

Maidstone Cycle Campaign Forum

Statement of Case – Rule 6(6)

Land West of Church Road, Maidstone – Applications: 19/501600/OUT and 19/506182/FULL

1. Introduction

1.1 Maidstone Cycle Campaign Forum (Registered Charity Number 1172691) represents the cycling community in Maidstone with its aim to improve the cycling conditions in Maidstone and encourage people to take up cycling as part of a healthy lifestyle, and also as a practical and environmentally friendly transport option.

1.2 The Maidstone Cycle Campaign Forum (MCCF) seeks to help and support the implementation of the KCC Active Travel Strategy and the Maidstone Borough Council Integrated Transport Strategy and Walking and Cycling Strategy.

1.3 MCCF are objecting to the development on the same grounds as Maidstone Borough Council because both the congestion and the safety issues highlighted by their objection are detrimental to Active Travel and cycling.

1.4 The Planning Applications as submitted do not make adequate provision for Active Travel. In summary the applications do not deliver the requirements and aims of the approved strategies, policies and plans of Maidstone Borough Council, Kent County Council and the Department of Transport together with the National Planning Policy Framework with regard to its provision for Active Travel.

2. Summary of Case

Having examined the Planning applications and the Transport Assessment:

2.1 Maidstone Borough Council have objective to the development on two grounds:

“1. Whilst mitigating increased traffic congestion on Deringwood Drive, the proposed improvements to the Deringwood Drive and Willington Street junction will result in severe traffic congestion on Willington Street contrary to policy DM21 of the Maidstone Borough Local Plan 2017 and Paragraphs 108 and 109 of the National Planning Policy Framework.

2. The proposal will result in worsening safety issues on Church Road to the south of the site which have not been addressed and due to the constraints of the road are likely to not be addressed by the application proposals and the mitigation proposed is not sufficient to overcome the safety concerns contrary to policy DM1 of the Maidstone Borough Local Plan 2017 and Paragraphs 108 and 109 of the National Planning Policy Framework.”

2.2 MCCF object on exactly the same grounds on the basis that:

2.2.1 Severe congestion on the Deringwood Drive and Willington Street junction will be detrimental to Active Travel including cycling at this junction.

2.2.2 Safety issues on Church Road will equally apply to the detriment of Active Travel including cycling.

2.2.3 Perception of safety issues will radically restrict the take up of cycling as a means of transport.

2.3 MCCF consider this site sits in a strategic Active Transport position at the junction between residential communities - Downswood and Bearsted to the north, Shepway to the west, Senacre and Park Wood to the south and Otham to the east. Park Wood itself is also a major employer and there are a large number of employment, educational and retail establishments which would be accessible via this site for existing communities. In addition, the site provides an access point for the Len Valley, Mote Park and Maidstone itself through integration with the National and Local Cycling network including the recent investment in the Mote Road cycleway. This linkage will be of significant benefit to both existing and potential new communities.

2.4 If this development proceeds there is an enormous opportunity to replace a very large number of 1 to 3 mile journeys currently undertaken in private cars with Active Travel.

2.5 The crucial requirement for the site plan is to lay out traffic free corridors through the site for walkers, cyclists and mobility transport for the disabled which establish smooth convenient connectivity within and between the residential, work, education and leisure points within the local area outlined in 2.3.

2.6 This could in part be achieved within the development by planning a walking / cycling route across the north of the site through the upgrade and reclassification of the existing Public Right of Way KM86 and this should be implemented to the DoT Cycle Infrastructure Design standards and Sustrans guidance with a minimum of 3 metres in width.

2.7 The upgraded Public Right of Way KM86 would require safe connectivity to National Cycle Route 177 where it exits at Church Road.

2.8 The development would need to effectively contribute to a North/South cycle route linking Downswood to Sutton Road and Park Wood developments.

