

creating a better place



Tonbridge & Malling Borough Council
Gibson Building Gibson Drive
Kings Hill
West Malling
ME19 4LZ

Our ref: KT/2020/127835/01-L01
Your ref: TM/20/02749/OA
Date: 04 January 2021

Dear Sir/Madam

Outline application: Erection of up to 330 dwellings (including 40% affordable homes), together with associated open space, play areas, and landscaping (including details of access)

Land South of Barming Station and East of Hermitage Lane, Maidstone, Kent

Thank you for consulting us on the above proposal. With planning conditions imposed on any permission granted, as set out bellow, we have no objection to the Outline application.

This site overlies a principal aquifer and is partly within a source protection zone for water abstracted for human consumption. In addition, the depth to groundwater is relatively shallow, therefore controlled waters are sensitive in this area.

The reports submitted in support of this planning application provides us with confidence that it will be possible to suitably manage the risk posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken. It is our opinion that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the Local Planning Authority.

In light of the above, the proposed development will be acceptable if planning conditions are included requiring the submission of a remediation strategy, carried out by a competent person in line with paragraph 178 of the National Planning Policy Framework.

Without these conditions we would object to the proposal in line with paragraph 170 of the National Planning Policy Framework because it cannot be guaranteed that the development will cause or be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Environment Agency
Orchard House Endeavour Park, London Road, Addington, West Malling, Kent, ME19 5SH
Customer services line: 03708 506 506
Email: enquiries@environment-agency.gov.uk
www.gov.uk/environment-agency



Contamination

Condition

No development approved by this planning permission shall commence until a strategy to deal with the potential risks associated with any contamination of the site has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:
 - all previous uses;
 - potential contaminants associated with those uses;
 - a conceptual model of the site indicating sources, pathways and receptors;and
 - potentially unacceptable risks arising from contamination at the site.
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reason

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with paragraph 170 of the National Planning Policy Framework.

Note to LPA

A Phase 1 Land Quality Desk Study (Stantec, ref 330201412R1V3, October 2020) has been submitted in support of this application and we feel it has been carried out in accordance with relevant guidance.

- This document therefore satisfies part 1 of the above condition.

The Desk Study has recommended that further site investigation should be carried out (part 2 of above condition), which we are in agreement with. We now look forward to receiving and providing comment on this submitted site investigation

Condition

Prior to any part of the permitted development being occupied a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason

To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 170 of the National Planning Policy Framework.

Condition

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site in line with paragraph 170 of the National Planning Policy Framework.

Drainage**Condition**

No infiltration of surface water drainage into the ground is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 170 of the National Planning Policy Framework.

Informative - Drainage

Only clean uncontaminated water should drain to the surface water system. Roof drainage shall drain directly to the surface water system (entering after the pollution prevention measures). Appropriate pollution control methods (such as trapped gullies and interceptors) should be used for drainage from access roads and car parking areas to prevent hydrocarbons from entering the surface water system. There should be no discharge into land impacted by contamination or land previously identified as being contaminated. There should be no discharge to made ground. There must be no direct discharge to groundwater, a controlled water.

Note - Soakaways

The majority of this site is located on the Hythe Beds. The use of soakaways in the Hythe Beds are not recommended as they can promote instability of the geology via washout of the sandier horizons, leading to the opening and enlargement of fissures

Environment Agency

Orchard House Endeavour Park, London Road, Addington, West Malling, Kent, ME19 5SH

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and subsequent collapse.

Piling

Condition

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated by a piling risk assessment that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 170 of the National Planning Policy Framework.

Informative - Piling

Piling can result in risks to groundwater quality by mobilising contamination when boring through different bedrock layers and creating preferential pathways. Thus it should be demonstrated that any proposed piling will not result in contamination of groundwater. If piling is proposed, a Piling Risk Assessment must be submitted, written in accordance with our guidance document "Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention. National Groundwater & Contaminated Land Centre report NC/99/73".

Informative - Waste Materials

The CLAIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste or have ceased to be waste. Under the Code of Practice:

- excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution
- treated materials can be transferred between sites as part of a hub and cluster project formally agreed with the EA
- some naturally occurring clean material can be transferred directly between sites.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to:

- the Position statement on the Definition of Waste: Development Industry Code of Practice and;
- The [Environmental regulations](#) page on GOV.UK

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Informative - Invasive Non-Native Species

We note there are several invasive non-native species recorded as being on the development site. The Developer should refer to guidance and follow the rules to prevent their spread. The latest guidance can be found on .GOV.UK

- <https://www.gov.uk/guidance/invasive-non-native-alien-plant-species-rules-in-england-and-wales>

Please contact us should you wish to discuss the above.

Yours faithfully

Sophie Page

Mrs Sophie Page
Planning Specialist

Direct dial 020 8474 8030

Direct e-mail kslplanning@environment-agency.gov.uk



Kent and Medway
Clinical Commissioning Group

Date: 25 January 2021

Primary Care Team

4th Floor Maidstone House
King Street
Maidstone
Kent
ME15 6JQ

Matthew Broome
Tonbridge and Malling Borough Council
Gibson Building
Gibson Drive
Kings Hill
ME19 4LZ

Email: kmccg.wkccg.primarycare@nhs.net
www.kentandmedwayccg.nhs.uk

Our Ref: 20/02749

Dear Matthew,

Letter reference: Land South of Barming Station and East of Hermitage Lane, Aylesford, Kent

NHS Kent and Medway Group (CCG) has delegated co-commissioning responsibility for general practice services in West Kent and is the body that reviews planning applications to assess the direct impact on general practice.

I refer to the above outline planning application which concerns the proposed residential development comprising up to 325 new dwellings.

The CCG has assessed the implications of this proposal on delivery of general practice services and is of the opinion that it will have a direct impact which will require mitigation through the payment of an appropriate financial contribution.

In line with the Planning Act 2008 and the Community Infrastructure Levy Regulations 2010 (the CIL Regulations) (Regulation 122) requests for development contributions must comply with the three specific legal tests:

1. Necessary
2. Related to the development
3. Reasonably related in scale and kind

We have applied these tests in relation to this planning application and can confirm the following specific requirements. The calculations supporting this requirement are set out in Appendix 1.

	Total Chargeable units	Total	Project
General Practice	325	£280,800	Towards refurbishment, reconfiguration and/or extension of Blackthorn Medical Centre, Bower Mount Medical Practice, The Vine

Letter reference: Land South of Barming Station and East of Hermitage Lane, Aylesford, Kent

			Medical Centre and/or The Medical Centre Group (Northumberland Court)
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The obligation should also include the provision for the re-imburement of any legal costs incurred in completing the agreement.

Justification for infrastructure development contributions request

This proposal will generate approximately 780 new patient registrations when using an average occupancy of 2.4 people per dwelling. The proposed development falls within the current practice boundaries of:

- Blackthorn Medical Centre
- Bower Mount Medical Practice
- The Vine Medical Centre
- The Medical Centre Group (Northumberland Court)

There is currently limited capacity within existing general practice premises to accommodate growth in this area. The need from this development, along with other new developments, will therefore need to be met through the creation of additional capacity in general practice premises. Whilst it is not possible at this time to set out a specific premises project for this contribution we can confirm that based on the current practice boundaries we would expect the contribution to be utilised as set out above. Any premises plans will include the pooling of S106 contributions where appropriate.

General practice premises plans are kept under regular review as part of the GP Estates Strategy and priorities are subject to change as the CCG must ensure appropriate general medical service capacity is available as part of our commissioning responsibilities.

Planning for growth in general practice is complex; physical infrastructure is one element but alongside this workforce is a critical consideration both in terms of new workforce requirements and retirements. Any plans developed need to support delivery of sustainable services for the future.

In addition to the above we request that any agreement regarding a financial contribution:

- Allows the contribution to be used towards new general practice premises in the area serving this population (should GP Estates Strategy identify future requirement) and not just limited to the practices detailed above.
- Allows the contribution to be used towards professional fees associated with feasibility or development work for existing or new premises.
- Supports the proactive development of premises capacity with the trigger of any healthcare contribution being available linked to commencement or at an early stage of development.

The CCG is of the view that the above complies with the CIL regulations and is necessary in order to mitigate the impacts of the proposal on the provision of general practice services.

Letter reference: Land South of Barming Station and East of Hermitage Lane, Aylesford, Kent

Please note that for any s106 contributions secured by the CCG, the legal agreement should detail NHS England and Improvement (NHSE/I) as the recipient of the funding.

I would be grateful if you could advise me of the Council's decision in due course, should you require any further information, or points of clarification in the meantime please contact me using the above email address.

Yours sincerely

Sent via email

Alison Burchell
Deputy Director of Primary Care - Strategic Planning and Primary Care Estates

Appendix 1

The CCG uses a formula for calculating s106 contributions which has been used for some time and is calculated as fair and reasonable. This calculation is based the number of proposed units multiplied by the assumed occupancy multiplied by £360.

Where the application identifies unit sizes the following predicted occupancy rates will be used.

- 1 bed unit @ 1.4 persons
- 2 bed unit @ 2 persons
- 3 bed unit @ 2.8 persons
- 4 bed unit @ 3.5 persons
- 5 bed unit @ 4.8 persons

Where the unit sizes are not identified then an average occupancy of 2.4 persons will be used.

