

Draft Maidstone Integrated Transport Strategy 2011-2031

Schedule of issues and responses following the consultation period 5 February to 18 March 2016

Key issues	Detail	Officer response	Officer Recommendation
SE Maidstone			
1. Roads in SE Maidstone are at capacity. The further development that is planned for this area of Maidstone along the A274/A229 will have a severe and unacceptable impact on the network including many unsuitable local lanes and roads that will be used as rat-runs.	i) Work undertaken by Kent County Council shows the roads in SE Maidstone A229/A274 to be unable to accommodate additional development. The proposed developments would have a severe adverse impact on the highway network, in terms of congestion and inconvenience to local residents and other road users, and on the strategic transport planning of the area generally. This would be contrary to the aims of NPPF paragraph 32.	The results of strategic and localised transport modelling subsequently published demonstrate that following mitigation through highway capacity, public transport and walking/cycling improvements, the residual cumulative traffic impact of the developments cannot be regarded as severe.	Amend section 11 (The Modelling Context) to provide commentary on the results of the most recent modelling.

	<p>ii) KCC has a current policy of opposing development which has a cumulative impact on the Wheatsheaf junction. Major works are needed at the junction along with, ultimately, the Leeds Langley by-pass (agreed cross party at the JTB) to mitigate congestion, without such measures pollution and congestion at this part of Maidstone will become intolerable.</p>	<p>Minor works at the Wheatsheaf identified by KCC, i.e. making Cranbourne Avenue entry only from the junction, would enable an additional 340 vehicles in an hour being able to pass through the junction and mitigate the impact of development currently proposed.</p>	<p>Amend section 11 (The Modelling Context) to provide commentary on the results of the most recent modelling.</p>
	<p>Fully support the inclusion of the schemes supported by the South Maidstone Action for Roads and Traffic (SMART) group at the A229 junction with Sheals Crescent and the adjustment of the A229 / Armstrong Road junction to allow A229 vehicles travelling south to use a third lane for turning (using the unused northbound lane after the lights). I also support the creation of a partial lay-by for the bus stop at the Swan pub to allow traffic to pass and the relocation of several stops on the A229 to allow better traffic flows near the Armstrong Road and Wheatsheaf traffic lights.</p>	<p>Support for SMART proposals noted.</p>	<p>No change</p>
	<p>iii) There will be an unacceptable impact on Gore Court Road and Otham Street/Otham Lane from the traffic associated with the all the new houses in SE Maidstone. There will be no space for walkers and cyclists or horse riders.</p>	<p>Walking & Cycling Strategy actions SEM4, 5 and 6 outline the measures proposed to create high quality routes for non-car users to, from and within the SE Maidstone housing sites. Further details are provided in the Transport Assessments/Travel Plans supporting the individual planning applications, and will be subject to agreement with KCC.</p>	<p>No change</p>

<p>2. The ITS fails to support the volume of vehicular traffic that will be generated by the development proposed in the Local Plan.</p>	<p>The ITS fails to support the volume of vehicular traffic that will be generated by the development proposed in the Local Plan. Late delivery of proposed traffic schemes already appears to be most likely, with the attendant issues that will cause.</p>	<p>The results of strategic and localised transport modelling subsequently published demonstrate that following mitigation through highway capacity, public transport and walking/cycling improvements, the residual cumulative traffic impact of the developments cannot be regarded as severe.</p>	<p>Amend section 11 (The Modelling Context) to provide commentary on the results of the most recent modelling.</p>
<p>3. The appeal decision by the Secretary of State for the New Line Learning site in Boughton Lane indicates that the road network is severely congested with no apparent mitigation.</p>	<p>This appeal decision indicates that conditions on the A229 ('Swan'/Cripple Street) and at the Wheatsheaf junction are already severe and that as no scheme of mitigation had been identified traffic for the proposed development will only make an existing bad situation worse.</p>	<p>The appeal decision has now been quashed in the High Court.</p> <p>However, work commissioned by the Council relating to the Boughton Lane/ A229 / Cripple Street junction demonstrates that mitigation can be undertaken and capacity improved.</p> <p>Work is on-going in conjunction with the County Council relating to the A229/A274 Wheatsheaf Junction to identify and secure mitigation and capacity improvements.</p>	<p>No change</p>
<p>4 Leeds Langley By pass</p>	<p>i) This road is clearly much needed and should be built now as a priority to assist in the mitigation of traffic growth.</p>	<p>The published outputs from the Maidstone VISUM model suggest that the reassignment of traffic from the urban area with the road in place is limited and that the beneficial impacts of the proposed road upon congestion have not been conclusively demonstrated.</p> <p>As a very high cost intervention, the</p>	<p>No change</p>

		<p>justification for this road depends on enabling development in the vicinity of its route. No evidence is available at the time of writing to indicate the extent of enabling development which would be required to support the proposed road, or the feasibility and desirability of this development.</p> <p>Furthermore, given the need for a detailed route assessment, environmental impact assessment, sustainability appraisal and a more detailed analysis of costs and benefits in general, this scheme would require delivery over a longer timescale.</p> <p>The Council is nevertheless willing to work with KCC to progress this scheme once sufficient evidence has been assembled to prove that it is viable.</p>	
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	<p>ii) The evidence within the wider DITS shows that for the current draft of the Local Plan, the Leeds-Langley Bypass is not necessary to meet the overall Objectively Assessed Housing Need to 2031. The VISUM modelling discussed later in the DITS and previously at the Maidstone Joint Transportation Board confirms that the Local Plan can be supported through an approach balancing local highway improvements with measures to increase walking, cycling and public transport provision. It is our view that the Leeds-Langley Bypass can act as a distraction and should only be looked at as part of a forthcoming Local Plan Review. Therefore support the Council's view in paragraph 9.74 that such a project may be feasible post 2031</p>	<p>Support for Council's position noted</p>	<p>No change</p>
<p>Impact on Rural Service Centres</p>			
<p>5 The extent of development proposed in the Rural Service Centres which are isolated from employment centres will be unsustainable. Residents will be forced to rely on the private car as public transport to these settlements is poor</p>	<p>i) The extent of development proposed in the Rural Service Centres which are isolated from employment centres will be unsustainable due to the lack of reliable and affordable public transport to residents will be forced to rely on the private car.</p>	<p>The ITS indicates that the Council will work with Kent County Council and the bus operators to improve frequency and reliability of services to and from the Rural Service Centres and Larger villages. Each Rural Service Centre also has designated existing and/or proposed employment areas.</p>	<p>No change</p>

	<p>i) There are plans for substantial housing development in the Weald and the document fails to address the issues of infrastructure links to and from the town.</p>	<p>The ITS indicates that the Council will work with Kent County Council and the bus operators to improve frequency and reliability of services to and from the Rural Service Centres and Larger villages. Each Rural Service Centre also has designated existing and/or proposed employment areas.</p>	<p>No change</p>
<p>6 Bus services to the Rural Service Centres</p>	<p>There is a need for substantial improvements to existing bus services linking Staplehurst and the other Rural Service Centres to Maidstone. There are particular gaps in services to/from Staplehurst in the early morning and early evening</p>	<p>The ITS indicates that the Council will work with Kent County Council and the bus operators to improve frequency and reliability of services to and from the Rural Service Centres and Larger villages. Each Rural Service Centre also has designated existing and/or proposed employment areas.</p>	<p>No change</p>
<p>7 Rural bus services</p>	<p>Bus services to many of the villages are already poor and many are subsidised and are under increasing threat from funding cuts. The suggestion within the ITS that the primary objective is to get more people walking, cycling and using public transport is laughable and demonstrates how little consideration to over 50% of the MBC electorate (found in the parishes) is not given a passing consideration.</p>	<p>The ITS indicates that the Council will work with Kent County Council and the bus operators to improve frequency and reliability of services to and from the Rural Service Centres and Larger villages. Each Rural Service Centre also has designated existing and/or proposed employment areas.</p>	<p>No change</p>
<p>8.Action PT8: Promote the provision of high quality bus</p>	<p>i) This will be a significant challenge to achieve on a commercial basis.</p>	<p>Comments noted.</p>	<p>No change</p>

<p>services from the rural service centres including interchange facilities at rail stations.</p>	<p>ii) A fast bus service is not possible in to Maidstone from rural service centres such as Staplehurst, due to the severe congestion from Linton Hill onwards, which takes up to an hour to navigate in rush hour. Our children's bus service was recently re-timed to 6.45AM to be able to reliably achieve a 8.15 drop off time in Maidstone. Without re-designing the traffic layout through the Coxheath crossroads, throughout Loose and in to Maidstone, it does not matter how fast or reliable the bus seeks to be. An alternative is to look at revising routes, (the eventual solution to providing a later timed bus), as the congestion will prevent any bus service from improving</p>	<p>Comments noted. The Council is working in partnership with Kent County Council to secure appropriate junction capacity improvements to ease the flow of all traffic including Public Transport the schemes are set out in the ITS and the Maidstone Borough Local Plan</p>	<p>No change</p>
<p>Park and Ride</p>			
<p>9 New park and ride facility should be introduced on land to the south of Cripple Street Loose</p>	<p>A new park and ride facility should be introduced on land to the south of Cripple Street, Loose (some 500-550 spaces and possibly a Cycle and Ride/Park and cycle facility).</p> <p>Given the deletion of the Park and Ride site at Linton Crossroads this site provides a viable and available alternative.</p>	<p>The proposed site is located 400m west of the A229 which will require buses to negotiate the A29/Cripple Street junction with possibly adverse impacts on its operation. Rat running may also be encouraged along roads west of the proposed site. Together with the difficulty of delivering comprehensive bus priority measures this means that providing a tangible journey time saving for P&R users would be challenging and affect the long term viability of the scheme.</p>	<p>No change</p>
<p>10 General comments on Park & Ride</p>	<p>i) A replacement Park and Ride facility should be provided for the south and north of Maidstone</p>	<p>The Council remains committed to maintaining the existing Park & Ride services.</p>	<p>No change</p>

	<p>ii) Local Plan contains no strategy for searching for new possible sites in the north and south of the town.</p> <p>iii) The previously proposed Park & Ride Site at Linton Crossroads should be reinstated to help address the severe traffic problems on the southern approaches to the Town Centre.</p> <p>iv) How does the closure of the 506 Park and Ride Service fit in with the desire to reduce congestion in the Town Centre?</p> <p>v) The Council should identify areas where land can be purchased to enable a revised P&R scheme from the north side of the town.</p>	<p>If appropriate alternative sites that are acceptable in environmental, traffic and locational terms, were to become available these would be considered.</p> <p>No such sites are currently apparent.</p>	
Public Transport (Buses)			
11 The ITS as a means of supporting the Spatial Strategy for new development	<p>Bus services are most effective and efficient where they can provide direct, fast journeys to the town centre and other attractors, minimally affected by other traffic.</p> <p>Focussing development close to primary transport corridors, such as the A274, where bus services are already running at high frequency, with appropriate transport infrastructure will create the best opportunity for buses to provide a viable alternative to the private car for many journeys.</p>	Comment supports the strategic ITS objectives.	No change
12 Bus priority measures on key strategic routes to the Town Centre. (Action PT1)	Very supportive of these as punctuality and speed of journey are a fundamental requirement for attracting passengers.	Support noted.	No change
13 Romney Place bus-lane (Action PT1)	Very supportive of this proposal as, particularly at peak times of other traffic flows, delays occur here for around 20 inbound journeys an hour.	Support noted.	No change

