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| Our ref | AS1200400 |
| Email: |  |
| Date: | 17 December 2012 |

Dear Ms Jarrett

**Outline Application for a Comprehensive Mixed Use Development at Chilmington Green, Ashford.**

Thank you for consulting Kent County Council on the application. KCC welcomes the opportunity to comment on the proposal.

**The Proposal**

The County Council understands outline planning permission is sought for a mixed use development comprising:

* Up to 5,750 residential units, in a mix of sizes, types and tenures
* Up to 10,000m² (gross external floorspace) of Class B1 use
* Up to 9,000 m (gross external floorspace) of Class A1 to A5 uses
* Education (including a secondary school of up to 8 ha and up to four primary schools of up to 2.1 ha each)
* Community uses (class D1) up to 5,000m² (gross external floorspace)
* Leisure Uses (class D2) up to 5,000 m² (gross external floorspace)
* Provision of local recycling facilities
* Provision of formal and informal open space
* Installation of appropriate utilities infrastructure as required to serve the development, including flood attenuation works, SUDs, water supply and waste water infrastructure, gas supply, electricity supply (including sub stations), telecommunications infrastructure and renewable energy infrastructure
* Transport infrastructure, including provision of three accesses onto the A28, an access on to Coulter Road/Cuckoo Lane, other connections on to the local road

network, a Park and Ride with a maximum of 600 parking spaces and a network of internal roads, footpaths and cycle routes

* New planting and landscaping both within the proposed development and on its boundaries and ecological enhancement works and
* Associated groundworks

It is understood appearance, landscaping, layout and scale will be addressed through reserved matters applications at a later date. Access will also be the subject of a reserved matters application with the exception of the three accesses onto the A28 and access on to Coulter Road/Cuckoo Lane which are addressed in this application.

**Planning Policy**

Policy CS5 of the Ashford Borough Core Strategy (adopted 2008) establishes Chilmington Green as a suitable location for an extension. The policy states the site is suitable for accommodating “no less than 3,350 dwellings and 600 jobs by 2021 and has the potential for a further 2,200 dwellings and at least 750 jobs post 2021”. The draft Chilmington Green Area Action Plan published in April 2012 provides the policy and delivery framework for the development at Chilmington Green.

**KCC’s Response**

**1. Community Infrastructure**

*Primary Education*

In January 2012 KCC provided Ashford Borough Council with details of its infrastructure requirements to support the development at Chilmington Green. In our response to ABC’s Discussion Paper KCC identified a need for the following education provision

* 3 x 2FE primary schools and 1 x 1FE primary school with the capability of being expanded to 2FE in case the requirement for the development exceeds current expectations. Each primary school would need to be delivered on a 2.05 hectare site. Also a 8FE school would need to be provided on a 10ha site.

KCC supports Policy CG15 of the Draft Chilmington Green AAP concerning education provision. The County Council notes the reference to the provision of 3 x 2FE and 1 x 2FE primary schools in the development, and for each school to be delivered on a 2.1 hectare site.

The County Council requires land for the primary schools to be transferred into KCC’s ownership at least two years prior to the planned opening of the first form of entry. Indicative timings for the opening of the primary schools are listed below. However the County Council understands there may be need for flexibility to reflect build out times. Should the need arise, KCC would be willing to review the timing detailed below.

|  |  |  |
| --- | --- | --- |
|  | 1st FE of school to be open end of | No of dwellings completed |
| Primary school 1 | Year 3 | 375 |
| Primary school 2 | Year 8 | 1690 |
| Primary school 3 | Year 16 | 3570 |
| Primary school 4 | Year 23 | 5135 |

KCC understands the need for schools to be provided in a timely manner to ensue infrastructure is provided to support the development. Funding options for the delivery of the first primary school would need to be given further consideration and KCC would welcome further discussions with Ashford Borough Council on the matter.

KCC is currently undertaking a review of build costs for primary schools which once complete will need to be approved by Members before any changes are implemented.

*Secondary Education*

KCC’s response to the Discussion Paper identified a need for an 8 FE secondary school on a 10 ha site to serve the development and wider Ashford area. Policy CG15 makes provision for a minimum 6 FE secondary school on a minimum 8 ha site. The County Council’s response to the AAP identified a strategic need over and above the requirement in Policy CG 15 and this would be addressed through the Core Strategy Review. It is noted the planning application seeks permission for a 6FE secondary school on an 8 ha site.

The number of secondary school pupils from this development is forecast to consolidate to 1,116. A 6FE secondary school with sixth form can accommodate 1,150 (Building Bulleting 98). The percentage of pupils generated by the Chilmington Green development would therefore be 97%. As the new secondary school is also to be a strategic provision for Ashford then it will be imperative for Ashford BC and KCC to identify the additional 2 ha of land in order to make provision for the additional 2FE possibly through the Core Strategy Review as discussed in the meeting on 17th October 2012. The County Council would be happy to discuss this with Ashford Borough Council officers.

The number of Year 7 secondary school places in Ashford is 1351. Currently, 7% of Year 7 places are vacant in Ashford, with 6% of all secondary school places vacant. The Year 7 cohort is expected to be at its lowest in 2012 before rising and peaking in 2019. At this peak a further 60 places will be needed to meet demand. A deficit of places is expected from 2018 to 2020, before rolls reduce back to the current capacity figure. The need for action is therefore dependent upon whether house building matches the proposed housing trajectory.

The infrastructure table attached provides further detail of the education requirements arising from the development of the site.

*Families and Social Care*

In response to Ashford Borough Council’s Discussion paper, KCC identified the need for the following infrastructure requirements to serve the new development:

* 250 sqm (net internal) dedicated fully fitted out space to enable the delivery of services to clients
* Use of a fully DDA compliant kitchen and changing facility
* Joint assessment and delivery with Health and Social care through two fully fitted out co-location facilities each comprising approximately 28 sqm (net internal floorspace), consulting rooms (14sqm each) per GP Practice site.
* Wheelchair Accessible Housing: to cater for people with physical disabilities and families with disable children. To deliver as part of the Affordable Housing quota a number of wheelchair accessible properties across the development. Recommendation 1% of total development.
* A financial contribution towards the provision of Telecare for an estimated 83 clients would be sought. This would cover the cost of the purchase and installation of equipment.

Policy CG17 of the Draft Chilmington Green Area Action Plan makes provision for 340 sqm (net internal) (hub plus changing facility) for the delivery of FSC’s services and a suitably designed kitchen. This would be delivered through the s.106 agreement.

