



Planning Committee

Wednesday the 19th September 2018 at 7.00pm

Update Report for the Committee

The following notes and attached papers will be referred to at the meeting and will provide updated information to the Committee to reflect changes in circumstances and officer advice since the reports on the agenda were prepared

3. **Minutes** – To approve the Minutes of the Meeting of this Committee held on the 15th August 2018
 4. Amendment to Minute 107/7/18 – Waterbrook Park, Waterbrook Avenue, Sevington – Application Number 18/00098/AS
 5. Requests for Deferral/Withdrawal
 6. Schedule of Applications
- (a) **18/00410/AS - Pett Farm, Pett Lane, Charing, Ashford, TN27 0DS - Change of use of land for the stationing of a residential mobile home in connection with a farm and equestrian business**

Members are advised that this development has now been carried out and that permission is sought retrospectively. The case officer has visited the site in the light of this change and the pictures on display at the meeting show the mobile home in relation to farm buildings, the riding manege and the hardstanding between the mobile home and the fence to the rear garden of Pett House.

Members are also advised that the proposed decked area has not been removed as stated in para 8, pg 7. It has been reduced in size to a small covered area at the entrance on the north-west elevation as shown in Figure 3, pg 8 and as can be seen on the pictures on display.

Further representations

1 letter of objection has been received from the neighbour at Pett House drawing Members attention to the fact that the application for the stationing of the mobile home is now retrospective. A copy is attached to this Update Report as **Appendix 1**. In respect of the post-script recommending that the Council moves forthwith to enforcement action as a result of the recent events, whilst I do understand the objectors' frustration, the NPPG guidance requires LPAs to consider a retrospective application in the normal way with enforcement action being a remedy should a retrospective application not be granted.

With regard to the matters raised (agricultural need, overlooking, visual impact and alternative sites) these are all addressed in the report.

With regard to the objector's request for a Section 106 agreement tying the mobile home to the applicant and the farm, the NPPF advises that LPA's should consider the use of conditions in the first instance and planning obligations should only be used where it not possible to address impacts through a planning condition. In this case, an agricultural occupancy condition is proposed as Condition 1. I consider that this approach is reasonable, necessary, relevant to planning and the nature of the development concerned and is enforceable. I do not consider a Section 106 agreement is necessary in this case.

3 further letters of support of the application have been received stating the following:-

- It is essential for someone to be on site for the welfare and safety of the horse stabled overnight and also the sheep winter grazing on the farm.
- The farm has been subject to theft and so there is a need for someone to be on site to provide security.

Rewording of conditions

Adjustment to the wording of the following conditions is recommended in the light of the mobile home having been installed on site. The adjustments require details for further consideration to be submitted within a defined time period relating to any grant of planning permission rather than using 'prior to commencement' as the trigger.

Conditions 1 and 2 below are amended to reflect the specific case advanced in support of the need for the facility at the site.

Condition 1

The use of the site for the stationing of a single mobile home and the occupation of the mobile home hereby permitted shall be carried out only by Mr Boyd Roberts and any resident dependents unless otherwise agreed by the Local Planning Authority.

Reason: The site is outside any area in which residential development would normally be permitted unless essential to the local needs of agriculture or forestry and, in this case, the essential need is in relation to the applicant's pig-keeping and equestrian business.

Condition 2

The use of the site for the stationing of a single mobile home shall cease by 19th September 2021 or the cessation of the pig-keeping or equestrian uses of Pett Farm whichever shall occur first. The mobile home, concrete base and all materials and equipment brought on to the site in connection with the use shall be removed and the land restored to grass within three months following 19th September 2021 or the cessation of the pig-keeping or equestrian uses of Pett Farm.

Condition 3

Within one month of the date of this decision, details of the means of disposal of foul sewage shall be submitted to and approved in writing by the Local Planning Authority. The approved works shall thereafter be installed within one month of the approval of the

Local Planning Authority having been given and the approved works shall be retained in an effective working order whilst the mobile home remains at the site.

