

TOWN AND COUNTRY PLANNING ACT 1990

**APPEAL BY KENT INTERNATIONAL GATEWAY LTD
APPU2235/A/09/2096565/NWF**

**PROPOSED RAIL FREIGHT INTERCHANGE, WAREHOUSING AND
ASSOCIATED DEVELOPMENT**

APPLICATION MA/07/2092 LAND EAST OF MAIDSTONE

KCC HIGHWAYS

SUPPLEMENTARY PROOF OF EVIDENCE

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ON BEHALF OF KENT COUNTY COUNCIL

**TOWN AND COUNTRY PLANNING (INQUIRIES PROCEDURE)
(ENGLAND) RULES 2000**

Highways Supplementary Proof

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Appendices

S1 – Queue Survey – A20 / Willington Street and New Cut Road Junctions

**S2 – Maidstone Modelling Review (Technical Note 04)
Parsons Brinkerhoff (August 2009)**

S3 – Draft Maidstone Hub Transport Package

1.Introduction

1.1 The purpose of this Highways Supplementary Proof (HSP) is to present further details of the work that has been done to substantiate my concern over the traffic and transport situation relating to the Maidstone Local Development Framework, and the threat that KIG represents to the delivery of the SEP housing target.

1.2 This HSP describes the conclusions that can be drawn from the Jacobs Report on Model Forecasting that was been issued to the Inquiry on 21st October, Document KCC 4.4

1.3 The work has used the base case identified in Table 9.1 on page 27 of Mr Rivers proof. I understand that this is the final version of the appellant's view of the site operation, which has been modified since production of the Bilateral Highways Statement of Common Ground between the appellant and the Highways Agency (HA). It represents the appellant's view of the proportion of National and Regional Distribution activities. It does not represent the advice given to MBC/KCC on the more likely operation of the site with 90% Regional Distribution activities. Discussions are ongoing over the use of caps and targets within a Travel Plan to set an upper limit on peak hour and daily trip generation, above which the site operator would pay a contribution towards the Maidstone Hub Transport Package. I understand that the Travel Plan is due to be presented to the Inquiry in support of a Unilateral Undertaking by the appellant, but this has not yet been formally presented. In principle, caps and targets should reflect the Department for Transport expectation that a Travel Plan should support increased choice of travel modes and promote and achieve access by sustainable modes (page 4 bullet points of DfT Summary of Good Practice Guidelines – Delivering Travel Plans through the Planning Process – Core Document 6.5.12).

1.4 The work also taken into account emerging information that will inform debate on the spatial distribution of future housing, retail, and employment in the updated Core Strategy of the LDF. The Borough must delivery 11,080 new homes and 10,000 new jobs by 2026.

1.5 In particular, it reflects the expectation of 4,000 homes being delivered in the south east urban extension by 2026, rather than the previous figure of 5,000 +, and also a significant reduction (more than 50%) in predicted retail floorspace needs (as shown in the recently published "Update Report – Retail Needs Assessment Study for Maidstone Borough – August 2009"(Core Document 6.5.1). Table 5 on page 14 identifies the relevant figures.

1.6 The work for 2026 has initially concentrated on the evening peak to meet the Inquiry deadline, as it will be the most sensitive to changes in the retail floorspace provision. Table 4-D on page 4-6 (KCC 4.4) shows that a similar pattern of increasing flows on the network in the vicinity of the KIG site in the morning peak.

2. Model Calibration

2.1 I append a copy of a technical note produced by Parsons Brinckerhoff (PB) on behalf of the Highways Agency (HA), as Appendix S2

2.2 This technical note expressed their concern over the calibration of the VISUM model, and its suitability for assessment of the KIG application. In particular, there was concern expressed in Section 2 of S2 the note over the representation of turning movements at the motorway junctions, and in particular at junction 8, and the consequent potential difference in the junction capacity calculations when considering the specific impact of KIG.

2.3 This concern was addressed by Jacobs in their report that was attached to my proof as Appendix 4 of my main Proof (KCC 4.2). This confirmed that the model was well calibrated for the strategic appraisal of the Maidstone network, and identified that PB were correct to question that some of the individual turning movements were less closely correlated with the most recent turning movement counts. Jacobs extracted the model flows into ARCADY calculations (as shown in Section 2.5 of their report), showing that the overall results reached the same conclusion at the 2017 timescale as the growth factor method used by DWP.

