



Mr R. Mellor
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BY EMAIL ONLY

Growth, Environment & Transport

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Ask for: Barbara Cooper
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Your ref:
Our ref: GT/BC/JAC
Date: 16 February 2017

Dear Mr Mellor

RE: Maidstone Borough Local Plan Examination – Sutton Road

I refer to your letter dated 3 February 2017, in which you request clarification on a number of factual matters relevant to mitigation works on Sutton Road. Our responses to your questions are as follows:

- a) There is currently **no conclusive evidence** to demonstrate that the bus lane scheme presented in the A274 Corridor Study¹ can be delivered entirely within land forming part of the publicly maintainable highway. The drawings within the study are titled as 'preliminary designs' and therefore provide only an illustrative level of detail. I must therefore disagree with your comment that they are 'detailed layouts' as they are clearly not intended to be interpreted as such.

With this in mind it is unclear how MBC has arrived at the view that the scheme is, for the most part, contained within the publicly maintainable highway (as defined within the Highways Act 1980). No highway boundary information, which could have been obtained from KCC, is presented to demonstrate this to be the case. This underlines the **theoretical** rather than practical basis on which these proposals have been conceived and presented.

It is also important to take account of what land take may be necessary to achieve a technically compliant scheme. On those sections of the route where little or no verge is available for carriageway widening purposes, the scheme design relies upon the narrowing of the existing footways. These narrowings are significant in places, with up to 1.7m of footway width proposed to be removed. The proposals do not confirm whether additional land may be required to maintain a suitable footway width along these sections of the route. This represents a fundamental requirement in view of the potential implications of narrow footways on pedestrian safety.

¹ TRA 028/028A 'A274 Sutton Road Corridor Study' (Mott MacDonald, April 2016)

It is unclear what is being referred to as 'land that is likely to be owned by Maidstone BC' and the County Council is unable to comment on whether such land, if it could be made available by MBC or the relevant third party, would be sufficient to achieve a deliverable scheme.

- b) The County Council has not undertaken a detailed appraisal of what land would be required to implement the bus lane scheme. At no time since the publication of the A274 Corridor Study has the County Council wished to pursue such a scheme, given the **clear and evident concerns** expressed over its effectiveness. We are also **unaware of any formal decision made by MBC** to reinstate it within their Integrated Transport Strategy, rescinding the decision of the MBC Strategic Planning, Sustainability and Transportation Committee on 15 December 2015.
- c) The A274 Sutton Road/Willington Street and Wallis Avenue junction improvements are currently programmed for implementation over the period October 2017 to April 2018 as part of the Maidstone Integrated Transport Package.
- d) Initial design work undertaken in support of the Maidstone Integrated Transport Package has indicated that only marginal capacity gains are achievable through improvements contained within the confines of the publicly maintainable highway. Further work has also been completed to explore whether the approach lanes can be lengthened within the highway boundary to achieve greater capacity benefits.

At this stage it is uncertain whether land acquisition would be required to achieve capacity gains that are sufficient to mitigate the impact of the planned developments. Any assessment of future conditions will also need to account for the **potential effects of induced traffic** on other junctions along this corridor, most notably at the Wheatsheaf, which will have a large bearing on the overall effectiveness of operation. Such considerations underline **the importance of a strategic plan-led approach to mitigation in this part of Maidstone**, a position we have consistently maintained.

- e) The County Council **strongly refutes** the suggestion that officers have refused to engage with the Borough Council's consultants. The Borough Council commissioned the A274 Corridor Study independently and the views of the County Council were not sought prior to publication.

We have continued to be responsive to all requests for input by MBC throughout the Local Plan preparation process. Considerable resources, including consultant fees in excess of £80,000, have been committed in developing the **jointly commissioned VISUM** traffic modelling, which has provided a **robust understanding** of highway network conditions under a range of different scenarios. The County Council is **utterly** disappointed that the Borough Council has chosen to **completely ignore (without any justification)** the findings of the jointly commissioned modelling work in favour of pursuing an independent study founded on a **piecemeal** form of mitigation that is not supported by either authority.

In concluding, I would again draw your attention to the statutory role of the County Council, as Local Highway Authority, in providing advice on the transport infrastructure necessary to support planned residential growth. We remain extremely concerned that

our **robust and compelling evidence** on the known constraints to development and the need for **strategic forms of mitigation** have not been fully accepted (or indeed even acknowledged) in your Interim Findings report and would implore you to reconsider such matters when compiling your Final Report.

Yours sincerely

A handwritten signature in black ink, appearing to read 'B. Cooper', written in a cursive style.

Barbara Cooper
Corporate Director
Growth, Environment & Transport