Condition 4

Within one month of the date of this decision, details of a landscaping scheme for the site which shall include proposed screening on the south west boundary shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out fully within a planting timetable to be agreed as part of the landscaping scheme which shall provide for planting in the forthcoming planting season. Any trees or other plants which within a period of five years following planting die, are removed or become seriously damaged or diseased shall be replaced in the next available planting season with others of a similar size and species unless the Local Planning Authority give prior written approval to any variation

- (b) **18/00029/AS - Land south of the Swan Hotel, Maidstone Road, Charing, Kent - Submission of an outline planning application for up to 135 dwellings (including up to 40% affordable housing) introduction of structural planting and landscaping, informal public open space and children's play area (LEAP), vehicular access from the A20/Maidstone Road and associated ancillary works. All matters reserved with the exception of access from the A20/Maidstone Road**

Main changes to the Local Plan

Since the publication of this report the main modifications to the Local Plan 2030 have been compiled and are now out for consultation (6 week period). The changes to policy S55. The changes are not significant and are set out below: amended is set out in the update report. Additions are shown in bold and deletions shown with a strikethrough.

4.491 The approach into the village of Charing along the A20 from the west is an important entrance to the village and the development of the site presents the opportunity to establish a clear edge on this western boundary. ~~with suitable boundary treatment of planting and landscaping adjoining lower density development on this western edge.~~ **An appropriate tree belt, supported by suitable boundary treatment, along the western edge to the development should be created. This should also extend along the northern boundary of the site, to the rear of the Swan Hotel.** In addition, ~~there is an existing tree and hedge boundary between this site and Poppyfields and this should be retained and enhanced as part of this development.~~ **the current mature hedgerows that run through the centre of the site and the tree boundaries between the site and the Poppyfields development should be retained and wherever possible enhanced.**

4.492 **Development on this site shall be directly accessed from the A20 and this access should incorporate a right-turn lane off the A20, as requested by the Highway Authority.** There are a number of options to ~~achieve direct access the site directly from the onto the A20 along the northern edge of the site which could be provided,~~ **including** ~~in coordination with the access to the adjoining S28~~

site allocation. **A suitable emergency access either onto the A20 or to Poppyfields is also required.**

4.492 a) **To improve the accessibility of the site and its connections to the village, a new footpath along the southern side of the A20 to connect with existing footpath connections at the A20/A252 roundabout junction is required. In addition, the** ~~There is no vehicular access into the adjacent Poppyfields development but there is the opportunity to create pedestrian and cycle access into~~ **Poppyfields should be explored as part of any proposal so that the** ~~this development that can link into the wider network connecting with the village and the other footpaths in the area.~~

Amend policy criteria b through to h.

b) *Create an appropriate soft-landscaped **tree belt along the** northern and western edge to the development **and along the northern boundary to the rear of the Swan Hotel;** ~~to establish a clear western edge to the development with substantial boundary planting;~~*

c) *Retain and **wherever possible** enhance the current **mature hedgerows that run through the centre of the site** and tree boundaries between the site and the Poppyfields development;*

d) *Be accessed directly from the A20 **including the provision of a right-turn lane.***

e) Provide a new footpath along the southern side of the A20 to connect with existing footpath connections at the A20/A252 roundabout junction.

f) Provide a suitable emergency access either onto the A20 or to Poppyfields.

g) ~~e) **Explore the opportunities to deliver** Provide a new pedestrian and cycle routes throughout the development to connect with the adjoining Poppyfields development and to existing adjacent PRow;~~

h) ~~f) Provide an appropriate contribution towards the provision, management and maintenance of related community facilities and infrastructure;~~

i) ~~g) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider; and~~

j) ~~h) Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.~~

In response to the main changes the applicant has confirmed the following;

- There is adequate land for a tree belt to be included to the north and west of the site and this will form part of the detailed design;
- Trees and hedgerows in the centre of the site are being retained and their retention can be conditioned;
- The access strategy includes a right turn off the A20;

- An emergency access onto the A20 is proposed via either the 3.7m strip of hardstanding to the west of the proposed access or through the Swan Hotel car park;
- The access strategy includes a new footpath on the A20 and we would be happy to provide / contribute to the cost of implementation of a continuous link to the roundabout;
- Access to Poppyfields is being explored and will continue to be so at this stage. However, access is not possible at present but this is an aspiration of the policy only and not a requirement. The proposal therefore complies with this part of the policy; and
- The proposal connects in to the existing PROW

As such the applicant considers that the proposed application would meet the amended S55 policy criteria. I agree with that assessment.