<p>14 Priorities at/changes to traffic signals (Action PT1)</p>	<p>Very supportive of the proposals listed and would add the following:</p> <p>Bus activated signals are required at the junctions of Earl Street with Fairmeadow and at the junction of Fairmeadow with St Faith's Street for buses (approx. 7 per hour) travelling north from Earl Street towards Maidstone East Station. Similarly bus activation of the signals enabling the right turn from Royal Engineers' Road into Chatham Road for buses serving Ringlestone when travelling towards Maidstone needs to be reintroduced.</p> <p>These measures will significantly improve bus journey times with little or no impact on other traffic.</p>	<p>Suggestions noted.</p>	<p>Amend Action PT1 to incorporate these proposals, stating that the Council will work with KCC to assess their deliverability and acceptability.</p>
<p>15 Action PT2 : Facilitate an improvement of bus services to ensure a good frequency of service provided by high quality buses is provided on all radial routes to the town centre within the Maidstone Urban Area.</p>	<p>i) Support all the above proposals in principle and are working towards the proposals on a commercially sustainable basis. However, the success of improving bus services to the new developments on the southern side of the A274, to the east of Parkwood Trading estate is for buses to be able to link through the developments – ie a road link (possibly bus only) between the proposed Rumwood Green and Langley Park Farm developments.</p>	<p>The Strategic Planning, Sustainability & Transportation Committee agreed at its meeting on 18 April 2016 to recommend to the Local Plan Inspector a change to the criteria relating to policy H1(5) (Langley Park Sutton Road) to require such a link to be provided.</p>	

	<p>ii) The actions for Public Transport under PT1 and PT2 are wholeheartedly supported. These seek to provide bus priority measures and increase bus service frequency and quality, which again underpins the Council's overarching sustainable, balanced approach. It is noted that this works towards achieving the aims under the Do Something 2 (DS2) VISUM modelling scenario discussed later in the DITS; this scenario offering the best overall outcome in terms of the units of measure used (journey time, distance etc.).</p>	Noted	No change
	<p>ii) Welcome the potential to increase Service 5 to 30 minute frequency but the service must be reliable, which is unlikely given the traffic congestion on the A229 Loose Road and therefore people will not use it.</p>	The mitigation measures identified for the Boughton Lane/Cripple Street and Wheatsheaf junctions would improve operating conditions for general traffic including buses.	No change
	<p>iii) Reducing the need for travel or enabling other more sustainable modes to be more attractive is to be supported in order to reduce the impact of increasing levels of traffic congestion.</p> <p>Careful consideration needs to be taken of the impact of integrating infrastructure for more sustainable modes eg use of bus lanes by cycles.</p>	Comments noted.	No change
<p>16. Action PT4: Continue to engage with and facilitate statutory Quality Bus Partnership (QBP) schemes in Maidstone</p>	<p>Support the QBP on the basis that its objectives, if implemented successfully, should produce a win-win situation with increased passenger numbers and reduced traffic.</p>	Comments noted.	No change

<p>17. Action PT6 Improvement of services between Maidstone Town Centre, M20 junction 7 and Sittingbourne/Faversham</p>	<p>i) With respect to Action PT6, which sets out an aspiration to increase bus service frequency for services to Sittingbourne and Faversham and the M20 Junction 7 area to 15 minutes, it is our view that this should concentrate on enhancements using local looped routes as opposed to long distances routes to neighbouring towns, which should primarily serve the interests of inter-urban passengers by providing fast and direct journeys that are competitive relative to the car. Bus services can be extremely expensive to improve, particularly those covering long distances, which give less opportunity to serve significant increased patronage. There is a risk that too high a frequency over a long distance can impact on viability, therefore it is our view that shorter loop services travelling around the Maidstone suburbs are both more cost effective and likely to yield greater patronage uplift and mode share increase, whilst underpinning long term commercial viability. Developers should not be expected to wholly fund the long distance service improvements to Sittingbourne and Faversham, a role that is much better played by commercial bus operators and a Quality Bus Partnership. Improvements to bus information set out in PT13 are supported.</p>	<p>Employees working in the Junction 7 are likely to travel to work from a much wider catchment than the Maidstone urban area, including from Sittingbourne and wider Swale. A local looped route will serve a much smaller range of origins/destinations, and have few other intermediate patronage sources. Arriva is already investigating the scope to increase frequencies to 20 minutes from the current 30. A further increase to 15 minutes would encourage a situation where passengers can “turn up and go” and short term financial support for this improvement is considered more likely to lead to long term commercial viability than funding a local looped service.</p>	<p>No change</p>
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	ii) There is an urgent need to improve this service and to extend its availability later into the evening and at weekends. Services often get delayed and despite this many are overcrowded with people needing to stand for long parts of the journey.	Comment noted.	Amend Action PT6 to specifically refer to the need for improved evening/weekend services as well as higher daytime frequencies.
18. Action PT7: Provision of a North West Maidstone Bus Loop	Support the proposal which, in order to maximise potential use, should be implemented at the earliest opportunity after first occupation takes place.	Comment noted	No change
19. Action P4: Improve parking enforcement on highways to reduce the impact of obstruction on bus reliability	Very supportive of this action which will reduce unnecessary delays and enable buses to access kerbside at bus stops so those with mobility difficulties can board and alight the bus safely.	Support noted.	No change
20. Improvements and interventions at Staplehurst Station	Staplehurst Sustainable Transport Package is all at the station; states here that other issues require further work to determine specific interventions. How/when will this be done? Must be guided by Staplehurst Neighbourhood Plan.	Comments noted. The ITS and supporting Walking and Cycling Strategy are living documents and as such specific interventions will need to be developed in more detail in partnership with local stakeholders.	No change
21. Bus services in Marden	Improved bus services serving Marden are required, especially to the town centre and both Maidstone and Pembury Hospitals (Objectives 1B and 2, Actions PT8 and RMB14).	Action PT8 is intended to address this requirement.	No change.
22. Maidstone Bus-Station	<p>Agree that the existing bus station is not fit for purpose. However no plan for providing a new station is shown. There should be similar vision to that which provided the new bus station in Chatham.</p> <p>Why can't the Robins and Day showroom site in Palace Avenue be used? This is centrally located and would remove many buses from the High</p>	Refurbishment of Maidstone Bus Station is currently the subject of a Local Growth Fund 3 bid, to complement the medium term investment plans of the Mall shopping centre. Initial work has identified the scope for potential improvements to the attractiveness and operation of the facility.	Amend Action PT12 to summarise the work undertaken since the DITS was published.

	Street and King Street. Agreed that this needs replacing/updating. Lighting could be improved further, cleanliness improved, more seating provided, a large part is unprotected from outside weather. There is not enough room for buses and they often get delayed by car queuing for the car parks in the area. The closure of the Arriva office was a mistake there is no one with authority in the station. The opaque glass should be replaced with clear glass to assist passengers.		
23. There should be a required minimum standard and age of buses.	There should be a required minimum standard and age of buses. Old more polluting buses should be forced to be withdrawn as they are a poor advert for public transport.	Being addressed via Action PT4.	No change
24. There should be greater ticket flexibility	More work should be done in ensuring greater ticket flexibility, such as removing the ban on buying return tickets before 9am. This is particularly important for services leaving large towns which are often empty at that time. Conversely buses between 9:30 and 10:30 are often over-crowded	Comments noted. The issue of flexible ticketing is being addressed via actions PT4 and PT13.	No change
25. Greater connectivity between timetables between buses and also between buses and trains	Timetables should be better coordinated at major interchanges and towns so that passengers are not forced to wait unacceptably long times to change services to for onward connections.	Acknowledge the desirability of this. With multiple operators and routes to be co-ordinated, the key is to increase service frequencies to a level which minimises interchange time. The ITS seeks to deliver high bus frequencies on Maidstone's radial corridors (Action PT2) and improve bus interchange capabilities at Maidstone East and West rail stations (Action PT11).	No change

Public Transport (Rail)

<p>26. Action PT9: Lobby Government and Train Operating Companies for improved rail services to Maidstone</p>	<p>Welcome any proposals for improved rail services from any stations within the borough but concerned that no mention is made of the Mayor of London and TfL's proposals to take control of services on the lines from Kent into London. Concerned that TfL will monopolise train paths for the inner services to the detriment of services from outer Kent, i.e. within Maidstone Borough.</p>	<p>Comments noted</p>	<p>Amend section 9 to acknowledge TfL proposals. Also to stress under Action PT13 the need to promote and further develop integrated bus/rail ticketing.</p>
	<p>The following statement is included under PT9: "9.40 High Speed 1, where Southeastern serves many Kent towns into and out of St Pancras via Ebbsfleet in most cases does not benefit Maidstone. It is now possible to travel from Ashford to London in less than 40 minutes, whereas Maidstone East to Victoria still generally takes more than 1 hour, even though Ashford is many miles further from London than Maidstone."</p> <p>Don't disagree with the main thrust of this statement. However, there are still benefits to be had from HS1 which provides an alternative route from the centre of London which is generally very reliable, as well as a connection with East London, at Stratford which may grow in importance.</p> <p>Unfortunately, these benefits are cut short by the relatively early closure of the Medway Valley line for the evening. What's more, this</p>	<p>Comments Noted. The Council is seeking the introduction of an all-day service connection to HS1 as part of the on-going preparation for consultation on the new South Eastern franchise. The Council has already made known its views to Kent County Council and also to the Department for Transport and Transport for London following recent consultation exercises, and will continue to do so as the opportunity arises.</p>	<p>No change</p>