Policy CG18 refers to the need for a mix of affordable housing types, size and tenure. Supported housing schemes will need to be agreed with the Borough Council. In the County Council’s response to the AAP consultation, changes to the wording of the policy were sought to ensure wheelchair accessible homes are delivered on site.

KCC supports the provision of a community hub as part of the development to space for the delivery of health and social care services. The Planning Statement accompanying the planning application makes reference to details of affordable housing to be decided through the s.106 agreement for the site. Wheelchair Accessible Housing should be delivered as part of this and KCC’s Officers would welcome involvement in the delivery of these to ensure suitable housing solutions are delivered to all client groups.

The County Council continues to seek a financial contribution towards the provision of Telecare services which should be delivered through a s.106 agreement.

Further detail of KCC’s infrastructure requirements can be found in the table attached.

*Customer and Communities*

In its response to Ashford Borough Council’s Discussion paper in January 2012 the County Council identified that the following infrastructure would be needed to support development at Chilmington Green:

* 12sqm (net) library access point including fixture and fitting together with a financial contribution of £1.431m. An obligation was sought for the development consortium to provide a fully fitted out library facility should a third party wish to deliver the service in the future.
* Financial contribution of £225k towards the provision of community learning (formally known as adult education) and a requirement for 2 areas each measuring 50sqm to serve as general use classrooms.
* The use of onsite facilities for delivering youth services and if appropriate space for an alternative provider to deliver services.

KCC’s response to the draft Chilmington Green AAP sought amended wording to Policy CG17 to reflect the need for the provision of a library access point, community learning facilities and youth services.

The County Council is willing to discuss innovative ways of managing both the public realm and shared community buildings providing these meet appropriate standards including safety requirements and meet cost considerations.

*Superfast Broadband*

KCC sought the provision of superfast broadband to serve all residential, commercial and community buildings (KCC’s response to Ashford BC’s Discussion Paper). The Draft Chilmington Green AAP did not refer to its provision. The County Council however notes that the planning application seeks the provision of telecommunication infrastructure.

The County Council supports the Borough Council’s/AAP’s aspirations that there are sufficient facilities within the new development to meet the needs of the community, reduce the need to travel and to create a sense of place.

*Provision of a Community Hub*

Some of the County Council’s requirements (e.g. Families and Social Care (FSC) and Customer and Communities (CC)) are based on the hub and spoke model of delivery which the County Council considers is the most cost effective form of delivery at the current time. The main contributions for CC for example are intended to support improvements to the Gateway in the Town Centre, with more limited facilities provided on site. The County Council is still however keen to ensure that appropriate space is available to enable “the spoke” services to be delivered more locally whether delivered directly by the County Council or others.

The County Council also recognises there needs to be some flexibility built into delivery mechanisms to ensure that service providers can respond to the changing needs of the community and changes in how services are delivered. The County Council has worked closely with other providers in the past on the potential components of a community hub and will continue to work with the Borough Council and the developer’s on this concept but other providers such as health and the voluntary sector also have a key role to play.

The County Council would support the provision of flexible space which different service providers could access as the community’s needs evolved over time. The County Council will also consider the scope for the dual use facilities (e.g. early years and children’s centres linked to schools) although there may be some limitations on integration with other uses as a result of child protection and asset management considerations, but as far as practical opportunities to co-locate uses will be considered particularly where there are wider community benefits.

*Construction Costs*

These will be subject to ongoing review and the latest approved estimates will be fed into the detailed negotiations going forward. Final costs may also need to reflect the aspirations of both the developer and the ABC in respect of the standard of excellence they wish to promote within the scheme.

**2. Design Quality**

In order to promote a high quality of development, the County Council would recommend adopting appropriate design standards throughout the development including the use of design codes and design review. The developers should be encouraged to develop bespoke design solutions that identify and reinforce individual character areas. This might include relying on an appropriate pallet of materials but still allowing for individuality where this is needed to create distinctiveness and diversity.

Emphasis should be given to promoting a high quality public realm which promotes the use of walking and cycling.

The County Council would also support the delivery of a mixed use development in order to reduce the need to travel, provide the new community with access to a range of services and ensure that the development has a sense of place. This may mean the developer forward funding some facilities such as local shops, commercial leisure facilities and work spaces until they become viable.

The County Council would wish to promote high quality design in its own buildings subject to appropriate funding being secured through section 106 to enable this to happen.

The County Council will work with ABC to look at how innovative design approaches to highway design might contribute to the overall quality of development subject to these approaches being compatible with access and safety considerations.

**3. Highways**

***i) Proposed points of access onto A28 Chart Road and junction with Coulter Road***

Drawings to show the proposed new points of access are insufficiently detailed to allow a technical review to be undertaken. A set of fully annotated engineering drawings are required, that must contain all relevant measured distances, as well as the proposed drainage layout. It is requested that the drawings are provided in CAD format. The drawings in question are as follows:-

* A new northern A28 roundabout with a 60m ICD (drawing 2761/GA/011/D)
* A new southern A28 roundabout with a 40m ICD (drawing 2761/GA/013/D)
* A signalised junction of the A28, Goldwell Lane and a new site access arm to replace the existing priority junction arrangement (Drawing 2761/GA/012/D)
* A new mini-roundabout junction with Coulter Road and a new site access arm (Drawing 2761/GA/014/C)

A Stage 1 Safety Audit will also need to be submitted for the proposed new points of access.

***ii) Trigger points for off-site improvement works to A28 Chart Road***

Documents submitted as part of the outline planning application do not explicitly define the timing/phasing of physical works required to address highway capacity issues on A28 Chart Road as a result of the Chilmington Green development to ensure that at least a ‘nil detriment’ position is achieved. As explained within paragraph 9.2.4 of the publication version of the Chilmington Green Area Action Plan (dated April 2012):-

*“It is apparent that the existing capacity of the A28 provides a potential barrier to the unconstrained delivery of the Chilmington Green development. Therefore, any Transport Assessment associated with an application for the development will need to assess the phasing of the development against the implementation of various off-site highway improvements to the A28 and any other primary or secondary links or junctions within the adjacent parts of the urban road network to ensure that, at least, a ‘nil detriment’ position is achieved. The forward funding of the KCC promoted improvements to the A28 by the developer combined with a reasonable commitment to implement the works by KCC should avoid the need for the development to be stalled but, if necessary, the council will use planning conditions and/or obligations to ensure that the necessary highway infrastructure is in place to cater for the traffic being generated on the network at all times (as would be the case with any other development in the same circumstances).”*

In accordance with the AAP document, the Transport Assessment must provide an assessment of the phasing of the development against the implementation of off-site highway improvements to the A28, which it does not do. Therefore, in order to understand the impact of additional trips on the network as a result of built development at Chilmington Green, junction performance for the relevant future year scenario is required. The detail should allow the impact of additional traffic on individual sections of the A28 corridor (Matalan roundabout to Tank roundabout) to be determined.