Ecology

A further letter of objection has been received 19 September from a local resident concerning ecological matters. In particular the representation makes reference to discussions with KWT who advised the objector that KWT have reassessed the site and have confirmed that it meets the Local Wildlife Site criteria within the Species Rich Grassland Category. This letter of representation is appended as **Appendix 2** to this report.

An e-mail was received 11 September from Kent County Council Ecology in response to the same information and the subsequent response from the applicant's ecologist. KCC states the following:-

"The habitat has been identified as neutral grassland but the quality is not good enough for it to be considered a priority habitat. If the management changed in the future the botanical diversity may improve however at the moment it is not of sufficient quality." As such KCC's ecological advice remains unchanged."

I remain satisfied that ecological mitigation can be suitably addressed by proposed Condition 29 (Landscape & Ecological Mitigation Plan).

Highways

Letter forwarded by Charing Parish Council from Socium (highway consultants) to the Parish Council and which also makes reference to S28. This is attached as **Appendix 3**. In summary, this states the following:-

- An assessment of junction separation has been undertaken. This has found that the proposed access associated with Land South of the Swan Hotel would be situated 47 metres to the east of the existing access to be utilised for the Land rear of Charing Motors development and associated mixed use scheme. The workshop access is located 54 metres to the west of this access.it is noted that the typical parameter for adjacent junction spacing is 60 metres, for local distributor roads, with an absolute minimum spacing of 30 metres (KCC Guidance).

- Whilst the spacing between the accesses is above the absolute minimum parameter outlined, two right turn lanes will be provided on the A20 to accommodate the needs of the two sites under consideration. These right turn lanes lie immediately adjacent to each other. Given their proximity, it is likely that vehicles turning right into the sites may confuse the two right turn lanes on approach.
- it is considered that the proximity of the junctions and the changes in junction working associated with the planned development at this location, will increase the opportunity for highway safety issues to arise, due to the increased risk of driver confusion and conflicting vehicle movements.

In response KH&T has advised that the scale of the development at S28 does not require a right turn lane. A right turn lane is not therefore proposed to serve S28. KCC have confirmed that they have nothing further to add to their previous responses in relation to S55 and S28. Furthermore, the applicant has also responded making the following points;-

- The length of the right turn lane proposed has been designed in accordance with the required standards and agreed with KHS.
- The volume of traffic likely to be generated by the Charing Motors site will be minimal during the peak periods. As such, the potential for conflict is minor.
- The Road Safety Audit would have considered all aspects of the proposed design including the spacing and interaction of adjacent junctions.

My conclusion on the highway acceptability of the development therefore remains as per the report. The works to the highway will be the subject of a s.278 agreement.

General updates

In respect of Table 1, discussions are ongoing between the applicant the Council and the Parish Council in relation to local projects for which S106 contributions are being sought. The Council and the agent are in the process of agreeing the condition wording and good progress has been made.

- (c) **17/01926/AS - Land rear of Charing Motors Ltd, Northdown Service Station, Maidstone Road, Charing TN27 0JS - Outline application for the erection of up to 17 dwellings and associated infrastructure with means of access from Maidstone Road to be considered in detail**

Since the publication of this report the main modifications to the Local Plan 2030 have been compiled and are now out for consultation (6 week period). The changes to policy S28 are not significant however the policy as amended is set out below with additional added text in bold and underlined and removed text shown struck out. Para 4.928 has also been added in respect of the need for well-considered additional structural **Planting** and this is reflected part (d) of the

proposed Policy text. In the light of that, I propose to reinforce the point by an additional Informative.