2.9 Specifically the development would need to include cycle routes built as part of the scheme to current DoT and Sustrans design standards:

2.9.1 New route on the northern boundary connecting The Beams and Foxden Drive with Church Road. This would require the removal of steps which restrict access between the north west corner of the site and The Beams and in part Foxden Drive. This would open up connectivity to Sutton Road as required by the Maidstone Walking and Cycling Strategy, Greenfields School and both the entrances in the south east corner of Mote Park.

2.9.2 The development would need to effectively link to the existing cycle route - which is in the immediate proximity at the north east corner of the site and also ensure that the north west corner would link with a full specification cycle path to The Beams which would in addition allow access for the disabled/ mobility scooters. This would require a ramp to be provided between the north west corner of the development and would link to The Beams. The ramp would be to KCC's Countryside Access Design Standards (Appendix item L) and would provide inclusive mobility access, including for cyclists. The existing set of steps running east-west from The Beams to the north west corner of the development would be retained to provide a short cut for able-bodied users.

2.9.3 Connection to Woolley Road on the southern perimeter of the site making use of the existing access route upgraded to comply with current DoT Infrastructure Design Standards.

2.9.4 Introduction of a North/South Active Travel route through the site to take cyclists and pedestrians off Church Road as required by the Sustrans Walking and

Cycling Assessment and to comply with National, Borough and County strategies to put Active Travel at the centre of new developments. This route would connect via Woolley Road and would therefore provide Active Travel access to major employment centres such as Park Wood as well as local amenities and schools south of the site.

2.10 The specific policies not fully complied with are detailed in the Appendix.

3. Planning History

3.1 Maidstone Cycle Campaign Forum raised the following comments on Planning Application: 19/501600/OUT

3.1.1 the master plan fails to show any provision for cycle routes within the site.

3.1.2 the Transport Assessment (part 1 of 3) clause 5.10 refers to the "spine road" of the development. This should clearly state that provision will be made for cyclists to safely use this road. There is an opportunity to create motorised traffic free corridors through the estate for walkers and cyclists.

3.1.3 the master plan fails to show any link to the cycle route that terminates on Church Road at the North East corner of the site.

3.1.4 the Transport Assessment (part 1 of 3) clause 5.8, which notes a proposal to improve the Northern Footpath to a shared cycle / walkway, should clearly state that this will link to the existing cycle route - which is in the immediate proximity at the North East corner.

3.1.5 the Parameter Plan 16206 / C03A identifies two pedestrian / cycle access points. The opportunity should be taken to ensure priority access to these and to upgrade the path from Foxden Drive, Downswood and the access to Woolley Road, Senacre to a cycle / footway. This would encourage access to/from the new development to Downswood and Senacre schools and shops reducing dependency on use of a car on Church Road.

3.1.6 the Transport Assessment (part 1 of 3) Appendix 3, appears to deliberately omit this cycle path, as only part of the Maidstone Walking and Cycling Map is shown.

3.1.7 the proposal should include provision for shared cycleway / footways both external to and within the site. This provision would connect with the MBC / KCC scheme to provide facilities that encourage cycling and a modal shift from other means of transport.

Note: shared cycleway / footways should comply with Department for Transport - Cycle Infrastructure Design – Local Transport Note 1/20 and Sustrans guidance.

3.2 Maidstone Cycle Campaign Forum raised the following comments on Planning Application 19/506182/FULL

3.2.1 We consider this site sits in a strategic active transport position at the junction between residential communities - Downswood and Bearsted to the north, Shepway to the west, Senacre and Park Wood to the south and Otham to the east. Park Wood itself is also a major employer and there are a large number of employment and educational establishments which would be accessible via this site for existing communities. In addition, the site provides an access point for the Len Valley, Mote Park and Maidstone itself.

3.2.2 The development therefore represents an enormous opportunity to replace a very large number of 1 - 3 mile journeys currently undertaken in private cars with active travel.

3.2.3 The crucial step is to lay out traffic free corridors through the estate for walkers and cyclists (and other forms of mobility / leisure transport) which establish smooth convenient connectivity between residential, work, education and leisure points within the local area which have been outlined above.

