Gravesham BC agreed with the housing requirements in his Borough.

(2) Mr A H T Bowles asked the Committee to note his opposition to the housing requirements in the Borough of Swale.

(3) The Committee recorded its appreciation for the work of Sarah Platts in preparing an excellent and comprehensive response to the consultation.

(4) RESOLVED:-

(a) to note Kent County Council's responses to the following consultations:-

(i) Outline Application at Former Broke Hill Golf Course, Stonehouse Park, Sevenoaks Road, Halstead;

(ii) Response to the *Planning for the Future* White Paper;

(iii) Otham Parish Neighbourhood Plan 2020 to 2035 – Regulation 16 Consultation; and

(iv) Boughton Aluph and Eastwell Parishes' Neighbourhood Plan 2013 to 2030 – Regulation 16 Consultation; and

(b) that Sarah Platts be thanked for preparing an excellent and comprehensive response to the consultation on *the Planning for the Future* White Paper.

SECTION D
DEVELOPMENT TO BE CARRIED OUT BY THE COUNTY COUNCIL

Background Documents: the deposited documents; views and representations received as referred to in the reports and included in the development proposals dossier for each case; and other documents as might be additionally indicated.

Item D1

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only. Section 1 - New road, 1km in length, connecting Whitfield Urban Expansion to Tesco roundabout at Honeywood Parkway via new overbridge over A2. Access to bridge will be controlled by bus gates. Section 2 - New road, 1.1km in length, connecting B & Q roundabout on Honeywood Parkway to Dover Road, near Frith Farm, with access to Dover Road controlled by a bus gate. Providing access to future phases of White Cliffs Business Park at Dover Fastrack - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

A report by Head of Planning Applications Group to Planning Applications Committee on 13th January 2021.

Application by Kent County Council for Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only. Section 1 - New road, 1km in length, connecting Whitfield Urban Expansion to Tesco roundabout at Honeywood Parkway via new overbridge over A2. Access to bridge will be controlled by bus gates. Section 2 - New road, 1.1km in length, connecting B & Q roundabout on Honeywood Parkway to Dover Road, near Frith Farm, with access to Dover Road controlled by a bus gate. Providing access to future phases of White Cliffs Business Park at Dover Fastrack - Land to the north of Dover and to the south of Whitfield, Kent

Recommendation: Permission be granted subject to conditions.

Local Member: Mr Geoff Lymer

Classification: Unrestricted

Site

1. The application site is made up of two distinct areas referred to as Section 1 and Section 2 for the purposes of the planning application and in total comprises an area of 15.5 hectares and lies approximately 3km north of Dover. Section 1 lies to the north of and crosses over the A2 and forms part of the Whitfield Urban Expansion, whilst Section 2 lies to the south of the White Cliffs Business Park. The site is predominantly located on and crosses agricultural land bounded by established hedgerows and trees. The community of Buckland is to the south of the site, Whitfield to the north-west and Guston to the north-east. The application plans are provided in Appendix 1. To the east of Section 2 of the Fastrack scheme (on the White Cliffs Business Park site) is the recently proposed location of an additional Inland Border Facility, permission for which would be

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

considered by the Ministry of Housing, Communities and Local Government under a Special Development Order. Please see paragraphs 115-116 for additional information regarding this proposal.

Background and Planning History

2. There have been a number of planning applications on and around the site, but most notable are those associated with the Whitfield Urban Expansion and the White Cliffs Business Park. The applicants have noted in their planning statement that the proposed development has been designed with these schemes in mind to make sure that all development is complimentary and deliverable. As the planning history is extensive the list has been included as Appendix 2 to this report.
3. Dover Fastrack would be a form of Bus Rapid Transit (BRT) which is defined as “*a flexible, frequent, dependable bus transit system that combines a variety of physical and operating elements into a permanent and integrated system with a quality image and unique identity*”. It is intended that Dover Fastrack would be a form of public transport which would provide a faster, more reliable and more comfortable journey for passengers compared to conventional bus services. In order to provide a faster journey time, road space would need to be allocated to give priority to BRT vehicles. BRT systems also require bus priority at junctions with a limited number of stops and real time information at those stops. BRT is not a new idea and has been employed in many towns and cities in the UK, most notably for Kent, the existing FastTrack in Dartford and Gravesham. Dover Fastrack is how the scheme is referred to in the report and how it would be known once operational, but references to a Bus Rapid Transit scheme are also made in the report as this is how the principle of this type of development was referred to in earlier Planning Policy documents, in particular those set out in paragraphs 36-42.
4. The proposed Fastrack as described in the proposal section below, would be for bus, cyclists, pedestrians and emergency vehicles only. When the surrounding parcels of land for the Whitfield Urban Expansion and White Cliffs Business Park are built out the two sections of road would provide access to these, but the bus gates and ANPR (Automatic Number Plate Recognition) cameras would restrict through traffic so that only the above vehicles would be able to access the bridge over the A2 or access onto/from Dover Road.
5. The concept of an express bus service for Dover has been proposed in a range of studies commissioned by both Dover District Council (DDC) and Kent County Council dating back to the mid to late 2000’s. Different routing options for the link between the White Cliffs Business Park and the entrance to Connaught Barracks were commenced in 2010, and at this stage three routes were assessed against a range of criterion including land ownership, length of route, cost of construction, permeability, landscape, ecology, trees and residential amenity. Ahead of the submission of the planning application, both DDC and KCC have undertaken a wide range of engagement with the public and both statutory and non-statutory stakeholders to inform the proposed development. The most recent round of public engagement was held in July 2020 and due to Covid-19 was held ‘on-line’ with engagement materials communicated to stakeholders via non-contact methods including digitally and via the post.

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

Environmental Impact Assessment (EIA) Screening

6. The applicants submitted an EIA Screening request to KCC on 29th October 2019, noting that the site is located within a 'sensitive area' as defined in Part 1, Regulation 2(1) of the EIA Regulations 2017. Section 3 of the route (which comprises the end of Section 2 southwards to the junction of the A258 and Castle Hill Road), whilst not requiring planning permission, is located within the boundary of a Scheduled Monument, namely Fort Burgoyne. It was therefore necessary to assess whether the Proposed Development was 'Schedule 2 Development' as per the EIA Regulations and whether it would have significant effects on the environment, taking into account the criteria set out in Schedule 3 of the EIA Regulations.
7. The EIA Screening request concluded that the proposed development would not be likely to cause significant environmental effects, therefore it did not require an Environmental Statement pursuant to the Regulations. This conclusion was reached in light of the scale and nature of the proposed development at the site and that the type and characteristics of any potential effect would, with mitigation, not lead to significant effects. In response to the EIA Screening Request, the County Council advised in their EIA Screening Opinion (dated 18th December 2019) that the proposed development did not constitute EIA development and as such an Environmental Statement was not required to support the planning application.
8. The Screening Opinion noted that the development was not of a scale or nature that would result in wide ranging environmental affects and would not have unusually complex and potentially hazardous environmental effects. It went on to state that whilst the physical changes would have a localised visual impact and result in changes to levels, some loss of trees, vegetation and habitat, and potential impacts on protected and other wildlife species, these impacts could be adequately mitigated by new planting, route alignment and the management and precautionary measures that are proposed.
9. When the application was submitted earlier this year, the red line of the proposed development had been amended slightly from that included in the EIA Screening request submitted in October 2019. A further Screening Opinion was therefore carried out by the County Council, issued to the applicant on 28th September 2020, which concluded that the proposed development would not be likely to have significant effects upon the environment by virtue of its nature, size or location, as the original Screening Opinion had found.

Other works

10. Whilst Sections 1 and 2 of the Fastrack scheme require planning permission, a third section would fall under permitted development rights and not therefore require a planning application. Section 3 is a 1.3km stretch of road which extends from where Section 2 ends, at the junction of the road south of Frith Farm, down along Dover Road to the junction of the A258. This stretch of development is bounded by open fields and woodland to the west with a row of residential properties for part of the route; and a residential development, Burgoyne Heights, and Connaught Barracks and Fort Burgoyne to the east.

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

11. The proposed development includes the enhancement and maintenance of the 1.3km stretch of Dover Road, which would be widened to facilitate passing points and visibility splays for road users as well as the provision of bus stop and associated layby and other engineering and enhancement works. The development would not affect or include land within the Fort Burgoyne scheduled monument or the grade II listed gate lodges and walls of the Duke of York's Royal Military School. The Town and Country Planning (General Permitted Development) Order 2015, Schedule 2 (Permitted development rights), Part 9 (development relating to roads), Class A (development by highways authorities) allows for development on land:

“(a) within the boundaries of a road, of any works required for the maintenance or improvement of the road, where such works involved development by virtue of section 55(2)(b)(g) of the Act; or

(b) on land outside but adjoining the boundary of an existing highway of works required for or incidental to the maintenance or improvement of the highway.”

12. In providing the EIA screening response, outlined above, the County Council confirmed that Section 3 of the scheme would be permitted development as it comprises of improvements to a highway by the Highway Authority within the boundaries of the highway and otherwise adjoining the boundaries of an existing highway which does not require an EIA can be carried out as permitted development pursuant to Part 9 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015.
13. The applicant therefore excluded this section of the road from the planning application and have advised that they will be submitting a Certificate of Lawful Development application before this work is carried out.

Proposal

14. **Section 1** of the proposed development would see the creation of a new stretch of road extending from the south of Phase 1A of Whitfield Urban Expansion, and then running in a south-westerly direction across the open fields. The road then turns to run approximately parallel with the A2, before rising up on an embankment and turning to cross over the A2 as part of a new bridge across. The bridge would span the A2 to land on a further raised embankment which would then descend between the Dover District Council offices to the west and Tesco to the east, before connecting with the roundabout on Honeywood Parkway.
15. The carriageway of the road would be two lanes wide (allowing traffic to travel in both directions) with a verge running along the southern/eastern side of the carriageway and a shared cycleway and footpath running along the northern/western edge of the road. The carriageway width would vary between 7.9m wide and 7.3m wide (the wider sections to allow for the bends in the road and for buses to pass by the pedestrian crossings), whilst the verge width would be 1.6m and the shared footway and cycle way 3m wide. A post and wire fence would be provided along the edge of this shared route.

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

16. To the north of the A2 the embankment would rise up from ground level at a gradient of 1:3 and would at its highest point (just before crossing the A2) be 9.8m above existing ground level. The bottom of this incline to the top would extend over a distance of approximately 26m, varying slightly due to the curve in the road. Around the bottom of the embankment the area would be landscaped with wildflower grassland and tree planting, and would also incorporate the proposed swale, alongside a public right of way which would run along the bottom edge of the embankment. A stepped pedestrian access from this lower public right of way up the embankment to the shared footway/cycleway along the edge of the road would be provided.
17. Two uncontrolled pedestrian crossings would be provided towards the northern end of the new road and a further crossing provided at the southern end of this Section close to the roundabout on Honeywood Parkway. A further uncontrolled pedestrian crossing would be provided approximately half-way along the new stretch of road (north of the A2) to allow the Public Right of Way ER54 to cross the new road. The public right of way would go directly across the road and then run to the north of the maintenance bay and along the northern side of the drainage features, and then run all the way along the base (northern edge) of the embankment, joining up with public right of way ER71 which runs directly along the rear of the gardens of the properties in Newlands. A separate application has been submitted to the Public Rights of Way Team for the proposed realignment of this route. From the crossing point of the PROW and the proposed road, access to the shared footway and cycle way running alongside the road would also be available.
18. The bridge itself would cross the A2 at a slightly skewed angle and would have a span of 28.85m from the north support to the south support – these supports being located at the outer edges of the A2 carriageway and hardened verge. The headroom between the carriageway and the bottom of the bridge would be a minimum of 5.3m. The north and south supports would consist of 5 reinforced concrete piles, topped with a pile cap and then 5 concrete columns rising to the underneath of the bridge deck. These supports would sit adjacent to the reinforced earth embankment. To the south of the A2 the new road would be supported by a new vertical retaining structure on the eastern side and an embankment of the western side (by the shared footway/cycleway). A 1.5m high metal parapet would run along both edges of the bridge for safety with anti-climb panels.
19. To the north of the A2, the ANPR bus gate would initially be sited close to the existing phase of the Whitfield Urban Expansion, but would then be relocated to a permanent position close to the start of the embankment once the housing development for all phases of the Whitfield Urban Expansion have been completed. The ANPR bus gate and no entry signs for prohibited vehicles at the other end of Section 1 of the road would be provided directly at the roundabout junction on Honeywood Parkway.
20. A maintenance access is proposed immediately to the south of the A2, to the east of the proposed bridge by the Highways England drainage basin. Three areas are shown as indicative areas for site compounds within the overall red line. Two would be located south of the A2 and to the west of this section of the road, one immediately adjacent to the A2 and one by the proposed junction at the Honeywood Parkway roundabout. The third is shown immediately to the north of the A2 to the east of the new road.

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

21. The scheme would utilise sustainable urban drainage systems for the treatment of surface water, with a swale constructed to run along the edge of the footpath at the base of the embankment to the north of the road and a series of drainage channels to the southern side of the road. Water flows would be directed into Biobasins¹ which would be located adjacent to the junction with the roundabout on Honeywood Parkway, one at the start of the embankment and one closer to the existing housing development on the Halsbury Homes site. Grasscrete maintenance access bays are proposed for these Biobasin features. In addition, two shallow swales would be provided to the east of the new road where it abuts the existing housing development scheme being built out.
22. **Section 2** of the proposed development would see the creation of a second stretch of road which would run in a generally southerly direction from a new fourth junction at the B&Q roundabout in the White Cliffs Business Park, before turning eastwards/south-eastwards to cut across to Dover Road. The carriageway would once again be a minimum of 7.3m wide, although as above wider in places to allow for bends in the road and road design. It would be formed of two lanes allowing for buses travelling in both directions. A shared cycleway and footpath would be provided on the western/southern side of the carriageway, separated from the carriageway by a verge. A grassed verge would also be provided on the opposite side of the road. A combination of both post and wire fencing and metal post stock proof fencing would run along both sides of the proposed road separating it from the open fields beyond.
23. The proposed road would pass across the path of the public right of way ER60, which is a Byway Open to All Traffic (BOAT) and forms part of the 156 mile long North Downs Way National Trail. A field access and an equestrian waiting area are proposed at the point where the right of way would cross the new road.
24. Initially the ANPR bus gate would be located at the junction of the B&Q roundabout, but this would be relocated further east along the scheme when the White Cliffs Business Park has been fully developed. At the eastern end of the scheme, the ANPR gates would be located just inside the junction with Dover Road.
25. There would be an uncontrolled pedestrian crossing point just to the south of the roundabout (crossing to a hard standing in the middle of the carriageway) and a further uncontrolled crossing just before the junction of the new road with Dover Road. Two bus stops are provided at this Dover Road end of the scheme. The cycle/footway would extend south along the western edge of Dover Road until it meets the existing residential development on this side of the road, and also extend to the north along Dover Road before becoming just a footway.
26. As with Section 1 'Biobasins' would be provided for surface water drainage – one to the east of the proposed road at the junction with the B&Q roundabout, one just to the east of the public right of way ER60 where it crosses the new road, one to the north of the proposed road just to the west of its junction with Dover Road and a fourth one just to the south of the property 'Arleigh' located on Dover Road. Highway filter drains would run along the northern edge of the carriageway and a drainage channel along the southern edge. Grasscrete maintenance access bays are proposed for these Biobasin features. Indicative areas for site compounds are shown just to the west of the

¹ A drainage balancing pond

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

proposed junction with Dover Road and to the east of the proposed road to the south of the B&Q superstore.

27. It is forecast that at its peak, there would be 4 buses per hour in each direction between the hours of 05:00 and 00:00, equating to a total of 152 buses per day. Each section of the road would be lit with 10m high lighting columns along the length of the proposed carriageway.

Planning Policy

28. The following Guidance/Statements and Development Plan Policies summarised below are relevant to the consideration of the application:

- (i) **National Planning Policy Framework (NPPF) February 2019** and the **National Planning Policy Guidance** (March 2014), sets out the Government’s planning policy guidance for England, at the heart of which is a presumption in favour of sustainable development. The guidance is a material consideration for the determination of planning applications but does not change the statutory status of the development plan which remains the starting point for decision making. However, the weight given to development plan policies will depend on their consistency with the NPPF (the closer the policies in the development plan to the policies in the NPPF, the greater the weight that may be given).

In determining applications, the NPPF states that local planning authorities should approach decisions in a positive and creative way, and decision takers at every level should seek to approve applications for sustainable development where possible.

In terms of delivering sustainable development in relation to this development proposal, the NPPF guidance and objectives covering the following matters are of particular relevance:

- significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (*paragraph 80*);
- public rights of way should be protected and enhanced, including taking opportunities to provide better facilities for users (*paragraph 98*);
- consideration of whether the opportunities for sustainable transport have been taken up and safe and suitable access to the site can be achieved for all people. Opportunities to promote walking, cycling and public transport use should be identified at the plan making stage and pursued (*paragraph 102*);
- whether impacts from the development on the transport network (in terms of capacity or congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road would be severe (*para 109*);

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

- achieving the requirement for high quality design and a good standard of amenity for all existing and future occupants of land and buildings. Planning decisions should ensure that developments would function well and add to the overall quality of an area; be visually attractive as a result of good architecture, layout and appropriate and effective landscaping; be sympathetic to local character and history, including the surrounding built environment and landscape setting; establish or maintain a strong sense of place, creating a welcoming and distinctive place to live, work and visit; include an appropriate mix of development and support local facilities and transport networks; and create places that are safe, inclusive and accessible (*paragraph 127*);
- the planning system should support the transition to a low carbon future in a changing climate...It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions;...and support renewable and low carbon energy and associated infrastructure (*paragraph 148*);
- planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and site of biodiversity or geological value; recognise the intrinsic character and beauty of the countryside – including the economic and other benefits of best and most versatile agricultural land, and of trees and woodland’ minimise impacts on, and provide new gains for biodiversity; prevent new and existing development from contributing to unacceptable levels of soil, air, water or noise pollution; and remediating and mitigating derelict, contaminated and unstable land where appropriate (*paragraph 170*);
- planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including the setting) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage assets conservation and any aspect of the proposal (*paragraph 190*).

(ii) The adopted **Dover Core Strategy (adopted February 2010)**

- Policy CP1 Settlement Hierarchy:** The location and scale of development in the District must comply with the settlement hierarchy. The hierarchy should also be used by infrastructure providers to inform decisions about the provision of their services. Dover is identified as the top of the hierarchy, being a Secondary Regional Centre and the ‘major focus for development in the District, suitable for the largest scale development’.
- Policy CP6 Infrastructure:** Development that generates a demand for infrastructure will only be permitted if the necessary infrastructure to support it is either already in place, or there is a reliable mechanism to ensure that it will be provided at the time it is needed. In determining infrastructure requirements applicants and infrastructure providers should first consider if existing infrastructure can be used more efficiently, or whether demand can be reduced through promoting behavioural change, before proposing increased capacity through extending or providing new infrastructure.

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

The main elements of the infrastructure required to support the strategy are set out in a table in the Core Strategy and includes the following, relevant to this application:

Infrastructure Type	Infrastructure Required	Purpose	Broad Timing
Transport	Dover town centre to Whitfield express bus link (Dover Transport Strategy)	To improve public transport service and reliability between the town centre and major urban extension and reduce trips by private car	2011-2016

Policy CP11 The Managed Expansion of Whitfield: The site to the west, north and east of Whitfield is allocated for an expansion of Whitfield comprising at least 5,750 homes supported by transport, primary education, primary health and social care, utility services and green infrastructure together with retail, financial and professional offices, eating and drinking establishments (Use Classes A1 to A5). Planning permission will be granted provided: -

- iv. An access and transport strategy is developed that maximises the potential for walking, cycling and the use of public transport, especially to the town centre and the White Cliffs Business Park area, includes link/distributor roads to connect the site to the surrounding network, identifies access points to the site and between the site and the existing settlement, safeguards land for a park and ride facility and identifies construction access arrangements that do not disrupt existing residents;

Policy DM1 Settlement Boundaries: Development will not be permitted on land outside the urban boundaries and rural settlement confines as shown on the settlement maps unless specifically justified by other development plan policies, or it functionally requires such a location, or it is ancillary to existing development or uses.

Policy DM2 Protection of Employment Land and Buildings: Land allocated for employment uses as shown on the Proposals Map or with extant planning permission for employment uses will not be granted permission for alternative uses unless it has been subsequently allocated for that alternative use in a Development Plan Document. Permission for changes of use or redevelopment of land and buildings currently or last in use for employment purposes will only be granted if the land or buildings are no longer viable or appropriate for employment use.

Policy DM12 Road Hierarchy and Development: The access arrangements of development proposals will be assessed with regard to the Highway Network set out in the Local Transport Plan for Kent. Planning applications that would involve the construction of a new access or the increased use of an existing access onto a trunk or primary road will not be permitted if there would be a significant increase in the risk of

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

crashes or traffic delays unless the proposals can incorporate measures that provide sufficient mitigation.

Policy DM15 Protection of the Countryside: Development which would result in the loss of, or adversely affect the character or appearance of the countryside will only be permitted if it is:

- i. in accordance with the allocations made in Development Plan Documents; or
- ii. justified by the needs of agriculture; or
- iii. justified by a need to sustain the rural economy or a rural community;
- iv. it cannot be accommodated elsewhere; and
- v. it does not result in the loss of ecological habitats

Provided that measures are incorporated to reduce, as far as practicable, any harmful effects on countryside character.

Policy DM16 Landscape Character: Development that would harm the character of the landscape, as identified through the process of landscape character assessment will only be permitted if (i) it is in accordance with allocations made in Development Plan Documents and incorporates any necessary avoidance and mitigation measures; or (ii) it can be sited to avoid to reduce the harm and/or incorporate design measures to mitigate the impacts to an acceptable level.

Policy DM17 Groundwater Source Protection: Within Groundwater Source Protection Zones shown on the Proposals Map, the following will not be permitted in Zones 1 and 2 unless adequate safeguards against possible contamination are provided: (i) septic tanks, storage tanks containing hydrocarbons or any chemicals, or underground storage tanks; (ii) proposals for development which may include activities which would pose a high risk of contamination unless surface water, foul or treated sewage effluent, or trade effluent can be directed out of the source protection zone; (iii) proposals for the manufacture and use of organic chemicals, particularly chlorinated solvents; (iv) oil pipelines; (v) storm water overflows; (vi) activities which involve the disposal of liquid waste to land; and (vii) sustainable urban drainage systems. New graveyards will not be permitted in Zone 1. Farm waste, storage areas, new foul or combined sewerage systems will also not be permitted in Zone 1 unless adequate safeguards are provided.

- (iii) The adopted **Land Allocations Local Plan (adopted January 2015)** states in paragraph 3.32 “The need for a fast and reliable express public transport system to increase accessibility and reduce the number of trips made by private car was a key component of the Dover Transport Strategy and the Core Strategy. This is being delivered by proposals for a Bus Rapid Transit (BRT) which will provide a public transport connection from the planned urban extension at Whitfield, White Cliffs Business Park (WCBP) via Connaught Barracks/Dover Castle to the town centre and Dover Priory railway station.”

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

Paragraph 3.45 states “Planning applications in Phase III will need to incorporate proposals to connect the BRT system to Dover Road. Traffic management measures will need to be put into place at the end of the WCBP to restrict access onto Dover Road to only BRT and emergency access. In order to encourage public transport patronage from employees it is important that proposed development is designed to ensure that pedestrian routes to each BRT stop are clearly defined, safe, well-lit and subject to natural surveillance. This key objective should form part of any design proposal in any subsequent proposals for the WCBP.”

Policy LA2 White Cliffs Business Park: The site is allocated for employment development. Planning permission for Phases II and III will be permitted provided:

- (i) development is for Use Classes B1/B2/B8, and employment generating uses that are not specified in the Use Class Order;
- (ii) proposals maximise the potential use of public transport and ensures development fronts the main spine road and includes clear and safe pedestrian routes for public transport stops;
- (iii) the integrity and setting of the North Downs Way is preserved and enhanced by retaining the existing hedgerow, strengthening by additional planting of three metres either side of the North Downs Way, and setting back development 10 metres from the new planting, or a new ‘green bridge’ pedestrian connection is delivered across the A2 to improve the setting and directness of the North Downs Way;
- (iv) Byway ER55A is retained and enhanced;
- (v) structural landscaping is carried out at the sites main boundaries. Additionally, in the case of Phase II:
 - (vi) a tree shelter belt at least 20m wide along the southern boundary is provided;
 - (vii) no building is constructed within 15metres of the shelter belt;
 - (viii) no building constructed within 50 metres of the shelter belt exceeds 10m in height; and
 - (ix) vehicular access and servicing extends up to the boundary with Phase III.

Additionally, in the case of Phase III:

- (x) proposals incorporate measures to provide a direct and convenient BRT route to Dover Road;
- (xi) traffic management measures are introduced that restrict access to Dover Road to BRT/emergency access;
- (xii) a landscaped buffer zone at least 25 metres wide in the vicinity of Dover Road is provided; and
- (xiii) development adjacent to the buffer zone is Use Class B1 only and does not exceed 10 metres in height.

(iv) **Local Plan (adopted 2002) Saved Policies:**

Policy TR4 A2 Safeguarding: Land is safeguarded on the Proposals Map for the construction of (a) the A2 dualling, Lydden Hill to the Duke of York roundabout, Dover; and (b) The A256 scheme, Sandwich.

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

Policy C08 Hedgerows: Development which would adversely affect a hedgerow will only be permitted if (i) no practicable alternative exists; (ii) suitable native replacement planting is provided; and (iii) future maintenance is secured through the imposition of conditions or legal agreements.

Policy ER6 Light Pollution: Proposals for development which entail: (i) advertisement illumination will not be permitted unless units are well directed and not excessive for the task; (ii) external lighting will only be permitted where full cut-off lanterns are used, unless Historic Environment interests indicate otherwise.

- (v) **Whitfield Urban Expansion Supplementary Planning Document (SPD) Adopted Masterplan, April 2011.** The masterplan sets out a framework for how the proposed expansion of Whitfield should be undertaken. It develops the proposals for growth that were set out in principle in the Core Strategy, which identified Whitfield as a suitable location to create a new residential area supported by a full range of infrastructure. The masterplan identifies the Highway and Infrastructure improvements, which include a pedestrian, cycle and bus bridge across the A2, with the implementation of a Bus Rapid Transit system.
- (vi) **Dover Transport Strategy (adopted 2007).** The primary purpose of this document was to support the development of the Core Strategy which proposes significant growth for Dover during the period up to 2026. The strategy identified the need to manage traffic growth associated with the regeneration and economic growth of Dover as proposed through the Core Strategy. Dover Fastrack is noted as a priority public transport scheme within the Transport Strategy:

Para 10.6.6: Express Service – To supplement the proposed improvement to the existing local bus service, and Express Bus Service could be introduced which “piggy backs” off the proposed Park and Ride site in proximity to the A2 and A256. Independent of where the Park and Ride site is located, the bus service could be routed within the proposed Whitfield development, providing an Express Link between the proposed Whitfield development site and central Dover. This would provide an attractive, frequent and fast journey to Dover Town Centre, the port and Dover Priory Rail Station for residents of Whitfield.

- (vii) The new **District Local Plan 2020-2040.** The Council is in the process of preparing a new District Local Plan to cover the period 2020-2040, which will set out key policies for the District. Once adopted, the Local Plan will replace the current suite of Development Plan documents noted above. The Local Development Scheme produced in December 2019 identified that the new Local Plan would be adopted in April. However, consultation on the plan has been postponed due to Covid-19 so the date of adoption is subject to change.

Other Material Considerations:

29. In addition to the considerations arising from the planning policy section above, local finance considerations and other strategy documents are also material considerations for the determination of this application.

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

- (i) The local finance consideration arising from s43 of the Localism Act 2011, Section 43 amends Section 70 of the Town and Country Planning Act 1990 (determination of applications for planning permission: general considerations) such that in the determination of a planning application, the local planning authority must have regard to:

- (a) the provisions of the development plan, so far as material to the application,
- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations

Section 70(4) of the 1990 Act (as amended) defines a local finance consideration as a grant or other financial assistance that has been, that will or that could be provided to a relevant authority by a Minister of the Crown. In this case, the financial assistance is that arising from the award of a grant from Homes England in 2019 under the Housing Infrastructure Fund of £16.1 million. The Housing Infrastructure Fund was a scheme to provide up to £2.3 billion of government funding to help ensure the right infrastructure was in place at the right time to unlock housing development in the Country. In deciding an application for planning permission where a local financial consideration is material, decision takers need to ensure that the reasons supporting the decision clearly state how the consideration has been taken into account and its connection to the development.

- (ii) The Local Transport Plan 4: Delivering Growth without Gridlock (2016-2031) (LTP4) published in July 2017 identifies transport priorities for the County, as well as emphasising the investment required to support growth. It sets out as one of its local priorities for the Dover district the provision of the Whitfield Bus Rapid Transit as a means of "...delivering resilient transport infrastructure to reduce congestion, improve journey time and enable economic growth and appropriate development, meeting demand from a growing population".

Consultations

30. The following consultee responses were received as a result of the consultation carried out in September 2020.

Dover District Council state that the principle of the development would accord with the development plan and the Whitfield Urban Expansion SPD. Whilst the development would have a visual impact, in particular due to the new bridge over the A2, they consider the development would be seen within a context of residential development, the strategic road network and a developing business park. They suggest that careful use of structural soft landscaping would help reduce the visual impact (both from the PROW adjacent to the bridge and in longer views) and request that this is secured by condition. Whilst an adverse visual impact is nonetheless predicted, they state that this must be balanced against other considerations. The need for the bridge, and the benefits which would be derived from it, have been set out in detail within the applicant's Planning Statement and it is considered that these benefits are compelling. The provision of the bus and pedestrian route would provide enhanced access between the districts largest development site and Dover Town Centre and Dover Railway Station, enabling a modal shift towards more sustainable forms of transport and reducing the number of private cars on the local and strategic highway networks. They state that care

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

will need to be taken to ensure that the impacts of the development on the amenity of residential properties neighbouring the site are taken into consideration, particularly regarding overlooking, perceived overlooking and noise. However, notwithstanding the need for careful consideration of several aspects of the development, Dover District Council raises no objection to the application.

Guston Parish Council raise an objection on the grounds of increased traffic that will impact residents of Guston who live on Dover Road. They are concerned about the frequency of buses on Dover Road which cannot cope due to flooding, pinch points and blind spots. Increase in noise and pollution for residents at the top of Old Charlton Road and Dover Road. Concern for families that walk from Guston village to Burgoyne Heights due to the lack of a pathway. Dover Road should be widened using land on the Duke of York's school side. Passing places will not help the buses every 20 minutes and the fact agricultural farm machinery uses the road has been completely overlooked. They suggest a proper footpath should be extended right down into the village so residents would benefit from a safe way to walk to the school at Burgoyne Heights. They Parish Council do not see the need for this service at all as most people have a car and don't want to catch the bus. Residents of Guston live in the village as they don't want to be linked to the town. The Parish Council think this proposal would have a detrimental effect on the village of Guston and would not provide any substantial benefits. They have major reservations about the application and the viability of the scheme.

Whitfield Parish Council have not responded to the consultation.

KCC Highways and Transportation Officer raise no objection to the application subject to the imposition of a condition requiring a Construction Management Plan to be submitted prior to commencement of development and an informative requiring all necessary highway approvals being sought.

Highways England raise no objection to the development subject to the imposition of conditions, one for a Construction Management Plan and one to restrict use of the road to buses, cycles, pedestrians and emergency vehicles only.

Public Rights of Way (East Kent PROW Team) raise no objection to the proposal subject to the imposition of a condition requiring a PROW Management Scheme, and an informative reminding the applicant about the timescales required for any temporary closure of a PROW.

KCC Biodiversity Officer raises no objection subject to the imposition of conditions relating to lighting to ensure it accords with the lighting strategy set out in the Ecological Mitigation Strategy; securing ecological mitigation through the Construction Management Plan; that fencing on site should retain connectivity for badgers; the implementation of the Landscape Management and Maintenance Plan as detailed for the lifetime of the development; and that an updated badger survey should be undertaken prior to the commencement of development.

KCC County Archaeological Officer raises no objection subject to the imposition of two conditions, one to secure the implementation of a programme of archaeological work in accordance with a written specification and timetable to be approved by the

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

County Planning Authority and one to provide a Post Excavation Assessment Report for approval within 9 months of the completion on site.

KCC Conservation Officer raises no objection to the application. He concurs with the conclusion of the Historic Environment Desk Based Assessment (HEBDA) submitted, that the proposals would result in less than substantial harm to these assets.

Environment Agency (Kent Area) raise no objection subject to conditions requiring a remediation strategy to be submitted prior to commencement of development; a verification report to be submitted before the road is first brought into use; no further development being undertaken if additional contamination is found that had not previously identified; no infiltration of surface water into the ground without consent; and no piling without consent.

Natural England raise no objection. Based on the plans submitted they consider that the proposed development will not have a significant adverse impact on statutorily protected nature conservation sites. They note however that the development is close to the Kent Downs AONB and advise that the Kent Downs AONB Unit should be consulted.

Kent Downs AONB Unit have not responded to the consultation.

KCC Flood and Water Management Officer raise no objection subject to the imposition of conditions to cover the submission of a detailed sustainable surface water scheme, and that the road is not brought into use until a verification report has been submitted.

The Coal Authority state that in accordance with the agreed approach to assessing coal mining risks as part of the development process, if the proposal is granted planning permission, it will be necessary to include The Coal Authority's Standing Advice within the Decision Notice as an informative note to the applicant in the interests of public health and safety.

Network Rail Infrastructure Limited advise that from a planning perspective they raise no objection to the proposal. However, the proposal includes work within close proximity to a railway tunnel, and as a result Network Rail recommends the applicant/developer contact Network Rail's Asset Protection and Optimisation Team (ASPRO) prior to works commencing. The ASPRO team will ensure the works can be completed safely without posing a risk to the operational railway. Also recommend informatives be imposed on any decision notice regarding Asset Protection.

UK Power Networks have not commented on the application.

Kent Police Designing Out Crime Officer recommends that the applicant looks at guidance in the Tram and Train station documents and advises the applicant to consider maximum surveillance, boundary treatments, security, CCTV and site security for the construction phase.

Amey – Air Quality raise no objection. They are satisfied that air quality has been suitably assessed for the proposed development, and that, subject to the mitigation

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

measures recommended within the report being implemented, no further assessment is required in this regard.

Amey – Noise raise no objection to the development on noise and vibration grounds subject to a condition requiring a Construction Environmental Management Plan be submitted prior to commencement of development so that the best mitigation measures can be put in place prior to any works being implemented. In addition they support the applicant's view that a Section 61 prior consent agreement under Control of Pollution Act be sought from the Local Authority for night time works for the bridge construction, which will ensure specific mitigation measures be put in place to minimise noise at nearby receptors.

Amey – Landscaping raise no objection subject to conditions securing tree protection measures prior to the commencement of development, and an informative being added to make sure works are carried out outside of the bird nesting season (March 1st to August 31st inclusive). Comment that no Landscape Specification document has been submitted but note that extensive planting notes are contained on the submitted drawings.

Local Member

31. The local County Member for Dover West, Mr Geoff Lymer; the County Member for Dover North, Mr Steve Manion; and the County Member for Dover Town, Mrs Pauline Beresford were all notified of the application on 6th October 2020. A written response has been received from Mr Lymer raising objections to the application as follows:

- Local communities do not want the scheme;
- Cost of the road scheme would be in excess of the funding allocated and no S106 monies are forthcoming;
- Dover rail infrastructure wouldn't be able to cope with the increased passenger numbers;
- Residents in villages are more likely to use Martin Mill station or Temple Ewell station and neither is covered by the rapid bus transport system;
- For the bus system to be effective it needs a dedicated bus lane in the town centre;
- Dover town is likely to become more gridlocked especially with Operation Tap post Brexit;
- Price tariffs would need to be competitive;
- Suggest Dover needs a circular Tram system with buses from outlying villages terminating at the edge of the tram route.

Publicity

32. The application was publicised by the posting of 15 site notices and an advertisement in a local newspaper.

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

Representations

33. In response to the publicity, 3 letters objecting to the application have been received, with a further 2 letters commenting on the application. In addition, a letter of support has been received from the Leader of Dover District Council, which will be summarised separately at the end of this section.

A summary of the main planning issues raised is set out below:

Objections

Need for the scheme

- No justification for this ‘vanity project’ in planning or highway terms, restricted to pedestrians, cyclists and the bus – supposed benefits are more than outweighed by the negative impacts on the local area;
- Scheme would not enhance the town in general as it would only skirt round the centre in one direction and avoids it completely in the other;
- The application would appear to meet the need to spend the grant from the Government rather than proving an operational need for the road or practicality of it;
- No proven need for the creation of the new bus service or the colossal capital sum to be spent on its creation;
- Local traffic would not be allowed to use the new road therefore without the bus service this would just be two expensive sections of cycle track;
- Cost of resurfacing Dover Road would be prohibitive;
- If Dover Road is to be widened this would require compulsory powers and further significant expenditure to the detriment of residents;
- Existing bus service (other than the school service at the start and end of each day) cannot be viable as the bus is frequently empty;

Highway/Transport Concerns

- The road ends on a country lane with no provision for safe or sensible continuation;
- Disruption for residents of Guston due to 6 buses an hour using minor roads not designed for this type of traffic;
- Fastrack scheme will not be ‘fast’ as it would go through the Connaught Barracks site where traffic calming measures would be reduced to a crawl for safety of residents;
- Proposed route would add to challenges at all points on its route to Dover Priory station and would not be rapid;
- The buses would come out onto Castle Hill where coaches for the castle routinely block the road whilst manoeuvring into the car park;
- Castle Hill frequently blocks when Dover TAP is in place, especially in the period between the port becoming blocked and the initiation of Operation Stack and will be exacerbated by the EU Exit transition;
- Townwall Street/A20 is also a road frequently blocked by Dover TAP and would therefore affect the Fastrack route;
- The new roads are likely to cause immediate difficulties to solve a possible future problem;

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

- Project will conflict with the Government's Inland Border Control Facility (IBCF) which would involve the creation of an access at the B&Q roundabout, the passage of HGV's to and from the site, with accompanying traffic implications;
- HGV's using Dover Road looking for the IBCF would be problematic for the bus routes proposed;
- Junction with Dover Road would be dangerous and close to an extended S bend;
- Dover Road is inadequate for the bus route due to its width, deficient metalled surface and problematic dip and curve at the top of Old Charlton Road;
- Fastrack route would conflict with farm traffic and local resident traffic and is not wide enough for buses and other large vehicles to pass each other in places;
- Road appears to be designed to cater for high volumes of traffic, being straight and wide, and fear the intention is to open the new road and bridge to all traffic;
- Lack of physical barriers to prevent use by ordinary traffic other than buses will lead to misuse of the road and associated impact on residents in new housing in Richmond Park (Whitfield Urban Expansion);

Amenity Impacts

- The construction of a bridge over the A2 would create roadworks and disruption at a time when disruption from the EU exit is already expected in the area;
- Scheme will affect a Public Right of Way and result in the loss of valuable farmland;

Pollution

- Project would not be environmentally sustainable by virtue of the construction work and the use of diesel buses;
- Congestion causing the buses to slow down and the pollution from the frequency of buses would have disastrous environmental consequences;

Layout/Design

- Scheme departs substantially from the original concept which Halsbury Homes supported;
- Scheme is poorly designed and takes up far too much development land;
- Road design disregards already approved building plots and agreed masterplan;
- Road design disregards approved green infrastructure and Special Area of Conservation (SAC) mitigation;
- Surface water drainage design is unattractive and takes up too much land;
- Access to the new road has not been made for the remainder of the Richmond Park development;
- No assessment of alternatives included in the application, such as a single lane bridge over the A2 which would reduce land take, the cost of the scheme, and reduce the amount of surface water to be disposed of; a narrow and more windy road which would slow traffic down; and physical barriers tripped by responders on authorised buses to avoid misuse of the road;

Other

- Land owners [Halsbury Homes, of land to the north of the A2] should have been formally notified by letter from the County Council;
- No agreement reached with Halsbury Homes for acquiring the land for the Bus Rapid Transit scheme, therefore no guarantee to ensure it can be delivered in time to meet the requirements of the funding;

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

- Any subsequent Compulsory Purchase Order as a result of the above would, according to Halsbury Homes, be so large as to bring the viability of the scheme into question;
- Inappropriate for a scheme to provide 28% net gain but at the expense of environmental mitigation that is required to be provided by others.

Comments

- Would like the new bus route to take into account Aylesham Village;
- There are no buses to serve the residents of Aylesham to get to the new leisure centre at Whitfield, to Dover town centre or Dover Priory Station;
- There will be over 1400 new houses in Aylesham when building has been completed and buses are needed as a priority;
- If uptake of the Fastrack bus service is low and makes the scheme financially unviable, local residents will have to pay through council taxes to maintain a failing service;
- Coronavirus is likely to result in businesses streamlining rather than expanding;
- Surveys suggest a large number of residents won't use the Fastrack service, therefore it would be better to fund the existing bus services;
- The bus gates are subject to misuse without proper security, especially at the Dover Road exit where it is rural in nature;
- The roman road public right of way still needs to be available for all users legally entitled to use it;
- Dover Road is of limited width all the way down to the castle and would impede Fastrack buses;
- Fastrack service would not benefit residents of Dover, River and Temple Ewell, who would use a car as more convenient;
- Have all business interests been declared on working groups and committees such that KCC and DDC would not gain financially from this;
- The majority of the town will not benefit from this.

Summary of Letter of Support from Councillor Trevor Bartlett, Leader of Dover District Council.

- The provision of a new bus cycle and pedestrian infrastructure is central to the Dover Fastrack project, which will create a fast and reliable public transport link between Whitfield, the White Cliffs Business Park, Dover Town and Dover Priory Station;
- The scheme would support the planned expansion of Whitfield and the re-development of Connaught Barracks;
- The creation of the rapid bus link is crucial to realising the Council's housing ambitions;
- This scheme has gained more importance approaching Transition and due to other external factors such as the Lower Thames Crossing which will add to the strategic transport loadings on the A2;
- The value of this connection between Whitfield housing allocation, the White Cliffs Business Park and Dover will assume even greater importance over time, absenting the use of the A2;

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

- Dover District Council, in collaboration with KCC, prepared a bid to the Housing Infrastructure Fund in 2017, and Homes England awarded a grant of £16.1 million in 2019;
- This was the highest awarded grant that year reflecting the importance of the project in supporting housing delivery;
- Although monetary matters are not usually relevant to the determination of a planning application, regard must be had to the Localism Act 2011. Paragraph 143 indicated that local planning authorities should have regard to local finance considerations as a material consideration where they are relevant to the application, as may be the case with the grant awarded;
- DDC and KCC [as applicant] have collaborated closely on this project and undertaken a range of site surveys, preparation of detailed designs, undertaken community engagement and begun developing a service specification – much work is already underway.

Discussion

34. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph 28 above. Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The proposal therefore needs to be considered in the context of the Development Plan Policies, Government Guidance and other material planning considerations arising from consultation, publicity and the Localism Act.
35. This application is being reported for determination by the Planning Applications Committee due to the objections received opposing the scheme by both residents and one of the Local County Members. In my opinion, the key material planning considerations in this particular case are the principle of development and the need for the Fastrack scheme; the transport and highways benefits and impacts of the scheme; the landscape and visual impact of the development including the impact of lighting; the impact on amenity of local residents; the impact on the Public Rights of Way crossing the development site; the air quality and noise impacts arising from the development; ecological impacts and biodiversity net gain; archaeological impacts; the effect of the scheme on flood risk and drainage; and the contamination impacts from the development. An outline of the proposed White Cliffs Inland Border Facility referenced in the representations summarised above is also provided at the end of the report.

Principle of Development and Need for the Fastrack Scheme

36. The proposed development would create the infrastructure required to facilitate a new Bus Rapid Transit system (referred to as Fastrack in this report) in Dover. The two new sections of road including a new bridge over the A2 would link Whitfield to the north with Dover Town Centre, and would serve destinations including (but not limited to) the Whitfield Urban Expansion, White Cliffs Business Park, Connaught Barracks, Dover Priory railway station and the St James regeneration area alongside the A20. It would support the development of two major housing allocations in Dover by allowing the creation of a faster and more reliable journey for public transport users and provide

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

priority links to the town centre and railway station. In so doing it would deliver and thereby promote sustainable methods of transport.

37. The concept of a BRT system was proposed as far back as 2007 when it was included in the Dover Transport Strategy. This document supported the development of the District Council's Core Strategy (part of its Local Plan), which identified the need to manage traffic growth associated with the regeneration and economic growth of Dover. The Fastrack project was noted as a priority public transport scheme within the strategy, with the aim that it would provide an attractive, frequent and fast link between Whitfield, the Whitfield Urban Expansion and Dover Town Centre. In 2011 the Whitfield Urban Expansion Masterplan was adopted and published which also included the aim of implementing a Bus Rapid Transit system through the site along with highway infrastructure improvements of a bus, cycle and pedestrian bridge over the A2. The proposed development would therefore accord with the Dover Transport Strategy and the Whitfield Urban Expansion Masterplan.
38. The adopted Dover Core Strategy (2010) sets out in Policy CP6 the need for the necessary infrastructure to be in place to support the strategy and enable development, and this included the need for the Dover town centre to Whitfield express bus link to help reduce the number of trips made by private car. Furthermore, Policy CP11, which covers the managed expansion of Whitfield lists as a requirement an access and transportation strategy to maximise the potential for walking, cycling and the use of public transport, especially between the site and the town centre. The proposed development would therefore accord with these elements of the Core Strategy.
39. This policy backing for the scheme is reiterated in the later Land Allocations Local Plan, adopted in 2015, which stated that there was a need for a fast and reliable express public transport system to increase accessibility and reduce the number of trips made by private car and that this should be delivered by proposals for a Bus Rapid Transit system connecting the planned urban extension of Whitfield to the town centre and railway station. It goes on to state that development of the White Cliffs Business Park should also incorporate proposals to connect to the BRT system and that this should be a key objective of any development here. Policy LA2 of the Land Allocations Plan expressly sets out a requirement for proposals to incorporate a direct and convenient BRT route to Dover Road, and for traffic management measures to restrict access to Dover Road for the BRT system and emergency vehicles only. The proposed development would therefore accord with the Land Allocations Plan.
40. The proposed development would also comply with the aims of the Local Transport Plan 4: Delivering Growth without Gridlock (2017) which lists as a local priority for the Dover district the provision of the Whitfield Bus Rapid Transit, with the aim that it would reduce congestion, improve journey time and enable economic growth.
41. In terms of the overarching guidance of the NPPF, at the heart is a presumption in favour of sustainable development. This proposal would seek to deliver and thereby promote sustainable methods of transport including walking, cycling and public transport, a key aim of the NPPF. Furthermore, the development would enable economic growth, enhanced accessibility to homes, services and facilities, and provide a solution which minimises pollution and environmental impact.

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

42. It is evident from the above that there is clear policy support and backing for the delivery of the infrastructure required for the Dover Fastrack scheme.

Funding – Localism Act

43. Whilst monetary matters are not usually a relevant material consideration in the determination of planning applications, in this case, not having regard to the finance considerations in relation to the Localism Act (2011) would arguably mean that the Committee had not assessed all relevant material planning considerations in its decision making. Paragraph 143 of the Localism Act 2011, titled '*Applications for Planning Permission: Local Finance Considerations*' states that local planning authorities should have regard to local finance considerations as a material consideration where they are relevant to the application before them. Local finance considerations are thereafter defined as 'a grant or other financial assistance that has been, or will be, provided to a relevant authority by a Minister of the Crown.'
44. The Housing Infrastructure Fund was a scheme to provide up to £2.3 billion of government funding to help ensure the right infrastructure was in place at the right time to unlock housing development in the Country. Dover District Council, in collaboration with Kent County Council, prepared a successful bid for some of this funding to help deliver the Dover Fastrack scheme in Whitfield, and were awarded a grant of £16.1million in 2019 from Homes England. The grant was the highest awarded by the programme that year, reflecting the importance of the project in supporting housing delivery.
45. The securing of the above funding for the sole purpose of delivering the Dover Fastrack should, in this instance, be a material consideration in the determination of this application. The funding is awarded, subject to planning, on the basis that it would help unlock the potential of the two major allocated housing sites at Whitfield and the former Connaught Barracks.

Transportation and Highway Considerations

46. One of the key objectives of the Dover DC Core Strategy is to "*improve ease of travel to, from and within the District for both people and freight; concentrate development where it can best align with facilities and reduce the need for travel, especially at the Regional Hub of Dover, and encourage walking, cycling and public transport through the provision of new facilities.*" The two proposed sections of road being applied for as part of this planning application seek to meet this aim completely.
47. The roads are proposed in the vicinity of the A2, a major road connecting Dover to London and which sees high volumes of traffic and often congestion. The A256 junction with the A2 lies to the east of Section 1 of the proposed road and overbridge, and to the north of Section 2, and the road that would connect the two sections is Honeywood Parkway. Honeywood Parkway is a single carriageway road with footways on each side of the road which provides access to numerous retail and commercial facilities, along with the new Dover Leisure Centre. The proposed Fastrack scheme aims to provide an alternative mode of transport between Whitfield and the town centre which would avoid the overreliance on the private car and use of these existing roads.

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

48. The application has been supported by the submission of a Transport Statement (TS) for the two new sections of the road, which assesses the existing conditions at the site including current pedestrian, cycle, rail and bus facilities in the vicinity, and this document along with the application plans have been considered by the County Council Highway and Transportation Officer and Highways England as part of the planning application process.
49. The key junctions of the proposed Fastrack road would be restricted to use by buses, cycles, pedestrians and emergency vehicles, and these would be controlled by bus gates and ANPR cameras. Once the Whitfield Urban Expansion and White Cliffs business park are built out, the restrictions would be in both directions for the proposed bridge over the A2, and in both directions at the junction with Dover Road. The number of bus services may initially be lower until the Whitfield housing is built out and patronage increases, however the proposals would ultimately allow for 8 buses per hour, four in each direction, operating between 5am and midnight, seven days a week. This would equate to a maximum of 152 buses per day using the route. The TS states that modelling of an additional arm at the Tesco roundabout showed no capacity concerns in 2024, with the longest delay being 13 seconds on Honeywood Parkway (West) in the AM and PM peak. Similarly, the modelling showed that the additional arm at the B&Q roundabout would not present any capacity concerns in 2029, with the longest delay predicted as 7 seconds on Honeywood Parkway (West) in the PM peak. In addition the TS states that the nature of the scheme would be to reduce the use of private vehicles between Whitfield and Dover Town Centre, therefore a proportion of existing traffic would be removed from the network as the bus service becomes operational.
50. The proposed development would provide a safe pedestrian crossing over the A2 linking to existing footpath provision along Honeywood Parkway, and also providing a cycle link that would, by utilising both sections of the road, link Whitfield with the existing Regional Cycle Route 16 that runs along Dover Road and connects Dover to Canterbury. The facilities would benefit not only the new housing in the Whitfield Urban Expansion but also to some extent, the existing housing in Whitfield itself.
51. The County Highways and Transportation officer has confirmed that he has no objections to the scheme in respect of highway matters or the content of the TS, and welcomes the enhancement of sustainable travel in the area which the proposals would provide. Highways England have also confirmed they have no objection to the scheme subject to the imposition of various conditions (outlined below).
52. The proposed development would meet the overarching aim of the NPPF in that it would encourage and promote a sustainable form of transport, not least by offering a genuine choice of transport mode for all users, which should help reduce congestion and emissions and improve air quality and public health. The provision of a fast and reliable route for buses between Whitfield and the town centre would be in accordance with the NPPF. The scheme would also be in compliance with Policies CP6, CP11 and DM12 of the adopted Core Strategy and Policy LA2 of the Land Allocations Plan in that it would deliver the promoted Bus Rapid Transit link and would not result in any significant increase in traffic delays as a result of the new junctions onto the existing road network. Furthermore the scheme would not impact the safeguarded land for the proposed

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

dualling of the A2 as covered by Policy TR4 of the saved policies of the Local Plan from 2002.

53. It is therefore considered that from a transportation and highway point of view, the scheme would be acceptable and in accordance with National and Local planning policy, subject to conditions to cover the submission of a Construction Management Plan to control aspects such as hours of construction; timing of HGV movements; routing of delivery and construction vehicles to/from site; travel plans for site workers, visitors and deliveries; wheel washing facilities to prevent dust, dirt and detritus entering the public highway etc; and mitigation measures to control the potential nuisance from noise, vibration and night time bridge works. In addition, a condition restricting the Fastrack scheme to use only by buses, cycles, pedestrians and emergency vehicles would also be required.

Landscape and Visual Impact

54. The planning application was supported by the submission of a Landscape and Visual Appraisal (LVA) which considered the impact of the road scheme on landscape character and visual amenity. The landscape and visual appraisals are separate but linked processes, which describe a closely related but distinct set of effects. The objectives of the LVA were to identify the landscape planning policy relevant to the proposed development; appraise the landscape character baseline of the local area at national, county and local level; appraise the landscape characteristics of the areas affected by the proposed development and its contribution to local landscape character; appraise the visibility of the proposed development and the nature and quality of the existing views from the surrounding area; and inform the iterative design process for integration of the development into its surroundings.
55. The LVA states that the typography of the development study area to the south of the A2 as being hilly with steep south facing slopes overlooking Dover, whereas to the north of the A2 the landform comprises gentle ridges and valleys flowing in a north-east to south-west direction. The development area doesn't contain or lie adjacent to any Scheduled Monuments, Registered Parks and Gardens or Conservation Areas. There are no Sites of Special Scientific Interest (SSSI) within the proposed development study area (with the closest being some 2km away) and the nearest ancient woodland is approximately 1.2km to the north-west. The Kent Downs Area of Outstanding Natural Beauty (AONB) lies to the south-west of Section 2, some 670m away. An assessment of National, County, District and Local Character Areas for the development study area are provided in the appraisal, along with the character of the night sky. Visual appraisal photographs from 15 representative viewpoints (to which the public have access) and 3 viewpoints relating to night sky views are also provided in the report and these locations were identified in consultation with Dover District Council.
56. The report states that the proposed development is located in an area which is not covered by any landscape designations, and does not exhibit any rare or unusual landscape features, and is within a localised landscape which is already influenced by existing built form and infrastructure. The proposed scheme has included measures embedded in the design to mitigate against the impact of the development and these include skewing the alignment of the A2 overbridge to enable incorporating gentler slopes on the embankments for new woodland planting to visually contain the most

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

elevated parts of the development; new woodland planting to create habitat for wildlife to provide green visual containment; new specimen tree planting to enhance visual appeal and integrate the development into the surrounding; new hedgerow planting to enhance visual amenity of the development and respond to the local character; and areas of wildflower grassland and bulb planting to enhance biodiversity along with visual appeal. Such landscaping and its ongoing maintenance would need to be conditioned on any planning consent given to ensure the proposed mitigation is actually delivered.

57. The assessment made of the scheme in terms of construction activities on both visual amenity and effect on landscape character areas is described as major and moderate adverse respectively, as it is for the operational impact at year 1, with a suggested reduction of the impact to moderate adverse for visual amenity once the planting has matured (year 15). However, it should be clarified that this assessment has been made against a current baseline of on-site conditions where clearly the proposed road and overbridge would change the character and visual appearance of the existing agricultural fields significantly. What needs to be borne in mind is that the areas through which this road would be constructed are both subject to development allocations in the Local Plan (i.e. for Whitfield Urban Expansion and the White Cliffs Business Park) therefore the change should also be considered against the baseline of anticipated future development, which has been adopted by Dover DC.
58. In terms of night sky impact the proposed lighting of the Fastrack road is considered in the context of the existing glare of lighting from a number of sources including high level floodlights at White Cliffs Business Park, lighting of retail and office use buildings on the business park and along Honeywood Parkway, road lighting along the A2, and road lighting in the residential areas of Newlands, Archers Court and the new residential area of Richmond Park. The lighting scheme would incorporate 10m high columns mounted with directional heads spaced out along the two stretches of road, which are necessary to provide a safe and attractive environment for users, to aid safe movement and a feeling of security and wellbeing. The lights would utilise a neutral white light and light shields to limit light to the rear. Given that the darkness of the sky is already notably reduced in the vicinity of the proposed development it is considered that the impact of introducing further light sources would not be significant, especially when combined with the mitigation measures proposed, and the design and specification of the lighting itself.
59. Policy DM16 of the Core Strategy states that the adverse effects of the proposed development should only be permitted if it is in accordance with the development plan document and incorporates necessary avoidance and mitigation measures; and it has been sited to avoid or reduce the harm through the incorporation of design measures to mitigate impacts to an acceptable level. It is considered that the design proposals to mitigate the development seek to comply with this policy, and the road scheme is part of an adopted strategy by the District Council. Furthermore, the NPPF in paragraph 127 states that planning decisions should ensure that developments are sympathetic to local character and landscape setting, whilst not preventing or discouraging appropriate innovation or change. Although there would be an impact as a result of the proposed development in visual amenity and landscape character terms, it would provide a sustainable transport solution which would be considered an appropriate innovation and would be delivered alongside the housing and employment allocations noted above. It is therefore considered that the merits of the development would overcome the adverse effects on landscape.