This information/analysis is required to translate the timing of necessary physical works to the A28 Chart Road into appropriately worded Grampian conditions (and associated ‘trigger points’), to ensure that the completion of built development at Chilmington Green does not proceed ahead of necessary off-site highway improvements to the A28 Chart Road.

The relative sequence of proposed improvements to the A28 Chart Road must be ordered to deliver the maximum level of highway capacity improvement as part of a ‘corridor’ approach. The longstanding agreement has been that Tank roundabout must be improved first in order to release capacity on the A28, followed by Loudon Way junction, Matalan roundabout and lastly the railway over-bridge. The trigger points presented in **Table 1** should be used to inform discussions about the relative timing of improvement works to the A28 Chart Road.

**Table 1.** Possible ‘trigger’ points for improvements to the A28 Chart Road

|  |  |
| --- | --- |
| **Phase of scheme** | **Trigger point (number of residential units)** |
| Full Tank Roundabout | 1500-1800 |
| Loudon Way junction (inc signals) | 1000 |
| Full Matalan Roundabout | 0-250 |
| Railway overbridge | 2500 |

***iii) Delivery of improvement works to A28 Chart Road and financial risk***

It is imperative that KCC are not subjected to any financial risk in delivering the A28 Chart Road improvement works. Indeed, KCC will not be prepared to progress off-site highway works to the A28 Chart Road until such time that all necessary funding is in place and held on account.

***iv) Trip generation associated with Education/Community Uses***

Data entered into Table 9.1 (page 80) records the trip rate by land use class. Education and Community uses are grouped together. It is assumed that the trip rate values represent the ‘aggregated’ trip rate by combining the individual trip rate values for four primary schools, one secondary school and community uses. To illustrate the point further, data presented in Table 1.2 of the Technical Note – ‘Internalisation of Trips’ (Appendix G of the Transport Assessment refers) in respect of the Education/Community use is incorrect. It is stated in paragraph 1.5.13 that the secondary school will have an approximate Gross Floor Area of 10,000 sq m, yet the trip rate data in 9.1 (page 80) of the Transport Assessment specifies a floorspace of 5,000 sq m for Education and Community uses combined.

A breakdown of the trip rates derived from TRICS by individual use is requested, as well as the built footprint (GFA) for each land use. This information will enable the trip rate values contained within Table 9.1 of the Transport Assessment to be reviewed.

The quantum of floorspace contained within Table 9.3 (10,000 m2) has been “upped” from the quantum reference in the description of development (Section 6 ‘Proposed Development’ refers), in which “up to 9,000 m2 gross floorspace of Class A1 to A5 uses” is specified. The two values stated in the description of development and quantum of floorspace (Table 9.3) should correspond.

***v) Trip assignment from the Chilmington Green development***

It requested that a graphic is provided to show the traffic distribution for each phase of the Chilmington Green development. Beyond phase 1 the cumulative traffic distribution (i.e. phases 1 and 2 for phase 2) should be represented. This is necessary to ensure there is a modelled baseline assumption on record that can be used as a reference point for purposes of Travel Plan monitoring. It is envisaged that a similar graphic to that which was presented at the November 2011 Chilmington Green Stakeholder Workshop Transport and Movement presentation. The data presented at the November 2011 workshop indicated there would be 1691 AM peak hour departure trips (i.e. leaving the site), of which 67% would be assigned to the A28 northbound. This equates to 1,132 trips leaving the site in the Am peak hour heading northbound on the A28. The Transport Assessment states includes the following commentary in respect of the A28:-

*“This commuting flow acts as the predominant route in and out of the site with flows of approximately 700-800 vehicles”*

The commentary within the Transport Assessment assumes 700-800 vehicles utilising the A28 corridor in the AM peak, whereas data that has previously been presented demonstrated that the total vehicle movements in the AM peak moving northbound along the A28 would be 1,132. This is a difference of up to 432 trips, which is significantly and needs to be explained. Furthermore, the data presented in Figures 13.1 and 13.2 of the Transport Assessment is of too poor a grain to be interpreted.

Data presented within Table 9.5 of the Transport Assessment (Scenario 2 Vehicle Trip Distribution at Chilmington Green), the AM peak internal to external movements is 1990 trips. Applying the 67% assignment stated in the November 2011 presentation, this equates to 1333 trips leaving the site in the AM peak and moving northbound along the A28. This number of trips (1333) is far in excess of the assumed number of trips stated in the Transport Assessment.

Section 13.4 of the Transport Assessment also explains that *“in the morning peak, the arrivals are evenly split between the A28 and the use of A2070 from the east with approximately 200 vehicles on each. In this peak hour Magpie Hall Road is used by approximately 100 vehicles.”* The commentary accounts for arrival trips along Magpie Hall Road (100 trips) but does not suggest how the remaining (assumed) 100 trips will arrive to the site from the east (having interacted with the A2070).

It is suggested that Section 13.4 of the Transport Assessment is revisited in line with the above commentary.

***vi) Proposed Travel Plan measures***

Paragraph 5.3.5 of the Travel Plan, it is proposed that-

*” residents of the development will be offered an Ashford Megarider ticket which allows for one month’s free travel on local bus services operating via Chilmington Green, with the cost of £40 being met by the developers. To be eligible for this, residents will be required to complete and return a form provided by the site management company. These forms will be included within the travel information pack, with a letter explaining the scheme and detailing which tickets they can claim.”*

It is considered that the proposed offer of one month’s free travel will not do enough to change often entrenched behaviours and encourage an adequate number of residents of Chilmington Green to travel by public transport to achieve the mode share target. An offer of one year’s free travel per resident is requested as a strong commitment to achieving the necessary rate of take-up to meet the 20% modal share target. Furthermore, the ‘offer’ should be more flexible than simply being limited to a Megarider type ticket. For example, assuming the technology exists (and is available to use in the future), a bus travel debit card credited with a fixed amount of money would provide individual residents the ability to choose how to use a card locally for their own travel needs. This approach would ensure the contribution is not time limited.

As explained in paragraph 9.46 of the AAP document:

*“The developer will be expected to proactively incentivise use of the public transport service, including through the issue of free or subsidised season tickets, with a ‘toolkit’ of measures and further incentives identified that can be applied subsequently should there be risk that the target 20% mode share will not be achieved.”*

In accordance with the AAP text, it is important that certain measures can come into effect should it be shown that the public transport 20% mode share target is not being met.