3.2.4 With some minor adjustment this can be done within the existing plan for the walking / cycling route across the north of the site and this should be implemented to the Sustrans guidance and be a minimum of 3 metres in width. The plan needs to clearly link to the existing cycle route - which is in the immediate proximity at the north east corner of the site and also ensure that the north west corner links with a full specification cycle path to The Beams which would in addition allow access for mobility scooters.

Appendix

Relevant Strategies, Policies and Plans

A - MBC Walking and Cycling Strategy 2011-2031

https://www.maidstone.gov.uk/data/assets/pdf_file/0008/131849/Walking-and-Cycling-Strategy-2011-31-September-2016.pdf

“1.1.....The Strategy will be a material consideration in development management and spatial planning decisions, and will help to secure support for walking and cycling from other possible funding streams, e.g. developer funding via s106 obligations and CIL together with public/private partnerships between MBC, KCC and public transport operators to improve facilities.”

“1.2 The emphasis of the Strategy has been on identifying the improvements required to deliver a comprehensive and well-connected cycle network (rather than focusing in detail on pedestrian-only facilities), which will help to make both cycling and walking more attractive alternatives for journeys within the borough. The Strategy has been drafted by MBC with support from the Maidstone Cycle Campaign Forum and KCC. The document will act as a tool to assist in the delivery of the Transport Vision for Maidstone and in support of four of the five main ITS objectives as follows;

Objective 1: Enhancing and encouraging sustainable travel choices including:

A: The development, maintenance and enhancement of walking and cycling provision, through network improvements and encouraging uptake amongst the population;

C: Promotion and education regarding walking, cycling and public transport travel options;

E: Place sustainable travel options at the heart of all new developments within Maidstone, to ensure a fully integrated network that puts pedestrians, cyclists and public transport users at the centre of any transport proposals.

Objective 2: The enhancement of strategic transport links to, from and within Maidstone town.

Objective 3: Ensure the transport system supports the growth projected by the Maidstone Borough Local Plan.

Objective 4: Reducing the air quality impacts of transport.

Objective 5: Ensure the transport network considers the needs of all users, providing equal accessibility by removing barriers to use.

“1.7 where the infilling of gaps in cycle facilities will make the greatest contribution towards achieving modal shift from private car journeys.”

“National Planning Policy Framework (NPPF)

2.2 The NPPF (2) sets out in broad terms the approach that local authorities should follow in preparing land use and transport plans, to which this Walking and Cycling Strategy is aligned. In particular, para 17 of the NPPF states that a core principle is that planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling.

Developments should be located where the need to travel will be minimised (para 34) and designed so that ‘priority is given to pedestrian and cycle movements’,

with ‘safe and secure layouts which minimise conflicts between traffic and cyclists

or pedestrians’.”

“5.2 This Walking and Cycling Strategy identifies four main objectives to achieve these targets:

1. *Creating new links* – seeking new opportunities to extend routes to more people;

2. *Maintenance of the cycle route network* – looking after what we already have, and improving it;

3. *Creating a safer environment for walkers and cyclists* – designing safer routes

and providing road safety education for motorists and non-motorised users alike; and

4. *Spreading the word* – raising awareness of existing and emerging facilities available to walkers and cyclists.”

“5.3 In terms of creating new cycling links within the borough, which will also benefit walkers, proposals will be developed subject to available funding with the following strategic long-term aims in mind:

- ‘Filling in of the gaps’ to create a **fully integrated urban cycle network**, with radial routes joined across the town centre. Key destinations (e.g. schools, colleges, hospitals, shopping centres, visitor attractions) and new housing and employment sites will be integrated into the cycle network.

- The creation of an **orbital walking and cycling route** around the Maidstone urban area, linking to the town centre via radial routes. This would be delivered through the designation of cycle routes along quiet lanes as well as the upgrading of existing footways alongside distributor roads and, where possible, footpath networks to provide cycle linkages.....”

B - MBC Integrated Transport Strategy 2011-2031

http://www.maidstone.gov.uk/data/assets/pdf_file/0008/164672/Integrated-Transport-Strategy-2011-31-September-2016.pdf

“4.5 The NPPF recommends that Transport Assessments and Travel Plans should accompany applications for developments that generate significant amounts of movement, although it recognises that the opportunities to maximise sustainable transport solutions will vary from urban to rural areas.”