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

60. In considering the proposed development Dover District Council (DDC) have commented that the link road to the north of the A2 (Section 1) would be a highway that would ordinarily be expected to be provided through a residential development and consequently they have no concerns regarding the visual appearance of the road or its potential impacts on existing or future occupiers. The bridge over the A2 would, they comment, be a highly prominent feature, but would be viewed in the context of the existing residential development to the north-west, the A2 (including the roundabout to the west and the dumbbell roundabout to the east) and the commercial buildings to the south of the A2. Within this setting they state that the bridge would not appear out of context. They also state that Section 2 of the road, running through the Business Park, would be less sensitive to visual effects, DDC state, it being flatter and further from residential properties than Section 1.
61. Natural England were also consulted on the planning application and in their response noted the proximity of the proposed development to the Kent Downs AONB. The Kent Downs AONB Unit were consulted on the application, however no response was provided and it is considered that whilst nearby, the AONB would not be unacceptably affected by the development.
62. In terms of landscape and visual impact, the discussion above acknowledges that the proposed development would have an impact. However, the development facilitates the implementation of the Dover Fastrack scheme as supported by development plan policy and in this case it is considered that the benefit and merits of this scheme would outweigh the impacts. It is considered that the development would accord with Policy DM15 for protection of the countryside in that the scheme is in accordance with an allocation in the development plan, and cannot be accommodated elsewhere; and it would accord with Policy DM16 for landscape character as again it reflects an allocation in the local plan and incorporates mitigation measures to offset the impact.

Impact on residential Amenity

63. In terms of impact on residential amenity, the proposed development would have the greatest effect on properties in Newlands, whose rear gardens back onto the proposed embankment for the bridge over the A2. The rear boundaries of these properties would be approximately 10-12m away from the base of the embankment and approximately 40m to the raised footway and cycleway along the edge of the road (although this varies slightly from property to property due to layout). Given these distances it is considered that there would not be any unacceptable degree of overlooking caused. However due to the open nature of the current layout (agricultural fields) there may be a *perception* of overlooking experienced by these occupants. It is considered that the proposed landscaping of the embankment, which would include trees that are expected to grow to heights of around 8m, would help address this perception, such that in the short term it would be limited and in the medium to long term would likely be negligible. It should also be recognised that the status quo would not be retained given that the whole area to the rear of these properties falls within the Whitfield Urban Expansion allocation.
64. The proposed road would be lit along both sections with 10 high columns which also has the potential to impact residential amenity. Light spillage plans were submitted with the application (along with a lighting technical note) and these illustrate the limited wider

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

spill of light which is as a result of the directional mountings, which are aimed at the carriageway rather than the surrounding area. Importantly these drawings show that the light spill would not extend as far as the Newlands residential properties or gardens. Similarly, the lighting spill drawings illustrate that the lighting of Section 2 of the scheme would not extend as far as any of the existing residential properties on Dover Road. The application states that the lighting scheme has been designed to be sensitive to bats and this will be considered further in the ecology section below.

65. It is therefore considered that the proposed development would not have an unacceptable adverse impact on the residential amenity of existing residents and would accord with paragraph 127 of the NPPF.

Public Rights of Way

66. As set out in the proposals section above, the proposed development would affect two existing Public Rights of Way (PROW). For Section 1 the development would require the diversion of footpath ER54 as the new road would dissect its current route. In order to address this the footpath would be routed across the proposed road via an uncontrolled crossing point (gated on the eastern side of the road) and would then turn south-westwards within the post and wire fence enclosure of the road and landscaping. The route of the PROW would then proceed in a westerly direction to the north of the drainage 'Biobasin', and then run around the bottom of the embankment until it meets the existing footpath ER71 which runs along the rear of the back gardens of the properties in Newlands.
67. In Section 2 the proposed road would dissect the route of PROW ER60, which as set out in the proposals section is a Byway Open to All Traffic (BOAT) and forms part of the North Downs Way National Trail. No diversion of this route is required, but the development would make provision for the BOAT to cross the new road with gated accesses provided in the fencing which is proposed either side of the road, and an equestrian waiting area.
68. The applicant engaged with the County Council's Public Rights of Way Team prior to the planning application being submitted and the impact of the proposed development on the public rights of way have been discussed with them to agree an appropriate way forward. An application to divert PROW ER54 has also been made simultaneously to the Public Rights of Way Authority alongside this planning application. In response to the formal planning consultation the PROW team have confirmed that they have no objection to the development as proposed in relation to the public rights of way, but have requested the imposition of a condition requiring a PROW Management Scheme to be submitted (to include details of matters such as surfacing, width, signage, alignment and the two crossings), along with an informative which reminds the applicant about the timescales required if any temporary closure during construction works is required. They also note that noise and air quality impacts of the development should be taken into account, and the need for landscape improvements to lessen the impact of the scheme on the rights of way. These matters are addressed in the relevant sections of this report. It is therefore considered that in this regard the application would be acceptable and would accord with the protection measures outlined in paragraph 98 of the NPPF.

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

Air Quality

69. The application has been supported by an Air Quality Assessment which set out the legislation against which the assessment was undertaken. The document has screened the operational traffic data associated with the development and this screening has determined that the changes in traffic between the 'with Proposed Development' and 'without Proposed Development' scenarios are well below the Design Manual for Roads and Bridges (DMRB) LA 105 Air Quality scoping criteria for significant impacts. This was due to the proposed number of vehicle movements being limited to a maximum of 152 buses per day (as explained above) and that no other changes in traffic would occur as a result of the two new stretches of road. Therefore, the need for operational traffic air quality was scoped out of the assessment.
70. In addition the construction activities for the proposed development are programmed over a period of 18 months and according to the DMRB LA 105 guidance, if the period of construction is less than 2 years it is unlikely that there would be any significant air quality impacts due to construction traffic, therefore this was also scoped out of the assessment. Finally, and also in line with the DMRB guidance, the air quality assessment noted that during the construction phase for dust and particulate matter (PM₁₀ and PM_{2.5}) the effects beyond 200m from the construction site boundary are expected to be insignificant and were also scoped out.
71. The report therefore assessed the temporary increase in dust and particulate matter (PM₁₀ and PM_{2.5}) concentrations due to on-site activities undertaken during the construction phase of the proposed development, which would have potential to impact local air quality. The assessment identified 53 receptors located within 50m of the proposed construction site boundary, therefore the environmental sensitivity of the buffer zone was considered to be 'high'. However the report finds that through good site practice and the implementation of suitable mitigation measures, the effect of dust and PM₁₀ releases would be significantly reduced. The mitigation measures proposed in the report are based on best practice guidance published by the Institute of Air Quality Management and would include (but not exhaustively) the preparation of a Dust Management Plan; that machinery and dust causing activities be located away from receptors; avoiding site runoff of water or mud; removing materials from site as soon as possible; ensuring vehicle engines are switched off when stationary and avoiding the use of diesel or petrol powered generators where possible; using enclosed chutes, conveyors or skips; and avoiding bonfires and burning of waste material etc. Subject to the implementation of such mitigation measures, the report concludes that the residual effects of dust and particulate matter by construction activities on air quality would be considered insignificant.
72. The County Councils air quality consultants have considered the documentation submitted in relation to the proposed development and state that they are in agreement with the assessment made for construction dust impacts and the conclusions regarding this, and are also satisfied with the impacts scoped out of the assessment and the rationale for this. They therefore consider that air quality has been suitably assessed for the proposed development and that subject to the mitigation measures recommended within the report being implemented, they would require no further assessment to be undertaken and raise no objection to the application. These mitigation measures can be secured by condition and are incorporated into the recommendation below

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

Noise

73. The application has been supported by the submission of a Noise Impact Assessment Report which considers the potential noise impacts of the development during both the construction and operational phases. The potential for vibration impacts during construction was also considered in the report, but vibration impacts during operation was scoped out of the assessment. This is because the Highways England document Design Manual for Roads and Bridges (DMRB) advises that where a road surface is free of irregularities and under general maintenance, vibration from road traffic noise does not have the potential to have significant adverse effects. The type, source and potential impacts are identified in the report and the measures that would be employed to minimise them are set out.
74. The study area of the report focused on the closest potential noise and vibration sensitive receptors to the proposed scheme, where typical impacts would be worst and hence all potentially significant effects would be identified. The study area was limited to a distance of 300m from the scheme for noise predictions and 100m for vibration impacts in accordance with British Standard Guidance 5228 - Code of Practice for Noise and Vibration Control on Construction and Open Sites. The document also notes that the proposed dwellings which form part of the Whitfield Urban Expansion have also been scoped out of the assessment. This is due to the fact that the proposed Fastrack scheme and the housing development would be developed simultaneously, therefore it would not be appropriate to determine a 'before' scheme noise level and therefore be able to assess a change in noise levels. Furthermore, the planning consents for the housing are subject to their own requirement for suitable noise mitigation to provide acceptable noise levels within the dwellings.
75. During the construction period details are provided in the Noise Assessment of the impact from distinct activities such as site clearance, earthworks, bridge construction and highway works, including specific reference to the fact the bridge construction is required to be primarily carried out at night-time. The report notes that there is the risk of significant adverse impacts during the construction period with noise limits exceeded at times during certain construction activities, especially the night-time bridge works. To mitigate against the impact of construction activities, a Construction Environmental Management Plan (CEMP) would need to be prepared and implemented by the construction contractors, to minimise noise impacts. In terms of vibration impact, the report found that during construction, when vibratory rollers or compacts are used within close proximity to residential properties there would be a risk of disturbance from vibration, and therefore the CEMP would need to detail measures to minimise these impacts, such as advance notification to residents of work with the potential to generate levels of vibration which may cause annoyance, and not to start up or shut down equipment within 50m of any receptors. It is noted, however, that vibration levels are predicted to be below those associated with building damage. The provision of a CEMP to address these impacts would be secured via a condition on any consent given.
76. During the operational phase the assessment indicates that the predicted noise levels at the closest receptors (in Newlands, Aspen Drive and Guston) during the daytime period (07:00-23:00) would all be below or equal to the existing ambient noise level in those areas, and are therefore acceptable. For the period of night-time hours (23:00-07:00) the internal noise levels are met for the closest noise receptors for Section 1 of the road.

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

For the receptors close to Section 2 of the road the existing noise levels are exceeded by between 4 and 9dB and the report states that the internal noise limits are also likely to be exceeded, although it goes on to note that internal noise levels at the receptors closest to Dover Road already exceed internal noise limits for sleeping due to existing road traffic. A key mitigating factor is that the bus service would only be operational until midnight, with the service resuming at 5am, therefore it would not run throughout the whole of the 'usual' night-time period of 11pm to 7am. The assessment therefore considered the likely impact between the hours of 11pm and midnight and as a worst case scenario of 8 buses per hour, although it is likely that numbers may be lower as the service tails off and ends for the day. For this period the assessment predicts that the internal noise limits would be between 1 and 3dB below the LAMax limit given in the Professional Practice Guidance Internal Noise Guidance.

77. The County Council's Noise Consultants have considered the Noise Assessment and details provided and have advised that they concur with the methodology being used to assess noise impact and subsequently the findings of the report. They raise no objection to the application, subject to the imposition of a condition to secure the CEMP which would outline the mitigation measures required to address any noise impact. Furthermore, they welcome the applicants view that a Section 61 prior consent agreement under the Control of Pollution Act should be applied for in relation to any night-time works associated with the bridge construction. Although night-time construction of the bridge has the potential for an adverse impact on residents, they acknowledge that this work would be unavoidable due to the potential for a severe impact on traffic congestion if carried out during the daytime. The applicants have confirmed that the CEMP would include a Section 61 agreement between the Contractor and the Environmental Health Officer at Dover DC and this would be required to set out in detail the dates, timings and duration of works, the plant and equipment to be used, predicted noise levels associated with the works and measures to be implemented to minimise the disruption of noise on local residents. The applicant has advised that night-time works would generally be limited to works affecting the A2, and primarily road closures for the lifting of the bridge and any associated finishing works on the structure such as parapets. All other works would be undertaken during standard daytime construction hours (to be conditioned within the CEMP) and the contractor would be required to manage the generation of construction noise and vibration under Section 72 of the Control of Pollution Act. The applicant has advised that it is likely there would be lane closures and narrow lanes in place during the construction phase of the bridge, which would enable most of the bridge supports/abutments to be built during daytime working hours. Specific noise and vibration mitigation measures to be implemented during the works would also be set out in the CEMP, including the provision of acoustic enclosures round static plant where necessary, the use of broadband reversing alarms (more directional than the two tone beeping alarms, therefore causing less nuisance), and no start-up/shut down of vibratory plant within 50m of sensitive receptors. Impact piling typically associated with high noise levels generated by the impact of a hammer driving piles into the ground would not be used for this development.
78. It is therefore considered that the application would not result in an adverse impact in relation to noise during the operational phase, and that any impacts during construction would be dealt with through good construction management processes and enforced through adherence to an approved CEMP. Although impacts are identified, it is considered that the wider benefits of providing the road and Fastrack bus service would

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

off-set the temporary construction impacts, and therefore the scheme is considered to be acceptable in this regard.

Ecological Impacts

79. The application has been supported by a number of documents which seek to address the potential impact of the proposed development on matters of ecology and biodiversity, including Information to Inform Habitats Regulations Assessment, Preliminary Ecological Appraisal, Ecological Mitigation Strategy, Preliminary Bat Roost Assessment, Reptile Survey Report, and Great Crested Newt results. These documents have all been considered by the County Council's Biodiversity Team and Natural England were also consulted on the application.
80. Under the requirements of the European Council Directives for Habitats and Wild Birds it is necessary to consider whether the proposed development would have any significant effects upon areas of nature conservation importance designated or classified under the Directives. The Report to Inform Habitats Regulations Assessment identified four European sites within 10km of the application site, these being:
- Dover to Kingsdown Cliffs Special Area of Conservation (SAC) (1.5km south east of Section 2)
 - Lydden and Temple Ewell Downs SAC (1.6km west of Section 1)
 - Folkestone to Etchinghill Escarpment SAC (9.8km south west of Section 1)
 - Thanet Coast and Sandwich Bay Ramsar (8.2km north east of Section 1).

As a result, a Stage 1 screening for the Habitats Regulations Assessment was undertaken and submitted, which identified that the highest risk was considered to be air pollution to Dover to Kingsdown Cliffs SAC and Lydden and Temple Ewell Downs SAC. However the project is designed to reduce or maintain traffic flows in the area by seeking to divert new local residents to bus travel instead of car travel and is therefore assessed as not likely to generate sufficient emissions so as to have an effect. Therefore, it was considered that an operational traffic air quality assessment would not be required and this was scoped out of the assessment. No in-combination effects were identified as being likely to occur and in fact the project is identified as part of a suite of measures to alleviate air pollution effects. The KCC Biodiversity Officer has noted that taking into account the type and scope of the development and the distance to and qualifying features of the European sites, she is satisfied with the conclusion of no likely significant effect and the screening out of any impacts. Natural England have also raised no objection to the application.

81. The Preliminary Ecological Appraisal (PEA) outlines the protected species which may utilise the site and further survey work was undertaken to assess the effects and inform any mitigation or licensing requirements. The PEA states that the habitats on both sections of the proposed development have the potential to support a range of protected species, including bats (roosting and foraging/commuting), other mammals, breeding birds, reptiles and amphibians. The limited extent of the habitats and their relative isolation, however, means many effects can be avoided or mitigated using precautionary methods.

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

82. Bats: Two trees were identified with moderate bat roosting suitability, however the plans indicate that these trees would be retained and would be of sufficient distance from the proposed scheme, such that any impacts can be screened out. Five trees and one group of trees have been assigned a low suitability for roosting bats, and the Biodiversity Officer notes that whilst no further survey work is required, precautionary methods of felling should be employed to further minimise the risk to this species group. An informative reminding the applicants of this could be imposed on any consent given. The Ecological Mitigation Strategy (EMS) has outlined the required mitigation and demonstrates widescale planting which includes wildflower planting, woodland creation, new hedgerow, and scattered trees which would provide habitat for bat foraging and commuting. The Biodiversity Officer has confirmed that if these measures are implemented, appropriate mitigation and enhancement can be provided for bats. As lighting can be detrimental to roosting, foraging and commuting bats, a lighting strategy has been included in the EMS and the Biodiversity Officer has confirmed that she is satisfied that this would be appropriate. A condition to secure an appropriate lighting design has been recommended, which should accord with the recommendations from the Bat Conservation Trust and the institute of Lighting Professionals, titled Guidance Note 8 Bats and Artificial Lighting.
83. Reptiles: Reptile surveys were undertaken for both sections of the road and no reptiles were recorded. However, the habitat is considered as suitable for reptiles therefore a precautionary methodology is provided, which includes clearance on site outside of the reptile hibernation period, the removal of suitable refuges prior to clearance and the hand strimming of suitable areas. The Biodiversity Officer concurs with these recommendations and considers them appropriate. She states that the hibernation period for reptiles is approximately October to March but it can vary depending on the weather conditions, therefore exact timings of when the works would be carried out should therefore be decided by an ecological clerk of works, and this is included in the recommendation section.
84. Great Crested Newts: The PEA identified the presence of habitat which could support great crested newts with one pond identified within the Section 1 survey area and another approximately 40m north of the Section 2 survey area. Subsequently the two waterbodies were subjected to environmental DNA (eDNA) analysis and the results of this indicated an absence of great crested newts. No further surveys or mitigation measures are therefore required for this species and they are considered not to be a constraint on the development.
85. Badgers: A subsidiary badger sett was recorded within Section 2 of the proposed development in close proximity of the route (28m). The proposed route has been refined such that construction would be 30m away from the sett, and the report notes that badger specific working methods would be employed in the vicinity of the sett. If these measures cannot be employed then the Biodiversity Officer notes that it would be necessary for a temporary sett closure licence from Natural England to be applied for. Suggestions for the protection of badgers on site have been proposed which the Biodiversity Officer is generally supportive of, but she stresses that permeability of the site is important in close proximity to the sett and therefore if fencing is required it should be suitably designed so it does not prevent badger movement. Also, badgers are highly active and therefore the location of the badger sett/usage of the badger sett may change by the time construction work starts. To ensure the proposed mitigation is still valid it is

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

advised that an updated badger survey (for Section 2) is required prior to commencement of development, and this and the fencing could be covered by conditions.

86. Breeding birds: The Biodiversity Officer has agreed that a full breeding bird survey would not be required due to the size of the site, however a precautionary mitigation methodology should be adhered to to prevent any offences being committed. Any works to vegetation that may provide suitable habitats should therefore be carried out outside of the bird breeding season (March to August) to avoid destroying or damaging bird nests in use or being built. If any vegetation needs to be removed during the breeding season then examination must be carried out by an experienced ecologist prior to works starting. An informative to reflect this advice is proposed. Any hedgerows and trees that are to be retained within the proposed development area should be protected during construction in line with standard arboriculture best practice and a condition to this effect is proposed.
87. Ecological enhancement measures are set out in the EMS which include native species planting and habitat creation and the installation of bat and bird nest boxes and habitat features for small mammals, amphibians and invertebrates. A Landscape Management and Maintenance Plan has also been submitted which outlines how the ecological features on the site would be managed and maintained for maximum ecological benefit. The Biodiversity Officer has confirmed that these measures in relation to the proposed woodland, hedgerows and wildflower meadows are appropriate and the management should be implemented throughout the operational period of the proposed development, and a condition is recommended to this effect.
88. In summary it is considered that in relation to all ecological matters outlined above the proposed development is considered acceptable subject to the suggested conditions and precautionary working methods. As such it would comply with the guidance of the NPPF (specifically paragraph 170) and Core Strategy Policy DM15.

Biodiversity Net Gain

89. Biodiversity Net Gain (BNG) is one of the key objectives being brought forward by the Environment Bill 2019. The bill was introduced by Parliament on 15th October 2019 and is aimed at tackling the biggest environmental priorities of our time, signalling a step change in the way the natural environment is protected and enhanced. At the point of submission of the application the Environment Bill has not been made into law, accordingly the applicant has adopted best practice measures, in acknowledgment of the forthcoming changes, to provide BNG as part of the proposed development. A Biodiversity Net Gain Assessment was submitted in support of the application.
90. BNG is the result of a process applied to development so that there is an overall positive outcome for biodiversity. The process follows the mitigation hierarchy, which sets out that everything possible must be done to firstly avoid, secondly minimise and thirdly restore/rehabilitate losses of biodiversity on-site. The Natural England Biodiversity Metric 2.0 has been used to quantify the biodiversity values of existing habitats present on site and those proposed under the current design of the post-development landscape design.

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

91. The BNG report states that the proposed development would result in a net gain of 28.10% in area-based Habitat Units and 25.16% in Hedgerow Units. As such the scheme would achieve a quantitative scheme-wide biodiversity net gain and would surpass the 10% minimum requirement of BNG associated with the emerging Environment Act. The BNG report also outlines how the proposed development adheres to the 10 BNG Good Practice Principles and states that it would achieve all of these, which are listed as: applying the mitigation hierarchy; avoiding the loss of biodiversity that cannot be offset by gains elsewhere; to be inclusive and equitable; to address risks; to make a measurable net gain contribution; to achieve the best outcome for biodiversity; to be additional; to create a net gain legacy; to optimise sustainability; and to be transparent.

Arboriculture

92. In addition to the landscape and visual impact section above it should be noted that the application has been supported by the submission of a tree survey and arboricultural report, which outlined which trees would be affected by the proposed development and mitigation measures to protect those that would be retained. A single Tree Preservation Order was identified as covering three groups of trees and one woodland within the study area, but no trees protected by this order would be removed. The proposed development would result in the removal of 15 trees, three B category tree groups being part removed and one B category wooded area being part removed. The adverse impacts associated with the removal of the trees, tree groups and wooded areas are proposed to be offset by the proposed landscaping, which would provide additional tree planting, hedgerows, wildflower grassland, bulbs and orchards along with the establishment of woodland. To ensure the proposed landscaping is properly looked after to ensure it establishes well, a Landscape, Management and Maintenance plan has been submitted. Tree protection measures are proposed for those features that would be retained on site to ensure they are protected during construction.

Archaeological and Heritage Impacts

93. The application was supported by the submission of an Historic Environment Desk Based Assessment (HEDBA) of the site covering both sections of the road scheme. The study looked at both buried heritage assets (archaeological remains) and above ground heritage assets (structures and landscapes of heritage interest) within or immediately adjoining the site. It also considered the impact of the scheme on the historic character and setting of designated and non-designated assets within and beyond the site (e.g. views to and from listed buildings and conservation areas).
94. The HEDBA identified that above ground heritage assets that may be affected by the scheme comprised both designated and non-designated assets within the site boundary, directly adjacent and also within the wider vicinity, where setting is a consideration. These included Fort Burgoyne scheduled monument which lies 665m to the south-east of Section 2 and Dover Castle scheduled monument which lies 1.2km to the south. Duke of York's Military School and a non-designated railway air shaft lie close to the access point of Section 2 onto Dover Road. The Military school lodge gates lie approximately 70m from the proposed access onto Dover Road and the air shaft 55m away. The HEDBA states that the proposals (specifically the access of Section 2 of the road onto Dover Road) would result in less than substantial harm to the Grade II listed

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

West Entrance Lodge Gates of the Duke of York's Military school. It also notes that due to the nature of the road scheme no mitigation has been proposed that can reduce the effect entirely as the road would cut across the current rural landscape affecting views from the lodge gates.

95. No other significant effects are identified by the HEDBA in respect of the designated heritage assets. Views of the proposed new road from Dover Castle and Fort Burgoyne would be too distant and the un-designated railway air shaft would not be physically affected by the proposals. The report notes that a Construction Environmental Management Plan (CEMP) could be used to put in place measures to deal with potential dust, vibration and strike damage during construction.
96. In terms of buried heritage assets, the HEDBA notes that there have been a considerable number (48) of past archaeological investigations within the study area and three within the site, mostly associated with the White Cliffs Business Park. These have recorded evidence of prehistoric and Roman activity in the form of Lower Palaeolithic artefacts and isolated cut features associated with agricultural activity. In support of the current planning application an archaeological geophysical survey was carried out for both sections and revealed no remains of clear prehistoric or Roman origin. However, the report notes that clay geology is not conducive to this method of survey and features of archaeological interest, in particular flint concentrations, may not have been identified.
97. Potential archaeological assets that may be affected by the two sections of road include prehistoric remains, Roman remains including possible cremation burials, post medieval remains, and previously unrecorded 20th Century military remains. The report suggests that archaeological survival is predicted to be high across the majority of the site based on the lack of previous development, other than localised impacts from the construction of existing highways, modern ploughing and possibly historic quarrying activity. The likely impact to archaeological remains would be from the initial site wide topsoil strip for the new road sections, construction compounds and from the excavation for the drainage features. Additional impacts as a result of piling, landscaping and the insertion of services is also noted.
98. The County Council's archaeologist has been consulted on the planning application and confirmed that the scope of the assessment and survey works were agreed with him during pre-application advice which had been sought by the applicant. He notes that the HEDBA includes a comprehensive account of the area and the potential for archaeological remains to be present within the development site. In his consultee response he states that he agrees with the assessment provided but would also include the potential for archaeological remains associated with World War I period military activity, including remains relating to a wider system of field defences erected around the port town of Dover and remains of practice fieldworks associated with soldiers camped/accommodated in the area.
99. The HEDBA makes recommendations for any previously unrecorded archaeological assets to be preserved by means of a programme of archaeological investigation, for example 'strip, map and sample' during the preliminary site strip at the start of the enabling works/construction phase. The County archaeologist states that he concurs with the recommendations of the HEDBA and therefore raises no objection to the

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

development subject to the imposition of conditions to secure this work. These would include the need to secure the implementation of a programme of archaeological work in accordance with a written specification and timetable to be approved by the County Planning Authority (prior to the commencement of development) and one to provide a Post Excavation Assessment Report for approval within 9 months of the completion on site.

100. The County Council's Conservation Officer was also consulted in relation to the planning application and provided comments in relation to the proposed scheme, where he also concurred with the findings of the HEDBA in that the proposals would result in less than substantial harm to the above ground assets.
101. Given the findings of the HEDBA and the views of the County archaeologist and Conservation Officer, it is considered that the development would accord with the guidance of the NPPF, specifically paragraph 190.

Flood Risk and Drainage

102. The application has been supported by the submission of a Flood Risk Assessment. The proposed development would be located on greenfield land which is located in Flood Zone 1. Based on Table 2: Flood Risk vulnerability classification in the PPG to the NPPF, the proposed development would be classified as 'Essential Infrastructure'. Under the NPPF all types of land uses are considered appropriate in Flood Zone 1. Flood risk from coastal & tidal and fluvial sources at the site is considered to be Negligible and Very Low respectively, and flood risk from groundwater sources is also considered to be Very Low. Flood risk from sewer and drainage infrastructure is considered to be Medium, however the FRA notes that there are no records of flooding affecting the site directly and the inclusion of a sustainable surface water drainage strategy would ensure that there would be no increase to flood risk. All of Section 2 has a Very Low Risk of flooding from overland sources, and whilst the majority of Section 1 is the same, there is an area where the overland flow flood risk needs to be mitigated against.
103. The mitigation proposed for this is the provision of a swale adjacent to the northern edge of Section 1 of the road to intercept flows emanating from the west and direct them further downstream to re-join the existing overland route. The County Council's Flood and Water Management Team have considered the details submitted in the Flood Risk Assessment which included a detailed surface water drainage strategy (as described in the proposals section above). They note that the proposals utilise a combination of swales and balancing ponds along the length of the carriageway which accept both the surface water from the road and also intercept and divert the overland flow path via a culvert to continue through to the Halsbury Homes site as the existing flow path. They note that a condition requiring the submission of a surface water drainage scheme based on that set out on the FRA to demonstrate that the surface water generated by the development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and dispersed of without increase to flood risk on or off-site would be required for Section 1 of the proposed road. Sufficient information has been included in the FRA for Section 2 of the scheme, therefore a separate compliance condition has been included for this section in relation to surface water drainage. Secondly a verification report for both sections of the

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

road would be required prior to the road being bought into use, to demonstrate the modelled operation of the scheme, and this would need to be agreed by the County Planning Authority. Subject to these conditions, no objection is raised to the development on drainage or flooding grounds, and the scheme is considered to accord with the guidance of the NPPF.

Contamination Impacts

104. The planning application has been supported in relation to assessing its impact on ground contamination by a Preliminary Risk Assessment and a Coal Mining Report. As noted earlier in the report the site area for both sections is predominantly agricultural land. The site has been developed over time with pits being quarried (1898 and 1908) before being backfilled (1961 and 1981), and historical mapping shows a Roman road running through section 2 (now the North Downs Way National Trail) as well as the air shaft associated with the rail tunnel. Historically the surrounding areas are also agricultural with more recent commercial, industrial and residential uses. According to the Coal Authority both sections are located within an area where coal mining has been reported, however no mine entries, potential zones of influence, surface mining, shallow coal workings or probable shallow coal workings fall within 1km of the site. The proposed development is within source protection zone 3 and located upon a principle aquifer therefore controlled waters are particularly sensitive.
105. The Preliminary Risk Assessment identified a series of low or low-moderate risks associated with the construction works in relation to matters such as the risk to future site users, risk from ground gas to third party neighbours, risk to surface water, risk to groundwater and risk to underground structures. A moderate risk to construction workers was found due to the potential for direct contact with contaminated soils, groundwater or ground gas, and a high risk was found in relation to the potential for unexploded ordnance. However, such risks would be managed through the relevant health and safety legislation and protocols. The Environment Agency (EA) has considered the information provided and concurs that the risks posed could be managed, in particular with regard to the risks to controlled waters, however additional information would need to be secured via a planning condition prior to construction being undertaken. A 'pre-commencement' condition requiring this information to be submitted was requested by the EA, however the applicant has sought to provide this information now, to avoid the need to discharge a condition before construction can begin. The EA have been consulted on this additional information, which provided a Quantitative Risk Assessment of the site and they have agreed that the information submitted is acceptable, and therefore any consent should now be conditioned to be carried out in accordance with this document. As a result further conditions are required by the EA which would include the need to submit a verification report to demonstrate any remediation has been undertaken; that if any contamination is found which has not been identified then work should cease until a remediation strategy has been agreed; that no drainage systems for the infiltration of surface water to the ground are permitted without consent, and that piling should not be carried out without the consent of the County Planning Authority. Subject to these conditions, which are included in the recommendation below, the EA raise no objection to the development.
106. The Coal Authority were also consulted on the application and have confirmed that the application site falls within the defined 'Development Low Risk Area'. They have

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

therefore advised that the Coal Authority's 'Standing Advice' be brought to the attention of the applicant as an informative, in the interests of public health and safety. Such an informative is proposed and the applicant has already been made aware of this advice.

107. Given the above it is considered that the proposals would accord with the aims of Policy DM17 of the Core Strategy for the protection of groundwater sources, subject to the imposition of the conditions proposed above.

Construction

108. Given the proximity of the development site to neighbouring residential, commercial and retail premises and the scale of the proposals, the scheme would need to be constructed in accordance with a Construction Management Plan (CMP) which would set out measures to protect amenity and existing uses and roads. The CMP should include matters such as the hours of operation for construction; the number, frequency and routing of all construction and delivery vehicles accessing the site; parking and turning areas for construction and delivery vehicles and site personnel; timing of HGV movements (to avoid school drop off and pick up times); the provision of wheel washing and other facilities to prevent dust, dirt, detritus from entering the public highway (and a means to remove it if it occurs); and access arrangements. The CMP would also need to include the ecological mitigation requirements raised above such as the need for any ecological mitigation works to be implemented under an ecological watching brief and the need for fencing to be suitable for retaining badger connectivity on site.

109. A suitably worded condition to this effect has been suggested and it is proposed, for clarity, that the requirements of the CEMP (discussed above in relation to noise impacts and archaeology) and the CMP be incorporated into one condition/document for ease of reference for contractors and to ensure no matter gets overlooked.

Other Matters

110. The proposed Section 1 of the Fastrack scheme would be sited on land which is owned by Halsbury Homes and as noted above in the Representations section (paragraph 33), an objection was received from Halsbury Homes with regard to the planning application. Whilst some of the comments are a matter of opinion or preference it is considered important to address a number of the remarks made. Halsbury Homes state that the road appears to have been designed for high volumes of traffic and are concerned the road and bridge would be opened to all traffic. The road has been designed in accordance with the Design Manual for Roads and Buildings (DMRB), Manual for Streets (MfS), Manual for Street 2 (MfS2), and Kent County Council's design guidance, in line with its proposed use. The route would be controlled by bus gates and ANPR cameras and would accommodate eight buses an hour at its peak. The carriageway width and the width of the shared path match the design of the road corridor shown on the approved plans for the Whitfield Urban Expansion development. Notwithstanding this, the scheme is proposed to be subject to a condition (in line with a request by Highways England) which restricts use to buses, cyclists, pedestrians and emergency vehicles only.

111. Secondly they comment that the roads disregard already approved building plots for the Whitfield Urban Expansion. In response the applicants note that the road has been

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

widened compared to the masterplan at the points where the buses need to pass the pedestrian refuge islands, which results in a slight overlap between the previously consented permission and this proposed development. The swale and culvert proposed to manage overland surface water do take into account the attenuation basin shown as part of the reserved matters applications, and the applicant considers both can be implemented. Finally, the verge and cut off drain at the south-eastern side of the road would be a temporary measure. The verge would be replaced with a footway as the wider housing scheme is developed and the cut off drain superseded by whatever drainage is agreed for that development.

112. Dover DC (responsible for determination of the wider Whitfield housing development) commented in their response to this application that there were minor differences between the approved roads which formed part of the reserved matters applications which have been approved and the road proposed as part of this application. However, their view was that given the two alignments only differ marginally they did not consider the housing developments would be prejudiced by this application.
113. With regard to Halsbury Homes comments about the lack of compliance with the Special Area of Conservation mitigation and Green Infrastructure, again the layout differences are considered to be minor and would not prejudice any consented developments. The size of the surface water drainage basins are based on the infiltration rates of the chalk and therefore cannot be amended or reduced as requested by Halsbury Homes. Additional accesses onto Section 1 of the road would be determined as part of any future phases of housing development (to be determined by DDC), and therefore have not been shown at this stage.
114. Finally Halsbury Homes state that no agreement has been reached with themselves to acquire the land required for the Fastrack scheme, which would impact the delivery of the road, subsequently affect the funding, and that any compulsory purchase of the land would make the scheme unviable. The applicant, in response to this, has advised that they are actively negotiating with Halsbury Homes to secure agreement, but should it be necessary, in parallel KCC will be following a Compulsory Purchase Order (CPO) procedure, which Halsbury Homes are aware of. KCC (as applicant) are hopeful that agreement can be reached, but if not, the CPO procedure provides the certainty that the land can be secured in relation to the funding approval with Homes England.

White Cliffs Inland Border Facility

115. On 24th September 2020, the Secretary of State for Housing, Communities and Local Government made the following Order: The Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020. The Order applies to land in England within the areas specified in Schedule 1 of the Order, which includes the area administered by Kent County Council. The Special Development Order (SDO) grants temporary planning permission for development consisting of the use of land for the stationing and processing of vehicles (particularly goods vehicles) entering or leaving Great Britain, and the provision of associated temporary facilities and infrastructure. Development permitted by this Order can only be carried out by, or on behalf of, a border department named in the Order. The development must end by 31 December 2025, and all reinstatement works must have

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

been completed by 31 December 2026. SDO applications are submitted to and determined by Ministry of Housing, Communities and Local Government.

116. One of the Inland Border Facilities is proposed to be located on land at White Cliffs Business Park, Dover to the east of Section 2 of the Dover Fastrack scheme. We have been advised that public engagement on the White Cliffs Inland Border Facility will commence shortly. The Fastrack scheme would not compromise the Special Development Order proposal or vice versa.

Conclusion

117. This application proposes the construction of two new sections of road which would be utilised for a new Bus Rapid Transit (BRT) system called Dover Fastrack. The new sections of road would link the Whitfield Urban Expansion to the north of Dover to Dover Priory Railway Station via an overbridge across the A2, along Honeywood Parkway and then a route through White Cliffs Business Park linking to Dover Road. The proposal has given rise to a variety of planning issues including highway and transportation issues, landscape, visual amenity, noise and air quality, ecological matters, and general amenity concerns, along with the need for the development. These matters have been considered and addressed throughout this report and must be balanced against the strong strategic and policy support for the provision of a BRT scheme in Dover. The development would satisfy the local priority objectives of the County Council's 'Local Transport Plan 4: Delivering Growth without Gridlock'. Subject to planning permission the project stands to benefit from £16.1million of funding from Homes England through the Housing Infrastructure Fund – a material consideration for the purpose of determining this application. The proposed Inland Border Facility application would not be affected by the approval of the Fastrack Scheme and the Special Development Order, under which it is being applied for, would only allow a temporary use of the site until 31st December 2025 if permitted.

118. In determining development proposals, planning legislation states that applications must be determined in accordance with the development plan unless material considerations indicate otherwise, and the NPPF states that proposals that accord with an up-to-date Local Plan should be approved without delay. The proposed development specifically meets the aims of policies LA2 of the Land Allocations Plan (2015), and Policies CP6 and CP11 of the Dover Core Strategy (2010). Furthermore, it would accord with the Whitfield Urban Expansion Masterplan (2011) and is a priority public transport scheme listed in the Dover Transport Strategy 2007.

119. Having had due regard to the planning documents submitted as part of this application, the consultation responses received and representations made, I am of the opinion that the proposed development, subject to the conditions listed below, would not give rise to any material harm, is acceptable and is otherwise in accordance with the general aims and objectives of the relevant Development Plan Policies and the guidance contained within the NPPF. I therefore recommend that planning permission be granted.

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

Recommendation

120. I RECOMMEND that PERMISSION BE GRANTED, SUBJECT TO the imposition of conditions covering (amongst other matters) the following:

1. Development shall be begun within 3 years of the date of the permission.
2. Development to be carried out in accordance with the submitted details.
3. Prior to the commencement of either section of road details of all the proposed structures, including the overbridge, retaining walls, paving and hard surfaces, carriageway design and materials shall be submitted to the County Planning Authority for prior written approval.
4. Prior to their installation, details of the fences, railings and gates shall be submitted for the written approval of the County Planning Authority and thereafter implemented as approved and retained.
5. The implementation of the landscape design proposals as set out on drawing numbers DVFT-WSP-S1-XX-DR-L- 0101-0108 Rev P05 Landscape General Arrangement Plans 1-8, DVFT-WSP-S1-XX-DR-L-0201 Landscape Cross Section, and DVFT-WSP-12-XX-DR-L- 0202-0204 Rev P01 Typical Landscape Details, within the first planting season following the opening of each section of the road to ensure the visual impact of the development is softened through the landscaping proposed.
6. The replacement of any trees, shrubs hedges etc that are destroyed, dead or dying within 5 years of planting, with large nursery stock of the same species in the same places.
7. The Landscape Management and Maintenance Plan (WSP, July 2020) must be implemented as detailed for the lifetime of the development, and the management plan must be regularly reviewed and any updates to the management plan submitted to the County Planning Authority for written approval.
8. Tree protection measures for all trees and hedgerows to be retained on the development site shall be erected prior to the commencement of development and retained for the duration of the works.
9. Prior to the commencement of the development of each individual section, a Construction Environment Management Plan (CEMP) shall be submitted to the County Planning Authority for written approval, and development shall be carried out in accordance with this document. The CEMP shall include details of the scale, timing and mitigation of all construction related aspects of the development and include (but not limited to):
 - the required mitigation measures needed to control the potential nuisance from noise, dust, vibration and night-time bridge works including the need for a Section 61 prior consent agreement with Dover District Council under the Control of Pollution Act for night-time works associated with the bridge construction;
 - site hours of operation;
 - numbers, frequency and type of vehicles visiting the site;
 - travel plan and guided access/egress and parking arrangements for site works, visitors and deliveries;

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

- wheel washing and other facilities to prevent dust, dirt and detritus from entering the public highway (and means to remove it if it occurs)
 - potential dust, vibration and strike damage to heritage assets during construction;
 - details of the ecological mitigation to be written by an ecologist;
 - that the ecological mitigation works be implemented under an ecological watching brief and timings of works affecting biodiversity be decided by an ecological clerk of works;
 - that any fencing on site retains connectivity on site for badgers.
10. The scheme as approved, shall only be used for the purposes of buses, pedestrians, cycles and emergency vehicles, and shall not be used for any other vehicular traffic unless otherwise agreed in writing with the County Planning Authority.
 11. Within 3 months of the commencement of each Section of the development, a lighting strategy designed to meet the requirements of the lighting strategy within the Ecological Mitigation Strategy (WSP, July 2020) shall be submitted to the County Planning Authority and approved in writing. This shall include details of the lighting columns and hours of lighting operation.
 12. Prior to the commencement of development of Section 2 of the road, an updated badger survey must be carried out and the results of the survey and details of any new/additional ecological mitigation required must be submitted to the County Planning Authority for written approval.
 13. Prior to the commencement of the development of each individual Section the applicant, or their agents or successors in title, shall secure the implementation of a programme of archaeological work in accordance with a written specification (WSI) and timetable which has been submitted to and approved by the County Authority.
 14. Within 9 months of the completion on site of the archaeological mitigation works referred to in the above condition, a Post Excavation Assessment Report shall be submitted to the County Planning Authority for written approval.
 15. The development shall be carried out in accordance with the submitted document 'Dover Fastrack Sections 1 and 2 – Generic Quantitative Risk Assessment' (WSP, December 2020).
 16. Prior to any section of the road being brought into use, a verification report demonstrating completion of the works for that section, as set out in the agreed remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the County Planning Authority.
 17. If during development, contamination not previously identified is found to be present at the site then no further development shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the County Planning Authority.
 18. No drainage systems for the infiltration of surface water to the ground are permitted other than with the written approval of the County Planning Authority.
 19. Piling using penetrative methods shall not be carried out other than with the written approval of the County Planning Authority and having undertaken a Piling Risk Assessment.

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

20. Prior to the commencement of Section 1 of the road a sustainable surface water drainage scheme shall be submitted to (and approved in writing by) the County Planning Authority. The drainage scheme shall be based upon the submitted Flood Risk Assessment (WSP, August 2020) and shall demonstrate that the surface water generated by this development can be accommodated and disposed of without increase to flood risk on or off site.
21. Section 2 of the road shall be implemented in accordance with the details of the sustainable surface water drainage scheme contained within the submitted Flood Risk Assessment (WSP, August 2020).
22. The road (or each section of the road if developed separately) shall not become operational until a Verification Report, pertaining to the surface water drainage system, has been submitted to and approved in writing by the County Planning Authority.
23. The mitigation measures outlined in the WSP Air Quality Assessment report (reference DVFT-WSP-12-ZZ-RP-AQ-0001 dated August 2020) shall be implemented as set out.
24. Should any bunding/mounding be proposed, in addition to that shown on the application drawings, details must first be submitted to and approved in writing by the County Planning Authority.
25. Prior to their installation, details of the permanent bus shelters shall be submitted for the written approval of the County Planning Authority and thereafter implemented as approved and retained.
26. The development shall be carried out in accordance with the Biodiversity Net Gain Assessment, the Ecological Mitigation Strategy and the submitted plans to ensure the development achieves the scheme wide biodiversity net gain as set out.
27. Prior to the commencement of any works affecting the Public Rights of Way ER54 and ER60, a Public Right of Way Management Scheme shall be submitted to and approved in writing by the County Planning Authority, which shall include details of surfacing, width, signage, alignment and the two crossings, based on that shown on the plans hereby approved.

121. I FURTHER RECOMMEND that the following INFORMATIVES be added:

1. That the applicant ensures that all necessary highway approvals and consents are obtained;
2. That the applicant takes note of the Coal Authority's Standing Advice;
3. That the applicant ensures that the development is carried out in accordance with Network Rail's Asset Protection Informatives for works in close proximity to Network Rail's Infrastructure (updated guidance, dated January 2021);
4. That the applicant takes note of the Kent Police Designing Out Crime Officer general advice;
5. The applicant be reminded that if a temporary closure of a Public Right of Way is required there is a 6 week time frame to issue such, and that any temporary closure cannot be issued until a diversion order is confirmed, and that an alternative route must be constructed;

Item D1

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

6. The applicant be reminded that a Section 61 prior consent agreement under the Control of Pollution Act for night-time works associated with the bridge construction, as specified in the condition above, should be sought from Dover District Council;
7. Works should be carried out outside of the bird nesting season (March 1st to August 31st inclusive) unless approved by an ecologist;
8. The felling of trees identified as suitable for roosting bats should be undertaken in a precautionary manner to minimise any risks to this species group.

Case Officer: Mrs Helen Edwards

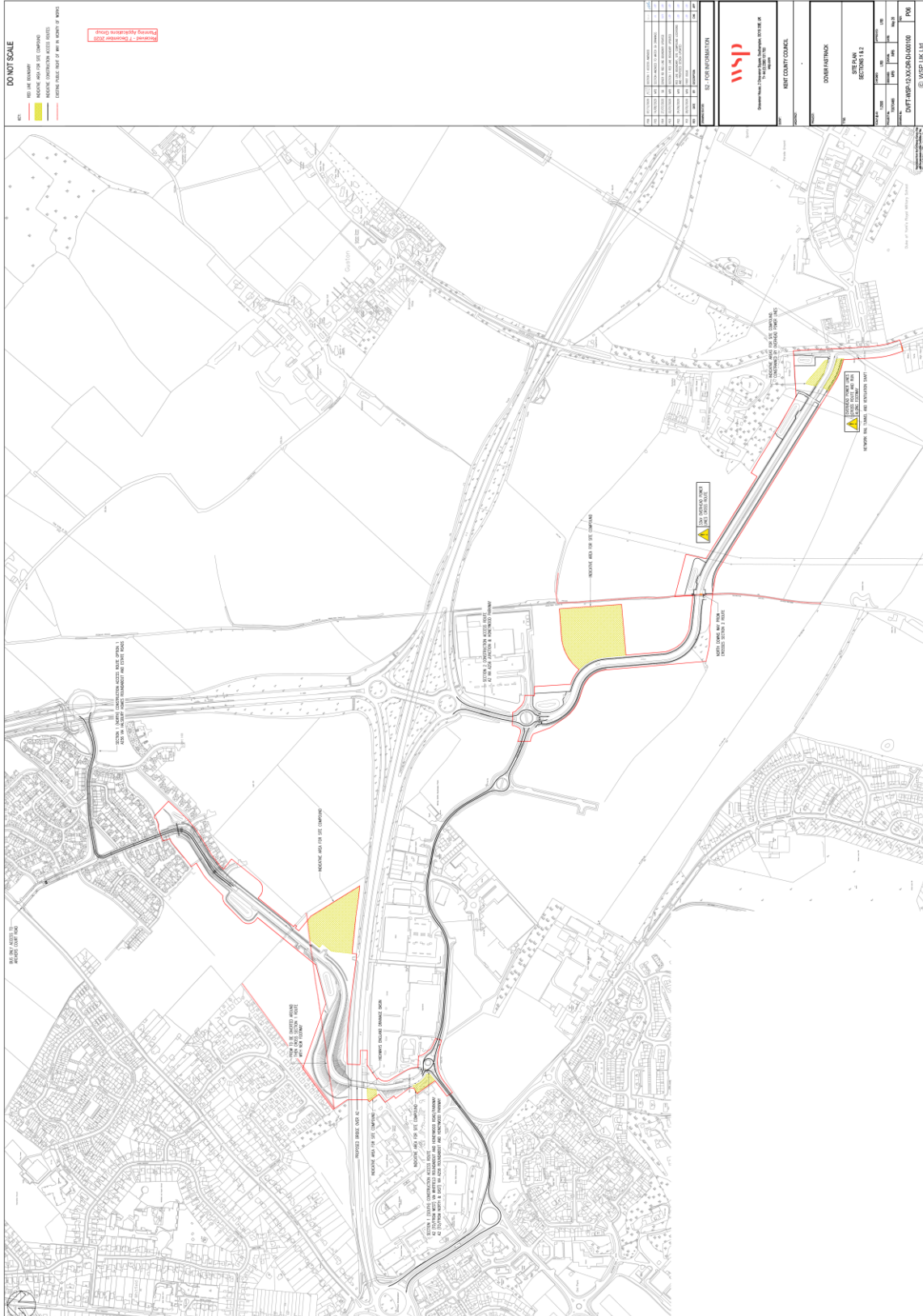
Tel. no: 03000 413366

Background Documents: see section heading

Item D1 Appendix 1 Application Plans

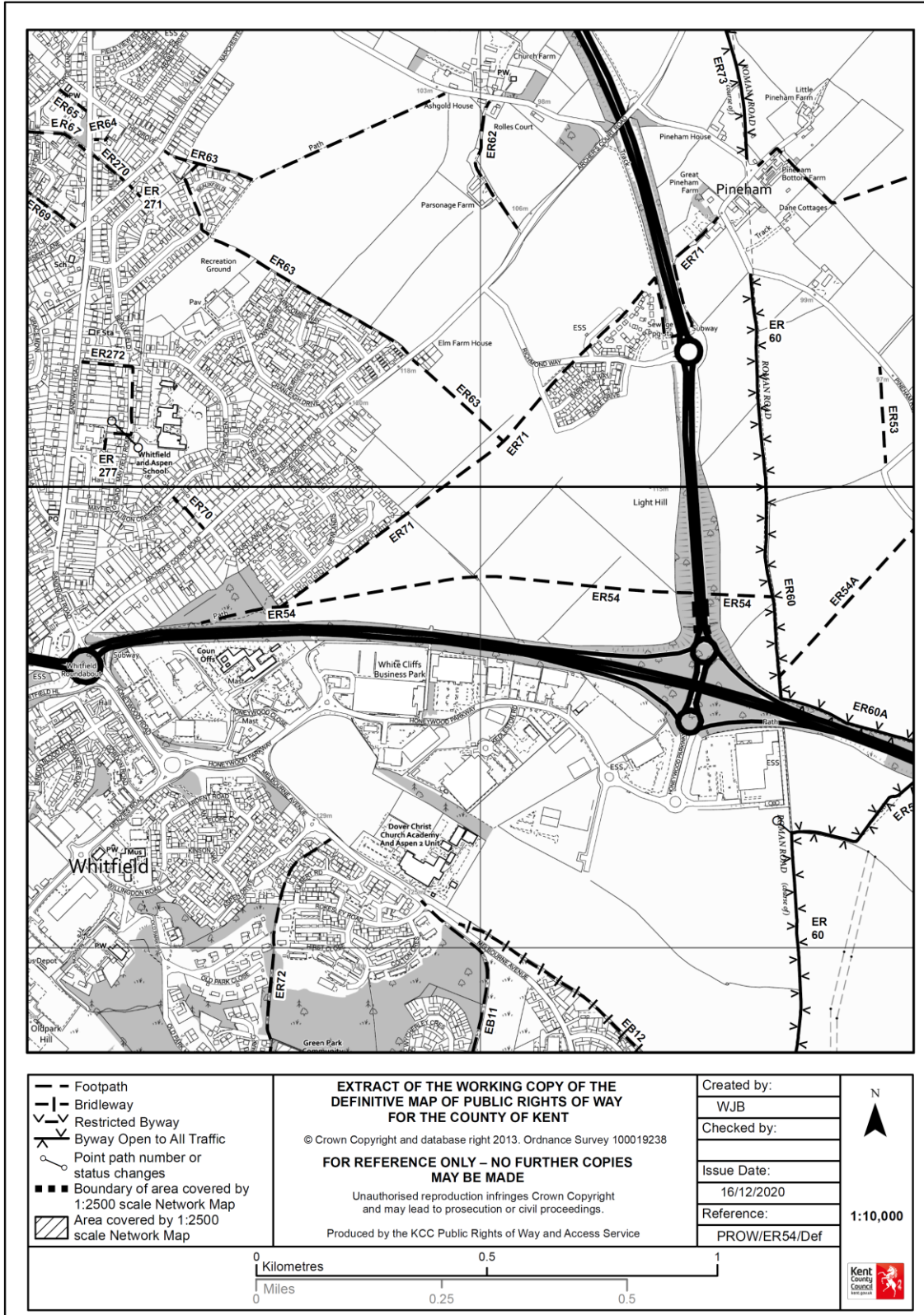
Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent - DOV/20/01048 (KCC/DO/0178/2020)

General Location Plan – Sections 1 and 2



Item D1 Appendix 1 Application Plans
Creation of two new sections of road as dedicated Bus Rapid
Transit route for buses, cyclists and pedestrians only - Land to the
north of Dover and to the south of Whitfield, Kent – DOV/20/01048
(KCC/DO/0178/2020)