Similarly, if future post-occupation monitoring demonstrates that certain traffic-sensitive routes are being more heavily-trafficked than the trip assignment modelling originally predicted, then appropriate measures will need to be taken by the developer to mitigate the impact of additional traffic. The traffic sensitive routes are considered to be those that will accommodate less than 15% of trips (arrivals and departures, either singularly or combined) generated by the Chilmington Green development. The relative assignment of trips onto the road network proximate to Chilmington Green has been requested in point v) above, and is of relevance here. It is deemed than a traffic increase of 15% on sensitive routes (as demonstrated as part of the post-occupation monitoring) above the modelled assignment is an appropriate trigger point at above which additional mitigation measures would be required.

There must be a firm commitment to the prevision of additional measures if identified at the post-occupation monitoring stage.

Monitoring of the Travel Plan will be essential to gain an understanding the effectiveness of the Travel Plan initiatives in achieving the objectives and targets for the development. Indicators will be established prior to the baseline monitoring and data will be collected by the following:

* Ongoing measurement of walking and cycling on the main connections through the development by use of permanent counters;
* Ongoing measurement of traffic entering and leaving the site via the principal access points by the placement of permanent loops in the carriageway; and
* Monitoring of total trips generated and modal share for each land use on a bi-annual basis through (for example):

- Household travel diaries;

- Employee travel plan questionnaires

* Monitoring of total trips generated and modal share for the school through and annual hands-up survey and staff questionnaire.

It is requested that monitoring report will be produced annually by the Travel Plan Co-coordinator and submitted to Kent County Council’s Transport and Development service. The monitoring report will enable the site travel plan group and Kent County Council’s Transport and Development team to ascertain whether the indicators are working towards targets.

It is also advised that the iTRACE (web enabled) procedure would be utilised by KCC to monitor the travel generating nature of the Chilmington Green development.

In the event that the Travel Plan is shown to be underachieving on the indicators, remedial action will need to be taken to put more resources into the agreed measures to get the Travel Plan 'back on track'.

It is proposed that Kent County Council’s Intelligent Transport are to introduce an Urban Traffic Management System within the 2012/13 financial year, though it should be noted that the network will have partial (rather than complete) coverage. Due to the importance of the A28 as part of the strategic network, then data collected at the key entry/exit points to Chilmington Green from the A28 Chart Road will be collected using permanent loops. The collected data will enhance the level of 'live' information coverage that we would collect for the local highway network. In order to accurately monitor the network, should additional investment in equipment to support a legitimate expansion of the UTMC is required as part of the traffic monitoring and management strategy, then it would be for the developer of Chilmington Green to fund any necessary infrastructure.

***vii) Proposed bus service to serve Chilmington Green***

Both the AAP and supporting material to the outline planning application propose a strong commitment to ensure that residents of Chilmington Green benefit from a high-frequency bus service with good connectivity between the site and Ashford Town Centre. An explanation is required to understand whether the 15-minute journey time for buses was the output of a modelling run (utilising the VISSIM model), or whether this was simply the output of a known measured travel distance and assumed average journey speed?

The journey time of 15 minutes between the site and the town centre is likely to require certain priority measures (at a number of junctions) to be implemented to ensure the stated journey time can be achieved. Accordingly, those Smartlink priority measures that are critical for ensuring a 15-minute journey time can be achieved should be delivered as off-site highway improvements attributable to the Chilmington Green development. The below passage of text has been drawn from the AAP, and explains what junctions would need to be improved to provide bus priority measures in order to facilitate a well connected bus service between Chilmington Green and Ashford town centre:

*“Bus priority measures between the Tithe Barn Lane/Knoll Lane junction and the Brookfield Road/Knoll Lane junction were originally planned as part of SmartLink. The proposed bus service would make use of these bus priority measures. A review of these measures will be undertaken to understand the latest costs and to determine the appropriate level of contribution that may be required from the Chilmington Green development.”*

In reality, if a 15-minute journey time cannot be achieved then this would have a knock-on effect on service frequency, unless additional buses were brought in to serve the route, with associated costs. A reduced level of service could impact bus patronage for journeys between Chilmington Green and the town centre, resulting in a mode share below the target of 20%.

The success (or otherwise) of a bus service between Chilmington Green and Ashford town centre depends in part on the degree to which Ashford Borough Council implement the aspirations of their town centre parking strategy as a ‘stick’ measure (by moving away from long term stay) in order to enhance the attractiveness of public transport, both to residents of Chilmington Green specifically, and more generally to the resident population of Ashford and its hinterland.

Figure 11.3 ‘Phased high frequency bus service route’ (Transport Assessment) does not show the commencement of a bus service through Discovery Park during Phase 2 of the Chilmington Green development. The detail of Figure 11.3 should accord with Figure 11.2.

The Ashford Transport Study proposed a bus mode share target of 30-35% to reflect a world in which Smartlink would be 'up and running'. These mode share figures were entered into the VISSIM model on which the Transport Modelling output has been based. In the time between when the trip rates were agreed and the final Masterplan has been agreed, the aspiration has shifted slightly from a  Smartlink-focussed scheme to a position whereby Chilmington Green is to be served by a high-frequency bus service, with a mode share target of 20%. There is some concern that was has not followed is an exercise to revisit the mode targets for non-bus modes in light of the shift from 30-35% downwards to 20%. The implications of this alteration in mode target for buses needs to be clarified in the context of the transport modelling exercise, as there is the potential for Chilmington Green to generate more non-bus trips (i.e. private car trips) that has been modelled for.

A pricing exercise was carried out to calculate the level of revenue support required to ‘kick-start’ and maintain the 20% mode share target for public transport. The output was shared with WSP’s Public Transport expert for comment, but thus far a response has not been received. The level of revenue support that is required to ‘kick-start’ a bus service must represent a robust estimate, otherwise service quality, and ultimately patronage take-up, will be compromised. Stagecoach, the principal bus operator in East Kent, have advised that the pricing model prepared by KCC did not allow for any adjustment for the continuing rise in the price of fuel (and the doubling of fuel tax paid on local bus services from 1st April 2012), and this needs to be taken into account in the cost side of the model. Further discussions involving Stagecoach, WSP’s Public Transport expert and KCC are required to reach agreement on the level of revenue support required to ‘kick-start’ a bus service that will achieve and maintain the target mode share.