	<p>early closure also limits the use that Maidstone residents can make of other rail services in North Kent. Extending the hours of operation of the Medway Valley line to match those of the rest of the network would be one way of addressing these deficiencies. Another way would be through reliable connections with buses, although that would require integrated services and ticketing which is a desirable objective in itself.</p>		
27. Train stations in the Weald	<p>i) It is noted in the document that many commuters in Maidstone travel to rail stations in the Weald, in preference to those in the town. By inference many of these will be from the southern parishes of Maidstone. Section 17.142 makes mention of these commuters, but there is little in the document's proposed transport strategies that seeks to specifically address such issues; just increasing the frequency of the number 5 bus is unlikely to help especially when KCC is apparently currently seeking to further reduce its subsidies on this route!</p> <p>ii) Welcome improvements to the bus/rail interchange at Staplehurst Station</p>	<p>A reduction in the level of service on route 5 is not anticipated given that the frequency improvements will be funded by developments in Staplehurst. Support for Staplehurst rail station improvements is welcomed and this will improve bus/rail connectivity as well as pedestrian/cycle access from the village. A key aim of the Walking and Cycling Strategy is to create cycle routes to rural public transport hubs using a mixture of quiet lanes and shared use footways.</p>	<p>No change</p>
28. Railway Service improvements: Action PT9	<p>Please include the Marden – Staplehurst – Headcorn line in this note.</p>	<p>Noted and agreed</p>	<p>Acknowledge this line under Action PT9 – but service quality on this line is good and leads to many Maidstone commuters using this line rather than the stations in the town, as</p>

			the ITS acknowledges.
	ii) Has consideration been given to how the rail route could be optimised to encourage rail access from rural locations to Maidstone? Many people in rural villages already have an annual season ticket, that provides discounts for family members.	Noted and agreed	Amend ITS to cite the role of the Medway Valley CRP in promoting increased use of rural rail stations.
	iii) Please specify if this relates just to Maidstone, or to all rail stations across the Maidstone Borough?	Noted and agreed	Amend Action PT9 to read "Lobby Government and Train Operating Companies (TOCs) for improved rail services to the Maidstone urban area".
29 Transport interchanges (PT11) are too focussed on Maidstone	Why is maximising interchange capabilities limited to urban Maidstone stations? Please include other rural service centres with main line train services, with well used bus services that provide onward journeys (e.g. mainline train to Staplehurst, #5 bus service connects on to Cranbrook and Hawkhurst).	Noted and partially agreed	Add a further Action to cite the interchange improvements already programmed for Staplehurst.
30. Transport user groups	The Weald has a rural Transport User Group, that meets with bus companies from across Kent and East Sussex to discuss issues. Please can we ask that a bullet point be included to specify that "bus companies should seek to meet regularly with existing Transport User Groups, from across the Borough	Agreed.	Provide additional commentary under Action PT4.
31. Involvement of rail operators/ rail infrastructure providers	What input have South Eastern and Network Rail had into this document?	There is ongoing engagement on transport issues through the LSTF West Kent Working Group.	No change

32. Re-open Teston Halt	Consider re-opening Teston Halt. This was closed at the end of the 1950s. We assume the suggestion that it is re-opened relates to the fact that it is adjacent to what is now Teston Bridge Country Park and there is an expectation that visitors will travel to it by train along the Medway Valley Line. We are not aware of any survey of the “source” of current visitors to the Country Park, but it is rather unlikely that a significant number live conveniently close to a railway station that would easily service a re-opened Teston Halt; that road-based traffic would continue. There may be the aspiration to encourage those living in the town to walk to Maidstone West station, or persons living near relevant stations to use the Maidstone Valley Line, to reach Teston Halt, but, except for special events, usage is unlikely to be material. It is very unlikely that Teston Country Park would generate sufficient rail-based visitors to justify the re-opening of Teston Halt.	Agreed. The Council is seeking to establish the reintroduction of such a scheme and has commented as such to the recent DFT/TfL and KCC Consultations on rail franchising. This is included in Action PT10	No change
33. Marden Station	Major improvements required to Marden railway station including additional parking provision to accommodate increased demand arising from housing development in the wider station catchment area (Objectives 1D and 3, Action RMB14) and step-free access to the ‘down-line’ platform (Objective 5, Action RMB14).	The scope for additional car parking provision needs to be carefully considered so as to meet demand without discouraging access by sustainable modes. However, the need for rail stations to be accessible by all modes, including by the mobility impaired, is recognised.	Amend Action PT5 to incorporate access improvements for Marden Station.
34 Crossrail 2	The Council should be investigating to see if any benefits from this scheme could accrue to the Borough	The route of Crossrail 2 as currently indicated would not seem to have any benefits for the Borough. The Council will continue to monitor the	No change

		project as it moves forward	
Cycling and Walking Measures			
35. Cycling and walking.	Planned/proposed improvements need to be effectively and steadfastly promoted even in the light of some community opposition.	Support for walking and cycling proposals noted.	No change
36 .New cycle route from NLL to Maidstone Town centre	With the removal of the proposal to close the exit of Cranbourne Avenue which I have championed on behalf of local residents, I would like to see a cycle route designated from NLL to town via Pheasant Lane / A274, Cranbourne Avenue, Marion Crescent, Plains Avenue, through alley to South Park Road and alone West Park Road and Willow Way.	Suggestion noted.	Incorporate within Walking & Cycling Action Plan, feasibility of proposal to be investigated through detailed audit.
37. Cycle to work targets	The targets in chapter 10 of the DITS, to aim for only a modal shift to 3% of work trips by bicycle in 2031 are too modest. With an enhanced infrastructure for cycling we believe that the council should be aiming for a cycling 5 of 6% to 10% of all journeys to work by 2031 and a much higher proportion of all journeys to school.	The targets have been identified to be realistic and achievable. Para. 10.6 stresses that the DITS is designed to be a living strategy which can adapt to changing circumstances. As such, there is scope to modify this target in future years as part of the monitoring and review process.	No change.
38. General actions relating to cycling	Actions in the report are supported, namely: C1, C2, C3 C4(a), C4(b), C5, C6, C7, C8, C9, C10, C11, and C13.	Support noted	No change
Highway schemes and Capacity Improvements			
39 . Action H1: Targeted implementation of highway improvements at key strategic locations to relieve congestion.	The Wheatsheaf junction should be re-modelled to enable its use as a shared space scheme	This has been considered by the County Council as part of its recent A229 corridor study and was not taken forward as an option	No change

40. Extra roads should be built	i) Extra roads should be built to provide additional capacity. E.g. Hermitage lane will have lots of extra houses but will not be widened	The results of strategic and localised transport modelling demonstrate that following mitigation through targeted highway capacity improvements, public transport and walking/cycling enhancements, the residual cumulative traffic impact of Local Plan developments cannot be regarded as severe.	No change
	Where are the proposals to widen and improve Upper Stone Street to provide the previously proposed dual carriageway extension from Bishops Way via Upper Stone Street to Loose Road?	Localised capacity improvements – fine. But building urban dual carriageways will induce new vehicular traffic, detracting from the objectives of the ITS. and adversely affect air quality.	No change
	A By-Pass dual carriageway to the SOUTH of Maidstone from Leeds Castle junction M20 through to the Wrotham junctions would long-term solve almost all the problems. A tunnel or high-level carriageway along the route of the M20 from junction 8 to Wrotham would also solve the horrendous truck congestion of the outskirts of town.	Although these proposals would undoubtedly increase highway capacity, their feasibility and acceptability would have to be investigated via detailed route assessment, environmental impact assessment, sustainability appraisal and detailed analysis of costs and benefits. Funding sources sufficient for what would be an extremely high cost intervention are currently unclear.	No change
41. Capacity improvements at the Wheatsheaf junction	i) How will this be achieved?	The Council in conjunction with the County Council are working on schemes to improve capacity at this key junction. The commitment to secure improvement at the junction is set out in the ITS and the Local Plan	No change
	ii) This junction needs a scheme to be implemented as soon as possible as the junction is already congested.		

	iii) A shared space scheme should be implemented	This has been considered by the County Council as part of its recent A229 corridor study and was not taken forward as an option	No change
42. Objective A is all about walking and cycling. Pavements in Staplehurst need improvement	There is a need to sort out pavements in Staplehurst as many are uneven and too narrow for disabled and elderly people.	The Walking and Cycling Strategy recommends a detailed audit of the Borough's walking and cycling corridors to identify missing links, gaps or barriers. Staplehurst would be included in this review.	No change
43. Capacity improvements at Linton Crossroads.	i) The ITS refers to capacity improvements at Linton Crossroads, but is unclear on the detail.	A mitigation scheme has been designed that does not rely on third party land and funding is being secured through s106 agreements	No change
	ii) This junction needs a radical solution to address traffic from the new housing development at Marden, Staplehurst, Boughton Monchelsea and Coxheath as well as any Leeds-Langley bypass		
44. A229 junction with Marden Road and Headcorn Road Staplehurst	i) No detail as to how improvements at this junction will be achieved.	This is a preliminary design which establishes the principles of a mitigation scheme which can be delivered within the highway boundary. The potential negative impact on pedestrians has been acknowledged but alternative routes are available with the scope for signage and crossing infrastructure to promote their use. This will be considered further as the design is progressed.	No change
	ii) What has been proposed to-date however is likely to reduce pedestrian safety as pavements are likely to be narrowed and a crossing removed.		
45. Sutton Road/Loose Road Bus-lane	i) Whilst improvements to bus services are needed, there should be no revised proposal for the introduction of a bus lane	Bus priority measures are essential for fast and reliable bus services which provide an attractive	No change

	<p>along the A274/A229 from Wallis Avenue to Armstrong Road</p> <p>ii) There is much greater scope for bus priority measures on the A274 than Loose Road.</p>	<p>alternative to the private car as well as access to essential amenities for non-car owners. The A274 Sutton Road Corridor Study includes preliminary designs which confirm that bus priority measures are technically feasible without detriment to general traffic.</p>	
46. NW Maidstone in particular the A26/Fountain Lane junction	<p>The road improvements in the Fountain Lane area be brought forward as soon as possible so that they can be implemented before the completion of the developments on Hermitage Lane, otherwise it won't be physically possible to do it, even if it's only carried out at night time.</p>	<p>Noted. Timing for the scheme is included within the s106 agreements relating to approved development. The Council is working in conjunction with the County Council to deliver schemes early as appropriate and where possible</p>	<p>No change</p>
47. A249 between M20 Junction 7 and M2 Junction 5	<p>Large development areas as proposed in the draft Local Plan will inevitably increase traffic using the A249 between the M20 and the M2 junctions. The Plan does not pay reference to this and as yet there are no specific plans to upgrade the road from its current substandard level. It is clearly unacceptable to recommend sites for major development when these essential matters have not been addressed.</p>	<p>Comment noted. At the J7 masterplanning meeting on 10 March 2016 Highways England raised the need for KCC to consider the interaction between these motorway junctions.</p>	<p>KCC to confirm what study is being or will be undertaken to consider future traffic flows on the A249 between Sittingbourne and Maidstone. Amend ITS to reference the work being undertaken.</p>
48. Highway needs in rural locations	<p>What consideration has been given to major Highways needs in rural locations? Whilst it is admirable we have 13 policies to promote cycling, for the 1 in 2 residents who live in more rural areas, cycling is simply not an option, due to the terrible road surfaces, lack of safe routes and steep approaches. These communities need investment in their roads to be of decent</p>	<p>The importance of well-maintained highway infrastructure is fully recognised. Action W4 identifies the need for a review of Personal Injury Collision (PIC) data involving vulnerable road users in order to prioritise areas for safety improvements. The Walking and</p>	<p>Amend ITS to reference speed control measures.</p>

	quality, with good signage and speed controls where loss of life, or serious accidents are frequent.	Cycling Strategy also identifies a network of rural cycle routes along lightly-trafficked lanes. The Council has also agreed to commence a study of roads in the Borough where 20mph limits could be pursued	
49. Heath Road/Westerhill Rd/Stockett Lane junction Coxheath	How has it been determined that this junction will continue to operate satisfactorily? Many people park on the roads close to the junction and hinder its safe operation.	Assessment has been undertaken using industry standard PICADY transport modelling software, taking into account future Local Plan growth. The scope for enhanced parking enforcement in this area will be investigated (Action P4).	No change
Parking			
50. Stagger school opening and closing times	School opening and closing times should be staggered to reduce tidal flows of school-based/bound traffic, particularly on the A229.	Comment noted.	Amend the commentary for Actions W5 and C8 to note the potential benefits of staggered opening/closing times, to be pursued through the School Travel Plan process.
51. Introduce a 'Red-Route' on the one-way system in Maidstone	Has inclusion of a red route – similar to those utilised in inner and outer London, been considered for the one way system around Maidstone? (For example coming past the “old Cinema” and up Lower Stone Street).	The benefits of red routes on major road corridors in large cities are recognised. However, in the first instance the enhanced enforcement of existing restrictions is considered the most appropriate way forward (Action PT4), with the situation being kept under review and the feasibility of other interventions, such as red	Amend Action PT4 to stress that other interventions will be investigated if ongoing monitoring indicates that this is appropriate.