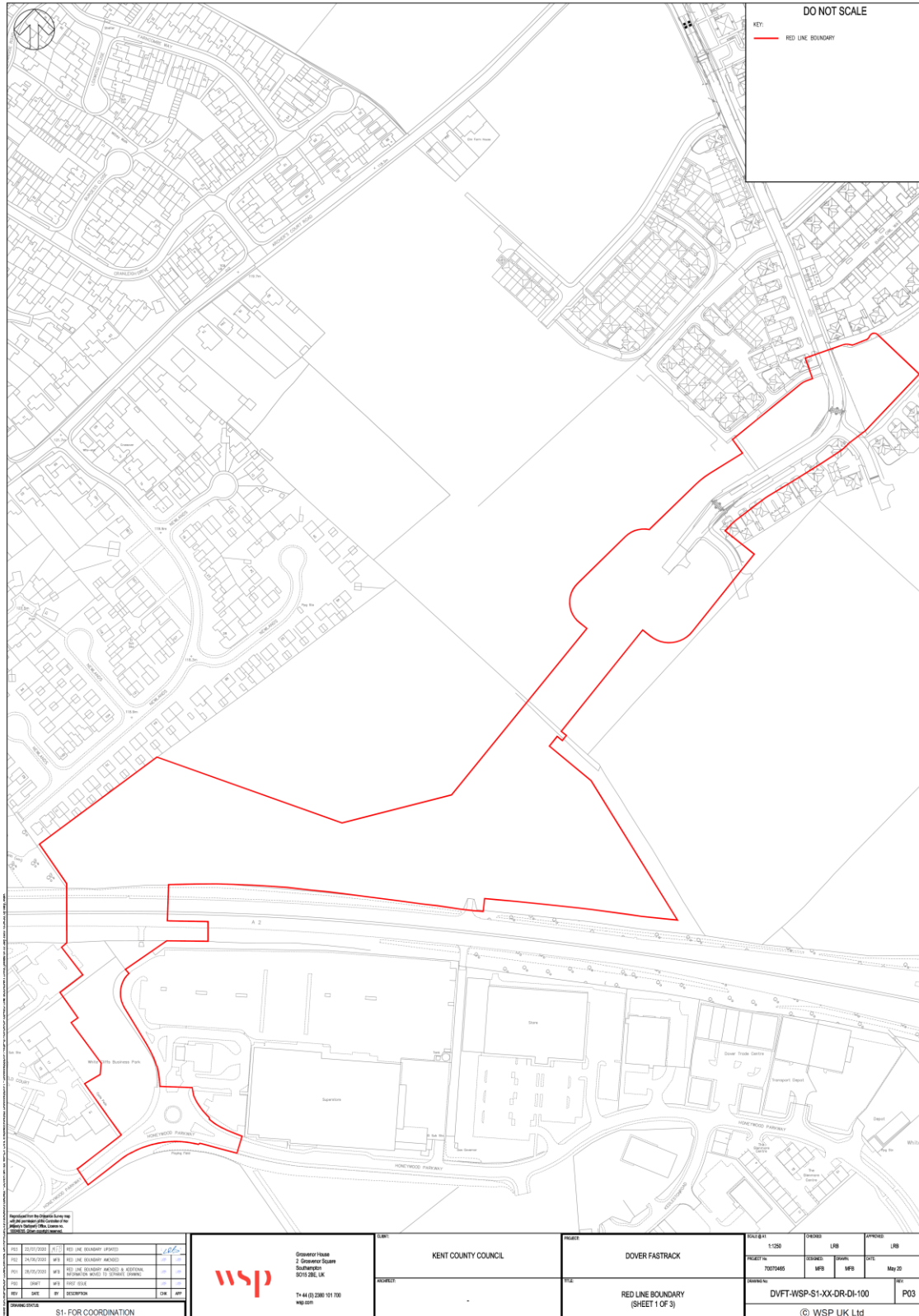
Definitive Map of Public Rights of Way



Item D1 Appendix 1 Application Plans

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

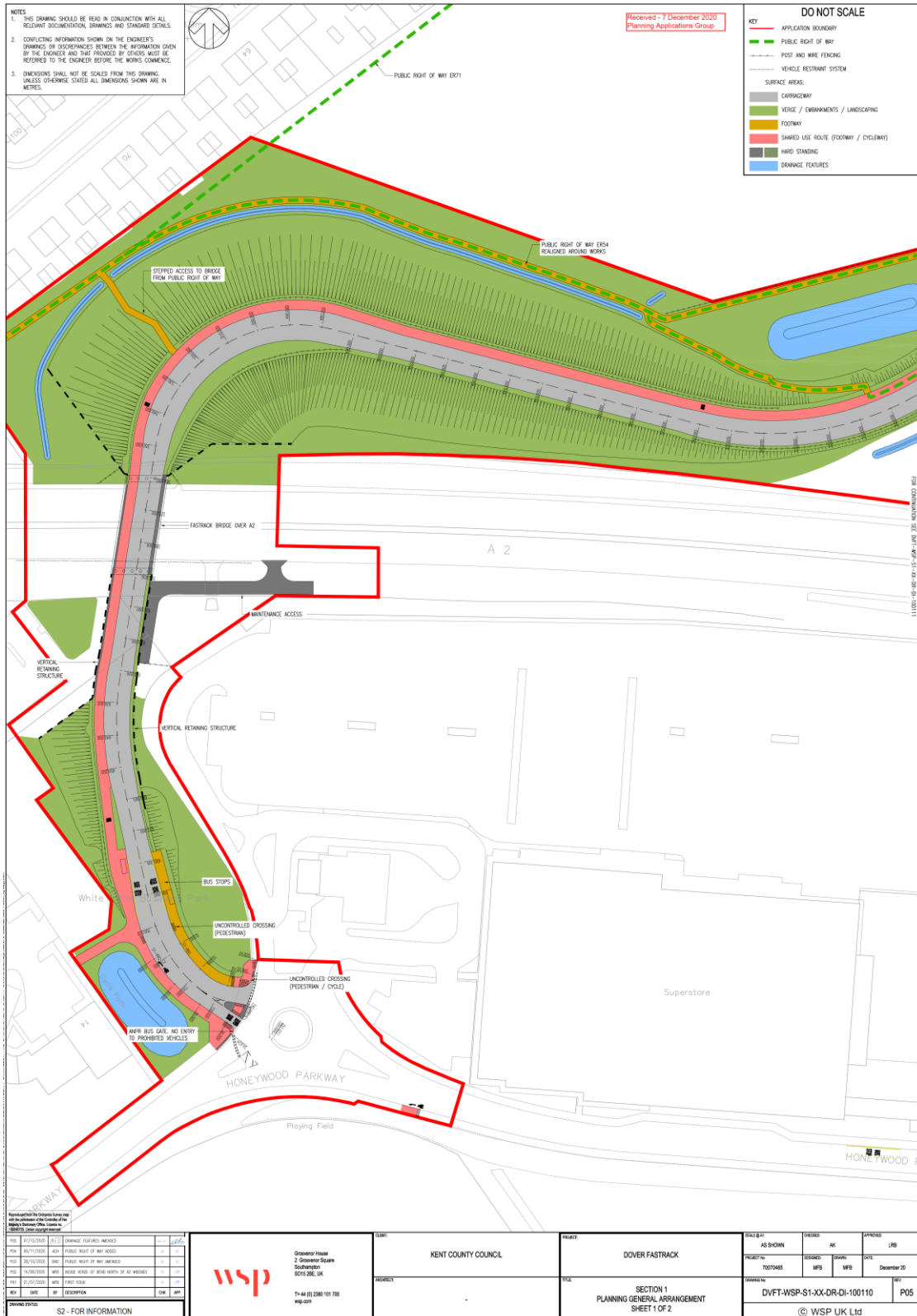
Red Line Boundary Section 1



Item D1 Appendix 1 Application Plans

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

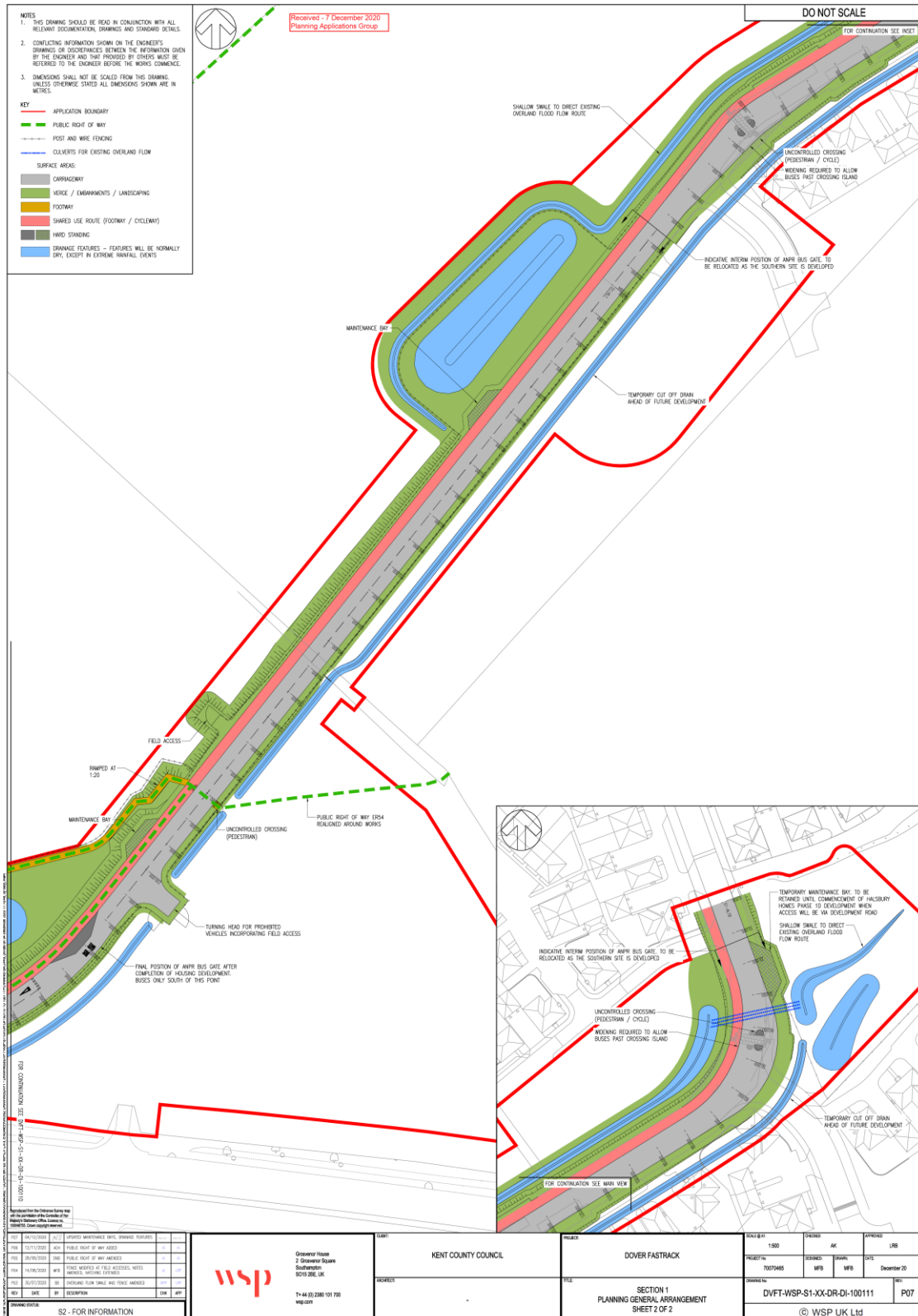
Section 1 – General Arrangement (plan 1 of 2)



Item D1 Appendix 1 Application Plans

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

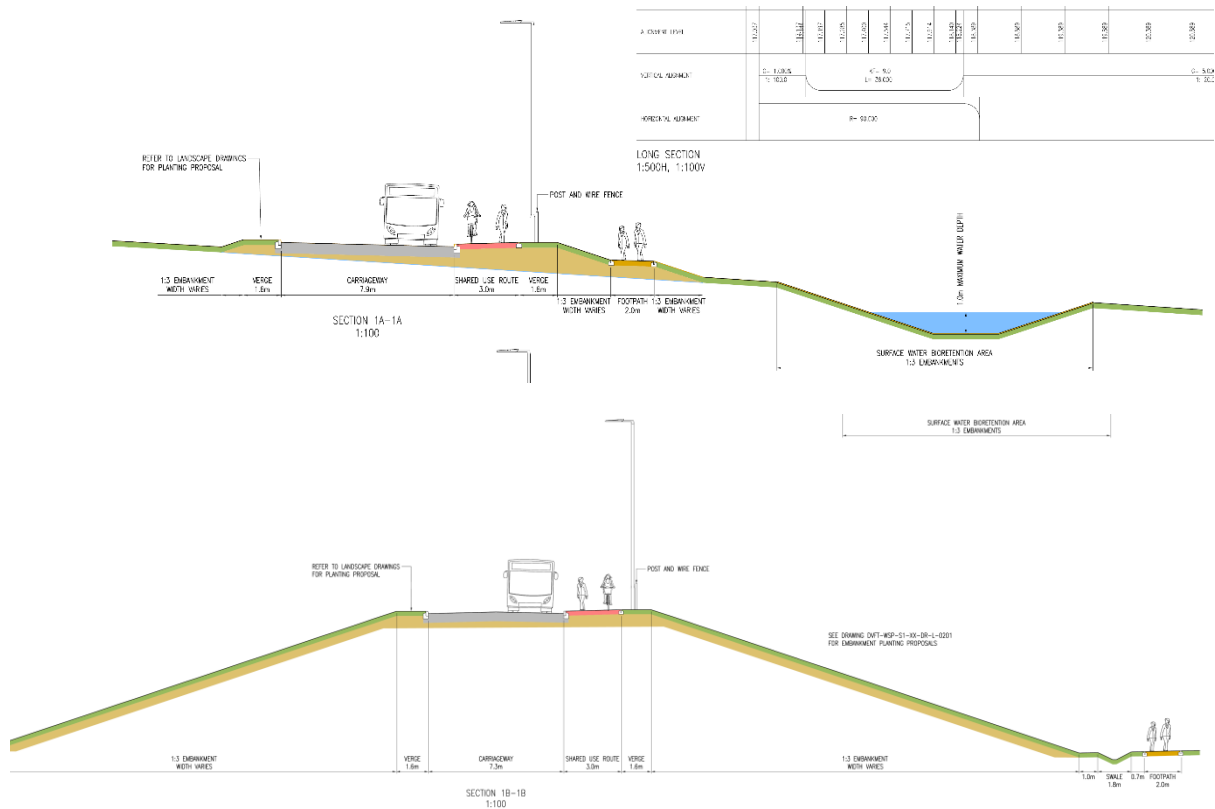
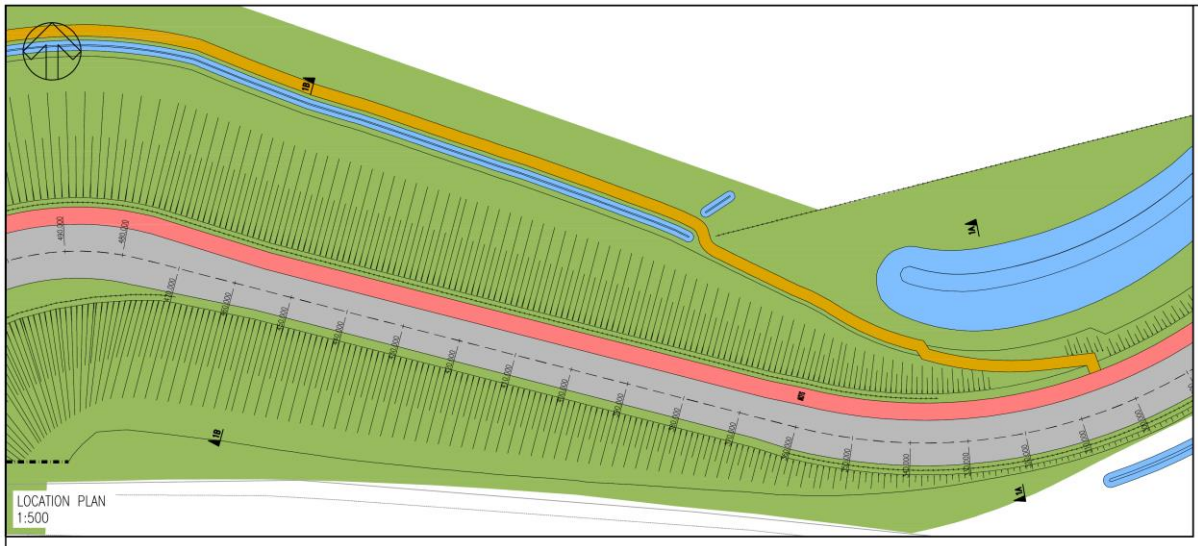
Section 1 – General Arrangement (plan 2 of 2)



Item D1 Appendix 1 Application Plans

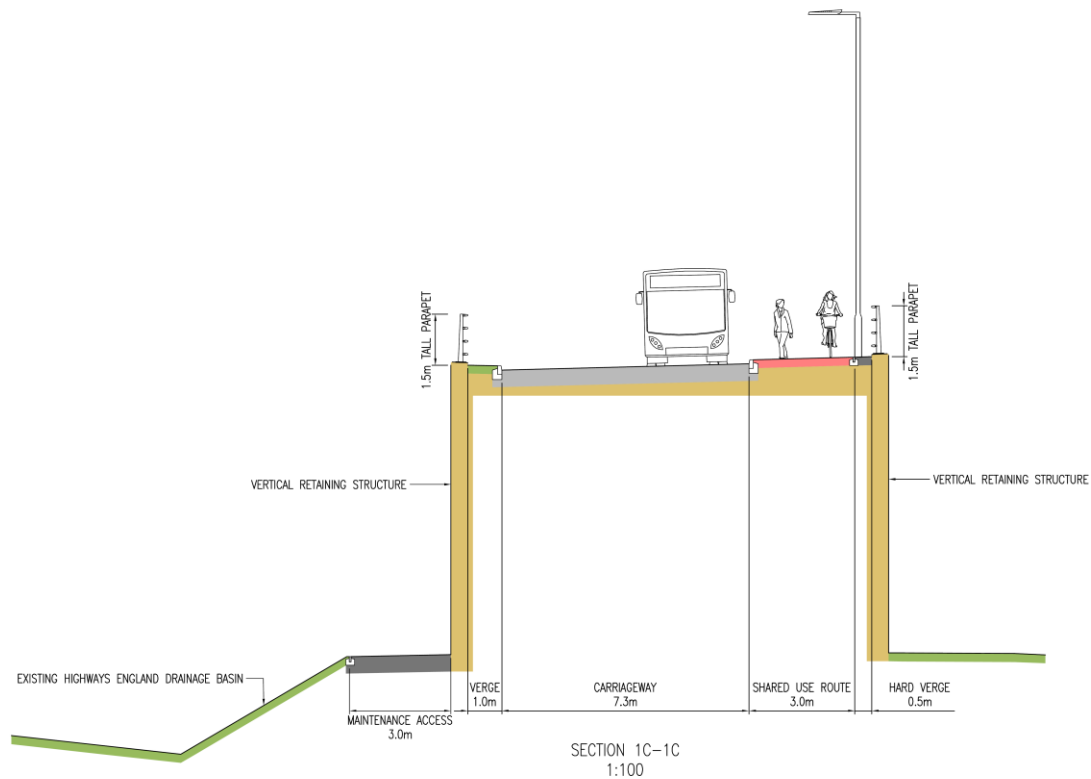
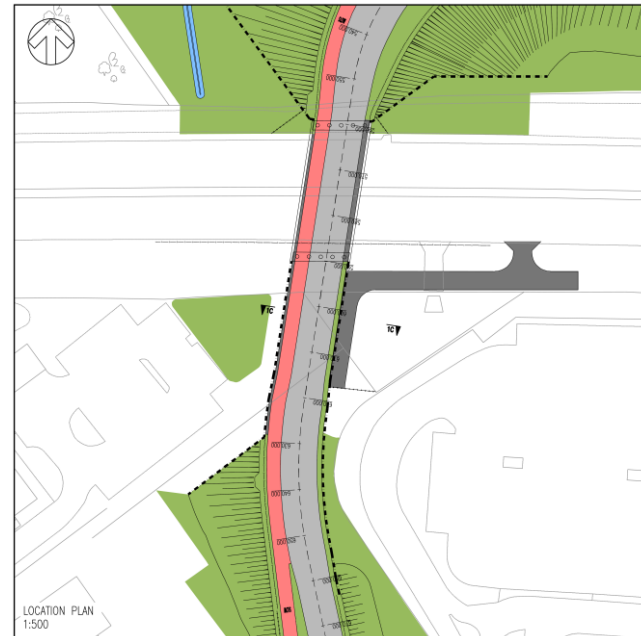
Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

Section 1 - Cross Sections



**Item D1 Appendix 1 Application Plans
Creation of two new sections of road as dedicated Bus Rapid
Transit route for buses, cyclists and pedestrians only - Land to the
north of Dover and to the south of Whitfield, Kent – DOV/20/01048
(KCC/DO/0178/2020)**

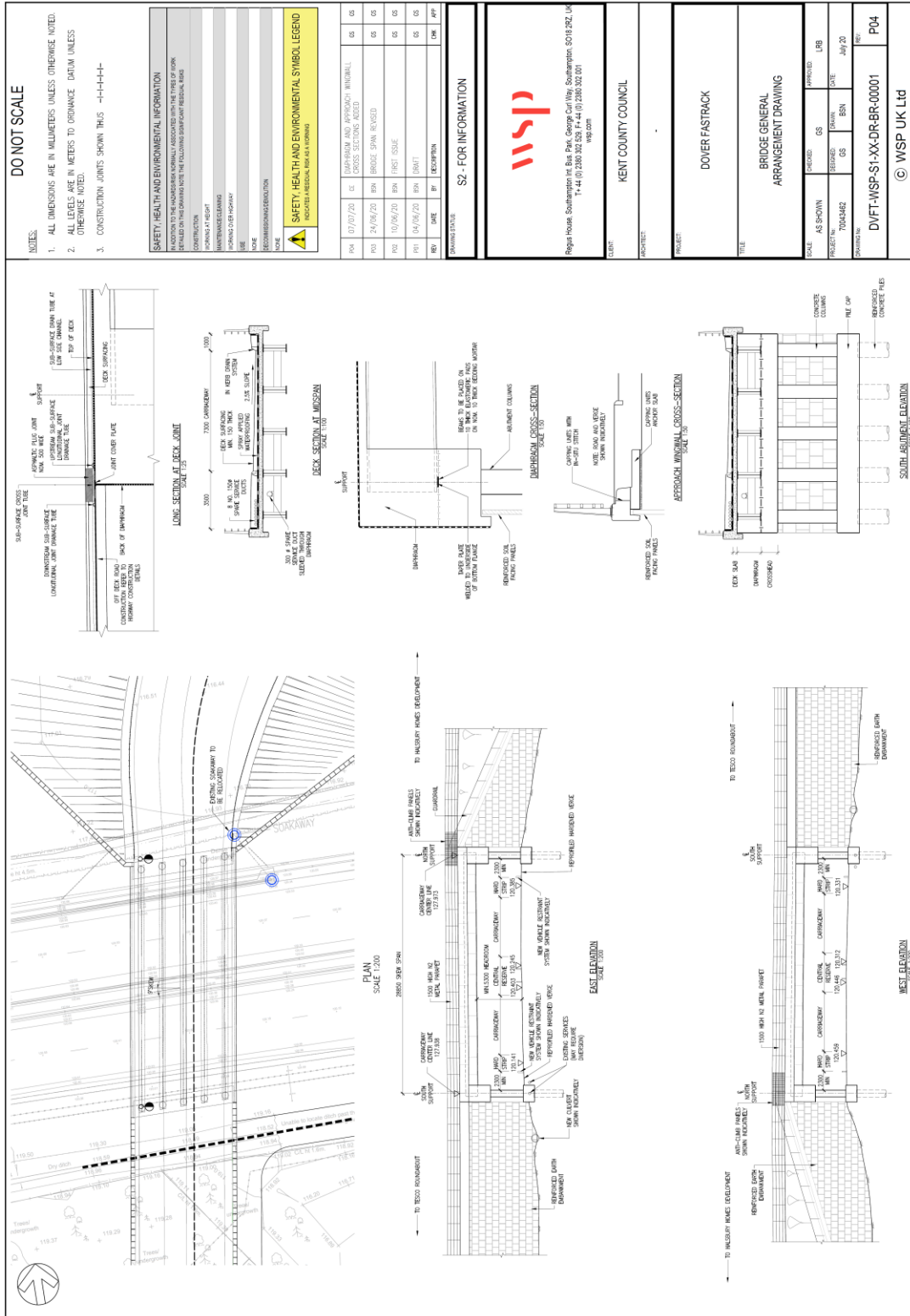
Section 1 – Bridge Cross Section



Item D1 Appendix 1 Application Plans

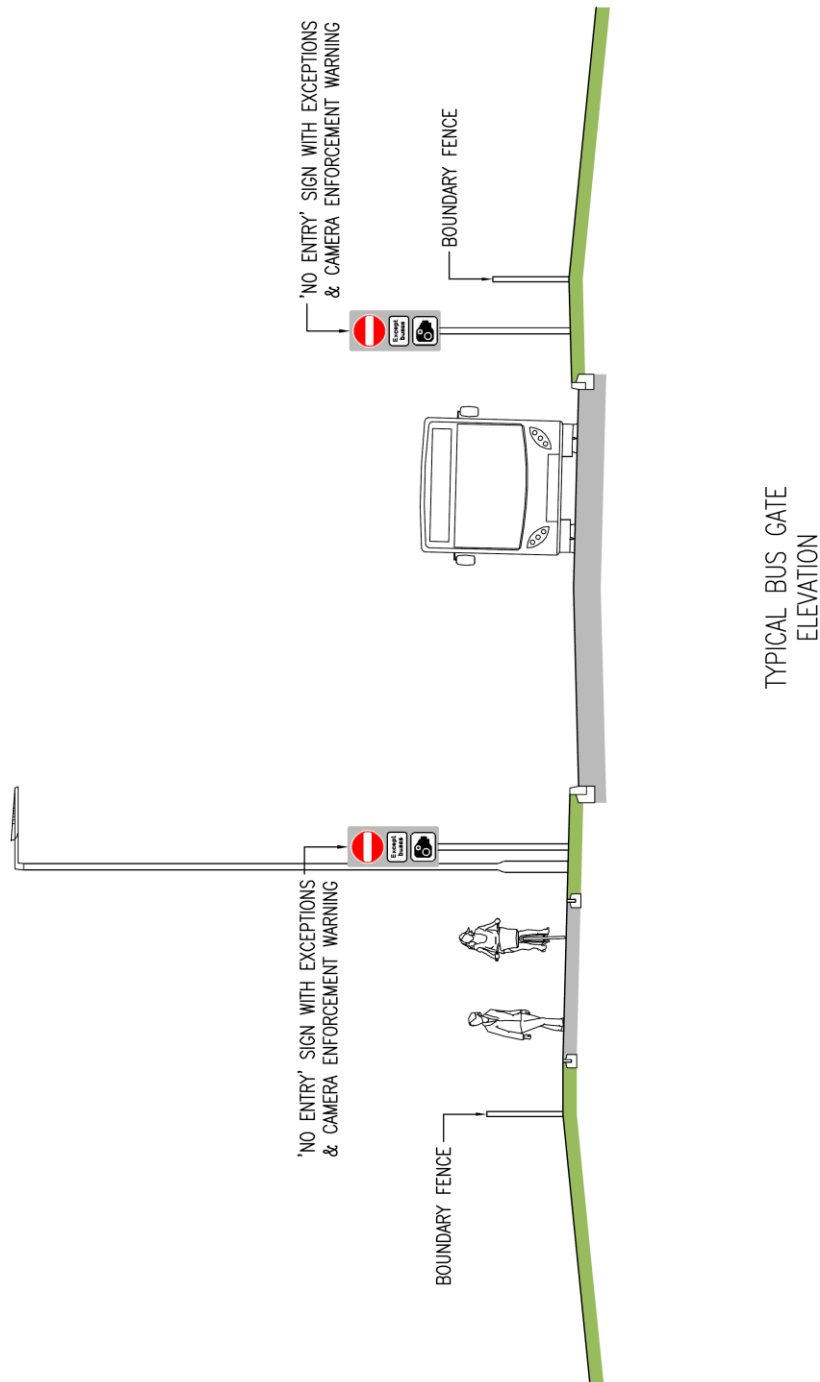
Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent - DOV/20/01048 (KCC/DO/0178/2020)

Bridge General Arrangement Drawing



**Item D1 Appendix 1 Application Plans
Creation of two new sections of road as dedicated Bus Rapid
Transit route for buses, cyclists and pedestrians only - Land to the
north of Dover and to the south of Whitfield, Kent – DOV/20/01048
(KCC/DO/0178/2020)**

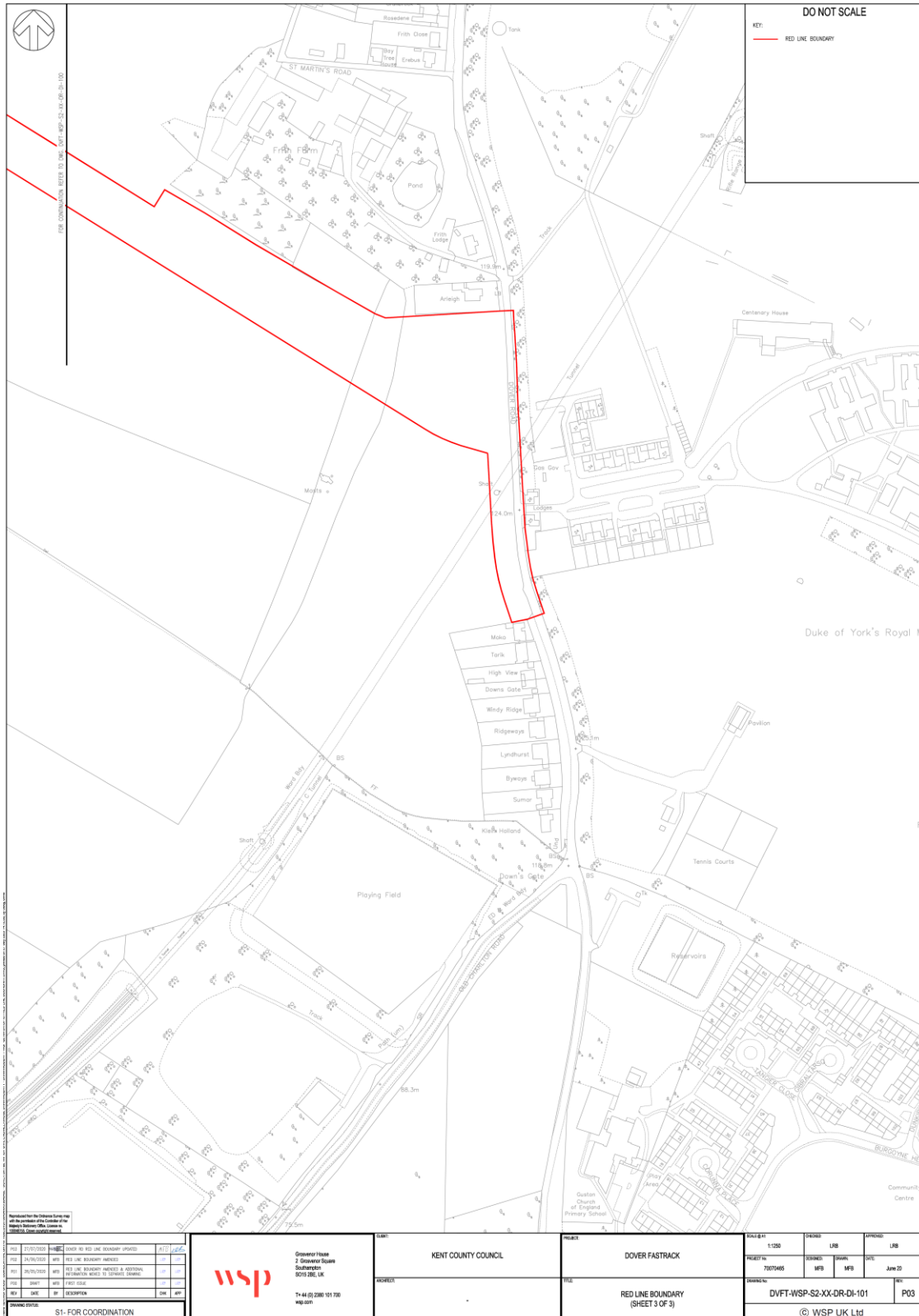
Typical Bus Gate Elevation



Item D1 Appendix 1 Application Plans

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

Red Line Boundary Section 2 (plan 2 of 2)



NO	DATE	BY	DESCRIPTION	STATUS
001	20/07/2020	WSP	ISSUED FOR RED LINE BOUNDARY STUDY	FOR INFO
002	24/07/2020	WSP	RED LINE BOUNDARY MARKED	FOR INFO
003	26/07/2020	WSP	RED LINE BOUNDARY MARKED & APPROVAL REQUESTED TO KENT COUNTY COUNCIL	FOR INFO
004	28/07/2020	WSP	FOR INFO	FOR INFO
005	30/07/2020	WSP	FOR INFO	FOR INFO

wsp

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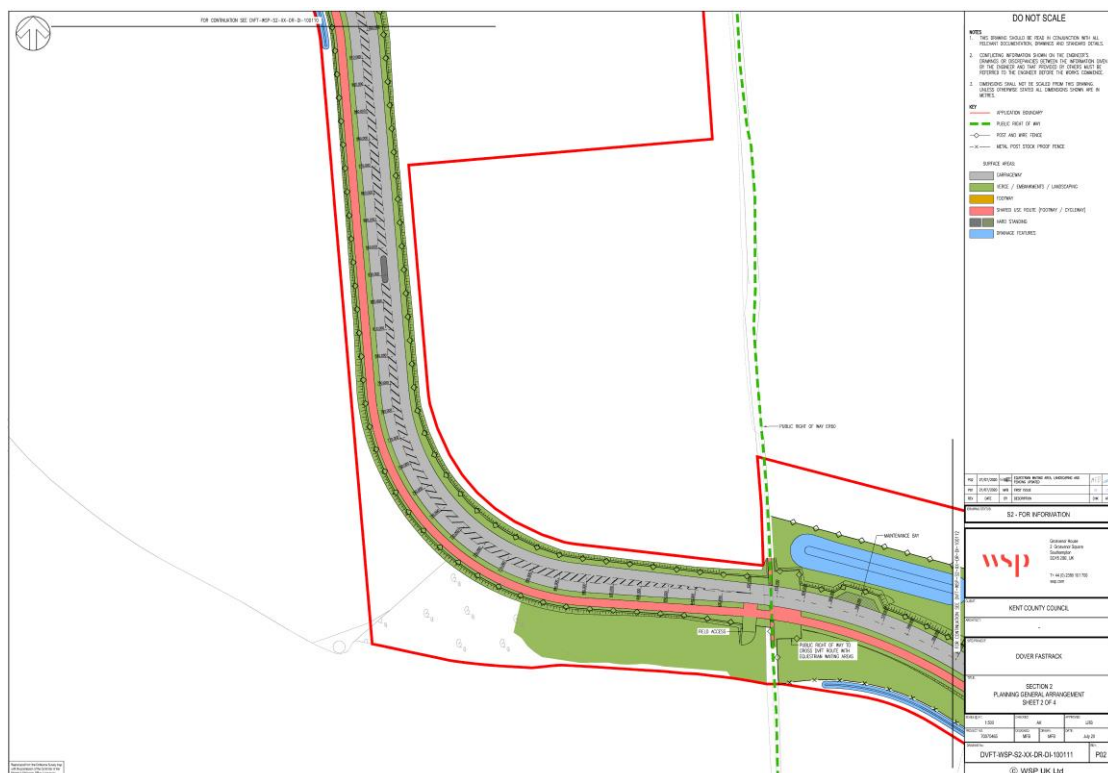
CLIENT	KENT COUNTY COUNCIL
PROJECT	DOVER FASTRACK
FILE	RED LINE BOUNDARY (SHEET 3 OF 3)

DATE: 01/11/20	DRAWN: LFB	CHECKED: LFB
PROJECT NO: 7007485	ISSUED: MFS	DATE: June 20
DRAWING NO: DVFT-WSP-S2-XX-DR-DI-101	P03	
© WSP UK Ltd		

Item D1 Appendix 1 Application Plans

Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

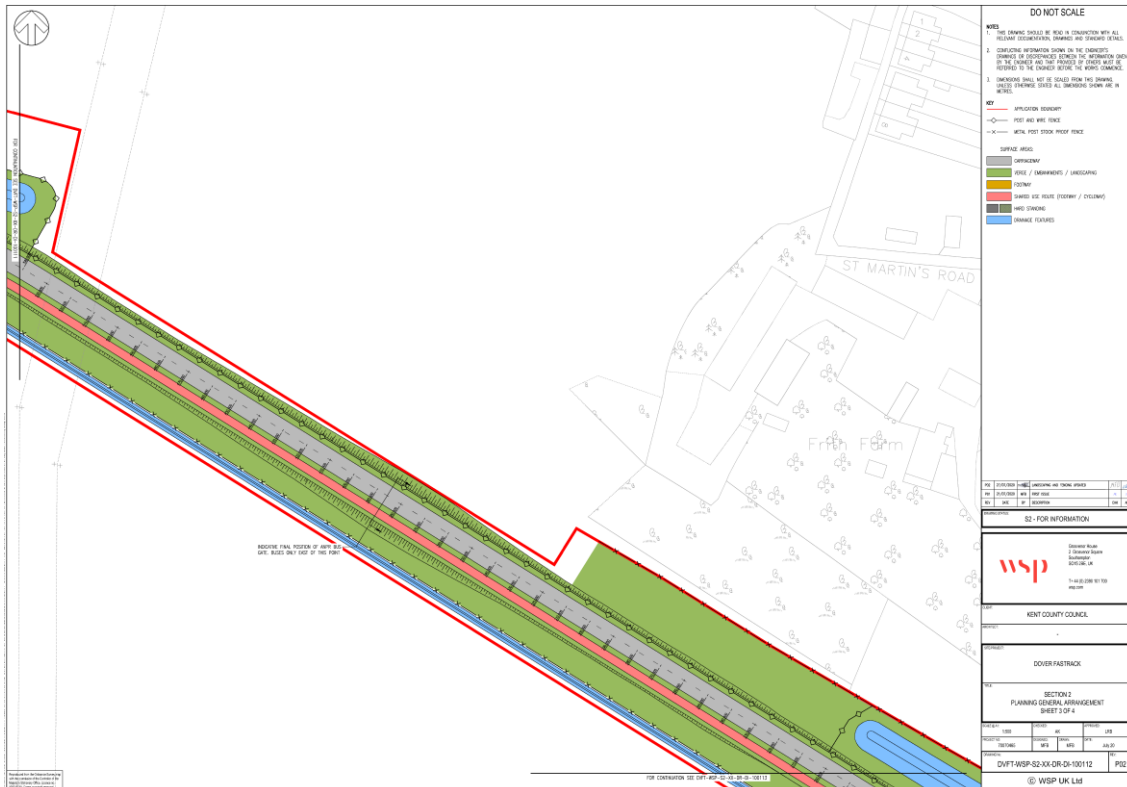
Section 2 - General Arrangement (plans 1 and 2 of 4)



Item D1 Appendix 1 Application Plans

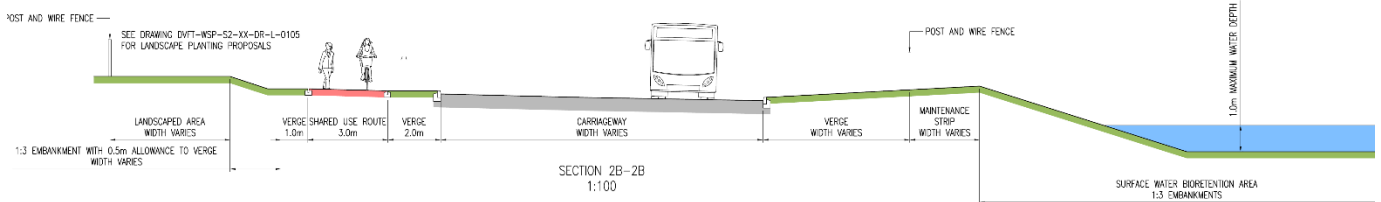
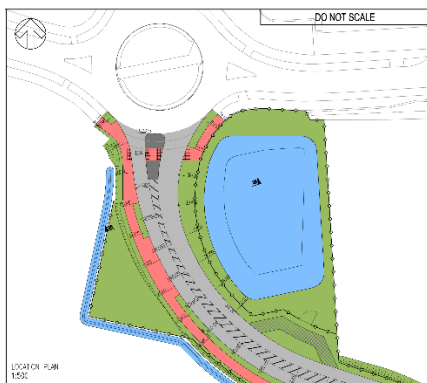
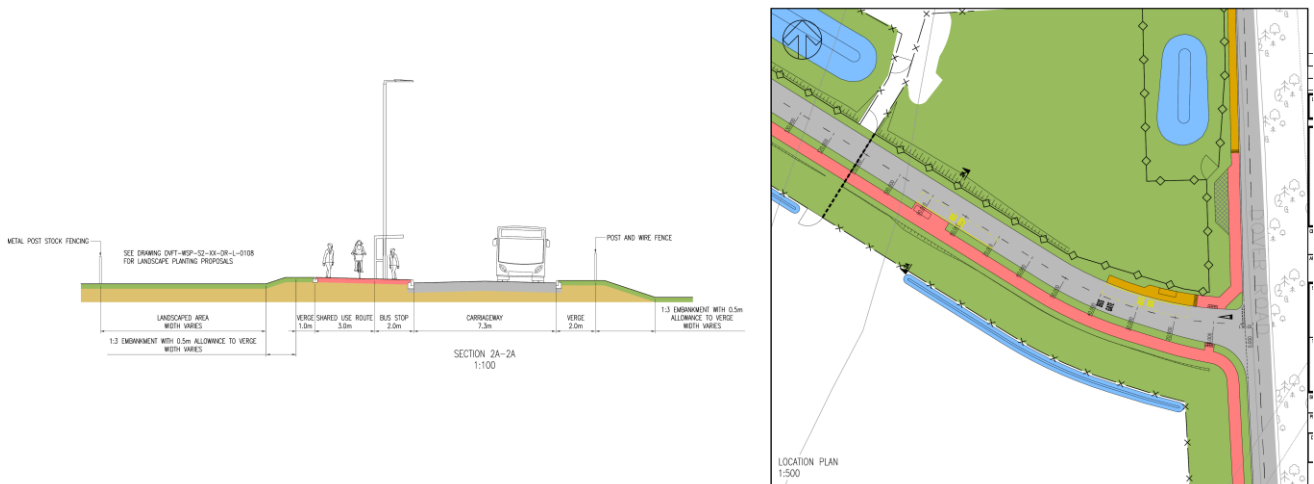
Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

Section 2 - General Arrangement (plans 3 and 4 of 4)



**Item D1 Appendix 1 Application Plans
 Creation of two new sections of road as dedicated Bus Rapid
 Transit route for buses, cyclists and pedestrians only - Land to the
 north of Dover and to the south of Whitfield, Kent – DOV/20/01048
 (KCC/DO/0178/2020)**

Section 2 – Cross Section



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Item D1 Appendix 2 Planning History
Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

Application Number and Address	Description	Decision
20/00718 Phase 1D Whitfield Urban Extension Whitfield	Reserved matters application for 221 dwellings pursuant to outline permission DOV/10/01010, relating to the appearance, landscaping, layout and scale	Pending
20/00640 Whitfield Urban Extension Phase 1C Archers Court Road Whitfield Kent	Reserved matters application pursuant to DOV/10/01010 - relating to layout, scale, landscaping, internal access arrangements and appearance for 236 dwellings (Phase 1c)	Pending
19/00964 Land Adjacent to Lidl East Of Honeywood Parkway White Cliffs Business Park Whitfield	The erection of a building for use as a gym (Class D2), a drive-thru restaurant/coffee shop (Class A1/A3/A5) and 2no. units for Class B2 and/or B8 use (with ancillary trade counter(s)) and sui-generis uses, together with the creation of a new access, parking arrangements, outside storage and servicing areas and associated works.	Approved 20th Jan 2020
18/01238 Whitfield Urban Expansion Phase 1C Whitfield CT16 3HX	Reserved matters application for the approval of part of Phase 1C, for 248 residential units, substation, appearance, landscaping, layout and scale in pursuant to outline application DOV/10/01010 for the development of 1,400 units, 66 bed care home and supported living units, vehicular access off the A256, primary school, energy centre and local centre with 250sqm of retail space (Class A1-A3) along with all associated access and car parking.	Approved 2nd April 2020
18/00429 1 Palmerston Road White Cliffs Business Park Whitfield CT16 3NF	Construction of hardstanding for parking of HGV vehicles and trailers and the installation of 3no. lighting columns	Pending
17/01525 Phase 1 Whitfield Urban Expansion Whitfield CT16 3HX	Reserved matters application for the appearance, landscaping, layout and scale (part of Phase 1B) for 32 dwellings pursuant to outline permission DOV/10/01010	Approved 24th April 2018
17/00917 Perrys Vauxhall Honeywood Parkway White Cliffs Business Park Whitfield CT16 3PT	Erection of a two-storey building, incorporating showroom, MOT bay, workshop and offices, vehicle turntable, parking, erection of fencing, barriers, bollards, cycle shed and landscaping	Approved 8th Dec 2017
16/01314 Plots 1-5 Phase 1A Archers Court Road Whitfield	Reserved Matters application pursuant to outline permission DOV/10/1010, relating to appearance, layout and landscaping of 94 dwellings together with garages and parking including all highway related details, sub phase 1a, Phase 1 (Light Hill) Whitfield Urban Expansion (Revision to Reserved Matters submission DOV/15/00878 in respect of reduction of previously approved Plots 1-9 (9 semi-detached dwellings) to 5 detached dwellings - Revised total of 90 dwellings for sub-phase1a).	Approved 25th Jan 2017
16/00976 Land at Honeywood Parkway White Cliffs Business Park Dover CT16 3FH	Erection of detached retail store (2,760sqm gross internal floor space, including mezzanine), together with provision of 159 car parking spaces and associated landscaping	Approved 20th Dec 2016

Item D1 Appendix 2 Planning History
Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

<p>15/00878 Phase 1 & 1A Whitfield Urban Expansion (Land South East Of) Archers Court Road Whitfield</p>	<p>Reserved matters application pursuant to outline permission DOV/10/01010, relating to the appearance, layout and landscaping of 94no. dwellings together with garages and parking including all highway related details, sub phase 1A, Phase 1, (Light Hill) Whitfield Urban Expansion</p>	<p>Approved 12th Oct 2015</p>
<p>15/00815 Land at Honeywood Parkway White Cliffs Business Park Whitfield CT16 3FH</p>	<p>Erection of 7no. units for Class B2/B8 use (with ancillary trade counter(s)) and sui generis use(s) within the specified categories: ((i) Storage, distribution of sales of tiles, floor coverings, bathroom and kitchen furniture and fittings and other building materials; (ii) Machinery, tool and plant hire; (iii) Auto Centre for fitting and associated sale of tyres and car parts (including MOT); and (iv) Plumbers and Building Merchants), together with the erection of 1no. unit (Use Class A3/A5) and the creation of new access and parking</p>	<p>Approved 19th Nov 2015</p>
<p>14/00378 Land Off Honeywood Parkway White Cliffs Business Park Whitfield CT16 3PT</p>	<p>Erection of a detached building (Use Class A3/A5), associated drive-through lane, construction of vehicular access, with associated car parking and landscaping</p>	<p>Approved 25th June 2014</p>
<p>12/00631 Phase II Honeywood Parkway White Cliffs Business Park Whitfield</p>	<p>Section 73 application for the variation of condition 11 of planning permission DOV/05/00519: 'outline application for the construction of approximately 65,000 sq metres gross of employment development (Use Classes B1, B2 and B8) and a fully detailed application for a non-food DIY retail warehouse (approximately 5,734 metres retail floor space), garden centre and builder's yard with servicing, parking, access, landscaping and spine road and internal road' to allow the retail sales of pets, pet food and pet accessories in part of the warehouse</p>	<p>Approved 11th Oct 2013</p>
<p>10/01010 Phase 1 Whitfield Urban Expansion (Land South East of Archers Court Road) Whitfield CT16</p>	<p>Outline planning application for the construction of up to 1,400 units, comprising a mix of 2-5 bed units, 66 bed care home (Class C2) and supported living units, with vehicular access off the A256; provision of new 420 place 2FE Primary School including early years provision, energy centre and local centre comprising up to 250sqm of retail space (Class A1-A3) along with all associated access arrangements, car parking, infrastructure and landscaping, with all matters (except the means of access off the A256) reserved for future consideration.</p>	<p>Approved 30th April 2015</p>
<p>10/00155 Honeywood Parkway White Cliffs Business Park Whitfield</p>	<p>Erection of 3 (use class B2 and B8) industrial units approximately 15,280sqm including access, car and cycle parking, servicing and landscaping (details pursuant to DOV/05/00519)</p>	<p>Approved 28th July 2010</p>

Item D1 Appendix 2 Planning History
Creation of two new sections of road as dedicated Bus Rapid Transit route for buses, cyclists and pedestrians only - Land to the north of Dover and to the south of Whitfield, Kent – DOV/20/01048 (KCC/DO/0178/2020)

<p>05/00519 Phase II Honeywood Parkway White Cliffs Business Park Whitfield</p>	<p>Outline application for the construction of approximately 65,000 sq metres gross of employment development (Use Classes B1, B2 & B8) and a fully detailed application for a non-food DIY retail warehouse (approximately 5,734 square metres retail floor space), garden centre and builders yard with servicing, parking, access and landscaping and spine road and internal road</p>	<p>Approved 5th May 2006</p>
<p>14/00378 Land Off Honeywood Parkway White Cliffs Business Park Whitfield CT16 3PT</p>	<p>Erection of a detached building (Use Class A3/A5), associated drive-through lane, construction of vehicular access, with associated car parking and landscaping</p>	<p>Approved 25th June 2014</p>
<p>12/00631 Phase II Honeywood Parkway White Cliffs Business Park Whitfield</p>	<p>Section 73 application for the variation of condition 11 of planning permission DOV/05/00519: 'outline application for the construction of approximately 65,000 sq metres gross of employment development (Use Classes B1, B2 and B8) and a fully detailed application for a non-food DIY retail warehouse (approximately 5,734 metres retail floor space), garden centre and builder's yard with servicing, parking, access, landscaping and spine road and internal road' to allow the retail sales of pets, pet food and pet accessories in part of the warehouse</p>	<p>Approved 11th Oct 2013</p>
<p>10/01010 Phase 1 Whitfield Urban Expansion (Land South East of Archers Court Road) Whitfield CT16</p>	<p>Outline planning application for the construction of up to 1,400 units, comprising a mix of 2-5 bed units, 66 bed care home (Class C2) and supported living units, with vehicular access off the A256; provision of new 420 place 2FE Primary School including early years provision, energy centre and local centre comprising up to 250sqm of retail space (Class A1-A3) along with all associated access arrangements, car parking, infrastructure and landscaping, with all matters (except the means of access off the A256) reserved for future consideration.</p>	<p>Approved 30th April 2015</p>
<p>10/00155 Honeywood Parkway White Cliffs Business Park Whitfield</p>	<p>Erection of 3 (use class B2 and B8) industrial units approximately 15,280sqm including access, car and cycle parking, servicing and landscaping (details pursuant to DOV/05/00519)</p>	<p>Approved 28th July 2010</p>
<p>05/00519 Phase II Honeywood Parkway White Cliffs Business Park Whitfield</p>	<p>Outline application for the construction of approximately 65,000 sq metres gross of employment development (Use Classes B1, B2 & B8) and a fully detailed application for a non-food DIY retail warehouse (approximately 5,734 square metres retail floor space), garden centre and builders yard with servicing, parking, access and landscaping and spine road and internal road</p>	<p>Approved 5th May 2006</p>

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E1 COUNTY MATTER APPLICATIONS AND DETAILS PURSUANT PERMITTED/APPROVED/REFUSED UNDER DELEGATED POWERS - MEMBERS' INFORMATION

Since the last meeting of the Committee, the following matters have been determined by me under delegated powers:-

Background Documents - The deposited documents.

- SW/20/503817 Section 73 application to vary condition 1 of planning permission SW/19/504616 to extend the completion of extraction and restoration by 1 year.
Orchard Farm, School Lane, Iwade, Sittingbourne, Kent, ME9 8QH
Decision: Permitted
- SW/20/505208 Section 73 application to vary condition 10 and remove condition 11 of planning permission SW/16/500694 to allow the facility to accept Biomass Bottom Ash and allow waste to be received from sources other than the Allington EfW facility.
Norwood Farm Quarry and Landfill Site, Lower Road, Minster on Sea, Isle of Sheppey. Kent ME12 3AJ
Decision: Permitted
- TM/20/2248 Section 73 Application to vary conditions 2, 13 & 16 of planning permission TM/15/1636 to enable the quarry to be deepened from 65mAOD to 63mAOD.
Nepicar Sand Quarry, Maidstone Road, Wrotham Heath, Kent, TN15 7SR
Decision: Permitted

E2 COUNTY COUNCIL DEVELOPMENT APPLICATIONS AND DETAILS PURSUANT PERMITTED/APPROVED UNDER DELEGATED POWERS MEMBERS' INFORMATION

Since the last meeting of the Committee, the following matters have been determined by me under delegated powers:-

Background Documents – The deposited documents.

- CA/19/1513 Details of a Verification Report pursuant to Condition 23 of planning permission CA/19/1513 (partial discharge of condition only).
/R23 (part) Simon Langton Grammar School For Girls, Old Dover Road, Canterbury, Kent CT1 3EW
Decision: Approved

- DO/17/1057/R25A Details of a Travel Plan pursuant to Condition 25 of planning permission DO/17/1057 (as amended by DO/19/1486).
Land on the South East Side of Archers Court Road, Whitfield, Dover, Kent, CT16 3HU
Decision: Approved
- DO/17/1057/R12&30 Details of the patterned manifestation to the hall glazing (Condition 12) and details of a detailed landscape plan (Condition 30) pursuant to planning permission DO/17/1057 (as amended by KCC/DO/0245/2019 (DO/19/1486)).
Land on the South East side of Archers Court Road, Whitfield, Dover, Kent CT16 3HU
Decision: Approved
- FH/20/1630 Proposed access improvements including a drop off area, levelling changes and minor resurfacing.
Stelling Minnis C of E Primary School, Bossingham Road, Bossingham, Canterbury, Kent, CT4 6DU
Decision: Permitted
- GR/20/285/R Application for a non-material amendment to planning permission GR/20/285 to allow the bottom panes of the windows on the ground floor and first floor of the western elevation to be obscured glass only as originally permitted under planning permission GR/18/0510.
Mayfield Grammar School, Pelham Road, Gravesend, Kent DA11 0JE
Decision: Approved
- SW/20/505338 The construction of a single storey extension to the Reception Office & Group Teaching areas to create additional space, together with the repositioning of an existing access path.
Bapchild and Tonge Primary School, School Lane, Bapchild, Sittingbourne, Kent ME9 9NL
Decision: Approved
- TH/20/1273 Change of use of land to outdoor education and nature study and a de-stress space for pupils of Laleham Gap School and erection of 1.8 metre boundary fence to match existing boundary fence and a 3.7m high wooden shelter.
Land on the North Side of Stirling Way, Ramsgate, Kent CT12 6PB
Decision: Permitted
- TM/19/2964/R7 Details of a Reptile Capture Report for all phases of the development pursuant to Condition 7 of planning permission TM/19/2964.
Land North of Platinum Way, St Mary's Platt, Sevenoaks, Kent TN15 8JE
Decision: Approved
- TW/18/2129/R17 Details of external/security lighting pursuant to condition 17 of planning permission TW/18/2129.
St Gregory's Catholic School, Reynolds Lane, Tunbridge Wells, Kent, TN4 9XL
Decision: Approved

TW/20/3072

Provision of outside shelters to enable all-year-round teaching.
Langton Green Primary School, Lampington Row, Langton Green,
Tunbridge Wells, Kent TN3 0JG
Decision: Permitted

E3 TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 – SCREENING OPINIONS ADOPTED UNDER DELEGATED POWERS

Background Documents –

- *The deposited documents.*
 - *Town and Country Planning (Environmental Impact Assessment) Regulations 2017.*
 - *The Government’s Online Planning Practice Guidance-Environmental Impact Assessment/Screening Schedule 2 Projects*
- (a) Since the last meeting of the Committee the following screening opinions have been adopted under delegated powers that the proposed development does not constitute EIA development and the development proposal does not need to be accompanied by an Environmental Statement:-
- KCC/SCR/SW/0220/2020 - Request for a Screening Opinion as to whether the proposed junction improvements would require an Environmental Impact Assessment
Key Street, Sittingbourne, Kent
- KCC/SCR/TM/0252/2020 - Request for a Screening Opinion to determine whether a proposed solar park requires an Environmental Impact Assessment.
Offham Landfill Site, Teston Road, Offham, West Malling, Kent, ME19 5PF
- KCC/TM/0259/2020 - Section 73 application to enable the operation of the established in vessel composting facility to its approved capacity for the same duration as the adjacent anaerobic digestion facility permitted under planning permission TM/19/2396 on 15 October 2020.
In Vessel Composting Facility, Blaise Farm Quarry, Kings Hill, West Malling, Kent ME19 4PN
- KCC/SCR/TW/0227/2020 - Request for a Screening Opinion as to whether the proposed upgrade works requires an Environmental Impact Assessment.
Hawkhurst South Wastewater Treatment Works, Stream Lane, Hawkhurst, Kent TN18 4RJ
- (b) Since the last meeting of the Committee the following screening opinions have been adopted under delegated powers that the proposed development does constitute EIA development and the development proposal does need to be accompanied by an Environmental Statement:-

None

E4 TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 – SCOPING OPINIONS ADOPTED UNDER DELEGATED POWERS

- (b) Since the last meeting of the Committee the following scoping opinions have been adopted under delegated powers.

Background Documents -

- *The deposited documents.*
- *Town and Country Planning (Environmental Impact Assessment) Regulations 2017.*
- *The Government's Online Planning Practice Guidance-Environmental Impact Assessment/Preparing an Environmental Statement*

None

SECTION F KCC RESPONSE TO CONSULTATION

Background Documents - the deposited documents; views and representations received as referred to in the reports and included in the development proposals dossier for each case; and other documents as might be additionally indicated.

KCC Response to Consultations

Reports to Planning Applications Committee on 13 January 2021.

These reports set out KCC's responses to consultations.

Recommendation: To note the reports

Unrestricted

1. Introduction and Supporting Documents.

The County Council has commented on the following planning matters. A copy of the response is set out in the papers. These planning matters are for the relevant District/Borough or City Council to determine.

F1 Proposal - Request for Scoping Opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017: Outline planning application for a residential- led development at Broadwater Farm, West Malling - TM/20/02249/EASP

County Council's response as Highway Authority to Tonbridge and Malling Borough Council on the above

F2 Proposal - Outline Application: Hybrid planning application for the following development: Outline planning permission (all matters reserved) for the erection of flexible B1c/B2/B8 use class buildings and associated access, servicing, parking, landscaping, drainage, remediation and earthworks; and, Full planning permission for erection of two warehouse buildings for flexible B1c/B2/B8 use class, realignment of Bellingham Way link road, creation of a north/south spine road, works to the embankment of Ditton Stream, demolition of existing gatehouse and associated servicing, parking, landscaping, drainage, infrastructure and earthworks - TM/20/01820/OAEA Location - Aylesford Newsprint Bellingham Way Larkfield Aylesford Kent ME20 7PW - TM/20/01820/OAEA

County Council's response as Highway Authority to Tonbridge and Malling Borough Council on the above

F3 Proposal - Hybrid application for outline permission for provision of up to 2000 residential units (including up to 100 Extra Care units), care home (Use

Class C2), two form entry primary school (Use Class F.1(a)), health facility (Use Class E(e)) and mixed use centre (Use Classes E(a-g), Sui Generis (drinking establishments and hot food takeaways)/C2/C3/F.1(a-g) and F.2 (ad), with vehicular access onto Dent de Lion Road, Garlinge High Street, Minster Road, Shottendane Road, Briary Close, Victoria Avenue, Belmont Road, and Brooke Avenue, along with new Primary Route Corridors between Shottendane Road and Minster Road and Shottendane Road and Dent De Lion Road, with all matters reserved, except access with; Full application for the erection of 120 residential units (within Class C3) forming Phase 1 including parking, access, landscaping, equipped play area, and other associated works - Land South Of Westgate And Garlinge, MARGATE, Kent TH/OL/TH/20/1400

County Council's response as Highway Authority to Thanet District Council on the above

F4 Otham Neighbourhood Plan Regulation 16

County Council's response to Maidstone Borough Council on the above

F5 Cranbrook and Sissinghurst Neighbourhood Plan Pre-submission - Regulation 14 Consultation

County Council's response to Parish Council on the above

F6 Benenden Parish Neighbourhood Development Plan 2020-2036 Regulation 16

County Council's response to Tunbridge Wells Borough Council on the above

F7 Lamberhurst Parish Neighbourhood Development Plan 2016-2036 Regulation 16

County Council's response to Tunbridge Wells Borough Council on the above

F8 Gravesham Local Plan - Emerging Local Plan Partial Review, Site Allocations and Development Management Policies– Regulation 18(2)

County Council's response to Gravesham Borough Council on the above

F9 Maidstone Local Plan – Regulation 18 (2) Local Plan Review Preferred Approaches Consultation December 2020

County Council's response to Maidstone Borough Council on the above

Background documents: As set out in the reports.



Tonbridge & Malling Borough Council
Development Control
Gibson Building
Gibson Drive
Kings Hill
West Malling, Kent
ME19 4LZ

Highways and Transportation
Ashford Highway Depot
4 Javelin Way
Ashford
TN24 8AD
Tel: 03000 418181
Date: 2 December 2020

Application - TM/20/02249/EASP

Location - Broadwater Farm Broadwater Road West Malling Ken

Proposal - Request for Scoping Opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017: Outline planning application for a residential-led development at Broadwater Farm, West Malling

Dear Robin

Thank you for consulting me on the Environmental Impact Scoping Report in respect of Broadwater Farm, West Malling.

KCC Highways has provided pre application advice to Berkeley Homes and their transport consultant WSP and it is agreed that a Transport Assessment and Travel Plan will be provided in order that the impact of this development can be assessed.