“4.20 The Countryside and Coastal Access Improvement Plan sets a number of objectives especially for sustainable transport:

Priority cycling objectives include:

- Support increasing cycling for everyday journeys, including seeking improvements to routes serving transport hubs, large employers and schools, and connecting cycling networks.
- Deliver a continued increase of traffic-free routes and a better connected network to support the development of tourism, family and recreational cycling.”

“5.2By 2031, Maidstone town and its surrounding area will be well known for its efficient, sustainable and accessible transport system which will support a thriving and attractive county town, and provide efficient and effective links with the surrounding villages, countryside and beyond. More and more people will walk, cycle and use public transport and this will help reduce car traffic on radial routes from the town and support the continued growth of the area while protecting its distinctive character and environment.

New routes will be developed for walking, cycling and public transport which will link up communities, employment, services and facilities and alternatives to the private car will be promoted. Information about sustainable transport options will be readily available and new technology will make this easy to access.”

“Promote modal shift

6.7 The implications of changing behaviour are that people shift from using

the private car for the majority of journeys towards using more sustainable modes of transport where possible and appropriate. The private car continues to be the primary means of transport in the rural areas but relatively minor shifts in mode can make a significant difference in terms of congestion particularly with regard to trips to the urban area for work and leisure.”

“Action Plan

C1 Cycling Maintain and further develop a strategic cycle network, connecting the town centre to key facilities and residential areas.”

“8.79 Maidstone should have a comprehensive, safe, cycle network in order to facilitate and encourage cycle journeys. At present the borough has a number of cycle routes focused on the urban area, however these are often disjointed with limited off road options. Delivering a strong strategic cycle network requires: Maintenance and enhancement of existing cycle infrastructure. Reviewing cycle routes and links already in place ensuring:

- Existing gaps in the network are addressed, providing safe and continuous linkages to known destinations e.g. The Oakwood Park Education Campus.
- Routes are unimpeded by street furniture, pavement parking and other obstructions
- Routes are maintained clearing cycle ways of hazardous defects and overgrown vegetation
- Appropriate signage is in place to clearly identify cycle routes”

“Action C5: Support the Maidstone Cycle Campaign Forum as a group to promote the cycling cause in the borough; in order to ensure the Walking and Cycling Strategy and the Integrated Transport Strategy provide a coherent strategy for the promotion of Active Travel in the borough.”

C - Maidstone Borough Local Plan

<https://services.maidstone.gov.uk/docs/October%202017%20Adopted%20Local%20Plan.pdf>

Policy SP 23

“2. ii Deliver modal shift through managing demand on the transport network through enhanced public transport and the continued Park and Ride services and walking and cycling improvements;”

“4.250 Section 106 Agreements will continue to be used for site specific infrastructure on development sites, such as local provision of open space, habitat

protection, flood mitigation, access roads and sustainable transport infrastructure.”

Policy H1(8) West of Church Road, Otham

“Access

8. Access will be taken from Church Road only.”

“Air quality

9. Appropriate air quality mitigation measures to be agreed with the council will be implemented as part of the development.”

“Highways and transportation

12. Widening of Gore Court Road between the new road required under policy H1(6) and White Horse Lane.”

Policy DM 21

“Assessing the transport impacts of development

1. Development proposals must:

- i. Demonstrate that the impacts of trips generated to and from the development are accommodated, remedied or mitigated to prevent severe residual impacts, including where necessary an exploration of delivering mitigation measures ahead of the development being occupied;
- ii. Provide a satisfactory Transport Assessment for proposals that reach the required threshold and a satisfactory Travel Plan in accordance with the threshold levels set by Kent County Council’s Guidance on Transport Assessments and Travel Plans and in Highways England guidance; and
- iii. Demonstrate that development complies with the requirements of policy DM6 for air quality.”