The calculations for this development are:

The application does not detail unit sizes; the calculation below should be updated (based on the above unit sizes and predicted occupancy) once the dwelling mix is confirmed at a later date.

325 units X 2.4 average occupancy = 780 people

780 people X £360 = £280,800



Tonbridge & Malling Borough Council
Development Control
Gibson Building
Gibson Drive
Kings Hill
WEST MALLING
Kent
ME19 4LZ

FAO: Matthew Broome

Economic Development

Invicta House
County Hall
Maidstone
ME14 1XX

Phone: 03000 414176
Ask for: Richard Kidd
Email: richard.kidd@kent.gov.uk

Wednesday 20th January 2021

Your Ref: TM/20/02749/OA
Our Ref: K/E/TM/20/02749/OA RJK

Dear Matthew,

Provision and Delivery of County Council Community Services:

We refer to the above planning application and subsequent conversations upon the proposed residential development at **Land South of Barming Station and East of Hermitage Lane, Aylesford, Kent** and comprising **up to 330 new households**.

The County Council has assessed the implications of this proposal in terms of the delivery of its community services and is of the opinion that it will have an additional impact on the delivery of its services, which will require mitigation either through the direct provision of infrastructure or the payment of an appropriate financial contribution.

The Planning Act 2008 and the Community Infrastructure Levy Regulations 2010 (the CIL Regulations) (Regulation 122) require that requests for development contributions of various kinds must comply with three specific legal tests:

1. Necessary,
2. Related to the development, and
3. Reasonably related in scale and kind

These tests have been duly applied in the context of this planning application and give rise to the following specific requirements (the evidence supporting these requirements is set out in the attached Appendices).

Request Summary

	Per 'applicable' House	Per applicable Flat	Project
Primary Education	£6,800.00	£1,700.00	Towards the new Aylesford Primary School
Primary Land	£3,208.18	£802.05	Towards land acquisition for the new Aylesford Primary School
Secondary Education	£5,176.00	£1,294.00	Towards the new Broadwater Farm Secondary School
Secondary Land	£4,173.24	£1,043.31	Towards the land costs of the Broadwater Farm Secondary School

'Applicable' excludes 1 bed units of less than 56 sqm GIA and sheltered accommodation

	Per applicable Dwelling	Project
Community Learning	£16.42	Towards additional equipment for new learners at Aylesford Adult Education Centre, Teapot Lane
Youth Service	£65.50	Towards additional resources for the Youth Service in Tonbridge and Malling
Library Bookstock	£55.45	Towards additional services and bookstock for the new borrowers at Larkfield Library
Social Care	£146.88	Towards Specialist care accommodation within the Tonbridge and Malling Borough
	All Homes built as Wheelchair Accessible & Adaptable Dwellings in accordance with Building Regs Part M 4 (2)	
Waste	£183.67	Towards new WTS and new and improved HWRCs to serve Tonbridge and Malling residents
Broadband:	<p>Condition: Before development commences details shall be submitted for the installation of fixed telecommunication infrastructure and High-Speed Fibre Optic (minimal internal speed of 1000mb) connections to multi point destinations and all buildings including residential, commercial and community. The infrastructure installed in accordance with the approved details during the construction of the development, capable of connection to commercial broadband providers and maintained in accordance with approved details.</p> <p>Reason: To provide high quality digital infrastructure in new developments as required by paragraph 112 NPPF.</p>	
Highways	<i>Kent Highway Services will respond separately</i>	

Please note that these figures:

- are to be **index linked by the BCIS General Building Cost Index from April 2020 to the date of payment (April 2020 index = 360.3)**
- are valid for 3 months from the date of this letter after which they may need to be recalculated due to changes in district council housing trajectories, on-going planning applications, changes in capacities and forecast rolls, projects and build costs.

Justification for infrastructure provision/development contributions requested

The County Council has modelled the impact of this proposal on the provision of its existing services and the outcomes of this process are set out in Appendices below.

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Primary Education

The proposal gives rise to 91 additional primary school pupils during occupation of the development. This need, cumulatively with other new developments in the vicinity, can only be met through the provision of a new Primary School in Aylesford.

The additional Primary School pupils arising from the proposal could only be accommodated through the construction of a new primary school; there are no existing local schools which can be expanded to mitigate the direct demand generated.

Permission has recently been granted for the new Aylesford 2FE Primary School under TM/17/01595, and site secured by s106 Agreement, often referred to as Whitepost Field.

Whitepost Field are to hand over the entire school site including: services (gas, water, electricity, drainage, broadband), build the road access, supply fencing, undertake earthworks (levelling) and remediation as well any Archaeology and protected species removal, and cover all parties land transfer costs.

Whitepost Field housing proposal generates more than 1FE of pupils. Schools are built in full FE's and KCC Education have no other capacity to accommodate those pupils in excess of 1 FE elsewhere. Hence a full 2 FE school and site are required.

In the s106 for Whitepost field, KCC are to receive the 2FE School site for £1. KCC are then to transfer to the Owner, Primary School land contributions from Contributing sites, at rates of £3,208.18 per applicable house and £802.05 per applicable flat as set out in the Whitepost Field s106 agreement.

The school land calculation apportions the cost of the land on a per pupil basis.

This proposal (TM/20/01218) has been assessed in accordance with the KCC methodology of '*first come, first served*' assessment; having regard to the indigenous pupils, overlain by the pupil generation impact of this and other new residential developments in the locality.

The County Council requires a financial contribution towards the build costs of a **new Primary School in Aylesford** at **£6,800.00 for each 'applicable' house** and **£1,700.00 per applicable flat** ('applicable' means: all dwellings, except 1 bed of less than 56sqm GIA and any sheltered accommodation).

The County Council also requires proportionate contributions towards the new **Primary School land at £3,208.18 per applicable house and £802.05 per applicable flat** (Appendix 1A), as agreed in the s106 Agreement with the Owner of Whitepost Field site from other contributing sites.

Please note the Local Education Authority has a statutory obligation under the Education Acts and as the Strategic Commissioner of Education provision in the County under the Education Act 2011, to ensure sufficiency of pupil spaces.

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Secondary School Provision

The impact of this proposal on the delivery of the County Council's services is assessed in Appendix 1

A contribution is sought based upon the additional need required, where the forecast secondary pupil product from new developments in the locality results in the maximum capacity of local secondary schools being exceeded.

The proposal is projected to give rise to 65 additional secondary school pupils from the date of occupation of this development. This need can only be met through the provision of a **new Secondary School at Broadwater Farm**, north of Kings Hill within LP30 of the submitted Local Plan.

Please note where a contributing development is to be completed in phases, payment may be triggered through occupation of various stages of the development comprising an initial payment and subsequent payments through to completion of the scheme.

The assessment of Secondary schools identifies there are no surplus places at existing secondary schools with spaces already spoken for through current and forecast rolls and previously assessed developments in the area. It has been identified through the Local Plan process a new Secondary School is required to ensure sufficiency of places in accordance with the LEA's statutory responsibility.

The new secondary school accommodation will be provided through a new Secondary School at Broadwater Farm and delivered in accordance with the Local Planning Authority's Infrastructure Delivery Plan (where available), timetable and phasing.

The County Council requires a financial contribution towards construction of the **new Broadwater Farm Secondary school at £5,176.00 for each 'applicable' house and £1,294.00 per applicable flat** ('applicable' means: all dwellings except 1 bed of less than 56sqm GIA and any sheltered accommodation – please confirm if any 1 bed or sheltered accommodation is proposed).

Whilst KCC will be using every endeavour to secure the new Broadwater Farm Secondary School site as an 'allocation' in the Local Plan at no cost to the County Council, KCC will require an undertaking for proportionate contributions up to a maximum of **£4,173.24 per applicable house and £1,043.31 per applicable flat** from this site towards any land acquisition costs for the Broadwater Farm Secondary School.

The site acquisition cost is based upon local land prices, and any s106 agreement would include a mechanism to include a refund where all or any of the Secondary Education contribution is not required due to a lower land acquisition price being agreed or alternative Secondary provision arrangements being made.

Please note this process will be kept under review and may be subject to change as the Local Education Authority will need to ensure provision of the additional pupil spaces within the appropriate time and at an appropriate location.

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Community Learning

There is an assessed shortfall in provision for this service: the current adult participation in both District Centres and Outreach facilities is in excess of current service capacity, as shown in Appendix 2, along with cost of mitigation.

To accommodate the increased demand on KCC Adult Education service, the County Council requests **£16.42 per dwelling** towards the cost of providing additional equipment for new learners at Aylesford Adult Education Centre, Teapot Lane.

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Libraries

KCC are the statutory library authority. The library authority's statutory duty in the Public Libraries and Museums Act 1964 is to provide 'a comprehensive and efficient service'. The Local Government Act 1972 also requires KCC to take proper care of its libraries and archives.

Borrower numbers are in excess of capacity, and bookstock in Tonbridge and Malling Borough at 1,110 items per 1,000 population is below the County average of 1,134 and both the England and total UK figures of 1,399 and 1,492 respectively.

To mitigate the impact of this development, the County Council will need to provide additional services and stock to meet the additional demand which will be generated by the people residing in these dwellings.