During the pre application process KCC Highways reviewed Scoping Notes and Technical Notes prepared by WSP and attended meetings. The Technical documents prepared by WSP are included in the appendices of the Environmental Scoping Report, however the responses from KCC Highways are not. KCC Highways' review of these documents contained detailed comments. There were several areas where concerns were raised not least the proposed single access to serve the site. I would request that the comments provided in the pre application meetings and correspondence by KCC Highways are addressed when preparing the Transport Assessment and Travel Plan

Yours sincerely

Louise Rowlands
Principal Transport & Development Planner

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Tonbridge & Malling Borough Council

Development Control
Gibson Building
Gibson Drive
Kings Hill
West Malling, Kent
ME19 4LZ

Highways and Transportation

Ashford Highway Depot
4 Javelin Way
Ashford
TN24 8AD

Tel: 03000 418181

Date: 17 December 2020

Application - TM/20/01820/OAEA

Location - Aylesford Newsprint Bellingham Way Larkfield Aylesford Kent ME20 7PW

Proposal - Outline Application: Hybrid planning application for the following development: Outline planning permission (all matters reserved) for the erection of flexible B1c/B2/B8 use class buildings and associated access, servicing, parking, landscaping, drainage, remediation and earthworks; and, Full planning permission for erection of two warehouse buildings for flexible B1c/B2/B8 use class, realignment of Bellingham Way link road, creation of a north/south spine road, works to the embankment of Ditton Stream, demolition of existing gatehouse and associated servicing, parking, landscaping, drainage, infrastructure and earthworks

Dear Robin

Thank you for providing the Transport Assessment Addendum (TAA) dated 2 December 2020 which has been prepared in response to my consultation response to Tonbridge and Malling Borough Council of 29 October 2020.

I have reviewed the TAA and my comments are as follows:

1 Accessibility

The applicant has agreed to provide financial contributions towards the cost of pedestrian/cycle improvements as follows:

Drawing 205236D-C-02 shows improved, widened footways along the eastern side of Papyrus Way and extending along the southern side of New Hythe Lane towards New Hythe Station. Improvements to pedestrian and cycle routes are welcomed please provide highway boundary drawings in order to show that these measures can be delivered within the highway. It appears that the section along Papyrus Way opposite Abbey Drive includes third party land.

A footway link along the east side of Leybourne Way from New Hythe Lane to tie in with the existing footway is shown on drawing number 205236D-C-03 and this is as requested.

A walking and cycling route to Aylesford rail station is shown on drawing number 205236D-C-04 and whilst this is supported in principle it is considered that the carriageway on Station Road should be a minimum width of 6.5m and therefore some highway verge could be used to increase the width of the footway/cycleway whilst maintaining a reasonable carriageway width. The widening of the footway should continue along the radius of the junction of Bellingham Way and continue into Bellingham Way with a tactile crossing provided to allow pedestrian and cyclists to link with the footway /cycleway proposed along the western side of Bellingham Way as shown on drawing number AYL-BWB-GEN-IF-SK-C-0102 Rev P04. Again, highway boundary detail is required.

A walking and cycle route along the Bellingham Way link road is included on drawing number AYL-BWB-GEN-IF-SK-C-0102 Rev P04. I am not sure whether there is a cycle route along the section of Bellingham Way between the site boundary and the junction with New Hythe Lane; if not please could this be provided in order that it links with the route on New Hythe Lane/Leybourne Way.

AYL-BWB-GEN-IF-SK-C-0101 Rev P03 shows the footway cycleway extending along the site access road and into College Road, however there is a narrow 2m section prior to the junction with Papyrus Way and this should be widened to 3m.

A financial contribution of £250,000 for the upgrade of the existing public footpath along the south side of the River Medway between Mill Hall and Aylesford village has been offered and this is welcome and accepted.

Enhancement to PRoW MR492 and MR493 are also agreed.

Since providing my previous comments I have been made aware of the footpath leading towards Bell Lane from Bellingham Way and this could provide a useful link between the residential area and this employment site for cyclists as well as pedestrians if it were widened. It would be particularly helpful if this could be sufficiently wide to accommodate vehicles wishing to access the water treatment site which currently have to take access from Bell Lane.

The increase in traffic along Papyrus Way and into New Hythe Lane is a concern for pedestrians wishing to cross New Hythe Lane to access the bus stop opposite the Brickmakers Arms and Leybourne Lakes. A pedestrian crossing facility is required.

Indiscriminate parking occurs along the footway on New Hythe Lane on the approach to the junction of Bellingham Way/Leybourne Way and this is likely to interfere with the free flow of traffic. A scheme to manage parking, providing formal on-street parking bays would improve traffic flow and reduce traffic speeds due to reduced carriageway width, whilst allowing parking to occur.

Additional incentives to encourage sustainable travel are as follows:

Bike hire scheme comprising 36 bikes over 6 bike stations with maintenance and running costs for 5 years.

Car club contribution of £50,000 to fund the provision of 1 car club vehicle at year 1 and 2 vehicles at years 2 and 3. All business provided with free car club membership for their employees and 1 years free personal membership to all employees.

Car Pooling contribution and provision of car share parking spaces.

Charging points for electric vehicles at 10% across the site and 100% passive provision.

Car Park Management Plan

Cycle parking is proposed for 230 cycles with a commitment to provide additional spaces should they be required. I would question how this will be monitored as this will require periodic surveys which should be completed at the applicant's expense. Please provide details of how this will work in practice.

A contribution towards bus service enhancements is proposed based on an extension of a local bus service connecting the site with Maidstone on a half hourly frequency at a cost of £664,460. I await comments from KCC Public Transport Team.

The commitment to provide these contributions is welcomed and whilst S106 contributions are appropriate for the PRow improvements, the bus contribution and the sustainable travel initiatives, the works within the highway should be completed via S278 Agreement. This would include footways/cycleways and bus stop improvements.

2 Vehicular Access Strategy

Drawings of the Bellingham Way Link road have been updated to take into account the comments raised in the previous response by KCC Highways. I can confirm that a design in accordance with the Kent Design Guide, Local Distributor Road is acceptable. A safety audit is provided at Appendix B of the TAA and designers comments are included. The comments can be addressed in the detailed design. I note that comment has been made regarding the straight alignment of the access road and that this could lead to speeding and therefore additional speed restraint features are needed at 60m distances.

Swept path drawings are provided at Appendix C of the TAA. Drawing AYL-BWB-GEN-IF-SK-C-0111 Rev P01 shows tracking for HGVs and access to units are designed to reduce HGVs movements travelling to and from the direction of Papyrus Way, however there is nothing to prevent HGVs turning right into units 3 and 4 or turning right out of unit 1. Physical restrictions are needed to prevent these manoeuvres such as central islands on the access road.

Access to unit 3 is too tight, the tracking diagrams show HGVs in conflict. The site is shown to cater for a significant number of HGVs and so additional space should be provided.

A third-party TRO is required in order for the applicant to pursue a weight limit and also parking controls in the HGV turning area.

A signing strategy should also be a condition of any planning consent.

3 Parking

It is agreed that an appropriate condition can be provided to review the parking provision should units 6 and 7 be used for B1 or B2 use and not B8 use subject to LPA approval.

Measures can be included in the travel plan to encourage car sharing and reduce single occupancy car trips.

Safe secure cycle parking is required for units 6 and 7 close to the building entrance. This isn't shown on the layout plan. The level of cycle spaces proposed is significantly less than that recommended in SPG4. The applicant indicates a commitment to increase cycle parking if

needed and so details of how this will be identified, where it will be provided and how it will be funded are needed and this can be included in the travel plan.

4 Crashes

Additional information is provided and no particular problems are identified.

5 Trip Rates

An explanation of the methodology used to calculate the modal trip generation for staff trips has been provided and the use of census travel to work data is agreed.

6 Traffic distribution

Vehicle distribution diagrams for various scenarios have been included in Appendix E for both AM and PM peaks and Appendix F provides the methodology undertaken to estimate the distribution of trips associated with the extant use of the Aylesford Newsprint site and the distribution of the development trips on the new link road. Census data has been used to understand the usual residency of those who work within Tonbridge & Malling using the Middle Layer Super Output Area (MSOA) where the site is located.

The approach taken to determine the make-up of trip origins is accepted and it highlights that most workers will travel from Maidstone and Medway to the Aylesford Newsprint development site. Figure 1 within the TA Addendum Appendix F indicates the predicted distribution routes. Tables 3 and 4 further explains the total breakdown of trip percentage, this feeds into explaining how trips will disperse from the site to the various eight routes shown in Figure 1. Kent CC agree in principle with the approach taken for car trips however HGV trips will be routed to Leybourne Way and it isn't clear if has been accounted for. Please include HGV numbers on the distribution diagrams. It should be noted that staff at the former Aylesford Newsprint site were able to access the site from both ends of Bellingham Way through a barrier system. This should be accounted for in the distribution the extant use staff trips.

I would be grateful if some clarification could be provided regarding the distribution diagrams at Appendix E as the Do Minimum 2031 doesn't tally with the flows in the A20 Visum Junction Assessments report March 2019 and there seem to be discrepancies in the flows – for instance 386 vehicles are shown to be exiting Bellingham Way to Station Road in the AM peak when this link is closed to traffic.

The TAA states that the current application is expected to generate less traffic than that predicted in the Visum modelling for the Local Plan – please provide evidence of this.

7 Growth

Junctions have been assessed for the 2031 future year and so the concern previously raised is adequately addressed.

8 Impact

The development is expected to generate 742 in the AM and 854 in the PM peak. Taking into account the trips that could be generated by the extant use of the site the residual traffic generation is 543 vehicle trips in the AM peak and 593 in the PM peak. This is a significant amount of traffic to accommodate on an already constrained highway network and this is why an assessment of a wide study area has been requested.

The TAA includes further analysis of the net impact of traffic at additional junctions as requested and including:

Jn 1 Bellingham Way/New Hythe Lane/Leybourne Way

Modelling indicates that the junction is within capacity in the Do Something 2031 scenario

Appendix H provides a safety review of the New Hythe Lane roundabout as shown on drawing 205236D-A-06. The review has considered the geometry of the roundabout and the crash data for the 5-year period and states that there are departures from design standards on the geometry of the roundabout and concludes that these are existing and do not appear to have formed a detriment to highway safety at this location. However, it would seem that the audit team have not taken into account the very significant increase in traffic flows generated by this planning application which will gain access to the wider highway network through this junction. It is the view of the Highway Authority that the deficiencies in design combined with the increase in traffic will lead to safety issues and it is recommended that appropriate mitigation is provided.

Jn2 Papyrus Way/New Hythe Lane

The junction has been remodelled using a one-hour profile and including growth to 2031. No capacity issues have been identified.

Jn 4 Leybourne Way/Tesco access

The junction is expected to see a small increase in traffic flows during the AM peak (48) and a significant reduction in the PM peak (-343). A capacity assessment has been completed and the junction has sufficient capacity to accommodate the additional vehicles in the AM peak period.

Jn 8 A20/Malling Road/Hays Road no significant impact

Jn 9 A228/Peters Bridge is expected to see a significant reduction in traffic flows in both peak periods and therefore a capacity assessment is not required.

Jn 12 A20/Ashton Way/Castle Way

This junction is expected to see a net reduction in traffic in the AM peak and a small increase in the PM peak (23 vehicles) This increase is not considered significant for a junction of this size and therefore additional modelling is not required.

Jn 13 Leybourne Way/Lunsford Lane Table 9 Appendix G shows a significant net reduction in traffic flow at the junction so additional modelling is not required.

Jn 14 A20/New Road

Although there is expected to be an increase in traffic of 60 vehicles in the PM peak this junction is subject to improvement via S278 works associated with the Parkside development proposal at East Malling. The junction improvement was modelled with the Aylesford Newsprint development included.

Jn 17 A20/Mills Road/Hall Road

Junction improvement schemes are programmed to commence summer 2021 with completion expected approximately 12 months later. The junction improvement has been modelled to include traffic generated from the redevelopment of the Aylesford Newsprint development. The redevelopment of Aylesford Newsprint is expected to generate an additional 50 traffic movements in the AM peak and 54 in the PM peak at this junction. A condition to restrict development prior to the completion of the works is not required as the opening of the

Bellingham Way link will allow improved highway resilience and this will outweigh the disbenefit of the additional traffic movements.

Jn 18 A20 Coldharbour Roundabout

The development is expected to generate an additional 28 traffic movements in the AM peak and 52 in the PM peak. Work on the improvement scheme is expected to start spring 2021. The improvements have been modelled to include the Aylesford Newsprint development. A condition to restrict development prior to the completion of the works is not required as the opening of the Bellingham Way link will allow improved highway resilience and this will outweigh the disbenefit of the additional traffic movements.

Jn 19 A20/ St Laurence Avenue

The increase in traffic arising from the development is minimal; 4 traffic movements in the AM peak and 12 in the PM peak.

Jn 20 Station Road/ Hall Road the capacity assessment indicates the junction operates within capacity in the Do Something 2031 scenario. Please can the modelling for this junction be checked as the Do Minimum results provided in the TA which include the extant use of the Newsprint site show significant reserve capacity however the A20 Visum Junction Assessment Report of March 2019 shows negative capacity in 2031 Do Minimum scenario without extant use trips included.

Jn 21 Station road / Bellingham Way link has been modelled with the left turn in from Station road set to zero and the TAA states that this has been done as the left turn in gives way to the right turn in. I am not convinced that this is the case. The results of the capacity assessment show the junction to be over capacity in the AM peak and at capacity in the PM peak. There is also a safety concern with regards to this non-typical junction arrangement in the context of intensified use.

The TA provides reasons why the junction should not be improved to accommodate the additional traffic generated, however it is the view of the Highway Authority that the queues and delays arising from the increased traffic as a result of this application are excessive and will lead to severe congestion and highway safety issues. It is appreciated that an array of sustainable transport infrastructure and contributions are proposed and this is very welcome, however the site is being developed for a large employment site which will generate a significant amount of LGV movements which are not suited to sustainable modes of travel and therefore mitigation is considered necessary.

Jn 22 Forstal Road/High Street, Aylesford

The application is expected to reduce traffic through the junction by 140 vehicles in the AM peak and increase by 59 in the PM peak.

Jn 23 A229/Forstal Road/Sandling Lane – Running Horse Roundabout

The capacity assessment for the Running Horse roundabout shows the A229 (N) arm to be over capacity in the 2031 base + committed development scenario and this is worsened in the 'with development' scenario. The results show that the traffic generated by this application will double the queue and delay on this arm of the junction, although all other arms remain within capacity. It would therefore seem appropriate for mitigation to be provided either in the form of S278 works on this arm of the junction or via contributions to the Kent A229 Bluebell Hill improvement scheme.

A20/Hermitage Lane

The traffic generated at the junction of A20/Hermitage Lane is approximately 124 movements in the AM peak and 91 in the PM peak. The junction has not been included in the modelling and it

is recommended that the Whitepost Field link road should be completed prior to full occupation of the application site. The trigger should be based on traffic generation. Whilst the traffic volumes arising from the detailed element of this application can be accommodated prior to the link road being delivered, further work is needed to evidence the amount of additional traffic that can be generated through the junction without the link road in place.

JN 27 Level crossing

The level crossing already causes queues in each direction along Station Road. It is clear that the additional traffic generated by this application will worsen this situation, however this cannot reasonably be mitigated by this application.

Site Access junctions

All site access junctions operate within capacity in the 2031 scenario.

9 Mitigation

The improvements to sustainable transport modes are welcome and will allow choice of travel options for employees travelling to and from work and local residents. The opening of the Bellingham Way link road will provide an alternative route to the A20 to the benefit of highway resilience. An employment site of this size will generate significant numbers of operational vehicle trips which unfortunately are not likely to switch to sustainable travel options. Impact assessments have been completed for a number of junctions and the results indicate that for the majority, the application will not have any detrimental impact on capacity or safety. However the evidence provided indicates that this application will have a significant detrimental impact on some key junctions, namely Station Road/Bellingham Way, Running Horse Roundabout and there are safety concerns relating to the roundabout junction of Bellingham Way/New Hythe Lane/Leybourne Way which are not addressed. Additionally, discrepancies in the 2031 base traffic flows need clarification.

10 Conclusions

The TAA has provided additional information which has clarified many points and addressed many concerns previously raised and this is greatly appreciated. There are however some areas where additional information and design alterations are required as identified in the foregoing report. Additionally, there are key junctions where the evidence provided to date gives rise to concerns relating to congestion and safety and these are not addressed. It is considered that without appropriate mitigation this application is likely to lead to an unacceptable impact on highway safety, and the residual cumulative impacts on the road network would be severe.

Further consideration will be given if additional information and clarification is provided as identified in this report and appropriate mitigation as recommended above.

Yours sincerely

Louise Rowlands
Principal Transport & Development Planner

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TH/OL/TH/20/1400 - Land South Of Westgate And Garlinge, MARGATE, Kent

Hybrid application for outline permission for provision of up to 2000 residential units (including up to 100 Extra Care units), care home (Use Class C2), two form entry primary school (Use Class F.1(a)), health facility (Use Class E(e)) and mixed use centre (Use Classes E(a-g), Sui Generis (drinking establishments and hot food takeaways)/C2/C3/F.1(a-g) and F.2 (ad), with vehicular access onto Dent de Lion Road, Garlinge High Street, Minster Road, Shottendane Road, Briary Close, Victoria Avenue, Belmont Road, and Brooke Avenue, along with new Primary Route Corridors between Shottendane Road and Minster Road and Shottendane Road and Dent De Lion Road, with all matters reserved, except access with; Full application for the erection of 120 residential units (within Class C3) forming Phase 1 including parking, access, landscaping, equipped play area, and other associated works

LAND AT WESTGATE ON SEA - Transport Assessment (TA) Comments

The highway authority has the following comments to make in relation to the submitted application documentation.

Transport Assessment**Section 2 - Policy Context**

2.2 – This commentary makes no reference to required off site highway contributions relating to the Thanet Transport Strategy Infrastructure Plan (or more specifically the Inner Circuit Route Improvement Strategy). These financial contributions are essential to ensure that the development proposals are fully compliant with local and regional policy and that the forecasts underpinning the Transport Assessment is appropriately based.

It is noted that reference to a proportionate contribution towards the TTSIP is made in the draft Section 106 Heads of Terms document, however no monetary value has been attributed at this stage. Therefore further Clarification is required.

Section 3 - Existing Conditions

3.2.10 – Whilst Shottendane Road is an important local road in terms of its function as an alternative route for local vehicle-based journeys, it does not currently mirror the geometrical standards of formal Local Distributor Road in accordance with the Kent Design Guide.

3.2.17 – 3.2.20 – On street parking currently takes place on Minster Road, which in turn can lead to an impediment to free flow of traffic on this route. Minster Road is to provide access to the site as early as Phase 2 according to the Transport Assessment (TA), and as build-out progresses attention needs to be given to possible mitigation of development traffic flows along this route to both the A28 and Shottendane Road.

As impact is yet to be fully determined, the highway authority would favour the carrying out of a parking review on Minster Road, as already done for Garlinge High Street, to inform new parking restrictions and provision of informal parking bays. It may be necessary to impose similar parking

restrictions along this route, possibly from the bend by Reculvers Road to the bend prior to the A28 junction. This could be offset by replacement parking on-site or through contributions to create parking elsewhere in proximity to Minster Road, however clearly this will have an impact on current residential parking amenity which will need to be considered by the Local Planning Authority (LPA) in line with the wider merits and disbenefits related to the application. It may be possible to consider a requirement to monitor this route, with a Section 106 contribution towards further schemes/restrictions as required, however the preference at this stage would be to agree the scope parking restrictions ahead of any problems arising. The plans also do not indicate any crossing improvements on Minster Road where it is met by the PROW TM23, which would likely need to be a Toucan crossing to cater for cycle movements along this route. This should be reviewed accordingly.

Section 4 - Accessibility to Facilities and Key services

Table 4-1 suggests that local amenities are within reachable walking distance, however this is not the case, and the NPPF seeks to encourage this for new development. Therefore, improvements to local public transport services and cycle infrastructure will be a key component in improving accessibility to existing services (in the absence of on-site provision being delivered). It is noted that some of the local shops located within the High Street have not been included within this table.

Section 5 - Development Proposals

5.2.9 – It is necessary for the applicant to supply all relevant CAD drawings relating to proposed improvements and road junctions on Shottendane Road. This will enable a full audit of the compatibility of these proposals with emerging KCC improvements on this part of the local road network. Once these have been received, further dialogue with the applicant and LPA will need to be held to agree final design requirements. This will ensure that the two projects are compatible with one another.

Section 5.2.11 – The new road junctions are noted, however it is necessary for the applicant to supply CAD drawings to enable the proposed geometry of these junctions to be assessed in line with wider upgrade proposals for the Shottendane Road corridor. Furthermore, any geometrical alteration to the highway under these proposals will need to be supported by a full vehicle tracking exercise.

5.2.14 & 5.2.17 – The proposed bus link to Brooke Avenue may be important to the delivery of financially sustainable local bus services and how they might access/integrate with the proposed development. Whilst this link is referred to in these paragraphs, there is currently uncertainty over its delivery, as it relies on land under the control of TDC and possibly other third parties. Clarification is required as to whether this link will form part of development proposals and how it might be secured through planning obligation.

If a bus gate is proposed then it is important to understand how this might be enforced, again further clarification is required. A tracking exercise for buses would also need to be carried out once the form of the junction is determined. Further to the assumption made in 3.2.26, it is known to us that no Section 38 agreement associated with the development behind Kingston Avenue is forthcoming, so such a link would need to be accessed off available highway land at the end of Brook Avenue.

5.2.15 - Both Victoria Avenue and Belmont Road are to terminate within the site, with speed tables and road narrowing denoting a change in setting. The Transport Assessment says only a small number of dwellings are proposed from these extensions, although it is not clear from the phasing plan as to how many of the proposed 293 dwellings tabled for phase 2 are expected to be served by these accesses. The highway authority would welcome clarification on this point.

Furthermore, the proposed speed table at the Victoria Road access may be incompatible with the proposed quiet cycle route designation – a more suitable form of speed attenuation should be found that will accommodate cycle users. Any complete access proposal would need to be subject to a Stage 1 Road Safety Audit and detailed design under a Section 278 agreement with the highway authority.

5.2.16 – Access from Briary Close is proposed in the form of a priority T junction, with a 4.8 metre width carriageway extending southwards. It is not clear in the Transport Assessment how many dwellings are to be served off this new junction, although it is assumed from the phasing plan that we would only be considering access for that part of phase 2, with the portion of phase 4 immediately to the south and west achieving access via phase 3. As highlighted above, it is necessary to clarify how many of the proposed 293 dwellings tables for phase 2 will be served by this access.

Further to this we would advise a PICADY analysis of the A28 junction with Briary Close to check that the theoretical capacity is not exceeded by this access proposal. Separate discussion should be held with Kent Fire and Rescue as to the provision of a suitable emergency access to the site, which would only be feasible from the south. This could, however, take the form of a shared cycle/footway, with at least 3.7 metres unobstructed width leading from the local centre and spine road. It is noted that emergency access will be possible as part of the intended phase 4 layout, however there may be some considerable time lag between phase 2 & phase 4 being delivered.

A previously approved planning application with access off Briary Close is committed to progressing a Traffic Regulation Order on that road. In the event of that development not coming forward, a similar obligation would need to be met by this separate element of the development proposals. This proposal for access would be further supported in our view by replacement on or off-street parking provision on-site for residents of Briary Close, adjacent to the point of access, along with a turning area within the new highway boundary.

Any complete access proposal would need to be subject to a Stage 1 Road Safety Audit and detailed design under a Section 278 agreement, along with vehicle tracking for a suitably sized refuse freighter. Clarification will need to be sought with TDC waste and recycling department to clarify which size vehicle currently services Briary Close.

5.2.26 - The methodology of every dwelling to be located within 400m of a bus service is welcomed, however further information is required in relation to how this will be achieved in practice. It is recommended that the access plan also shows indicative locations for bus stops within the development, along with crossing points on the spine road near the stops.

Further agreement and clarification needs to be achieved in relation to the proposed bus access strategy for the site, which may or may not be dictated by the feasibility of the Brook Avenue link, as this may have a bearing on bus routing within the site.

5.3 – Site layout comments for the detailed element of this application are addressed later within this response.

5.5.5 – In addition to the parking standards stated within this section, specific consideration needs to be given to the area of highway around the proposed primary school. It is suggested that adequate space is provided within the school site for pick-up and drop-off activity, and that the highway layout around the school should be furnished with additional on street parking areas designed into the street scene. Whilst it is accepted that this will form part of future reserved matters applications, the principles should be established at this stage within the masterplan. This does not appear to be the case at present.

Section 6 - Assessment Approach.

As outlined within the TA, the policies contained within the recently adopted Thanet Local Plan requires pre-identified strategic highway improvements to be funded in whole by strategic development sites. This avoids a site-by-site silo approach to highway mitigation that does not meet the longer-term needs of the local highway network.

In order to achieve robust longer-term infrastructure delivery it is accepted that a level of flexibility will be required by all parties to enable housing growth to be delivered whilst working towards the ultimate longer term highway solutions, however the highway authority needs assurances that the necessary level of funding from this site will be secured.

There are currently no triggers or monetary values stated within the draft Section 106 heads of terms, as such this does not currently provide sufficient confidence that the necessary funding will be secured at the most appropriate time, to mitigate the impacts of the development within the local highway network.

As such it may be necessary for further sensitivity testing to be examined by the applicant when considering relevant triggers in relation to infrastructure funding. The highway authority is concerned that at present no firm commitment has been given to off-site highway infrastructure funding. The highway authority would welcome further dialogue with the LPA and applicant in relation to the level of highway contributions to fully comment on the acceptability of the development proposals and the suitability of current 2031 scenario forecast assumptions.

6.1.1 – The scope of modelling included in Appendix A was facilitated by the highway authority at the request of the applicant. This does not represent an endorsement that the scenarios are acceptable trigger points for infrastructure phasing at this stage.

6.2.1 - The development proposals have been assessed using output provided directly from KCC's appointed consultant to the applicant, however any interim scenarios informing potential infrastructure phasing were produced without prejudice at the request of the applicant.

6.3.5 – It is important to highlight that the Thanet Transport Network Highway Model considers a select network of key links and junctions within the Thanet District, as such it does not include tertiary road links such as Park Road (Birchington), Birds Avenue (Garlinge) and Lymington Road (Westgate). Therefore, outputs from the model will not assess traffic impact on some highway routes. This does however ensure that primary and secondary traffic routes are robustly assessed, and appropriate mitigation can be identified to manage capacity within them.

The road improvements planned within the Thanet Transport Strategy are intended to provide good quality connections between Shottendane Road, Manston Road and the A28, which are intended to

discourage rat running along such tertiary routes. So whilst the absence of these links within the 2031 assessment is accepted, this is predicated on an appropriate contribution towards the TTS being secured and payable at a mutually agreeable trigger point. The absence of appropriate financial mitigation may lead to a requirement for more detailed assessment including the potential use of tertiary routes.

6.4.1 - Trip rates for the proposed development are agreed and are consistent with those used within recent Local Plan forecast assessments.

6.6.2 – Further commentary is required to reach an informed view on the appropriateness of this approach, however the highway authority understands that a recent change in the status of the DCO at Manston Airport has ensued and that the project now be subject to further review and decision making process. Therefore, the highway authority reserves the right to review the requirement for sensitivity testing should the future of the Airport be clarified between now and the determination of this application.

6.7.2 – The highway authority does not agree with the assertion that the Columbus Avenue Extension scheme is in some way uncertain at this stage. It remains an infrastructure project that was considered during the recent Local Plan examination. It is currently expected that in line with the Local Plan evidence base, that strategic sites are required to make an appropriate contribution towards the delivery of this link. It is unclear whether the applicant is challenging the need to provide funding towards this link and the TA draws no conclusions with respect to this matter. Clarification is therefore required.

6.7.3 – The scope of assessment has been agreed with KCC, however this is predicated on the assumption that all necessary contributions are secured from this development site towards the offsite sections of the Inner Circuit Route Improvement Strategy. There is also a requirement to consider the interim impacts of development and this has not been addressed within the current TA. Therefore, further clarification is required in relation to any potential infrastructure triggers. Please note that the 2031 Base (without Columbus Avenue Extension) was provided at the request of the applicant and not a specific requirement of the Highway Authority.

Section 7 - Local Highway Impact

7.2.1 & 7.2.2 – V/C should not be the only factor influencing further junction analysis. V/C outputs provide a high-level indication as to where there might be future capacity constraints or significant changes in junction capacity, but these outputs are not detailed enough to provide an absolute indication of network stress at a local level. Therefore, drawing conclusions from V/C outputs alone will not be sufficient in isolation. Subsequently a request was made by the highway authority that all junctions where the development created a 5% impact were considered in more detail. This is also indicated within section 6.3.8 of the TA.

Whilst the table presented in Appendix G provides data on the development impact on a junction-by-junction basis, the current information contained within the TA makes it very difficult assess absolute development impact at a wider network level. It is suggested that a local network diagram is produced to present this information in a more rational format. This will aid efficient evaluation as to the scope of junction assessments. It is also relevant to point out this appears to include the impact of Westgate and Birchington Strategic sites as a combined addition within the Do-Something network, so identifying specific development impact from Westgate is not possible.

7.2.3 – The scope of junction assessment is noted, however as the modelling scenarios assess the road network in 2031 with all associated Thanet Transport Strategy Infrastructure Plan interventions in place (and on-site infrastructure for other strategic sites). It is essential that an agreement is reached in relation to strategic highway contributions in line with the Local Plan evidence base, otherwise such forecasts will not be sound. It is also necessary for dialogue to be sought with the Birchington Strategic allocation in relation to perceived road infrastructure interdependencies. The southern link road between A28 and Acol Hill, provides an important link for traffic to and from the A28 avoiding more constrained areas of the Local Highway Network and conversely, the improvements provided by Westgate will, on Shottendane Road, be important to managing traffic impact from Birchington. Failure to agree necessary contributions and on-site infrastructure delivery triggers may compromise the soundness of current modelling forecasts and any future phasing plans (TBC).

7.2.6 – This is noted, however given that phasing plan indicates that the development will rely on access to the Shottendane Road corridor until the new link road and junction are provided, it is necessary to undertake further modelling to identify the impact of these subsequent phases of development on local junctions such as High Street/Shottendane Road.

7.2.7 – Given that this link is key to managing interim impacts of the development, there is a level of interdependency between the delivery of this on-site infrastructure and the delivery of the both the Westgate and Birchington Allocations, however the TA is relatively silent over when this infrastructure is likely to be delivered and what impact this will have to traffic flow on Manston Road/Shottendane Road within an interim phasing plan.

7.12.2 – This table provides an indication of cumulative impact between the Birchington and Westgate site, however this does not indicate what level of traffic distribution is directly attributed to each of the two development proposals or how traffic flows are affected by redistribution of background traffic within the do-minimum scenario. As such it is difficult to tell which development has the biggest impact on a given part of the local highway network. It is therefore further necessary for the outputs to be presented in a geographical network diagram.

Notwithstanding the above, there appears to be some unexpected traffic flow outputs between the Do-something Columbus Avenue and No Columbus Avenue scenarios which require further commentary from the applicant. A review of the various road links included within the table suggests that there are a significant number of additional vehicles attracted to the surrounding road network within the AM Do-something (CAE) when compared to the Do-something (No CAE) equivalent. Further analysis and commentary are required in order draw informed conclusions over the reasons for this. It may be possible that this is due to a redistribution in traffic from other parts of the network, outside of the immediate locality of the site, clarification is required. It is suggested that the modelling outputs are examined in more detail and appropriate commentary provided.

The highway authority would welcome the opportunity to discuss these outputs in more detail with the applicant prior to a more informed view being reached. The way in which modelling results are presented makes it extremely difficult to effectively compare two scenarios against one another and there is limited commentary provided within the TA.

7.13 – Whilst at face value, the TA appears to demonstrate that the first phase of the development is unlikely to generate any significant highway capacity issues. The spine road within the site and junctions onto Shottendane Road will not be delivered until Phase 3. This scenario has not been tested in terms of its impact on High Street Garlinge (junctions with both the A28 and Shottendane

Road). The TA only states that beyond Phase 1, it is expected that the spine road will be completed to Shottendane Road early on, with no reference to phasing. Therefore, further clarification is required. Given that visibility at the High Street Garlinge/Shottendane Road junction is relatively constrained, it is recommended that improvements are included as part of Phase 1 measures.

It is also stated that Phase 2 will provide a link to Minster Road to relieve Garlinge High Street, but again the submitted plans do not clearly indicate this. There appears to be a secondary route that would run through a public square, which would preferably be a pedestrian-dominated environment not suited to through traffic. This also lies just within the Phase 3 boundary, so would not be available in time to serve the first two phases.

The northern portion of Phase 2 appears to be cut off from the remainder of the development, where pedestrian/cycle access would be required to the PROW TM23 and local centre. This would need to be clarified on the Access and Movement Parameter and Phasing Plan.

Section 8 – Transport Strategy

8.3 Pedestrian and Cycle Infrastructure Improvements

The proposed off-site pedestrian and cycle network improvements along the proposed Victoria Avenue/The Grove route and Minster Road are welcomed in this proposal, subject to a Stage 1 Road Safety Audit and detailed design under a Section 278 agreement and discussion on timescale for delivery. It is further advised that Network Rail is contacted in relation to the proposed works on the footbridge connecting The Grove and Station Road. As the proposed route to the station and town centre is intended to increase cycle movements to those destinations, consideration should be given to assessing the existing levels of cycle parking provision and ascertaining where any additional provision can be made through this development.

8.4 Travel Plan

Generally, the highway authority is satisfied with the scope of the submitted draft Travel Plan, although subject to further assessment of impact on the highway network we may require it to be monitored by this authority. Travel Plan monitoring in instances where one is required to offset any adverse impacts on the network would be subject to further assessment and a monitoring fee. Furthermore, we would welcome the inclusion of any additional ‘hard’ measures, notwithstanding the proposed cycle vouchers, to encourage modal shift away from the private car. Typically for larger housing developments sustainable measures such as electric cycle provision, cycle hire, car sharing schemes, electric pool cars, bus vouchers are included, and we would welcome further dialogue on this point.

8.5 Public Transport

This proposes two strands to the provision of bus services to the wider development site, namely the re-routing of existing service 32 or 34 combined with a new standalone service running between the site and Margate, to provide a regular 15-minute interval service at full build-out. The potential changes to the local bus service network are noted, however to date only limited dialogue has been undertaken with local bus operators and no agreed position has currently been reached to inform potential pump prime funding for bus services and provisions within the draft Section 106 Agreement Heads of Terms.

Therefore, further dialogue will need to be sought by the applicant with the local Bus operators (Stagecoach) and the KCC Public Transport team before a full agreement can be reached over any potential changes to existing services (or alternatively the provision of new services). Full clarification over the potential Brooke Avenue bus link would be required to assist positive discussion, as it is evident that an extension to the existing route 32 may be the most cost-effective and practical way of delivering bus services into the site.

The alternative standalone solutions outlined within this section would rely on access via the constrained routes within Garlinge High Street (South) and Shottendane Road (prior to upgrade) and as such may not be possible without significant review of on street parking controls and geometrical improvements to accommodate bus movements.

8.6 Site Access Operation

The modelling outputs for junctions 1 & 2 are noted, however neither junction proposal appears to have been subject to a Stage 1 Road Safety Audit. Therefore, the highway authority is unable to make a fully informed assessment of the suitability of these proposals. Before this is undertaken it is recommended that further dialogue takes place with the KCC Major Capital projects teams to ensure that these proposals are consistent with wider proposals for the Shottendane Road corridor to avoid abortive Road Safety Audit work taking place. It is also unclear as to when these junctions are likely to be delivered, it is assumed that they form part of Phase 3, however further clarification is required.

Junction 3 – A28 Canterbury Road/Minster Road/St.Mildreds Road

The concept of providing improved pedestrian facilities at this junction is welcomed in theory, however further discussion and investigation will be required in relation to the introduction of proposed hooking arrangement on the A28 approaches. This junction used to operate as a two-way phased signal arrangement and was subsequently altered to a three-way phased approach. It is possible that this was due to issues identified in relation to conflicting hooking/ahead movements, which the development proposals now seek to reintroduce.

Therefore, it is necessary for the applicant to undertake revised junction testing for a scenario where hooking movements are removed, so that the merits of such an approach can be fully appraised. It is also necessary for full LINSIG junction model files to be provided for examination by the highway authority. In addition to the above, no Stage 1 Road Safety Audit has been appended to the TA and no vehicle swept path drawings are provided to assist the appraisal of this scheme proposal. As such KCC is unable to provide a fully informed steer in relation to the suitability of these proposals

Junction 4 – A28 Canterbury Road / Garlinge High Street

No Stage 1 Road Safety Audit (RSA) has been appended to the TA and no vehicle swept path drawings are provided to assist the appraisal of this scheme proposal. As such KCC is unable to provide a fully informed steer in relation to the suitability of these proposals. It is recommended that in the first instance the LINSIG Model files are sent to the Highway Authority for review then initial comments are fed back prior to the commissioning of the Stage 1 Road Safety Audit.

Junction 9 – St Nicholas Roundabout

No Stage 1 Road Safety Audit (RSA) has been appended to the TA and no vehicle swept path drawings are provided to assist the appraisal of this scheme proposal. As such KCC is unable to provide a fully informed steer in relation to the suitability of these proposals.

Garlinge High Street/Dent-De-Lion Road

Further to the independent Stage 1 Safety Audit, proposed off-site highway mitigation associated with this phase entails the re-prioritisation of Dent De Lion Road and the provision of semi-formal parking bays along both sides of High Street, with new parking restrictions elsewhere to accommodate two-way traffic flow. Plans have been submitted which should be subject to an additional audit, although the highway authority is satisfied with the principle of these proposals subject to swept path drawings demonstrating that traffic flow can be maintained without conflict. It is noted that there will be a net loss in on-street parking provision on High Street and Dent De Lion Road, although the degree of this is supported by a parking survey which was carried out at the beginning of the first COVID19 lockdown period, which means that observed parking levels were effectively at their peak, presenting a robust baseline for the survey. There was also found to be additional available capacity on other nearby streets.

Consequently, we would consider the benefits of the proposed mitigation to outweigh the loss of on-street parking however this will have an impact on residential parking amenity currently enjoyed by local residents and this should be balanced by the LPA against the wider merits of the development proposals.

The proposed alterations to Dent-De-Lion Road/High Street junction are not included within the red-line, so clarification required as to what is included within the Phase 1 application. It is recommended that the works to High Street are undertaken at the earliest possible juncture. Swept Path Drawings are required to assess proposed geometries.

Section 9 - Construction Traffic

This section briefly covers potential construction traffic movements with an undertaking to provide full details through a planning condition. At present, we cannot assess the impact of the additional HGV movements on the constrained local roads that would service the site, prior to any upgrading of Shottendane Road under the TDTS. We would therefore consider it appropriate at this stage, prior to determination, to provide a detailed Construction Traffic Management Plan for Phase 1 of development, exploring suitable site access arrangements and traffic management that could feasibly be extended to serve other phases via haulage roads as they build out, until such time when other transport infrastructure can be utilised.

Access to the School land

Generally, the phasing strategy appears to be designed in such a way that access to the school can be achieved on foot or cycle from all phases as development progresses, with the exception of the portion of phase 2 to the north of the development site, which will rely on phase 4 coming forward before access to the school can be achieved. We recommend that a shared pedestrian/cycle facility be provided between that portion of phase 2 and the school site on phase 3, to encourage sustainable travel to the school once built.

It is similarly important that the necessary pedestrian and cycle infrastructure is delivered between the school and all dwellings before the school is occupied, which we have recommended as a provision in the Section 106 agreement with KCC Education. For this purpose, we note from the Masterplan that although the existing PROW TM23 that runs diagonally through the site is to provide a sustainable travel corridor that provides access to the school, not all the phases seem to connect to it, although the Access and Movement Parameter plan indicates that the number and location of accesses onto into will be determined at detailed design. Access from Victoria Avenue as indicated on the Masterplan also seems incongruous with the proposal to make this a cycle route, which should extend as far as the school and local centre.

There are no pedestrian crossing facilities annotated on the masterplan or parameter to cater for pedestrian desire route between the school and phase 5 (across the new internal spine road for the development) and Phase 6 (across Minster Road), this will need to be clarified and the parameter plans amended as necessary.

The main access to the school should be located away from the proposed cul-de-sac extensions for Victoria Avenue and Belmont Road to discourage inappropriate parking within these constrained highway streets for school pick up and drop off activities associated with the school.

At the moment further clarification is required in relation to bus service provision through the site, however it would be expected that regular bus services would be running within 400m of the school site in order to encourage sustainable travel.

Phase 1 Full Application

In relation to the detailed element of the proposals for Phase 1, the following comments to made:

Access

- 1) Although not specified within the submitted Transport Assessment, the established trip rate in section 6.4 would mean that the first phase of 120 dwellings would be expected to generate 65 movements in the AM peak and 54 in the PM peak. This would result in approximately 1 new vehicle movement on Garlinge High Street every minute in the network peaks. It should be further noted that the spine road of the proposed first phase effectively bypasses the most constrained section of Garlinge High Street, meaning that traffic will be distributed either directly towards the A28 to the north or Shottendane Road to the south.
- 2) Generally the relevant junction outputs for phase 1 are accepted, although further attention should be given to the junction of Garlinge High Street/Shottendane Road. We would welcome a proposal for a scheme to improve visibility, especially to the west along Shottendane Road.
- 3) The direct site accesses to phase 1 further re-prioritise the proposed spine road through the site at the junction with Dent De Lion Road and High Street. These alterations to the highway and the propose spine road have also been subject to a Stage 1 Safety Audit, which found no safety concerns with respect to road geometry. Further to this we have no cause to object to the principle of the site accesses and spine road, subject to detailed design under the relevant Section 38 and 278 agreements. I note however, that the required visibility splay at the new junction of Dent De Lion Road with the proposed spine road is missing from the submitted adoption plan, which would need to be included for the sake of completeness.

- 4) Further to the submitted adoption plan we would also require a lighting plan, to check there is no conflict with proposed tree planting and a services plan, to ensure that all proposed highway meets with adoptable standards.

Layout

- 5) Tracking for an 11.2 metre refuse vehicle is shown on the plans. Thanet Waste and Recycling have specified regular use of refuse freighters totalling 13 metres in length, when an additional slave bin module is attached. The specification should be obtainable from them for the purpose of any tracking exercise.
- 6) There are a couple of gated rear parking courts (serving plots 14-17 and 37-40) with visitor parking outside on the access way which will not allow for turning. This may require redesign to prevent vehicles having to reverse onto the spine road.
- 7) The footway on the secondary road is only 2 metres in width, although this provides a route to/from Garlinge High Street. We would recommend that this road too has a 3-metre shared path like the spine road.
- 8) Other paths linking to the existing PROW should also facilitate shared use for pedestrians and cycles, on this phase there would be three such connections. Only two appear to be clearly marked on the site layout, the middle route that should run alongside plot 28 westwards is not currently shown. These paths should also consist of a bound surface.
- 9) The play area is only accessed via a 40-metre-long shared surface, so additional pedestrian conflict is likely.
- 10) Generally parking is adequate but some additional visitor spaces are recommended, to specifically offset tandem parking arrangements, which we have found are often under-utilised. Consequently, I would recommend the following additional visitor parking bays:
 - Street serving plots 31-34, 36 and 56-57 – 1 additional required
 - Shared drive serving plots 37-40 – 2 additional required
 - Street serving plots 41-45, 58, 67-69 – Existing visitor bays redistributed to better serve plots 42, 42, 68 and 69.
 - Shared drive serving plots 59-63 – 3 required
 - Shared drive serving plots 70-74 – 2 required
 - Shared drive serving plots 85-88 – 1 required
 - Shared surface serving plots 89-102 – Existing bay moved closer to plot 99, 1 additional to serve plots 91-92
 - Shared drive serving plots 103-106 – 2 required
 - Parking court serving flats 107-112 – 1 required
 - Plots 113-120 – 2 required
- 11) The inclusion of electric vehicle charging within these proposals is welcomed. A degree of future proofing is required, in that any remaining communal spaces are provided with passive infrastructure to allow for additional charging points as required. This need can be assessed and actioned through the final iteration of the Travel Plan.

In conclusion, it is recognised that a significant number of matters have been raised in relation to information submitted. Therefore, the highway authority recommend that a meeting is held with the applicant in order to seek positive resolutions on the matters raised. Until such time that these issues have been clarified/resolved, the highway authority wishes to lodge a holding objection to these development proposals.



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27 November 2020

Dear Anna

Re: Otham Parish Neighbourhood Plan 2020-2035 - Regulation 16 Consultation

Thank you for consulting Kent County Council (KCC) on the Otham Parish Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the Neighbourhood Plan.

5. Enhancing green space and biodiversity value

Policy GS4/GS5

The County Council is supportive of the policies that seek to safeguard informal meadows/natural corridors, ancient woodland and hedgerows.

7. Promoting active and sustainable travel

7.3 Aims

The County Council, as Local Highway Authority, is supportive of the aims set out within the Neighbourhood Plan, which are largely focused on ensuring that new developments are afforded good accessibility by sustainable transport modes.

7.4 Policies

Policy ST3 - The County Council recommends that reference is made to public transport within this policy.

Policy ST4 - The County Council welcomes the reference to the Rights of Way Improvement Plan (ROWIP). The County Council is supportive of the development and protection of PRow, which in turn, support the rural economy and provision of access to green space. The references to walking and cycling throughout the document are generally supported.

The County Council has adopted a policy of ensuring accessible access across the PRow network and would support measures to replace stiles with more accessible structures, although it is acknowledged that authorised stiles cannot be removed without the agreement of the landowner/occupier. If a structure is not needed to prevent the ingress/egress of livestock, KCC would recommend replacing the stile with a structure gap instead of a stile, as this would improve accessibility and require less future maintenance. Taking these points into account, the wording of policy ST4, which considers KM94, should be revised to:

Efforts should be made to improve the accessibility of Public Footpath KM94, so that it is suitable for wheelchair and pushchair users, by replacing the existing stile with a structured gap or gate and enhancing the path surface where possible.

Policy ST5

Public Right of Way (PRow): Given that there are Public Bridleways and a Restricted Byway passing through the Parish, the wording of this policy should be revised to reflect the different types of PRow classification:

Subject to other considerations within the plan, development adjacent to public rights of way should not adversely affect their amenity as a leisure facility, cause undue harm to the views of the North Downs or have an adverse impact on the Heritage Walks identified on map GS2 and in Appendix 3.

8. Managing the built environment

Policy BE1

Highways and Transportation: This policy should also refer to the role of cycling and public transport within larger development sites.

Sustainable Urban Drainage Systems: The County Council notes that the Neighbourhood Plan recognises the importance of enhancing green space and biodiversity value, but there is currently no reference in the document to the water environment. It should be highlighted that Maidstone's Green and Blue Infrastructure Strategy addresses green and blue corridors, as well as blue infrastructure.

A tributary of the River Len traverses Otham and is an important corridor. The land within the Parish is permeable, being underlain by the Hythe Formation, however, the management

of surface water for any new development is very important to manage local flood risk and to ensure that appropriate approaches to the surface water drainage are implemented.

The County Council, as Lead Local Flood Authority, recommends that the Neighbourhood Plan should consider the water environment within the Parish. This should include the consideration of the types of surface water management which the Parish would like to see implemented. The NPPF Paragraph 165 specifically requires major developments to incorporate sustainable drainage systems which, where possible, should provide multifunctional benefits. The Parish should require that all development drainage systems are at surface and provide water quality benefits, promote amenity and increase biodiversity.

The County Council recommends that KCC's Drainage and Planning Policy¹ is considered within the Neighbourhood Plan.

Biodiversity: The County Council welcomes the policies which safeguard informal meadows/natural corridors, ancient woodland and hedgerows. KCC is also supportive of the policies which cover ecosystem services (BE3) and limiting light pollution (BE4). The policies should be expanded further to ensure that biodiversity concerns are fully addressed. The County Council would like to raise the following points:

- Fragmentation of habitats is a major threat to biodiversity in the south-east. As ecological surveys of the Otham area have not been undertaken, it is difficult to see how Otham's habitat connectivity can be maintained and, therefore, biodiversity adequately protected.
- There is no mention of protected species and how site-specific ecological surveys should inform development projects.
- Otham's agriculture is referenced as an important feature but for optimal crop production, pollinators and their (wildflower) habitats need to be given more emphasis and protection. More meadow grassland (with appropriate management) and native planting are key measures to achieve this.
- Bicknor Wood (ancient woodland, which is afforded a high level of protection) may not be sufficiently protected from development, even with a minimum of a 15m buffer zone. It is recommended that development around Bicknor Wood should include a buffer much wider than 15m where possible.

Ultimately, strengthening policies to benefit biodiversity will result in a higher agricultural output and less severe flood and drought events. A comprehensive ecological survey would allow a much clearer idea of where the most biodiversity value is and how it can be maintained going forward.

Policy BE2

Waste Management: waste collection is the responsibility of the Waste Collection Authority (in this case Maidstone Borough Council), however, KCC as Waste Management Authority,

¹ <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/flooding-and-drainage-policies/drainage-and-planning-policy-statement>

welcomes the promotion of sustainable development in terms of waste management and ensuring adequate recycling provision is made.

Policy BE3

Biodiversity: 'Green planting' within Policy BE3 should be replaced with 'native species planting' because native vegetation supports the faunal basis for ecosystems (invertebrates) whereas many non-native common garden plants do not.

Sustainable Business and Communities: The County Council welcomes the Neighbourhood Plan's intention to encourage sustainable development and supports its inclusion of policies that require high standards of energy and water efficiency in building design, promote active travel and enhance ecosystem services. This could be further enhanced by the inclusion of Net Zero targets to support delivery of the Kent and Medway Energy and Low Emissions Strategy².

The Neighbourhood Plan does not currently consider the impact of future climate change risks (such as hotter, drier summers and warmer, wetter winters) which are outlined in the Kent Climate Change Risk and Impact Assessment³. The County Council would encourage the inclusion of policies that increase the Parish's resilience to these climate change risks.

9. Community and Leisure

Policy CL1

Highways and Transportation: Criteria 1 of Policy CL1 should include reference to the County Council. This would ensure that the access arrangements are supported by the Local Highway Authority, as well as the residents.

Kent Sport: As part of the Kent Design Guide, the County Council is currently compiling local examples to sit alongside the ten Sport England Active Design principles⁴. It is clear that consideration has been given to community and leisure, with the potential for a new village hall and the heritage walks around the community captured in the Neighbourhood Plan.

The Neighbourhood Plan should consider how the community facilities are linked, to limit car usage where possible. This should include active travel links such as walking and/or cycling routes between key points in the area. This could potentially include schools, parks, green space, local shops and the new village hall.

Both Government and Sport England strategies for sport focus on tackling inactivity and supporting under-represented groups to be active and this would need to be considered as part of any funding bid for the new village hall development. The County Council would draw attention to the Sport England Planning Guidance⁵. Sport England also runs two surveys

² [Kent and Medway Energy and Low Emissions Strategy](#)

³ [Kent Climate Change Risk and Impact Assessment](#)

⁴ <https://www.sportengland.org/facilities-planning/active-design/>

⁵ <https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/>

<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/>
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/facilities-planning-model/>

that would be useful to take account of; “Active Lives Adult”, published twice a year and “Active Lives Children and Young People”, published annually. Both survey publications provide a unique and comprehensive view of how people are getting active and the results can be analysed at a local authority level. The latest adult report is available for review⁶. It is possible to explore and filter the data using the online tool⁷. A summary of the Children and Young People report is also available for review⁸.

The latest figures indicate that inactivity significantly impacts an individual’s physical and mental health, as well as social and community cohesion. Any development should seek to provide a mix of formal and informal areas/spaces (indoor and outside) where people can be active, including walking and cycling routes, open spaces and, where appropriate, water based activity.

Planning Obligations

There is no reference to the Community Infrastructure Levy (CIL) contributions within the Neighbourhood Plan. Whilst it is acknowledged that the Government is considering substantial reforms to the planning system, Parish Councils are currently eligible for significant CIL funding opportunities from development. The County Council would welcome further engagement with the Parish Council to discuss potential spending priorities.

Minerals and Waste

The Neighbourhood Plan should include reference to the adopted (and recently partially reviewed) Kent Minerals and Waste Local Plan 2013-30.

The area contains the safeguarded land-won mineral - Crustal deposits - Hythe Formation (Limestone-Ragstone). It is noted that the Plan does not propose any additional allocations for development beyond those already identified in the adopted Maidstone Local Plan. The allocations in the Maidstone Local Plan were considered against the need to safeguard minerals of known economic importance which are coincident with development allocations. At the examination of the Local Plan, the Inspector considered the need to consider the safeguarded Hythe Formation (Limestone-Ragstone) and the coincident allocations proposed. The Inspector concluded that there was evidence available to demonstrate that the land-bank (in excess of thirty years) for this mineral greatly exceeded the NPPF maintained land-bank requirements. It also concluded that the extensive occurrence of the mineral across the Maidstone Borough meant that the development allocations within the Local Plan coincident with this mineral were exempt from further safeguarding considerations. Therefore, it is not necessary to consider the need for mineral safeguarding in the Otham Neighbourhood Plan.

<https://www.sportengland.org/facilities-planning/active-design/>

<https://www.sportengland.org/facilities-planning/planning-for-sport/playing-fields-policy/>

⁶ <https://www.sportengland.org/activelivesapr20>

⁷ [Active Lives Online tool](#)

⁸ <https://www.sportengland.org/news/active-lives-children-and-young-people-survey-academic-year-201819-report-published>

KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in blue ink that reads "B. Cooper". The signature is written in a cursive style with a large initial 'B'.

Barbara Cooper
Corporate Director – Growth, Environment and Transport



Environment, Planning and Enforcement

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Maidstone
Kent
ME14 1XX

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Ask for: Francesca Potter
Email: francesca.potter@kent.gov.uk

11 December 2020

Mrs L Ham,
Clerk
The Old Fire Station
Stone Street
Cranbrook
Kent TN17 3HF

BY EMAIL ONLY

Dear Mrs Ham,

Re: Cranbrook and Sissinghurst Neighbourhood Plan Pre-submission - Regulation 14 Consultation

Thank you for consulting Kent County Council (KCC) on the Cranbrook and Sissinghurst Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the Neighbourhood Plan.

2. Vision and Objectives

Community Provision

Sport and Recreation: The County Council welcomes the focus on active travel within the Local Plan. Government and Sport England strategies for sport are focussed on tackling inactivity and supporting under-represented groups to be physically active should be considered. The County Council would also recommend consideration is given to Sport England planning guidance and local data around physical activity levels¹.

¹ <https://www.sportengland.org/facilities-planning/planning-for-sport/playing-fields-policy/>
<https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/>
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/>
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/facilities-planning-model/>
<https://www.sportengland.org/facilities-planning/active-design/>

The County Council would also draw attention to the Sport England survey: “Active Lives Adult”, which is published twice a year (and replaced the “Active People” Survey) and the “Active Lives Children and Young People”, published annually. Both surveys provide a unique and comprehensive view as to physical activity in a neighbourhood, and can be analysed at a local authority level. The latest adult report is available² and data can be explored and filtered³. A summary of the “Active Lives Children and Young People” report is also available⁴.

The latest figures indicate that inactivity significantly impacts on an individual’s physical and mental health, as well as social and community development. Therefore, the Neighbourhood Plan should seek to ensure the provision of a mix of formal and informal areas/spaces (indoor and out) where people can be active, including walking and cycling routes, open spaces and water based activity, as appropriate.

3. Landscape and the Natural Environment

Minerals and waste: The County Council, as Minerals and Waste Planning Authority, recommends that reference is made to minerals (land-won) and minerals/waste infrastructure safeguarding, as set out by the policies CSM 5, CSM 7 and CSW 16 of the adopted (and recently partially reviewed) Kent Minerals and Waste Local Plan 2013-30 (KMLWP). The Neighbourhood Plan area has the following safeguarded land-won minerals:

Superficial Deposits - Sub-Alluvial River Terrace Deposits
Crustal deposits - Sandstone -Tunbridge Wells Sand Formation

KCC recognises that the Neighbourhood Plan does not propose any additional allocations for development other than those identified in the emerging Tunbridge Wells Local Plan (TWLP). The need to safeguard minerals of known economic importance that are coincident with development allocations is being considered in the Local Plan process. However, the existence of safeguarded minerals should be referred to within the Neighbourhood Plan as an important consideration for any development in the area.

The only significant safeguarded minerals or waste management infrastructure in the Neighbourhood Plan area is the Southern Water Services Ltd site at Waterloo Road, Cranbrook. Any development within 250m of this site should have due consideration of the KMLWP.

Heritage Conservation: The County Council welcomes the references to the historic aspect of the Cranbrook landscape. The landscape present today is the result of many centuries of interaction between humans and nature and this is evident in the modern landscape in the form of tracks, lanes, field boundaries, woodlands and archaeological sites. The County Council would recommend that reference is made to the Historic Landscape Characterisation dataset (2017)⁵ created by the High Weald AONB Team, Tunbridge Wells Borough Council and KCC. The characterisation is the most detailed assessment of the

² <https://www.sportengland.org/activelivesapr20>

³ [Active Lives Online tool](#)

⁴ <https://www.sportengland.org/news/active-lives-children-and-young-people-survey-academic-year-201819-report-published>

⁵ <https://www.tunbridgewells.gov.uk/planning/planning-policy/local-plan/evidence/environment-and-landscape/historic-landscape-characterisation-2017>

historicity of the visible landscape and is an essential starting point for any consideration of historic landscapes in the area.

Sustainable Business and Communities: The County Council welcomes the focus on sustainability, the environment and climate change throughout the Neighbourhood Plan. Furthermore, KCC welcomes the Neighbourhood Plan's support of Tunbridge Wells Borough Council's net-zero target of 2030, which in turn supports the Kent and Medway Energy and Low Emissions Strategy target of Net Zero for the county by 2050.