2.4 The main use of the model will be to provide a base from which to investigate various measures for dealing with future predicted demand for travel in Maidstone, both in terms of improvements to sustainable transport, infrastructure provision, and the management of the demand. It is therefore critical for this stable base to be achieved. It does so through a process called convergence, where the model establishes patterns of movement that are dependent on predictions of how the road and transport networks cope with the demand for journeys. This is effectively the estimation of the time and cost of making journeys, and the routes taken. These results are then fed back into the model. If the model is stable, the resulting predicted pattern of movement will remain the same. The general principle is that all travellers will make their journeys in the manner that is most convenient and cost effective.

2.5 PB also expressed concern (in paragraph 4.7.1 of S2) over the use of the model at 2026, on the basis that it was initially unable to deal with the predicted level of development growth being proposed. This initial problem has now been overcome, and the model has been stabilised at 2026. This has been done by varying the distribution of housing and reducing the retail trip generation. The model includes a first application of positive demand management, with the inclusion of the A274 Sutton Road Bus Lane, a new Park and Ride site in the vicinity of the urban extension, and a general increase of bus frequency on all the main radial routes into the town.

2.6 Mr Harwood has stated in his proof that the HA now consider that the model is adequately calibrated for the assessment of strategic transport issues across the Maidstone network (paragraph 1.2.4.), and we will continue to liaise closely with the

HA as the evolution of the Hub Transport Strategy continues. Their particular interest will be the effect on the strategic network, and they are likely to seek reassurance that KHS & MBC will make every reasonable effort to deal with the required growth by sustainable means.

3.Maidstone Hub Transport Strategy

3.1 The model is effectively a tool that projects forward on the basis of demand for trips. It is not appropriate to regard this as demand that must be fully catered for.

3.2 The challenge for the Hub Transport Strategy will be not just to keep pace with the development growth, but exceed it, with the aim of creating more sustainable patterns of movement, and encouraging more people to change their mode of travel away from the private car. The Hub Package would contain a range of measures, including improved public transport, traffic management, and the improvement of highway capacity, if appropriate, through road building and junction improvements.

3.3 The Strategy must create the opportunities for people to make more use of buses, trains, cycling, and walking, and to ensure that they take these opportunities. Maidstone needs to be able to enhance its role as the county town of Kent and raise the quality of its commercial activity, as required by the SEP Policy AOSR7.

3.4 There is a balance to be struck between the creation of additional road capacity and (where possible) the careful management of traffic demand. The preferred approach would be to use positive means – that being the investment in infrastructure which promotes existing and enhanced (where possible) public transport (bus, park and ride, train) , and walking and cycling connections from new housing developments to existing and new offices, shops, schools etc.

3.5 The measures for modal shift will be most effective in dealing with journeys being made to and from the centre of Maidstone and other destinations around the town. It is the trips being made around the periphery as part of longer distance journeys that are more difficult to make by sustainable transport. These journeys are not confined to the eastern side of the town, but it is in this area that a significant proportion of the new housing development is to be located, and is served by the least congested motorway junction.

4. Current Situation at the A20/Willington Street Junction

4.1 Both Mr Rivers of DWP (in Section 10.10 on page 39 of his Proof) and Mr Heard of StopKIG (in Paragraph 3.3 on page 12 of his Proof) refer to this junction in their Proofs, and express concern over its capacity.

4.2 By way of illustration, I am attaching (as Appendix S1) a queue length survey that was carried out in May 2008 at the A20/Willington Street and New Cut Road junctions. The Willington Street junction was equipped with MOVA loops in 2001, and the potential improvement suggested by Mr Rivers in paragraph 10.10.4 of his Proof is already in place. The junction therefore operates as efficiently as is possible. For information, MOVA loops (microprocessor optimised vehicle actuation) are additional to the conventional queues detection loops at a traffic signal controlled junction, and are placed further away from the junction stop lines as an addition facility. Their purpose is to detect very long queues that may occur and adjust signal timings accordingly.

4.3 The results of the queue survey shown in Appendix S1 show that additional capacity is difficult to achieve.

4.4 In the morning peak, the “inbound” queue on the A20 Ashford Road reaches a maximum of 500 metres, while the queue on Willington Street shown reaches 200 metres. The main queue forms on the Ashford Road outbound from Maidstone, as drivers are using the route from Junction 7 via New Cut Road to avoid congestion in the town centre. This movement is shown on the queue diagram for the New Cut Road junction, with a maximum left turn into the A20 from New Cut of nearly 300 metres. The queue approaching Willington Street on Ashford Road from the west can reach up to 1000 metres, but could only be reduced by forcing longer delays on the other two arms of the junction, leading to a higher likelihood of drivers diverting onto the minor roads around Bearsted and Downswood.

