

Simon Jones, Corporate
Director of Growth,
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&
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Date: 22nd September 2026

Via email

Dear Sir

**Re 26/502754/REM – Land East of Albion Road and Copper Lane, Marden
Approval of reserved matters (appearance, landscaping, layout and scale
sought) for the erection of 117 dwellings, together with associated
landscaping, open space and other associated infrastructure, pursuant to
outline permission 23/504068/OUT
(allowed at appeal APP/U2235/W/24/3345817).**

The highway arrangements for the above planning application were agreed by the Planning Inspector in December 2024 following an appeal, see above references.

The Planning Inspector allowed the highway proposals, noting in paragraph 22 of his judgement:

“In the light of the appellant’s revised approach to access summarised above, KCC observed via correspondence of 8 October 2024 that ‘...whilst it is disappointing that the appellant is unwilling to bring forward a more straight forward solution, the acceptability of the proposed pedestrian access strategy has been demonstrated in technical terms...’ “.

At the appeal hearing in November 2024 Marden Parish Councillor Richard Adam CEng FIHT MICE (and currently Head of Highways and Drainage Engineering at a major transport infrastructure organisation) described the Parish Council’s severe concerns about the highway proposals for Albion Road, see Appendix A. The Inspector referred to Councillor Adam’s contribution being of ‘particular relevance’ in paragraph 8. Now that the reserved matters proposal has come forward to Maidstone Borough Council the Parish Council and residents have further reviewed the highway proposals and remain extremely concerned about the road safety implications.

The scheme was drawn up over 2 years ago and before the Russet Grove development was fully occupied. To reassure the entirely justifiable road safety concerns of residents we would request that an updated road safety appraisal of the

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proposed scheme is undertaken. In addition to the practicality and safety for through traffic caused by nearly 60m of priority single lane working, particular reassurance is needed that:

- a) the road safety of those residents in Seymour Drive, The Wickets and properties on Albion Road directly affected by the scheme – Jewell House, Jewell House Cottage, Bishops House, Kontiki, Derwen House and The Howlands – will not be compromised; and
- b) similarly for the safety of cyclists using the narrowed carriageway and pedestrians crossing Albion Road to access PROW KM281 which has been identified as a key connection to the village centre.

The Inspector said in paragraph 116 of his judgement that *“Albion Road could no longer be used by some agricultural equipment”*. We think this is untenable for a village surrounded by agricultural land, where large agricultural vehicles regularly use the road. He suggests in paragraph 119 that *“Howland Road could be used by larger vehicles”*. Howland Road is totally unsuitable for larger vehicles as was demonstrated by the recent prolonged closure of the A229 near Cross at Hand. We also request that a full safety assessment of Howland Road is undertaken, especially considering the very narrow bend by Rose and Crown Cottages, to assess whether it is wide enough for large agricultural vehicles, to safely pass along the road without impacting pedestrian, cyclist or motorist safety as well as the safety of residents and properties.

Yours sincerely

Alison Hooker

Alison Hooker
Clerk to Marden Parish Council

cc.

Katie Lam MP

Mr Peter Osborne, Kent County Councillor Cabinet Member for Highways

County Councillor Brian Black

Karen Britton, Maidstone Borough Council Head of Planning and Economic Development

Maidstone Borough Council Case Officer, Jourdan Alexander

Maidstone Borough Councillor Grace Couch

Maidstone Borough Councillor Claudine Russell

Maidstone Borough Councillor Michael Summersgill

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APPENDIX A

Appeal Statement given by Cllr Adam at the Appeal Hearing for Land at Copper Lane/Albion Road application: 12th November 2024.

Good morning and thank you for providing the opportunity to speak. My name is Richard Adam and I'm a long-standing member of Marden Parish Council.

I also have a 43-year career as a fully qualified professional in the field of highway engineering and now hold a senior position where I am the technical authority for all highway design matters within my organisation.

The parish council recognises that the site between Albion Road and Copper Lane in Marden is allocated for housing in Maidstone Borough Council's adopted Local Plan Review document for 2021 to 2038.

As such, we do not object to the proposed development in principle, much as some of our village residents might wish us to, as we need to take a pragmatic view and work towards the best outcome for the parish as a whole.

This appeal relates to an outline application for up to 117 houses and associated infrastructure, with all matters reserved apart from access, but safe and convenient access between the site and the village centre has always been the parish council's main concern.

You will have seen our grounds of objection to the planning application, and some of these were expanded upon in our September 2024 representation for the appeal.

In October 2024, the appellant provided a new scheme to alter the highway layout along the length of Albion Road north of the site towards the village centre in an attempt to address some of Maidstone Borough Council's grounds for refusing the application.

The parish council made a second representation last month, specifically about this appeal scheme, and then a third in November when the appellant's proofs of evidence were made available.

You may be relieved to hear that I do not intend to repeat the many detailed points we have previously made today, but it is important that all three representations are read together as one.

However, there is a further aspect that we would like to draw to your attention to, namely the standards and guidance published by Active Travel England in respect of infrastructure design for the three active travel modes: walking, wheeling and cycling.

As I'm sure you know, Active Travel England is the government's executive agency responsible for making walking, wheeling and cycling the preferred choice for everyone to get around in England.

Active Travel England has developed a suite of tools to support the development of designs and the assessment of design quality for active travel interventions and schemes.

The design tool most relevant to the appeal scheme is the Route Check, which assesses a wide range of metrics using the common Red / Amber / Green rating approach.

Additionally, for the Safety Check tab in the Route Check spreadsheet, there is a Black rating for so-called 'critical issues' that need to be designed out. In terms of footway width, this is a critical issue for the appeal scheme.

When taken together with all the other safety-related deficiencies highlighted in our three representations, it is clear that Kent County Council should not have withdrawn its objection following presentation of the appeal scheme.

If I may speak personally for a minute, I don't like to come here to criticise the work of fellow professionals in public, but road user safety is a serious matter, and in this case, that needs to be done.

In my career, I have never seen a scheme involving so many compromises that would variously affect the safety (and convenience) of all road users: pedestrians, cyclists and motorists.

Were such a scheme be referred up to me at work, there is no way that I could consider recommending that for approval. The designers would be invited to go back to the drawing board and try again.

Anyway, on behalf of Marden Parish Council, I ask the inspector to use his independence and not rely on the Kent County Council letter dated 8 October 2024, because that fails to address many of the relevant road safety issues.

If one imagines a good road layout design at one end of the spectrum, the appeal scheme would fall off the other end because it not only ‘scrapes the bottom of the barrel’ in term of technical standards and guidance but also goes below that. The design attempts to do the impossible within the available road-space along Albion Road and of course fails.

In summary, the parish council is not saying that there isn’t some way to achieve safe and convenient access for pedestrians and cyclists between the proposed housing development and the village centre without also introducing avoidable hazards and delays to motor traffic using Albion Road.

However, we are saying that the appeal scheme clearly isn’t the answer. We therefore request the inspector to reject the appeal on the numerous grounds of road user safety (and also convenience) identified in our three representations and the additional ‘critical issue’ raised today.

Thank you, and if it would help the inspector, I would be happy to hand over these notes for the written record.