The County Council would welcome reference to the Energy and Low Emissions Strategy (ELES). The ELES outlines Kent and Medway's ambition to reduce greenhouse gas emissions to net-zero emissions by 2050. Taking an evidence based approach, it identifies a pathway to reduce greenhouse gas emissions, eliminate poor air quality, reduce fuel poverty, and promote the development of an affordable, clean and secure energy supply for the county.

The County Council notes the consideration of risks resulting from climate change to Cranbrook and Sissinghurst in respect of the potential for flooding. KCC recommends consideration of the Climate Change Risk and Impact Assessment (CCRiA), which provides some more insight into the risks that Kent and Medway face from climate change⁶.

Draft Policy LN7.1 - Special Sites for Nature Conservation

Biodiversity: To provide greater certainty, the County Council recommends that where policy statements refer to 'should', this should be revised to 'will'.

KCC recommends that the information in the 'Green Spaces and Green Networks for People' map should be separated to ensure it can be clearly interpreted. This could either be by dividing up the parish into smaller sections presented in larger scale maps, or by providing two or three maps for the whole parish, with some of the information in each map.

Clarity should be provided within the legend 'Kent Council LNR and RNR', which should identify Local Wildlife Sites and Roadside Nature Reserves and should be separated into two categories. If possible, the map should identify the Roadside Nature Reserve in the parish which lies along the western boundary of Sissinghurst Park Wood and Crane Valley Local Nature Reserve.

The County Council questions the necessity for the buffers within the 'Green Spaces and Green Networks for People' map and the lack of policy reference to these buffers. The County Council recommends that reference to green networks for people is also captured within policy or supportive text to ensure the purpose of the map is clear.

The County Council is in principle supportive of the intention of Draft Policy LN7.1, but proposes the following amendments:

⁶ <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/environmental-policies/kents-changing-climate>

- a) Development proposals which have potential to impact on the statutory and non-statutory designated sites as shown on High Weald AONB Unit Map “statutory and non-statutory designated sites” on page 17 will demonstrate that they have ~~identified and considered their~~ assessed and addressed the potential impacts on the nature conservation interest of the sites.
- b) Proposals adjacent to such sites ~~should~~ will be buffered to avoid and minimise damage including from indirect impacts such as increased recreational pressure, which will be considered alongside more direct impacts.
- c) Such developments ~~should~~ will deliver a net gain in biodiversity. Firstly, within the development site, or if demonstrably not achievable, biodiversity net gain will be delivered within or very close to the parish. Planning conditions and obligations will secure the protection and appropriate management of nature conservation sites in perpetuity, in line with the High Weald AONB Management Plan aspirations.

Draft Policy LN7.2 - Special Ecological Protection & Enhancement

Biodiversity: There is a lack of connection between the aims of this policy and the information presented in the associated map. The supporting text refers to woodlands, ponds, hedgerows and watercourses, but the map shows a wider range of habitats, all of which currently make up the ecological network across the Neighbourhood Plan area. While these habitats are all of ecological value, their importance in the context of this policy could be refined; or, if the intention is to ensure that the habitats presented in the map are considered to all be important ecological assets for the parish (which is presumed is the case), this should be more clearly stated in the supporting text. Clarification of what is meant by ecological networks should also be provided, with geodiversity features indicated on the map. Proposed policy wording amendments are as follows:

- a) Developments which actively support and enable the protection, enhancement and active positive management to conserve and enhance ~~ecological~~ biodiversity and ecological networks ~~and geodiversity~~ will be supported. as identified on High Weald AONB Unit “Green and Blue Infrastructure and Ecological Networks” on page 19.
- b) Development proposals resulting in significant negative impacts on biodiversity and geodiversity will not be supported unless clear and significant biodiversity gains can be demonstrated as compensation. Biodiversity net gain should be determined by applying the biodiversity impact calculator, or whatever supersedes it in the future, such as DEFRA’s Biodiversity Metric 2.0 calculator.

Draft Policy LN7.3 - Ecological Connectivity

Biodiversity: The County Council recommends the following proposed policy wording amendments:

- a) ~~In considering~~ All development proposals will identify, consider and address, ~~both individually and cumulatively,~~ impacts on ecological connectivity, both individually and cumulatively. ~~should be identified and considered.~~
- b) Functional green infrastructure (including naturalistic planting of native species known to be beneficial for local biodiversity) around and through new developments

~~should~~ will enable permeability for wildlife ~~both around and through new developments.~~

- c) Where roads create potential barriers to species movement, overarching trees ~~should~~ will be protected to allow the movement of aerial and arboreal species (invertebrates, birds, bats, dormouse etc.)
- d) Planning conditions and obligations ~~should~~ will secure appropriate habitat management and continued ecological connectivity in perpetuity.

Draft Policy LN7.4 - Protection & Enhancement of Priority Habitats

Biodiversity: The intention of clause (a) in the policy is unclear – the County Council proposes the following amendments to provide better clarity, but is happy to discuss further if necessary:

- a) Priority habitats within and adjacent to development proposals will be identified, considered and protected in line with their status. ~~In considering development proposals impacting priority habitats, their nature conservation value should be identified, considered and protected in line with their status.~~
- b) Development proposals resulting in the loss of irreplaceable priority habitats such as ancient woodland, traditional orchards and veteran trees will be refused.
- c) Development proposals adjacent to ~~such~~ priority habitats ~~should~~ will be buffered to minimise damage. Planning conditions and obligations ~~should~~ will secure the protection and appropriate management of these habitats in perpetuity, in accordance with the relevant designations.

Draft Policy LN7.5 - Protection of Priority Species

Biodiversity: The County Council recommends the following proposed policy wording amendments:

- a) Development proposals ~~should~~ will be supported by complete independent ecological surveys carried out by a suitably qualified ecologist according to nationally accepted standards.
- b) ~~In considering~~ Development proposals ~~impacting~~ will identify and address impacts to ~~consider and protect~~ legally protected and priority species in line with their nature conservation value ~~should be considered and protected in line with their~~ and status. Such developments ~~should~~ will deliver a net gain in biodiversity.
- c) Development proposals will include bat-sensitive lighting design.
- d) Planning conditions and obligations ~~should~~ will secure all necessary avoidance, mitigation and compensation measures to ensure species protection and appropriate habitat management in perpetuity. ~~in accordance with the species designation, and prior to starting development work, developers will be expected to join the district level licensing scheme.~~

The County Council suggests the removal of the last sentence of clause (d) as district level licensing is one option available for great crested newt compensation. Developers are still able to use the traditional licensing approach and this may be more appropriate for some sites.

The County Council recommends reference to bat-sensitive lighting design requirement. Supporting text should be added to refer to the guidance document *Bat Conservation Trust & Institute of Lighting Professionals' Guidance Note 08/18 Bats and artificial lighting in the UK*.

Draft Policy LN7.6 - Biodiversity Enhancements

Biodiversity: The County Council recommends the following proposed policy wording amendments:

- a) Development proposals that include ~~ing~~ biodiversity enhancements (over and above the requirements to avoid, mitigate and compensate for impacts on habitats and species) will be favoured.
- b) As a minimum, new developments ~~should~~ will include integrated bat and bird boxes ~~connected to suitable habitats (including~~ and naturalistic planting of native species known to be beneficial for local biodiversity. ~~with sensitive lighting design.~~ Planning conditions and obligations ~~should~~ will secure biodiversity enhancements on development sites in perpetuity.

Draft Policy LN7.9 - Protecting the Historic Landscape Character

Heritage Conservation: The County Council is generally supportive of this policy. However, clause a) implies that the historic character of the landscape is only visible in the treescape, ancient hedgerow, watercourse network and species-rich roadside verges. The historic landscape has rather more components to it than this, though, and includes the patterns of tracks, lanes, field boundaries and archaeological sites that help define the form of the modern landscape. The patterns of tracks and lanes are particularly important as these show the communications routes that linked communities and those communities in turn with places of work. New development should be encouraged to incorporate these patterns in their masterplans as this helps the new development integrate into the existing communities more effectively.

Draft Policy LN7.13 Local Green Space Designations

Heritage Conservation: The draft text identifies a large number of local green spaces that the Neighbourhood Plan wishes to conserve. As the text notes, some of these are of historic importance. The Kent Gardens Trust has recently assessed a number of green spaces and gardens for their historic significance and the method they used would be helpful for the Neighbourhood Plan in assessing the importance of the spaces to be protected⁷.

4. Design & Heritage

Heritage Conservation: In reviewing the heritage of Cranbrook parish, the text at present begins with the Anglo-Saxon period. It is true that the landscape today is largely a product of the Anglo-Saxon and later periods, and in particular the medieval period, but the earlier use

⁷ <https://www.kentgardenstrust.org.uk/research-projects/reports/?proild=1>

of the landscape of Cranbrook must be included. This has contributed to the historic character of the parish, and archaeological remains relating to these earlier uses can still be found. Numerous Mesolithic and Neolithic flint artefacts have been found across Cranbrook, reflecting the use of the Weald by hunter gatherer populations for thousands of years. The Romans certainly exploited the Weald as evidenced by the Rochester to Hastings Roman road that runs through the parish and which survives archaeologically in many places, for example at Folly Gill. The Romans also began the exploitation of the Weald for iron. Roman iron production is evidenced by the scheduled monument at Little Farningham Farm, which may be the best example of a Roman iron working site, certainly in Kent. There is no other known Roman site in Cranbrook but it is probable that landscape features such as ponds and streams may yet prove to have Roman origins. Iron production was greatly expanded during the Elizabethan period when the invention of the blast furnace allowed the rapid expansion of the industry. Many examples of iron working sites survive across the Weald, both as archaeological sites and as place names (eg Furnace Farm, Hammer Pond etc) and many more no doubt remain undiscovered. Cranbrook itself is known to have been the site of such a furnace.

Section 5.4 of the Tunbridge Wells BC Historic Environment Review reviews the heritage of Roman and Medieval iron working in the Weald which is both extensive and important and should be drawn on for the text.⁸ The Review should indeed be drawn upon much more systematically for the Neighbourhood Plan, as at present the review of the heritage of the parish is very partial and does not underscore the essential contribution that it makes to the character and beauty of the landscape. A clearer period by period review of the heritage, highlighting the known sites and drawing on the Historic Environment Review as appropriate, would enable the heritage of the parish to play its full role in securing the character of Cranbrook in the future, whilst allowing users of the Neighbourhood Plan to understand its conservation needs.

Draft Policy DH1.12 Protection of Agricultural Heritage Assets

Heritage Conservation: The draft text rightly commits the Neighbourhood Plan maintaining the dispersed settlement pattern that is prevalent in the Weald and to permitting a degree of sympathetic development in farmsteads. Historic England (together with KCC and the Kent Downs AONB team) has published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character of the countryside. Consideration and reference should be made to this guidance⁹.

Draft Policy DH1.13 Cranbrook Windmill

Heritage Conservation: The County Council welcomes the incorporation of a policy that relates specifically to the (KCC-owned) Cranbrook Windmill.

⁸ (https://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0008/343808/Historic_Environment_Review.pdf)

⁹ <http://www.kentdowns.org.uk/publications/kent-downs-aonb-farmstead-guidance>

It could be expanded by referring to the authentic design characteristics of the exterior ('character'), the internal milling machinery and records of the former internal layout ('operation') and the historic fabric of the building ('structure').

KCC also welcomes the commitment within the Neighbourhood Plan to protect the mill's wind (clause b) as this is something that is often forgotten leading to the mill's operation being compromised.

5. Access and Movement

Draft Policy AM4.2 - Pedestrian Priority and Public Rights of Way

Public Rights of Way (PRoW): This policy is welcomed and supported, though an additional paragraph should be inserted into the 'Policy Supporting Text' to clearly highlight the Rights of Way Improvement Plan (ROWIP). This is because the ROWIP is a statutory policy document, setting out a strategic approach for the protection and enhancement of PRoW.

The Neighbourhood Plan should ensure that reference to the ROWIP is clearly highlighted. This will enable successful partnership working to continue, helping to deliver improvements to the PRoW network in Cranbrook and Sissinghurst.

Given the value of the PRoW network to the local community, there should be a requirement for development applications to show recorded PRoW on their plans. Where PRoW would be directly affected by new development, proposals should illustrate how the PRoW network will be positively accommodated within the site.

Additional text should be inserted into the policy, recommending that applicants for new developments engage with the KCC PRoW and Access Service at the earliest opportunity. This would allow the County Council to review proposals for access improvements and consider appropriate developer contributions for PRoW network enhancements, which would ensure there are sustainable transport choices available that provide realistic alternatives to short distance car journeys.

The PRoW and Access Service would welcome engagement with the Parish Council to consider local aspirations for access improvements, the delivery of these projects and potential sources of funding for the works.

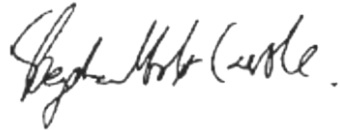
Glossary of Terms

PRoW should be revised to state:

"A way over which the public have a right to pass and repass, including; Public Footpaths, Public Bridleways, Restricted Byways and Byways Open to All Traffic"

KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Stephanie Holt-Castle'.

Stephanie Holt-Castle

Interim Director - Environment, Planning and Enforcement

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Benenden NDP,
 Planning Policy,
 Planning Services,
 Tunbridge Wells Borough Council,
 Royal Tunbridge Wells,
 Kent TN1 1RS

BY EMAIL ONLY

Environment, Planning and Enforcement

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 County Hall
 MAIDSTONE
 Kent ME14 1XX

Phone: 03000 415673
 Ask for: Francesca Potter
 Email: Francesca.Potter@kent.gov.uk

11 December 2020

Dear Sir/Madam,

Re: Benenden Parish Neighbourhood Development Plan 2020-2036

Thank you for consulting Kent County Council (KCC) on the Benenden Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the Neighbourhood Plan.

Introducing Benenden Neighbourhood Development Plan

The Historic Context of Benenden Parish

Heritage Conservation: The introduction to the Neighbourhood Plan describes in detail the extent and importance of Benenden's heritage and the role it has played in shaping the Parish. The County Council therefore recommends that the Neighbourhood Plan should include policies for conserving and enhancing this heritage. The Neighbourhood Plan provides an opportunity for the Parish Council to describe how Benenden's heritage can contribute to achieving the Vision for the area. This could be by helping to integrate new development into the existing area, by ensuring that new build contributes to existing historic character and by emphasising the role of the historic environment as a contributor to the 'historic beauty' that the plan wants to preserve. Heritage also has a significant role to play in the health and well-being of residents and visitors.

The role of the historic environment is at best indirectly mentioned in some of the draft policies, but unless there is a specific historic environment policy, it will be easy for the historic character to be eroded as its needs are disregarded in favour of other issues for which formal policies have been developed.

The text mentions the Roman roads that cross Benenden and the settlement at Hemsted, but there are numerous other Roman sites in the parish. These include a paved Roman ford near Stream Farm and iron working sites at Spring Wood, Benenden School and Flight Wood. The Benenden school site may have also comprised a small roadside settlement

Chapter 1 Landscape and the Environment

The policies – Landscape

Heritage Conservation: The text rightly notes the historic nature of the landscape and some of its components in the form of field boundaries, footpaths and routeways. The County Council recommends reference to the Historic Landscape Characterisation (HLC) for Tunbridge Wells Borough that was developed by the Borough Council in 2017¹. The HLC examined the Borough's landscape in detail and is an important tool for helping developers and planners assess the impact of their proposals. An assessment of their proposals against the HLC should be a requirement for preparing development proposals in rural areas.

The text does not specifically mention development within farmsteads, but it is likely that development proposals of this type will come forward. It should be noted that much of Kent has historically had a dispersed settlement pattern. Development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. Historic England, KCC and Kent's AONB teams have published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character².

Policy LE1 Protect and Enhance the Countryside

Biodiversity: The phrase "where possible" should be removed from the last section of the policy, as mandatory biodiversity net-gain is already required by national planning policy and developers will soon be required to demonstrate *measurable* net-gain. As such, ecological enhancement must be included in all developments.

Sport and Recreation: The County Council recommends consideration of Government and Sport England strategies for sport, which are focussed on tackling inactivity and supporting under-represented groups to be active. The County Council would also recommend consideration is given to Sport England planning guidance and local data around activity³.

¹ <https://beta.tunbridgewells.gov.uk/local-plan/evidence/resources/environment-and-landscape/historic-landscape-characterisation-2017>

² <http://www.highweald.org/look-after/buildings/farmsteads-and-hamlets.html>

³ <https://www.sportengland.org/facilities-planning/planning-for-sport/playing-fields-policy/>
<https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/>
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/>
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/facilities-planning-model/>
<https://www.sportengland.org/facilities-planning/active-design/>

Whilst it seems there is adequate provision for sport and recreation - the County Council recommends further consideration as to how the Neighbourhood Plan can support connections between community facilities - limiting car usage where possible.

The County Council would also draw attention to Sport England surveys: “Active Lives Adult”, which is published twice a year (and replaced the “Active People” Survey) and the “Active Lives Children and Young People”, published annually. Both surveys provide a unique and comprehensive view of how people are getting active, and can be focused at local authority level. The latest adult report is available⁴ and data can be explored and filtered⁵. A summary of the “Active Lives Children and Young People” report is also available⁶.

The latest figures indicate that inactivity significantly impacts on an individual’s physical and mental health, as well as social and community development. Therefore, the Neighbourhood Plan should seek to ensure the provision of a mix of formal and informal areas/spaces (indoor and out) where people can be active, including walking and cycling routes, open spaces and water based activity, as appropriate.

Public Rights of Way (PRoW): The Neighbourhood Plan’s use of the wording ‘Public Rights of Way’ instead of ‘Footpaths’ is welcomed, as this would encompass the different classifications of PRoW.

Policy LE4 Public Rights of Way (PRoW)

PRoW: KCC welcomes the fact that the Parish Council has addressed KCC’s previous comments and included a specific PRoW policy within the revised Neighbourhood Plan. The inclusion of a PRoW Policy is strongly supported. The reference to the Rights of Way Improvement Plan within the supporting text is also welcomed. As a minor comment, KCC requests that policy text is revised to help protect and improve the PRoW network. Suggested wording is:

“New development must preserve existing PRoW, rerouted where appropriate. Where new housing or commercial development affects an existing PRoW, it must be preserved, enhanced and maintained. New PRoW should be created, where appropriate, to increase connectivity for non-motorised users. Funding to be provided by CIL/Section 106 contributions. Planning applications that would adversely affect the existing PRoW network will not be permitted.”

Within the supporting text for this PRoW section, it is requested that additional text is inserted into the plan, stipulating that:

“applicants for new developments should engage with the KCC PROW and Access Service at the earliest opportunity. This would allow the County Council to review proposals for access improvements and consider appropriate developer contributions for PRoW network

⁴ <https://www.sportengland.org/activelivesapr20>

⁵ [Active Lives Online tool](#)

⁶ <https://www.sportengland.org/news/active-lives-children-and-young-people-survey-academic-year-201819-report-published>

enhancements, which would ensure there are sustainable transport choices available that provide realistic alternatives to short distance car journeys. Planning applications should also highlight existing PRow on their plans, showing how paths will be positively accommodated within new development sites”.

Policy LE5 Trees, Woodland and Hedgerow

Biodiversity: The first part of this policy compliments the ‘mitigation hierarchy’ (British Standard 42020), which obliges developers to maintain habitats on-site. However, KCC recommends that the mitigation hierarchy is specifically referenced.

Hedgerows are vital in limiting habitat fragmentation and, as such, KCC recommends that ‘habitat/ecological connectivity’ should be incorporated into this policy. Ideally, there should be no artificial barrier/a break in continuous vegetated areas. Ensuring ‘green corridors’ are included compliments other policies within this plan, such as policy LE7.

Policy LE6 Ecological and Arboricultural Site Surveys

Biodiversity: The County Council is generally supportive of this policy – however would raise a query regarding the last sentence. With the impending mandatory *measurable* biodiversity net-gain, habitat creation in *addition* to habitat retention is likely to be major feature of large developments going forward. For example, encouraging developers to create wildflower meadow grassland (unlikely to be present in the first place as this is a rare habitat) will be vital in restoring biodiversity and, therefore, improving ecosystem services (agricultural output in this case).

Policy LE7 Protection of Habitats Adjacent to Development / Policy LE8 On-going Environmental Maintenance

Biodiversity: The County Council supports these two policies. It is useful to reference Local Wildlife Sites, which have been listed within the plan, as well as Ancient Woodland.

Policy LE9 Features to Encourage Wildlife.

Biodiversity: Ideally, a development’s landscaping should include *native* species only, to provide habitat opportunity for invertebrates, which are the faunal basis for all ecosystems. Non-native plants rarely support invertebrate communities. Implementing native species-only landscaping (especially native wildflower meadow) is the most significant measure a developer can take to enhance biodiversity. Therefore, KCC is supportive of this policy, which specifically references the inclusion of *native* species and wildflowers.

However, KCC highlights that with mandatory biodiversity net-gain expected to be embedded in legislation, developers will have to *measurably* enhance biodiversity. As such, KCC advises that the policy wording be strengthened to reflect this, with an example being: “*Development proposals resulting in a negative impact on biodiversity will not be supported*

unless clear biodiversity gains can be demonstrated. Biodiversity net gain should be determined by applying the Defra's Biodiversity Metric 2.0 calculator."

Minerals and waste: The County Council, as Minerals and Waste Planning Authority, recommends reference to minerals (land-won) and minerals/waste infrastructure safeguarding as set out by the policies (CSM 5, CSM 7 and CSW 16) of the adopted (and recently partially reviewed) Kent Minerals and Waste Local Plan 2013-30. This is an omission, as the area has the following safeguarded land-won minerals:

Superficial deposits - Sub-Alluvial River Terrace (sands and gravels)

Crustal deposits - Sandstone Tunbridge Wells Sand Formation and Ashdown Formation (sandstone)

There is no safeguarded waste management infrastructure within the Neighbourhood Plan area.

The 'Housing Supply and Trajectory Topic Paper for Draft Local Plan-Regulation 18 Consultation, 29 May 2020' that supports the Tunbridge Wells Borough Council's draft Local Plan 2019 suggests that the four proposed allocations in the Neighbourhood Plan are in addition to those listed in this supporting document to the draft Local Plan.

Two sites (LS16 and 277) are not coincident with any of the above safeguarded minerals detailed in the Plan area. Proposed sites LS41 and 424/LS40b are coincident with the sandstone-Tunbridge Wells Sand Formation. The Neighbourhood Plan must consider the safeguarding implications of these minerals for these proposed sites and a Minerals Assessment for these proposed sites will be required. If these sites are to be considered by the Local Plan, it could be reasonable to assume this mineral safeguarding matter is to be deferred to the Local Plan. However, the supporting evidence from the Neighbourhood Plan appears to demonstrate that this is not the case.

The mineral in question is a massive crustal unit that occurs very significantly over the entire Tunbridge Wells Borough area. The County Council's Kent Minerals and Waste Local Plan - Safeguarding Supplementary Planning Document, which is currently being revised, provides detail on this mineral which has been used as a local building stone in the past⁷.

The County Council acknowledges that proposed sites LS41 and 424/LS40b are likely to have little to no impact on the possible future supply of this mineral in Kent. However, for completeness, the Neighbourhood Plan should identify this constraint and provide necessary evidence that an exemption from the presumption to safeguard is justified (using the appropriate exemption criteria of Policy DM 7: Safeguarding Mineral Resources of the KMWLP 2013-30).

Chapter 3 Design and the Built Environment

Policy BD2 General Appearance

⁷ <https://kccconsultations.inconsult.uk/consult.ti/MineralsandWasteSPD/consultationHome>

Heritage Conservation: The draft policy states that materials should be used that are similar in appearance to those used in Beneden's historic buildings. The County Council is generally supportive of this requirement but would note that this may be dependent on such materials being available in the form of building stone, tiles etc. KCC would recommend that a further text should be added to state that development proposals will not be accepted that lead to the destruction of natural resources needed as traditional building materials.

Chapter 5 Transport and Infrastructure

Policy T2 Improving road safety and the impact of traffic

PRoW: It is noted that this policy has been strengthened following previous KCC commentary, requesting that developers submit traffic impact studies in support of their applications and contribute towards mitigation measures where negative impacts on Non-Motorised Users (NMU) are identified. This revised text is welcomed.

Policy T4 Renewable Energy and Low-emission Technology

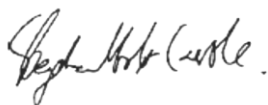
Sustainable Business and Communities: The County Council welcomes consideration of climate change within the Neighbourhood Plan and the need for renewable energy and low emissions technology.

The Energy and Low Emissions Strategy (ELES) outlines Kent and Medway's ambition to reduce greenhouse gas emissions to net-zero emissions by 2050. Taking an evidence based approach, it identifies a pathway to reduce greenhouse gas emissions, eliminate poor air quality, reduce fuel poverty, and promote the development of an affordable, clean and secure energy supply for this county. The County Council encourages the inclusion of the ELES within the Neighbourhood Plan.

The County Council recommends reference to the KCC target of net-zero greenhouse gas emissions by 2050 as set out in the ELES. The Neighbourhood Plan should seek to commit to this target.

KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours faithfully,



Stephanie Holt-Castle

Interim Director – Environment, Planning and Enforcement

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Lamberhurst NDP,
 Planning Policy,
 Planning Services,
 Tunbridge Wells Borough Council,
 Royal Tunbridge Wells,
 Kent TN1 1RS

BY EMAIL ONLY

Environment, Planning and Enforcement

Invicta House
 County Hall
 MAIDSTONE
 Kent ME14 1XX

Phone: 03000 415673
 Ask for: Francesca Potter
 Email: Francesca.Potter@kent.gov.uk

11 December 2020

Dear Sir/Madam,

Re: Lamberhurst Parish Neighbourhood Development Plan 2016-2036

Thank you for consulting Kent County Council (KCC) on the Lamberhurst Parish Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the Neighbourhood Plan.

Parish Vision

The County Council welcomes the amendments made to the Parish Vision, which now includes reference to PRow.

Chapter 7 Landscape and Environment

The County Council, as Minerals and Waste Planning Authority, recommends that reference is made to minerals (land-won) or minerals/waste infrastructure safeguarding, as set out by the policies CSM 5, CSM 7 and CSW 16 of the Kent Minerals and Waste Local Plan 2013-30. The Neighbourhood Plan area has the following safeguarded land-won minerals:

Superficial deposits - Sub-Alluvial River Terrace (sands and gravels)
 Crustal deposits - Sandstone Tunbridge Wells Sand Formation, Ardingly Sandstone and Ashdown Formation (sandstone)

There is no safeguarded waste management infrastructure within the Neighbourhood Plan area.

As the Neighbourhood Plan does not propose any additional allocations further to those proposed in the emerging Tunbridge Wells Local Plan, mineral safeguarding considerations can be deferred to the Local Plan. However, the existence of safeguarded minerals should be referred to within the Neighbourhood Plan as an important consideration for an understanding of the area.

Policy L4: Biodiversity

The County Council is generally supportive of this policy, but would suggest the following amendment to the policy wording:

“Utilise all opportunities to protect and enhance ~~natural~~ habitats and encourage biodiversity ~~the bio-diversity of flora and fauna~~. Development proposals must utilise all available opportunities to protect and enhance natural habitats and encourage the biodiversity ~~of flora and fauna~~, in particular where the site includes....”.

‘Flora and fauna’ has been deleted, as it means the same as ‘biodiversity’.

“Any development proposals ~~should~~ will incorporate additional benefits ~~of enhancing for biodiversity through drainage provision~~.”.

As developments are already obliged to provide biodiversity net-gain and will soon be required to demonstrate *measurable* biodiversity net-gain, the phrasing regarding biodiversity enhancements should be stronger, and include reference to ‘biodiversity net-gain’.

“Where opportunities arise from development, the preparation of management plans to conserve and enhance important habitats in the parish will be encouraged.”

The County Council recommends that the wording of this sentence is strengthened as, for large developments, it is vital that developers commit to management of habitats/greenspaces (especially true for wildflower grassland which requires very specific, if minimal, long-term management prescriptions).

Habitat fragmentation is one of the biggest threats to biodiversity so ‘green corridors’ and maintaining/enhancing ecological connectivity should also be referenced in this policy.

Public Rights of Way

The revised text and reference to the KCC Rights of Way Improvement Plan is welcomed and supported. (*The text should read ‘Ordnance’ Survey maps, not ‘ordinance’*).

Policy L6: Public Rights of Way

The inclusion of this specific Public Rights of Way Policy and reference to the KCC Rights of Way Improvement Plan is welcomed.

The wording of the 'Policy Objective' has been amended to reflect KCC's previous comments, however, greater clarity should be provided to ensure the objective of this policy is clear. For avoidance of doubt, it is recommended that the fourth paragraph is revised with suggested rewording below:

“Applications for new development must demonstrate how the PRow network will be positively accommodated within the site layout. Planning applications that would adversely affect the existing PRow network will not be permitted”.

Chapter 8 Community and wellbeing

Policy C1: Assets of value to the community

The County Council draws attention to the Sport England Active Design Guide, which should be considered for further guidance on active design¹.

The County Council welcomes reference to new and improved footpaths linking community facilities. The County Council is keen to ensure that the Neighbourhood Plan considers how to link more facilities within the area, to limit car usage where possible.

It is clear that community and leisure has been considered as part of this Plan, with the potential for a new Memorial Hall being proposed. This community facility should seek to encourage new activity groups and organisations in the community. The County Council would draw attention to the opportunity to put a small pot of funding aside as a Kickstarter grants fund to get some of these new groups off the ground

The County Council is pleased to see the insightful feedback from the residents, especially around youth activity. The County Council draws attention to a scheme funded by Sport England to support and finance the delivery of Satellite clubs for young people that you may wish to make use of².

Policy C3: Developer contributions

KCC, as Waste Management Authority, is actively seeking developer contributions to support essential waste projects to increase capacity at its network of waste facilities i.e. Waste Transfer Stations (WTSs) and Household Waste Recycling Centres (HWRCs). As such, KCC welcomes the inclusion of waste as an example of services that are referenced in Policy C3.

The PRow reference within this Policy is welcomed and supported.

¹ <https://www.sportengland.org/facilities-planning/active-design/>

² <https://www.kentsport.org/make-sport-happen/sport-in-education/satellite-clubs/>

Chapter 9 Housing and Design

It should be noted that much of Kent has historically had a dispersed settlement pattern. Development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. Historic England, KCC and Kent Downs AONB have published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character. This should at least be referred to in the evidence base.³

Policy D1: Design of new development

Birds such as House Martins cannot nest, and bats cannot roost, within new builds, mainly due to the modern materials used. The County Council recommends that the use of natural, or 'traditional', materials (such as traditional roof felt to prevent bat entanglement) should be incorporated where possible.

The County Council recommends that there should be a focus on native trees where possible. Non-native species, such as laurel hedging, provide little or no biodiversity value. Ideally, all species within a development's landscaping where possible should be native to support invertebrate communities. Non-native plants rarely support invertebrate communities. Implementing native species-only landscaping (especially native wildflower meadow) is the most significant measure a developer can take to enhance biodiversity. Therefore, KCC would be supportive of a policy, which specifically references the inclusion of *native* species and wildflowers.

The County Council recommends that the bird and bat boxes should be integrated into the building. Integrated bird/bat boxes are much more likely to remain in situ compared to mounted boxes within new developments.

Policy D2: Boundary treatments

One of the biggest barriers to small terrestrial wildlife, such as hedgehogs and reptiles, are impenetrable boundaries, such as closeboard fencing. Therefore, provision in boundaries to allow the mobility of wildlife should be included in this policy.

Boundary treatments should ensure habitat connectivity is maintained, as well as enhancing biodiversity. The County Council supports the reference to 'native species' and would highlight that all vegetated boundaries should consist of native species only.

Policy D3: Climate change

The County Council welcomes the consideration of climate change throughout the Neighbourhood Plan and the desire to reduce energy usage and therefore carbon emissions.

³ <http://www.highweald.org/downloads/publications/land-management-guidance/historic-farmsteads.html>

A target of net-zero greenhouse gas emissions by 2050 has been set in the Kent and Medway Energy and Low Emissions Strategy (ELES). KCC would encourage the Neighbourhood Plan to reference and commit to this target within the Neighbourhood Plan.

Taking an evidence based approach, the ELES identifies a pathway to reduce greenhouse gas emissions, eliminate poor air quality, reduce fuel poverty, and promote the development of an affordable, clean and secure energy supply for this county.

Policy D6: Historic environment

It must be noted that archaeological notification areas (ANA) should **not** be listed as heritage assets. They were created by KCC and are simply a means by which Tunbridge Wells Borough Council is notified as to which planning applications KCC Heritage Conservation wishes to be consulted on. The ANAs should therefore be removed from this list.

Policy D7: Conservation areas – Evidence and Support Information

KCC would suggest that both the Kent Historic Environment Record and the National Heritage List for England be identified as key evidence bases for this section.

The text should also mention that the landscapes surrounding both Bayham Abbey and Scotney Castle are designated as Registered Parks and Gardens by Historic England.

The list of ‘Local Heritage Assets’ is incongruous in its current form. It is incomplete as there are many other heritage assets in the parish. In addition, Tunbridge Wells Borough Council is producing a formal list of Local Heritage Assets but none of the sites listed in this section are actually on it as they have yet to compile it. The current text should therefore be altered accordingly. The County Council recommends the following wording:

“In addition to the designated heritage assets, Lamberhurst contains numerous local heritage assets that contribute to the historic character of the parish. Among these are...”

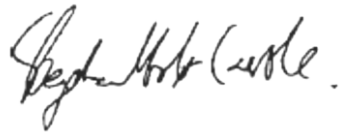
It should also be noted that heritage assets, whether designated or non-designated, are often part of wider complexes than can be seen today. For example, iron mills such as Furnace Mill are part of an industrial landscape that includes the mill site itself but also millponds, mill leats, slag heaps, accommodation, woodlands and tracks. It is important when considering the impact of development proposals on heritage assets that the integrity of these landscapes is maintained, and that consideration is not only given to visible features.

Appendix 4 – Planning context

The County Council welcomes the inclusion of ROWIP within this section, however there is a textual error. This wording should read “Rights of Way Improvement Plan” as opposed to Implementation plan.

KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Stephanie Holt-Castle'.

Stephanie Holt-Castle
Interim Director – Environment, Planning and Enforcement

Kent County Council Response to Emerging Local Plan Partial Review, Site Allocations and Development Management Policies (Regulation 18 - Stage 2) Consultation

Question 1: What services and infrastructure would you want to see delivered to meet the needs of an expanding population and an ageing population, and where?

For the Local Plan Partial Review to be successful in meeting the needs of an expanding and ageing population, allocated sites will need to be planned and designed to provide a diverse range of services. This will need to include all infrastructure and service provision that the County Council is responsible for - the County Council supports an “Infrastructure First” approach to development to ensure that infrastructure is planned, funded and delivered at the right time and ahead of residential development where necessary. New communities will need to be resilient to future challenges, including climate and ecological emergency and business continuity risks. It will also be important for growth to be increasingly zero carbon, and the Local Plan should seek to enable and promote the adoption of zero carbon behaviours.

The County Council encourages the importance of the Local Plan review process to focus on a place-making approach that puts infrastructure first. This will ensure that planned residential and commercial growth will deliver high quality and sustainable developments and provide opportunities for local people. This “Infrastructure First” approach is embedded in the Kent and Medway Infrastructure Proposition, a deal with Government for new infrastructure investment that will enable accelerated housing delivery, which is focussed on building the right homes in the right places and providing the public services, transport infrastructure, jobs and homes that residents will need now and in the future.

Commitment to close collaboration between key partners will be essential to ensure that growth is planned, funded and delivered in a timely manner. The County Council will look to continue to work closely with the Borough Council to ensure that full infrastructure funding is available to enable the delivery of the necessary infrastructure to support new development at the right time.

Highways and Transportation: The County Council, as Local Highway Authority, would request that opportunities are made available for sustainable transport across the Borough. It is so important for public transport facilities to be factored into growth scenarios, to cater for existing and future residents – particularly as the increasingly older population may be more reliant on public transport to access key services and for social interaction.

It is imperative that the Borough Council continues to build upon the proposed improvements to public transport facilities (such as the Garrick Street hub and improvements to Rathmore Road) and walking and cycling infrastructure (such as the new cycle route between the town centre and the cyclopark). Highways and transport improvements should maximise opportunities for sustainable travel and reduce the impacts on the local highway network.

Public Rights of Way (PRoW): A convenient, accessible and reliable transport network will be vital for new development to be successful in meeting an expanding population. Providing infrastructure that encourages a modal transport shift towards walking and cycling should be an important consideration in planning for growth. Active travel considerations will help to reduce vehicle congestion on roads, alleviate air quality issues and improve health and well-being.

Provision and Delivery of County Council Community Services: Community facilities will need to be planned and delivered to ensure residents are able to access local services as required – to include the range of KCC provided services. The location and multifunctionality

of community services is best considered from the outset to assist in the delivery of sustainable and robust communities.

The provision of KCC's Community Services will be integral to the delivery of sustainable communities – and, through collaboration with the County Council, the Local Plan must therefore fully factor this into its growth strategy – to include how and when they the necessary infrastructure and services be delivered as part of growth and to ensure that adequate funding for this provision will be provided via developer contributions. The following KCC services will all need to be factored into planning for meeting the needs of a growing population:

- As the Local Education Authority, the County Council has a duty to ensure provision of sufficient primary and secondary pupil spaces at an appropriate time and location to meet its statutory obligation under the Education Act 1996 and as the Strategic Commissioner of Education provision in the County under the Education Act 2011. The Local Plan must ensure that the growth strategy factors in the delivery of and funding for sufficient pupil places at the right time and in the right location (question 28 provides further information on education pressures and requirements).
- The County Council is also responsible for ensuring the provision for Community Learning (formerly known as adult education) and Early Help for young people (from birth to 25 years old). Early Help duties include the delivery and commissioning of children's centre services, other specialist children's services and youth services.
- KCC has a duty to ensure early years childcare provision in Kent, as set out in the Childcare Acts 2006 and 2016.
- The County Council has adult social care responsibilities delivered through the Kent Accommodation Strategy for Adult Social Care to ensure adequate facilities for older persons in the County (KCC's response to question 8 in particular sets out factors that will need to be captured in the Local Plan).
- The County Council is the statutory library authority responsible for providing a comprehensive and efficient library service for everyone working, living or studying in the area (KCC's response to question 27 sets out specific considerations and pressures relating to library provision that will need to be captured in the Local Plan)

Public Health and Prevention: The provision of community meeting spaces in suitable settings for community groups (such as youth groups) as well as community development work (such as addressing health inequalities via the wider determinants of health e.g. Healthy Living Centres) will be important. Access to active travel and open access to green and blue spaces will be important factors for improving both mental and physical health, with consideration to be given to lighting and other facilities to encourage the use of public spaces. Ideally there would be space for public health services to operate from. This might include consulting rooms for smoking cessation, larger rooms for health visiting services and space for outreach sexual health and other services.

Broadband Connectivity: Digital connectivity is of critical importance for the both local residents and for the local workforce, but it is recognised that there can be a visual impact from associated infrastructure. A balance will need to be struck to ensure the necessary digital infrastructure is available to those who live and work in Gravesham.

Sustainable Urban Drainage Systems: The County Council, as Lead Local Flood Authority, would like to see multifunctional blue and green infrastructure delivered that can offer a wealth of benefits and opportunities for the environment and communities.

Sports and Recreation: The County Council's [Active Lives research](#) shows that a person is far more likely to be inactive the older they get. The Chief Medical Officer defines an inactive person as someone who, over the course of a week, does not achieve a total of 30 moderate intensity equivalent minutes of physical activity. Only 18% of 16-34-year-olds are inactive, but this figure rises to 27% of 55-74-year-olds and 49% of over 75s. Those who are least active stand to benefit the most by getting active when it comes to their health and happiness.

The situation is exacerbated by an ageing population – so it is important to invest now to help change behaviours. Older people and people with long term health conditions are a primary demographic for Kent Sport and Sport England. Whilst getting active can be challenging, and lapsing and re-lapsing is common, there should not be an assumption that older adults cannot be active, so work is required to break down these stereotypes. Encouraging older adults to be more involved in sport and activity is crucial and will help ensure that the Sport England vision to ensure that everyone in England, regardless of age, background or ability, feels able to take part in sport or physical activity, is achieved across the Borough.

Given the responsibilities of the County Council for vital community services, KCC would welcome continued engagement with the Borough Council as growth options for the Borough are developed through the Local Plan process, to ensure that all infrastructure and services provided by the County Council are fully captured in the emerging Local Plan.

Question 2: Do you agree with retaining the current Local Plan Core Strategy Vision? (Please explain your answer by providing additional detail where possible)

The current Local Plan Core Strategy Vision focuses on (amongst other things) regenerating Gravesham into an area that offers a diverse range of housing and employment opportunities and which respects the built, historic and natural environment. The County Council has no objection to it being retained.

Question 3: Do you agree with retaining the current Local Plan Core Strategy Strategic Objectives with minor amendments? (Please explain your answer by providing additional detail where possible)

The County Council generally agrees with retaining the current Local Plan Core Strategy Strategic Objectives, with the minor proposed amendments relating to Ebbsfleet Central and town centres to reflect changes and progress since the Core Strategy was originally adopted.

Question 4: What would you improve about the Borough as a place to live, work, shop and undertake leisure activities? (Please explain your answer by providing additional detail where possible)

Sports and recreation: According to the latest Active Lives data 2019/20, which sets out the number of inactive adults (those doing less than 30 minutes activity a week), Gravesham is the worst performing local authority in Kent.

To improve the levels of activity in residents, it is important to improve access to leisure facilities. Local Plan should seek to ensure it enables physical activity– and ensure that there

are formal activity offers for people as well as opportunities for informal activity (cycling, walking, running outside of club structures). It is important to make access easy and part of daily routine.

Question 5: Should the Local Plan Partial Review's housing requirement follow the Government's standard method formula, including taking into account unmet needs from neighbouring authorities?

The County Council recognises that it is the role of the Borough Council in determining local housing requirements, working with neighbouring authorities through the duty to cooperate. KCC would like to be involved in establishing the housing requirement as a key provider of infrastructure and services.

Question 6: If your answer is no, please set out why you think this and what different methodology should be used and why?

N/A

Question 7: The current Housing Market Area boundary (Figure 7) is based on recorded trends. Do you have any evidence to suggest that the Borough's Housing Market Area may have changed since the Strategic Housing and Economic Needs Assessment was undertaken? If you do, or if you disagree with the boundary set out in Figure 7 please state why and provide evidence to support an alternative boundary.

No comments.

Question 8: Should the Borough Council require developers to specifically meet the needs of specific groups such as the elderly? If the answer is yes, how would this be achieved?

The Borough Council should have regard to the Kent Accommodation Strategy for Adult Social Care in determining housing options for adult social care clients, and to ensure that adequate facilities are provided for older persons are captured in Local Plan policy, as necessary.

There is less demand for residential care places for people with medium needs, as people are choosing to stay at home for longer or are selecting other housing options (such as Extra Care) to maximise their independence. However, there is still a requirement for care homes to be provided and they can work effectively with people with challenging dementia. The number of people living with dementia continues to rise, resulting in a need for care homes that can offer nursing level care, given that people are living longer and with more complex medical conditions. The County Council will look to work with the Borough Council to ensure adequate provision of this housing type is considered within the Local Plan. Within this context, developers should then be considering how to meet the needs of specific groups, including the elderly, as they plan development proposals.

The County Council would also draw attention to the need to ensure that there is suitable and sufficient sheltered housing provision across villages within the rural areas.

Question 9: Would you like to see more first homes and homes for older people built across the whole of the Borough?

First Homes: The County Council firmly believes that all Kent residents should have an opportunity to live in good quality affordable housing – whatever their stage of life. First Homes need to be considered as just one element of a wider assessment into local housing need, so that they can then be delivered as part of an informed, evidence based approach that identifies what tenures and types of homes are needed to support and develop balanced local communities and meet residents’ needs. Otherwise, they could potentially limit provision (particularly where there is demonstrated need for a particular tenure) of other types of affordable housing for those with the greatest need.

The County Council is operating in an increasingly challenging environment, and its overriding concern as infrastructure provider is in ensuring that adequate levels of funding are provided from development to support new and existing communities – and that there will not be an overall impact on infrastructure funding resulting from the provision of First Homes.

Homes for older people: The Ministry of Housing, Communities and Local Government (MHCLG) identified in its guidance ‘Housing for older and disabled people’ (June 2019), that the need to provide housing for older and disabled people is critical. Accessible and adaptable housing enables people to live more independently and safely. It provides safe and convenient homes with suitable circulation space and suitable bathrooms and kitchens. In consideration of the County Council’s statutory responsibilities around Social Care, KCC requests these dwellings are built to Building Reg Part M4(2) standard to ensure they remain accessible throughout the lifetime of the occupants to meet any changes in the occupants’ requirements.

The County Council would recommend that the Local Plan should include consideration of dementia friendly design requirements. Small design changes to housing and infrastructure can help someone living with dementia to be more independent, by providing a home and environment that is clearly defined, easy to navigate and feels safe.

Well-designed housing can have long term benefits, including meeting market demand in an area that has a lack of supply, and can also improve health and wellbeing opportunities for residents. High quality design should also be accessible, taking into account the varying needs of the evolving community – and should reference the new Kent Design Guide, which is due to launch in 2021.

Question 10: Should the Borough Council be prescriptive in terms of the mix, size and type of housing that should be delivered in the Borough, or should Borough Council continue to provide flexibility to Developers so that they can respond to changing market demands and economic realities? If the answer is yes, how would this be achieved: a single mix, size and type requirement for all sites or a range of requirements for different categories of site?

The County Council recognises the value that a prescriptive policy approach can have in setting out the mix, size and type of housing because it can help to ensure that the right type of houses are delivered over the plan period across the Borough. Such policy provision is useful for the County Council as it enables an element of forward planning in the nature and extent of KCC services that will be required, but also the potential level of funding through developer contributions that could be generated from the developments.

That said, it is also recognised that allowing a more flexible approach for developers to respond to market demands and economic realities may allow sites to come forward that might be challenging on viability grounds if a stringent housing mix policy is applied. KCC would request that, whichever option is chosen, it is done using a robust evidence base and review of housing needs across the Borough, and with due consideration of the need to enable infrastructure providers to deliver necessary infrastructure to support development.

Question 11: Should the existing approach to density standards in the Borough be changed? If it should, what alternative approaches should be considered?

The County Council recognises that allowing for higher density development in the urban area can be beneficial in enabling growth to be accommodated and directed into an area that has established services and infrastructure in place. However, it can also place a strain on existing infrastructure where there is not always the possibility of mitigation – and this must be avoided. Should the Borough Council look to change the approach to density standards, the County Council would request early engagement, to ensure that the approach will allow for all the necessary KCC infrastructure and service provision – including school spaces, community service provision and highway infrastructure.

Any approach that would allow for an increase in density will also need to be informed by design standards to ensure that a higher density does not compromise on the standards of homes delivered – this could also include space for home working.

The County Council requests that the Local Plan Partial Review makes reference to the emerging Kent Design Guide and its principles to encourage good practice in development. There should be design emphasis on reducing social isolation, as well as crime and fear of crime, through design of safe, inclusive and accessible public spaces and amenity for all.

Question 12: Should higher density development be sought in close proximity to rural train stations (i.e. Higham, Meopham and Sole Street)?

This could be a sustainable option, but it cannot be assumed that location to a train station will make higher density development sustainable. Higher density development, even close to rural train stations, could put further strain on the congested rural network where residents will need to access services that are either not accessible or unlikely to be accessed by rail - this will depend on the services operated and their frequency. This would have further negative impacts on air quality as a result.

Question 13: Should the Borough Council continue to seek up to 30% of new homes as affordable housing in the urban area and up to 35% of new homes as affordable housing in the rural area? What evidence do you have to support your view?

The County Council recognises that the demand for affordable homes is increasing. Affordable housing must be of high quality, in the right location and with the infrastructure to support residents to have a good quality of life. There must also be a range of types and tenures delivered to meet the needs of the community. The proportion of new affordable homes to be required by policy is something for the Borough Council to determine, but the County Council would request that consideration is given to ensure that the delivery of affordable housing does not compromise the level of infrastructure provided to support development – there must be a balance sought between such competing demands on the viability of a project.

The County Council set up an Affordable Housing Select Committee in 2019 to determine whether KCC can play a greater role in maximising the development of affordable housing in Kent. The Select Committee report sets out a range of recommendations, many of which are for KCC to consider, and which would go some way to support the development of genuinely affordable housing for the people of Kent. The County Council will welcome continued engagement with key stakeholders, including the Borough Council.

Question 14: Should the Core Strategy thresholds for the provision of affordable housing be changed? What evidence do you have to support your view?

The County Council would again request that, if altered, any thresholds set will still allow for key infrastructure providers to deliver the necessary infrastructure via developer contributions to support development.

Question 15: Should the Borough Council apply the existing affordable housing requirements to Built to Rent schemes?

No comment.

Question 16: Given the affordability issues in the Borough should a greater mix of sites be identified to boost supply and affordability. With land allocated to also deliver a proportion of the Borough's housing needs on smaller sites?

The County Council's main observation is that when smaller sites come forward for housing, it can be more challenging to fund and deliver the range of services and infrastructure that may be required as a result. The County Council will welcome an opportunity to work with the Borough Council as the evidence base, site selection and viability process for individual sites is progressed to ensure that any policy changes in the mix and size of sites taken forward within the Local Plan Partial Review would not be to the detriment of infrastructure and service provision.

Question 17a: How and where should the needs of Gypsy, Traveller and Travelling Showpeople be met in the Borough? For example, should provision be made as part of land allocated in the rural area for housing?

The Local Plan sets out that the Gypsy and Traveller Accommodation Assessment identifies an increased need in the Borough for Traveller pitches (beyond that previously identified). At this stage, the consultation document does not state how this need would be met. The County Council would advise that any allocated Gypsy and Traveller sites will need to take into account of whether they are in locations that have good local connections (whether in urban or rural areas) and with careful consideration of their integration with existing communities. The County Council's Gypsy and Traveller Service would welcome further engagement on how the Local Plan will seek to meet the needs of the Gypsy, Traveller and Travelling Showpeople in the Borough.

Question 17b: Do you agree with the methodology utilised for the recent GTAA and the household need identified? If you do not, please provide alternative evidence

No comment.

Question 17c: How should the need for travellers who do not meet the Planning Definition be met and those whose need could not be quantified i.e. unknown?

No comment.

Question 18: Should we continue the current approach to protecting existing employment areas? If not, what evidence do you have to support your view?

The County Council agrees with the approach to protect existing employment areas to help ensure there are genuine and sustainable opportunities for employment within the Borough.

Question 19: Should we be allocating more land to meet the Borough's employment needs and to attract greater investment to the Borough, to try to ensure that for every 16-64 year old resident in the Borough there is a job opportunity available?

The County Council recognises that the Local Plan Partial Review seeks to increase the level of employment land in the Borough by fifteen hectares. The County Council notes that the Local Plan Partial Review acknowledges that there are a number of factors which will have an impact on the economy across the country moving forward. The Local Plan will have to be flexible and resilient to be able to adapt to the changing needs of employers as the full impacts of the COVID-19 pandemic and its impact on the local workforce become apparent.

There are likely to be changes in future working patterns as a result of COVID-19 and this will need to be considered alongside changing demands for employment space. The impact of COVID-19, both in the long and short term, should be considered within the Local Plan. Although the long-term impacts are unclear, there may be a shift in the demand for office spaces which could potentially be replaced with demand for shared workspaces and meeting spaces for Small to Medium Enterprises (SMEs), with further demands from entrepreneurs. Shared workspaces and accessible employment locations have the added benefit of reducing the level of commuting out of the local area. The Local Plan should be adaptable to accommodate these changing trends in work patterns, as the long-term influence of COVID-19 becomes apparent.

Suitable spaces for home working should be designed into new development and this will have positive benefits by boosting the resilience of this sector of the local workforce and their ability to continue working.

The rural economy is changing, and the Local Plan should accommodate this sector as it evolves to meet current and future challenges. To develop a vibrant rural economy that is capable of delivering Net Zero, the Local Plan should support the rural economy in delivering and increasing productivity, employment opportunities and food security.

Highways and transportation: The Local Plan should seek to allocate employment sites that reflect future needs of employers, ensuring the promotion of a modal shift towards sustainable transport modes. Businesses, schools, health services and leisure provision all need the support of sustainable transport infrastructure. The County Council, as Local Highway Authority, would welcome further engagement with Gravesham Borough Council to ensure opportunities for sustainable transport are delivered alongside economic and employment growth. Boosting the levels of employment spaces that can be sustainably accessed will have a positive impact reducing the level of out commuting, as well as local congestion on the highway network. Increasing employment space within Gravesham may

encourage in-commuting from neighbouring towns, so it will be important to ensure that employment land is mainly focussed in the urban areas where good public transport services exist, especially between Gravesham and Dartford, to promote and encourage sustainable access, reducing the impact on the highway network.

The economic recovery from COVID-19 and the Local Plan partial review present an opportunity to provide support to the low carbon sector and boost energy efficiency measures. The Local Plan should seek to continue to identify ways to boost support for this sector, with consideration of the current skills gap, to ensure economic and employment benefits during and beyond the COVID-19 recovery.

Question 20: What provisions should be made to promote micro and small businesses in the Borough and to encourage people to work from home?

Given the recent requirement to work from home where possible, the County Council recommends a renewed consideration of the design of homes, which allow for safe and reasonable home working areas. The County Council would recommend that digital infrastructure – including gigabit capable broadband connections (e.g. full fibre) - is promoted as part of sustainable development because this will boost the resilience of the local workforce, allowing them to work flexibly and at home where necessary.

Flexible working opportunities should be offered to ensure spaces can adapt as small and micro businesses evolve. Spaces must be well designed, accessible and with digital infrastructure to ensure they can meet changing needs as required.

Question 21: Should the Local Plan be making provision for greater and better paid job opportunities for all residents and especially lower paid female residents of the Borough?

The County Council would agree that in planning for growth, there should be an expectation that it will help to ensure the provision of the full range of employment space and services to meet residents' needs. Employment space should be well connected to help existing and new residents access local jobs. There should be a range of employment opportunities available for all skills levels.

Question 22: What measures should be undertaken to reduce levels of out commuting?

There is a need to ensure that adequate digital infrastructure is made available to allow for home working, alongside ensuring that new homes should be designed to incorporate suitable home working spaces. By boosting the resilience of the workforce to carry out their roles at home, this will reduce the need to travel, which will have a knock on positive impact on reducing levels of congestion across the Borough during peak hours.

Highways and Transportation: As Local Highway Authority, the County Council considers that to reduce the levels of out of town commuting, the Local Plan should focus on creating high density activity in the town centre, providing opportunities for more people to walk or cycle. For people travelling further afield, the Local Plan should provide a variety of travel options, reducing the impact on the local highway network. High quality employment spaces in accessible locations have the benefit of reducing the levels of out commuting by retaining the workforce within the Borough, with spaces meeting the needs of businesses as well as employees.

Question 23: Should the Borough Council continue to focus retail, leisure and recreation growth towards Gravesend Town Centre, are there any areas of the Borough in need of retail and leisure floorspace to support the local area and sustainability?

The County Council considers that the provision of a mix of retail, leisure and recreation will be essential for the Town Centre to grow and thrive. The investments made in the St George's Shopping Centre, and the further investments outlined in paragraph 1.7.13 of the consultation document, are a really positive step in delivering on this aim.

Question 24: In light of the Government's changes to the Use Class Order and Permitted Development Rights, should the retail core of Gravesend Town Centre be protected, or should it be diversified to encourage a greater range of uses?

Ensuring that the town centre has the flexibility to meet changing demands and shopping patterns is likely to boost the resilience of the Town Centre in the long term. The County Council considers that it is likely that Gravesend Town Centre (along with all town centres) will need to evolve to meet the changing needs of the community and this may include long term changes resulting from a movement towards online retail, and short term shopping and behavioural changes resulting from the COVID-19 pandemic. The County Council would support an evidence-based approach, which captures current trends and behaviours, to determine what approach will be most appropriate to take for the Town Centre.

The County Council will be supportive of Town Centre options that meet the needs of the local community, with facilities which can be accessed sustainably, and would welcome the opportunity to work with the Borough Council to ensure that highway and transportation considerations are taken into account. In assessing any options for diversification in the Town Centre, consideration must be given to ensure all service and infrastructure needs are assessed early on. Community facilities, delivered as multifunctional spaces, are particularly well placed to adapt to meet the changing needs of the community. The County Council supports temporary uses which can provide meanwhile services as they are required, provided the use can operate sustainably.

Permitted development from office to residential development in town centres can sometimes lead to the development of poor quality housing, which does not have access to appropriate community infrastructure and services and results in the loss of employment space within town centres. The County Council would like to see the Local Plan Partial Review have consideration of office to residential permitted development, and how it can be appropriately managed to ensure sustainable growth and adequate employment space within the Borough.

Question 25: Is the Borough Council's revised settlement hierarchy approach suitable? Please provide details.

The County Council understands the revised settlement hierarchy generally reflects the Option B growth strategy presented in the consultation document – to which KCC provides its full comments in question 28

The County Council, as a key infrastructure provider, would reiterate that growth should be focused on areas with existing infrastructure, or where there are opportunities to expand infrastructure and services to support the growth. Within its response to the Regulation 18 Stage 1 consultation, the County Council provided comments on the various growth

strategies put forward and raised the importance of bringing forward adequate infrastructure to support development within the urban area.