The County Council therefore requests **£55.45 per household** to address the direct impact of this development, and the additional services and stock will be made available at Larkfield Library, as and when the monies are received.

Youth Service

To accommodate the increased demand on KCC services the County Council requests **£65.50 per dwelling** towards additional resources for the Kent Youth Service locally in Tonbridge and Malling.

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Social Care

The proposed development will result in additional demand upon Social Care (SC) (older people, and also adults with Learning or Physical Disabilities) services, however all available

care capacity is fully allocated already, and there is no spare capacity to meet additional demand arising from this and other new developments which SC are under a statutory obligation to meet. In addition, the Social Care budgets are fully allocated, therefore no spare funding is available to address additional capital costs for social care clients generated from new developments.

To mitigate the impact of this development, KCC Social Care requires:

- a proportionate monetary contribution of **£146.88 per household** (as set out in Appendix 3) towards specialist care accommodation locally in the Borough.
- The **Ministry of Housing, Communities and Local Government** identified in June 2019 guidance *Housing for older and disabled people* the need to provide housing for older & disabled people is critical. **Accessible and adaptable housing** enables people to live more independently and safely. Accessible and adaptable housing provides safe and convenient homes with suitable circulation space and suitable bathroom and kitchens. Kent Social Care request these dwellings are built to **Building Reg Part M4(2) standard** to ensure they remain accessible throughout the lifetime of the occupants to meet any changes in the occupant's requirements.

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Waste

Kent County Council is a statutory 'Waste Disposal Authority', responsible for the safe disposal of all household waste arising in Kent, providing Household Waste Recycling Centres (HWRC), Material Recovery Facility (MRF) and Waste Transfer Stations (WTS). Each household produces an average of a quarter of a tonne of waste per year to be processed at HWRC's and half a tonne per year to be processed at WTS's. Existing HWRC's and WTS's will be over capacity by 2020 and additional housing has a significant impact on the manageability of waste in Kent.

A proportionate contribution of **£183.67 per household** is required towards a new Waste Transfer Station and new and improved HWRC's to serve Tonbridge and Malling residents to mitigate the impact from new housing growth, including this development.

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Broadband: Fibre to the premise/gigabit capable

The NPPF (para 112) and The Department for Digital, Culture, Media and Sport requires full fibre connection to new developments being gigabit capable fibre optic to the premise connection for all.

Please include a Planning Condition to provide 'fibre to the premise' (FTTP) broadband connections to all premises of gigabit capacity.

Developers are advised to make early contact with broadband providers, as there can be a lead in time for cable installation and associated infrastructure.

Implementation

The County Council is of the view that the above contributions comply with the provisions of CIL Regulation 122 and are necessary to mitigate the impacts of the proposal on the provision of those services for which the County Council has a statutory responsibility. Accordingly, it is requested that the Local Planning Authority seek a section 106 obligation with the developer/interested parties prior to the grant of planning permission. The obligation should also include provision for the reimbursement of the County Council's legal costs, surveyors' fees and expenses incurred in completing the Agreement, and County monitoring fee of £500 for each trigger within the Agreement.

Would you please confirm when this application will be considered and provide us with a draft copy of the Committee report prior to it being made publicly available? If you do not consider the contributions requested to be fair, reasonable and compliant with CIL Regulation 122, it is requested that you notify us immediately and allow us at least 10 working days to provide such additional supplementary information as may be necessary to assist your decision making process in advance of the Committee report being prepared and the application being determined.

We look forward to hearing from you with details of progress on this matter.

Yours faithfully

Richard Kidd

Richard Kidd

Development Contributions
Kent County Council

Cc Croudace Homes, c/o Icen Projects, Da Vinci House 44 Saffron Hill London EC1N 8FH,
FAO: Rebecca Anderson
KCC, Education & Communities,
File

Appendices:

The following Appendices contain the technical details of the County Council's assessment process.

1. Education Assessment
 - 1a. New School Land Costs
2. Communities assessment
3. Social Care requirement

KCC developer contribution assessment for Primary Education

District:	Tonbridge and Malling	1-bed:	0
Site:	Land South Of Barming Station And East Of Hermitage Lane Aylesford Kent	Houses:	325
Plan ref:	TM/20/02749	Flats:	0
Date:	14/01/2021	Total units:	325

Current and forecast pupils on roll for schools within

East Malling planning group

DfE no.	School	2019-20 (A)	2020-21 (A)	2021-22 (F)	2022-23 (F)	2023-24 (F)	2024-25 (F)
2514	Brookfield Infant School	180	177	176	178	177	174
5223	Brookfield Junior School	250	248	268	272	273	273
5208	Ditton CE Junior School	222	212	214	209	218	214
5212	Ditton Infant School	159	160	162	167	165	163
3324	Leybourne St. Peter and St. Paul CE Primary Academy	214	212	217	218	216	215
2562	Lunsford Primary School	208	205	212	216	215	216
2006	St. James the Great Academy	186	186	192	193	196	193
3057	St. Peter's CE Primary School	173	179	176	176	175	174
2030	Valley Invicta Primary School at Aylesford	336	339	367	374	372	366
Current and forecast pupils on roll (excluding the expected pupil product from new developments)		1,928	1,918	1,983	2,002	2,007	1,988
Required capacity to maintain 5% surplus capacity		2,029	2,019	2,087	2,108	2,112	2,093

Current and forecast capacity for schools within

East Malling planning group

DfE no.	School	2019-20 (A)	2020-21 (A)	2021-22 (F)	2022-23 (F)	2023-24 (F)	2024-25 (F)
2514	Brookfield Infant School	180	180	180	180	180	180
5223	Brookfield Junior School	248	256	256	256	256	256
5208	Ditton CE Junior School	256	256	256	256	256	256
5212	Ditton Infant School	180	180	180	180	180	180
3324	Leybourne St. Peter and St. Paul CE Primary Academy	210	210	210	210	210	210
2562	Lunsford Primary School	210	210	210	210	210	210
2006	St. James the Great Academy	210	210	210	210	210	210
3057	St. Peter's CE Primary School	168	168	168	168	168	168
2030	Valley Invicta Primary School at Aylesford	330	330	315	300	270	240
Current and forecast capacity (1)		1,992	2,000	1,985	1,970	1,940	1,910

(1) including expansion projects at **existing schools** that have successfully passed through statutory processes but may not yet be complete

Expected pupil product from new developments within

East Malling planning group

Planning reference	Development	Houses	Flats	Primary product
TM/20/02671	Land Opposite 132 Broadwater Road West Malling Kent	1	0	0
TM/20/02577	Springate Farm Broadwater Road West Malling Kent ME19 6HU	1	0	0
TM/20/01836	Springate Farm, Broadwater Road, West Malling, Kent ME19 6HU	1	0	0
TM/20/01738	Development Site Land West Of Winterfield Lane East Malling West Malling	250	0	70
TM/20/01392	Former Somerfield Distribution Centre Station Road Aylesford Kent ME20 7QR	8	0	2
TM/20/01371	Stables Broadwater Road West Malling Kent	2	0	1
TM/20/01218	Land Adjacent Ditton Common North Of Rede Wood Road Oakapple Lane Barming Kent	118	0	33
TM/20/00135	Development Site At Pinewood Depot Winterfield Lane East Malling	12	0	3
TM/19/00376	Land South West of London Road and west of Castor Park, Allington Maidstone Kent	68	14	20
TM/18/03048	Garden Centre Rear Of 400 Hermitage Lane Maidstone Kent ME16 9NT (S106)	9	0	0
TM/18/03008	Site East Of Clare Park Estate New Road East Malling West Malling Kent (S106)	110	0	0
TM/18/02966	Development Site South Of Brampton Field Between Bradbourne Lane And Kiln Barn Road Ditton Aylesford	270	6	76
TM/18/00995	94 Mill Hall Aylesford Kent ME20 7JN	0	13	1
TM/17/03513	Land West of Hermitage Lane and East Units 4a,4b & 4c Mills Road Quarrywood Industrial Est Aylesford	33	12	10
TM/17/03350	Former Distribution Centre, Station Road, Aylesford (S106)	56	20	0
TM/17/01595	Land South of London Road and East of Hermitage Lane, Aylesford (S106)	840	0	0
TM/17/00964	Phoenix House, Forstal Road, Aylesford (S106)	12	0	0
TM/16/03657	Land North of Junction New Hythe Lane & Sheldon Way Larkfield The Old Print Works (S106)	4	8	0
New developments within the planning area		1,795	73	217
This development		325	0	91

Assessment summary

Detail	2019-20 (A)	2020-21 (A)	2021-22 (F)	2022-23 (F)	2023-24 (F)	2024-25 (F)
Surplus / (deficit) capacity (excluding the expected pupil product from new developments)	-37	-19	-102	-138	-172	-183
Expected pupil product from new developments	217	217	217	217	217	217
Surplus / (deficit) capacity including the expected pupil product from new developments	-255	-236	-319	-355	-389	-400
Expected pupil product from this development	91	91	91	91	91	91
Surplus / (deficit) capacity including the expected pupil product from new developments and this development	-346	-327	-410	-446	-480	-491
Expected pupil product from this development that on current plans for school provision cannot be accommodated	91	91	91	91	91	91

Background notes:

Pupil forecasts 2020 employed from September 2020. Incorporating roll data from Schools Census Autumn 2020. Data from the Health Authority includes pre-school children born up to 31st August 2019. Forecasts use trend data over the previous three years.