Amend Policy S28 as follows:

Land at Northdown Service Station is proposed for residential development for an **indicative capacity** of ~~up to 20 dwellings.~~ 20 dwellings. Development proposals for this site shall:

- a) Be designed and laid out in such a way as to protect the character and setting of the **Kent Downs AONB and surrounding** countryside. Particular attention needs to be given to the topography of the site, **impact upon the adjoining AONB** and advice in the Charing Parish Design Statement. **The development should comprise a mix of dwelling types with a maximum of two storeys in height;**
- b) Provide vehicle access onto the A20 Maidstone Road, as shown on the policies map;
- c) Retain the existing employment uses on the frontage where possible;
- d) Retain and, **where possible**, enhance the hedge and tree boundaries around and within the site, particularly where there is adjoining countryside, **and provide additional structural planting along the western boundary;**
- e) Ensure that any land contamination issues are satisfactorily investigated and resolved or mitigated.

Additional Informative

The applicant is advised that well considered additional structural planting will be required on the site boundaries, particularly in respect of the western boundary.

1 additional condition is requested

No dwelling the subject of this permission shall be occupied until the petrol filling station and shop (granted planning permission for redevelopment under ref 17/00865/AS) has ceased trading and the buildings on the site demolished.

Reason: To ensure a comprehensive development across the whole of this allocated site and in the interest of residential amenity.

- (d) **18/00947/AS - Two Oaks Farm, Bourne Road, Aldington, Ashford, TN25 7AW - Part First Floor Extension**

Appendix 1 – Representation from Mr J E Hosking

For the attention of the Chairman and members of ABC Planning Committee
Wednesday, 19th September 2018.

18/00410/AS Temporary change of land use for new residence at Pett Fm, Charing

*I am the owner-occupier of Pett House, the nearest residence to the proposed site, where I have lived for the past 50 years. I farmed at Pett Farm (including pigs) for 25 years, and I have observed a number of commendable improvements made there by the applicant in the last three or four years. However, for the following significant reasons, I find it necessary to **OBJECT** to the current application.*

Please read the PS overleaf before continuing.

Planning reasons

1. **Overlooking:** The proposed site for the new house would be within 25 yds of my property, and at least 10 ft above my house; it would undoubtedly harm the amenity of my property. 'Overlooking' is an acceptable and established reason for refusing planning permission. Local ABC Policy HOU5 states that "non-isolated residential development must not harm neighbouring uses or the amenity of nearby residents".
There is no natural screening between the proposed site and my property.
2. **North Downs AONB:** Pett Farm lies within this protected area, in which visual impact is all-important. The new dwelling would be in an exposed position on the perimeter of the farmstead, where it would have maximum impact on visual amenity, and be clearly seen from the Pilgrims' Way. It would certainly not 'conserve and enhance the character of the landscape' (required by the Nat. Planning Policy Framework).

Other reasons

1. **Alternative sites:** It is not essential for the dwelling to be placed where proposed. There are several equally-suitable (if not more so) sites which would fit more comfortably within the 'existing cluster of built development', with the following advantages:
 - Avoid harm to neighbours' amenity and AONB visibility
 - Less exposed, more central, more convenient position within farmstead
 - Easier connection to services
 - Better scope for close supervision and management
 - Improved, more direct sight-line to entrance, stables etc.
 - Better visibility of other farm activities and contact with visitors
 - Easier acceptance of deliveries.
2. **Consultants' Report (Rural Planning Ltd):** This application requires the applicant to establish an over-riding agricultural need for an on-site residence. As a farmer (retired), I do not believe the report proves a need at Pett Farm and disagree with its optimistic conclusions, for the following reasons:
 - The applicant is primarily a landlord, letting land (>60%) and buildings to other people, but care of livestock is the principal reason given for the applicant's wish to live on site. However, he claims responsibility for only a few pigs and out-of-hours oversight of DIY livery horses (a non-

agricultural activity); agisted sheep are separately tended by their owners.

- A 'sound financial basis' has not been demonstrated. The forecast "viability of the venture" is too optimistic, especially bearing in mind recurrent slumps in the pig market.