The County Council acknowledges the need for expansion of the urban area, which could provide opportunities for sustainable transport and the scope to develop further community infrastructure. Growth in urban expansions can help to enable new residents and the new workforce to take advantage of existing high-quality facilities and infrastructure. Locating development in these locations reduces the need to travel, provides opportunities for a high sustainable mode share and in turn, reduces the impact on the local highway network. Within this consultation, urban expansion continues to feature at the top of the settlement hierarchy as the main area for growth in the Borough. The County Council notes that (under Option B) the proposal for urban expansion on land at Chapter Farm (to the west of Strood) for 1,385 dwellings remains, with expansion to the east of Gravesend is now reduced to a smaller number of sites.

Regulation 18 Stage 1 consultation also proposed the expansion of second tier settlements, including Istead Rise, Hook Green Meopham and Higham. The County Council notes that this consultation is looking (under Option B) to consider expansions around Higham (including Lower Higham), Meopham (including Hook Green and Meopham Green) and Istead Rise (all being proposed as “Large Villages” in the revised Settlement Hierarchy). The County Council acknowledges the need for expansion of these settlements to provide the critical mass to deliver the necessary infrastructure to support sustainable development.

The County Council previously raised concerns about including dispersed developments as part of the growth strategy, especially in the third and fourth tier settlements, due to their ability to deliver sustainable growth. The County Council is therefore pleased to see that medium and small villages are not the main focus for growth, but are instead recognised as being suitable for limited development and residential infill (for medium villages) or infill only (for small villages) only. The County Council would however request clarification on what ‘limited development’ entails – and would emphasise that it must be only small scale development that will not have any tangible or significant impact in respect of increased vehicle movements.

Question 26: Are we right not to consider how the changes in technology impact of the sustainability of rural settlements? Or should we update how we assess settlement sustainability?

Changes in technology and behaviours could have an impact on the sustainability of settlements, as well as behavioural changes that have taken place in response to the COVID-19 pandemic. The role that technology has played in enabling a shift to work at home, the rise of online shopping and online leisure activities could be important in assessing how technology has, and could, shape settlement sustainability.

Changes in technology and behaviour also apply to travel and it should be recognised that the younger generation in particular is shifting towards using more sustainable modes of travel and engaging in a sharing economy (such as public transport, car share, Uber and car clubs). There would be a need for significant levels of infrastructure across rural settlements to support this level of technology, as well as investment, to deliver this. Moreover, there is still likely to be a reliance on private vehicles within rural settlements, regardless of any such advancements, which would have a cumulative impact on the network, particularly in congested areas and rural areas where the existing carriageways may not be suitable for increased levels of traffic.

Question 27: Should the housing requirement for the Borough be broken down so we can understand the specific individual housing need requirements for the urban area, parishes and Istead Rise?

It is understood that this question relates to whether an alternative approach could be to meet housing need for specific areas within the Borough rather than for the Borough as a whole. The County Council defers to the Borough Council on the suitability of this approach. As an infrastructure provider, the County Council is concerned with the delivery of sustainable development supported by adequate infrastructure. Therefore, the County Council would be keen to engage with the Borough Council further if this approach is to be progressed to ensure that the specific housing requirements identified, can be supported by relevant infrastructure.

Question 28: Which redistribution approach do you consider to be the most effective (A, B, C or D)? Are there any alternative approaches that should be considered?

KCC notes that the four growth options put forward under this consultation look to deliver the growth required beyond that already set out in the Local Plan Core Strategy. As a key infrastructure provider, the main consideration for KCC in considering these four options is to ensure that any selected growth strategy will enable growth to be supported by the necessary infrastructure, at the right time.

Any infrastructure improvements or new facilities and services required as a result of growth within the Borough must be wholly funded through developer contributions. It will be essential for the funding mechanisms required for infrastructure requirements to be established at the outset, and this must underpin the assessment of growth options, to ensure that prospective site allocations are genuinely viable and deliverable. The County Council would welcome discussions with the Borough Council on the chosen growth strategy at the earliest opportunity to ensure the necessary infrastructure is planned for, funded and delivered in a timely manner and ahead of residential growth where required.

The County Council generally favours growth strategies that include sustainable larger development sites, as they are more capable of supporting new infrastructure. When a more dispersed growth strategy is proposed, it is often more challenging to ensure that the right community facilities are brought forward to support these smaller development sites. However, KCC notes that the consultation document indicates that a location for a freestanding settlement has not been identified. KCC notes that reference is made in the document to the only reasonable location (being to the east of Istead Rise and north of Meopham) is not being progressed due to landscape and Green Belt impacts.

It is also noted land to the east of Gravesend has been removed, as the land is unlikely to be available under this plan period, due to it being required for the construction of the Lower Thames Crossing and mitigation once the crossing is opened. The County Council notes, however, that the land between Thong Lane and the alignment for the Lower Thames Crossing will be safeguarded for development beyond 2030 and for a future Local Plan.

If the Development Consent Order is granted for the Lower Thames Crossing, it is likely to have a significant impact on the surrounding communities - both during the construction and operational phases of development. There will be notable impacts on the existing highway network as well as environmental impacts (including air quality) resulting from the development. The County Council is engaged with Highways England and the Planning Inspectorate on this scheme and has requested that further environmental information is provided to fully understand the environmental impacts, stressing the need for this piece of infrastructure to be fit for the future.

The challenge of balancing the pressure of growth against the impacts on the environment and health is now more important than ever before. Road transport emissions are a significant source of both carbon emissions and the main cause for poor air quality across Kent and Medway. The County Council would therefore remain cautious regarding the impact in which the Lower Thames Crossing may have on the surrounding communities until further information has been provided by Highways England.

Any growth strategy for Gravesham should have consideration of the Kent and Medway Energy and Low Emissions Strategy (ELES). The ELES sets out how KCC in partnership with Medway Council and district authorities, will respond to the UK climate emergency and drive clean, resilient economic recovery across the county. Key priority actions, which should be considered within this Local Plan Review, include promoting the development of an affordable, clean and secure energy supply for the county, reducing greenhouse gas emissions, eliminating poor air quality and reducing fuel poverty.

The County Council, as Local Highway Authority, considers that each of the four options proposed provide opportunities, but also create challenges, for the delivery of necessary infrastructure to support sustainable travel opportunities. At present, 38% of the Borough's greenhouse gases arise from transport. It is therefore imperative that sustainable transport options are fully explored for any growth strategy in order for the targets set out under the Borough's Climate Emergency declaration to be realised – and they should also take into account the ELES. This includes the provision of walking, cycling and public transport facilities, as well as new technologies and innovations.

Option A: a proportionate distribution based on the scale of existing areas

It is understood that Option A would proportionately distribute growth based on the scale of the existing housing stock in rural areas; this would range from Vigo taking 9% growth to Istead Rise taking 17% growth. Whilst this approach would direct most development to large rural settlements, which are likely to be better served by services and facilities, it does not take into account the range of other factors such as distance to jobs, facilities, location or public transport. There is concern that this option could therefore result in unsustainable growth and put pressure on existing services, reliance on the private car and pressure on existing roads as a result of growth in a number of settlements across the Borough. Taking quite a formulaic approach like this would make it more challenging to properly take into account spatial and locational considerations. This approach is also likely to lead to dispersed and piecemeal development, which is unlikely to deliver the infrastructure required to support growth.

Option B: Local Plan Core Strategy Partial Review and Site Allocations document allocations

It is understood that Option B would distribute housing around Gravesham, at Chapter Farm (adjacent to Strood) and Large Villages at Istead Rise, Meopham (Hook Green and Meopham Green) and Higham (including Lower Higham).

Highways and Transportation: In terms of highway capacity, KCC recognises that there are areas in the Borough that will require highway improvements in order to mitigate the impacts of the developments. These areas will be identified through highway capacity modelling at the next stage of the Local Plan process, once the KCC model is available for use. It is recognised that parts of the Borough within the urban and rural areas suffer from congestion on the highway. This is a major concern for KCC and will need to be addressed.

Land at Chapter Farm (the large development site to the west of Strood) potentially benefits from good access to the A289 Wainscott bypass and onwards to the A2, as well as rail connections within Medway. KCC would recommend discussions take place with Medway Council as the neighbouring highway authority for this proposed site allocation.

All the sites located in the “Large Villages” category of the revised settlement hierarchy will need to be well connected to the existing transport network and where relevant, connected in transport terms to adjacent communities, avoiding isolated pockets. The capacity of the railway (both on the trains and on the platforms) should be assessed to ensure they can cater for the increased demand.

The proposals for larger pockets of development in the rural areas are in locations where bus services and sustainable connections to surrounding destinations are currently limited. Where there is public transport, it is not necessarily providing a service that can be relied upon in place of the private car, due to the infrequency of the bus service (i.e. one bus an hour/ limited evening services/ no buses on Sundays). Whilst the increased demand may in some areas bolster the existing rural bus services, the existing services are often infrequent and the quantum of development proposed may not be sufficient to provide the level of infrastructure required to support the new development.

Sites put forward in the Local Plan will need to have appropriate pedestrian, cycle and public transport access between them and key destinations in order to ensure sustainable travel is a viable option. The County Council draws attention to the fact that some of the sites may be located in areas where realistic walking and cycling distances are not achievable.

Dispersing development across these smaller settlements, which are a distance from the main urban area of Gravesend and beyond walking distances from services, would mean that cycle route and local bus services improvements would still be necessary to promote sustainable travel. The main concern is that if the critical mass to support investment in transport infrastructure is not reached, there would be a reliance on the private car for access to key services. Moreover, where train services are limited, such as in Meopham Station, this may result in residents choosing to travel by private vehicle to their destination, thereby increasing the use of unsustainable travel.

It will be essential to ensure that for any housing allocations located in the rural area, parking provision is factored into the masterplanning or site design of all schemes to prevent any inappropriate vehicle parking overspill into surrounding rural roads and villages. The County Council would welcome discussion on establishing the appropriate parking standards. Moreover, during construction phases for new developments, construction traffic and associated parking can have a negative impact on local rural communities if effective strategies are not agreed and implemented from the outset. It will be crucial for Construction Management Plans to be developed and agreed with the Local Highway Authority to establish suitable routes and mitigation to reduce the impacts of construction on local communities.

The Vigo/Culverstone Green area for growth put forward under the previous consultation was less favourable in transport terms. The County Council therefore welcomes the removal of that element.

Education: As Education Authority, the County Council notes that the overall housing requirement would indicate a need to create a new eight form entry secondary school and four new two form entry primary schools across the Borough. The delivery, funding and location for this provision will need to be planned for into the Local Plan growth strategy.

Fewer, but larger, developments would make the provision of new schools sustainably. There is some capacity in a few of the existing schools across Gravesham, including within the urban area, however, nearly all school expansion options have now been deployed. The wide dispersal and rurality of development spread across the Borough will result in the challenge of finding sites that are near enough to the developments to prevent a significant increase in road traffic due to children travelling to their schools.

Provision and Delivery of County Council Community Services: KCC generally supports the location of higher density development in the urban areas, as this will enable new residents to take advantage of existing high-quality infrastructure and will provide economies of scale sufficient to expand this infrastructure.

It will be important to factor in land availability for the provision of necessary infrastructure. The County Council anticipates that land availability could be especially difficult along the riverside and north of the M2 where land will be at a premium or simply unavailable. There must be suitable land available for the delivery of community infrastructure within close proximity to growth to ensure these facilities can be accessed sustainably.

The development of the site at Chapter Farm would result in a large proportion of residents using services and facilities in Strood and the Sustainability Appraisal confirms this. The County Council would therefore recommend early conversations with Medway Council to ensure that the necessary infrastructure capacity is factored in.

A benefit of expanding the second tier settlements of Istead Rise, Meopham (Hook Green and Meopham Green) and Higham (including Lower Higham) is that housing could potentially be delivered at a scale to enable some new infrastructure to be supported and would allow for greater use of rural bus services and struggling local services. It will be critical for there to be a realistic prospect to create or sustain infrastructure and services to meet demand, to avoid significant pressure on existing facilities and infrastructure.

Option C: Improving settlement sustainability

It is understood that this option would direct development towards settlements that are classed as less sustainable locations due to the limited provision of local services and employment opportunities. The intention would be to improve their sustainability through broadband – including 4G, new service provision and the use of virtual access to services and employment.

The Sustainability Appraisal sets out that the areas that would receive most growth under this option would be those in the lower two levels of the existing settlement hierarchy – including Cobham, Shorne, Sole Street, Harvel, Lower Higham, Luddesdown, Lower Shorne, Shorne Ridgeway and Three Crutches.

This option could improve and enhance services and reduce the need for people to travel to other settlements to access services. It is not clear how it would work in practice – particularly in respect of viability, as developments would potentially have to generate larger sums of money through developer contributions to deliver the additional infrastructure and services required. Moreover, often large-scale growth is required to fund the delivery of significant infrastructure improvements that would succeed in boosting the sustainably credentials of an area.

The County Council would therefore oppose this option – raising uncertainty as to whether such an option would deliver sustainable development (certainly in the immediate term) and could actually have the opposite effect, with a detrimental impact on congestion and private car use.

The County Council would urge the need for early engagement with the Borough Council if this option is to be progressed to further understand the aims and aspirations of this strategy, to allow KCC reasonable opportunity to respond with its thoughts on this approach.

Option D: A mixture of the above

It is not clear what this option would look like in practice i.e. its success would very much depend on the selected site allocation locations, how they are distributed and which elements of each of the three growth strategy options would be taken forward. The County Council would request a discussion at the earliest opportunity to discuss this in more depth, to understand the implications for funding and delivery of infrastructure and services that would be required if this option is taken forward.

Question 29: Do you support the formation of Neighbourhood plans, should the council encourage their establishment by local communities? If yes should the council actively help with this?

The County Council considers that Neighbourhood Plans are important in ensuring new development is rooted in local distinctiveness, and in offering opportunities for local residents to shape future development in their area and tailor it to local area circumstances and needs.

They also provide a very useful tool in allowing local people to be directly involved in the planning of the local area, driving suitable development whilst also gaining an appreciation of the balances in growth required to deliver sustainable development. They are often developed following extensive public consultation with the local community and provide comprehensive detail on a very local level.

As such, the County Council considers that, as the neighbourhood planning process can be time consuming and it can be costly to produce a sound Neighbourhood Plan (with the process largely dependent on the goodwill of volunteers), any support that the Borough Council is able to provide to encourage their establishment is likely to be valuable - as neighbourhood planning groups may require support to ensure their plans are effective, impactful and accessible.

Question 30: Do you agree with these criteria? Are there any changes or additional criteria that you consider we should take into account?

No comment.

Question 31: Should the Council continue with the Local Plan Core Strategy's existing approach of ensuring existing settlements do not merge? If not, why?

The County Council recognises that the adopted Core Strategy seeks to ensure that existing settlements do not merge. It is understood that the proposed site allocations, as presented in Figure 14, would result in some settlements in the rural area merging by creating clustered settlements across the larger villages of Hook Green, Meopham and Higham. This option could potentially add significant pressure on existing facilities and infrastructure, with limited prospect of being able to create or sustain new infrastructure to meet demand and so the County Council does not support this approach.

Highways and Transportation: Should this approach change as indicated in the consultation document, highway infrastructure will need to be provided between the selected locations in order to allow people to travel between them in a sustainable way and not be reliant on the private car. A lack of high-quality footways and a lack of cycle facilities in general is common in rural areas and needs to be addressed. There is concern that some areas will be located outside of reasonable walking distances. High quality and frequent bus services would need to be provided.

Question 32: Do you have any views in relation to the sites identified in meeting the Borough's needs so far?

Transport Strategy: KCC has undertaken work on a Strategic Outline Business Case for a potential overnight lorry park on KCC land adjacent to Gravesham Site GB07 "Former Tollgate Hotel" and would draw attention to paragraph 107 of the National Planning Policy Framework.

Provision and Delivery of County Council Community Services: The County Council notes that proposed allocated sites have been provided as appendices to the main consultation document. KCC would welcome early conversations to discuss the housing delivery trajectories once an emerging growth strategy is chosen and to plan for the need, funding and delivery of all necessary KCC infrastructure and services to ensure that growth in these areas sustainable.

Minerals and Waste

Land-won Mineral safeguarding

The County Council, as Minerals and Waste Planning Authority, notes that Figure 14 illustrates the sites that could contribute towards meeting the Borough's development (supported by appendices). The sites identified appear to not coincide with any safeguarded land-won minerals outside the recognised urban area (as shown on the adopted proposals map: Gravesham Borough Council - Mineral Safeguarding Map of the adopted Kent Minerals and Waste Local Plan (KMWLP)). Provided this is, and remains, the case, mineral safeguarding of land-won minerals will not be a material consideration for this Local Plan Partial Review as it proceeds through its regulatory consultative steps.

If additional sites come forward that are coincident with either River Terrace or Sub-Alluvial River Terrace Deposits and are outside the defined urban and settlement boundaries in the Borough, then Mineral Assessments will be required.

The Minerals Assessment will determine whether or not the allocation(s) would be exempt from the presumption to safeguard these mineral deposits from needless sterilisation (as set out in Policy CSM5: Land-won Mineral safeguarding of the adopted and recently partially reviewed KMWLP). The exemption criteria to be met are detailed in Policy DM7: Safeguarding Minerals Resources of the KMWLP. Such assessments would be part of the respective allocation's justificatory evidence base in the event that they are required and it would need to be demonstrated that an exemption is justified for the allocation to be part of a sound Plan.

Minerals and Waste Infrastructure Safeguarding

The Borough has a number of safeguarded mineral importation (wharves) and waste management facilities that are safeguarded (see Policy CSW16: Safeguarding of Existing Waste Management Facilities of the KMWLP).

Figure 14 appears to indicate that none of the sites either directly conflict with, or come within 250m of, safeguarded sites. If additional sites are identified in the emerging Local Plan that do either directly conflict with the continued use of the site for mineral/waste management purposes or are within 250m of the safeguarded sites, then Infrastructure Assessments will be required.

The Assessments would need to determine whether or not the allocation(s) would be exempt from the presumption to safeguard. The exemption criteria and other material considerations to be met are detailed in Policy DM8: Safeguarding Minerals Management, Transportation, Production & Waste Management Facilities of the KMWLP. Such assessments would be part of the respective allocation's justificatory evidence base in the event that they are required. They would have to demonstrate that an exemption is justified for the allocation to be part of a sound plan for submission to the Secretary of State for Examination.

Figure 11 sets out Local Plan Core Strategy Key Sites (employment, mixed use and residential). It is notable that there are a number of strategic mineral wharves in the general location of these sites. Accurate determination of boundaries and proximity of these sites against the safeguarded minerals and waste infrastructure is somewhat difficult to discern. If any of the sites are coincident with, or are within 250m of, any safeguarded wharves (Clubbs Marine Terminal, Old Sun Wharf, Red Lion Wharf, Wharf 42 [including Northfleet Cement Wharf] and Northfleet Wharf) then Infrastructure Assessments will be required. As set out above, the relevant tests for what sites would classify as being exempt from the safeguarding presumption and for what is acceptable are set out in Policy DM8 of the KMWLP.

The County Council notes that some of the strategic sites within the Core Strategy Partial Review may have been part of previous Local Plan consideration. Where sites are being carried forward into a partial review of the Plan, it does not exempt them from being considered against the presumption to safeguard the minerals and waste management infrastructure that they might affect. In the case of extant planning permissions on any of these Core Strategy sites, the relevant assessment may well have been carried out already and demonstrated that the development allocated for in broad principle may be acceptable. However, this does not remove the need to consider safeguarding matters again as part of the Local Plan's Partial Core Strategy and Site Allocation Review at this time.

Heritage Conservation: An assessment has been undertaken primarily from readily available resources held by the Kent County Council Historic Environment Record on the proposed site allocations. This is provided in Appendix 1. It is not a detailed appraisal, but merely provides a broad initial view on the sensitivity of the archaeological resource and the way in which this should be approached for each of the options, which will need to be undertaken as the Local Plan progresses.

Question 33: Are there any alternative approaches that the Council should consider?

The County Council recognises the importance of this Local Plan Partial Review process to plan for future growth within Gravesham, with policies in place to ensure that growth is sustainable. Should other approaches be put forward for consideration under this Local Plan Partial Review consultation, the County Council requests continued working with the Borough Council, to enable full consideration of the potential implications and the range of infrastructure requirements to help ensure that a sustainable and deliverable housing strategy for Gravesham is progressed.

Question 34: Should the Council be more specific in relation to defining the Open Spaces that are protected and be more specific regarding future provision?

The County Council would suggest that there should be spaces protected for informal physical activity to support sustainable growth. These should be designed into any new development to ensure that new and existing communities have access to suitable open spaces for sports and recreation purposes.

The pandemic has highlighted that access to these spaces can have positive physical and mental health benefits and should be considered a key piece of infrastructure in the delivery of sustainable development.

The County Council recommends that future provision should be accessible by sustainable means, ideally walking and cycling. These should form part of a requirement for future provisions. The spaces should also be multifunctional, offering opportunities for a diverse range of uses so it can be the needs of all members of the community.

Multifunctionality should also extend to the implementation of sustainable drainage systems, which are often associated with delivery of open space. Assessing drainage in conjunction with other provisions such as biodiversity enhancements for new development, and any open space allocations, can mean that a more efficient design proposal is developed that can better accommodate housing requirements.

Question 35: Should the Council designate local green spaces? Do you agree with the local green space criteria identified?

Access to green and blue spaces for leisure can enhance mental health and give opportunities for physical activity, which improves both mental and physical health. Studies have shown that local green spaces provide considerable health and well-being benefits for the public, but the creation and preservation of this resource will come under increasing pressure from new development. With this in mind, the provision of high-quality open space and green infrastructure, which provide opportunities for outdoor leisure and recreation, are important infrastructure requirements that must not be neglected if new development is to be successful.

The provision of a well-connected network of green and blue infrastructure can also provide multiple benefits for health, climate change adaptation for both flood and heat and air quality benefits, whilst also possibly having economic benefits. This should be reflected in the Local Plan Partial Review across health, infrastructure and environmental themes.

The County Council supports designation of local green spaces to ensure this valuable resource is accessible to both new and existing communities.

Question 36: Are there any additional sites that should be considered for local green space designation through the plan making process? If yes, please see Appendix 2 for further information on how to nominate a site.

No comment.

Question 37: What particular pressures do you experience in relation to existing infrastructure, please provide details such as type of infrastructure and location?

The County Council provides vital community services that are experiencing increasing pressures and constraints as a result of growth across the County. Significant investment is needed to release these pressures. The County Council highlights a number of areas below where pressures are felt in relation to existing infrastructure.

Highways and Transportation: Sustainable transport must be integrated and delivered to support growth in the Borough. There is a lack of segregated cycle facilities across the Borough and in particular, a lack of high-quality pedestrian and cycle facilities in more rural areas, which would need to be improved. KCC will require appropriate improvements to these facilities to connect residents and employees with key destinations and reduce reliance on the private car.

Fastrack provides a high-quality bus service to the town centre, however, the rural areas have limited bus services. These will need to be improved to cater for new developments although there is concern over whether a critical mass will be available to achieve the required improvements.

The highway network is congested in a number of areas (such as Coldharbour, Milton Road) and there are limited opportunities to increase the capacity (due to lack of available highway land and economies of scale), especially if development is spread out across the Borough. No highway capacity modelling has been undertaken at this stage so KCC is unable to comment further but will look to work closely with the Borough Council as this is progressed.

KCC recognises that the Local Plan Partial Review has been prepared in light of the latest information from Highways England on the Lower Thames Crossing (LTC) project. LTC is a large-scale infrastructure project, which if granted permission by the Secretary of State, will have significant impacts on Gravesham, both in terms of traffic and wider environmental implications. KCC has commissioned a study of the traffic impacts of the LTC on the strategic and local road network, together with proposed mitigation measures. The County Council will continue to engage with Highways England and Gravesham as the LTC project progresses.

Provision and Delivery of County Council Community Services: There is already considerable pressure on all County Council community services to ensure they are able to meet the evolving needs of the growing population. The County Council, as community infrastructure provider, must continue to be engaged in the production of the Local Plan to ensure the necessary infrastructure is planned for and delivered at the right time to support existing and new communities.

When a small number of large developments are proposed, the approach to mitigating the impact of development is much clearer and more deliverable as it provides a strategic focus for the planning and delivery of KCC infrastructure services in an effective and timely manner. The County Council is therefore keen to engage with the Borough Council as the development strategy is prepared.

Libraries

Library and registration services will be delivered from a network of buildings across the Borough. These will need to be accessible by good transport links to make a visit to a library (whether it is to borrow a book, use a public computer, find out information, register an important event or attend a social or learning activity) available to a high percentage of Gravesham residents. The locations of library buildings will develop to reflect changing demographics, working in partnership with other KCC and external partners to bring a range of services under one roof for an improved service offer and efficiency.

Physical library services will include outreach to smaller and more remote communities. For example, the mobile library service and home delivery to meet the needs of residents who may not be able to travel to a building location.

Physical services will be supported by a range of online and remote offers, for example registering a death by telephone, contacting the Ask a Kent Librarian team for information or borrowing e books and magazines. KCC's digital service offer will continue to develop, however, services that bring people together will continue to have an important part to play to help to tackle social isolation, digital exclusion and to promote community cohesion and health and well-being to people who live, work or visit Gravesham.

Waste Management: KCC, as the Waste Disposal Authority, is required to dispose of kerbside collected waste and also provide a service for householders to dispose of any additional waste brought directly to one of its centres.

The Pepperhill Waste Transfer Station and Household Waste Recycling Centre located at Station Road, Southfleet currently serves the Gravesham area. This facility is at capacity. In order to continue to provide a sustainable service, additional capacity needs to be provided in line with projections for Gravesham's expanding population, via developer contributions. KCC recommends that the Local Plan acknowledges the importance of this essential infrastructure and the demands on it generated from new housing.

Public Health: The County Council has public health responsibilities across Kent and is aware that how places are designed and built is crucial to creating a healthier, fairer and more sustainable society. Growth across the County offers a unique opportunity to build communities that actively promote positive health and wellbeing choices, thereby easing future pressures on health and other public services. For example, consideration can be given to the accessibility of schools via active transport and the availability of healthy food choices near schools. Growth can also be designed to be resilient to public health emergencies and offer, for example, opportunities for home working designed into new development.

Sustainable growth must address health and wellbeing for new and existing communities. This can be achieved not only considering healthcare and leisure infrastructure, but also by consideration of the wider determinants of health, such as access to green space, air quality and economic opportunity, and planning them into growth accordingly.

Infrastructure should be delivered to support the health and wellbeing of the Borough's residents and visitors, particularly through the wider determinants of health and ensure that the dispersal of new settlements and major extensions do not widen health inequalities between local communities. It should allow access to green and blue spaces for leisure – which would have positive effects on mental and physical health by providing opportunities for leisure and for physical activity.

In addition, growth will need to seek to improve air quality through all means; reduction in emissions from vehicles and buildings as well as access to cleaner forms of transport, including electric vehicles.

Adult Social Care: The Local Plan should have consideration of the KCC Adult Social Health Care and Health 'Your life, your wellbeing – A vision and strategy for adult social care 2018-2021'¹. All development should support independence, be accessible and include 'extra care housing' that is flexible and responsive to the changing needs of individuals.

¹ <https://www.kent.gov.uk/about-the-council/strategies-and-policies/adult-social-care-policies/your-life-your-wellbeing>

Cultural Provision: Culture contributes to placemaking by creating attractive, culturally vibrant and authentic places. It can build community bonds and cohesion, support individual health, wellbeing and resilience and foster civic identity and encourage stewardship. Cultural infrastructure should be in place to support growth, offering opportunities new and existing communities.

Question 38: Do you agree with the Council’s approach in working with infrastructure providers and other partners to ensure infrastructure is delivered to adequately meet the needs and mitigate the impacts of new development?

Close working with infrastructure providers is essential in ensuring the right infrastructure is delivered alongside growth, at the right time. To deliver sustainable development, a collaborative approach with all key stakeholders is required to ensure that growth can be delivered sustainably taking in to account all necessary infrastructure and services required to deliver robust and resilient communities. The County Council would therefore welcome continued engagement as a key stakeholder.

In promoting an “Infrastructure First” approach to development, the County Council would emphasise the need for infrastructure to be planned for, funded and delivered in a timely manner, ahead of residential and commercial growth as appropriate. Early engagement is therefore required to ensure that the necessary infrastructure provision is considered alongside the timings for its delivery to ensure it is available as required to support sustainable development.

The County Council notes that KCC has been identified as a key stakeholder for health and transportation infrastructure. The County Council draws attention to all of its statutory and non-statutory functions. County Council responsibilities extend beyond health and transportation infrastructure in its roles as Lead Local Flood Authority, Education Planning Authority, Minerals and Waste Planning Authority.

Question 39: Do you agree that the Council should be addressing the Climate Change emergency proactively? If not, why not and what are the risks involved in not taking suitable action at this stage?

The Borough Council should be addressing the Climate Change emergency proactively. Working with key stakeholders, the Local Plan will need to ensure that there are robust policies in place to protect the natural environment and to bring forward proposals that can help address the challenges of climate change.

The County Council would recommend the adoption of the Kent and Medway Energy and Low Emissions Strategy, which sets a target to reduce emissions to Net Zero by 2050 at the latest. The County Council would also recommend that planning policies actively encourage low carbon innovation in new developments and support the continued expansion of low carbon jobs and skills in Kent.

Failure to tackle the UK climate emergency at this stage presents a significant long term risk to the Borough, as outlined in the Kent Climate Change Risk and Impact Assessment (CCRiA) report. The adaptation catalyst tool can help improve resilience planning for the future climate and should be used in the preparation of the Local Plan.² The County Council would welcome further engagement on this matter.

² <https://publicwiki.deltares.nl/display/AP/Adaptation+Catalyst>

The Kent Design Guide, which is to be relaunched in 2021, contains a commitment to designing for sustainability. The County Council would recommend reference to this Guide within the Local Plan Review.

Biodiversity: The County Council would emphasise that a key factor in ensuring the best outcome for biodiversity is adherence to the mitigation hierarchy. This will help respond to the ecological crisis. It means developers must engage with this early on in the design of a development. Importantly, mandatory biodiversity net-gain is being introduced as the mitigation hierarchy alone is insufficient to prevent biodiversity loss. Ultimately, ensuring that ecologically beneficial designs are secured via the Local Plan will improve Gravesham's ecosystem services (complimenting paragraph 170 of the NPPF) and, for large developments, relieve the recreational pressure on designated sites/areas of conservation interest within the district.

The County Council has adopted the Biodiversity Strategy, which commits to setting out a five year implementation plan to sit alongside the strategy, with delivery of the targets broken down into smaller, shorter actions to progress towards the 25-year vision. The County Council would recommend that the Borough Council works closely with the Kent Nature Partnership so that the Local Plan can help embed and deliver the Strategy's ambitions to consider, protect and enhance Kent's valuable natural capital resource and the services it provides.

Question 40: Should the Council make provision for large-scale renewable energy generation? The Borough has recognised wind resource, would you welcome wind turbines?

The County Council supports the provision of large-scale renewable energy generation, in the right locations. All suitable sources should be considered, including small and large scale solar and district heating schemes. The County Council would welcome further discussions with the Borough Council on the provision of renewable energy sources.

Question 41: Should the Council require new development to accord with an energy hierarchy, which in order of importance seeks to minimise energy demand, maximise energy efficiency, utilise renewable energy, utilise low carbon energy, and only then use other energy sources.

The County Council fully supports the requirement that all new development must adhere to the energy hierarchy. Minimising energy demand will be essential if Net Zero targets are to be met. The County Council urges that the use of fossil fuels should be avoided.

Question 42: Should strategic development allocations be required to make use of decentralised heating and cooling networks?

KCC encourages all new developments to be built to low carbon standards and preferably Net-Zero where possible. Sustainability should be considered from the outset of the design of a new development. This should include consideration of the orientation of the building (such as south facing roofs), and consideration of technologies that could be incorporated into the building to provide renewable heat and electric.

The County Council encourages the use of decentralised heating and cooling networks, such as Combined Heat and Power (CHP) and district heat networks in strategic

developments, where there are assurances that the energy costs will remain affordable for users. The County Council would support the development of policies which require all developments to incorporate high levels of renewable and/or decentralised energy, such as solar PV and district heating, with this requirement identified early in the design stage to reduce costs.

The County Council would also recommend that developments should include high levels of insulation, but they should also be designed to prevent overheating, to ensure that homes are robust against the challenges presented by climate change.

It should be noted that from 2025, the Futures Home Standards will require that there no more gas or fossil fuelled new developments.

Question 43: Should the Council require new developments to include a detailed carbon assessment to demonstrate how the design and layout of the development has sought to maximise reductions in carbon emissions, where appropriate?

The County Council supports the use of carbon assessments in new developments. These assessments should consider emissions during construction and end of life phases, in addition to the emissions during use. This would be particularly valuable for large developments where the cumulative impact of carbon emission reduction measures will be greater felt.

Question 44: Should the Council require developers to contribute towards increasing the area of habitats that sequester and store carbon, including through the provision of additional tree and shrub cover within the Borough?

The County Council would support increases in habitats that sequester and store carbon, however, this would need to be carefully managed to ensure that the most suitable plant and tree species are planted in appropriate places. Furthermore, there must be provision and consideration for the long-term management of such areas. The Borough Council may wish to consider developing a carbon sequestration offset fund that developers contribute to, rather than require developers to provide the additional tree and shrub coverage within the development.

Question 45: Should the Council seek to deliver net zero carbon development at a faster rate than allowed for by Government Building Regulations?

The County Council would support the development of policies that require stricter carbon standards than current Building Regulations. KCC's latest analysis of Net Zero pathways for the county indicate that the Kent target will only be met if new homes have significantly lower energy demand and efficiency than current standards. The use of Passivhaus standards, or equivalent, are needed as across all new developments to meet Net Zero targets.

Regulation 18 Stage 2 Consultation
Part 2: Draft Development Management Policies Document
October 2020

Page	Chapter	Policy / paragraph	Respondent	Commentary
15-16	3. Green Belt 3.3. New dwellings for agricultural, forestry or other rural workers in the Green Belt	Proposed Policy GB1: Agricultural and Forestry Development Proposed Policy GB2: New Dwellings for Agricultural, Forestry and Other Rural Workers in the Green Belt	Heritage Conservation	<p>The County Council welcomes the commitment to ensure that new development in the countryside is in keeping with the character of existing settlements. It should be noted that development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. Historic England (together with KCC and the Kent Downs AONB team) has published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character of the countryside.</p> <p>The Kent Farmsteads Guidance¹ has been endorsed by the County Council and it is recommended that Gravesham Borough Council considers adopting the guidance as Supplementary Planning Document, as part of the Local Plan process. The County Council would welcome further engagement on this matter.</p>
15-16	3. Green Belt 3.3. New dwellings for agricultural, forestry or other rural workers in the Green Belt	Proposed Policy GB1: Agricultural and Forestry Development Proposed Policy GB2: New Dwellings for Agricultural, Forestry and Other Rural Workers in the Green Belt	Rural Economy	<p>The County Council considers that the diversification of farms is of vital importance and can be the difference to them being profitable (and surviving) or not. Therefore, this policy to assist with farm diversification projects is to be welcomed. The policy mentions farm shops, processing, leisure activities etc but there is no specific mention of the visitor economy. Many farmers convert redundant buildings into holiday lets, or glamping/camping sites. KCC recommends reference to this as an important diversification avenue for farmers.</p> <p>The County Council notes the reference to increased traffic on country lanes, further reference should be made to the increase in size of farm machinery. Farm machinery that needs to be taken from field to field (often by contract farmers farming someone else's land) and the increasing size of this machinery makes it difficult to access some lanes. Farmers will need to alter the access and egress to farm sites and create new entrances to some fields. The Local Plan should take account of this.</p> <p>The County Council welcomes the policy reference to housing for farm workers (and other rural workers), especially where it is near their place of work</p>
17	3. Green Belt 3.4 New Buildings and other Facilities for Outdoor Sport, Recreation and Cemeteries in the Green Belt	Paragraph 3.4.5	Public Rights of Way and Access Service	<p>While the general text of this policy is supported, the County Council recommends that additional wording should be inserted in paragraph 3.4.5 to ensure there is a good provision of sustainable transport connections with the sites. There should be walking, cycling and public transport connections available to encourage active travel and provide realistic alternatives to private car journeys. This approach would help to reduce traffic congestion on the highway network by minimising vehicle journeys.</p>
27	3. Green Belt 3.8 Re-use of Buildings in the Green Belt	Proposed Policy GB 7 Re-use of Buildings in the Green Belt	Rural Economy	<p>The County Council welcomes the proposal for the re-use of redundant buildings in the Green Belt for diversification purposes.</p>
31	4. Agricultural Land 4.1. Protection of Good Quality Agricultural Land	Proposed Policy AG 1 Agricultural Land	Rural Economy	<p>The County Council welcomes the protection of good quality agricultural land in terms of future food production and food security and would recommend reference to how land may adapt and change due to climate change and the wider implications of this.</p>

¹ <http://www.kentdowns.org.uk/publications/kent-downs-aonb-farmstead-guidance>

36	5. Retail 5.5. Retention of Public Houses	Proposed Policy RE 5: Retention of Public Houses	Rural Economy	The County Council welcomes the recognition of the importance of rural public houses – they are an important rural community hub and a driver for rural tourism. They are also an important link in the rural food supply chain as outlets for local food and drink provide by local farms and businesses.
52	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development		Highways and Transportation	The County Council notes that the 2014 Core Strategy sought to improve public transport provision and facilities, including segregated bus lanes. The County Council, as Local Highway Authority, recognises that public transport has not been mentioned within this consultation document and there is no mention at all of Fastrack and its importance in encouraging modal shift. KCC requests that more emphasis is placed on public transport and the benefits it can achieve. In addition, in support of cycling infrastructure, reference could be made to recently published government guidance, such as “Gear Change: A bold vision for cycling and walking” (2020) ² .
52	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Paragraph 6.2.5	Highways and Transportation	KCC supports Proposed Policy INF 1: Route Safeguarding, as this will secure the routes required for future sustainable infrastructure. The County Council proposes the following changes to give more emphasis on sustainable transport modes and recognise that whilst a shift from petrol/diesel vehicles to electric vehicles will be good for the environment it will not solve any congestions issues on the local highway network <i>6.2.5. Core Strategy policy CS11 on Transport sets out the Council’s strategic approach in this area, with the objective of facilitating the movement of people, goods and services in a sustainable way. This means trying to reduce reducing reliance on the private car and road based transport of goods, with a move toward walking, cycling, the use of public transport, and more use of the River Thames for the carriage of both passengers and goods. The gradual introduction of electric vehicles will assist in making road trips more sustainable in terms of air quality, although their presence will still have an impact on congestion and their needs will also have to be accommodated.</i>
52	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Paragraph 6.2.7	Highways and Transportation	The County Council recommends the following amendment to this paragraph: <i>6.2.7. Where new highways and accesses are being constructed to serve existing or new development, it is important that this is done in a safe manner which is compliant with both local and national highway standards, taking into account the circumstances of a particular location and the characteristics of the road concerned.</i>
53	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Paragraph 6.2.14	Highways and Transportation	The County Council recommends the following amendment: <i>6.2.14. ... It also means that appropriate visibility splays sight lines will need to be provided so that drivers using the access point can see oncoming traffic.</i>
53	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Paragraph 6.2.19	Highways and Transportation	The County Council recommends the following amendment: <i>6.2.19. As noted above, transport is not simply about accommodating additional traffic on the highway network, it is also about providing sustainable alternatives to the private car. when there may be more sustainable alternatives that can be considered.</i>
53	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Footnote 15	Highways and Transportation	Reference is made to the KCC guidance document ‘KCC guidance Transport Assessments and Travel Plans’, Oct 2008. This should be removed, however reference to the KCC pre-application service should remain.

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf

54	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Paragraph 6.2.20	Public Rights of Way and Access Service	The reference to the KCC Rights of Way Improvement Plan (ROWIP) is acknowledged and supported. However, it is requested that additional text is inserted into this paragraph, advising developers to engage with KCC at an early stage of the planning process. The County Council could then discuss their proposals in advance with the applicant and provide advice on PRoW matters, before the submission of a planning application. This approach would help prevent delays later in the planning process.
55	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Proposed Policy INF 2: Transport Design Principles	Highways and Transportation	KCC generally supports Proposed Policy INF 2: Transport Design Principles. However, a Travel Plan will also be required for major developments, regardless of whether this is needed for mitigation purposes or not. KCC also questions the use of ' <i>unless otherwise justified as an exception</i> ' in terms of EV charging, as this provision should be provided as standard. KCC recommends paragraph 6.2.27 should include reference to high quality walking and cycling links.
55	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Proposed Policy INF 2: Transport Design Principles	Public Rights of Way and Access Service	Given the value and importance of the PRoW network to the local community, there should be a requirement for development applications to show PRoW on their plans. The following wording should be added to paragraph 6.2.25: <i>"Where PRoW would be directly affected by development, proposals should illustrate how the existing PRoW network will be positively accommodated within the site."</i>
56	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Proposed Policy INF3: Understanding and Mitigating Transport Impacts	Highways and Transportation	KCC generally supports proposed Policy INF3: Understanding and Mitigating Transport Impacts. However, it should be noted that Travel Plans are not just about mitigating impacts – Travel Plans will be required for larger sites regardless of whether there is a severe traffic impact. Paragraph 6.2.32 states " <i>Sufficient parking in new development will be provided in accordance with the Council's adopted parking standards which will reflect the availability of alternative means of transport, accessibility to services and facilities, and the objective to secure a modal shift to more sustainable modes</i> ". The Borough Council currently defers to KCC's parking standards – KCC requests clarification on whether this is to continue. If this is not the case, KCC would welcome discussion on any parking standards that are to be developed. KCC's parking standards are contained in Interim Guidance Note 3: Residential Parking for Residential ³ and Supplementary Planning Guidance (SPG 4) Kent Vehicle Parking Standards ⁴ for non-residential. It is understood that the Borough Council has not adopted IGN3. KCC is currently drafting revised parking standards which will combine standards for both residential and non-residential uses.
56	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Proposed Policy INF3: Understanding and Mitigating Transport Impacts	Public Rights of Way and Access Service	The inclusion of PRoW within this text is welcomed and supported.
56	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Proposed Policy INF 4: New Accesses and Junctions	Highways and Transportation	KCC is generally supportive of proposed Policy INF 4: New Accesses and Junctions. Paragraph 6.2.35 states " <i>All such accesses and new on-site highways associated with them should unless otherwise justified as an exception: Ensure vehicles can easily reach the necessary loading, servicing, and parking areas on-site without the need for multiple manoeuvres</i> ". The County Council recommends that reference is made to the need for appropriate drag distances for refuse vehicles to designed in line with local and national guidance.

³ <https://democracy.kent.gov.uk/documents/s12688/Item%20B5%20Appendix.pdf>

⁴ https://maidstone.gov.uk/data/assets/pdf_file/0010/88984/Kent-and-Medway-Structure-Plan-2006-SPG4-Vehicle-Parking-Standards.pdf

59	6. Infrastructure 6.3. Electric Vehicle Charging Points	Proposed Policy INF 5: Electric Vehicle Charging Points ¹⁸	Highways and Transportation	<p>KCC is generally supportive of proposed Policy INF 5 Electric Vehicle Charging Points. With regard to paragraph 6.3.7, the encouragement of the implementation of electric vehicle charging infrastructure is welcomed and will help to encourage a shift away from petrol and diesel vehicles, improving the air quality in the Borough and beyond.</p> <p>It is also recognised that Policy INF5 will be updated as appropriate to reflect emerging government guidance. However, in line with KCC's emerging parking standards, KCC would like to see a bolder commitment to EV infrastructure for shared parking areas, requiring a minimum of 10% active spaces and 90% passive spaces for residential car parks, and 10% Active Charging Spaces and 10% Passive Charging Spaces for non-residential car parks. KCC will also require developers to provide chargers that are a minimum of 7kw and would encourage the Borough Council to adopt the same approach.</p> <p>Reference should be made to the Kent and Medway Energy and Low Emissions Strategy.</p>
59	6. Infrastructure 6.3. Electric Vehicle Charging Points	Proposed Policy INF 5: Electric Vehicle Charging Points	Rural Economy	The County Council would also recommend consideration of charging points at rural locations, such as farm shops and countryside attractions.
60	6. Infrastructure 6.4. Telecommunications Infrastructure		Provision and Delivery of County Council Community Services	<p>The County Council recommends that this element of the Local Plan must balance the concern regarding the visual impact, with the recognition of the critical importance of digital infrastructure – this balance will ensure opportunities for connectivity investments from network operators. Given the current circumstances resulting from the COVID-19 pandemic, it is of vital importance that adequate digital infrastructure is developed to ensure connectivity to allow people to work from home as required.</p> <p>The County Council does welcome the inclusion of a dedicated telecoms infrastructure policy and provides the following comments:</p> <p>Paragraph 6.4.5 – current government policy (set out in the Future Telecoms Infrastructure Review) is for all premises to have access to gigabit capable broadband connections (e.g. full fibre). As such, the reference to the Government's previous superfast targets should be removed.</p> <p>It is important to recognise that citing constraints (e.g. what is required to achieve coverage) and the technical specifications/requirements of telecoms infrastructure limit the design options for broadband and mobile infrastructure. Not accommodating these constraints risks reducing future mobile and fixed broadband network coverage and connectivity.</p> <p>Paragraph 6.4.9 – the County Council recommends inclusion of the requirement that new homes should be provisioned with gigabit capable broadband. Government has announced and consulted on plans to introduce legislation requiring developers to provide broadband connectivity for new homes.</p> <p>Paragraph 6.4.10 – KCC recommends that the Local Plan will need to be mindful of the load bearing capacities of existing infrastructure – as well as the importance for high quality digital infrastructure for social and economic well-being of local communities and businesses.</p>
68	7. Green Infrastructure 7.1 Green Space, Playing Pitch and Sports Facility Standards	Proposed Policy GI 2: Open Space, Playing Pitches and Sports Facilities Provision	Public Rights of Way and Access Service	<p>The proposed green infrastructure policies are welcomed by the County Council, though additional wording should be added to the first bullet point of Policy GI 2 covering improvements to the accessibility of open spaces and recreational resources.</p> <p>In addition to being publicly accessible, there must be a good provision of walking and cycling routes to the sites, to provide opportunities for active travel. The public should not be dependent on private vehicle use to access these sites. Improved connectivity should encourage recreational and leisure activity, including access to country parks, honey pot sites and other facilities of high leisure.</p>
70	7. Green	Proposed Policy GI 3:	Heritage	To identify which local green spaces are significant and contribute to the character of the Borough, it may be helpful for the Borough

	Infrastructure 7.2. Local Green Spaces	Local Green Spaces	Conservation	Council to carry out a Parks and Gardens / Green Spaces Assessment. KCC has been working with the Kent Gardens Trust for the last few years, on a district by district assessment of parks and gardens and green spaces. Volunteers research the history and development of different green spaces and write Statements of Significance, that are helpful to planning authorities in assessing the impact of proposed change on the spaces concerned. It would be helpful if the Borough Council carried out a similar survey which would also prepare the spaces for inclusion on a Local List of Heritage Assets. KCC would welcome further discussions on this matter.
72	7. Green Infrastructure 7.3. Trees, Hedgerows and Woodland	Proposed Policy GI 4: Trees, Hedgerows and Woodland	Heritage Conservation	<p>The text states the importance of trees, hedgerows and woodland and the contribution that they make to local character. At present, however, it does not mention that the pattern of tracks, lanes and field boundaries have a similar and complementary role. The landscape that is visible today is the result of many centuries of evolution and the pattern of roads, tracks, field boundaries and hedgerows that gives the modern landscape its character is firmly rooted in the past. A Green Infrastructure Strategy would have the potential to use some of these historic linkages to give shape to the open spaces that are to be developed or retained. The Kent Historic Landscape Characterisation Survey (2001) (HLC) is an important resource for understanding the landscape of Kent and its development through time. KCC acknowledges, however, that the HLC is a strategic, not local, assessment. It allows a look at the landscape of Kent and draw conclusions about the development of the landscape in different parts of the county and the county as a whole. It is not detailed enough to use at a large scale. It was also entirely map-based and involved no survey or site visits at all. It is not appropriate, therefore, to use the HLC data alone to inform specific development proposals or to identify potential development sites.</p> <p>To be fully effective in local planning and development control, the Historic Landscape Characterisation should be backed up by more detailed district-wide or case-by-case analysis, to add greater detail through secondary sources. KCC would be happy to discuss this further.</p>
75	7. Green Infrastructure 7.4. Landscape Character	Policy GI 5: Landscape Character	Heritage Conservation	<p>The County Council welcomes the policy on Landscape Character as this is often neglected in local plans. KCC is also pleased to see the Farmstead Guidance produced by the Kent Downs AONB, Historic England and KCC referenced here.</p> <p>The comments made with regard to Policy GI 4 above also apply here. The Historic Landscape Characterisation Survey (2001) should also be referenced here and, if possible, enhanced by local study.</p>
80	7. Green Infrastructure 7.5. Biodiversity	Policy GI 6: Biodiversity	Biodiversity	<p>Paragraph 7.5.28 - The reference to the connection and improvement of ecological networks is vital. Fragmentation is a serious threat to biodiversity and KCC recommends the following amendment:</p> <p><i>“... Opportunities will be taken to connect and improve ecological networks and linkages both within Gravesham and to similar networks in adjoining areas.”</i></p> <p>Paragraph 7.5.29 - The County Council is supportive of this section, as demonstrable <i>measurable</i> net-gain is fundamental to limiting/negating biodiversity loss and, importantly, will be mandatory in the near-future. This policy accommodates this impending legislation. The County Council also welcomes justification being required for when the mitigation hierarchy has not been adhered to.</p> <p>Paragraph 7.5.30 - The County Council is supportive of demonstrable long-term management delivery as this information is often neglected or too vague within planning applications.</p> <p>Paragraph 7.5.31 - The County Council is supportive of this paragraph and highlights the benefit of referencing specific sites of conservation importance, such as ‘Local Wildlife Sites’.</p> <p>Paragraph 7.5.32 - The County Council is supportive of this policy as over-wintering birds along the north Kent coast are subject to</p>

				high degrees of recreational disturbance. The North Kent Strategic Access Management and Monitoring Strategy (SAMMS) helps to mitigate against the adverse effects upon the designated sites and their bird populations.
84	8. Flood Risk and Water 8.2 Managing Water Quality	Policy FW 1: Managing Water Quality	Sustainable Urban Drainage Systems	There is currently a review of the Non-Statutory Technical Standards (NSTS) for Surface Water Drainage which the County Council, as Lead Local Flood Authority (LLFA), uses to assess drainage submissions. It has been proposed the surface water standards will include a standard to assess water quality. It is beneficial that this policy is clear in the need for assessment but flexible enough in wording that it may also include any future changes that may occur in the NSTS.
86	8. Flood Risk and Water 8.3. Managing water supply and efficiency in new development	Policy FW 2: Managing water supply and efficiency in new development	Rural Economy	The County Council would also recommend consideration of housing growth and the resulting impact on water resources and crops which are heavily water dependant.
89	8. Flood Risk and Water 8.4. Managing Flood Risk	Policy FW3: Managing Flood Risk	Sustainable Urban Drainage Systems	The County Council notes that there is a focus upon tidal flood risk and climate change. Paragraph 8.4.7 notes that other types of flood risk, such as surface water flood risk may require due consideration. The County Council recommends reference the Environment Agency's mapping of surface water flood risk, which does highlight specific potential overland flow paths which will need consideration and assessment for any new development.
93	8. Flood Risk and Water 8.6 Managing Surface Water Drainage	Managing Surface Water Drainage	Sustainable Urban Drainage Systems	KCC policy is outlined in KCC's Drainage and Planning Policy which was adopted November 2019. The policy will be reviewed in 2021 given other changes proposed in planning. As mentioned above, it may be worth noting that the NSTS are currently under review and possible revisions may be proposed in the near future (anticipated February 2021). The County Council welcomes the inclusion to multi-functional benefits within the policy.
93	8. Flood Risk and Water 8.6. Managing Surface Water Drainage	Policy FW5: Managing Surface Water Drainage	Heritage Conservation	Sustainable Drainage Schemes (SuDS) may have both direct and indirect impacts on the historic environment. Direct impacts could include damage to known heritage assets – for example if a historic drainage ditch is widened and deepened as part of SuDS works. Alternatively, they may directly impact on unknown assets such as when SuDS works damage buried archaeological remains. Indirect impacts are when the ground conditions are changed by SuDS works, thereby impacting on heritage assets. For example, using an area for water storage, or improving an area's drainage can change the moisture level in the local environment. Archaeological remains are highly vulnerable to changing moisture levels which can accelerate the decay of organic remains and alter the chemical constituency of the soils. Historic buildings are often more vulnerable than modern buildings to flood damage to their foundations. When SuDS are planned, it is important that the potential impact on the historic environment is fully considered and any unavoidable damage is mitigated. This is best secured by early consideration of the local historic environment following consultation with the Kent Historic Environment Record (HER) and by taking relevant expert advice. KCC has recently produced guidance for SUDS and the historic environment. It provides information about the potential impact of SuDS on the historic environment, the range of mitigation measures available and how developers should proceed if their schemes are believed likely to impact on heritage assets.
139	11. Design 11.4 Designing for a High Quality and Accessible Riverside	Proposed Policy DES 4: Designing for a High Quality and Accessible Riverside (Page 139)	Public Rights of Way and Access Service	The County Council notes that there no reference to the England Coast Path (ECP) within this policy, despite the supporting text highlighting this National Trail (Paragraph 11.4.4). To address this matter, it is requested that additional text is inserted into Paragraph 11.4.15, stipulating that future development should accommodate and enhance the ECP, as per the National Planning Policy Framework (Paragraph 98).