		routes, investigated if the existing restrictions prove to be insufficient to maintain reliable bus operations.	
52. Action P1 Parking Standards	Supports the Council's vision on parking within P1 . Evidence-based parking standards allow for the positive planning of development with the correct level of parking to serve residents and employees	Support noted	No change
53. P3 Maintenance of current levels of parking provision in the Town Centre	Does not wholly support P3 , in that work carried out by MBC in 2011 by JMP Consultants confirms a significant level of oversupply within the total parking stock, and this is land that could be used for other purposes. Furthermore, excessive parking supply attracts car trips into the town centre when these trips are well catered for by public transport and cycling in particular. We suggest that alternative wording could be presented here allowing the Council flexibility to continually review town centre parking supply to make best use of land and associated income streams.	Agreed	Amend Action P3.
54. What about pavement parking and other hazards to pedestrians?	The strategy is obsessed with walking and cycling and yet fails to deal with prolific pavement parking and also hazards caused by overhanging trees and hedges, bins left on pavements and cyclists using footpaths	These are detailed issues which a strategy is unable to capture adequately. However, the Walking and Cycling Strategy recommends that a detailed audit of the Borough's walking and cycling corridors is commissioned. This will enable any barriers to movement, such as those identified in the representation, to be identified and mitigation measures developed to address these.	No change.

Strategic Road Network			
55. Impact on Strategic Road Network	<p>Highways England remain supportive of the principles of this document which are consistent with the NPPF. The document seeks to promote sustainable modes of transport, achieving reliable vehicle journey times and supporting sustainable development.</p> <p>We do however need to see evidence that the approach to the transport strategy is sound. The approach should assess the impacts of the full element of the Local Plan that to date has not received planning consent.</p>	<p>Localised modelling at M20 junctions 5 to 8 is being commissioned to assess the capacity of these junctions with the full Local Plan allocations, as the Maidstone VISUM model does not model these in detail.</p>	<p>Amend ITS to note the further modelling being undertaken.</p>
56. Lower Thames Crossing	<p>i) This appears not to have been taken into account and neither have the traffic implications of such a route on Maidstone Borough.</p> <p>ii) It is noted that the Transport Strategy makes only passing reference to the Third (or Lower) Thames Crossing proposals. The strategy refers to this as being at a relatively early stage; whilst also highlighting the potential for work to commence in 2020/21 with potential opening in 2025. The need for a Lower Thames Crossing is well established and the options process has advanced to the stage of considering approach routes for a crossing between East Tilbury and Gravesend. The current consultation process, active at the time of the publication of the DITS, was primarily considering options for the route north of the river. There is little doubt that this proposal will progress and that it</p>	<p>This is a scheme at an early stage in preparation. Initial public consultation was undertaken early in 2016. The Government/HE announcement of the way forward for the scheme is expected later in 2016. The scheme that was subject to consultation did not include proposals to upgrade the A229 link between the M20 and M2 on cost and environmental grounds. As such the potential impact on the Borough is considered to be fairly minor.</p>	<p>No change</p>

	<p>should be a significant material consideration for the development of the DITS and the spatial planning of the borough. It also evident from the outcome of the Strategic Planning, Sustainability & Transportation Committee (8th March 2016) that MBC fully support the proposed crossing and are aware of the significant economic benefits that could be derived from the new crossing. However, there is a little evidence from DITS and the Local Plan that it supports that any attempt has been made to effectively spatially plan to take advantages of the opportunities.</p> <p>The Lower Thames Crossing will provide a significant new piece of infrastructure in the local area, with supporting additional infrastructure such as potential widening of the M2 west of junction 5, and will present the opportunity for significant economic development through new connections for the northern areas of the borough. Development to the south of the M20 and Maidstone town will be restricted from taking advantage of these opportunities; constrained as it is by the limitations of the town's radial, rural roads. Residual demand for use of the route from development to the south will further burden these restricted areas of the network. Development to the north of the borough presents the best opportunity to take advantages of the opportunities arising from this new infrastructure, without undue pressure</p>		
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	on the County Town.		
57. Emerging technology and trends	Whilst Walking and Cycling issues take up a large section of the DITS document, considerably less space is given to addressing the effect of new technologies and demographic changes, especially the aging population, on the future of transportation. Whilst some might feel that the increase in uptake of electric or hybrid vehicles might address issues of Air Quality/Pollution. The DITS document notes the current lack of charging points around the Borough. There is little mention of the upside of developing alternatives such as driverless vehicles and managed light transport systems and the downside of increased delivery traffic caused by the uptake of remote shopping.	Noted. The ITS and the Walking and cycling Strategy are both 'living' documents and will be reviewed. The Council will monitor such developments and their potential implications and revised both as appropriate.	No change
Environmental Issues			
58. Air Quality	i) The ITS proposals will do little or nothing to improve air quality in the urban area. The data relating to air quality is out-dated and	The most recently available air quality data was cited; however this will be reviewed as part of the work to	Review most recently available air quality data in finalising ITS and Walking &

	should be refreshed	finalise the ITS. The ITS sets out a balanced package of transport interventions to enhance and encourage sustainable travel choices, i.e. reducing single occupancy car travel. Delivery of these interventions, alongside encouragement of ultra-low/zero emissions vehicles, will have a tangible impact on air quality in the medium to long term.	Cycling Strategy.
	ii) The existing monitoring equipment is ill-maintained and/or located in the wrong place	The Council is part of the Kent Air Quality Partnership through the Mid Kent Shared Environmental Services Department. The existing stations are regularly monitored and their positions reviewed. For example a new installation has been undertaken in Hermitage Lane and the equipment located at the Bridges Gyrotory will be moved to a new location.	Liaise with Mid Kent Environmental Shared Service team to ensure monitoring equipment is sited correctly and maintained.
59. Groundwater protection	Where transport infrastructure is proposed in Source Protection Zone 1 for a water supply abstraction, drainage strategies must have sealed drainage.	This is a matter for detailed design or (if required) a planning application	No change
60. Action UL/Zero Emissions 1 and H6	Supported. One of the most significant barriers to the uptake of alternative propulsion vehicles is the availability of charging/filling infrastructure, and the Council can play a role in improving this type of infrastructure within its own car parks and sites. Zero emissions vehicles play a role in reducing air quality effects of transport, from	Support Noted	No change

	which Maidstone can benefit significantly.		
Content of the ITS			
61. Failure to agree the ITS with Kent County Council	It is a matter of public record that the Borough Council's proposed housing provision has been heavily criticised by the County Council – despite the fact that the County Council itself has promoted a number of its own sites for residential development. In addition to this, no solid evidence has been put forward by the County Council that justifies its contention that the objectively assessed housing needs of Maidstone are incorrect. This conflict has had severe implications on the working relationship between both authorities, not least of which has been the failure to agree on a transport strategy. Indeed, the DITS effectively acknowledges this in para. 1.3, where it states that Maidstone's transport network has come under increasing strain on account of the growing demand for travel. It is a fact that if there is no strategy and no investment in transport infrastructure, then things will only get worse.	The Council continues to work with the County Council towards an agreed ITS. The Highway intervention and sustainable transport measures have been agreed by both Councils.	No change
62. The modelling work to support the ITS is not sufficient	The appraisal of the objectively assessed need (OAN) promoted in the Local Plan is referred to in the DITS as scenario DS4, or the fourth Do-Something Scenario. Critically the three prior scenarios DS1 to DS3 were historical and tested options under the previous Local Plan housing allocation numbers of circa 10,000 across the plan period. Full details of the testing of scenario DS4 have thus not been presented,	The results of strategic transport modelling scenario DS4b, testing the Objectively Assessed Need of 18,560 housing units, demonstrate that following mitigation through highway capacity, public transport and walking/cycling improvements, the residual cumulative traffic impact of the developments cannot be regarded	Amend section 11 (The Modelling Context) to provide commentary on the results of the most recent modelling.