Expected pupil product from new developments within the planning area

Where a section 106 agreement has been secured for a development that includes education contributions (indicated by code S106 in brackets), the expected pupil product from that development has been shown as zero. This indicates that the pupil product need arising from the development has been mitigated by the developer.

Appendix 1A

Education

Site Name	Land South Of Barming Station And East Of Hermitage Lane, Aylesford, Kent
Reference No.	TM/20/02749/OA
District	Tonbridge and Malling

	Houses	Flats	Total
Unit Numbers	330	0	330

Primary Education			
		Per house	Per flat
<i>Primary pupil generation rate</i>		0.28	0.07
New Primary Pupils generated from this development			92
New Primary School build contribution			
	per Pupil	per House	per Flat
<i>New Build Rate</i>	£24,286	£6,800	£1,700
Contribution requested towards New Primary School Build			£2,244,000.00
New Primary School site contribution			
Residential Land Price per acre for Tonbridge and Malling			£950,000
	Pupils	Hectares	Acres
<i>2FE Primary School</i>	420	2.05	5.06555
	per Pupil	per House	per Flat
<i>Land Rate</i>	£11,457.79	£3,208.18	£802.05
Total = Primary School Site area x Residential Land Value x (Number of pupils generated by development/Number of pupils in New Primary School) = 5.06555 x 950000 x (92.4 / 420)			
Contribution requested towards New Primary School Site			£1,058,699.95
Total Primary Education Build and Land contribution			£3,302,699.95

Secondary Education			
		Per house	Per flat
<i>Secondary pupil generation rate</i>		0.20	0.05
New Secondary Pupils generated from this development			66
New Secondary School build contribution			
	per Pupil	per House	per Flat
<i>New Build Rate</i>	£25,880	£5,176	£1,294
Contribution requested towards New Secondary School Build			£1,708,080.00
New Secondary School site contribution			
Residential Land Price per acre for Tonbridge and Malling			£950,000
	Pupils	Hectares	Acres
<i>6FE Secondary School</i>	900	8.00	19.768
	per Pupil	per House	per Flat
<i>Land Rate</i>	£20,866.22	£4,173.24	£1,043.31
Total = Secondary School Site area x Residential Land Value x (Number of pupils generated by development/Number of pupils in New Secondary School) = 19.768 x 950000 x (66 / 900)			
Contribution requested towards New Secondary School Site			£1,377,170.67
Total Secondary Education Build and Land contribution			£3,085,250.67

Notes

Costs above will vary dependant upon land price at the date of transfer of the school site to KCC

Totals above will vary if development mix changes and land prices change

APPENDIX 2

KCC Communities

Development Contributions Assessment

Site Name	Land South Of Barming Station And East Of Hermitage Lane, Aylesford, Kent
Reference No.	TM/20/02749/OA
District	Tonbridge and Malling
Assessment Date	07/01/2021
Development Size	330

COMMUNITY LEARNING & SKILLS	
	Services
Current adult participation in Tonbridge and Malling district	1,893
LESS Current Service Capacity	1,803
Initial capacity shortfall/surplus (Year ending 2017)	-90
New adult participation from this development	11.84 clients
Will service capacity be exceeded?	YES
Contributions requested from this development	<u>£16.42 per dwelling</u>
<i>330 dwellings from this proposal</i>	<u>£5,418.60</u>
<i>Contributions requested towards additional equipment for new learners at Tonbridge Adult Education Centre</i>	

YOUTH SERVICE		
	Centre and Hub based Services	Outreach and Targeted Services
Current youth participation in Tonbridge and Malling district	1,853	998
LESS Current Service Capacity	1,764	950
Initial capacity shortfall/surplus (Year ending 2017)	-88	-48
New youth participation from this development	16.5 clients	
Will service capacity be exceeded?	YES	
Contributions requested from this development	<u>£65.50 per dwelling</u>	
<i>330 dwellings from this proposal</i>	<u>£21,615.00</u>	
<i>Contributions requested towards additional resources for the Youth Service in Tonbridge and Malling</i>		

LIBRARIES	
Libraries assessed for this development	Library Stock and Services
Current library participation in Tonbridge and Malling district	15,661
LESS Current Service Capacity	14,916
Initial capacity shortfall/surplus (Year ending 2017)	-746
New borrowers from this development	96.23 borrowers
Will service capacity be exceeded?	YES
Contributions requested from this development	<u>£55.45 per dwelling</u>
<i>330 dwellings from this proposal</i>	<u>£18,298.50</u>
<i>Contributions requested towards additional services and bookstock for the new borrowers at Larkfield Library</i>	

Net contributions requested for KCC Communities' Services	£45,332.10
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APPENDIX 3				
	Social Care			
	Land South Of Barming Station And East Of Hermitage Lane Aylesford Kent			
	TM/20/02749/OA			
	330 Households			
	<u>Requirement</u>	<u>Location</u>	<u>Cost per Household</u>	<u>Cost for this Site</u>
	Specialist Care Accommodation	within the Borough	£146.88	
			£ 146.88	£ 48,470.40
and	All Homes built as	Wheelchair Accessible & Adaptable Dwellings	in accordance with Building Regs Part M 4 (2)	



ECOLOGICAL ADVICE SERVICE

TO: *Matthew Broome*

FROM: *Helen Forster*

DATE: *03 May 2021*

SUBJECT: *20/02749/OAEA Land South Of Barming Station And East Of Hermitage Lane Aylesford*

The following is provided by Kent County Council's Ecological Advice Service (EAS) for Local Planning Authorities. It is independent, professional advice and is not a comment/position on the application from the County Council. It is intended to advise the relevant planning officer(s) on the potential ecological impacts of the planning application; and whether sufficient and appropriate ecological information has been provided to assist in its determination. Any additional information, queries or comments on this advice that the applicant or other interested parties may have must be directed in every instance to the Planning Officer, who will seek input from the EAS where appropriate and necessary.

The following surveys were carried out within the site:

- Phase 1 survey
- Bat
- Dormouse
- Badger
- Breeding birds
- GCN
- Reptile survey

As a result of carrying out a desk based assessment of the site we would not be anticipating other specific species surveys to be submitted as part of the application.

The surveys have detailed the following species were recorded/likely to be present within the site

- At least 8 species of bat foraging/commuting
- At least 30 species of birds including those which are notable/conservation importance)
- Common lizard and slow worm

- Suitable potential for hedgehogs

The survey concluded the following species were likely absent (although suitable habitat present)

- Dormouse
- Badger
- Harvest mouse
- Great Crested newts

Of the habitats on site it is possible that hedgerows (if classed as important under the hedgerow regs) could be considered a priority habitat but none of the other habitats are. However we acknowledge that the proposed development is proposing to retain, with opportunities to enhance, the majority of the hedgerows (except for access) and no further information is required on this point. Orchard is only considered a priority habitat if it is a traditional orchard and this is an intensively managed orchard.

Mitigation.

The proposal is intending to mitigate impacts on site and therefore we advise that the proposal will result in a loss of breeding bird habitat and the habitats and species retained on site are likely to be impacted by recreational pressure from the residents and an increase in lighting.

A detailed mitigation or management plan has not been submitted as part of this application and instead an overview of the mitigation proposed has been provided and we advise that, with the exception of the reptile mitigation, we are reasonably satisfied it is achievable if the onsite habitats are managed appropriately.

We note that the reptile mitigation has been proposed to use precautionary mitigation to move the reptiles in to adjacent habitat however there is limited open space proposed for the western boundary and therefore we advise that it is unlikely that this area can retain the reptile population and there will be a need for a reptile translocation. However we do not require further information on this point prior to determination as we're satisfied within the red and blue line boundary there is sufficient space to support the population.

The submitted information details that the intention is to manage the retained area of orchard as a traditional orchard and its likely that if managed properly this could benefit biodiversity in the long term.

As referred to above the ongoing management is key to the success of the ecological mitigation, particularly due to the increase in recreational pressure and therefore we recommend that an outline management plan is produced to demonstrate that appropriate management will be implemented within the site.

Lighting

The ecological surveys have highlighted that hedgerow B5 important for foraging/commuting bats and it's likely that roosting bats are within the building to the NE of the site. B5 hedgerow is to be largely retained but it will be surrounded by housing and dissected by two roads and the current landscaping plan suggests that building to the NE of the site will be surrounding by landscaping. There is a need to ensure that these areas are impacted by

minimal lighting and we would encourage the minor roads/landscaping areas to have minimal or no lighting to minimise lighting impacts. However were no road lighting is proposed there is a need to ensure that security lighting is provided to all housing to ensure that appropriate lighting is fitted.

BNG

The submitted information details that the proposal will result in an anticipated biodiversity net gain of 11%. The ability to achieve the anticipated net gain will be based on the implementation of a suitable management plan as detailed above there is a need for an outline management plan to be produced to demonstrate it is achievable.