It is important that the internal roads along which a bus service will be routed are sufficiently completed to enable a bus service to operate (and under licence, where necessary). In practical terms, this means the internal roads in question either need to have been adopted, or the bus operator is allowed to run under licence. The bus route will need to be kept free of construction traffic at all times.

The design of residential streets that are to be used by buses must include any measures (Traffic Regulation Orders, for example) to ensure that parking and servicing do not compromise frequency, flow and loading/unloading of passengers. The design and location of bus stops must guard against inappropriate residential parking along the alignment of the bus route. It is noted that Figure 11.3 of the Transport Assessment shows the proposed location of bus stops routes within the site. It is suggested that Stagecoach, the principal operator in East Kent, are engaged with to clarify that the proposed bus stops are sited in the most appropriate locations. The bus connection through Discovery Park is not shown on Figure 13.4.

***viii) Off-site physical measures required to facilitate bus route to the town centre***

The Smartlink Major Scheme Business Case (MSBC) proposed a route from Cuckoo Lane via Knoll Lane, Brookfield Road and Leacon Road/Victoria Way. This offered the most direct and least trafficked route into the town from the Chilmington Green development and the park and ride site and avoided congestion on the A28. To achieve the necessary speed and attractiveness, improvements and bus priority measures were proposed for the Knoll Lane/Brookfield Road and Brookfield/Leacon Road junctions, as well as bus lanes on Brookfield Road itself and localised widening and footway works elsewhere for Smartlink stations.

Analysis of budget estimates prepared by Jacobs in 2010 suggests that the cost of these works is estimated at c£2.5m. However, not all of these works would be necessary for the start of a Smartlink service, and certain measures could be deferred until a later date, as triggered by necessary highway capacity improvements. It is suggested that cost of delivering the 'must haves' required at the commencement of a bus service would be in the region of £1.8m to £2m, though this should be subject to a detailed cost exercise to be undertaken by the applicant. The funding of the physical measures to facilitate the necessary works should be secured through a S106 Agreement.

***ix) Proposed closure of Bartletts Lane to through traffic***

Figure 2 ‘Carriageway Widths’ to the Transport Assessment scoping letter (as contained within the appendices to the Transport Assessment) proposes the closure of Bartletts Lane in two locations, thereby permitting local access only to the area around the Chilmington Green Hamlet. This appears to have not been translated onto other drawings, for example drawing OPA05: Access and Strategic Routes Plan and Figure 6.1 ‘Proposed Development Access Points’. The rationale for proposing the closure of Bartletts Lane to ‘through-traffic’ was to preserve the character of the Hamlet, and to provide a suitable environment for the alignment of national cycle route NCR18. It was also proposed that Chart Road would also be closed to through traffic. The proposed road width for Mock Lane should be reduced from the proposed width of 6m (as shown on Figure 2) to reflect its position in the road hierarchy as a minor access to serve Chilmington Green.

***x) Off-site footway/footpath improvements***

The figure on page 38 of the Design and Access Statement and Figure 3.1 of the Transport Assessment show the road network within the study area. Pound Lane is not shown, despite the fact it provides a good east-west link in a similar manner to Magpie Hall Road. Accordingly, it felt Pound Lane will be used as a route to connect with the Ashford Road, particularly for access to/from the north-eastern part of the site for users that do not want to interact with Magpie Hall Road. Pound Lane does not benefit from a pedestrian footway/footpath from a point approximately 95 metres to the west of the junction of Pound Lane with Ashford Road. Local knowledge suggests this route is well used by pedestrians wanting to complete journeys between the residential estate to the north-west (connecting in at the cycleway/footway connection) to travel along Pound Lane to connect with Church Hill. The primary school is a strong attractor for pedestrian movements, and parents accompanying children is a sensitive user group. There have also been strong calls from the local community to provide a safe pedestrian connection along a length of Pound Lane. On the strength of this evidence, it is requested that provision is made within the S106 Agreement for the developer of the Chilmington Green development to a footway/footpath connection to serve Pound Lane to ensure that pedestrians are provided with a safe route, unless such a scheme is provided by another (separate) source of funding.

The walking and cycle routes plan, as shown on page 40 of the Design and Access Statement and Figure 3.2 of the Transport Assessment, is too tightly drawn, particularly the area to the east of the Chilmington Green eastern site boundary to give a broader impression of the footpath/footway and cycleway network.

***xi) Draft S106 Heads of Terms***

Discussions concerning the drafting of the S106 Heads of Terms and triggers for County Matters are still required. It is recognised that the actual requirements or the triggers for those requirements will change or indeed other means of providing or funding the requirements will be found. A report to Cabinet will be required. The key items that will need to form part of the Highways and Transport element are bulleted below:-

* Traffic Management: traffic Monitoring and Management Strategy, with capital and revenue contributions towards the monitoring of traffic flows upon the local network.
* Public Transport Services: Revenue contribution to meet the additional costs associated with local bus service provision
* Travel Plans: Revenue contributions (sum + associated measures) towards the implementation and monitoring of Travel Plan measures.
* Off-site Walk / Cycle Links: Capital contribution towards the construction of off-site walking and cycling schemes
* Off-site Public Rights of Way: Capital contribution towards Public Right of Way improvements.
* Public Transport Infrastructure / priority measures: Capital contribution towards the installation of bus stops and shelters, and physical bus priority measures to implement an express service between the site and the town centre
* Construction Management Strategy: Revenue contribution to meet monitoring costs associated with construction activity. The strategy will need to provide clear evidence that there are appropriate measures in place to restrict trips associated with construction activities from taking place during peak hour movements. A movement strategy for construction workers will also have to be submitted and agreed with the highway authority.
* Community Transport: Capital and Revenue contribution towards the costs of providing community transport services for the community.
* Commuted sums for maintenance: Revenue contributions to meet future maintenance costs arising from specific transport measures such as new signals or bus stops.

***xii) Suggested text amendments***

It is believed there is a typo contained within Table 2.1 of the Transport Assessment with respect to the proposed source(s) of funding for major schemes. The abbreviation “LIP” should be replaced with “LEP”.

There is a table reference error within paragraph 9.5.2 of the Transport Assessment, as the text references Table 7.1, whereas it should reference Table 9.1.

**Park and Ride SMARTLINK and Bus Services**

***Discussion Point*** (For KHS to consider and amend response accordingly) - Through discussions on CIL, Ashford are questioning the ability to deliver Smartlink particularly given other changes to their growth strategy and messages from govt re funding. Presumably until it is formally abandoned perhaps as part of Core Strategy Review we should be seeking appropriate contributions towards facilitating it. Our original response refers to provision of bus lanes - should these part of the proposed design for A28? This may be more of an internal question rather than part of our formal response but presumably we will need to chrystallise thinking before A28 scheme is finalised.