	<p>such that it is not possible to ascertain how well the scenario reflects the spatial distribution of growth as now proposed.</p> <p>With a single model scenario considered to assess the implications of the spatial planning policy and the transport strategy to support it, it is apparent that the DITS is simply a reactive strategy seeking to mitigate the impact of Local Plan aspirations. In fact, there is no evidence of genuine transport network spatial planning options appraisal on the basis of the OAN housing numbers.</p>	<p>as severe.</p>	
<p>63. The positive aspirations of the ITS in will not reduce the demand for travel as they are not reflected in the spatial strategy and resultant allocations in the local plan</p>	<p>Reducing the need to travel can realistically be considered to mean reducing the need to travel on the wider network. Very local traffic generation within the confines of the immediately local area or, for instance, within a single development site is sufficiently inconsequential travel as to be consistent with not travelling.</p> <p>One of the key ways in which spatial planning can contribute to the aim of reducing demand for travel is to seek greater levels of mixed use development, which bring together the origins and destinations of trips, such that external travel is minimised.</p> <p>With appropriate selection of sites and promotion of sustainable travel measures, there is significant scope for large scale mixed use sustainable development to deliver wide</p>	<p>The aims and objectives of the draft ITS are fully reflected in the spatial strategy being pursued. The Maidstone urban area is the principal focus for development in the Borough with the regeneration of the town centre, residential development at strategic locations to the southeast and northwest of Maidstone and employment uses around M20 Junction 7 providing mixed use developments in close proximity to existing transport infrastructure whilst delivering mitigation measures where necessary. These mitigation measures comprise a package of highway capacity improvements, enhanced and extended bus services and high quality walking and cycling</p>	<p>No change.</p>

	<p>spread benefits across the district. For instance, a large mixed use development could deliver significant infrastructure in the form of Park & Ride and significantly enhanced bus services.</p> <p>Such infrastructure would derive benefits beyond the immediate locality, in particular reducing traffic demand in the congested central areas of Maidstone town. Again these positive aspirations of the DITS have not proactively contributed to the spatial planning and resultant allocations.</p>	<p>routes integrated with the existing network.</p>	
<p>64. The ITS will not effectively change travel behaviour</p>	<p>i) In reactively seeking to mitigate the OAN in the emerging the Local Plan the DITS can at best hope to achieve a marginal change in travel behaviour as a residual benefit. The apparent majority of infrastructure proposals set out within the Infrastructure Delivery Plan (IDP) are localised highway network and junction improvements aimed at mitigating the impact of site allocations. This is evident from paragraphs 2.2 to 2.7 of the IDP, which comprehensively summarise the highways interventions but make only passing reference to sustainable travel measures.</p> <p>The evidence base supporting (but not published with) the DITS is focused on assessing the implications of the highway interventions. The inability of the modelling framework to model much of the sustainable initiative is in large part due to the relative insignificance of these</p>	<p>The aims and objectives of the draft ITS are fully reflected in the spatial strategy being pursued. The Maidstone urban area is the principal focus for development in the Borough with the regeneration of the town centre, residential development at strategic locations to the southeast and northwest of Maidstone and employment uses around M20 Junction 7 providing mixed use developments in close proximity to existing transport infrastructure whilst delivering mitigation measures where necessary. These mitigation measures comprise a package of highway capacity improvements, enhanced and extended bus services and high quality walking and cycling routes integrated with the existing network.</p>	<p>No change</p>

	<p>measures. The model is insufficiently detailed to reflect, for instance, marginal changes in bus frequency. This should not be seen as a criticism of the modelling framework – as in practice the benefits are likely to be relatively negligible.</p> <p>The modelling framework would demonstrate the benefits of more significant changes in the spatial planning and supporting strategy. For instance a significant shift in the site allocation strategy towards objectively more sustainable development, such as demonstrated through a comprehensive strategic allocations options appraisal, would derive benefits. Again, this is less about the merits and abilities of the modelling framework and more the tangible benefits of alternative spatial planning strategies in seeking to change travel behaviour.</p>		
	<p>ii) Welcome the document and aspirations to encourage people to get out of their private vehicles in favour of walking, cycling or using public transport however this document fails to address the issue that many residents face:</p> <ul style="list-style-type: none"> • They have large distances to travel. • The infrastructure, especially footways in rural areas and bus services, do not exist. • The closure of local facilities means that they have to use their vehicles to access shops, GPs etc. 	<p>It is acknowledged that for residents living in rural areas in particular the private car will continue to be the most realistic option for many journeys. However, targeted improvements to encourage sustainable travel choices, especially for short journeys, will contribute towards the improved operation of the local transport network.</p>	<p>No change</p>

<p>65. The ITS fails to effectively promote modal shift</p>	<p>i) More significant and effective sustainable transport initiatives could also apparently demonstrate the change in travel behaviour through the promotion of modal shift sought through the DITS. Maidstone is not unique in being a district with a key focal town, which attracts much of the employment, retail and leisure travel demand, but which suffers from notable town centre congestion. Maidstone is also not unique in having responded to this previously through the introduction Park & Ride infrastructure which seek to directly change travel behaviour and reduce the number of people seeking to travel by car into the town.</p> <p>Despite the objective, the IDP makes no reference to park and ride and includes no measures related to it. When it is considered that the current facility at Sittingbourne Road has recently closed, it is apparent that measure within the IDP fail to maintain the existing provision of park and ride and certainly do not enhance it.</p> <p>In many cases Park and Ride can be delivered successfully as part of strategic development, where the public transport facilities can fulfil a dual function of serving the P&R facility and providing sustainable travel for the supporting development. The benefits of this approach can be extended further if the P&R is integrated to mixed use development, which has the scope to</p>	<p>The aims and objectives of the draft ITS are fully reflected in the spatial strategy being pursued. The Maidstone urban area is the principal focus for development in the Borough with the regeneration of the town centre, residential development at strategic locations to the southeast and northwest of Maidstone and employment uses around M20 Junction 7 providing mixed use developments in close proximity to existing transport infrastructure whilst delivering mitigation measures where necessary. These mitigation measures comprise a package of highway capacity improvements, enhanced and extended bus services and high quality walking and cycling routes integrated with the existing network.</p>	<p>No change</p>
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	<p>generate bi-directional demand, further contributing the viability of the services.</p> <p>An ideal location for new P&R facilities would be to the north of the borough, in particular on the A249 corridor, thus replacing the facility lost at Sittingbourne Road. A new facility on the A249 could provide multiple benefits. It would allow the significant demand for movement between Swale and Canterbury coastal towns to be captured before progressing in the congested areas south of the M20. It could be supported by significant infrastructure enhancements such as a dedicated additional lane for buses, prioritising bus travel towards Maidstone town further encouraging non-car travel.</p> <p>Finally, a P&R in this location when brought forward with major mixed use development could support significant enhancements to the public transport links between Swale and Maidstone, such as through development pump-primed bus services.</p>		
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	<p>ii) Believe that whilst the overall aims of the policy are valid and will be of great help, the policy is missing the elephant in the room - that the majority of journeys will continue to be by car. i.e. the stated chance of modal shift is over optimistic. The SHLA is creating large number of house in two areas of the borough in particular that will generate many new car journeys. The transport policy does not address these. Most will wish to reach the motorway to travel elsewhere. Key transport routes e.g. Willington Street, Hermitage lane will be over stressed. The river crossing system will continue to be 'full'. There simply aren't even mentioned proper measures to address this. So, proper motorway access must be factored in, otherwise the transport plan's goals will be under-realised.</p> <p>Have to mention the Leeds bypass of course. Without that the 'busy Sutton Rd corridor' all the way to the Medway will only become worse - with attendant pollution putting off walkers and cyclists and making priority bus journeys theoretical.</p> <p>Support less car reliance. But doesn't think this plan can deliver it.</p>	<p>The aims and objectives of the draft ITS are fully reflected in the spatial strategy being pursued. The Maidstone urban area is the principal focus for development in the Borough with the regeneration of the town centre, residential development at strategic locations to the southeast and northwest of Maidstone and employment uses around M20 Junction 7 providing mixed use developments in close proximity to existing transport infrastructure whilst delivering mitigation measures where necessary. These mitigation measures comprise a package of highway capacity improvements, enhanced and extended bus services and high quality walking and cycling routes integrated with the existing network.</p>	<p>No change</p>
<p>66. The ITS fails to improve network efficiency</p>	<p>By failing to fully explore options for spatial planning for the OAN through the DITS, the Local Plan does not demonstrate that wider network is being efficiently utilised.</p>	<p>The A249 corridor is largely within the designated Kent Downs AONB. Development to the north of the M20 would not be well related to existing sustainable transport</p>	<p>No change</p>

	<p>This focus of concern on the southern areas of the borough is a logical consequence of the configuration of the strategic highway network. Kent is served by two internationally important highway corridors, the M20 and the M2, both of which lie in the north of the borough and north of the Maidstone Town. The southern areas of the borough connect to the strategic network by means of a limited number of feeder routes, such as the A229 which routes through Maidstone Town to get to the M20 and beyond to the M2.</p> <p>A spatial development plan that includes a focus of development to the south of the borough inevitably increases pressure on the local roads and the Maidstone town network. By contrast, development to the north, particularly strategic mixed use development in proximity to the strategic highway network, could significantly enhance the efficient use of the transport network. More efficient use of the existing network would reduce the need for mitigation intervention and provide the scope for increased sustainable travel interventions.</p> <p>The DITS makes limited reference to the emerging proposed improvements to Junction 5 of the M2. Although the junction lies principally just outside the Borough Boundary, the improvements have a significant role to play in supporting growth within Maidstone. The junction serves as key link, via the A249, to the</p>	<p>networks and thus would create a culture of car dependency.</p>	
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	<p>strategic corridor of the A2 to the east and the A249 itself as it continues north. The Government, through Highways England, are committed to spending up to £100 million on the improvements which will address existing capacity constraints and provide the opportunity for significantly enhanced access to the strategic network. In focusing on localised mitigation of impact, the DITS does little to explore the opportunities for spatial planning that can take advantage of these significant enhancement.</p> <p>Development focused to the north of the district, beyond the M20, would have the unique opportunity to take advantage of both the enhancements to Junction 5 and the new Lower Thames Crossing; in order to provide sustainable and significant economic growth in the Borough, with limited impact on the more constrained parts of the highway network.</p> <p>It is apparent the stated objective of the DITS is not reflected in the spatial planning within the Local Plan. The failure to explore the options for significant development in the north of the Borough results in opportunities to maximise the efficient use of the existing and rapidly emerging transport network.</p>		
67. ITS monitoring and review	The targets set out for mode shift in 10.2 are wholeheartedly supported. The DITS is correct that these targets need to be 'realistic and	Support noted.	No change.