4.5 The pattern is similar in the evening peak, although the maximum queues are shorter – being 200 metres inbound on Ashford Road and 400 metres outbound.

4.6 These figures confirm that the junction is currently heavily loaded, and congestion will escalate as growth continues into the future.

5. Model Results

5.1 The attached Jacobs Report (KCC 4.4) shows the evolution of traffic movements in the eastern quadrant of Maidstone as development progresses from the present day up to the SEP horizon of 2026.

5.2 The work is set against a background of a town centre network that is currently congested at peak times. Figures shown in the Local Model Validation Report (Core Document CD/5.5) identify the lengthy travel times on the main routes through the centre (Tables 7-E and 7-F on page 7-5 of the report (CD 5.5)).

5.3 Routes around the centre are also congested, particularly the route between the A274 Sutton Road and the M20 at Junction 7, via Willington Street and New Cut Road. This route acts as an unofficial inner eastern bypass to the town centre.

5.4 Table 4-C on page 4-5 of CD 5.5 identifies the flows on the various routes. It shows the effect of increasing traffic on the main routes, in that congestion and delays build up and inevitably lead to a combination of long delays on these routes, and extensive diversion onto rural and minor residential roads. By way of example, the flows shown in row 3 of the Table for Willington Street suggest a doubling of the two way demand flow from 1109 (596 + 513) in 2007 to 2317 (1391 + 926) by 2017, leading to the rise in the flows crossing the minor roads screenline in row 1 of Table 4-D on page 4-6.

6.The Situation in 2017

6.1 The 2017 situation was described in KCC 4.2 Appendix 4 . This generally concurs with the conclusion drawn in Mr Rivers' Proof, and accepted by the HA, for that timescale. In principle, the main roads and junctions in the vicinity of the site come under increasing pressure, with the M20 and A20 link Road junctions reaching, but not exceeding, their theoretical capacity.

6.2 Table 4-C (on page 4-5) of KCC 4.4 shows that flows continue to rise on the wider network from the present day, as housing and employment is provided to meet the SEP targets.

6.3 As time progresses towards 2017, if KIG is permitted, it will exacerbate the congestion problems on the main road network, being particularly apparent at the A20/Willington Street junction. This leads to diversions across the minor road network, as shown in Table 4-C, and summarised as cordon counts in Table 4-D (page 4-6) KCC 4.4

6.4 The next step in the process will be the identification by Maidstone Borough Council (MBC) in the next few months of their priorities for the distribution of future development – housing (including the urban extension), retail, and employment. This process will be informed by the various reports on land availability and market trends that are emerging. The Strategic Housing Land Availability Assessment and Retail Needs Study are the first of these documents.

6.5 This is the next stage in the evolution of the revised Draft Core Strategy, and will take the debate from the original position of the Preferred Option through to a document that uses the emerging evidence to identify the general locations for housing (within the town centre, urban extension, and elsewhere) to reach the 11,080 SEP target figure. It will also identify the prospects for regeneration in the town centre and priorities for retail and employment locations to try to fulfil SEP Policy AOSR7.

6.6 From this position, the draft Hub Transport Strategy shown in Appendix S3 must become more focussed to target support for the future pattern of movements. This must allow the delivery of the SEP targets, must maintain and enhance accessibility to the town, and must have regard to road safety and the environment.

6.7 This Hub Strategy, in a supporting role to the LDF Core Strategy, will be the subject of public consultation next summer.

7.The Situation in 2026

7.1 The model has been developed to prepare and evaluate options for the LDF transport strategy, and hence has to look forward to 2026. It presents a strategic view of movements across the network, showing the broad patterns of movement and the likely response that travellers will make to changing circumstances, on both the highway and public transport networks.

7.2 The information used to represent the future development scenario for 2026 is the best estimate that KHS can make, based on current planning information.

7.3 The main issues that can be identified are:-

- a) the requirement for the LDF Core Strategy to deliver 11,080 new homes by 2026
- b) the expectation that a south east urban extension must deliver up to 4,000 of these homes
- c) the problem of increasing congestion and delay on the main routes in and around the town.
- d) the key role that Junction 8 will play in serving longer distance trips that will seek to avoid congestion in the town, being the only access to the M20 serving Maidstone that does not currently experience extensive peak hour congestion.
- e) the expectation that this level of development to the south and east of the town will require the construction of the South East Maidstone Strategic Link (SEMSL) as part of the Maidstone Hub Transport Strategy, as referred to in paragraph 25.31 on page 281 of the SEP.