Even if SMARTLINK is eventually watered down contributions could be redeployed to related public transport improvements because have a bus lane Ashford Growth is predicated on 20% modal shift which is needed for transport capacity (as opposed to philosophical) reasons

In addition to offering free passes for 6-12 months should we also be offering subsidy for services for period of 5 years after completion of development. The first requirement relates to encouraging behaviours shifts the second relates to supporting those shifts in the longer term by enabling providers to maintain services.

**3. Drainage**

KCC has increased responsibilities under the Flood and Water Management Act (2010) and is awaiting commencement of its role as the drainage approving body (SAB). This requires the SAB to approve proposed sustainable drainage systems (SuDS) in new developments and redevelopments, subject to exemptions, thresholds and compliance with specific standards. Approval must be granted in order for the developer to commence construction.

The anticipated commencement date for KCC’s SAB role will be in 2013.  If planning applications are made prior to commencement of the legislation, drainage approval is not required. However, if conditions or reserve matters are not discharged within 12 months following commencement of the legislation, then drainage approval will need to be sought at that future date.

In this interim period prior to commencement of the legislation, KCC is consulting with Councils and applicants where a proposed development has drainage implications and which may due to submission timelines and construction phasing require future drainage approval.  If you would like to review the information published by Defra on sustainable drainage approval please refer to:

<http://www.defra.gov.uk/consult/2011/12/20/sustainable-drainage-systems-1112/>

KCC is providing advice to applicants to facilitate development of planning proposals which include a sustainable drainage approach.  Until commencement, any advice given is not binding in terms of validation for later applications and does not constitute a formal decision as requirements of legislation may change.

*Consultation Response*

The information included within the Design and Access Statement (D&A) and Flood Risk Assessment outline an extensive scheme for inclusion of sustainable drainage along existing drainage pathways.  Cross-sections provided within the D&A demonstrate inclusion on SuDS at street level.  The inclusion of green and blue corridors and the presumption against culverting is to be commended.  Particular comments are as follows:

1. It should be noted that in order to receive SAB drainage approval at detailed design, it will be necessary to clearly demonstrate inclusion of all aspects of the SuDS management train.  As detailed in Section 6 of the Flood Risk Assessment, this will require consideration of control of surface water at source.  In parking areas and in higher density locations this must not rely wholly on the use of permeable pavement, and consideration should also be given to the use of bioretention and other surface features.
2. The draft *National Standards for Sustainable Drainage* were published for consultation in December 2011. Defra has yet to finalise the standards and secondary legislation, but the draft document does indicate the requirements with which sustainable drainage will need to comply to gain drainage approval.  It should be noted that the draft National Standards specify discharge requirements which differ from the Ashford SPD and do not allow for any local discharge specification. KCC would advise that before any detailed design is undertaken, the position with the National Standards should be confirmed, and if still prior to commencement of KCC’s SAB responsibility, any design must be sufficiently flexible to be able to meet more stringent standards.
3. The FRA refers to consents required for works within ordinary watercourses for which “currently the Environment Agency’s consent is required”.  The changes in legislation came into effect on the 6th April 2012.  Consent is now required from Kent County Council by anyone who intends to carry out works in, over, under or near an ordinary watercourse.  Information on Land Drainage Consents can be accessed at:

<http://www.kent.gov.uk/environment_and_planning/flooding/how_we_manage_flood_risk/land_drainage_consent.aspx>

**4. Biodiversity**

*Surveys*

KCC’s Biodiversity Officer has undertaken a desk based review of the information supplied by the applicant. It is noted there are 5 Ancient Woodland Sites within or adjacent to the site, and 3 SSSI, 10 Local Wildlife Sites, 32 Ancient Woodland Sites, and 1 Local Nature Reserve are within 2km of the site.

KCC is satisfied the applicant has undertaken a sufficient range of habitat surveys. It is recommended that the surveys for the following species are reviewed to ensure best practice guidance has been followed, and sufficient information has been submitted to determine the application:

* reptiles,
* dormice,
* bats,
* water voles,
* wintering and breeding birds,
* invertebrates and
* great crested newts

It will be necessary to determine if they are present on the site. Should outline planning permission be granted it is expected that a detailed mitigation strategy and management and monitoring plan be submitted at the reserve matters stage. The results of the monitoring must feed in to the management plan.

All surveys must be carried out at the correct time of year and follow best practice guidelines.

We recommend that a management and monitoring plan is produced for the whole site. If necessary the management plan must be amended depending on the results of the monitoring.

Lighting can be detrimental to roosting, foraging and commuting bats. We advise that the Bat Conservation Trust’s *Bats and Lighting in the UK* guidance is adhered to in the lighting design (see end of this note for a summary of key requirements).

If planning permission is granted, any vegetation or buildings to be removed must be removed outside of the breeding bird season (March – August). If that is not possible an ecologist must examine the site prior to any works starting. If any breeding birds are identified all works must cease in that area until all the young have fledged.

The development is proposed to take up to 20 years to complete – as a result there will be a need for updated ecological surveys to be carried out prior to the reserve matters for each phase being approved.

*Enhancements*

One of the principles of the National Planning Policy Framework is that “opportunities to incorporate biodiversity in and around developments should be encouraged”.

The proposed development is proposing to create a variety of habitats within the new development. While this is welcomed, other enhancements can also be incorporated in the site – for example, roosting and nesting opportunities for bats and birds within the buildings.

*Bats and Lighting in the UK*

“Bat Conservation Trust and Institution of Lighting Engineers - Summary of requirements”

The two most important features of street and security lighting with respect to bats are:

1. **The UV component**.  Low or zero UV installations are preferred to reduce attraction of insects to lighting and therefore to reduce the attraction of foraging bats to these areas.
2. **Restriction of the area illuminated**.  Lighting must be shielded to maintain dark areas, particularly above lighting installations, and in many cases, land adjacent to the areas illuminated.  The aim is to maintain dark commuting corridors for foraging and commuting bats.  Bats avoid well lit areas, and these create barriers for flying bats between roosting and feeding areas.

*UV characteristics:*

Low

* Low pressure Sodium Lamps (SOX) emit a minimal UV component.
* High pressure Sodium Lamps (SON) emit a small UV component.
* White SON, though low in UV, emit more than regular SON.