[Overleaf

2/2

Additional Comments

A. Report of ABC Head of Development Management & Strategic Sites

- Plans do not show the points from which water and electricity will be taken, nor the location of the sealed cesspool (para.9). Applicant's description is accepted without question.
- Quoting from HOU5 (para.18), the report ignores reference to avoidance of 'harm to neighbouring uses or the amenity of nearby residents'
- The interests and convenience of the applicant (para.43) are supported in the report at the expense of my amenity and rights.
- There is no evidence of a serious attempt by ABC to involve objectors in securing a successful outcome or acceptable compromise.
- Undue importance is attached to sight-lines (para.31); the application is for a house, not a watch-tower.
- Close-board fencing at the rear of my property (para.35) should not be relied upon to solve the overlooking problem. Provision of effective screening for that purpose is the sole responsibility of the applicant (See 'Conditions' (4) below).

B. Conditions

If the Committee is minded to grant the application, I ask that the following points be taken into consideration:

- Restrict permission to the applicant (not to 'the person solely or mainly working ...' etc. as suggested in Condition 1), and only so long as he is engaged with the whole farm
- Condition 2 (expiry of temporary period) would be acceptable, but specifically cessation of pig-keeping or equestrian uses (not just 'agricultural uses') should trigger termination and removal of house at any time.
- Tree screening (Condition 4) would be essential. It would have to (a) consist of 8-10 ft evergreen trees (not mixed native), (b) be planted at least 6 ft from and along the entire length of the north-east boundary between my property and the applicant's, (c) at no greater intervals than 4 ft, (d) with strict conditions re maintenance, replacement etc. for at least five years.
- Condition 5 (external lighting) would be acceptable, with added condition that no CCTV cameras are to face my property.
- Add a Section 106 planning agreement, so that the house would be attached to both the applicant and the whole farm as at present constituted, so that one could not be sold without the other.
- Add a condition to remove any Permitted Development Rights which may arise following success of this application.

I would ask that I be consulted before any conditions are agreed with the applicant, especially in regard to Condition 4 (Landscaping Scheme).

P. S. I have become aware during the last few days that the applicant has 'jumped the gun', and already completed a substantial part of the dwelling in question, without first obtaining planning permission. This action fits with a history of Pett Farm - in which unauthorised changes of use take place, followed by ineffectual enforcement - and appears to invalidate the current application, prejudice further discussion, and render the above notes obsolete. I therefore invite the Planning Committee to declare the application void, and to issue forthwith an enforceable Order for removal of the home (said to be 'mobile', so should be easy to move), accompanied by a Stop Notice or Injunction against its use in the meantime.

Failure by the Council to take such action will reinforce the appearance of impotence, encourage others to think they can also disregard the regulations with impunity, and make further participation by honest objectors seem rather pointless.

18/00029/AS Appendix 2 – letter from J Langton 19/09/18

Planning Application 18/00029/AS for 'Land south of the Swan Hotel'

Planning Committee 19th September 2018

Jacky Langton BSc MSc
Bethany
Pluckley Road
Charing
TN27 0AQ

I object to the application for several reasons, explained in my online statement of 27/03/2018. However, I now would like to concentrate on the ecology of the land which is the subject of this enquiry.

The site is a lowland meadow and it has high biodiversity. Some of the plants here are so rare in Kent that they have been placed on the Kent Rare Plants Register. Bog Pimpernel, a plant which is only found in four other sites in Kent, and is declining because of habitat loss¹, was seen growing and flowering very well along one of the streams. Fen Bedstraw (*Galium uliginosum*) was flowering profusely and clambering up the vegetation in damp areas in one of the meadows; this is a plant found in only six other sites in Kent, and again is declining because of loss of habitat¹. Both are on Kent Rare Plants Register.

Some other species recorded here and in decline are Greater Burnet-saxifrage (*Pimpinella major*) and Burnet Saxifrage (*Pimpinella saxifrage*)¹. There were many species which occupy 25 or fewer sites in Kent¹, growing and flowering well, such as Blue Water Speedwell (*Veronica anagallisi-aquatica*) and Common Yellow-sedge (*Carex demissa*). In addition Adder's-Tongue Fern (*Ophioglossum vulgatum*) is recorded on site in the FPCR Ecological Appraisal.