	<p>ambitious', and the Council should not be afraid of seeking to use targets which at the current time appear difficult to achieve. Technology on personal transport is rapidly changing, particularly in respect of alternative fuel and autonomous vehicles, and at such a pace that these technologies could be widespread within the term of the ITS. Evidence of this is in the Tesla rapid charging station located at Eclipse Park, which allows a vehicle to recharge to a 300 mile range in less than half an hour.</p>		
<p>68. VISUM strategic modelling</p>	<p>The DITS is correct in its reporting on the evolution of the Maidstone VISUM model since 2007/08, although being a very detailed process there is a great deal of evidence showing apparent misreporting by KCC on the most advantageous outcome from each of the scenarios tested. Since 2015, a number of different scenarios have been tested, as confirmed within the DITS, but the reporting of each scenario outcome has been inconsistent and has, acted to confuse the outcomes presented by the model and the most advantageous approach to underpin the Local Plan.</p> <p>Agree with the DITS statement in 11.16 that VISUM, being a strategic highway model, is unsuited to the assessment of individual junction capacity. In our view, the VISUM model process has been over relied upon by KCC and has adversely affected their own decision making process. The detailed LinSig junction</p>	<p>Comments noted.</p>	<p>No change.</p>

	<p>capacity work carried out by DHAT in assessing the strategic residential developments off the A274 Sutton Road confirms that there are schemes open to the Council to mitigate the effects of development in south Maidstone and that the findings of the VISUM model cannot be wholly relied upon, particularly when it comes to assessing the viability and success of various different junction level measures.</p> <p>In concluding on this point, we are supportive of the Do Something 2 (DS2) scenario within the VISUM model analysis, as this approach is wholly compliant with overarching Government policy on sustainable transport. Furthermore, evidence shows that this DS2 strategy can be delivered economically and viably and will act to fully accommodate the economic and residential development proposed in Maidstone.</p> <p>However, given that the Council has opted to base its evidence in the DITS on the DS4 VISUM modelling scenarios, We object to Draft Local Plan Policy DM24 on the basis that better performing scenarios that better reflect national planning policy on sustainable transport have been overlooked and should be reviewed.</p>		
69. Integration with adjacent authority's strategy	Further integration with the equivalent strategy for Tunbridge Wells Borough Council is required (generally).	Comments noted.	Cite equivalent transport strategies in section 5 (Policy Context) and the proposals affecting

<p>70. The ITS contains no effective mitigation and is based on a package of transport measures that have not been agreed by the Local Highway Authority</p>	<p>The draft Integrated Transport Strategy is founded on a package of transport improvements that has not been agreed by the Local Highway Authority</p> <p>The supporting Integrated Transport Strategy (ITS) should enable the impacts of the planned growth to be understood and mitigated and provide a basis for identifying how any required improvements can be funded and delivered through new development. This approach is set out within the Planning Practice Guidance¹ as a means of ensuring that a Local Plan is underpinned by a robust evidence base.</p> <p>The draft ITS prepared by Maidstone Borough Council (MBC) does not achieve these fundamental requirements. Despite intensive VISUM traffic modelling work jointly commissioned by KCC and MBC, the draft strategy is founded on a package of transport improvements that has not been agreed by KCC - as Local Highway Authority - and, fundamentally, does not provide an acceptable means of mitigating the impact of the planned growth in housing and employment. This will result in severe impact on parts of the highway network, most notably on the A229 and A274 in south and south east Maidstone.</p> <p>The traffic modelling evidence to substantiate these concerns was presented to the Maidstone</p>	<p>The package of transport interventions within the draft ITS is substantially represented in VISUM model scenario DS4b. The results this scenario, testing the Objectively Assessed Need of 18,560 housing units, demonstrate that following mitigation through highway capacity, public transport and walking/cycling improvements, the residual cumulative traffic impact of the developments cannot be regarded as severe.</p> <p>This conclusion is further substantiated by the findings of localised junction modelling for the A274 corridor which has assessed the cumulative impacts of development in south east Maidstone.</p>	<p>Maidstone Borough.</p> <p>No change</p>
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	<p>Joint Transportation Board (JTB) which on 7 December 2015 resolved:</p> <p><i>“We agree in the absence of an agreed transport strategy and in light of the evidence presented to this Board demonstrating Maidstone’s significant highway capacity constraints, this Board recommends that a transport strategy be taken forward urgently by the Borough and County Councils covering the period of the Local Plan, with a further review completed in 2022. The aim of this strategy will be to mitigate the transport impact of future growth, in the first instance up to 2022. The strategy should comprise of the key 3 highway schemes and public transport improvements agreed by the Board, and further traffic modelling will be required to identify its impact. It is proposed that the £8.9 million growth fund monies identified for transport be used to accelerate the delivery of these improvements. Existing developer contributions may then be used to support further measures. The agreed transport strategy should also develop the justification for a relief road between the A20 to the A274 (the Leeds and Langley Relief Road), along with a preferred route, in order to allow testing with other strategic transport options and identify all source of potential funding to enable the schemes to be implemented at the earliest opportunity.”</i></p> <p>The published draft ITS does not reflect the JTB</p>		
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	<p>resolution in that it fails to include the opportunity to achieve a jointly agreed ITS covering the period to 2022. This could be founded on the 14,034 houses that MBC expects to be delivered within this period and the accelerated delivery of highway improvements.</p> <p>A report was submitted to the KCC Environment and Transport Cabinet Committee meeting held on 11 March 2016 recommending that an objection should be raised to the draft ITS on the grounds that the impact of the Local Plan on the highway network over the period to 2031 will be severe in the absence of effective mitigation.</p>		
General issues			
71. Disabled and ageing sections of the population	The strategy and its priorities don't take into account the need of the ageing and disabled sections of the population.	ITS Objective 5 stresses the need to ensure the transport network provides equal accessibility to all, including the elderly and disabled. Action PT5 identifies the need for improved accessibility to rail stations, including for the mobility impaired; however it is acknowledged that this could be made more explicit.	Review Action PT5.

72. Need for a further station on HS1 to serve Maidstone	<p>A new station should be built on HS1 on the A249 and should be served by 'Fastrack' bus services. The station should connect Maidstone, Ashford and Ebbsfleet and the main Nord/Pas de Calais centres.</p> <p>Maidstone only has a 'botched' limited connection to HS1 via the Medway Towns what is needed is a station the main HS1 line as it passes though the Borough to the north of Maidstone to provide an appropriate and proper connection.</p>	<p>This would be sited in the foreground of or within the Kent Downs AONB and thus have a significant environmental impact.</p> <p>Given the strategic nature of the route it is unlikely that a further station would be considered.</p>	No change
73. Fares should be reduced	High fares are a disincentive to travel	The need for good value flexible ticketing products is fully recognised, but the cost of travel by public transport needs to be fairly compared with that by private car, whose costs comprise more than the cost of fuel and parking. There is a need for better marketing of public transport options, as Action PT13 identifies.	No change
74. The horse-riding community	The strategy talks about vehicles, cycles and pedestrians but makes little or no mention of horse riders and equestrian needs. To ensure value for money new routes should be made as accessible to as many sections of the community as possible. Where ever improvements are provided for cyclists they should include equestrians too.	Comments noted.	Review ITS/Walking and Cycling Strategy actions to ensure that the interests of equestrians are explicitly considered.
75. Motor bike users	Then ITS makes no specific provision for motorbike users and could include measures like extra dedicated parking areas in the Town	Comments noted.	Review Actions P1 to P4 to consider the scope for dedicated PTW parking.

	Centre		
76. Traffic management/control systems	Traffic management systems should better regulated to ensure a smoother flow of traffic and less congestion. It currently seems as if they are not working effectively. Traffic lights could be turned-off or replaced by roundabouts	KCC has an Urban Traffic Management and Control system for Maidstone which optimises signal timings	No change
77. Maidstone should have a tram system	Other towns have discovered that modern trams can be very effective in both providing good transport systems and alleviating traffic congestion. It may seem a "Pie in the Sky" suggestion, but why not at least commission an investigation into the provision, perhaps utilising encouragement from Public Authorities and investment from Private companies	The total population of Maidstone and the density of development along the main road corridors will not generate a level of patronage sufficient to warrant the very high capital and operating costs of Light Rapid Transit during the Local Plan period. It could, however, be investigated in the longer term as a natural progression from bus priority corridors should these be delivered.	No change.
78. No further homes should be built until the measures set out in the ITS have been delivered	No more homes should be built until the council have improved the roads and invested in walk, cycle and bus alternatives. The inadequate parking space requirements set out by MBC for new build homes has caused our town to have a higher % of car owners than the national average. This must change.	Comments noted.	No change.
79. The priority should be to keep Maidstone moving	The priority should be to keep Maidstone moving. When Maidstone borough council charge 16 year old children £400 per year for a school bus pass they show that they encourage more car journeys. "Partners" cannot be expected to do the work the local council won't do.	Comments noted.	No change.

WALKING AND CYCLING STRATEGY

<p>1. Action SWM1 Close North Pole Road for cycle route</p>	<p>i) Approval in principle for the proposal, subject to various safeguards for residents of the road.</p>	<p>Action SWM1 is an indicative proposal only. The Council will work with KCC to review the representations made and balance the needs of vehicle access against the desire to create an attractive walking, cycling and equestrian route.</p>	<p>Amend supporting text for Action SWM1, following discussions with KCC to develop a proposal which is considered suitable to progress to feasibility design and public consultation, subject to funding being secured.</p>
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	<p>ii) Yes, the Proposal to Close North Pole Road to Through Traffic is an excellent suggestion. North Pole Road is extremely narrow and does not allow for cars to pass each other, when travelling towards each other, without one of the vehicles pulling off the tarmac and onto the mud / banks on one side or other. This manoeuvre is not always possible at the point where the cars are meeting each other, therefore often one vehicle must back up for 50 yards or whatever to find a convenient passing spot. Furthermore, as the speed limit is high (National Speed Limit) and the road has many twists and turns as well as frequent hills and dales (rather like a switchback) it is dangerous, with cars frequently finding that they are hurtling towards each other coming out of a bend....Without through traffic the road would be much safer for cyclists, horse riders, and groups of walkers, and runners, as well as bird-watchers; and additionally would provide a pleasant environment for passing through. The road does <u>not</u> provide a "short cut" in either direction, therefore does not serve a particular purpose when being used as a through road.</p>	<p>Action SWM1 is an indicative proposal only. The Council will work with KCC to review the representations made and balance the needs of vehicle access against the desire to create an attractive walking, cycling and equestrian route.</p>	<p>Amend supporting text for Action SWM1, following discussions with KCC to develop a proposal which is considered suitable to progress to feasibility design and public consultation, subject to funding being secured.</p>
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	<p>iii) There is a strong case for keeping North Pole Road / Barming Road open:</p> <ol style="list-style-type: none"> 1. The whole route from North Pole Road through to Barming Road into East Malling is regularly used as a cut-through, and not just by local residents. Vehicle numbers are set to increase as housing developments (and therefore traffic congestion) on Hermitage Lane increase. 2. Despite it being a narrow single track road with very few passing places, barely fit for purpose and totally unsuitable for HGVs, it provides an emergency route if the A26 is blocked between Barming and Wateringbury. This in turn eases the increasing volume and speed of traffic on Malling Road through Teston. Alternatively, any potential for a 'quiet lane' / shared space / 20mph limit being put in place would never work because it would never be self-enforcing and is already a danger to cyclists, walkers and horse riders. It is narrow, winding and undulating, which presents a mere challenge to hasty drivers, particularly at night when headlights give an indication of oncoming vehicles, and during the winter when the branches are bare and marginally improve sight lines. There are serious concerns about the speed of traffic running the complete length of the road – "accidents waiting to happen". The strongest case is for closing the middle "uninhibited" section of North Pole Road i.e. the section between Mingulay at the Barming end and Brambledown / Parkwood Cottages just before Teston Corner:- 3. It would secure the safety of a valuable local natural space for families, cyclists, walkers and horse 	<p>Action SWM1 is an indicative proposal only. The Council will work with KCC to review the representations made and balance the needs of vehicle access against the desire to create an attractive walking, cycling and equestrian route.</p>	<p>Amend supporting text for Action SWM1, following discussions with KCC to develop a proposal which is considered suitable to progress to feasibility design and public consultation, subject to funding being secured.</p>
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	<p>riders to enjoy and to benefit from, at a time when surrounding green and open spaces in Barming and North West Maidstone are being developed and traffic congestion is increasing to intolerable levels. For this reason alone, the proposal must be brought forward: the 5 year timescale is far too long to wait.</p> <p>4. It would still allow access to properties at either end of North Pole Road to be maintained.</p> <p>5. Careful consideration of exactly where bollards are placed is essential. Whilst closure will prevent years of fly tipping and litter dumping along North Pole Road, it will be continue to be dropped at the bollards and cause nuisance to nearby properties. Stoppage/no through road signage will need to be very clear and give ample warning, because of insufficient turning space at the bollards for vehicles to turn round and go back.</p>		
	<p>iv) A cycle way route linking Upper Fant Road Maidstone to Kings Hill. The proposed access to Kings Hill is through the parish of Wateringbury. The Parish Council is annoyed at not having been consulted on this plan. The proposal is to use Barming Road, Red Hill and Teston Road. At the point of turning right from Red Hill to Teston Road is a bend with fast moving traffic and a danger to cyclists is a major factor at this point. The closure of North Pole Road to through motor traffic will push vehicles currently using this route on to the A26 adding to the congestion and pollution in Wateringbury.</p> <p>Any traffic to homes on the Maidstone side of the</p>	<p>Action SWM1 is an indicative proposal only. The Council will work with KCC to review the representations made and balance the needs of vehicle access against the desire to create an attractive walking, cycling and equestrian route.</p>	<p>Amend supporting text for Action SWM1, following discussions with KCC to develop a proposal which is considered suitable to progress to feasibility design and public consultation, subject to funding being secured.</p>