Appropriate Assessment

We have reviewed the appropriate assessment (AA) and we advise that we generally agree with the conclusions of the Appropriate Assessment that the proposal is unlikely to have no adverse impacts on the North Downs Woodlands SAC and Peter's Pit SAC . However we say generally as we are not transport experts and therefore can not advise if the conclusions of the transport assessment, which the AA is based on, are correct. We raise this issue as Increases in vehicle movements to and from the site have the potential to increase NOx (nitrogen oxide) emissions, which can alter botanical species structure and composition as a consequence of acidification and eutrophication.

The AA states the following:

North Downs Woodlands SAC: The Annual Average Daily Traffic (AADT) values modelled for road networks around the Site do not extend to the roads than fall within 200m of North Downs Woodlands SAC, as it was not considered that a significant amount of traffic would disperse onto these roads. However, AADT values modelled for the proposed development will be significantly below 1000 AADT on all roads local to the proposed development, with the exception of Chaplefield Road which provides direct access to the Site. As such, it is not considered likely that the proposed development alone would result in significant increases in traffic on roads within 200, of the SAC and consequently no likely significant effects on atmospheric pollution / nitrogen deposition would be anticipated.

Peter's Pit SAC: However, AADT values modelled for the proposed development will be significantly below 1000 AADT on all roads local to the proposed development, with the exception of Chaplefield Way which provides direct access to the Site. As such, it is not considered likely that the proposed development alone would result in significant increases in traffic on roads within 200m, of the SAC and consequently no likely significant effects on atmospheric pollution / nitrogen deposition would be anticipated.

We advise that if the LPA are satisfied with the conclusions of the transport assessment with regard to increase in traffic going within 200m of the designated sites then no further information is required and there for the LPA can adopt the conclusions for the AA. However if concerns have been raised about the conclusions of the transport assessment there will be a need for the AA to e reviewed and updated prior to the determination of the planning application.

If you have any queries regarding our comments, please do not hesitate to get in touch.

Helen Forster MCIEEM
Biodiversity Officer

This response was submitted following consideration of the following documents:

Ecological Impact Assessment; CSA; November 2020

Biodiversity Net Gain Assessment; CSA; November 2020

HRA Information Note; CSA; November 2020

From: Waste Services

Our Ref: TM/20/02749/OA

Contact: Date: 15 December 2020 Matthew Broome

Email planning.applications@tmbc.gov.uk

APPLICATION: TM/20/02749/OA

LOCATION: Land South Of Barming Station And East Of Hermitage Lane Aylesford
Kent

PROPOSAL: Outline Application: erection of up to 330 dwellings (including 40% affordable homes), together with associated open space, play areas, and landscaping (including details of access)

Please supply me with any representations you may wish to make on the above application. If a reply is not received by 29 December 2020 I will assume you do not wish to comment. The application may be viewed at www.tmbc.gov.uk/view-planning-applications.

Application: TM/20/02749/OA

Views of Waste Services

1	Presentation of bins / boxes and The Service	TMBC operates a two x wheeled bin and green box , food waste container refuse and recycling collection service from the boundary of the property with the public highway. The service operates on an alternate week basis (general refuse and food waste one week and mixed dry recycling /cardboard/paper and food waste). Paid subscription to garden waste collections are optional	Bins / Boxes must be stored within the boundary of the property and placed at the nearest point to the public highway by 7 a.m. on collection day and returned to its storage point on the property by the end of the day.
2	Presentation of bins / boxes and The Service	Although advice in accordance with The Local Plan states ` no carry distance to exceed 25m from either the bin store or house to the refuse vehicle' it is emphasised that consideration should always be given to a shorter distance that adheres to the points raised in items 1 and 5.	
3	Type and number of containers	Subject to the number and type of dwellings TMBC will decide whether individual bins apply or whether a smaller number of dwellings	Mixed residential sites of houses and flats will receive two standard size (240 litre) bins and a box although flats will

		will share larger (1100 litre) communal bins. Individual household bins with provision for recycling will be the preferred choice of the authority specific to each application.	generally receive the smaller size bins (140 litre). Bins and boxes will be provided by TMBC and all repairs, replacements, subject to normal wear and tear only will be the responsibility of the Council. Bins damaged by the user may be recharged to the managing agent or the householder.
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5	Bin storage areas	Bin storage areas must be sufficient to accommodate 240 litre bins and a 55 litre recycling box and 22 litre food waste bin for each dwelling / household and allow additional space for communal bins for collection of cardboard/food/plastic and glass	Where the bin storage area is not near to the adopted public highway then the bins must be presented at a point as close to the public highway as possible. The absolute maximum distance that a service will be provided from the presentation point to the collection vehicle is 25 metres and this should only be in exceptional circumstances as agreed with the Waste Services Team authorised representative.
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7	Vehicle access	It is important that our collection vehicles are able to have safe access and egress from the development generally and at each collection point. If this is not possible either on a permanent or temporary basis then we will be unable to provide the collection service. It should also be noted that on-street car parking often	Collection of bins from individual property boundaries, or specified presentation points and bin storage areas can be achieved where vehicle access is permitted and road constructed to highway standard and adequate to withstand frequent use by 32 tonne (gross vehicle weight) refuse freighters.
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		gives rise to delays or inability to provide the service due to access problems. Adequate off-street parking / designated parking bays and the application of traffic restrictions e.g. double yellow lines can all aid provision of the service.	<p>Appropriate turning areas (for vehicles 12.5 m x 3m, with 6m wheelbase and 4.5m height) must be designed in to the development.</p> <p>Parking restrictions e.g. enforceable yellow lines where necessary to aid access where the highway is adopted. Unadopted roads should be designed to eliminate parking in areas where access for the collection vehicles would be hindered.</p>
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10	Container details	<p>Additional information for use when designing layout and bin storage / presentation areas</p> <ol style="list-style-type: none"> a. Standard Wheeled Bin (240 litre) dimensions: 1070mm H x 580mm W x 740mm D b. Small Wheeled Bin (140 litre) dimensions: 1070mm H x 480mm W x 555mm D c. Large Wheeled Bin (360 litre) dimensions: 1100 H x 620mm W x 860mm D d. Eurobin (communal) (1100 litre) dimensions: 1470mm H x 1360 W x 1080mm D e. Standard Box (55 litre) dimensions: 500mm H x 600mm W x 450mm D f. Food waste bin (22 litre)
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APPLICATION 20/02749/OAEA

Land East of Hermitage Lane and South of Barming Station

Proposed Residential Development

LANDSCAPE COMMENTS, INCLUDING REVIEW OF THE LANDSCAPE AND VISUAL ASSESSMENT SUBMITTED WITH THE APPLICATION

For Tonbridge and Malling Borough Council

By Jon Etchells Consulting

March 2021



1. Introduction and Scope of Review

General

- 1.1 This review of the landscape and visual aspects of the planning application (to Tonbridge and Malling Borough Council, TMBC) for residential development of up to 330 new dwellings on land to the east of Hermitage Lane (20/02749/OAEA) has been undertaken by Jon Etchells Consulting (JEC).
- 1.2 The site is outside the built-up area boundary and is in the countryside in planning terms. It adjoins the boundary with the Maidstone Borough Council area along its south eastern side, and just to its south east within Maidstone is the recent housing development of Hermitage Park, with access from Hermitage Lane via the new access road of Chapelfield Way. A rectangular area between the site and Hermitage Park is owned by Kent County Council and is allocated for a future school development. A railway line runs along the north western side of the site, and Barming Station adjoins the site to the north west
- 1.3 The site lies within the area covered by Policy CP5 of the TMBC Core Strategy, which identifies a Strategic Gap between the edge of Maidstone and the Medway Gap towns to the north west, as shown on the Proposals Map for the adopted Local Plan. However, the Strategic Gap policy is not carried forward into the emerging Local Plan, and there is a draft allocation for a strategic development site (South Aylesford, under Policy LP28) within the Strategic Gap on the land to the north west of the railway line (and also extending to the south of the railway line to cover a small area to the north east of the site, alongside the A20 London Road). TMBC have also permitted development of the main part of the strategic site (under application 17/01595/OAEA), extending between the railway line and the A20 London Road at its junction with Hermitage Lane.
- 1.4 JEC was requested by TMBC to review the Landscape and Visual Impact Appraisal (LVIA) set out in Chapter 8 of the Environmental Statement (ES, dated November 2020) submitted as part of the planning application, and also to provide general advice on the landscape and visual aspects of the proposed development. The LVIA was prepared by CSA Environmental, a recognised and established landscape practice. Jon Etchells has provided landscape advice to TMBC in connection with other proposals for residential development, and has also carried out LVIAs for projects within the TMBC area (and also the adjoin Maidstone Borough Council area), and is therefore familiar with the general locality and also the application of landscape-related policy.

Scope of Review

- 1.5 The Landscape Institute have produced guidance on reviewing LVIA's (Technical Guidance Note 1/20, January 2020), and this review has been prepared with due regard to that guidance, and covers the following broad areas:
- a) Whether the methodology used in the LVIA is appropriate and recognised.
 - b) Whether that methodology has been applied in a consistent and fair manner.
 - c) Whether the coverage and content of the LVIA is balanced and comprehensive.
 - d) Whether the LVIA contains any significant errors or omissions, and whether there are any deficiencies which could be remedied by the provision of additional information.
 - e) Whether its findings in respect of landscape and visual effects appear to be balanced and reasonable.
 - f) As the LVIA forms part of an ES, whether it meets the requirements of the EIA Regulations and also whether it provides the scope of assessment agreed in advance with TMBC in their Scoping Opinion.
- 1.6 The site is described to a reasonable level of detail within the LVIA which forms Chapter 8 of the ES and also within Chapter 4, and that description is not repeated here.
- 1.7 A full LVIA of the proposals has not been undertaken as part of this review - the comments set out below are based on a review of the LVIA provided as part of the application and on site observation, and are an indication only of the likely levels of landscape and visual effects.