142	12. Heritage Assets 12.1 Heritage Assets	Proposed Policy HER1: Development Involving Heritage Assets	Heritage Conservation	<p>Paragraph 12.1.16 – The County Council welcomes the commitment to the protection, conservation and enhancement of heritage assets reflected in this paragraph, and in particular the encouragement given to the re-use of heritage assets. This commitment to re-using heritage assets will be helped by advance information about where they are. Therefore, KCC would encourage the Borough Council to develop a local List of Heritage Assets (not just historic buildings) so that the assets can be identified, and their significance be given added weight in the decision-making process.</p> <p>Paragraph 12.1.17 – 12.1.19 - The text describes the conditions under which development affecting designated heritage assets will be permitted. Whilst KCC has no objection to the criteria presented it should be noted that recent reviews of how designated assets have been treated during the development control process have noted how often heritage has been sacrificed by the application of such criteria⁵. The review concluded that “The balance between heritage and other public benefits was found to be a judgement easily made in favour of other benefits”. KCC would encourage the Borough Council to ensure that applicants proposing to develop in/near heritage assets in a way that impacts on their significance be obliged to show that alternative development options, including design alternatives, have been fully considered. This consideration of alternatives should be standard practice, comparable to Environmental Impact Assessment.</p> <p>Paragraph 12.1.20 - The text states that a Heritage Statement will be required where development affects the significance of either designated or non-designated heritage assets. KCC recommends that the text is modified to indicate that the scope and detail to be presented in the Heritage Statement needs to be appropriate to the proposed impact. For a more significant asset, the Heritage Statement will need to be more detailed than for a less significant asset - with some Heritage Statements needing to be accompanied by professional assessments, potentially involving fieldwork. The County Council also suggests that the Borough Council prepares detailed guidance for applicants to help them write effective Heritage Statements.</p> <p>There are a number of issues with how Heritage Statements are currently formulated. Mostly these revolve around the fact that they are generally regarded as Validation requirements. They are often accepted in a tick-box exercise, irrespective of quality, and it is doubtful that in such cases they play a meaningful role in decision-making. For this paragraph to be effective, it is important that the current approach is changed so that Heritage Statements are well designed, challenged where appropriate, and are genuinely useful to planning officers and applicants alike. This may mean taking the Heritage Statement work flow away from the Validation process. KCC’s Heritage Conservation team is currently engaged in a project to review how Validation and Heritage Statements operate in Kent and would be pleased to discuss this further.</p>
144	12. Heritage Assets 12.1 Heritage Assets	Proposed Policy HER 3: Conservation Areas	Heritage Conservation	As the text notes, the process of Conservation Area Appraisal (CAA) is essential for assessing the impact of development proposals on character and significance. The Borough Council has CAAs for most of its rural Conservation Areas and KCC would encourage the Borough Council to continue the CAA process for its urban Conservation Areas too.
145	12. Heritage Assets 12.1 Heritage Assets	Proposed Policy HER 4: Archaeology Conservation Areas	Heritage Conservation	The County Council is supportive of this policy as currently drafted.
Gravesham Heritage and Character Background Paper				
			Heritage Conservation	<p><u>General</u></p> <p>The text states in paragraph 1.1.7 that it intends to focus on those areas of Gravesham that have been subject to most change. If the aim of the document is to assess the heritage and character of the Borough, however, then this is not appropriate. Although the</p>

⁵ <https://content.historicengland.org.uk/content/docs/planning/7559-heritage-in-planning-decisions-green-balance.pdf>

			<p>consideration of the aspects in which the text has reviewed is highly detailed, some of the most significant themes of Gravesham's heritage are left largely unaddressed. This brings the inevitable risk that these themes will be assumed to be less important, and less worthy of conservation and protection, than those the text has covered.</p> <p>The importance of Gravesham's prehistoric resource is underestimated in the text. The Dartford/Gravesham area is of international significance for the Palaeolithic period. Within Gravesham there have been numerous finds of Palaeolithic handaxes and flakes but also important faunal remains such as the remains of mammoth, elephant and rhinoceros. Numerous Mesolithic flints have been found across the Borough. A Neolithic mortuary enclosure or barrow has been found at Tollgate and Early Neolithic pottery and flints were discovered together with a possible timber trackway in 1938 at Ebbsfleet (now a scheduled monument). More recent excavations at Ebbsfleet have revealed many more Neolithic features including hearths, pits and evidence of flint working. There is extensive Bronze Age evidence. A Bronze Age barrow (scheduled monument) exists within Ashenbank Wood and numerous examples of ring-ditches have been seen in aerial photography. Probable settlements have been identified from aerial photography and several have been excavated. There are also numerous finds of Bronze Age metalwork from across Gravesham including axes, rapiers, awls and other tools. Similarly, widespread Iron Age settlement evidence has been found, such as at Tollgate, Coldharbour Road, Northumberland Bottom and Singlewell.</p> <p>An area of particular significance, which is mentioned in the text but not given enough prominence, is the Ebbsfleet Valley. Excavations carried out over many years now have revealed that the valley is of great significance for the archaeology of many periods. Although the western half of the valley is in Dartford, it needs to be considered in its entirety if its significance is to be understood. It is one reason why it might be appropriate for Dartford Borough Council, Gravesham Borough Council and the Ebbsfleet Development Corporation to consider developing a joint Heritage Strategy. The recent completion of an Urban Archaeological Database for the EDC area, with an extension for Springhead, would enable and enhance such a Strategy.</p> <p>The NPPF requires local planning authorities to "set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment". There is considerable scope about how to do this, but the most effective way may be to bring together all policies and actions related to the historic environment into a Heritage Strategy. This allows the Local Planning Authority to review the heritage resource, consider the main historic environment themes of relevance to the area and identify the heritage assets they comprise. The Strategy can also assess the main threats to the historic environment of the Borough and suggest ways in which it can be enhanced and exploited. Finally, the Strategy provides an Action Plan and can be used to refine policies to be adopted by the Local Plan. The advantage of this approach is that it fully integrates all aspects of historic environment policy. It prevents it from being developed piecemeal and in a fragmented manner which can lead to the historic environment failing to play a full role in the life of the Borough.</p> <p>Several Local Planning Authorities in Kent either have a Heritage Strategy already or are in the process of developing one. Although Gravesham has written a 'Heritage and Character' background paper, this does not really constitute a Heritage Strategy. In light of this, and the potential offered by KCC/EDC's recent completion of an Urban Archaeological Database for Ebbsfleet (a more detailed and comprehensive version of the Historic Environment Record) KCC Heritage would be happy to discuss this further. It is possible, for example, that Gravesham, Dartford and EDC could prepare a joint Heritage strategy. KCC, who wrote the Dover Heritage Strategy, and is preparing the Folkestone and Hythe Heritage Strategy, would be happy to assist with this.</p> <p>The goal of the strategy could be:</p> <ul style="list-style-type: none"> • To identify and describe the key themes of relevance of the heritage of the district and the heritage assets that represent them • To assess the role that these can play in in regeneration and tourism, including interpretation of key themes like Palaeolithic Gravesham, the archaeology of the Ebbsfleet Valley and Gravesham's maritime and industrial past • To identify both their vulnerabilities and the opportunities they provide • To inform site allocations within the district
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			<ul style="list-style-type: none"> • To support policy development <p>The Ebbsfleet Valley contains two areas of Scheduled Neolithic remains, which have become a type-site for Neolithic pottery. Also found were arrowheads and animal bones, and a possible timber trackway structure. Middle to late Bronze Age settlement evidence has also been found in the form of pits, ditches and field systems, and burial evidence in the form of ring-ditches. During the late Iron Age, the valley seems to have taken on a particularly ritual function. At the spring at the head of the valley a late Iron Age ritual landscape developed with a processional way running along the river. It was during the Roman period, however, that the valley was most intensively used for ritual purposes. A small road-side settlement ('Vagniakis') developed alongside the springs, focused on several temples and a walled cemetery to form a religious centre almost unique in Britain. A short distance downriver was a rich Roman villa accompanied by a bath house and waterfront structures. In the Anglo-Saxon, period perhaps three settlements were established in the valley accompanied by large and rich cemeteries, and an extremely well-preserved tidal watermill dating to AD 692 and the earliest of its kind in the country. The richness and diversity of the Ebbsfleet archaeological resource is unique in Kent and needs to be included in any review of Gravesham's heritage and character.</p> <p><u>Paragraph 1.1.4</u> To this list should be added:</p> <ul style="list-style-type: none"> - the Kent Historic Town Surveys for Gravesend and Northfleet (2004)⁶ - The Kent Historic Landscape Characterisation (2001) <p><u>Paragraph 2.1.12</u> Please note that the appropriate acronym for the Kent Historic Environment Record is HER, not HERS</p> <p><u>Paragraph 2.1.13</u> The general comments on the desirability of a Heritage Strategy made in relation to the Local Plan Core Strategy and here should be noted. This background paper would be a very good start point for such a strategy, but the key issues related to Gravesham's heritage and its potential and vulnerabilities need drawing out more.</p> <p><u>Paragraph 2.1.15</u> Please see comments in relation to 2.1.12 above.</p> <p><u>3.2 Historic Development</u> <u>Paragraph 3.2.1</u> While it is true that there is little evidence that human activity earlier than the iron age has affected patterns of settlement today, a case can be made that iron age use of the landscape is sometimes reflected in modern field boundaries and routeways. In addition, the landscape of modern Gravesham is certainly reflective of the landscape of earlier periods. For example, the geological and landscape factors that make Gravesham important for palaeolithic archaeology are also those that made it attractive industrial exploitation in later periods.</p> <p><u>Paragraph 3.2.15</u> The text describes Gravesend's role as a Garrison town but does not actually mention the very important heritage assets that demonstrate this. Even though this section is a rapid summary of the Borough's heritage, KCC would suggest that Gravesend and Milton Blockhouses and New Tavern Fort should be mentioned here.</p> <p><u>7 The Rural Area</u> The text reviews the Gravesham Landscape Character Appraisal at length but does not mention Historic Landscape Character. The rural settlements mentioned in the draft text do not exist in isolation, rather they are all linked by the landscape in which they sit.</p>
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⁶ https://archaeologydataservice.ac.uk/archives/view/kent_eus_2006/downloads.cfm

				<p>The landscape that is visible today is the result of many centuries of evolution and the pattern of roads, tracks, field boundaries and hedgerows that gives the modern landscape its character is firmly rooted in the past. The text notes, for example, in 7.1.19 that many of the sea defences in the marshes are historic in nature and that many features in the countryside have historic significance but it does not recognise that the landscape pattern itself is derived from centuries of human interaction with nature and has a historic character. The Kent Historic Landscape Characterisation Survey (2001) is an important resource for understanding the landscape of Kent and its development through time. KCC must emphasize, however, that the HLC is a strategic, not local, assessment. It allows us to look at the landscape of Kent and draw conclusions about the development of the landscape in different parts of the county and the county as a whole. It is not detailed enough to use at a large scale. It was also entirely map-based and involved no survey or site visits at all. It is not appropriate, therefore, to use the HLC data alone to inform specific development proposals or to identify potential development sites.</p> <p>To be fully effective, the Historic Landscape Characterisation should be backed up by more detailed district-wide or case-by-case analysis, to add greater detail through secondary sources. KCC be happy to discuss this further.</p>
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Gravesham Borough Council – Local Plan Core Strategy Partial Review - Site Allocations Document Consultation (2020)

Historic Environment & Archaeology

Introduction

The following assessment has been undertaken primarily from readily available resources held by the Kent County Council Historic Environment Record. It is not a detailed appraisal but merely provides a broad initial view on the sensitivity of the archaeological resource and the way in which this should be approached for each of the options. The sensitivity of particular sites may change following more detailed appraisal and in light of new information.

A 5-point scale has been used to rank the options with regard to archaeology. This is:

Scale	
1	Development of this site (or part of) should be avoided
2	Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.
3	Significant archaeology could be dealt with through suitable conditions on a planning approval.
4	Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.
5	No known archaeological potential on the site or part of it.

Note that for each described site several 'Scales' may be noted reflecting the varying potential across the site. For consideration of the site as a whole the lowest numerical 'Scale', i.e. that with the highest archaeological sensitivity, should be used.

Archaeological appraisal		Scale
GB05	<p>Land Adjacent to Higham Station, Higham 0.9 ha – commercial The site lies adjacent to Higham Station and Thames & Medway Canal. Historic mapping indicated that the site was quarried but it may have some modern industrial heritage interest.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	4
GB07	<p>Former Tollgate Hotel, Gravesend, Instead Rise 1.0 ha – commercial The site lies within an area of Romano-British archaeological potential. As the site has been previously developed as a hotel there will have been some past impacts.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	3
GB36	<p>Land West of Norwood Lane, Meopham (Churchways, Meopham). Meopham North 5.15 ha – 150 dwellings A site with presently unknown archaeological potential. The setting of Cramer House and associated listed buildings and historic park and garden at Camer Park should be considered.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	3
GB62	<p>Land north of the The Drove Way, Instead Rise. 2.48 ha – approx. 75 dwellings</p> <p>There is crop-mark evidence from the western part of the site and adjoining land to the west of below ground archaeological remains which could be of later prehistoric, Romano-British or medieval date (two medieval metal finds are recorded from the site). The site is in an elevated position on chalk, which is likely to have been favourable for past settlement. The site has been subject to cultivation including formerly as an orchard with processes that are likely to have impacted on any below-ground archaeological remains.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	3
GB65	<p>Land north of Steeles Lane, Meopham. Meopham South 3.12 ha – 95 dwellings A site with presently unknown archaeological potential. The land appears to have been pasture for some time and</p>	3

	<p>therefore any below-ground archaeological remains could be relatively well preserved. The setting of nearby listed buildings should be considered.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	
GB80	<p>Land west of Walmers Avenue, Higham. Shorne, Cobham & Luddesdown 1.38 ha – 40 dwellings</p> <p>A site with presently unknown archaeological potential. The site is in a relatively elevated position, on chalk adjacent to the A226 which as a route is likely to have had Romano-British and possibly later prehistoric origins. The site has the potential for below ground archaeological remains but the significance of these may be limited as a result of plough damage.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	3
GB93	<p>Rochester Road Health Clinic, Rochester Road, Gravesend. Riverside 0.19 ha – 5 dwellings</p> <p>A site with presently unknown archaeological potential, lying south-east of the former site of the medieval St Mary's church and within the grounds of the former Denton Court. The site is in a relatively elevated position, on chalk with mapped adjacent Pleistocene gravel and Head deposits with Palaeolithic potential, which may also underlie the site. The site is adjacent to the A226 which as a route is likely to have had Romano-British and possibly later prehistoric origins. The site has the potential for below ground archaeological remains but the significance of these may be limited as a result of past development.</p> <p><i>Development with some archaeological measures should be possible on this site.</i></p>	3
GB97	<p>Willerby Farm, Downs Road, Instead Rise. 0.30 ha – 10 dwellings</p> <p>Metal finds of medieval date have been recorded close to the site and lying within a dry valley with colluvial deposits there is the potential for preservation of below ground archaeological remains despite likelihood of some impacts from past development.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	4
GB104	<p>2 Vale Road, Northfleet 0.66 ha – 25 dwellings</p> <p>The site has been subject to quarrying in the 20th century. Some parts of the site, which lies on chalk, will not have</p>	4

	<p>been impacted by the quarrying and may have below-ground archaeological potential but there is little evidence for recorded archaeology immediately adjacent to the site. For example, from the chalk quarries or the railway line that bounds the site to the south.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	
GB105	<p>Land at Longfield Avenue, New Barn. Instead Rise 0.80 ha – 25 dwellings</p> <p>The site lies on chalk on the edge of a dry valley and has been partially developed in the past. The archaeological potential is uncertain but considered to be relatively low.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	4
GB109	<p>Land at North Kent College, Lower Higham Road, Gravesend. Riverside 1.85 ha – 75 dwellings</p> <p>The site lies on chalk, sloping north towards the Thames marshes. Later prehistoric and Romano-British archaeological remains have been recorded immediately to the north of the site and aerial photographs suggest the potential for below ground archaeological remains such as buried ditches.</p> <p><i>Development with archaeological measures should be possible on this site but development proposals should be accompanied by an archaeological desk-based assessment and preferably the results of a geophysical survey.</i></p>	2
GB117	<p>Land west of Wrotham Road (Site B), Hook Green, Meopham North 3.98 ha – 120 dwellings</p> <p>A site with presently unknown archaeological potential which has been cultivated for many years.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	3/4
GB134	<p>Wickes Site, Stuart Road, Gravesend. Pelham 1.29 ha – 365 dwellings</p> <p>Former site of Gravesend West Railway station. The site lies immediately north of an area of prehistoric, Romano-British and early medieval activity and south of the Thames river frontage area. Applications should be submitted with an archaeological desk-based assessment. The setting of nearby designated heritage assets should be considered if tall buildings are proposed.</p>	3

	<i>Development with archaeological measures should be possible on this site.</i>	
GB135	<p>Civic Centre, Windmill Street, Gravesend 0.50 ha – 150 dwellings</p> <p>The site has heritage interest for structures associated with WW2 and Cold War defence. The former in the northern part of the site and the latter within the present Civic Centre. Any application for development should be submitted with the results of an archaeological desk-based assessment, which should include an assessment of historic buildings and structures, setting of St George's Terrace and an impact assessment of basements and other previous below-ground works.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	3
GB136	<p>Parrock Street Car Park, Parrock Street, Gravesend 2.94 ha – 290 dwellings</p> <p>The site has heritage interest for structures associated with WW2 defence to the north and 19th century residential development. The site has been an open car park since the late 20th century and may have below-ground archaeological potential. Any application for development should be submitted with the results of an archaeological desk-based assessment but it is recommended that contact is made with the Kent Historic Environment Record (KHER) for advice as an archaeological desk-based assessment was prepared for the site in 2002 and a copy in lodged with KHER.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	4
GB138	<p>Land at Milton Place, Ordnance Road, Gravesend. Riverside 1.75 ha – 100 dwellings</p> <p>The site has archaeological potential and is within the Riverside Conservation Area. The 19th century Holy Trinity Church was located in the southwest corner of the site. The eastern part of the site was developed in the mid-20th century as a swimming pool complex. The western part of the site may have seen little in the way of below-ground impacts though there are records of WW2 public air raid shelter being located here. The site is immediately adjacent to the scheduled New Tavern Fort and designated Leisure Gardens as well as a number of listed buildings to the west, so consideration of setting issues will be important and early discussions with Historic England will be necessary. Any application should be supported by an archaeological desk-based assessment. Pre-determination field evaluation would also be useful to help inform a planning decision.</p>	2

	<i>Development with archaeological measures should be possible on this site.</i>	
GB143	<p>Gravesham Court, Homemead, Clarence Row, Gravesend. Central 1.12 ha – 80 dwellings</p> <p>The site has unknown but potentially low archaeological significance due to past impacts from mid to late-20th century development replaced the 19th century residential development of the site including the site of the former Christ Church National School on Russell Street.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	4
GB145	<p>St Columba's Close, Gravesend. Westcourt 0.41 ha – 15 dwellings</p> <p>The site is considered to have low archaeological potential due to past impacts and lack of any records of archaeological finds close to the site.</p> <p><i>No archaeological works are recommended.</i></p>	5
GB147	<p>Canal Road, Higham 0.42 ha – 10 dwellings</p> <p>The site has unknown archaeological potential but lies at the margin between alluvial wetlands to the north and drier ground above 5m AOD to the south. These environments have high archaeological potential where alluvial deposits bury and protect former land surfaces on which prehistoric activity took place as well as on the adjacent drier geologies. The alluvial deposits themselves can also contain archaeological remains such as trackways, fish traps and boats. The Thames & Medway Canal which lies to the south-west of the site and whose setting would need to be considered, appears to follow the line of a former channel. The Lower Higham Conservation Area lies to the south and east of the site.</p> <p>Any application for this site should be accompanied by an archaeological desk-based assessment and the results of field evaluation. The latter should be undertaken in consultation with the County Archaeologist at Kent County Council.</p> <p><i>Development with archaeological measures might be possible on this site but would need to be subject to assessment and field evaluation to determine risk and viability.</i></p>	1/2
GB150	<p>Recreation Ground at Mackenzie Way, Gravesend. Singlewell 0.43 ha – 15 dwellings</p>	4

	<p>The area is considered to have prehistoric and Romano-British archaeological potential.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	
GB152	<p>School Close, Hook Green, Meopham. Meopham North 0.59 ha – 15 dwellings</p> <p>The site has unknown archaeological potential limited by past development. The site is presently occupied by small post-WW2 estate.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	4
GB153	<p>Land at Shears Green Community Centre and Lawrence Square, Haynes Road, Northfleet. Coldharbour 0.15 ha – 5 dwellings</p> <p>The site has been previously developed and has low archaeological potential.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	5
GB155	<p>Denton Family Centre, Lower Range Road, Gravesend 0.19 ha – 5 dwellings</p> <p>The site lies on Taplow Gravels which may have Palaeolithic archaeological potential at this location. The site has been previously developed and this will have impacted any below ground archaeological remains to some degree.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	3/4
GB157	<p>Northfleet Youth and Community Centre, Hall Road, Northfleet South 1.55ha – 60 dwellings</p> <p>The site has presently unknown archaeological potential, lying on Thanet Sands. It does not appear from historic mapping that the site has been subject to development but was used as an allotment in the early 20th century. Any application should be submitted with an archaeological desk-based assessment and the results of field evaluation comprising geophysical survey and/or trial trenching.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	3/4
GB158	<p>Social Education Centre, Haig Gardens, Gravesend. Central</p>	3/4

	<p>0.58ha – 25 dwellings</p> <p>Formerly the site of the Milton Barracks Station Hospital, mortuary and other structures. The site was redeveloped after WW2 but may have below-ground archaeological potential.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	
GB160	<p>Land at Station Road, Northfleet North. 0.477ha – 20 dwellings</p> <p>Former Northfleet Station goods depot. The site is mapped as being underlain by chalk, head deposits with the potential for alluvium at the western end of the site. The site may have been embanked when the railway, which runs to the south, was constructed and any below-ground archaeological remains may therefore be well preserved. Any planning application should be submitted with an archaeological desk-based assessment and the results of field evaluation.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	2/3
GB191	<p>Whitehill Playing Field, Whitehill Lane, Gravesend. Whitehill 0.97ha – 40 dwellings</p> <p>Site of the gardens of the former Canterbury House. The site has presently unknown archaeological potential but lies on a gentle slope on chalk which may have favoured past activity. 2nd century Romano-British cremation burials are recorded c.470m to the south-west of the site. Any application should be submitted with an archaeological desk-based assessment and the results of field evaluation comprising geophysical survey and/or trial trenching.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	3/4
GBS-C	<p>Land at and adjoining Buckland Farm, Chalk Road, Higham 1.41ha – 40 dwellings</p> <p>The site has unknown archaeological potential but lies at the margin between alluvial wetlands to the north and drier ground above 5m AOD to the south. The BGS also maps a band of Pleistocene head deposit across the site which may have Palaeolithic archaeological potential. These Holocene deposits have high archaeological potential where alluvial deposits bury and protect former land surfaces on which prehistoric activity took place as well as on the adjacent drier geologies. The alluvial deposits themselves can also</p>	1/2

	<p>contain archaeological remains such as trackways, fish traps and boats. The Thames & Medway Canal which lies to the north of the site and whose setting would need to be considered, appears to follow the line of a former channel. The Lower Higham Conservation Area lies to the east of the site.</p> <p>Any application for this site should be accompanied by an archaeological desk-based assessment and the results of field evaluation. The latter should be undertaken in consultation with the County Archaeologist at Kent County Council.</p> <p><i>Development with archaeological measures might be possible on this site but would need to be subject to assessment and field evaluation to determine risk and viability.</i></p>	
GBS-D	<p>Land to the south of Green Lane and east of Wrotham Road, Hook Green, Meopham North 11.69ha – 350 dwellings</p> <p>The site lies in an area that has seen limited systematic archaeological investigation. The site is on a relatively gentle slope and underlain by Chalk, Thanet Sand and Head deposits. The latter may have Palaeolithic archaeological potential and the site also has general archaeological potential for late prehistoric, Romano-British and medieval activity. The land has been cultivated and aerial photographs indicate below-ground complexity most likely related to geology, drainage and possible past human activity. Given the size of the development site it is possible that presently unknown archaeological remains may be present. Any application should be submitted with an archaeological desk-based assessment and the results of field evaluation comprising geophysical survey and ideally, trial trenching.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	3
GBS-E	<p>Land north of Camer Road, Hook Green, Meopham North. 17.21ha – 520 dwellings</p> <p>The site lies in an area that has seen limited systematic archaeological investigation. The site is on a relatively gentle slope and underlain by Chalk, Thanet Sand and Head deposits. The latter may have Palaeolithic archaeological potential and the site also has general archaeological potential for late prehistoric, Romano-British and medieval activity. The land has been cultivated and aerial photographs indicate below-ground complexity most likely related to geology, drainage and possible past human activity. Given the size of the development site it is possible</p>	3

	<p>that presently unknown archaeological remains may be present. Any application should be submitted with an archaeological desk-based assessment and the results of field evaluation comprising geophysical survey and ideally, trial trenching.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	
GBS-G	<p>Land north of Melliker Lane, Hook Green, Meopham North 5.33ha – 160 dwellings</p> <p>The site lies in an area that has seen limited systematic archaeological investigation. The site is on a relatively gentle slope and underlain by Chalk, Thanet Sand and Head deposits. The latter may have Palaeolithic archaeological potential and the site also has general archaeological potential for late prehistoric, Romano-British and medieval activity. The land was formerly an orchard but has not been cultivated in recent years. Aerial photographs indicate below-ground complexity most likely related to geology, drainage and possible past human activity. Historic mapping shows the line of a former lane called Mouses Lane, which ran north from Melliker Lane. The route of this former lane which had been lost by the late 19th century is within the western boundary of this site. Given the size of the development site it is possible that presently unknown archaeological remains may be present. Any application should be submitted with an archaeological desk-based assessment and the results of field evaluation comprising geophysical survey and ideally, trial trenching.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	3
GBS H	<p>Land between Melliker Lane and Longfield Road, Hook Green, Meopham North 6.05ha – 180 dwellings</p> <p>The site lies in an area that has seen limited systematic archaeological investigation. The site is on a relatively gentle slope and underlain by Chalk, Thanet Sand and Head deposits. The latter may have Palaeolithic archaeological potential and the site also has general archaeological potential for late prehistoric, Romano-British, medieval, post-medieval and modern activity. The land was formerly an orchard but has not been cultivated in recent years. Aerial photographs indicate some potential below-ground complexity, most likely related to geology, drainage and possible past human activity. Given the size of the development site it is possible that presently unknown archaeological remains may be present. Any application should be submitted with an archaeological desk-based</p>	3

	<p>assessment and the results of field evaluation comprising geophysical survey and ideally, trial trenching.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	
GBS K	<p>Land to the north, east and west of Three Crutches. Higham/Shorne, Cobham & Luddesdown 46.23ha – 1385 dwellings and commercial</p> <p>The site lies in an area that has seen relatively little recent systematic archaeological investigation. The site occupies part of a ridge with slopes to the north and east underlain by Chalk and Thanet Formation (sand, clay and silt). There is the potential for unmapped superficial deposits of Pleistocene or early Holocene date, which may contain or cover early prehistoric archaeological evidence. The site also has general archaeological potential for late prehistoric, Romano-British, medieval, post-medieval and modern activity. The land has been cultivated in recent years. Aerial photographs indicate some potential below-ground complexity, most likely related to a combination of geology, drainage and possible past human activity (including possible ring ditches, enclosures, field boundaries and trackway). Given the size of the development site it is possible that presently unknown archaeological remains may be present. Any application should be submitted with an archaeological desk-based assessment and the results of field evaluation comprising geophysical survey and ideally, trial trenching.</p> <p><i>Development with archaeological measures should be possible on some of this site.</i></p>	2/3
GBS L	<p>Rose Farm, Downs Road, Istead Rise 5.5ha – 165 dwellings</p> <p>The site lies in an area that has seen relatively little recent systematic archaeological investigation. The site lies on a north-east facing slope underlain by Chalk and Head deposits. There is the potential for superficial deposits of Pleistocene or early Holocene date, to contain or cover early prehistoric archaeological evidence. The site also has general archaeological potential for late prehistoric, Romano-British, and medieval activity. It is possible that presently unknown archaeological remains may be present. Any application should be submitted with the results of an archaeological desk-based assessment and the results of field evaluation comprising geophysical survey and ideally, trial trenching.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	3/4

<p>GBS P</p>	<p>Land to the east and south of Lomer Farm, Wrotham Road. Meopham North 3.83ha – 115 dwellings</p> <p>The site lies in an area that has seen relatively little recent systematic archaeological investigation. The site lies on a north-west facing slope underlain by Chalk, Thanet Formation, Head deposits and Clay with Flints. There is the potential for the superficial deposits of Pleistocene or early Holocene date, to contain or cover early prehistoric archaeological evidence. The site also has general archaeological potential for late prehistoric, Romano-British, and medieval activity. It is possible that presently unknown archaeological remains may be present. Any application should be submitted with the results of an archaeological desk-based assessment and the results of field evaluation comprising geophysical survey and ideally, trial trenching.</p> <p><i>Development with archaeological measures should be possible on this site</i></p>	<p>3/4</p>
<p>GBS R</p>	<p>Cascades Leisure Centre, Thong Lane, Shorne Riverview 5.61ha – 170 dwellings</p> <p>Recent archaeological investigations in this area for the proposed Lower Thames Crossing (LTC) have demonstrated archaeological potential for all periods from Palaeolithic to the present day. The site lies on chalk and modern development will have impacted to some extent on any below-ground archaeological remains present at the site.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	<p>4</p>
<p>GBS T</p>	<p>Land between Lower Rochester Road, Hermitage Road and School Lane, Higham 2.768ha – 85 dwellings</p> <p>The site lies in an area that has seen relatively little recent systematic archaeological investigation. The site lies on a north facing slope underlain by Chalk and Head deposits. There is the potential for the superficial deposits of Pleistocene or early Holocene date, to contain or cover early prehistoric archaeological evidence. The site may also have general archaeological potential for late prehistoric, Romano-British, and medieval activity and it is possible that presently unknown archaeological remains may be present. The land has been cultivated in recent years. Aerial photographs indicate some potential below-ground complexity, most likely related to a combination of geology, drainage and possible past human activity. Any application should be submitted with the results of an archaeological desk-based assessment and the results of field evaluation</p>	<p>4</p>

	<p>comprising geophysical survey and ideally, trial trenching.</p> <p><i>Development with archaeological measures should be possible on this site</i></p>	
GBS UA	<p>Canal Road/Norfolk Road Gravesend. Riverside 6.07ha – 1460 dwellings and commercial</p> <p>The site has archaeological interest related to its position close to the River Thames and the site's industrial heritage related to the Canal Basin and the Thames and Medway Canal. The site is underlain by Holocene alluvium which may cover and/or contain archaeological and palaeoenvironmental remains. The site has been developed and this will have impacted to some extent on any below-ground archaeological remains. Any application for development of the site should be submitted with an archaeological desk-based assessment and the results of field evaluation (which include a watching brief on any ground investigation studies and/or purposive geoarchaeological boreholes).</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	2/3
GBS W	<p>Land between Taylors Lane and School Lane, to the north of High View, Higham 8.295ha – 250 dwellings</p> <p>The site lies in an area that has seen relatively little recent systematic archaeological investigation. The site lies on a north facing slope underlain by Chalk, Thanet Formation and Head deposits. There is the potential for the superficial deposits of Pleistocene or early Holocene date, to contain or cover early prehistoric archaeological evidence. The site may also have general archaeological potential for late prehistoric, Romano-British, and medieval activity and it is possible that presently unknown archaeological remains may be present. The land has been cultivated in recent years and some areas were formerly orchards. Aerial photographs indicate some potential below-ground complexity, most likely related to a combination of geology, drainage and possible past human activity. Any application should be submitted with the results of an archaeological desk-based assessment and the results of field evaluation comprising geophysical survey and ideally, trial trenching.</p> <p><i>Development with archaeological measures should be possible on this site.</i></p>	3/4

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LOCAL PLAN REVIEW

REGULATION 18 PREFERRED APPROACHES CONSULTATION DEC 2020

RESPONSE FORM



REGULATION 18 PREFERRED APPROACHES CONSULTATION DEC 2020

Response form

***Name:**

Organisation (optional):

Client (optional):

***Address:**

Email:

*Please note: we are unable to consider your comments unless these details are fully completed.

How should I complete the form?

You can complete the form online (<https://maidstone-consult.objective.co.uk/portal/>) downloading and printing the form.

Who should I send it to?

If possible please return your completed form by email to **ldf@maidstone.gov.uk**. However if this is not possible please return your completed form to **Strategic Planning, Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent, ME15 6JQ**. Responses must be received **by 5pm on Tuesday 22nd December**.

How will you use my data?

All consultation comments will be made publicly available on the consultation portal (<https://maidstone-consult.objective.co.uk/portal/>) in due course. This is so that interested parties can view all the responses that have been received. Published information will include the comment and responder name. All demographic and contact data will be removed. All data is processed in accordance with the Data Protection Act 2018. The consultation responses will be used to inform the next stages of the Local Plan Review.



For each matter that you wish to comment on, please indicate which part of the document you are referring to (e.g. paragraph, policy, map or figure) and explain why you agree or disagree with the approach that is proposed:

[A large, empty grey rectangular area intended for user input.]

About you

Maidstone Borough Council is committed to Equal Opportunities. The information you provide in this section will not be linked to any comments you make on consultation and you will not be linked to your name, address or other personal identifier. The information will be used for monitoring purposes only.

1. Are you...

Male

Female

Other – please state

2. Which of the following age group do you fall into?

17 years and under

18-24

25-34

35-44

45-54

55-64

65-74

75+

3. Which of the following best describes your race or ethnicity

White (English/Welsh/Scottish/Northern Irish/British/Irish/Gypsy/Irish Traveller)

Black/Black British (African/Caribbean)

Asian/Asian British (Indian, Pakistani/Bangladeshi/Chinese)

Mixed (White & Black Caribbean/White & Black African/White & Asian)

Other - please specify

4. Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?

Yes

No

Prefer not to say

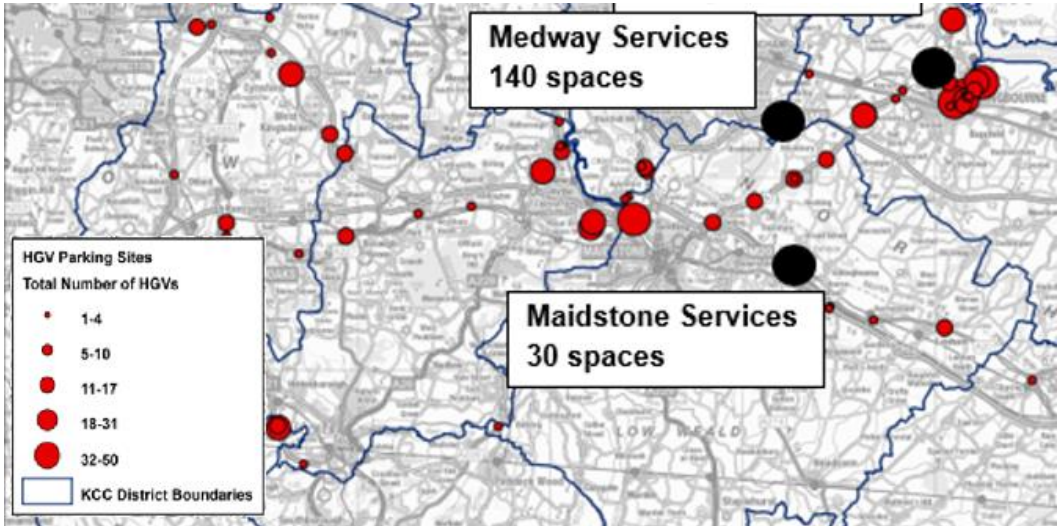
Policy / paragraph	Commentary
Chapter 1 Introduction	
	<p>The County Council, in its response to the previous Regulation 18 (1) consultation, emphasised its concern over the quantum of development that Maidstone Borough Council is having to plan to deliver as an output from the Government' standardised methodology for assessing housing needs. In that context, KCC acknowledges and supports the efforts being made by the Borough Council to take advantage of the transition period proposed by the government ahead of the introduction of any further proposed changes to the methodology, to allow the Borough Council to plan for the lower number of 1,214 homes a year (instead of 1,568 homes a year).</p> <p>The County Council recognises that to achieve this, the timetable for producing the review of the adopted Local Plan 2017 has been brought forward and has resulted in a three-week consultation for this Regulation 18 Preferred Approaches consultation. KCC has provided full comments on the Local Plan consultation below but given the timescales involved, would highlight the need for full coordination and further engagement on emerging site allocations and the range of wider strategic issues where further assessment is required.</p>
Chapter 3 Spatial Portrait & Key Local Issues	
Spatial Portrait & The LPR's Strategic Issues	<p>Heritage Conservation: There are five Registered Parks and Gardens in Maidstone Borough and the assets listed in this paragraph are not all built assets and include archaeological sites and landscapes. The County Council would therefore recommend that the first sentence of paragraph 3.9 is amended to "<i>The Borough is fortunate to benefit from a number of <u>heritage</u> and natural assets</i>".</p> <p>Within the Local Plan Review paragraph 3.11, the strategic issue identified for heritage is limited to "<i>Ensuring that the borough's historic assets are conserved and managed</i>". The County Council notes that other environmental issues listed are presented more positively. The County Council would therefore recommend the following amendment: "<i>Ensuring that the borough's historic assets are conserved and enhanced</i>".</p>
Progress on Neighbouring Authority Plans	<p>The County Council would welcome discussions with the Borough Council on compiling of a Statement of Common Ground (SoCG) to ensure that relevant matters which relate to the County Council's role are picked up as part of the Local Plan Review process. Engagement is required to ensure the relevant local and strategic infrastructure is in place to support the growth strategy proposed in this Review.</p> <p>The County Council would recommend that all relevant strategic cross-boundary issues are captured in an SoCG with KCC, to include transport, waste infrastructure, community infrastructure, education and climate change mitigation and adaptation. The County Council would make the following observations in relation to Table 3.2 "Cross Boundary Issues". KCC notes recognition of historic assets and risk of flooding and would also request engagement on these matters.</p> <p>The County Council encourages the importance of the Local Plan review process to focus on a place-making approach that puts infrastructure first. This will ensure that planned residential and commercial growth will deliver high quality and sustainable developments and provide opportunities for local people. This "Infrastructure First" approach is embedded in the Kent and Medway Infrastructure Proposition, a deal with Government for new infrastructure investment that will enable accelerated housing delivery, which is focussed on building the right homes in the right places and providing the public services, transport infrastructure, jobs and homes that residents will need now and in the future.</p>

Policy / paragraph	Commentary
Chapter 4 Spatial Vision and Objectives	
Local Plan Spatial Vision	<p>Air quality: The County Council supports the commitment for developments within, and with the potential to, adversely impact the borough’s AQMA to be required to mitigate their impact, having regard to both on-site design and travel patterns and modes of travel. The recognition of the need for ‘tackling congestion and air quality issues through improvements for vehicles, pedestrians and cyclists, including public transport’ in achieving the Maidstone Town Centre 2050 Vision is also welcomed.</p> <p>Easing congestion on Bluebell Hill and improving the junctions should improve air quality as Bluebell Hill is a hotspot.</p> <p>Resilience and Emergency Planning: Consideration of the need for spaces to adapt to the challenges presented by climate change will be important, as well as exploration of ‘cool towns’ principles, to inform the design of the public realm. Consideration of flood risk and biodiversity opportunities for the River Len should feature.</p> <p>Heritage Conservation: In respect of paragraph 4.2, the County Council welcomes the addition of the protection of heritage to the Spatial Vision.</p>
Chapter 5 The Borough Spatial Strategy	
SS1 The Borough Spatial Strategy	<p>It is understood that, of the total additional 5,790 homes to be planned for, a total of 1,966 homes would be provided in Maidstone County Town, 2,700 homes would be delivered in the two garden settlements (with a total of 1,700 homes in the settlements, once fully built out beyond the Plan period) and the remaining 1,124 homes being built in Rural Service Centres (467 homes), Larger Villages (353 homes) and Smaller Villages and the Countryside (304 homes). The County Council provides commentary in respect of these locations and relevant policies below.</p> <p>The County Council, as key infrastructure provider supports an ‘Infrastructure First’ approach to growth, where infrastructure is planned for and delivered in a timely manner, ahead of residential development where necessary. In general, critical mass through large scale developments offers the most effective opportunity to provide infrastructure to support growth. The County Council therefore continues, in principle, to be supportive of the progression of garden settlement options. Engagement with the County Council at the earliest opportunity will be critical in ensuring that all the necessary KCC community infrastructure and services are incorporated into the master-planning to deliver sustainable growth. The County Council would welcome discussions with the Borough Council at the earliest opportunity on the proposals for growth.</p> <p>As a key infrastructure provider, KCC would like to be involved in any master planning discussions at an early stage to ensure the necessary infrastructure is planned from the outset, and the impact of development.</p> <p>Any infrastructure enhancements required as a result of growth within the Borough must be wholly funded through developer contributions. It will be essential for the funding mechanisms required for infrastructure requirements to be established at the outset, and this must underpin the initial discussions on all growth options, to ensure that prospective site allocations are genuinely viable and deliverable (<i>further comments are provided at SP13: infrastructure, below</i>).</p> <p>The County Council supports the commitment in Policy SS1 that infrastructure schemes that provide for the needs arising from development will be supported and that new development will be supported if sufficient infrastructure capacity is either</p>

Policy / paragraph	Commentary
	<p>available or can be provided in time to serve it. KCC would welcome continued discussions with the Borough Council on the use of section 106 agreements to secure the delivery of infrastructure on strategic level sites, as opposed to the Community Infrastructure Levy (CIL). This will provide more certainty around funding and delivery of the required infrastructure, ensuring it is delivered in a timely manner as it is required by a new community.</p> <p>Highways and Transportation: The County Council, as Local Highway Authority, is working closely with the Borough Council on the transport considerations for the Local Plan Review. This is mutually beneficial, as delivery of a successful transport strategy that enables growth whilst preserving, and seeking to enhance, the functionality and capacity of the transport network requires close collaboration between the Local Highway Authority and Planning Authority.</p> <p>In respect of the spatial strategy (and the proposed site allocations set out in Chapter 8), it is noted that the strategy is broadly consistent with the recommendations put forward by KCC as part of its response to the Regulation 18(1) consultation. KCC requested that all opportunities were explored to utilise the potential for Garden Communities and larger strategic allocations to achieve the critical mass needed to create self-contained communities. Such an approach enables significant mitigation measures to be provided and reduces the dependency on smaller scale sites in less accessible locations, where there is less scope to secure transport network improvements.</p> <p>The proposed spatial strategy is also broadly consistent with the recommendations provided by within the Transport Modelling Stage 1 Technical note, which recommended a “move away from reliance on Rural Service Centres and Larger Villages” and continued to advise that, overall, the scenario “strikes the balance between allocating sites within Maidstone Town Centre ... and the Garden Settlement sites” (Conclusions and Next Steps, page 66).</p> <p>The pattern of site allocations proposed is generally consistent with this advice; however, it is important to note that the consultation document does still include allocations in the Rural Service Centres and Larger Villages. Careful consideration must be given to constraints on the highway network in those areas.</p> <p>The County Council, as Local Highway Authority is also supportive of the intention to focus growth on Maidstone Town Centre, where there are greater opportunities to encourage sustainable travel behaviours due to the close proximity to key facilities and public transport hubs. Town centre growth is dependent on sustainable transport options.</p> <p>Consideration must be given to the constraints that currently exist on the highway network. These constraints are experienced across the Borough, as many of the principal road corridors are affected by congestion over prolonged periods; however it is most pronounced in the Maidstone urban area. In many cases, the built-up nature of the surrounding environment will prevent or limit the scope for road capacity improvements to be implemented. It is imperative that growth is directed to locations where sufficient network capacity can be made available, rather than simply worsening road conditions on corridors where the impacts cannot be fully mitigated. Because of this, KCC as Local Highway Authority does have serious concerns in relation to a number of the proposed allocations, particularly the relatively significant number proposed towards the south east of the urban area, where the scope for further capacity upgrades on the A229 and A274 is very limited.</p>

Policy / paragraph	Commentary
	<p>The safeguarding of land for a potential Leeds Langley Relief Road is welcomed in that it ensures the delivery of such a road will not be prejudiced by future development. The County Council remains willing to play its part in the ongoing discussions with Maidstone Borough Council, landowners and developers in exploring how housing growth could facilitate provision of the road.</p> <p>Education:</p> <p><u>Primary Education:</u> The County Council, as Education Planning Authority, has provided comments in respect of primary provision within commentary regarding Policy SP1, 3, 4(a), 4(b), 6 and 7.</p> <p><u>Secondary School Provision:</u> Given the strategic nature of secondary provision, commentary is largely provided within this Policy. The proposed spatial distribution presents a challenge for secondary school provision. In total, an additional 8FE of provision would be required to accommodate growth within the Plan period and 13FE of provision to accommodate all growth identified in the proposed Local Plan Review, i.e. with the total garden settlement capacities of 7,000, that will be delivered beyond the plan period.</p> <p>In particular, the growth identified for Maidstone Town will be challenging to mitigate. Approximately 4FE of provision would be required to meet the growth in Maidstone Town. Providing this through expansions of existing schools is likely to be very challenging given the limited scope for existing schools to expand, nor does it represent a level of demand that would sustain the establishment of a new secondary school within the town.</p> <p>Within the plan period, an additional 4FE of secondary demand would be generated by development outside of Maidstone Town. There may be scope for the Lenham School to expand by up to 2FE, but a significant element of growth outside of Maidstone Town is likely to place additional demand on Maidstone Town schools.</p> <p>The establishment of a new secondary school to support growth at Heathlands will be necessary and a significant amount of work will need to be undertaken to identify how development in and around Maidstone and the Regional Service Centres could be accommodated. This may include the need for an additional secondary school to be established within the Maidstone urban area.</p> <p>Provision and Delivery of County Council Community Services: There is need to ensure that all growth is delivered with an appropriate range of community facilities, including Early Years provision, Youth Services, Adult Social Care, Community Facilities and Social Services. The County Council would welcome the opportunity for continued working as the growth strategy for the Borough is progressed to ensure that for each emerging site allocation, an adequate level of infrastructure is delivered alongside development.</p> <p>Sustainable Urban Drainage Systems (SuDS): The Department for Environment, Food and Rural Affairs (Defra) is currently undertaking a review of the Non-Statutory Technical Standards for Surface Water Drainage, which guides how Lead Local Flood Authorities review drainage strategies submitted for new major development. The revisions are likely to require more in relation to multi-functionality of the drainage systems, specifically in relation to biodiversity and amenity and promoting the use of rain-water harvesting. This will require that KCC as Lead Local Flood Authority</p>

Policy / paragraph	Commentary
	<p>ensures that drainage strategies deliver more as blue-green infrastructure.</p> <p>The Borough Council should ensure that policies in the Local Plan Review concerning site allocations are supportive, and promote delivery of, multi-functional drainage systems. This includes the incorporation of local drainage features within development schemes to promote connectivity and the existing natural environment. It would be beneficial if policies could provide better direction as to the requirements for surface drainage features, specifically in relation to amenity within public open space.</p> <p>It should also be noted that for larger development allocations, Flood Risk Assessments (FRA) will be required due to their site area alone. KCC recommends that policies clearly state that the FRA should also consider surface water drainage provision, contributions to blue-green infrastructure and provision of multi-functional benefits.</p> <p>KCC notes that the Heathlands site is in the Stour catchment and is therefore potentially affected by the nutrient neutrality issue. The County Council strongly supports the delivery of nutrient neutrality on the Stour; the garden settlement offers an opportunity to integrate nutrient neutrality into the masterplan of the settlement in a way that can deliver multiple benefits. This is the approach that is being taken for Otterpool Park by Folkestone and Hythe Borough Council and KCC would strongly support a similar approach.</p> <p>Resilience and Emergency Planning: Development across the Borough should look to incorporate natural climate solutions.</p> <p>Biodiversity: There is need for a strategic consideration of green infrastructure and connectivity between and within all the allocated sites to maintain and improve ecological connectivity throughout the Borough. Sites should not be developed in isolation but should have consideration of other proposed and potential developments, to ensure that areas of green and open spaces and landscaping connect to each other.</p> <p>In respect of net gain, the Kent Nature Partnership (through its Sub-Group) is exploring the potential for a County-wide 20% net gain approach and work is currently being undertaken to demonstrate whether that would be feasible and viable. KCC would recommend close working with the Kent Nature Partnership as the Local Plan Review progresses. The Local Plan Review should aim to be as aspirational as possible and KCC supports the garden settlement policies to incorporate 20% net gain.</p> <p>The County Council has adopted the Biodiversity Strategy, which commits to setting out a five year implementation plan to sit alongside the strategy, with delivery of the targets broken down into smaller, shorter actions to progress towards the 25-year vision. The County Council would recommend that the Borough Council works closely with the Kent Nature Partnership so that the Local Plan can help embed and deliver the Strategy’s ambitions to consider, protect and enhance Kent’s valuable natural capital resource and the services it provides.</p>
<p>Commercial Development Needs</p>	<p>It is noted that the Economic Development Needs Study and the Maidstone Economic Development Strategy are being reviewed and refreshed to feed into the Regulation 19 Local Plan Review. KCC would emphasise the need for all emerging development allocations across the Borough to be supported by provision for local jobs, to ensure that a holistic and sustainable approach is taken to housing and new communities – this will be particularly important for any proposed sites in the Rural Service Centres and other rural locations. Digital infrastructure – including gigabit capable broadband</p>

Policy / paragraph	Commentary
	<p>connections (e.g. full fibre) – will help contribute, as part of sustainable development, to boosting the resilience of the local workforce, allowing them to work flexibly and at home where necessary.</p> <p>The Ministry of Housing, Communities and Local Government (MHCLG) made the following amendment to Paragraph 107 of the National Planning Policy Framework 2019 (NPPF): “<i>Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance.</i>”</p> <p>KCC surveys of overnight lorry parking have determined that the Maidstone area has significant numbers of Heavy Goods Vehicles (HGV) parked inappropriately overnight, (as indicated in Figure 1 below) most notably along the A20 and A249 corridors (data from these surveys can be provided on request). There are also “<i>local shortages</i>” in lorry parking provision with only around thirty spaces at Maidstone Services at Junction 8 of the M20 (the nearby Medway Services on the M2 in Medway Council’s administrative area provides a greater number [c.140] of spaces). It is reported that the lorry parking area at the Maidstone Services is full most nights and causes localised parking problems when vehicles are rejected from the site.</p> <p>Lorry parking provision at Junction 8 of the M20 is also of strategic importance. This is because it is the start of Operation Stack when there is disruption at the Channel Tunnel and/or Port of Dover, with non-port bound traffic diverted from the M20 at Junction 8 onto the A20, while the coast-bound carriageway of the M20 is used to queue port bound freight traffic. From the end of the EU Departure Transition, (1 January 2021) it will be the start of Operation Brock with a moveable barrier placed between Junctions 8 and 9 on the London-bound carriageway to enable two way contraflow for non-port bound vehicles, while the coast-bound carriageway is used to queue port-bound freight vehicles if there are delays to crossing the international border. This strengthens the case further for additional lorry parking facilities to be provided at Junction 8 to meet the needs of freight drivers who might need to take mandatory breaks before potentially long delays in Operation Brock.</p> <p>Potential impacts on Junction 8 from developments, especially regarding its function for international freight traffic management, will need to be considered.</p> <p><u>Figure 1: Lorry Parking Surveys in the Maidstone Area</u></p> 

Policy / paragraph	Commentary
Chapter 6 Strategic Policies	
SP1 Maidstone Town Centre	<p>Highways and Transportation: The County Council as Local Highway Authority is generally supportive the intention to focus growth on Maidstone Town Centre, where there are greater opportunities to encourage sustainable travel behaviours due to the close proximity to key facilities and public transport hubs. However, as expressed under Policy SS1 above, consideration must be given to the constraints on the network, which are most pronounced within the town centre and urban area, and where in some locations, impacts cannot be fully mitigated. A move towards sustainable transport has to be a priority.</p> <p>Education: The County Council notes that an additional 882 units are proposed in the Maidstone Town (Town Centre Regeneration and Maidstone Urban Area), which would likely place additional pressure for primary school places – this is expected to be at 1FE or 210 places. It should be noted that demand for primary school places in this area continues to be generated by the conversion of employment space to residential through permitted development rights. In order to ensure that all growth is sustainable, the County Council requests that the Borough Council provides an estimation of the total growth expected in the town, and where this is to be located so that infrastructure, in the form of school places, can be planned for the total anticipated level of growth.</p> <p>Whilst Maidstone County Town has many existing primary schools, the scope for existing schools to expand is typically limited due to site constraints; this is particularly true for the schools in the most urban areas.</p> <p>The Local Plan does not identify infrastructure projects to increase the number of school places needed to support growth identified in the town and the associated policies do not reference the need for school places. The County Council requests engagement to appraise infrastructure options - and this may include the need for land to be allocated within the Plan for education purposes.</p> <p>Provision and Delivery of County Council Community Services: From the perspective of delivering KCC community infrastructure and services, the County Council notes that there are an additional 700 homes within the Maidstone Town Centre (with a further 182 homes within the Urban Area), which will generate further pressure on existing services. Within urban locations, current infrastructure provision can often be constrained in terms of expansion opportunities to accommodate additional growth. Collaboration between the County Council, Borough Council and other key infrastructure providers at an early stage will be essential in ensuring that the necessary infrastructure associated with these emerging sites can be made available to support growth – with necessary services and facilities in sustainable and accessible locations. Any infrastructure improvements or new facilities and services required as a result of growth within the Borough must be wholly funded through developer contributions.</p> <p>Waste Management: The County Council, as Waste Management Authority is in the process of commissioning a new additional Household Waste Recycling Centre (HWRC) to be located at Allington, which is due for delivery in the next eighteen months. This will help support projected housing growth within Maidstone Town Centre, as well as that to the west and potentially north. KCC requests that Waste Management facilities are referenced as infrastructure requirements within policy.</p> <p>Heritage Conservation: The County Council notes the lack of objectives that make reference to the town’s physical environment. An attractive town centre can assist in</p>

Policy / paragraph	Commentary
	<p>the delivery of the economic objectives listed. The County Council recommends a new objective is added that commits the Borough Council to ensuring that Maidstone is a physically attractive centre in terms of its environment, built heritage and public realm. In respect of paragraph 3.39, regarding the Town Centre Strategic Vision, the following amendment is recommended:</p> <p><i>“By 2050 a renewed Maidstone town centre will be a distinctive, safe and high quality place that has:</i></p> <ul style="list-style-type: none"> • <i>Retained its best environmental <u>and heritage</u> features, including the riverside, <u>historic buildings</u> and the enhanced public realm”</i> <p>The County Council notes the supporting text recognises the potential for improving the setting and accessibility of Maidstone’s heritage, but there is no corresponding text in the ‘key components’ list. KCC recommends inclusion of the following text:</p> <ul style="list-style-type: none"> - <u><i>Enhancing the built and historic environment of the town so that it has a stronger character for new build to reference in design and materials.</i></u> <p>Resilience and Emergency Planning: Where possible, green spaces must be delivered alongside housing, employment and infrastructure growth. Consideration should also be given to the potential for the removal of manmade obstructions along town centre watercourse (where possible) to support biodiversity connectivity. Consideration must be given to improvements to boost the resilience of local communities to the challenges presented by climate change.</p>
<p>SP3 Development at the edge of Maidstone</p>	<p>Highways and Transportation: As expressed within Policy SS1, the County Council requests that consideration is given to the constraints that currently exist on the highway network – which are most pronounced in the Maidstone urban area. In many cases, the built-up nature of the surrounding environment will prevent or limit the scope for road capacity improvements to be implemented, which can limit opportunities for transport mitigation. Therefore, KCC does have concerns around some of the proposed allocations, particularly the relatively significant number proposed towards the south east of the urban area, where the scope for further capacity upgrades on the A229 and A274 is minimal. The County Council therefore has strong concerns due to the severe congestion issues.</p> <p>Education: The total proposed additional growth of 1,076 units in the edge of Maidstone will generate a cumulative demand of approximately 1.5FE of primary provision. Given the wide geographic spread of these allocations, the additional primary provision would also likely need to be distributed in proportion to the growth. This is likely to require 1FE of additional provision in the south areas of Maidstone through the expansion of an existing school. Additional provision will be needed to support the north and north east allocations (0.5FE), which may need to be considered alongside proposed growth within the town area.</p> <p>Provision and Delivery of County Council Community Services: The County Council understands that, of the additional 1,084 dwellings being proposed in Maidstone Urban Area, 84 homes would be in the north, 250 homes in the South West, 658 homes in the South/South East and 92 homes in the North East. The County Council would request further, ongoing discussions with the Borough Council to assess the potential service pressures from these individual site allocations and to assess the current infrastructure provision and constraints and the mitigation that may be required to ensure that adequate levels of infrastructure can be provided.</p>

Policy / paragraph	Commentary
	<p>Waste Management: The County Council, as Waste Management Authority, has submitted two projects for inclusion in Maidstone’s Infrastructure Delivery Plan to address the proposed growth in the district. Initially, a short-term project is required to expand the existing HWRC at Tovil. A longer- term project is then needed to relocate the HWRC to a larger site to ensure the required capacity to serve all future development is available. With such a weighting of development to the south and east of Maidstone, it will be vital to ensure that the longer-term project and its funding through developer contributions is supported in policy. KCC requests that these infrastructure projects are supported by Local Plan policy and referenced as infrastructure requirements within policy.</p>
<p>SP4 Garden Settlements</p>	<p>Highways and Transportation: The County Council notes the reference to a new M20 motorway junction at Heathlands Garden Settlement (Policy SP4(a)) and a new connection to the M2 at Junction 4 to support Development North of the M2/ Lidsing (Policy SP4(b)) to support the delivery of these garden settlements. The Borough Council will need to engage at the earliest opportunity with Highways England about the feasibility of additional junctions or improvements to the Strategic Road Network (SRN) and in particular, about the operational impacts on Operation Stack / Brock of a new junction between M20 Junctions 8 and 9. The County Council would welcome being part of these discussions to understand wider implications on the local highway network.</p> <p>Full Highways and Transportation comments relevant to the two proposed Garden Settlement allocations are set out below at SP4(a) and SP4(b).</p> <p>Education: Comments relevant to the two proposed Garden Settlement allocations are set out below at SP4(a) and SP4(b).</p> <p>Provision and Delivery of County Council Community Services: KCC supports the objective to establish garden settlements as a model of future delivery, provided that they are suitably located, master-planned and delivered with respect to existing infrastructure and that upgrades to existing infrastructure are properly assessed for their ability to cope with new development. New supporting infrastructure must be appropriate in terms of scale. It is critical that KCC services are considered at an early stage and that they are commensurate with the scale of the development and future proofed to cater for the growing community.</p> <p>Overall, there will need to be a range of policies that look to ensure that the essential infrastructure will be delivered, phased and prioritised to support the significant growth planned at the two garden settlements. The County Council would strongly advocate the need to secure and/or fund all necessary infrastructure through Section 106 and Section 278 legal agreements, to ensure that infrastructure is delivered at the appropriate phases of the developments.</p> <p>The County Council would welcome early engagement with the Borough Council on the type and location of community infrastructure required to support the proposed garden settlements, to ensure that they can be delivered sustainably. Overall, the County Council would welcome a prominent role in the planning of and delivery of garden settlements within Maidstone to ensure that necessary infrastructure can be planned for, funded and delivered in a timely manner.</p> <p>The County Council would also encourage consideration of policy requirements for the consideration of long-term community stewardship options for the developments, to ensure that infrastructure is managed and maintained.</p>

Policy / paragraph	Commentary
	<p>Public Rights of Way and Access Service: The proposed garden settlements would transform the landscape. Local Plan policy must ensure that the garden settlements adhere to good design principles and positively accommodate the Public Rights of Way (PRoW) network. At this stage, the County Council is comfortable that the proposals within the garden settlements (combined with policies SP12 and SP14A) will ensure that new developments will provide opportunities for active travel and outdoor recreation.</p> <p>Waste Management: The County Council, as Waste Management Authority, recognises that garden settlement developments provide an opportunity for new waste infrastructure. The impact of the garden settlements on waste infrastructure and the need for waste infrastructure capacity to support growth must be considered within Local Plan policy and further discussions are encouraged with the County Council on this matter.</p> <p>Digital Connectivity: In respect of paragraph 1g), reference to <i>superfast broadband</i> should be changed to <i>gigabit-capable broadband</i>, as current government policy requires new development to be connected with full-fibre (FTTP) or gigabit capable connections.</p> <p>Heritage Conservation: The County Council recommends the following addition: <i>“The council supports the development of appropriate Garden Community developments, subject to them, as well as having regard to other policies in this Plan: ... h) have regard to the conservation and enhancement of the historic environment”</i></p> <p>Resilience and Emergency Planning: The new garden settlements will need to be delivered to be resilient against the challenges presented by climate change and be designed to be water use and waste water efficient.</p>
<p>SP4(a) Heathlands Garden Settlement</p>	<p>The County Council raises a number of key issues, as set out below, that will need to be addressed /resolved as the Local Plan Review progresses and KCC would welcome continued involvement to ensure that all KCC services and infrastructure considerations are factored in at the early stages of site assessment and development.</p> <p>The commitment to infrastructure delivery will be critical to the acceptability of the scheme. All County Council services and infrastructure must be captured in the planning, phasing and delivery of a new settlement in this location, to ensure that services are funded, delivered to a high standard and well maintained in the long term. In recognition of both the scale and complexity of this project, the County Council would look to contribute effectively to detailed negotiations and would expect to be a signatory to a section 106 agreement as part of any future planning application.</p> <p>Highways and Transportation: The County Council notes that this policy sets out a number of items indicative of the transport strategy for this site under point 7. KCC as the Local Highway Authority has the following comments to make in regard to these proposals:</p> <ul style="list-style-type: none"> a) Providing a new rail station with a Garden Settlement site would generate sustainable transport opportunities; however, KCC has concerns over deliverability, especially in terms of the cost and complexity in delivering new railway infrastructure, and the impact of increased journey times caused by an additional stop for passengers on existing services. KCC strongly recommends