	<p>vehicle barrier will have travel via Wateringbury The agricultural traffic of the woodsmen will be forced to divert through Wateringbury as the main works are on the Wateringbury side</p> <p>Wateringbury Parish Council has been assured that no access of any kind would be allowed from our parish to Kings Hill. Therefore the inclusion of a cycle way to Kings Hill would negate the validity of the plan. Wateringbury Parish Council strongly objects to the cycle plan as proposed.</p>		
	<p>v) Closure of North Pole Road (to the north of Teston parish) to create a cycle route from Barming to Kings Hill. This road is, in effect, a country lane for the majority of its route which might be suited to becoming a 'quiet lane' with drivers encouraged to be more respectful of non-vehicle users. However, our Parish Council could not support the stopping up of this highway which on occasions has provided a necessary alternative route for diverted traffic during closures and emergencies on the A26. Additionally the homeowners of our parish who live in that road would be massively inconvenienced by a closure which, in our view, is not necessary simply to create a cycle route for the small number of cyclists who might be inclined to use it.</p>	<p>Action SWM1 is an indicative proposal only. The Council will work with KCC to review the representations made and balance the needs of vehicle access against the desire to create an attractive walking, cycling and equestrian route.</p>	<p>Amend supporting text for Action SWM1, following discussions with KCC to develop a proposal which is considered suitable to progress to feasibility design and public consultation, subject to funding being secured.</p>
	<p>vi) This is a great idea. Concern for a period of time about the increasing volume and speed of traffic using the road. North Pole Road is not only used by cyclists but also by walkers and horse riders too who access Oaken Woods.</p>	<p>Action SWM1 is an indicative proposal only. The Council will work with KCC to review the representations made and</p>	<p>Amend supporting text for Action SWM1, following discussions with KCC to develop a proposal which is considered suitable to</p>

		balance the needs of vehicle access against the desire to create an attractive walking, cycling and equestrian route.	progress to feasibility design and public consultation, subject to funding being secured.
	vii) Barming Parish Council comment regarding the Integrated Transport Strategy (Walking and Cycling Strategy) that the majority of members would like to see North Pole Road left open to vehicles.	Action SWM1 is an indicative proposal only. The Council will work with KCC to review the representations made and balance the needs of vehicle access against the desire to create an attractive walking, cycling and equestrian route.	Amend supporting text for Action SWM1, following discussions with KCC to develop a proposal which is considered suitable to progress to feasibility design and public consultation, subject to funding being secured.
2. Proposed route RMB2	The cycle route is unable to be read on the mapping. It appears to wander along steep lanes which are often running in mud. The edges of these road are notoriously badly maintained so especially at night and in the wet, cyclists may be tempted to swerve with dire consequences. The route must join the A229 at some point so cyclists will be expected to combat large lorries passing along this narrow A road with fast cars at 60mph and more. The route onwards to Cranbrook is no better. This route is unrealistic	Action RMB2 was identified from suggestions made by the Maidstone Cycle Forum. It does join the A229 between Clapper Lane and Chart Hill Road, but this is a distance of just 600m and the scope to mitigate potential cyclist/vehicle conflicts on this section will be investigated.	No change.
3. Lack of safe cycling routes in Staplehurst	Staplehurst has very few designated cycle routes. Whilst increased parking is proposed for the shops area it is not safe to cycle there.	Action RMB15 outlines the need to undertake an audit of pedestrian/cycle accessibility to key destinations in	No change.

		Staplehurst, to identify potential interventions to address local concerns. These could include measures identified in the Neighbourhood Plan.	
4. PROW KM52 (Kirkdale Road to Kirkdale/Loose village) Action SEM2	Object to this stretch of cycle path scheme, as it does not demonstrate MBC's commitment to properly protecting Loose valley and village. Due to the damaging environmental and visual impact it will have. The protection of footpath KM52 should be an integral and crucially important part of this commitment. The cycle path scheme contravenes the stated objectives, policies and principles of the Local Plan and should be expunged from the Draft Integrated Transport Strategy	Action SEM2 is fully consistent with draft Local Plan Policy DM24 (Sustainable Transport). Walking and cycling improvements are an essential element of managing demand on the transport network, including on the A229 Loose Road. The environmental and visual impacts of the scheme will be mitigated to a level far outweighed by the benefits delivered.	No change.
5. RMB7 Barming to Yalding Towpath Cycle Route	Extension of the Medway Towpath Scheme from Barming to Yalding. We do not believe the Borough Council has given any consideration to the impact of an extension on agricultural landowners / cattle grazing. The River Medway winds through land that is used for these purposes and therefore the effect on farming is a serious issue. Our experience suggests that cyclists do not like gates / stiles and do not treat them reasonably yet they are necessary for the security of grazing animals. Creating cycling routes would increase public liability risks in these	Action RMB7 was identified from suggestions made by the Maidstone Cycle Forum. Para. A.77 stresses that all Strategy proposals are indicative only. Early engagement with landowners and other stakeholders would of course form part of the	No change.

	scenarios and hence an increased insurance cost to landowners. These are matters about which Maidstone Borough Council has failed to engage.	feasibility stage, subject to securing necessary funding.	
6. Cycle routed to Rural Service Centres and Transport Hubs	The emphasis on improved cycle routes to rural service centres and transport hubs such as Marden is welcomed (Objective 1A, Actions C1, C2, PT5, RMB3, RMB8 and RMB14).	Support noted.	No change.
7. Measures and proposals don't go far enough and more could be done	<p>Support all the measures and individual proposals in the detailed appendix and all the proposed routes, a large number of which we note were proposed by the forum. Believe that these would be enhanced with the addition of the following:</p> <p><u>NEW ADDITIONAL CYCLE ROUTES and LINKS</u></p> <p>These are proposed to link up existing well used routes by cyclists to give them more protection</p> <p>HIGH STREET</p> <ol style="list-style-type: none"> 1. County Road to Station Road 2. Link between River and Priory Road 3. Allow cycle access onto quiet roads from the River 4. Week Street to Staceys Street 5. Fairmeadow to High Street 6. King Street to Chancery Lane - Shared use path and crossings need upgrading, completely unsuitable for purpose 7. St Lukes Road to Wheeler Street 8. Alley between College Road and Brunswick Street 9. Make legal to cycle and provide suitable crossing into College Road 	<p>The measures and proposals in the Walking and Cycling Strategy with respect to the Maidstone urban area have been selected with the primary objective of "filling in the gaps" in the short term. This is considered essential in the context of funding which is likely to be limited. However, the additional schemes will be considered on their merits and incorporated within the Action Plan where appropriate, as longer term schemes if necessary.</p> <p>The benefits to cyclists of road closures and contraflows are recognised. However, their technical and political</p>	<p>Liaise with KCC to review suggestions and incorporate additional measures in the Walking and Cycling Action Plan as deemed appropriate.</p>