Methodology for Review

- 1.8 In landscape and visual assessments, a distinction is normally drawn between landscape effects (i.e. effects on the character or quality of the landscape, irrespective of whether there are any views of the landscape, or viewers to see them) and visual effects (i.e. effects on people's views of the landscape, principally from residential properties, but also from public rights of way and other areas with public access). Thus, a development may have extensive landscape effects but few visual effects (if, for example, there are no properties or public viewpoints), or few landscape effects but significant visual effects (if, for example, the landscape is already degraded or the development is not out of character with it, but can clearly be seen from many residential properties).
- 1.9 As noted above, no detailed assessment has been undertaken as part of this review, but the consideration of the LVIA submitted as part of the ES has been undertaken with regard to the methodology set out in the 'Guidelines for Landscape and Visual Impact Assessment', produced jointly by the Institute of Environmental Management and Assessment and the

Landscape Institute ('the GLVIA', 1995, revised 2002 and again in 2013), which is the generally recognised methodology for undertaking such assessments.

2. The Proposed Development

2.1 The proposed development is described in the submitted ES and shown on the application drawings and also in the Design and Access Statement (DAS) submitted as part of the application and is therefore not described in full here, but in terms of its potential landscape and visual effects it is relevant to note the following:

- a) The site is reasonably well contained, by the railway line and the vegetation alongside it to the north (and also by the distribution centre to the north of the railway line), the tall poplar shelter belt along its north eastern boundary, the rising ground and Hermitage Park development to the south and Hermitage Lane and the trees alongside it to the west. As a result, most views of the site are from the areas immediately adjoining it.
- b) The site adjoins the existing development of Hermitage Park to the south, and the land to the north of the railway line is allocated for strategic residential development, and is also the subject of a recent planning permission for that development. The access to Hermitage Park along Chapelfield Way runs along the southern site boundary and would also provide the main access to the proposed development.
- c) The tall poplar shelter belt within the site provides some internal landscape structure and separates the two parts of the site.
- d) The site is in the countryside but is not in agricultural use and does not have a fully rural character.
- e) However, as the site is within the countryside and undeveloped, the proposals would be likely to lead to some adverse landscape and visual effects.
- f) The site also lies within the designated Strategic Gap between Maidstone and the Medway Gap settlements. The gap designation will not be carried forward into the new Local Plan, but the loss of open land between the settlements could still result in some adverse effects in terms of landscape character and the setting and identity of the settlements.

3. Review of the Submitted Landscape and Visual Impact Assessment

3.1 The LVIA was produced by CSA Environmental, an established landscape practice based in Hertfordshire. The assessment is generally reasonable and thorough in terms of its scope, methodology and coverage, and has been carried out with due reference to the Guidelines for Landscape and Visual Impact Assessment (the GLVIA), though a number of comments can be made on it, as set out below in the order in which they appear:

- a) Section 8.2.11 refers to Paragraph 170 of the NPPF, but the assessment does not consider whether or not the site forms part of a valued landscape in terms of Paragraph 170. While it would be reasonable to assume that the site is not part of a valued landscape in these terms, the assessment should make this clear.
- b) Section 8.3.28 states that identified effects of moderate to substantial or greater significance are judged to be significant in EIA terms (i.e. for the purposes of the EIA Regulations), and that moderate level effects may be judged significant, according to the specific circumstances. Lower level effects are not judged to be significant, but the assessment states that they should not be ignored.
- c) In its Section 8.4 the assessment reviews landscape character assessments at national, county and Borough levels, and for the sake of clarity should have noted that there is no Borough level assessment for the TMBC area.
- d) Section 8.4.37 states that the site is '*at the lower end of medium landscape quality*', which seems generally reasonable.
- e) Section 8.4.38 states that the site '*could not be described as rural in character*' - while it does adjoin existing development to the south east and existing (and wider permitted) development beyond the railway line to the north and is not in active agricultural use, it is open and undeveloped, and does in my view have a partly rural character.
- f) The assessment states in sections 8.4.38 and 39 that the site is of low to medium landscape value and sensitivity, which again seems generally reasonable, though in my view the sensitivity to development of the type proposed could be judged as up to medium.
- g) In section 8.4.53 the assessment refers to partial views from the byway which runs to the south of the site, and states that the views are '*limited by the intervening*

orchard trees' In fact there are some clear views from this route to the site across the intervening field, and the new houses on the site would be visible extending across the view. However, the clear views are from a short length of the route only.

- h) In sections 8.7.1 and also 8.7.4 the assessment refers to Tables 8.1 and 8.2 which summarise the landscape and visual effects, but those tables do not appear to exist. However, the information referred to seems to be in Table 15.2, so it is not clear if anything is actually missing or if this is just an incorrect reference.
- i) Section 8.7.4 states that the landscape effects of the development on the site and surrounding area would be moderate adverse in Year 1, and that this effect would not be significant - Section 4 below considers whether that assessment is reasonable.
- j) The summary Table 15.2 does note that effects on the agricultural land of the site itself would be moderate to substantial adverse in Year 1, and that the effects would be significant - that effect is not brought out in the text, though (see below) the longer term assessment of moderate adverse residual effects which are not significant is mentioned.
- k) The assessment identifies moderate to substantial (and significant) visual effects for number 151 Hermitage Lane, which is adjacent to the north western corner of the site, and that assessment seems generally reasonable.
- l) In Section 8.10.2 the assessment notes that the loss of the orchard and open land within the site would be a permanent moderate adverse effect, but that it would not be considered significant. Section 8.10.3 states that the longer term effects on local landscape character would be slight to moderate adverse - Section 4 below considers whether that assessment is reasonable.
- m) In sections 8.11.11 to 8.11.14 the assessment considers the potential effects of the development on the separation between Maidstone and Aylesford, noting its location with the Strategic Gap, and also noting that the South Aylesford strategic development site effectively fills the gap between the settlements to the north and north east of the site. The assessment notes that the proposed development would reduce the present extent of open land between the settlements, but states that the railway line and station would continue to provide a physical boundary, with visual separation also provided by the trees around the station and along the railway line. The assessment also states that the planting alongside the railway line within the site would also assist in maintaining separation, but does not come to a conclusion

as to what the resultant effects on the separation between the settlements would be. I understand that TMBC do not place any weight on Policy CP5 when determining planning applications, as the policy will not be carried forward into the new Local Plan, and as the South Aylesford strategic development site has been allocated (and largely permitted) within the gap. However, the matter of separation and setting of settlements also has a bearing on general landscape character, and there would be some adverse effects in this respect.

- n) The assessment contains a section on 'Design Solutions and Assumptions' which states that the lines of tall shelter belt trees within and around the site would be retained, but does not go into detail about how they would be managed into the future. That is not a shortcoming of the assessment, as such details would normally be provided as a condition on approval, perhaps as part of a Landscape and Ecology Management Plan. However, it is worth noting at this stage that these features comprise lines of closely spaced trees which are now around 20m in height, and which will continue to grow into the future but which are likely to have a relatively short future life span. I would suggest that an appropriate condition requiring the future management of these trees to be addressed should be attached to any permission, and that consideration should be given to measures such as topping the trees to limit further upward growth, thinning of alternate trees and also their medium term and phased replacement with longer-lived specimens.

4. Landscape and Visual Effects

4.1 The assessment set out in the ES has been reviewed above - this section considers what the likely landscape and visual effects of the development would be, in order to consider whether the ES assessment is generally reasonable.

4.2 The following characteristics of the site and surrounding area and also the proposals are important in considering the landscape and visual effects which would result from the proposed development:

- a) As noted above, the site is reasonably well contained, by the railway line and the vegetation alongside it to the north (and also by the distribution centre to the north of the railway line), the tall poplar shelter belt along its north eastern boundary, the rising ground and Hermitage Park development to the south and Hermitage Lane and the trees alongside it to the west. As a result, most views of the site are from the areas immediately adjoining it. The tall poplar shelter belt within the site also provides some internal landscape structure and separates the two parts of the site.

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- b) Also as noted above, the site adjoins the existing development of Hermitage Park to the south, and the land to the north of the railway line is the subject of an allocation and recent planning permission for residential development. The main access to the site would be via the existing along Chapelfield Way access to Hermitage Park.
 - c) The site is in the countryside but is not in active agricultural use, and does not have a fully rural character.
 - d) The site lies within the designated Strategic Gap - the gap designation will not be carried forward into the new Local Plan, but the loss of some of the remaining open land between the settlements (after allowing for the South Aylesford development) would still result in some adverse effects in terms of landscape character and the setting and identity of the settlements. However, even with development of the application site, there would still be an area of open and undeveloped land to its north east, lying directly between the South Aylesford development and the north western edge of Maidstone.