7.4 The mechanism for funding the SEMSL will be the subject of debate through the LDF consultations. The principle would be that major road building would be a last resort, and would only be pursued if a combination of sustainable transport measures could not be shown to provide adequate support for the SEP growth targets.

7.5 If the Hub Transport Strategy did not include the SEMSL, the situation would be that;-

- a) its role in relieving the growth of congestion in the town centre would be lost, and
- b) it would be more difficult to develop sites in an already congested central area, and

- c) further congestion would be caused at the already congested M20 Junctions 5,6 and 7.
- d) some development might progress in the south east sector, but not the full urban extension, but not the urban extension that is necessary to meet the SEP target, and traffic will still be seeking routes to Junction 8 to avoid congestion at the other motorway junctions, leading to continuing use of the B2163 through Leeds and Langley, and extensive diversions through rural lanes and residential roads.
- e) as the capacity at the A20 Link Road roundabout has been reached by 2017, congestion would further increase

8. Impact of KIG

8.1 The model shows that, by 2017, the town centre is congested, the routes around the centre are congested, and that extensive diversion of traffic onto rural and minor residential roads is happening.

8.2 The role of the SEMSL will be to facilitate and serve the urban extension, and to allow longer distance trips to and from the eastern side of the town to gain access to the M20 without having to pass through the town centre or the Willington Street/New Cut Road route to Junction 7. It is also intended to take sufficient pressure off this route to curtail the use of the minor rural and residential roads by diverting traffic, and to allow traffic from south east of the town (ie from the Sutton Valence and Headcorn direction) to leave the A274 and use the new road to bypass the villages of Leeds and Langley.

8.3 Tables 4-C and 4-D in KCC 4.4 show how great a challenge that this will be. It shows the pattern of increasing flows on Willington Street to 2017 (row 3 of Table 4-C) and increasing levels of diversion on to the minor roads (row 1 of Table 4-D).

8.4 The queue survey in Appendix S1 above has identified the current state of congestion at the A20/ Willington Street junction. The model figures for 2017 show flows building up on Willington Street, and the resulting diversion across the screenline of routes south of the A20 (Spot Lane, Otham Lane, Old Mill Road, and Caring Lane)

8.5 If the SEMSL is to perform its proper role, and justify the investment of funds in its construction, it must ease this situation.

8.6 The model shows flows on Willington Street as 596 (northbound - NB) and 513 (southbound - SB) in 2007 (row 3 of Table 4-6) of KCC 4.4.

8.7 The 2017 column shows this rising to 1391 (NB) and 926 (SB) in the evening peak, with a further rise of 52 vehicles (SB) to 978 if KIG is added. This seems logical, as KIG traffic would be heading away from the site in the evening.

8.8 The expectation in the SHLAA is that the urban extension will come on stream from 2013/14 onwards. The importance of the SEMSL in supporting the urban extension is acknowledged in paragraph 25.31 of the SEP. It is also required to fulfil a role in relieving Willington Street and the minor roads in the eastern quadrant of the town.

8.9 The 2026 model flows show that this has been achieved in the southbound direction on Willington Street, but not significantly northbound, which remains high at 1297 vehicles. The effect of this can be seen in Line 1 of Table 4-D, where the screenline for flows on the minor roads south of the A20 show a jump from 671 in

2007 up to 1468 in 2017 (and 1502 with KIG), and a further rise to 1627 in 2026 (and 1650 with KIG).

8.10 The first row of this Table shows a similar overall pattern for the morning peak.

8.11 These figures show that a general pattern has been established. The nature of the model work is strategic. It gives an indication of how drivers are likely to react to increasing congestion. It would be inappropriate to claim exact accuracy for all flows on all roads, hence the use of a screenline to illustrate a general trend. However, it is clear from the queue survey at the A20 junctions of the Willington Street and New Cut Road junctions (Appendix S1) that the main north-south route on the eastern side of the town is currently congested. The inevitable consequence of increasing growth is the tendency of drivers to seek less congested alternatives, and the figures shown in Table 4-D clearly of KCC 4.4 show this.