Over 150 flowering spikes of Spotted Orchid (*Dactylorhiza fuchsii*) were recorded in one meadow and over 250 in the next – unusual in such large numbers.

Clearly this plant community would be supporting a high number of invertebrate species, and vertebrates would be part of the community. Various butterflies were noted (Large White (*Pieris brassicae*), Green-veined White (*Pieris napi*), Meadow Brown (*Maniola jurtina*), Common Blue (*Polyommatus icarus*), and a Small Copper (*Lycaena phlaeas*), and a large Grass Snake (*Natrix natrix*) was disturbed, basking by the stream.

Indicator species are species (in this case plants) which can tell a story about a site, they can give information about the status of a particular habitat, and they reveal whether or not the site is worthy of protection. When surveying a site, the distribution of **indicator species** is assessed.

In his communication of 3rd of September, Matthew Loak of FPCR (who are providing ecological information to Gladman Developments Ltd.) refers to the response of Vincent Galley of Kent Wildlife Trust (KWT) (11th July 2018). He says that the grassland present on the application site is not considered to be species-rich in its present state owing to the **low frequency of indicator species** recorded within the Ecological appraisal (FPCR November 2017). This refers the number of each species recorded, and is low because some are to be found only in the damp areas around the waterways. He does not mention the other point made by Vincent Galley, that there is a **high number of different indicator species recorded**, and thus he under-values the site.

Subsequently, and taking into account further data that I sent to KWT regarding the presence and distribution of indicator species, Alison Riggs of KWT reassessed the site and in the communication of 18/09/2018 (forwarded to ABC) she confirms that she thinks that the site meets the Local Wildlife Site criteria, fitting the category of Species Rich Neutral Grassland.

This is a very rare habitat in Kent, occupying only 3.4% of Kent's total neutral grassland². Kent Wildlife Trust (KWT) cites a 95% loss in lowland meadows since 1935³. As a scarce habitat, unimproved by agricultural disturbance, it is an important and valuable site, a refuge for many interesting and uncommon species and well worth conservation.

With further evidence now available, Helen Forster of KCC (consultee communication 11/09/2018) might wish to revise her comments.

Although mitigation for the negative impacts of development can be sought, this is difficult to control in the long-term, and in this case would be exceptionally hard to implement because particularly interesting habitats for some species are spread widely in the damper areas around the numerous waterways. If there is any possibility of alternative sites being found for development, I feel strongly that this one should be protected.

If the development were granted permission, mitigation should be sought, not just for small corridors which would not be sustainable, but of a large area of at least 0.8 ha, to be managed as Species Rich Neutral Grassland. In addition there would be an opportunity to enhance and restore an area of Wet Woodland, another UK Priority Habitat, and mitigation measures should also include this.

¹ Philp, E. G. (2010). *A New Atlas of the Kent Flora*, Kent Field Club

**18/00029/AS Appendix 3 – Letter from Socium to Charing Parish Council
dated 18/09/18**



Jill Leyland
Charing Parish Council
Charing Parish Hall
Station Road
Charing
Kent
TN27 0JA

Our ref: PL/HA/13260

18 September 2018

Dear Jill,

Planning Application References 18/00029/AS - Land South of the Swan Hotel, Charing and 17/01926/AS - Land rear of Charing Motors, Charing

Further to Charing Parish Council's instructions, we understand that the planning applications relating to Land South of the Swan Hotel, Charing (18/00029/AS) and Land rear of Charing Motors, Charing (17/01926/AS) are due to be determined at planning committee on 19th September 2018, both with recommendations for approval, subject to Section 106 negotiations. The former site comprises the development of up to 135 residential dwellings, with access to be derived via a new priority junction onto the A20; the latter site is for the development of up to 17 units, with access to be taken from an existing priority junction on the A20.