4.3 Bearing in mind the above, and noting again that a full LVIA of the proposals has not been undertaken as part of this review, it is apparent that there would be some permanent adverse effects on local landscape character, and also on some views from nearby residential properties (though there are relatively few houses in the area around the site which would have significant views of the new buildings) and footpaths (and also the footbridge at the station), as a result of the proposed development.

4.4 Returning to the assessment set out in the ES, my general view is that it is detailed, comprehensive and based upon an appropriate methodology, and is in general a fair assessment of the likely levels of landscape and visual effects which would result from the development. My main comments on the levels of effects identified in the assessment are:

- a) Section 8.7.4 of the assessment states that the landscape effects of the development on the site and surrounding area would be moderate adverse in Year 1, and that this effect would not be significant - that assessment seems reasonable for the surrounding area, but effects within the site itself would be expected to be at a higher level, as the character of the site itself would change completely, and as I have noted Table 15.2 does state that effects on the agricultural land of the site itself would be moderate to substantial adverse in Year 1, and that effect would be significant. My view is that the moderate adverse effects on the area around the site should be

regarded as significant to ensure that they are given due weight in the final planning balance, while acknowledging that they would decrease over time.

- b) In Section 8.10.2 the assessment notes that the loss of the orchard and open land within the site would be a permanent moderate adverse effect, but that it would not be considered significant. Again, my view is that the assessed level of effects is reasonable, but that these long term effects should be regarded as significant to ensure that they are given due weight in the final planning balance.
- c) While I understand that the gap designation will not be carried forward into the new Local Plan, the loss of some of the remaining open land between the settlements would result in some adverse effects in terms of landscape character and the setting and identity of the settlements of Maidstone and the Medway Gap. There would still be an area of open and undeveloped land between the settlements to the north east of the site, but if that area were to be developed at some time in the future then the two settlements would have effectively merged, with only the railway line lying between them.

5. Conclusions

5.1 To return to the areas listed in Section 1.5 of this review for consideration, as a result of the review it can be said that:

- a) The assessment set out in the ES does use an appropriate and recognised methodology.
- b) That methodology has been applied in a generally consistent and fair manner.
- c) The coverage and content of the assessment is generally balanced and comprehensive.
- d) The assessment does not contain any significant errors or omissions.
- e) The findings of the assessment in respect of landscape and visual effects appear to be generally balanced and reasonable, though in my view some of its judgements as to what should constitute significant effects have not been fully justified, and it would have been better to regard the main landscape effects (assessed as moderate adverse) as significant, in order to ensure that they are carried forward and given due weight in the final planning balance.

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- f) The assessment meets the requirements of the EIA Regulations in terms of its scope and coverage, and also provides the scope of assessment agreed in advance with TMBC in their Scoping Opinion.
- 5.2 The submitted LVA is detailed, comprehensive and based upon an appropriate methodology, and its assessment of the likely levels of landscape and visual effects appears generally fair and reasonable.
- 5.3 That assessment is of initially moderate to substantial adverse effects within the site itself, and of moderate adverse effects on the character of the site and surrounding area, with those effects declining over time to moderate adverse and slight to moderate adverse respectively after 15 years. Those are relatively high level effects (the overall scale used has only three categories, slight, moderate and substantial, so moderate adverse is the second highest category), and despite the judgement in the assessment that the moderate adverse effects are not significant, in my view they should be regarded as significant and carried forward into the planning balance to be weighed against the benefits of the proposed development. In that balancing exercise it should also be noted that the site is reasonably well contained, and the effects would be limited a relatively small area within and around the site.
- 5.4 There is also the matter of the separation and identity of the settlements of Maidstone and the Medway Gap - while I understand that the gap designation will not be carried forward into the new Local Plan, the loss of some of the remaining open land between the settlements would result in some adverse effects in terms of landscape character and the setting and identity of the settlements of Maidstone and the Medway Gap. There would still be an area of open and undeveloped land between the settlements to the north east of the site, but if that area were to be developed at some time in the future then the two settlements would have effectively merged, with only the railway line lying between them.

Jon Etchells Consulting, 8 March 2021
615-Landscape Review



Technical Note

Land South of Barming Station
(TM/20/02749/OAEA)

21-024-001 Rev -

Review of Transport Assessment

July 2021

Rev	Issue Purpose	Author	Checked	Reviewed	Approved	Date
-	Draft	PL	CG	SW	JW	29/07/21

1 Introduction

- 1.1.1 C&A Consulting Engineers have been appointed by Tonbridge and Malling Borough Council (TMBC) to review the transport aspects of the Land South of Barming Station planning application (ref TM/20/02749/OAEA).
- 1.1.2 This is an outline application by Croudace Homes for "erection of up to 330 dwellings (including 40% affordable homes), together with associated open space, play areas, and landscaping (including details of access)".
- 1.1.3 On behalf of the applicant, Stuart Michael Associates (SMA) produced a Transport Assessment (TA) in December 2020. KCC Highways provided consultation comments on the submitted TA in February 2020.
- 1.1.4 Following the above, a Transport Assessment Addendum (TAA) dated March 2021 and a Technical Note dated May 2021 were submitted by the applicant to address the concerns raised by KCC.
- 1.1.5 A Travel Plan (TP) was also submitted alongside the TA which would extend the approved TP for the neighbouring Hermitage Park site.
- 1.1.6 This review is informed by the above reports submitted in support of the outline application and the consultation comments provided by KCC Highways.

2 KCC Consultation

2.1 KCC's Initial Comments

2.1.1 KCC Highways provided their comments on the TA on 11 February 2021. The main matters that were raised are as follows:

- Revised plans are required showing the secondary access proposal but amended to include a traffic island on Hermitage Lane with a minimum width of 1.6m to accommodate the signing with a minimum clearance distance of 500mm. The drawing should also include an extended footway/cycleway from Barming Station to the junction with Chapelfield Way. A RSA1 is required for the scheme.
- Further details of the proposed improvement scheme for the A20/Hermitage Lane junction including a drawing with dimensions provided and RSA1.
- A capacity assessment of the proposed improvement scheme currently being pursued by KCC Highways for the A26/Fountain Lane junction in order to assess the impact of the development is required.
- Crash details for the most recent 5-year period and an analysis of those areas showing clusters.
- Clarification on the impact of the proposed development on capacity at the Poppy Fields and A20 London Road/Hermitage Lane/Preston Hall junctions in the event that the Hermitage Lane to Poppy Fields Roundabout link road is provided or a condition to restrict development until the link road is open to traffic.
- Further clarification of the traffic distribution diagrams and traffic survey validation as outlined in the foregoing review.

2.1.2 The applicant submitted a TA Addendum (TAA) (dated 12 March 2021) to address the above comments received from KCC Highways. The applicant's responses are summarised in the next section of this report.

2.2 KCC's Further Comments

2.2.1 Following submission of the TAA, KCC Highways provided their comments on 26 April 2021 highlighting outstanding highway matters and recommending a holding objection. The main matters that were raised are as follows:

- Please extend the cycleway as shown on the secondary access drawing number 5407.003 Rev B. into the secondary access.

- Revised plans are required showing the secondary access proposal but amended to allow a running lane of 3.5m each side of the traffic island due to the amount and type of traffic on Hermitage Lane and to allow an adequate safety zone for maintenance purposes.
- The safety audit of drawing 5407.003 Rev B of the secondary access includes comments which are not adequately addressed in the Designer's Response.
- Site layout drawings to be amended to show additional space and tracking at internal junctions as described in the foregoing report.
- There are significant differences in the flows between A20/Hermitage Lane and Coldharbour Roundabout and also between Coldharbour Roundabout and Poppyfields Roundabout which is difficult to explain as there are no other turnings between the junctions. Please could this be checked.
- The proposed mitigation scheme for the A20/Hermitage Lane junction as shown on Drawing 004-SK-004 Rev A provides relief to some arms of the junction but the A20 London Road East ahead movement and the Hermitage Lane right turn movement show excessive capacity issues in the AM peak without Whitepost Field link road, which are worse than the 'without development' scenario. Additional mitigation is needed if the development is occupied prior to the delivery of the Whitepost Field link road.
- Further clarification of the traffic distribution diagrams and traffic survey validation as outlined in the foregoing review.
- A suitable improvement scheme is required to mitigate the impact of the development at the A26/Fountain Lane/Farleigh Lane junction the most appropriate solution would be to provide funding to allow the delivery of the proposed KCC dual roundabout scheme. The funding gap currently stands at circa £2.5m.

2.2.2 The applicant submitted a Technical Note (TN), dated 12 May 2021, to address the above comments received from KCC Highways. The TN is summarised in the next section of this report.

2.3 KCC's Final Comments

2.3.1 Following the submission of the TN, KCC Highways provided their final consultation response on 16 June 2021 confirming no objection to the planning application, subject to conditions and contributions.