High

* Metal Halide lamps emit more UV than SON lamps, but less than Mercury lamps
* Mercury lamps (MBF) emit a high UV component.
* Tungsten Halogen, if unfiltered, emit a high UV component
* Compact Fluorescent (CFL), if unfiltered, emit a high UV component.

Variable

* Light Emitting Diodes (LEDs) have a range of UV outputs. Variants are available with low or minimal UV output.

Glass glazing and UV filtering lenses are recommended to reduce UV output.

*Street lighting*

Low-pressure sodium or high-pressure sodium must be used instead of mercury or metal halide lamps.  LEDs must be specified as low UV.  Tungsten halogen and CFL sources must have appropriate UV filtering to reduce UV to low levels.

Lighting must be directed to where it is needed and light spillage avoided. Hoods must be used on each lamp to direct light and contain spillage. Light leakage into hedgerows and trees must be avoided.

If possible, the times during which the lighting is on overnight must be limited to provide some dark periods. If the light is fitted with a timer this must be adjusted to reduce the amount of 'lit time' and provide dark periods.

*Security and domestic external lighting*

The above recommendations concerning UV output and direction apply. In addition:

Lighting should illuminate only ground floor areas.  Light should not leak upwards to illuminate first floor and higher levels.

Lamps of greater than 2000 lumens (150 W) must not be used.

Movement or similar sensors must be used. They must be carefully installed and aimed, to reduce the amount of time a light is on each night.

Light must illuminate only the immediate area required, by using as sharp a downward angle as possible. Light must not be directed at or close to bat roost access points or flight paths from the roost. A shield or hood can be used to control or restrict the area to be lit. Wide angle illumination must be avoided as this will be more disturbing to foraging and commuting bats as well as people and other wildlife.

Lighting must not illuminate any bat bricks and boxes placed on buildings, trees or other nearby locations.

**5. Heritage**

KCC’s Heritage team has assessed the following documents and has the following comments:

Cultural Heritage is covered in the Non Technical Summary ES paragraphs 7.1.87 – 7.1.99 Cultural Heritage and Archaeology; ES Vol 1 Chapter 12 Cultural Heritage and Archaeology, and Chapter 17 Mitigation Measures; and Appendix 12 which comprises Archaeological Deskbased Assessment, detailed results on archaeological evaluation works and a Heritage Statement.

The application site lies within an area which contains known significant heritage assets and high archaeological potential, particularly associated with Iron Age and Roman activity. There is now considerable heritage information on this site, some of it from the HER and some from evaluation work undertaken specifically for this development. KCC welcomes this early evaluation work and the applicant’s attempt to support deskbased data with field data.

KCC has some concerns about the heritage assessment, and these are reflected in the absence of clear heritage conservation measures in the Masterplan and in what are regarded as totally inadequate heritage mitigation measures put forward in Chapter 17 of the ES.

*General comments on the ES Heritage Assessment*

The heritage data supporting the outline application is detailed but it is not clearly presented and in some areas it is misleading. It is essential that the baseline data and assessment presented at this stage is of high quality so that it can be used confidently to guide subsequent planning decisions.

Chapter 12 ES Vol 1 provides a considerable amount of information but there is limited interpretation of what the data means as a heritage resource in itself, and for the Chilmington Green development. The geophysical results do not seem to be interpreted at all, and some of the key data seems to be missing (plot G1 beside Chilmington Green village). The assessment of the HER is not up to date or in line with current academic interpretation. There are c180 HER sites within Chilmington Green development area, not 3.

Although there is a mass of heritage data to consider, the role of the cultural heritage assessment for this ES should include resolving the key issues which need detailed consideration, and which may be a constraint on the Masterplan proposals. The description, interpretation and assessment of the significance of some key heritage assets is inadequate and needs to be revised.

These key sites, based on present information, include:

* Brisley Farm Iron Age site and its environs (including Colman’s Kitchen Wood and the geophysical anomalies to the south)
* the Roman road network, including the branch off Magpie Hall Road heading to the probable Roman road junction within Stubbs Cross Wood
* and the concentration of possible remains possibly associated with the earlier community of Chilmington Green village itself.

These heritage assets could be constraints on the proposed layout of route-ways and land use zones as presented in the application.

It is appreciated that this is an outline application in which many details may be finalised in subsequent detailed applications, but it is important to highlight at this stage where important and sensitive heritage assets may be a constraint on any proposal, including ecological enhancement zones or higher density housing. Clear demonstration in the ES of the heritage assets that survive within the development site, with a suggested hierarchy of significance, would be welcomed. At present, the drawings are misleading because they are very selective about the data presented and are out of date. A quickly produced drawing showing of the HER at March 2012 is attached, although this does not show the results of all the evaluation fieldwork to which the applicant has better access. It is recommended that Figure 12.1 and Figure 3 of the DBA, Appendix 12.1, need to be revised and resubmitted using more up to date information.

It is recommended a more direct assessment of the probable impact of the development on the heritage assets is undertaken by superimposing the heritage assets over the Masterplan. This could demonstrate possible archaeological “pinch points” which may need to be considered more thoroughly prior to planning consent for this outline scheme.

Before a planning decision can be made on any of the proposals above, we need to know what the significance of the archaeological assets is in this area, and what the possible impact from the proposals set out above would be. The NPPF requires an applicant to:

“*describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.* ” (NPPF Ch12 paragraph 128).

It is recommended this approach is applied to Brisley Farm Iron Age site and to the other key heritage assets within Chilmington Green. There needs to be more direct assessment of the significance of the key heritage sites in order to ensure informed planning decisions can be made at this early outline application stage before details are finalised.

*Mitigation measures*

In addition to the historic buildings mitigation, detailed mitigation measures need to be set out for buried archaeological remains. This should include the preservation in situ of important archaeological remains, or preservation by record following a programme of evaluation and assessment. The NPPF still regards heritage assets as “*an irreplaceable resource*” which should be conserved “*in a manner appropriate to their significance.*” This means avoiding needless destruction of archaeological remains and viewing excavation as a ‘least preferred’ option. It is much preferable and more sustainable to leave archaeological remains in the ground, and only where preservation in situ is not possible should excavation of archaeological remains be considered. The heritage mitigation measures should follow this approach, and it is recommended they should be revised.

It is recommended that an *Archaeological Framework Strategy* is agreed outlining a clear programme of archaeological work within an agreed timetable, highlighting initial stages of evaluation then assessment, followed by consideration of preservation in situ or preservation by record. An Archaeological Framework Strategy needs to be agreed prior to determination of this application.