	<p>10. Union Street to Vinters Road - Remove need to dismount or cycle on main road by providing proper crossing here</p> <p>11. MTC8 High Level Railway Bridge – excellent proposal for shared use, eastern path would need widening. However this would create a very useful link between the two sides of town as well as linking Maidstone East and Maidstone Barracks stations.</p> <p>12. Out of Mote Park - Improve access, currently very difficult to use on bicycle with dangerous road crossing.</p> <p>HEATH and FANT</p> <ol style="list-style-type: none"> 1. St Andrews Road to Queens Road 2. Link between Bower Mount Road and St. Michaels Road 3. Removes need to cycle for short section on Tonbridge Road - Shared use pavement may work in the short term, but is not a long term solution <p>BRIDGE and FANT</p> <ol style="list-style-type: none"> 1. Cornwallis Road to Bedford Place 2. Make current footpath into dual use so as to link Oakwood Park Area to London Road, providing a safer route towards the town centre 3. Fant to Maidstone West Station 4. Badly needed to enable people to cycle from Fant into the town centre. Shared use would be a good short term measure, but is not a long term solution <p>ALLINGTON</p> <ol style="list-style-type: none"> 1. Headingley Road to Juniper Close 	<p>deliverability must be carefully considered. As the Strategy is a living strategy, there is the flexibility to bring forward these measures via the monitoring and review process as changing circumstances allow.</p>	
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	<ul style="list-style-type: none"> 2. Remove gate and allow cycling 3. Access from segregated path to Beaver Road 4. Poplar Grove, ensure that cycle lanes on both sides of the road become mandatory and also get double yellow lines, most of the time the lanes are blocked on both sides, forcing bikes out into the main carriageway. <p>NORTH</p> <ul style="list-style-type: none"> 1. Improve linkages out of Whatman Park across Medway to Ringlestone 2. Replace stairs with ramp to allow cycling, on bridges across Medway to Whatman Park 3. Saxons Drive - Cycle route currently has steps. These should be replaced with a ramp <p>SOUTH/ SHEPWAY NORTH</p> <ul style="list-style-type: none"> 1. Link between Cranbourne Avenue and Pheasant Lane <p>BARMING/ WEST FARLEIGH</p> <ul style="list-style-type: none"> 2. North Street/ South Street/ Barming Bridge/ St Helen's Lane/ Kettle Lane 3. This provides an excellent route from Barming and West Maidstone to the Countryside and the Weald, it should be adopted as a signed cycle route. <p>BEARSTED</p> <ul style="list-style-type: none"> 1. Path from Parish Church south to Ashford Road (A20), this is a wide footpath, with minor improvements it can be a good dual use route providing a good link towards Bearsted Green and the railway station from south east Bearsted. <p><u>ROAD CLOSURES</u></p> <p>There is a lot of evidence from Boroughs that have</p>		
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	<p>done it , that Road Closures can be used to help vastly improve routes for cyclists, as well as pedestrians and improve road safety generally. A number of strategic road closures in Maidstone could enhance cycling, but also help to work on areas for residential speed reductions. We have listed these in priority order and would, welcome a commitment to implement them all, but initially perhaps carry out up to 10 pilot road closures. Our proposals include:</p> <p>HEATH</p> <ul style="list-style-type: none"> • Oakwood Road - Remove rat run, make road safer for cycle and residents <p>BARMING</p> <ul style="list-style-type: none"> • We fully support the courageous proposal to make a road closure along North Pole Road - Making a closure to road traffic except pedestrians and cyclists would create an excellent safe route from Kings Hill/ Teston/ Malling to Barming and Maidstone, through road traffic can use the parallel A26 Tonbridge Road. This will link with the proposals for North/ South Streets as well as the Fant Farm Route described below. <p>BRIDGE</p> <ul style="list-style-type: none"> • Buckland Road -This would be one of the most important road closure. Through route removed for motor vehicles, cyclists only through closure. Would massively improve route 12. <p>WEST FARLEIGH</p> <ul style="list-style-type: none"> • Kettle Lane - Making a closure to road traffic except pedestrians and cyclists would create 		
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	<p>an excellent safe route from Barming to West Farleigh and the Weald, climbing a hill in safety, Through road traffic can use the parallel Charlton Lane and Gallants Lane</p> <p>HIGH STREET</p> <ul style="list-style-type: none"> • Wheeler Street • Closing Wheeler Street to through motor traffic would improving cycling conditions in the whole area by removing rat running. Could also be closed at the junction with the B2012, with traffic lights for cyclists as an alternative • Queen Anne Road - Closing this end to motor traffic would stop this being used as a rat run for through traffic, and create a cycle friendly street • Upper Road - Remove rat running • Lower Road- Remove rat running, Exemption for buses • Hastings Road - Remove through traffic to make road safer for children at Maidstone Grammar School, Exemption for buses <p>ALLINGTON</p> <ul style="list-style-type: none"> • Hyde Road - With exemption for buses • Hildenborough Crescent - To remove through traffic completely, Exception for buses. Consider closure at London Road or Castle Road • Ash Grove - To remove through traffic completely <p>LOOSE/ SOUTH</p> <ul style="list-style-type: none"> • Cripple Street/ Teasaucer Hill • A road closure just before Bockingford Lane 		
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will make this a much safer environment than currently. Cripple Street, Cave Hill links well to the Medway Route at Tovil Bridge, providing a linkage towards Boughton Monchelsea.

CYCLING ON PEDESTRIANISED STREETS

Across the borough there are a number of pedestrianised streets and bridges. If these were dedicated for dual use, which we note is the County Council's preference rather than segregated routes, then strategic routes would be opened up and significant improved use could be made of the Medway Towpath Cycle Route. These proposals include

RIVER MEDWAY CROSSINGS

1. Barming Bridge - This footbridge should be a permitted cycle route, promoting cycling to the Medway from both Yalding and West Farleigh and Barming areas.
2. Tovil Bridge - This footbridge should be a permitted cycle route, it forms part of a main route between Fant and Tovil
3. Allington Lock - Whilst the bridge over the weir is dual use, the path over the lock gates should clearly be signed as dual use

In the Town Centre we have two proposals

1. Week Street - HGVs are allowed here between 5:30pm and 10:30pm. Why can't two way cycling be allowed too, at the very least only during this times, and ideally at all times.
2. Earl Street - HGVs are allowed here between 5:30pm and 10:30pm. Why can't two way

cycling be allowed too, at the very least only during this times, and ideally at all time

CONTRA FLOW CYCLING

Short stretches of contraflow cycle lanes have demonstrated in Maidstone and elsewhere the ability to considerably improve cycling and cycling linkages. We would recommend the following are adopted:

HIGH STREET

- Bank Street - Cycling is already allowed Eastbound, why not Westbound as well?
- Church Street/Marsham Street - Roads would be wide enough to allow contraflow cycling
- Queen Anne Road

NORTH

- Perryfield Street
- Albert Street
- Peel Street

ALLINGTON and HEATH

- Buckland Lane - To provide access to Route 12 without the narrow shared use path
- Marigold Way

SHEPWAY NORTH and EAST

- Plains Avenue
- Vinters Road

MAIDSTONE TOWN CENTRE GYRATORY SYSTEM

We would recommend that once the new traffic system is implemented that on an pilot experimental basis the North lane (left) on the Bazalgete Bridge is conned off for cycling use only to help link the town centre to west Maidstone, this will not significantly impact on traffic as there will still be three lanes left

	<p>for a reduced amount of traffic.</p> <p>We would also recommend that the underpass to the bottom of the High Street and across the Broadway are left open as they contribute significantly to safe segregated pedestrian and cyclists access to the town centre from the west of Maidstone.</p> <p><u>OTHER MEASURES</u></p> <p>Priority traffic signals, we would like to see traffic signals with cyclist phasing and advance stopping lines incorporated at all major junctions across the borough.</p> <p>HIGH STREET –</p> <p>Replace signals with zebra Junction King Street/ Wyke Manor Road, giving pedestrians’ priority will reduce delays for pedestrians, and mean that cyclists do not have to stop for red lights during non-busy times.</p> <p>FANT/ HEATH –</p> <p>Fant Lane/ Tonbridge Road - Fant Lane Right Turn Exemption for cyclists - Exempt cycles from the right turn ban out of Fant Lane, to allow better access to Queen's Road</p> <p><u>NEW CYCLE TRACKS</u></p> <p>NORTH/ HIGH STREET/ FANT/ BARMING</p> <p>The Medway Towpath</p> <p>This excellent scheme is fully supported, although as a second stage we would like to see a segregated pedestrian and cycling facilities provided. There is easily sufficient space from Lockmeadow to Barming Bridge to provide a 3m two way cycle track and an adjacent footpath, there is scope in this stretch to make a high quality statement route.</p>		
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	<p>As part of the route dual access must be made for Barming, Tovil, Millennium Bridges and full cycling access to the Allington Lock area. This route will provide an important route linking Maidstone Town Centre to residential areas and will provide a safe and attractive alternative to the A26 Tonbridge Road which is a dangerous road for cycling along, especially from St Michaels Road/ Bower Mount Road to the town centre. It will also allow cyclists to avoid the gyratory system.</p> <p>ALLINGTON</p> <ul style="list-style-type: none"> Giddyhorn Lane - Upgrade surface and width to create cycle access from Maidstone Hospital and Allington to Route 12 <p>HEATH/ ALLINGTON</p> <ul style="list-style-type: none"> Hermitage Lane - Two way cycle track along Hermitage Lane, this should extend from Marigold Way all the way on the eastside as far as the A20 London Road in Aylesford, and will require co-operation with Tonbridge and Malling Council. <p>NORTH</p> <ul style="list-style-type: none"> Lock Lane Sandling - The road up from Allington Lock by Kent Life should be opened for cycling only, it is currently blocked off Forstal Road, Sandling - The cycle track on the dual use pavement should be extended from where it stops, over the M20 Road Bridge to Cobtree Manor <p>FANT</p> <ul style="list-style-type: none"> Unicomes Lane - This Private Road should be made up as a cycle track to line Fant to the 		
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	<p>Medway River Cycle Highway</p> <ul style="list-style-type: none"> Fant Farm – We fully support the proposals for the route here. The current Private Road/ Public Footpath from Upper Fant Road/ Hackney Road to Farleigh Lane should be made into a dual use path with a properly surfaced cycle track. This will provide a convenient access to East Farleigh station and also can link with the footpath from Rectory Lane to South Street. This would be an alternative higher up the valley to the Medway route which will be susceptible to periodic flooding, also providing improved access to attractive Countryside adjacent to Fant and Barming. <p>AYLESFORD London Road missing link - fix the missing link between two segregated cycle routes</p> <p><u>RURAL LINKAGES</u></p> <p>We support the concept of quiet lanes as are provided in East and West Malling, these serve to provide safe environments for cyclist and non-motorised transport. We want to work with the two Councils to provide a set of cycle routes in the rural areas to provide north-south and east-west routes away from “A” and “B” roads. The current proposal for a North-South route in Staplehurst Town to the west of the main A229 provides an excellent example.</p>		
<p>8. General comments on proposed measures</p>	<p>In paragraph A.36 it may be helpful to acknowledge that topography is also likely to be a constraint in some locations;</p> <ul style="list-style-type: none"> The targets quoted in A.42 will need to be 	<p>The VISUM model cannot directly model the impact of walking and cycling improvements, but</p>	<p>Amend text in paragraphs A.36 and A.68</p>

	<p>reconciled against the assumptions underpinning the VISUM traffic modelling;</p> <ul style="list-style-type: none"> • The text supporting Action C.11, in particular paragraph A.68, should reference the Kent Design Guide where detailed guidance is provided regarding designing streets for pedestrians and cyclists; • The traffic related implications of the road closure referenced in SWM1 (North Pole Road) would need to be understood and potentially mitigated before such a proposal could be deemed acceptable by KCC as Local Highway Authority; and • The timescales attributed to NEM1 and NEM2 are subject to restrictive clauses within the existing S106 Agreement. 	<p>scenario DS4b simulated these by reducing the number of forecast short car trips (i.e. less than 5km) within the urban area in the year 2031 by 6%. The actual number of trips will be confirmed, but the VISUM model will have included all trip purposes and not just travel to work which is the subject of the targets in A.42.</p> <p>The traffic related implications of Action SWM1 will depend on the details of the proposal, and the Council will work with KCC to identify a scheme which mitigates these.</p>	
9. Cycle Parking	There is no mention of the need for increased secure and convenient cycle parking to cater for all the expected new cyclists.	Comment noted.	Review Strategy references to cycle parking and clarify if necessary.
10. Cycle Lanes	Is provision of these practical where roads are narrow?	All Strategy proposals are indicative only at this stage. They would be designed in accordance with published highway	No change.

		design guidelines and would be subject to Road Safety Audit as part of this process.	
11. Safe pedestrian routes	You need to put safe crossings in for people first eg Old Tovil Rd close to Sheals Crescent major walk route, people have to cross on a blind bend. Sittingbourne Rd by queen Anne pub another blind crossing. If you can't even put decent crossings in for people it seems unlikely people will want to walk as it is so dangerous.	Upgraded crossing facilities by the Queen Anne public house are identified in Action MTC2. The justification for formalised crossing facilities to link Old Tovil Road across the A229 will be considered as part of Action W4.	No change.