It is noted that both sites form part of the draft Local Plan with Land South of the Swan Hotel forming part of the Land adjacent to Poppyfields (Policy S55) allocation and Land rear of Charing Motors forming part of the Northdown Service Station (Policy S28) allocation. As part of the draft allocation for the latter site, planning permission has recently be granted for the development of a mixed-use scheme, including commercial and residential units (Charing Motors, 17/00865/AS). This scheme will be accessed via the existing priority junction for the aforementioned Land rear of Charing Motors.

In addition to the above applications, a site located directly to the west of the proposed mixed-use scheme was granted planning permission for the development of a new workshop facility and associated parking (12/00161/AS), which has been operational for

several years. This site also comprises part of the Northdown Service Station (Policy S28) allocation.

In response to the Parish Council's concerns regarding the potential highway safety implications arising from the proximity of the vehicular accesses from the A20, an assessment of junction separation has been undertaken. This has found that the proposed access associated with Land South of the Swan Hotel would be situated 47 metres (measured from centreline to centreline) to the east of the existing access to be utilised for the Land rear of Charing Motors development and associated mixed use scheme. The workshop access is located 54 metres to the west of this access. A copy of the plan demonstrating the junction spacing is enclosed for reference. Within Kent County Council's (KCC) Kent Design Guide 'Designing for Movement' it is noted that the typical parameter for adjacent junction spacing is 60 metres, for local distributor roads, with an absolute minimum spacing of 30 metres.

Whilst the spacing between the accesses is above the absolute minimum parameter outlined, two right turn lanes will be provided on the A20 to accommodate the needs of the two sites under consideration. These right turn lanes lie immediately adjacent to each other. Given their proximity, it is likely that vehicles turning right into the sites may confuse the two right turn lanes on approach. This could result in vehicles entering the first right turn lane when they require access to the second. These vehicles would then either need to return to the running lane, which may cause conflict with vehicles travelling along the A20, or they may continue straight into the second right turn lane, overrunning the hatched space between the two lanes. This could result in conflict with vehicles wishing to enter the second right turn lane from the A20, as vehicles entering the right turn lane will be unaware of the intentions of the vehicles leaving the first right turn lane, which may result in a collision.

As part of the Land South of the Swan Hotel application, up to 135 dwellings will be developed. From discussions with the Parish Council, it is noted that a further 80 units could be developed as part of the draft Local Plan allocation for the site. This would further intensify the use of the access points in question, giving rise to enhanced opportunities for conflicting vehicle movements.

In addition to the above, at the current time, a petrol station and garage facility are located on the Charing Motors land, with two points of entry provided, which appear to be utilised as separate 'in' and 'out' access points. Whilst this is not directly signposted, the two access points appear conducive to such an arrangement. On completion of the Charing Motors mixed-use development, each access point will provide both entry and exit to the workshop and mixed-use scheme respectively, altering the nature of the existing access arrangement and the vehicle movements undertaken.



The strategic nature of the A20 results in high traffic volumes, with HGVs routinely utilising the route as an alternative to the M20. The intensification of use of these access points, in conjunction with the two-way movements at each, may result in greater opportunities for conflict. Additionally, right turning vehicles exiting the workshop access will now have to cross the right turn hatching associated with the development proposals under consideration, enhancing the distance travelled to exit the junction and therefore the time required for exiting the junction. This may further impede vehicle movements and result in greater conflict opportunities.