D - Kent County Council – Active Travel Strategy

https://www.kent.gov.uk/data/assets/pdf_file/0006/71772/Active-Travel-Strategy-Easy-Read.pdf

“4. Barriers to Active Travel

4.1. Feedback from Kent residents and organisations shows that the main reasons for not making short journeys using active travel are a perceived lack of suitable continuous

routes between homes and community services, workplaces or schools, and not enough promotion of existing routes...”

“8.2. Action 1: Integrate active travel into planning

This Strategy will influence commissioning decisions and ensure active travel is prioritised in future planning processes. In addition, the Strategy will encourage active travel to be better integrated with other types of transport e.g. walking to the bus stop or cycling to the train station.”

“10.1.4. Work with developers to ensure active travel routes are a priority, both within developments and linking sites to other services, community facilities and transport hubs”

“10.1.5. Work with developers to secure sufficient areas within developments for green spaces and attractive routes and environments that encourage active travel”

E - Department for Transport - Cycle Infrastructure Design – Local Transport Note 1/20

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906344/cycle-infrastructure-design-ltn-1-20.pdf

“1.9 Realising our ambition will take sustained investment in cycling and walking infrastructure. It will take long-term transport planning and it will take a change in attitudes – amongst central Government, local bodies, businesses, communities and individuals. Walking and cycling should be seen as transport modes in their own right and an integral part of the transport network, rather than as niche interests or town-planning afterthoughts. We need to build a local commitment together to support this national Strategy.”

F - Department for Transport – Cycling and Walking Investment Strategy

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/758519/cycling-walking-investment-strategy-safety-review.pdf

G - Department of Transport - Gear Change - A bold vision for cycling and walking

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf

H - Sustrans – Walking and Cycling Assessment

http://www.maidstone.gov.uk/data/assets/pdf_file/0010/198370/Maidstone-Walking-and-Cycling-Assessment.pdf

Approved for publication by Maidstone Borough Council – Strategic Planning, Sustainability and Transportation Committee 12 June 2018.

The South East Corridor – Section B & C

“Investigate feasibility of off road cycle route running parallel to Church Road”

Page 33

C Route through Mote Park to South East via Church Road

“Church Road is a country lane type road with associated issues of high vehicle speeds, limited space and restricted forward visibility making for hostile on road conditions for cyclists”

“Church Road (7 day count) Flow 1422 Average Daily Flow - Speed 85th% North Bound 38.5mph South Bound 37.1mph”

“Interventions ... 3 Build Off-road route set back from carriageway along Church Road.”

“* An alternative and much cheaper option would be to close Church Road to through traffic whilst retaining local access. Considering the already daily low flows this maybe a very practical option.”

April 2018

I - National Planning Policy Framework (NPPF)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

J - Kent County Council - Public Rights of Way and Access Service - Letter reference 87652 dated 18 April 2019

“Impact on Public Footpath KM86

This right of way passes through the northern part of the proposed development site, providing a valuable off-road walking route and east-west connectivity for local residents. The footpath is significant, as it provides access to the wider network of PROW located to the east of the site. This has been acknowledged by the applicant within their Design and Access Statement (Page 16).”

“Concerns are raised with the proposed cycleway along this right of way, as the route is currently recorded as a Public Footpath. As a general principle, the PROW and Access Service are supportive of new cycling routes, as they increase opportunities for active travel and outdoor recreation. However, the applicant should be aware that the status of the Public Footpath would need to be legally changed to facilitate cycling. The route could potentially be converted to a cycle track, with the agreement of Kent Highways, or upgraded to a Public Bridleway, but the approach would need to be agreed with the County Council.”

K - Sustrans Published Design Guidance

<https://www.sustrans.org.uk/for-professionals/infrastructure/national-cycle-network-design-principles>

<https://www.sustrans.org.uk/for-professionals/infrastructure/sustrans-traffic-free-routes-and-greenways-design-guide/>

L - Countryside Access Design Guide (KCC publication)

https://www.kent.gov.uk/_data/assets/pdf_file/0017/5138/ramps-design-standards.pdf

