

MAIDSTONE BOROUGH LOCAL PLAN REVIEW

DRAFT PLAN FOR SUBMISSION (REGULATION 19)

OBJECTION TO SOUNDNESS AND LEGAL COMPLIANCE ON BEHALF OF LENHAM PARISH COUNCIL

HEATHLANDS GARDEN SETTLEMENT

POLICY LPRSP4 (A) (6) HEATHLANDS GARDEN SETTLEMENT

TRANSPORT CONNECTIONS

CUMULATIVE IMPACT ON M20 JUNCTION 8

LPC ELEVEN

1. Policy LPRSP4 (A) (6) (b) requires Heathlands to provide two new access connections to the A20 to the north of the site. There is no evidence that a proper examination has been conducted of the entire strategic road network serving Heathlands. Kent County Council when consulted at regulation 18 b stage did express concerns as to whether key junctions on the A20 corridor, particularly on the approach to M20 Junction 8 would have capacity to cater for the likely traffic impacts.
2. In order for the plan to be complete the assessment should be undertaken of those junctions. Schemes should be prepared that can be audited to be deliverable. The land needed to construct those improvement schemes should be defined and included within this local plan review document. Until that work has been done it is not possible to assess the traffic and the environmental implications of the ambition described within the Homes England document “Heathlands Development Project Delivery Plan” proposal to provide 5000 houses and 5000 jobs at Heathlands. That would be in addition to the 1000 houses already provided for up to 2031 under the allocations set out in the ‘made’ Lenham Neighbourhood Plan.
3. Woodcut Farm is a significant employment site granted planning permission for a mixed-use business park in 2018. (Review, para 7.60, p.129). The site lies very close to Junction 8 on the M20.
4. Paragraph 7.68 of the Review details the scope of improvements required to nearby junctions as follows:
 - the M20 Junction 8 (including the west-bound on-slip and merge;
 - the A20 Ashford Road/M20 link road roundabout;
 - the A20 Ashford Road/Penrose Hill junction;
 - the A20 Ashford Road/EyehorneStreet/Great Danes Hotel access.

The M20 Junction 8 is a complex of junctions comprising the main motorway junction which is elevated over the carriageway and three other small roundabout junctions as listed above. All of these are adjacent to Leeds Castle.

5. The fact that the mixed-use business park at Woodcut Farm cannot be implemented without the significant work listed above indicates that this junction complex is currently operating at or close to capacity.
6. The Leeds Langley corridor safeguarding area is shown on page 67 of the Review. The safeguarding area extends very close to M20 Junction 8. The route for the Leeds Langley Relief Road is shown in the 2000 Maidstone Borough-wide Local Plan adopted December 2000. The route intersects with the A20 close to the Ashford Road/Eyehorne Street/Great Danes junction described above. It is reasonable to assume that any future Leeds Langley Relief Road will make a junction with the A20 at or close to M20 Junction 8.
7. No development is allocated in the Leeds Langley Corridor in the Review. It is reasonable to assume that if this matter is not addressed through this Examination process the potential for development will be examined in the next review of the plan. Assuming this plan is adopted in 2023 the next new plan should be adopted within 5 years i.e. by 2028.
8. Under the terms of policy LPRSP4 (A) Heathlands is anticipated to come on stream with occupations in 2029.
9. When the work is done on the Leeds Langley Relief Road it may not be possible to make a junction with the A20 near to M20 Junction 8. That might be because all the capacity in the junction may well have been taken up by 5000 new dwellings and 5000 new jobs at Heathlands which will, to a very large extent, rely on M20 Junction 8 for accessibility.
10. Lenham Parish Council feels that before a decision can be taken in principle to allocate Heathlands there should be an evaluation of the cumulative traffic impact on M20 Junction 8. That evaluation should include:
 - Woodcut Farm;
 - local plan sites in Lenham and Harrietsham;
 - 1000 additional dwellings released through Lenham Neighbourhood Plan;
 - Potential effect of the Leeds / Langley Road and its enabling development; which could be 4000 additional dwellings.
11. Footnote 37 to the NPPF (page 20) states:

‘The delivery of large-scale developments may need to extend beyond an individual plan period and the associated infrastructure requirements may not be capable of being identified in full at the outset.’

Lenham Parish Council believes that Footnote 37 does not apply to Heathlands. The associated infrastructure requirements are fully capable of being identified at the outset. These should be identified and catered for before a decision is made in principle to allocate Heathlands for development.