Policy / paragraph	Commentary
	<p>that Maidstone Borough Council engage with Network Rail to undertake a feasibility study at the earliest opportunity to establish whether this proposal is deliverable and, if so, in what timescales. KCC requests engagement on the prospect of a new station to support this development.</p> <ul style="list-style-type: none"> b) It is likely that the proposed two new A20 junction accesses can be achieved in terms of layout. KCC does have concerns as to whether other key junctions on the A20 corridor, particularly on the approach to M20 Junction 8, have capacity to cater for the likely traffic impacts and this will need to be assessed. c) The provision of new and improved bus services is supported and the site could realistically provide a significant investment to support journeys by bus. d) Good quality walking and cycling connections to shops, schools and other facilities can be provided from the outset within the site and connections outside the development should also be considered. e) A new motorway junction in close proximity to the site would reduce the impact on local roads; however, KCC has concerns over the funding and time scale to deliver such infrastructure which would come forward in the latter stages of the development and the overall likely impact of increasing car trips compared to journeys by rail and bus. <p>The Heathlands Garden Settlement development is still at a conceptual stage and the details that would enable the Local Highway Authority provide a technical assessment in terms of impact and measures required and how these measures could be achieved are expected over the coming months.</p> <p>Education: The development of 5,000 homes at the Heathlands Garden Settlement would necessitate 7FE of additional primary provision to be established. This would likely be appropriately met through three new primary schools within the development; two at 2FE and one at 3FE.</p> <p>The development, once fully occupied, would also generate a demand for 1,000 secondary school places. This will require the establishment of a new secondary school, which will either be 6FE or 8FE.</p> <p>The draft policy references the establishment of one primary school; this is wholly insufficient. Three primary schools and a secondary school would be required to accommodate the demand generated directly by the development.</p> <p>It is imperative that a masterplan for the total development is created, identifying broad locations for all of the schools that will be required. Paragraph 6.74 indicates that the development could accommodated an additional 2,000 units beyond that outlined in the policy; education provision for the greatest potential of growth should be planned for, and this can then be scaled down as certainty is developed with regards to the total expected level of growth.</p> <p>Minerals and Waste: KCC would draw attention to discussions which have taken place with the Mineral Planning Authority regarding Heathlands site which is affected by the Chapel Farm allocation for soft sand in the recently adopted Kent Minerals Sites Plan, 2020. The Heathlands site is also in close proximity to a number of active mineral sites at Shepherds Farm and Burleigh Farm. Development of the strategic allocation proposed will need to ensure that the mineral reserves allocated in the Kent Minerals Sites Plan 2020 and the safeguarded reserves of other permitted mineral sites in the vicinity are not sterilised. This may have implications for phasing and design. The County Council would welcome ongoing dialogue as the plan work progresses.</p>

Policy / paragraph	Commentary
	<p>Waste Management: The proposed garden settlement allocation at Heathlands is situated on the edge of the Maidstone and Ashford district boundary and for that reason, it has the potential to cause a significant impact upon the KCC HWRC service. As stated, residents of Kent are free to visit whichever KCC HWRC they wish. Unlike the kerbside collections which are district bound, residents tend to choose to visit the HWRC that is the closest and quickest to get to, and most efficient when disposing of their waste. New residents at Heathlands are likely to favour the Ashford HWRC in Brunswick Road as opposed to the existing Maidstone HWRC at Tovil. The Ashford HWRC is both closer in mileage, has better access from the main highway network and is a newer site with a more customer focused layout. Whilst residents are free to choose, the Ashford HWRC is nearing capacity and with projected housing growth in Ashford district, it will not be able to accommodate the additional demand from 5,000 new homes at Heathlands.</p> <p>There is currently no scope to increase the capacity at the Ashford HWRC. KCC has submitted two projects for the Maidstone Household Waste Recycling Centre (HWRC) at Tovil to Maidstone’s IDP, being a short term project to increase capacity at the current location and a longer term project to relocate the HWRC to better serve all Maidstone residents. The project to improve Tovil HWRC in the short term is unlikely to be significant enough to change this behaviour and the only long term solution would be to locate a HWRC closer to Heathlands. However, in doing so, the relocated Maidstone HWRC would then possibly not adequately serve residents of Maidstone. The County Council would request the need to increase HWRC capacity is included in the infrastructure section of Policy SP4(a) for Heathlands Garden Settlement – and that it indicates the need to solve the capacity issue that will be created by this development.</p> <p>Sustainable Urban Drainage Systems: At the Heathlands Garden Settlement, surface water flood risk is associated with the ordinary watercourses that cross the site. The extents of flood risk should be accommodated within any masterplan for development in this area. The County Council, as Lead Local Flood Authority, requests that surface water is considered at early stages of master-planning to allow for SuDS to provide wider multi-functional systems and environmental benefit. A Flood Risk Assessment will be required for this Garden Settlement.</p> <p>Nutrient neutrality: Nutrient neutrality is a potentially substantial constraint on the Heathland Garden Settlement and nutrient neutrality on the River Stour will need to be delivered. Further, KCC would encourage Maidstone to recognise and promote the substantial opportunities this offers to deliver integrated blue/green infrastructure to provide multiple benefits, including high quality amenity, habitat, habitat connectivity, carbon sequestration and potentially reduced water consumption.</p> <p>KCC would encourage Maidstone Borough Council to make nutrient neutrality a more substantial part of the delivery of the garden settlement. At the very least, KCC considers this should also be considered in section 6 Infrastructure, as infrastructure will be required to meet this challenge. KCC also considers the potential scale of the measures and the need to integrate them from the start of planning means it should also be considered in section 4 Master planning and design parameters.</p> <p>Public Health: The County Council notes the requirement in Policy SP4 for both of the Garden Settlements to give residents the best opportunities to follow healthy lifestyles, allowing activity to be built into their daily lives and provide opportunities to buy and grow healthy food along with ensuring that health services are close at hand. This</p>

Policy / paragraph	Commentary
	<p>ambition is strongly supported. If the ambition is to embed health and well-being from the start of development, as indicated in policy SP4, there must be a commitment to public health. The Joint Health and Well Being Strategy (2015 to 2021) ¹ provides further policy context on both the social care and the public health needs that must be considered. In addition, Kent and Medway's Sustainability and Transformation Plan for Kent and Medway² provides further detail.</p> <p>The scheme should incorporate the positive learning from the Healthy New Towns concept, including the experience at Ebbsfleet, North Kent. For example, it should include sufficient focus on the needs of those living within the development with dementia.</p> <p>The provision for delivery of Public Health services, which may include capital build costs for employment and community space, equipment, rent free use of space and initial start-up costs funded by the applicant, should be secured within a section 106 agreement.</p> <p>Sustainable Business and Communities: The development of a new garden settlement at Heathlands presents an opportunity to incorporate high quality sustainable design from the outset and test innovative low carbon energy generation/district heating and transport infrastructure at a community scale. This aspiration should be included within the Local Plan policy.</p> <p>Heritage Conservation: The County Council recommends that, in view of the potential significance of archaeology, clear reference must be made to the historic environment within the policy relating to Heathlands Garden Settlement.</p> <p><i>SP4(a) Heathlands Garden Settlement: Introduction to the Policy/Reasoned justification</i></p> <p>Heathlands contains known significant buried and visible archaeology and has the potential to contain significant as yet unknown archaeology. Of particular note is the site of Chapel Farm which seems to be an Iron Age, Roman and Medieval settlement of considerable regional if not national importance. The important heritage of this garden settlement could play a vital role in the sustainability ethos and providing a distinctive, high quality environment and public realm. It is essential that design and master-planning process utilises evidence-based heritage assessment. To ensure appropriate consideration of the historic environment KCC recommends the following paragraphs is included in within the policy:</p> <p><u><i>Heathlands has a rich and diverse heritage which presents unique opportunities and constraints. It will be important that key parts of the site are carefully designed to ensure appropriate conservation and enhancement of heritage assets to the benefit of the garden village community; their awareness, understanding and enjoyment of the special historic environment here.</i></u></p> <p>4) <i>Master-planning and design parameters:</i></p> <p><u><i>f) Heritage assessment to inform design parameters including specific consideration of Chapel Hill Farm site</i></u></p> <p>The County Council also recommends the following paragraph is deleted and replaced</p>

¹ https://www.kent.gov.uk/_data/assets/pdf_file/0014/12407/Joint-health-and-wellbeing-strategy.pdf

² <https://kentandmedway.nhs.uk/resources/kent-medway-sustainability-transformation-plan/>

Policy / paragraph	Commentary
	<p>with the suggested text below:</p> <p><i>8) Environmental</i></p> <p><i>d) There are several areas of potential archaeological sensitivity across the site, and these should be surveyed to ensure their (west of the site) + other areas</i></p> <p><u><i>9) Heritage</i></u></p> <p><u><i>a) Archaeological Strategy needed for the appropriate conservation, management and enjoyment of the historic environment.</i></u></p> <p><u><i>b) Community Heritage Programme required to ensure the wider social, health and well-being and environmental benefits that conservation and utilisation of heritage on this site can bring to the garden village community;</i></u></p> <p><u><i>c) Chapel Hill Farm safe-guarding zone based on suitable evidence to ensure its conservation and be utilised to the benefit of the community.</i></u></p>
<p>SP4(b) Development North of M2/Lidsing</p>	<p>Highways and Transportation: The County Council notes that this policy sets out a number of items to inform a transport strategy. KCC as the Local Highway Authority has the following comments to make in regard to these proposals:</p> <ul style="list-style-type: none"> a) A new connection to the M2 at Junction 4 would reduce the impact on local roads and exploring this potential is supported. It is important that any such infrastructure is delivered in a timely manner, however, as local roads could be heavily impacted if delivery is delayed or later than is required to accommodate trip generation from the new settlement. b) Improving bus services is supported, however it is noted that this specific route falls mostly within the Medway area and Medway Council will have detailed views on this proposal. c) As with the Heathlands proposal, good quality walking and cycling connections to shops, schools and other facilities should be provided from the outset within the site and connections outside the development should also be considered. d) This item does not appear to directly link with the North of M2 site. While new motorway links play a strategic role, it would not be a mitigation measure for the specific impacts of this proposal. <p>The North of M2 development is still at a conceptual stage and the details, which would enable KCC officers to provide a technical assessment in terms of impact and measures required and how these measures could be achieved, are also expected over the coming months.</p> <p>Education: The development of 2,000 homes would necessitate the establishment of a new primary school; this should be designed for a total capacity of 3FE.</p> <p>There are no existing schools within the KCC area that could serve this development. This will present a challenge in the early years/phases of the development. In these years the demand would not be high enough to sustain a new primary school and pupil pressure will fall within the Medway area. Significant engagement and coordination work will be required with Medway Council and KCC to identify the school provision challenges of development in this area before the Local Plan progresses further.</p> <p>Provision and Delivery of County Council Community Services: The County Council emphasises the need for engagement between KCC, Medway Council and the Borough Council in ensuring that the relevant community infrastructure is available to meet the needs of the new community.</p>

Policy / paragraph	Commentary
	<p>Waste Management: The proposed garden settlement at Lidsing is in very close proximity to Medway Council administrative area and Medway Council's HWRC at Capstone. Although KCC currently has an agreement for Kent residents to use Medway facilities, the capacity of their sites as well as the longevity of this agreement are unknown. However, if access to the Capstone site was not permitted in the future then access to the KCC site in Tonbridge and Malling or Maidstone should still be sufficient if contributions are received to enable the longer term Maidstone HWRC project. As with the Heathlands Garden settlement, the County Council would welcome the inclusion of waste infrastructure requirements in section 6 of Policy SP4 (b). Duty to cooperate conversations with Medway Council and KCC will be critical.</p> <p>Heritage Conservation: The County Council recommends the following amendment: <i>e) Archaeological assessment.</i> <i>c) <u>Archaeology Strategy needed for the appropriate conservation, management and enjoyment of the historic environment of Lidsing Garden Village</u></i></p>
<p>SP5(a) Potential Development in the Leeds-Langley Corridor</p>	<p>Highways and Transportation: It will be essential to attain clarity on the design and construction costs associated with the road and the level of housing growth that may be required to secure the funding necessary for delivery. This, in turn, will enable the merits of a road-based intervention to be compared against any alternative transport proposals that may come forward for this geographical area.</p> <p>Heritage Conservation: This area contains very sensitive heritage including designated heritage assets. Consideration of the development options need to be fully informed by Archaeological and Archaeological Landscape Assessments, adhering to national guidance as appropriate including the Design Manual for Roads and Bridges. The County Council recommends the following inclusion within the policy: <u>Historic environment assessment will be used to inform decisions on development within the Leeds-Langley Corridor</u></p>
<p>SP5(c) Lenham broad location for housing growth</p>	<p>Sustainable Urban Drainage Systems: At Lenham, surface water flood risk is associated with the ordinary watercourses which cross the site. The extents of flood risk should be accommodated within any masterplan for development in this area. The County Council, as Lead Local Flood Authority, requests that surface water is considered at early stages of master-planning to allow SuDS to provide wider multi-functional systems and environmental benefit. A Flood Risk Assessment will be required for development in Lenham.</p> <p>Heritage Conservation: As Lenham has known significant archaeology and the potential for as yet unknown significant archaeology, heritage must be considered during design and development in Lenham. As such, KCC recommends the following principle included within Policy SP5(c): <u>11) Protect, conserve and enhance the historic environment appropriate to its significance. Historic Environment Assessment will be used to inform development and identify opportunities to enhance awareness, understanding and enjoyment of the historic environment to the benefit of the neighbourhood and its community.</u></p>
<p>SP6 Rural Service Centres</p>	<p>Education: The proposed levels of growth within Harrietsham, Headcorn, Marden and Staplehurst are individually not of a quantum to sustain new provision or the expansion of existing schools. These areas have typically seen significant levels of growth under the existing Local Plan and school expansions have either been undertaken or are already planned in these areas to accommodate the existing Plan growth. These</p>

Policy / paragraph	Commentary
	<p>expansions may be able to mitigate the proposed levels of additional growth. However, in areas where this is not possible, this could result in a small number of children being required to travel to schools in neighbouring villages. As with the smaller settlements, analysis is required.</p> <p>Heritage Conservation: Harrietsham, Headcorn, Lenham, Marden and Staplehurst are all historic market towns or villages. Below and above ground remains of the past communities survive and it is the historic aspects of these settlements which provide each of their unique sense of place. Respect and retention of the historic character is fundamental to retaining their distinctiveness. As such, KCC recommends the following statement is included within this policy:</p> <p><u><i>4) Protect, conserve and enhance the historic environment appropriate to its significance. Proportionate historic environment assessment will be used to inform development and identify opportunities to enhance awareness, understanding and enjoyment of the historic environment to the benefit of the village and its community.</i></u></p> <p>Employment and jobs: The County Council notes that there will be a need to refresh the Economic Development Needs Study to take into account the impacts of COVID-19 and the changes to the Use Class Order.</p> <p>The Local Plan should be adaptable to accommodate these changing trends in work patterns, as the long-term influence of COVID-19 becomes apparent. Shared workspaces and accessible employment locations have the added benefit of reducing the level of commuting out of the local area. Providing local jobs for residents will be particularly important where new growth is being proposed in the Rural Service Centres, to ensure that growth is sustainable and avoids journeys by private car. Suitable spaces for home working should be designed into new development and this will have positive benefits by boosting the resilience of this sector of the local workforce and their ability to continue working.</p> <p>The rural economy is changing, and the Local Plan Review should look to accommodate this sector as it evolves to meet current and future challenges. To develop a vibrant rural economy that is capable of delivering Net Zero, the Local Plan should support the rural economy in delivering and increasing productivity, employment opportunities and food security.</p>
<p>SP7 Larger Villages</p>	<p>Education: Development in the smaller settlements would need to be assessed on an individual basis, taking into account the locality of each area. In some areas, small elements of growth could act to support the sustainability of small schools; in others, development could add demand on schools in rural areas which could not be accommodated. The County Council requests that these assessments of each area are undertaken prior to the Local Plan progressing to the next stage.</p> <p>Heritage Conservation: Below and above ground remains of the past communities survive and it is the historic aspects of these settlements which provide each of their unique sense of place. Respect and retention of the historic character is fundamental to retaining their distinctiveness. As such, KCC recommends the following statement is included within this policy:</p> <p><u><i>Protect, conserve and enhance the historic environment appropriate to its significance. Proportionate historic environment assessment will be used to inform development and identify opportunities to enhance awareness, understanding and enjoyment of the historic environment to the benefit of the village and its community.</i></u></p>

Policy / paragraph	Commentary
<p>SP8 Smaller Villages</p>	<p>Heritage Conservation: Below and above ground remains of the past communities survive and it is the historic aspects of these settlements that provide each of their unique sense of place. Respect and retention of the historic character is fundamental to retaining their distinctiveness. As such, KCC recommends the following statement is included within this policy:</p> <p><i><u>Protect, conserve and enhance the historic environment appropriate to its significance. Proportionate historic environment assessment will be used to inform development and identify opportunities to enhance awareness, understanding and enjoyment of the historic environment to the benefit of the village and its community.</u></i></p>
<p>SP9 Development in the Countryside</p>	<p>Rural Economy: The phrase ‘traditional land-based activities’ could be open to interpretation and the relevant agricultural, horticultural and vinicultural (etc) sectors should replace this phrase where appropriate. The County Council would also draw attention to the Agriculture Act – which could alter intensive farming practices and place emphasis on farm payments in return for public goods and ensure an increased environmental focus in this sector. The Local Plan Review should take account of changes in farming practices that could result from the Act.</p> <p>Heritage Conversation: The County Council welcomes the commitment to ensure that new development in the countryside is in keeping with the character of existing settlement. It should be noted that development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. Historic England (together with KCC and the Kent Downs AONB team) has published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character of the countryside³. The Kent Farmsteads Guidance has been endorsed by the County Council and it is recommended that the Borough Council considers adopting the guidance as SPD, as part of the Local Plan process. The County Council would be happy to discuss this further.</p> <p>Maidstone contains remnants of significant archaeological landscapes ranging from ancient field systems around historic farm and ancient water systems around mills, to wider scale designed Medieval and Post Medieval parklands and linear Prehistoric and Roman routeways. These all form visible and fundamental components of the countryside. Awareness and conservation of the archaeological landscapes of Maidstone is needed to prevent the erosion of Maidstone’s distinctive rural character. As such, KCC recommends that the following statement is added to policy:</p> <p><i><u>8) Protect, conserve and enhance the historic environment and archaeological landscapes appropriate to its significance. Proportionate archaeological landscape assessment will be used to inform development and identify opportunities to enhance awareness, understanding and enjoyment of the historic environment to the benefit of the community.</u></i></p>
<p>Chapter 7 Thematic Strategic Policies</p>	
<p>SP10(c) Affordable Housing</p>	<p>The County Council set up an Affordable Housing Select Committee in 2019 to determine whether KCC can play a greater role in maximising the development of affordable housing in Kent. The County Council will welcome continued engagement with key stakeholders, including the Borough Council, in respect of ensuring that all</p>

³ <http://www.kentdowns.org.uk/publications/kent-downs-aonb-farmstead-guidance>

Policy / paragraph	Commentary
	residents have an opportunity to live in good quality affordable housing.
SP10(d) Gypsy & Traveller Site Allocations	Gypsy and Traveller Service: The County Council notes that the Local Plan Review sets out that a new Gypsy, Traveller and Travelling Showpeople Development Plan Document (DPD) will be created to manage emerging identified need. The County Council would advise that any allocated Gypsy and Traveller sites identified though the DPD will need to take into account of whether they are in locations that have good local connections (whether in urban or rural areas) and with careful consideration of their integration with existing communities. The County Council's Gypsy and Traveller Service would welcome further engagement on this DPD will seek to meet the needs of the Gypsy, Traveller and Travelling Showpeople in the Borough.
SP11 Economic Development	<p>It is noted that the early implications of COVID-19 and the EU departure have been considered in the Local Plan Review and that there is considerable uncertainty about the role of employment land and floorspace, which is tied up with patterns of home working and improved telecommunications infrastructure.</p> <p>The impact of COVID-19, both in the long and short term, should be fully considered within the Local Plan. Although the long-term impacts are unclear, there may be a shift in the demand for office spaces - which could potentially be replaced with demand for shared workspaces. The Local Plan should be adaptable to accommodate these changing trends in work patterns, as the long-term influence of COVID-19 becomes apparent and will be likely to shape the future of town and village centres.</p> <p>As well as boosting improvements to information and communications technology as promoted within point 6 of Policy SP11, suitable spaces for home working should be designed into new development and this will have positive benefits by boosting the resilience of this area of the local workforce and their ability to continue working.</p>
SP11(a) Retention of Employment Sites	The County Council notes that in paragraph 7.45, the Local Plan Review identifies a need to ensure additional employment floor space is provided across the borough so employment sites will not be released at this time. Employment opportunities must be made available, in accessible locations, to meet the needs of the current local workforce, as well as the future workforce resulting from growth in the Borough.
LPRSA273 Land between Maidstone Road and Whetsted Road	Sustainable Urban Drainage Systems: The County Council notes that this site, which is proposed for employment space, is severely constrained due to extents of flood risk and the exception test may not be met. There is a preference for development to be outside areas of flood risk and KCC, as Lead Local Flood Authority, requests that further review and consultation with the Environment Agency is carried out ahead of progressing with this site.
SP12 Sustainable Transport	Strategic Transport: With reference to paragraph 7.88, the County Council advises that the reference to the Rail Action Plan for Kent should be updated to refer to the draft Kent Rail Strategy for 2021. This updated Strategy underwent public consultation in autumn 2020 and is expected to be agreed by KCC's Cabinet in early 2021, after which it will supersede the quoted Rail Action Plan for Kent of 2011. Paragraph 7.88 should clarify that the draft Kent Rail Strategy for 2021 sets out the County Council's objectives for the next South Eastern concession agreement, now expected to commence in 2023 at the earliest. The reinstatement of services between Maidstone and the City of London is one of the strategy's top priorities. It also recognises the need for the level of rail fares charged in Kent to offer better value for money, by linking any future rail fare increase to consumer price index (CPI) rather than retail price index (RPI). The strategy calls for greater availability of Smartcard ticketing,

Policy / paragraph	Commentary
	<p>offering combined bus and rail travel in Kent, similar to Transport for London's Oyster card.</p> <p>KCC recommends consideration that there may be future mitigations to M20 Junction 6 (A229) as part of the potential Large Local Major (LLM) scheme for the A229, for which KCC is bidding to the Department for Transport (DfT) for funding. This scheme is required not only to address existing congestion and planned local growth, but also to address forecast increased traffic as a result of Highways England's Lower Thames Crossing (LTC) project, which proposes no mitigation for this junction. KCC has commissioned a study of the traffic impacts of the LTC on the strategic and local road network, together with proposed mitigation measures. Some of these measures may become part of KCC's requests to Highways England through the LTC Development Consent Order (DCO) planning process. The County Council, as Local Highway Authority, would welcome further discussions on this matter.</p> <p>Highways and Transportation: The County Council welcomes the partnership with the Borough Council to date regarding this Local Plan Review and through this engagement, suitable highways mitigation can be designed, planned and agreed at Local Plan policy stages to ensure growth can be delivered sustainably.</p> <p>The County Council, as Local Highway Authority, considers that the proposed approach to highways and transport mitigation recognises the need for impacts on the transport network to be properly assessed and tested through transport modelling. It also recognises the need for a combination of carriageway capacity upgrades and sustainable transport mitigations. However, there is concern that there may be an over-reliance within the proposed strategy on the extent to which junction capacity improvements can mitigate the impacts of growth. The County Council is aware that many areas within the Borough have limited scope for significant improvements to junction capacity and therefore it is important that the new or revised Integrated Transport Strategy features a balance of capacity and sustainable transport measures which are developed in collaboration with KCC and other key partners, such as Highways England and public transport operators.</p> <p>One other important point in regard to the planning of mitigation measures, both in terms of capacity improvements and sustainable transport measures, is timing. It is important that any necessary mitigations that are identified can be delivered at the earliest practicable time and before the impacts they are to mitigate against are realised. Ideally, improvements would be in place before first occupation, however this is not always viable and certain measures, like public transport services, may require a "critical mass" of demand to be achieved before they can be introduced. It is therefore of crucial importance that the timing, as well as the viability, of any proposed mitigations is carefully considered.</p> <p>The County Council welcomes the inclusion of the protection and enhancement of PRoW within this policy.</p>
SP13(A) Infrastructure	<p>The County Council considers that sustainable communities are delivered successfully when supporting infrastructure is delivered, where necessary, ahead of housing growth. Taking an infrastructure first approach is key to ensuring that this is achieved. Following this consultation, as a key infrastructure provider, the County Council would welcome continued engagement with the Borough Council in the production of its Local Plan Review, to ensure that an infrastructure first approach is taken to considering the Local Plan strategy and through to the delivery of schemes, to ensure that the necessary infrastructure to support development is adequately funded and</p>

Policy / paragraph	Commentary
	<p>delivered in a timely manner so the ambition of sustainable development is realised during the lifetime of the Plan.</p> <p>Provision and Delivery of County Council Community Services: In order to secure the necessary provision of infrastructure, adequate levels of funding arising from development must be planned for from the outset and secured accordingly. The County Council therefore welcomes the commitment to the use of section 106 agreements to deliver site specific contributions. The County Council welcome a key role in the negotiation of section 106 agreements to ensure they include the necessary KCC infrastructure to support communities.</p> <p>The KCC response emphasises the need for the section 106 mechanism to be used to fund education wherever possible and KCC would want 'education' to be included on the document's priority list alongside adult education, waste and youth services. It is understood that the garden settlements may both be secured through section 106 and this is strongly recommended. The County Council is pleased to see the inclusion of transport, social services and libraries on the residential development priority list (and for transport included on the list for commercial development).</p> <p>The County Council notes that the intention for the CIL to continue to be used to secure contributions towards strategic infrastructure – the County Council requests continued engagement with the Borough Council to ensure that this mechanism provides appropriate levels of funding certainty to support the necessary infrastructure across the Borough to support/deliver the relevant KCC infrastructure to support planned growth.</p> <p>The County Council welcomes the inclusion of Waste within the Social Infrastructure Spatial Topic Paper⁴. Other services, including the range of KCC community services (including libraries, adult education and youth services) do not feature, but contributions will be required.</p> <p>The County Council would also draw attention to the following provisions that will need to be incorporated:</p> <ul style="list-style-type: none"> • All new homes should be compliant with Approved Document Part M4(2). • Community facilities delivered to support growth should be provided with design that is Dementia friendly. • Toilets and changing facilities for the severely disabled will need to be in accordance with the Changing Places specification set out in KCC's Kent Adult Social Services Glossary document dated October 2008 or any successor document or as modified by legislation or best practice or otherwise agreed. <p>Waste Management: KCC as the Waste Disposal Authority is disappointed to see that essential infrastructure to support a sustainable waste management service is not properly assessed in the document. Whilst section 2.19 quotes the NPPF stating that Local Plans should make sufficient provision for infrastructure for a number of services including waste management, this is not followed through in the subsequent chapters of the document, with transportation and utilities being almost the sole focus.</p> <p>KCC as Waste Disposal Authority has highlighted to the Borough Council the importance of ensuring that sufficient waste infrastructure appropriately located to support residents and housing growth is made. The County Council would therefore</p>

⁴ [Social Infrastructure Spatial Topic Paper](#)

Policy / paragraph	Commentary
	<p>like to reiterate the following:</p> <p>KCC operates a network of eighteen HWRCs and six co-located Waste Transfer Stations (WTSs) across the administrative area of Kent. Demand on these sites is at unprecedented levels. As a result of additional demand generated by housing growth, this could result in a requirement to build more, larger sites or invest in the maintenance or repair of existing facilities. There is currently only one HWRC in the Maidstone District, located at Tovil, although residents are permitted to access any KCC HWRC. This site already under significant pressure due to the high number of vehicles entering the site and will be exacerbated further as a result of increased housing growth. Consequently, it is important that the requirement for waste facilities is included within the Local Plan.</p> <p>Heritage Conservation: Growth in Kent, including within the Maidstone Borough will impact on archaeological remains. Irreplaceable archaeological remains constitute a key component in the historic environment of the district being tangible survivals of the County's heritage. The NPPF recognises the importance of this resource within paragraph 199:</p> <p><i>“Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted. Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.”</i></p> <p>After the archaeological work is completed, an archaeological ‘archive’ is created – a sample of the most significant finds and records from the excavation. This archive is what allows the research and community exploitation of the archaeological work. It allows researchers to assess aspects of the excavation even many years after the event. It allows schools and community groups to investigate their local heritage and see the materials that were discovered, even, perhaps, underneath their own homes. The archives are a key method by which the now-lost heritage is connected to the modern community. In most counties in England these archives are deposited in local museums. In Kent, however, most museums are now full, and the archives are left in what are often insecure and inappropriate stores at the archaeological contractors.</p> <p>The need for archaeological storage for these materials, with proper education and access facilities, is critical for the proper exploitation of the heritage of Kent. This need is created almost entirely by development and represents a significant infrastructure requirement that is imposed by developers and for which there are no additional resources. The ongoing costs of the archiving service are met in part by developers on a site by site basis. This does not provide for the initial setup cost, however, nor the facilities for community use, and it is these elements that are appropriate for inclusion within the CIL. A charge should therefore be applied to large-scale development to provide for an archiving service in the county where the archives from Kent can be deposited and where the community can access those materials.</p>
<p>SP14 The Environment</p>	<p>Sustainable Urban Drainage Systems: The reference to green and blue infrastructure within paragraph 7.127 focuses upon the importance of green connectively and provisions. There should be reference to the importance of maintenance of watercourse connectivity and enhancement as well as how new drainage provision can improve and provide other multi-functional benefits, including</p>

Policy / paragraph	Commentary
	<p>water quality protection, amenity spaces and enhanced biodiversity.</p> <p>Heritage Conservation: Geodiversity does not seem to have been considered within the Local Plan Review. It is important that geodiversity is assessed in its own right, but it should also be considered in terms of its links with the historic environment dimension. Geological assets are additionally important where they include fissures or possible cave sites which may contain Palaeolithic remains, for example, within the Loose Valley or areas to the west of Maidstone and also in relation to the character of the built historic environment and the sourcing of traditional building materials.</p> <p>The Local Plan does highlight the importance of Maidstone's historic parks and gardens. If this resource is to play its full role, however, there is a need to ensure an evidence based approach to protecting and where necessary, enhancing these assets.</p> <p>At present, the main information resource for the local (as opposed to Registered) historic parks and gardens of Maidstone is the 1996 Compendium of Historic Parks and Gardens (KCC and the Kent Gardens Trust (KGT)). The Compendium needs reviewing in order to ensure that it is brought up to date and that the significance of the Borough's gardens is properly assessed. Only then can it be used to manage and, where possible, enhance this extremely important resource. KCC has recently been working on a number of such reviews with the KGT and would be happy to discuss an update for Maidstone with the Borough Council.</p> <p>Many of the green and blue corridors are themselves historic routes and contain nationally and locally important heritage assets. For example, during the Second World War, the River Medway was the GHQ Stop-Line and still contains dozens of pillboxes and defence sites. These constitute a nationally important group of heritage assets. They may not be protected in law as protecting complexes such as this is particularly difficult and scheduling is seen as a management decision, but they need to be respected and protected as though they were statutorily protected sites in line with the NPPF.</p> <p>Where the River Len flows into the Medway is a constructed mill pond. It is a landmark feature for Maidstone Town with the reflection of the Rootes building and the industrial historic character being highly memorable. This site is particularly sensitive archaeologically in view of its position within the historic complex of the Archbishops Palace. There may have been a mill here during the Medieval Period, forming part of the medieval palace complex, but certainly post medieval mills were sited here and the adaptation of the River Len channel for industrial use just before it enters the River Medway is of key historic importance.</p> <p>The River Len is also well known for the numerous mills which utilised the healthy flow of the river during the Medieval and Post Medieval periods and perhaps earlier. This distinctive character of the River Len is of special importance within the borough and possibly makes it different to the other minor rivers flowing through Maidstone. An assessment of the heritage of the rivers in Maidstone would be a useful and informative dataset that could help develop the potential of the rivers and enable their effective management.</p> <p>In addition to landscape assessment referred to in paragraph 7.414, a specific historic landscape assessment should be carried out for the Borough. To fully understand landscape character, it is important to consider its historic aspect. This means the pattern of tracks, lanes, field boundaries and other features that comprise the historic character of the modern landscape. The Kent Historic Landscape Characterisation</p>

Policy / paragraph	Commentary
	<p>(2001) has identified the broad historic character of the landscape of Kent. Where it is to be applied locally further study is needed to refine its conclusions, but it remains an essential tool for understanding Maidstone's landscape. Such a more detailed assessment has already been carried out in parts of Kent, such as the High Weald and Hoo Peninsula, and KCC would be happy to discuss such a project with the Borough Council.</p> <p>In respect of paragraph 7.142, SuDS may have both direct and indirect impacts on the historic environment. Direct impacts could include damage to known heritage assets – for example if a historic drainage ditch is widened and deepened as part of SuDS works. Alternatively, they may directly impact on unknown assets such as when SuDS works damage buried archaeological remains. Indirect impacts are when the ground conditions are changed by SuDS works, thereby impacting on heritage assets. For example, using an area for water storage, or improving an area's drainage can change the moisture level in the local environment. Archaeological remains are highly vulnerable to changing moisture levels which can accelerate the decay of organic remains and alter the chemical constituency of the soils. Historic buildings are often more vulnerable than modern buildings to flood damage to their foundations.</p> <p>When SuDS are planned it is important that the potential impact on the historic environment is fully considered and any unavoidable damage is mitigated. This is best secured by early consideration of the local historic environment following consultation with the Kent Historic Environment Record (HER) and by taking relevant expert advice. KCC has recently produced advice for SuDS and the historic environment. It provides information about the potential impact of SuDS on the historic environment, the range of mitigation measures available and how developers should proceed if their schemes are believed likely to impact on heritage assets. This guidance should be considered as part of the Local Plan Review.</p> <p>Sustainable Business and Communities: The County Council is supportive of the strong theme of climate change, carbon emissions and the environment throughout the Local Plan Review within this policy. The County Council would recommend consideration and inclusion of the Energy and Low Emissions Strategy (ELES) within this policy and should address the 2050 targets.</p>
<p>Policy SP14(a) Natural Environment</p>	<p>Public Rights of Way and Access Service: The County Council welcomes inclusion of the PRow with the natural environment with regards to connectivity and accessibility of natural green spaces within the Borough.</p> <p>Biodiversity: The County Council notes that reference has been made to the need for Net Biodiversity Gain but the Local Plan does not detail how much within this policy. This policy should either include the minimal amount of gain which is to be required, or clarify how it will be determined (e.g. by following agreed county approach which is currently being discussed as part of a Sub Group for the Kent Nature Partnership; or set out within a SPD).</p> <p>The policy states that measures should “<i>avoid damage to and inappropriate development considered likely to have significant direct or indirect adverse effects</i>” on designated sites and priority habitats. The County Council recommends that this section of the policy also makes reference to significant / notable populations of species.</p> <p>The County Council further recommends that the policy refers to developments following the mitigation hierarchy.</p>

Policy / paragraph	Commentary
	<p>The County Council is also concerned with the phrase “<i>by incorporating measures where appropriate</i>”. The County Council recommends this is replaced with the phrase <i>where required by the LPA</i>.</p> <p>Point 2 i. of the policy references an “<i>Ecological Evaluation</i>”. However, what the policy is actually making reference to is an Ecological Impact Assessment (EclA). An EclA is a process of identifying, quantifying and evaluating the potential effects of development on habitats, species and ecosystems, so providing all ecological survey information alongside any necessary avoidance, mitigation and compensation proposals within one document. The policy must also include what will happen if appropriate mitigation can be implemented.</p> <p>The County Council would also raise a query on the use of the terminology “<i>Candidate Sites</i>” as this is the terminology usually used for SPA/SACs.</p> <p>Rural Economy: This policy should also consider the potential changes that the new Agricultural Bill could bring forward.</p> <p>Resilience and Emergency Planning: This policy could seek the restoration and reconnection of habitats across the borough and the restoration of lost wildlife.</p>
<p>Policy SP14(b) Historic Environment</p>	<p>Heritage Conservation: At present, the text within the Local Plan, including paragraph 3.9, only reviews the designated heritage assets in Maidstone, focusing on buildings and gardens from the Medieval period onwards. It should be noted that the Kent Historic Environment Record identifies almost 1,000 archaeological monuments in the Borough, dating from the Palaeolithic period (up to 1 million years ago to c. 10,000 BC) to the present day.</p> <p>Lower/middle Palaeolithic handaxes have been found across the Borough, for example at Boxley, Chart Sutton and Marden, and at Boughton Monchelsea the remains of animals that lived alongside the early humans were found, such as cattle, red deer, horse, hyena, mammoth and woolly rhinoceros.</p> <p>Similarly, Mesolithic and Neolithic flints have been found at various places across Maidstone, and flint working sites at Sandway Road, Lenham, Allington and Harrietsham.</p> <p>Fairly extensive Bronze Age evidence has been found across the Borough. Early Bronze Age features were found at Holm Hill in 1999 during A20 diversion works and a late Neolithic/early Bronze Age occupation site was found at Sandway Road, Lenham during Channel Tunnel Rail Links works and at Swadelands School. Two late Bronze Age barrows have been found at Hollingbourne and occupation sites and field systems elsewhere in Maidstone. Bronze Age metal finds of axes, daggers, rapiers and spearheads, as well as metal hoards, have also been found across the area.</p> <p>The most significant site in Iron Age Maidstone was probably the large and well-preserved series of (scheduled) earthworks at Boughton Monchelsea, these may constitute an oppidum or proto town. In addition, numerous examples of late Iron age / early Roman settlements have been found such as at Hockers Lane, Detling, Boarley Farm, Maidstone Hospital and Harrietsham among many others.</p> <p>Maidstone also has an extensive Roman archaeological resource. Roman roads and routeways ran from the Maidstone area south-east to the coast. Several Roman villas</p>

Policy / paragraph	Commentary
	<p>are known from the area such as the Mount Villa, Maidstone and at Teston, Thurnham and East Farleigh and many other rural settlements at Detling, Barming, Harrietsham, Maidstone, Boughton Monchelsea and Ulcombe. Many cremation cemeteries have also been found across the Borough.</p> <p>Anglo-Saxon settlement evidence has been limited in Maidstone, as elsewhere, although occupation features have been found at Boarley Farm and at Glebeland, Harrietsham. Several cemeteries have been found however, at Wheeler St, Maidstone, Thurnham Friars, Lenham and Hollingbourne. This archaeological evidence is a significant part of Maidstone's heritage and should be recognised.</p> <p>The County Council recommends that archaeological evidence in Maidstone must be considered as part of the Local Plan Review to underline the extent and depth of the heritage resource in the Borough. The County Council would also welcome more recent heritage within the Borough being considered; such as the Borough's industrial heritage - in particular, its military heritage in the form of the Second World War GHQ Line with its outstanding collection of pillboxes along the Medway and Detling Airfield with its largely intact defensive system.</p> <p>Although Maidstone's heritage is briefly reviewed within the Local Plan Review, it has greater potential and opportunity to contribute more effectively to the quality of life in the area than is suggested at present. The heritage is complex, however, and needs careful consideration to ensure that the opportunities it presents are not missed and that it is not harmed by inappropriate or poorly planned development. In recent years, KCC has developed a Heritage Strategy for Dover District Council and is currently developing another for Folkestone and Hythe District Council. The goals of these strategies are:</p> <ul style="list-style-type: none"> • To identify and describe the key themes of relevance of the heritage of the district and the heritage assets that represent them • To assess the role that these can play in regeneration and tourism • To identify both their vulnerabilities and the opportunities they provide • To inform site allocations within the district • To support policy development <p>The County Council recommends that the Borough Council needs a similar strategy, which would also be compliant with paragraph 185 of the NPPF which requires local authorities to have a <i>“positive strategy for the conservation and enjoyment of the historic environment.”</i> KCC notes that the draft text indicates that a Heritage Assets Review and Heritage Strategy will be developed at some point in the future. The County Council would recommend that a firm timetable is produced for this Strategy and adhered to.</p> <p>In respect of paragraph 7.145, the current text is satisfactory for its consideration of the impact of the built heritage on Maidstone's character, and the need to conserve and enhance this. The County Council recommend that the text also considers the older heritage of the Borough, which also forms a key component of character. The County Council recommends the following amendments for this paragraph:</p> <p><i>“Maidstone Borough has been shaped and influenced by a long past history, the legacy of which is a strong and rich cultural heritage. <u>In addition to an extensive and important archaeological heritage from prehistory, Roman, Anglo-Saxon and Medieval and later periods,</u> the Borough contains an impressive and visible built heritage resource. Brewing, paper making and shipping along the Medway have been notable</i></p>

Policy / paragraph	Commentary
	<p><i>industrial influences on the borough’s heritage. The borough’s varied geology has been the source of locally distinctive building materials, namely Kentish ragstone, Wealden clay for brick and tile making and oak from the Wealden forests used in the construction of timber-framed buildings and weather boarding.”</i></p> <p>The current text in paragraph 7.174 highlights the importance of designated heritage assets but implies that these are the only significant components of the historic environment – the County Council therefore suggests the following amendment:</p> <p><i>“Collectively these heritage assets contribute to the strong sense of place which exists across the borough. This historic inheritance also has wider economic, social and cultural benefits. The Archbishop’s Palace and Leeds Castle are two particularly high profile examples which help to drive tourism in the borough. Mote Park is a registered historic park which both local residents and visitors value highly as a popular recreational resource. <u>Non-designated heritage assets also play an important role in the historic character of the Borough</u>, and historic features such as buildings, traditional field enclosures and monuments are also integral to the borough’s high quality landscape, particularly enjoyed by users of the borough’s extensive public rights of way network.”</i></p> <p>The County Council would also recommend that the Local Plan Review makes reference to Local Listing. Local Lists are intended to help Local Planning Authority give special regard to assets of local character in their development control decision-making. The Maidstone Borough does have a small number of Locally Listed buildings, but the number has not been added to in some years. Moreover, the only Locally Listed heritage assets in Maidstone are buildings and Local Listing offers an opportunity for the LPA to recognise assets of value from a more diverse range of heritage types including archaeological sites, green spaces and landscapes. The County Council would recommend a commitment within the Local Plan Review to refresh the Maidstone Local List.</p> <p>Paragraph 7.148 states that a ‘heritage assessment’ will be carried out. However, within Policy ENV 1, reference is made to a ‘Heritage Asset Review and Heritage Strategy’. The County Council assumes these are to be the same document and would recommend consistent terminology.</p> <p>In respect of Policy SP14(b) Historic Environment, The County Council considers that the current policy working is limited given the diverse and complex resource as the heritage assets of Maidstone Borough. Ideally, separate policies would be developed for Conservation Areas, Listed Buildings and Archaeology that are suited to managing development that affects these very different asset types. The Local Plan should identify what makes the heritage of the Borough special and explain how the Council will use the policies in the Local Plan to conserve and enhance this significance. It should explain how other policies – such as those on rural development, green space, the natural environment and sustainable design - will respect and take advantage of the historic environment to improve the quality of development in the Borough. In accordance with the NPPF, the Local Plan should take into account:</p> <ul style="list-style-type: none"> – <i>“the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation</i> – <i>the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring</i> – <i>the desirability of new development making a positive contribution to local character and distinctiveness; and</i>

Policy / paragraph	Commentary
	<p>– <i>opportunities to draw on the contribution made by the historic environment to the character of a plan.”</i></p> <p>The County Council provides the following as a draft example policy on Archaeology:</p> <p><u><i>Policy XX</i></u></p> <p><u><i>The Council will promote the enjoyment of Maidstone borough’s archaeological resource through the protection and enhancement of archaeological sites, monuments and historic landscape features, and will seek to encourage and develop their educational, recreational and tourist potential through research, public access, management and interpretation.</i></u></p> <p><u><i>Where possible developers should seek to use Maidstone’s archaeological assets to shape their development proposals, provide interest and character and protect the assets.</i></u></p> <p><u><i>The framework for the management and enjoyment of Maidstone’s archaeological heritage will be is the Maidstone Heritage Strategy (to be adopted in xxxx).</i></u> <u><i>Development proposals affecting heritage assets with an archaeological interest must be accompanied by a desk-based assessment, and if necessary by archaeological fieldwork, that:</i></u></p> <ul style="list-style-type: none"> • <u><i>Characterises the nature, extent and condition of the archaeological deposits in the development area</i></u> • <u><i>Assesses the significance of the deposits and the contribution made by their setting</i></u> • <u><i>Describes and assesses the impact of the development proposals on the archaeological deposits, their significance, and their setting</i></u> • <u><i>Describes how the archaeological deposits will be protected during development. Where this is not possible the assessment should clearly justify why this is not possible and should describe the proposals for mitigating any impacts</i></u> <p><u><i>Development proposals leading to substantial harm to the archaeological interest of designated heritage assets such as Scheduled Monuments, Registered Parks and Gardens, Protected Military Remains or heritage assets of comparable significance will normally be refused.</i></u></p> <p><u><i>Where development proposals affect non-designated heritage assets with an archaeological interest, the Borough Council would expect the archaeological deposits to be preserved in-situ. Where this is not possible clear justification will be required. Where the justification is accepted a programme of archaeological recording may be required to be carried out. The fieldwork will be appropriate to the significance of the archaeological deposits and must be carried out by an appropriately qualified contractor following a written specification agreed by the Borough Council. The programme will include all phases of desk-based and fieldwork, post-excavation analysis, publication of the results and deposition of the site archive in an appropriate repository.</i></u></p>
<p>Policy SP14 (c) Climate Change</p>	<p>Sustainable Business and Communities: The County Council is supportive of the strong themes of climate change, carbon emissions and the environment throughout the Local Plan Review and within this policy, including reference to the Borough Council target for the area to achieve Net Zero by 2030. The County Council also welcomes reference to the ELES within this policy. The County Council encourages</p>

Policy / paragraph	Commentary
	<p>the inclusion of high standards of digital connectivity to reduce the needs to travel, as well as the support for low carbon transport and energy infrastructure.</p> <p>Rural Economy: It should be recognised that climate change and housing growth will put a strain on water resources and certain crops are heavily water dependent. The County Council would recommend consideration on the strain on water resources from additional growth within the Borough.</p>
SP15 Design	<p>Kent Design Guide: KCC would welcome reference to the new Kent Design Guide within the Local Plan, which is due to launch in 2021. The Kent Design Guide is a collaborative initiative, involving a range of stakeholders including Medway Council and all of Kent’s district authorities, with support from the Kent Planning Officers Group and Kent’s Local Authority Chief Executives. It is written to take account of an increasing need to reflect sustainable and environmentally sensible development practices to help Kent and Medway meet Net Zero carbon targets that all authorities in the county have signed up to. The guide provides information on a range of county delivery responsibilities for the built environment, such as Highways and Designing for Movement, but which are of equal importance for Kent’s Local Planning Authorities, including Maidstone. It will be an extremely useful point of reference for inclusion in Maidstone developing Local Plan. There is also a clear point of reference and information to the planning and design policies and principles of each Kent Local Authority, including that of Maidstone. Policy should also promote the role of design as a tool to encourage communities to be active and promote positive health and wellbeing choices.</p> <p>Sustainable Urban Drainage Systems: The County Council recommends that Criteria V1 should reference local watercourses within the natural features for consideration and incorporation.</p>
Chapter 8 New allocations proposed in the Local Plan Review	
	<p>Highways and Transportation: The County Council, as Local Highway Authority, is generally supportive of the intention to focus growth on Maidstone Town Centre, where there are greater opportunities to encourage sustainable travel behaviours due to the close proximity to key facilities and public transport hubs.</p> <p>Consideration should be given to the constraints that currently exist on the highway network. These constraints are experienced across the Borough, as many of the principal road corridors are affected by congestion over prolonged periods, however this is most pronounced in the Maidstone urban area. In many cases, the built-up nature of the surrounding environment will prevent or limit the scope for road capacity improvements to be implemented. It is imperative that growth is directed to locations where sufficient network capacity can be made available rather than simply worsening road conditions on corridors where the impacts cannot be fully mitigated. Because of this, the Local Highway Authority does have concerns around some of the proposed allocations, particularly the relatively significant number proposed towards the south east of the urban area, where the scope for further capacity upgrades on the A229 and A274 is minimal.</p> <p>Given the stage of the Local Plan Review, detailed site-by-site analysis has yet to be carried out. The Transport Technical Note detailing the Stage 1 Modelling project focuses on “hotspots” and “corridors” of congestion and Air Quality impacts, which is the proportionate level of detail for this stage. The Stage 2 Transport Modelling Project will assess in more detail the likely impacts of proposed allocations and that will provide the basis for more granular planning of specific mitigations. As a result, the</p>

Policy / paragraph	Commentary
	<p>County Council is not providing comments on specific proposed allocations.</p> <p>Provision and Delivery of County Council Community Services The County Council would welcome joint working in assessing the impacts on KCC's Community Services as the emerging allocated sites progress, to ensure that an adequate level of infrastructure is delivered alongside development.</p> <p>PRoW: Further, the local site policies highlight specific PRoW, detailing path diversions or enhancements that would be necessary in order for the development to proceed. These policies are welcomed, as they would support the work of the KCC PRoW and Access Service.</p> <p>Minerals and Waste: Attention is drawn to the need to demonstrate compliance with mineral and waste safeguarding considerations as set out in the recently adopted Kent Minerals and Waste Local Plan 2013-30 (as amended by the Early Partial Review, 2020). The consultation submission does not include any assessments of the potential sterilising effect of the allocations on landwon minerals and the potential loss of safeguarded facilities from new development.</p> <p>The relevant policies that are effective are Policy DM 7: Safeguarding Mineral Resources and Policy DM 8: Safeguarding Minerals Management, Transportation, Production and Waste Management Facilities. Both policies are part of the recently reviewed and adopted Kent Minerals and Waste Local Plan 2013-30 (KMWLP). These policies detail how the NPPF requirements for mineral and waste safeguarding can be demonstrated and where appropriate how an exemption from the presumption to safeguard can be invoked.</p> <p>Policy DM 8 is of particular relevance to those allocations that are within 250m of Tovil HWRC, Leeds WWTW and the plant and machinery associated with the operation of Shepherds Farm and Burleigh Farm Quarries.</p> <p>The emerging local plan allocation also affects a number of economic minerals that are safeguarded. They fall into two groups:</p> <p style="padding-left: 40px;">Aggregate forming minerals</p> <ul style="list-style-type: none"> • Superficial deposits- Alluvial and Sub-alluvial River Terrace-Sands and Gravels • Crustal deposits- Folkestone Formation Soft/Silica Sand, Limestone Hythe Formation (hard rock -Kentish Ragstone) <p style="padding-left: 40px;">Non-aggregate forming Minerals</p> <ul style="list-style-type: none"> • Limestone-Paludina Limestone- building stone • Limestone- Hythe Formation (hard rock -Kentish Ragstone-building stone applications exist) • Sandstone- Sandgate Formation (industrial mineral) <p>All the proposed allocations that affect potentially economically viable deposits that are coincident with and come close enough to be considered proximate to should be assessed in accordance with the criteria set out in Policy DM7. The Mineral Planning Authority would welcome and encourage an ongoing dialogue on these matters to aid the Borough Council's understanding of the supply and landbank consideration affecting each economic mineral.</p> <p>As advised above, the Heathlands Garden Community allocation includes land</p>

Policy / paragraph	Commentary
	<p>allocated at Chapel Farm in the adopted Mineral Sites Plan. The mineral within this allocation (3.2million tonnes of Folkestone Formation Soft/Silica Sand) is a critical element of the mineral strategy for Kent and the wider area. The working of the mineral site will be dependent upon the timing and securing of a planning consent and is likely to be required from current land bank considerations towards the end of the 2020's. The exact year will be apparent through yearly assessments of aggregate need via the Local Aggregate Assessment monitoring process. Theoretically if 2027 is the year further reserves are required to maintain the Council's 7-year landbank, the reserves could last until 2037-42. This would need to be considered further in terms of delivery and phasing of the Heathlands allocation such that the mineral reserves are not sterilised.</p> <p>In addition to demonstrating compliance against policy DM7 in relation to the Chapel Farm site, further evidence will be required to demonstrate that the proposed Heathlands allocation will not constrain the operation of the permitted reserves at the neighbouring Shepherds Farm Quarry and the permitted operations at Burleigh Farm Quarry, Charing</p> <p>It is understood that delivery of all the housing proposed in the garden community will not be achieved in the anticipated local plan period, however, this should be clarified in relation to permitted and allocated mineral reserves.</p> <p>The County Council would request that these matters are discussed with the Borough Council at the earliest opportunity.</p> <p>Sustainable urban Drainage Systems: The County Council has assessed all the proposed allocation sites and noted where there are any significant fluvial and surface water flood risk implications for development - and has submitted this information directly to Maidstone Borough Council. Twenty-one of the sites needed further consideration and this has been reflected in the current representation, as they have been removed. One site, proposed for mixed-use development, was noted to be impacted by Flood Zone 2 (Land between Maidstone Road and Whetsted Road), remains included, but the County Council notes that the assessment states that there is a need for suitable flood mitigation and SuDS measures within the site.</p> <p>Heritage Conservation: In the background data for each site, it is essential that the historic environment is covered under its own section and not placed under Landscape and Ecology. The historic environment will have opportunities and constraints separate to, and different from, the natural environment. Many small development allocations will have archaeological issues and some may include designated heritage assets and/or archaeological landscape features. These need to be highlighted for each allocation where they exist.</p> <p>Biodiversity: In respect of biodiversity matters, KCC has not commented on the individual policies as a desk top review of the site allocations has been provided directly to Maidstone Borough Council.</p> <p>Any proposed development in the Lenham and Lenham Heath areas, including the growth location, existing allocations and Heathlands, will need to be explicitly considered against the requirements set out in the Natural England advice note issued in July 2020. These proposals have a potential to impact on the Stodmarsh National Nature Reserve (NNR)downstream in the Canterbury area and therefore due regard should be had to the requirement of the Conservation of Habitats and Species Regulations 2017. The Habitats Regulation Assessment being undertaken as part of this Local Plan Review is considering the potential for these developments to impact</p>

Policy / paragraph	Commentary
	on the nutrients of the Stour. Whilst there is no legal requirement, a screening will be undertaken at Regulation 18b stage. This assesses the plan and site allocations in light of the development proposed in the Lenham area and their potential to impact on the Stodmarsh NNR.
Chapter 9 Non-strategic policies – Development Management Preferred Approaches	
CD6: New Agricultural Buildings and Structures	Attention is drawn to the Agricultural Bill regarding field margins and biodiversity. The policy also does not specifically mention new buildings and structures for diversification projects (e.g. food processing)
CD7: Expansion of Existing Businesses in Rural Areas	<p>The County Council would highlight the importance of providing local jobs for residents – this will be particularly important where growth is being proposed outside the urban areas, to ensure that it is sustainable and avoids unnecessary travel by private car. The policy to enable the expansion of existing businesses in rural areas is therefore supported.</p> <p>Farm shops should be able to sell produce from neighbouring farms and sales should not be restricted to the produce of the ‘home’ farm only.</p>
INF1: Publicly Accessible Open Space and Recreation	<p>Active Design: The County Council is currently working to develop local Kent examples to sit alongside the ten Sport England Active Design principles, which are set out in the Sport England Design Guidance.⁵</p> <p>Open spaces should be designed to be well connected and accessible, to limit car usage where possible. They should also be designed to create a comfortable environment for physical activity and recreation.</p> <p>Plans for growth should seek to provide a mix of formal and informal areas/spaces (indoor and out) where people can be active, including walking and cycling routes, open spaces and water-based activities.</p>
INF4: Digital Communications	<p>KCC welcomes the proposals to bring gigabit capable connections to new developments (FTTP). However, concerning the comments in the development management summary: (p314)</p> <ul style="list-style-type: none"> - The siting of equipment in sensitive locations should follow national policy and guidelines rather than be resisted <i>per se</i>. - Any local requirement for ‘innovative solutions’ which are outside established industry practice creates a high risk of those areas missing out from future market-led investments – leading to reduced or areas no mobile coverage
ENV 2: Change of Use of Agricultural Land to Domestic Garden Land	Heritage Conservation: Please see comments relating to Policy SP 14b Historic Environment.
Q&D 4: Design Principles in the	There is mention of increased traffic on country lanes, but no account has been made of the increase in size of farm machinery. Farm machinery that needs to be taken from

⁵ <https://www.sportengland.org/facilities-planning/active-design/>

Policy / paragraph	Commentary
Countryside	field to field (often by contract farmers farming someone else's land) and the increasing size of this machinery (because it does more) makes it difficult to access some lanes. Farmers will need to alter the access and egress to farm sites and create new entrances to some fields, which could helpfully be considered in the Local Plan Review.