This prestigious development is due to be implemented in at least four phases over 20 years, so any mitigation measures need to be robust and clearly integrated into the Phased development plan. Within the timeframe of this development there is an opportunity to deal with the historic environment assets in a cost effective and strategic framework. Detailed mitigation measures should be agreed prior to detailed planning consents.

KCC would welcome the inclusion of long term management measures, and the interpretation of significant archaeological remains preserved in situ could be covered by a S106 Agreement. KCC would welcome further discussion of the possibility and suitability of some heritage issues being addressed through a S106 Agreement.

*In summary*

It is recommended the following issues are addressed prior to planning consent for this outline application:

1) Figures 12.1 Chapter 12 ES Vol 1 and Figure 3 DBA Appendix 12.1 need to be revised and re-submitted.

2) The applicants need to formally submit a copy of Appendix 12.5 – Evaluation Report (Plots B & C) by Wessex Archaeology

3) There needs to be a specialist, detailed assessment of Brisley Farm Iron Age complex, including Colemans Kitchen Wood and the geophysical anomalies to the south, and of the potential for significant remains to survive on the development site; and of the implications of the development, especially Coulter Road/Cuckoo Lane Mini Roundabout Access; the road heading west; the tree planting around Colman’s Kitchen Wood; the housing south of Brisley Farm, and the housing south west towards the present Chilmington Green.

4) There needs to be clearly presented consideration of historic lanes, footpaths, field boundaries and how they are to be integrated into the Masterplan with reference to the Historic Landscape and Built Heritage Appraisal by Wessex Archaeology (Appendix 12.2);

5) There needs to be consideration of further evaluation for targeted areas where there is a need to ensure avoidance of conflict between development proposals set out in the Masterplan and significant heritage assets “pinch points”;

6) An Archaeological Framework Strategy needs to be agreed which will:

* Set out a programme of further archaeological evaluation works (historic landscape assessment, trial trenching, geophysical surveying, test pitting etc) which will be undertaken per phase of development, before detailed planning applications are submitted.
* Set out as a 2nd stage per each phase of development, assessment of the evaluation works followed by detailed mitigation measures which will be agreed prior to detailed planning application being submitted;
* include as a preferred mitigation option, preservation in situ of important archaeological remains. If preservation in situ is not appropriate, preservation by record will be agreed.
* Set out post excavation and publication programme for the entire Chilmington Green development covered by this outline application.
* Arrangements for long term deposition of archive and accessibility for future reference.

7) Agreement on preservation in situ of significant heritage assets and their settings, possibly as *Archaeological Protection Zones*, and possibly set out in a S106 Agreement.

8) Proposals for heritage enhancement measures and for heritage interpretation for the future communities.

**6. Public Rights of Way**

KCC is pleased that the proposal diverts the existing PROW network into areas of green space, including the diversion of the Greensand Way recreation walking route. There are a number of positive re-alignment proposals of PROW, and the proposed new bridleways are welcomed and supported. There are however a few important matters which remain unresolved, and are summarised below:

1 A28 improvements.

a) In order to meet the prescribed cycling targets it is essential that a continuous Cycle Route be provided on the North/West Side of the proposed A28 improvements between the Matalan and Tank roundabouts. The current route is not continuous and diverts into the Godinton Park estate. The link to Godinton is still important and should be retained, but to achieve a connected cycle network, in line with others in the area, it is essential that a continuous route alongside the road is also provided.

b) Suitable cycle crossings must be provided on the Repton Park and A28 “town” arms of the Tank roundabout, the Loudon Road Junction and the Northern arm of the Matalan roundabout. Island crossings are not suitable to provide safe cycling at these points.

2. NCN18. The planning documents make much of the cycle distance between the site and the Town Centre and rail station. The current alignment of NCN18 is the most direct, obvious route and promoted link to the town centre. While the internal network provided appears excellent, the links to the town centre are unacceptable. Recommendations were previously made to stop up Bartletts lane at the northern end to retain its rural character and to avoid the inevitable rat running. The lane is also the route of NCN18 and it is not acceptable to promote cycling and secondary vehicular access along the existing lanes without intervention.

KCC would therefore insist that the route shown for NCN18 is designed to prevent vehicular access. The suggestion made to stop up roads in figure 2 “carriageway widths” in the Transport Assessment appendices is supported and must be carried forward into the planning, for NCN18 to continue to be promoted. In its current design Mock Lane and Bartlett Lanes cannot be promoted as cycling routes out of the proposed development. Development of new traffic free routes through the ABC Environment Centre land should also be made to avoid having to share the narrow section of Bucksford Lane.

3. Attached is a plan of the existing PROW network transposed onto the development Master Plan. It is essential that the development team contact the County Council’s Countryside Access Service at an early stage to discuss the changes to the numerous routes affected.

4. A few of the routes on drawing 7.4. Movement Hierarchy are incorrectly shown. The route shown to the North of Great Chilmington is currently a footpath and should be shown as a proposed bridleway. The proposed bridleway shown on the pedestrian cycling plan linking from the John Wesley School to the planned discovery park is not shown on drawing 7.4, but should be shown as a proposed bridleway as this would add significant value to the recreational resource as well as providing a direct link to the school and attached cycle network.

5. Public Right of Way AW219 between Mock Lane and Chilmington Lane would provide a direct link to the District centre. It would significantly reduce the walking time and distance and should be designed as an arterial walking avenue in line with objectives set out in the Transport Strategy.

6. The Greensand Way should be re-aligned along the proposed bridleway to the North West of the development and not along Mock Lane.

7. The Public Right of Way linking to Long Length, number AW297, is currently a public footpath and should be shown as a proposed bridleway, not existing.

8. The proposed bridleway to the South East towards Tally Ho does not currently connect to Tally Ho and will need to do so. This will be a very useful connection to the development and high frequency bus routes.

9. A new pavement or public footpath should be created on the south side of Magpie Hall Road to connect Stubbs Cross to the new development and services.

In recognition of both the scale and complexity of this project, Kent County Council is keen to contribute effectively to detailed negotiations going forward including on the Section 106, evolution of the master plan, details pursuant applications and provision planning and will ensure that all relevant service departments engage at the appropriate stages. KCC would consider appointing dedicated resources and joint legal support if this could be funded through the development. NB This is something ABC has hinted at in the past but need to test in next draft.

In summary KCC broadly supports the provision for County Council infrastructure within the planning applications. However, additional or amended information and discussion are sought with regard to highways, heritage and PROW before determination of the planning application. KCC would also meet the applicants to discuss other service provision, notably schools, if helpful.

I trust you find the comments above useful and should you require any further information please do not hesitate to contact me.

Yours sincerely

Paul Crick

Director of Planning and Environment