12. The Homes England 'Heathlands Development Project Delivery Plan' forms part of the evidence base supporting the Review. Page 8 of the project delivery plan document contains a summary of infrastructure costs and scheme abnormalities. Under the heading access and movement, the listed improvements include:
 - Upgrade to A20 Junction 8 connections;
 - M20 Junction 8 signalisation and local widening.
13. It seems to the parish council that not only are the Footnote 37 infrastructure requirements capable of being identified in the case of M20 Junction 8 they actually have been identified and included in the evidence base supporting the Review.
14. Lenham Parish Council is of the opinion that the 'local widening' and 'signalisation' of M20 Junction 8 should actually be defined. Any land ownership implications should be understood. The land required for these works should be identified on the policies map. The works should be listed under Transport Connections in policy LPRSP4 (A). The M20 Junction 8 improvement scheme should address cumulative impacts including Woodcut Farm and Lenham Neighbourhood Plan.
15. There has been no local plan consultation on the basis that the Heathlands proposal actually includes signalisation and 'local widening' of M20 Junction 8.
16. While no two schemes are ever the same it is, however, possible to draw some conclusions from similar schemes which have addressed similar issues. Inspector Phillip Lewis wrote to Tandridge District Council on 13th September 2021 as part of the Examination of the Tandridge District Council Our Local Plan: 2033. He wrote as follows:

Transport modelling

2. In my preliminary conclusions and advice on the submitted Plan (ID16) I expressed concerns regarding the provision of the necessary mitigation to Junction 6 of the M25 motorway to accommodate the growth proposed in the Plan. I explained my view that it is uncertain which, if any, of the Plan's proposals may go ahead without residual cumulative impacts of development on the transport network being severe in terms of the National Planning Policy Framework 2012 (Framework 2012). I appreciate that work has been underway on additional transport modelling.

3. It is apparent from your letter that there will not be clarity as to the extent of additional capacity which would be achieved by the proposed improvements to Junction 6 until the turn of the year at the earliest. I note also that National Highways (formerly Highways England) has expressed concern as to whether the improvements being considered would be capable of accommodating the

development as proposed in the Plan, and that the Council acknowledge that in the longer term there is a need for a more substantial upgrade to Junction 6. It is not clear as to whether these concerns relate to development within the plan period only, or include the full extent of the proposed South Godstone Garden Community (Policy SCG01).

4. As I expressed in ID16, I consider that the proposed improvements to Junction 6 are fundamental to the implementation of significant parts of the spatial strategy proposed for the Plan. The latest information does not give me any comfort that the spatial strategy as proposed is justified, or in terms of effects on the transport network, that the submitted Plan would be consistent with national policy. I fear that the soundness concerns that I have expressed in this regard are still some way off being resolved without some certainty that the motorway improvements can be delivered. Furthermore, this reinforces my view that even if the Junction 6 capacity issues could be resolved, the likelihood of the proposed Garden Community making any significant contribution to housing land supply in the Plan has diminished further, given the additional time passed, and the work which remains to be done.

5. Whilst I am conscious that the additional information has not been subject to testing through the examination as it is in effect work in progress, and representors have not had the opportunity to comment, it appears to me that given the new concerns expressed about the effectiveness of the Junction improvements proposed in terms of capacity, there is a high risk that the Plan as submitted is not capable of being altered by way of main modifications so that it may be found sound without considerable work and within a reasonable timeframe.

17. The similarities are as follows:

- the plan included a proposed South Godstone Garden Community;
- that proposal required mitigation to Junction 6 of the M25 motorway;
- there was a need for clarity as to whether the scheme then proposed would deal with the issues during the plan period or whether a more substantial upgrade would be needed to include the full extent of the proposed Garden Community.

In that case the Inspector concluded there was high risk that the submitted plan would not be capable of being altered by way of main modification so that it may be found sound.

18. Lenham Parish Council feels the submitted plan is incomplete because it has not defined all the infrastructure needed to accommodate Heathlands.

19. The cumulative visual and highway impacts of the complete proposal have not therefore, been assessed. The sustainability appraisal is written in the complete absence of assessing future works on M20 Junction 8. The SA is therefore incomplete and not legally compliant.

20. Lenham Parish Council believes the Heathlands proposal has not been fully evaluated and as a consequence should be deleted from the Review in its entirety.