

1) Please confirm which document this representation relates to.

Schedule of Proposed Main Modifications

2) Please confirm which part of the document this representation relates to? (If your representation relates to multiple sections and/or documents, please add separate comment(s) to the relevant section on this event page)

If Main Modification (please quote number e.g. MM1):

MM159

Chapter and (if applicable) subheading:

Policy/ Paragraph number:

Policy AL/PE 4

3) Do you consider the Main Modification/ document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038):

Yes No

Legally Compliant *

Sound

*

4) Please give details of why you consider the Main Modification/ document not to be legally compliant or sound. Please be as precise as possible and provide evidence to support this. Or if you wish to support the legal compliance or soundness of a main Modification/ document, please also use this box to set out your comments.

Church Road is a narrow, residential street that already experiences significant congestion, particularly during school drop-off and pick-up times due to the presence of a primary school. Introducing vehicle access for a new housing development along this road would greatly exacerbate these issues, leading to increased traffic, reduced safety for children and pedestrians, and further disruption for existing residents. The limited width of Church Road makes it unsuitable for the higher volumes of traffic associated with new housing, especially large construction and service vehicles during the building phase and beyond.

The proximity of the primary school raises serious concerns about safety. Increased vehicle movements pose a heightened risk to young children and families who walk to school, many of whom rely on the relative quiet of Church Road for a safe journey. The additional traffic would also reduce the effectiveness of any existing school safety measures, such as crossing patrols or drop-off zones. Emergency services access could be compromised as well, given the potential for congestion and parked cars obstructing the roadway.

By contrast, Maidstone Road is a larger, more robust route that is better suited to handle additional traffic generated by a new development. It offers wider carriageways, established

transport links, and better sightlines for drivers, all of which make it a far more appropriate choice for vehicle access. Using Maidstone Road as the entry point would help preserve the character and safety of Church Road, protect the school environment, and ensure a smoother integration of the new housing into the local infrastructure.

Would you like this adapted into a formal objection letter or planning submission?

5) If you do not agree with the proposed Main Modification/ document please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified in question 4 (above) where this relates to legal compliance or soundness. Please be as precise as possible.

To make the Local Plan legally compliant and sound in relation to the proposed vehicle access for the new housing development, the following modification is necessary:

****Modification Required:****

Amend the proposed site access point from Church Road to Maidstone Road, ensuring that all vehicular access to and from the development is directed exclusively via Maidstone Road. Church Road should be retained for pedestrian and emergency access only, if required, with physical design measures (e.g., bollards or restricted access signage) to prevent through traffic from the development using Church Road as a cut-through or secondary access.

****Justification:****

This modification is essential to ensure the plan is ****"sound"*** under the National Planning Policy Framework (NPPF) tests of soundness, particularly:

- ****Justified**** – The proposed access via Church Road has not been adequately assessed against reasonable alternatives such as Maidstone Road, which offers a safer, more appropriate route for increased traffic volumes. A more robust evidence base should underpin the choice of access point, taking into account highway capacity, safety impacts near the primary school, and local infrastructure capability.

- ****Effective**** – Retaining access via Church Road would undermine the effectiveness of the plan by introducing traffic and safety issues that could impede school operations, cause community opposition, and require costly future traffic mitigation measures. Access via Maidstone Road would support more effective integration of the new development into the transport network.

- ****Consistent with national policy**** – The current access arrangement via Church Road conflicts with NPPF guidance on promoting safe and suitable access for all users (para. 110), and on protecting public health and safety, particularly in relation to schools and vulnerable pedestrians.

In conclusion, the Local Plan should be modified to specify that vehicular access is to be taken from Maidstone Road, not Church Road, to ensure it meets legal compliance and the tests of soundness.

7) Please tick this box if you wish to be kept informed about the Inspector's Report and/ or adoption of the Local Plan.

Yes, please keep me informed