



National Highways Planning Response (NHPR 24-02) Formal Recommendation to an Application for Planning Permission

From: Regional Director
Operations Directorate
South East Region
National Highways
PlanningSE@nationalhighways.co.uk

To: Ashford Borough Council (FAO Faye Tomlinson)
planning.appeals@ashford.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 22/00571/AS

Location: Land North of Possingham Farmhouse, Ashford Rd, Great Chart, Kent

Proposal: Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access only (excluding internal circulation routes), with all other matters reserved

National Highways Ref: NH/24/06883

Referring to the consultation on a planning application dated 25 April 2022, in the vicinity of the M20 at Junction 9 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- a) offer no objection (see reasons at Annex A);**
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- ~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

¹ Where relevant, further information will be provided within Annex A.

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningSE@nationalhighways.co.uk.

Signature:

Date: 4 September 2024



Name: Kevin Bown

Position: Spatial Planner

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Annex A National Highways' assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommendation: offer no objection

Reasons

National Highways have proactively engaged with the Council, applicant and Kent County Highways regarding this application.

Ashford Borough Council refused the application by decision dated 14/12/23. At that time National Highways had in place a Holding Recommendation, dated 3/11/23, setting out our concerns and requirements.

The refusal was appealed in June 2024. Since then, the parties have met to agree what further evidence needed to be submitted ahead of the appeal being heard in October 2024. The aim being, in accordance with normal practice, to progress matters as far as possible leaving only those matters not agreed to be addressed via the hearing.

The applicant (via their transport advisor SLR) submitted the following evidence in August 2024 (copies provided to Ashford BC)

- Transport vision for the proposed residential Development on the land north of Possingham Farm
- Possingham Farmhouse TIA Review
- S07 DSS – Updated Trip Generation and Distribution Traffic Flow Diagrams for appeal NH 200823
- Assessed Junctions Mapping

We have reviewed the evidence. We do not agree with the spreadsheet analysis carried out by SLR as it contains certain methodology/ interpretation deficiencies. Hence, we do not agree with their forecast impacts at M20 J9 (AM peak 18 two-way vehicle trips and PM peak 26 two-way vehicle trips based on submission of 22 August 2024). However, by correcting the deficiencies in the SLR analysis, our view is that the impact at M20 J9 would be circa 70 two-way trips in each of the weekday AM and PM peak periods

We have considered the forecast impact at M20 Junction 9 together with the existing operation of the junction. We have concluded that the degree of forecast traffic impact at M20 Junction 9 is not material and further analysis of the SRN is not required.

In relation to the Vision document, we note that many of the measures proposed will not effectively function until the point at which Chilmington Green is fully developed. It is also not clear how some of the measures will be delivered and maintained as appropriate in practice (this being the validate part of Vision & Validate). However, our own analysis makes an allowance for additional vehicle trips if the Vision is not fully realised.

We recognise that Kent County Highways have raised their own concerns and requirements with regards matters related to the local highway network. Nothing in our assessment or conclusions should be taken as negating them in any way.

Based on our assessment of the potential impact of the proposed development on the SRN, particularly M20J9, while we consider there are matters still to be addressed by the applicant regarding the Vision & Validate, it does not alter National Highways conclusion that the proposed development would not unacceptably impact on the safety, reliability and/or operation of the strategic road network and in this respect is considered to comply with DfT C1/22 and NPPF (December 2023). Hence, we have No Objection to application 22/00571/AS.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 74 and 109 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 108 and 114 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.