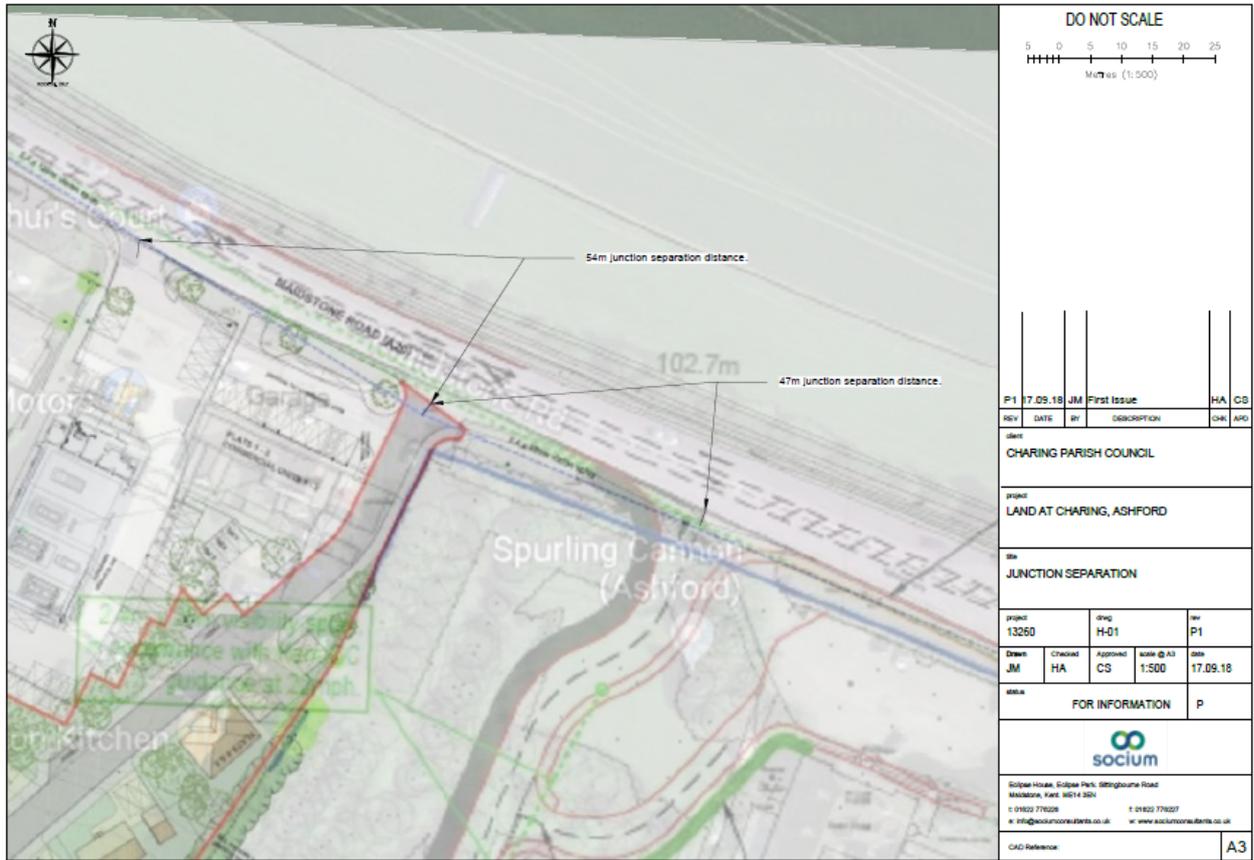
It is noted that neither KCC Highways and Transportation (KCC H&T), nor the independent road safety audit undertaken as part of the Land South of the Swan Hotel application, have considered the implications of the junction spacing and the potential conflicts that may arise from this. Given the above, it is considered that the proximity of the junctions and the changes in junction working associated with the planned development at this location, will increase the opportunity for highway safety issues to arise, due to the increased risk of driver confusion and conflicting vehicle movements.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Paul Lulham", positioned above a black redaction bar.

Paul Lulham
Director

Encs. Junction Spacing Plan



DO NOT SCALE					
REV	DATE	BY	DESCRIPTION	CHK	APP
P1	17.09.18	JM	First Issue	HA	CS
Client CHARING PARISH COUNCIL					
Project LAND AT CHARING, ASHFORD					
Site JUNCTION SEPARATION					
Project	13260	Drawn	JM	Checked	HA
Disc	H-01	Approved	CS	Scale @ A3	1:500
Rev	P1	Date	17.09.18	Drawn	JM
Status FOR INFORMATION					P
Solum House, Solum Park, Sillingbourne Road Medstone, Kent, ME14 2BN t: 01622 776228 e: info@solumconsultants.co.uk w: www.solumconsultants.co.uk					
CAD Reference:					A3

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