

Draft

Summary of Objections on behalf of The Joint Parishes Group to Kent International Gateway Limited: Rail Freight Interchange

Planning Policy

The application proposals are contrary to the approved development plan and emerging replacement policies. The site is located outside the defined settlement boundary where there is a general presumption against new built development. It also forms part of a Special Landscape Area and Strategic Gap, whilst the area to the north comprises part of the North Downs Area of Outstanding Natural Beauty (ANOB).

Maidstone Borough Council's Local Development Framework (LDF) Core Strategy document that identifies land to the south east of the town as a potential location for principally residential development is only at the Preferred Options stage. Such proposals will be subject to extensive further public consultation, including an Examination in Public to test their soundness. Development to the south east of the town is not therefore adopted planning policy or indeed a foregone conclusion.

Business Case

The applicants indicate that in terms of loaded units, 65% of inward daily journeys to the National Distribution Centre element of the proposal will be by road, whilst the corresponding figure for outward journeys is some 75%. With regard to its Regional Distribution Centre function, some 75% of daily loaded inward journeys will be by road, whilst the corresponding figure for outward journeys is 100%.

From the information provided by the applicants, it is clear that the principal method of servicing the development will be by road. The operational need and business case for locating an inter-modal freight facility at Junction 8 of the M20 has not therefore been proven. The sustainability benefits of the proposal are also far from clear, since it may not result in a significant transfer of freight from road to rail thereby providing little benefit to the wider environment in terms of reductions in CO₂ emissions.

Highways and Accessibility

The site's current accessibility by public transport, cycle and walking is poor. This combined with a 24 hour shift working pattern is likely to result in the majority of employees using private motor vehicles to access the site. The proposed development is likely to generate some 5,500 daily vehicle movements from employees, visitors and service staff, together with over 3,800 HGV movements. In total therefore, the development when fully operational is likely to generate in excess of 9,000 vehicle movements a day.

Maidstone and its surrounding area already suffer extensively from traffic congestion and becomes grid locked in a very short time. Any further congestion at Junction 8 will put additional pressure on Junctions 6 and 7 resulting in further localised traffic congestion, particularly around Grove Green and New Cut.

Any benefits derived in terms of CO₂ emission reductions from the transfer of freight from road to rail will need to be offset by emissions from the number of vehicles travelling to and from the site and from the resulting local traffic congestion.

Socio-Economic

The application proposals are unlikely to create a range of jobs suitable for local residents, since there is likely to be a significant mismatch with the employment skills base of the local population. Consequently, it will be necessary for the development to draw on a wide catchment area in order to meet its labour requirements, which is a further example of its poor sustainability.

The application fails to assess the impact of the development on the day to lives of local residents and those living in settlements within the surrounding area. It will introduce a totally incomprehensible quantum of development and associated activities to a rural setting, thereby transforming its character and function from being largely rural to one that is industrial and urbanised. The likely influx of migrant workers and its potential as a terrorist target will introduce a range of social issues that to date, have largely been absent from the local communities that surround the site, and will place additional burdens on already overstretched public services.

Environmental

The proposed development is of an alien nature, scale and form that will completely change the character of the site and surrounding area. The development will be seen from views looking south from the Pilgrims Way and the upper slopes of the North Downs. Long distance views of the North Downs ANOB from south of the A20 are also likely to be significantly affected, as will the ease and perception of travelling to and from the ANOB.

The development will have an adverse impact the setting and character of the area's cultural heritage, including the Listed Barn at Barty Farm, Bearsted Conservation Area and historic monuments such as Thurnham and Leeds Castles.

The site and surrounding area provides a diverse habitat for birds, animals and plants. These are likely to be affected by physical changes resulting from the construction phase of the development and from noise, light and pollution once it is operational.

The site overlays a major aquifer which forms part of a public water supply catchment. The introduction of a major industrial complex will inevitably increase the potential for the contamination of this supply. In addition, the site contains several watercourses that will be subject to change from culverting and from being within an urban rather than rural setting with the associated increased risk of pollution.

The development will result in noise 24 hours a day from train movements, HGVs and operations from within the site. In addition, residents within the surrounding areas will be subject to noise from workers travelling to and from the site on a 24 hour basis.

The site will be continuously light during the night making it highly visible, in particular when viewed at a distance from the north and south. This will change the rural character of the surrounding area and is also likely to have an adverse impact on wildlife.

Dust pollution is likely to be particularly acute during the construction stage, and once operational, additional pollution will be caused by the anticipated 9,000 daily vehicle movements generated by the development. Maidstone and in particular the M20 Corridor, already suffers from atmospheric conditions that result in adverse air pollution. Traffic generation on the scale proposed by the development will only exacerbate this problem.

Conclusion

The application proposals will introduce an alien form of development to a rural setting completely destroying its character and social function. The scheme will have a devastating impact on the local landscape, including the setting of the North Downs ANOB. Other impacts are likely to be in terms of air quality, noise wildlife and ecology together with traffic generation.

Whilst it is acknowledged that there are likely to be sustainability benefits from the transfer of freight from road to rail, the location of any such inter-modal facility should be informed by comprehensive studies undertaken by relevant stakeholders and not on the basis of a speculative planning application.

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