3 Applicant's Responses

3.1 Applicant's Responses

- 3.1.1 The applicant submitted a TAA and a Technical Note to address the comments raised by KCC Highways. Following this, KCC have confirmed in their latest consultation response (dated 16 June 2021) that the previous concerns have been adequately addressed. The applicant's responses are summarised below.
- 3.1.2 The primary site access drawing has been updated (**Drawing 5407.005 Rev C**) as part of the TAA to clearly illustrate the provision of dropped kerb crossings at the access and is considered appropriate.
- 3.1.3 The secondary site access **Drawing 5407.003 Rev C** was also updated as part of the TAA to address the concerns raised by KCC/auditors to include a wider traffic island on Hermitage Lane, a footway/cycleway along Hermitage Lane and a pedestrian refuge on Hermitage Lane. As part of the TN, **Drawing 5407.003 Rev D** has been further updated to show the proposed footway/cycleway extended to at least the first dwelling into the site as requested by KCC.
- 3.1.4 In para 2.2 of the TAA, the applicant has agreed to contribute to the KCC proposed scheme for a footway/cycleway along Hermitage Lane between Barming Station and the hospital. The secondary access drawing includes the KCC proposed scheme.
- 3.1.5 In para 2.4 of the TAA, the applicant has agreed to contribute towards bus service improvements. KCC in their response dated 26 April 2021 have confirmed that this would be £910 per dwelling, £300,300 in total. The applicant has suggested (in para 2.6) that improvements at Barming station can be dealt during the reserved matters application.
- 3.1.6 KCC accepted that the Travel Plan for the adjacent Hermitage Park development can be extended to this site. However, they stated that the target for reduction of the mode share for single occupancy vehicles should be revised to 10% along with additional measures and incentives to achieve this. The applicant in para 2.9 agreed to review the targets and for the Travel Plan to be secured through a planning condition. The duration of the Travel Plan should be extended to 5 years from 1st occupation of the proposed development or until the target is achieved, whichever is the longer.
- 3.1.7 Subsequently, in the TN, the applicant has confirmed that a full Travel Plan will be submitted at the detailed design stage and have included details of car clubs and cycle hire schemes to be secured at the detailed stage.

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- 3.1.8 C&A consider that this package of sustainable travel measures is appropriate and proportionate.
- 3.1.9 Although it is stated in the TA that the KCC's Guidance Note 3: Residential Parking was considered, the TA nor the TAA provide further details on the parking provision on the site. However, it is noted that the application is in outline, and this can be dealt at reserved matters stage.
- 3.1.10 Site layout **Drawings 5407.007 Rev B** and **5407.009 Rev A** were updated to show the tracking using a refuse vehicle and a 4.8m saloon as per the KCC's comment. However, given it is an outline application, it is anticipated that a more detailed site layout, along with revised vehicle tracking will be produced at the detailed design stage.
- 3.1.11 The TA provided crash data for the five-year period to 31 December 2019. Subsequently, KCC requested review of the crash data available for the latest five-year period to include 2020. Within the TAA, the applicant provided a review of the five-year data up to 30 September 2020.
- 3.1.12 The review identified a total of 30 reported accidents within the study area of which 27 were classified as slight and three were classified as serious. No fatal accidents were reported. The review did not identify any specific safety risk associated with the highway layout, rather the accidents were due to driver error or mechanical failure.
- 3.1.13 The trip generation methodology and the anticipated development arrival and departure trips were considered appropriate and were accepted by KCC.
- 3.1.14 KCC had raised concerns with regards to significant differences in the traffic flows between the A20/Hermitage Lane Coldharbour Roundabout and also between Coldharbour Roundabout and Poppyfields Roundabout. The applicant has clarified in the TN that this is due to different traffic data sources to be representative at the time due to the COVID-19 pandemic. Therefore, under the circumstances, this was found to be acceptable by KCC.
- 3.1.15 KCC had also raised concerns with regards to the operation of the A20/Hermitage Lane junction without the Whitepost Link Road. The applicant has stated in the TN that although the proposed mitigation scheme does not make the junction within its theoretical capacity, it adequately mitigates the impact of the proposed development as well as improving the operation of a junction that would already exceed capacity in the future year. KCC have confirmed that this is acceptable and should be delivered via a S278 Agreement.

3.1.16 Finally, KCC in their final response have suggested a proportional contribution towards the A26/Fountain Lane improvement scheme would be acceptable as suggested by the applicant. Additionally, KCC has commented that each tree to be removed has a value which needs to be paid to KCC Highways landscaping Team.

4 Local Junctions - Modelling and KCC Recommendations

4.1.1 The local highway junctions that were agreed with KCC to be assessed are as follows.

1. A20/Hall Road/Mills Road
2. **A20/Hermitage Lane***
3. **Coldharbour Roundabout***
4. M20 Junction 5 Roundabout
5. **Poppyfields Roundabout***
6. Hermitage Lane/Retail Park
7. Hermitage Lane/Whitepost Field Link Road junction
8. Chapelfield Way/Site Access
9. Hermitage Lane/Secondary Access
10. Hermitage Lane/Chapelfield Way
11. Fullingpits Avenue/Hermitage Lane/Tarragon Road
12. Heath Road/Hermitage Lane/St Andrews Road
13. **Fountain Lane/A26/Farleigh Lane***
14. **A26/Red Hill/Bow Road – Watringbury Crossroads***

4.1.2 The trip generations, the forecast year and committed developments that have been used are considered appropriate by KCC. Appropriate software in the form of Junctions 9 for priority and roundabout junctions and LINSIG for signalised junctions were used to assess these junctions.

4.1.3 No concerns were raised by KCC with most of the junctions that were assessed in terms of modelling approach. KCC accepted that these would operate within capacity with the proposed development in the forecast year.

4.1.4 *KCC required further clarification in terms of traffic distribution and raised some concerns in terms of capacity of some of these junctions which are highlighted above. The applicant has adequately addressed these concerns through the subsequent submission of TAA and TN as discussed in the above section.

4.1.5 C&A have identified some further minor issues with the junction modelling.

- 4.1.6 For the A20/Hall Road /Mills Road roundabout model (TA Appendix H), the KCC proposed layout has not been provided so C&A could not validate the geometric inputs.
- 4.1.7 For the A20 / Hermitage Lane model (TA Appendix I, and Addendum Appendix D), the westbound bus lane has not been modelled.
- 4.1.8 However these are unlikely to result in significant changes to the outcomes.

A20/Hermitage Lane

- 4.1.9 It was requested that this junction should be modelled for a scenario whereby the Whitepost Field link road is not provided.
- 4.1.10 As previously mentioned, the applicant has stated in the subsequent TAA and TN that although the proposed mitigation scheme does not bring the junction within its theoretical capacity, it mitigates against the impact of the proposed development, and improves the operation of a junction that is already forecast to exceed capacity in the future year.
- 4.1.11 Without the Link Road, the PRC is -56% for the 2025 Base plus Development without Mitigation scenario. This improves significantly to -31% for the 2025 Base plus Development with Mitigation scenario. KCC have confirmed that this is acceptable and should be delivered via a S278 Agreement.
- 4.1.12 C&A consider that this is a robust approach, and provides reassurance that the impacts of the development will be mitigated in either case.

Coldharbour Roundabout

- 4.1.13 This reflects the forthcoming KCC improvement scheme. The model of this junction was amended in the TAA to reflect the geometric parameters provided by KCC. Following the update, the results indicate that the roundabout would operate within capacity with the proposed development.
- 4.1.14 KCC have requested a 'no development' condition prior to the completion of the KCC improvement scheme. This is not forecast to be completed until November 2022, according to the KCC website. C&A consider that a 'no occupation' condition would be more appropriate so that enabling works at the application site could commence.

Poppyfields Roundabout

- 4.1.15 As with the A20/Hermitage Lane junction, this junction was requested to be re-modelled without the Whitepost Field link road. The results indicates that the roundabout will be well within its capacity with the proposed development, even without the link road.

A26/Fountain Lane/Farleigh Lane

- 4.1.16 The results in the TA indicated that the junction would operate over capacity in both the Base scenario (PRC -23%) and With Development scenario (PRC -27%). As KCC are developing a longer-term mitigation scheme here, the applicant has offered to contribute towards this strategic mitigation scheme instead of a minor mitigation scheme to offset the impact of the development.
- 4.1.17 As mentioned previously, KCC in their final response have suggested a proportional contribution to bridge the funding gap towards the A26/Fountain Lane improvement scheme would be acceptable as suggested by the applicant.
- 4.1.18 The Whitepost Field development of 840 dwellings includes a contribution of £1.3m to the KCC scheme, as well as its own link road proposal which would have its own cost. KCC have requested a bridging contribution of £1.2m from the current application to the KCC scheme. This level is therefore seen as proportionate. KCC have requested that this contribution is made before any occupation, but a trigger condition relating to cumulative occupation of the two sites would be more appropriate.

A26/Red Hill/Bow Road – Wateringbury Crossroads

- 4.1.19 In their response dated 11 February 2021, KCC stated that to address the congestion and pollution issues at this junction, the applicant should be required to provide a financial contribution towards design and consultation, via a Section 106 Agreement.
- 4.1.20 This is also considered to be reasonable and proportionate.

5 Summary

- 5.1.1 The Transport Assessment and subsequent reports from Stuart Michael Associates include generally appropriate and robust calculations.
- 5.1.2 KCC have suggested measures and contributions to encourage sustainable travel at the development, and C&A consider these to be appropriate and proportionate.
- 5.1.3 KCC have concluded that the residual highway impact of the development would be acceptable subject to the agreement of mitigation measures.
- 5.1.4 C&A consider that the suggested Conditions from KCC are largely reasonable, but that it would be reasonable for the trigger point for some of the Conditions to be amended as above.