8.12 The actual dispersal of movements across these routes (identified in the map presented as Figure 1 of KCC 4.4) is likely to be variable, in that a build up of traffic on Spot Lane (for example) would result in delays at the tight traffic calming chicanes that were introduced some 15 years ago running down from the Ashford Road southwards. However, if flows on the rural lanes rise, drivers would encounter difficulty in passing oncoming vehicles on the narrower sections of these routes. This is particularly true for Otham Street, Otham Lane, New Road, Caring Lane, and Old Mill Road. The variable widths are compounded by winding alignments, with poor forward visibility.

8.13 North of the Ashford Road (between the A20 and Ware Street) Yeoman Lane and Roseacre Lane are both narrow. The northern section of Roseacre Lane has no footway. The Landway, running parallel to these roads, is a suburban housing estate road, and includes access to a primary school.

8.14 The use of all of these roads by large volumes of diverting traffic would raise safety concerns. It would particularly discourage movement on foot and by cycle. The residential road network gives access to local schools, shops and other facilities, which allows trips to be made to local destinations without use of cars. There are shops and a primary school at Madginford south of the A20, and Roseacre Primary School to the north. The lanes south of the A20 are very rural in nature, often narrow and lined by trees and hedgerows. Otham Lane, Caring Lane and Old Mill Road are good examples. Increasing volumes of traffic would be detrimental to this environment.

8.15 The figures in Table 4-D of KCC 4.4 indicate that the delivery of the SEP targets will put a heavy strain on the road network, leading to diversion by many hundreds of vehicles in the peak hours onto the rural lanes and minor residential roads, irrespective of KIG. The challenge for the Hub Transport Strategy will be to manage the network to relieve this pressure on vulnerable areas.

8.16 The presence of KIG in the vicinity of Junction 8 would add (from Table 9.1 of Mr Rivers' Proof) a minimum of 397 vehicles onto the network in the morning peak, and 444 in the evening, raising the level of congestion on the main routes. The second screenline shown in Table 4-D of KCC 4.4 (row 2) illustrates the growth in east-west

traffic on Ashford Road and Bearsted Road when KIG is added to 2026 flows - increases of 66 (2342-2276) in the morning peak and 286 (3383-3097) in the evening - and exacerbating the problem of relieving the minor roads.

8.17 This pattern is set against the delays at the A20 Link Road roundabout at Junction 8, shown in Table 4-F on page 4-7 of KCC 4.4. This shows a build up of queues by 2026, and effectively showing that the SEMSL is not fulfilling its required function (as described in paragraph 8.1) Although the addition of KIG does not appear from these figures to have a major incremental impact on queue lengths, its presence is very significant in traffic capacity terms. Table 4-E is showing that the model predicts an increase of only 83 through movements in the 2026 evening peak. This is suggesting that the junction is so heavily loaded that KIG traffic will be causing other drivers to divert away from the area to avoid the congestion.

8.18 A major investment of funds, some £45million, would be required to construct the SEMSL. The scheme's value lies in its support for the delivery of the SEP and its role in giving respite to increasing traffic problems across the highway network on the eastern side of Maidstone. To achieve this, it would have to accommodate trips from the 4,000 new homes at the urban extension and relieve the build up of traffic on Willington Street and relieve the minor road network.

8.19 The presence of KIG, generating a minimum of around 400 (in the a.m. peak) or 440 (in the p.m.) will inevitably make the task harder.

8.20 Its impact is likely to be much greater than its mathematical proportion of the overall total movements across the network. If granted permission, it is likely to be established and operational before the main part of the urban extension, and before the construction of the SEMSL. Its presence would bring the A20 Link Road junction up to full capacity by 2017.

8.21 The South East Plan identifies that 90% of the new housing should be provided in or adjacent to the town. The preferred option of the Core Strategy is that 4,000 houses should be provided in an urban extension on the south east side of Maidstone. The SHLAA supports this. It is proposed that the SEMSL would support the urban extension and act as a bypass to the town. Having regard to this and the considerable work carried out in the planning process, and the further transport assessments carried out by VISUM, I maintain the concerns expressed in my original proof and draw the following conclusions :-

- a) In 2017, the situation with KIG implemented, the A20 Link Road Roundabout at M20 Junction 8 reaches but does not exceed its theoretical capacity, but the overall pressure on the network significantly adds traffic to Willington Street and minor local roads as well
- b) In 2026, the model shows, as is inevitable, an increase in demand across the network as the Borough fulfils its obligations under the SEP
- c) The SEMSL is necessary to accommodate the required growth in housing in the SEP

- d) The SEMSL will serve and facilitate the planned urban extension referred to in the SEP, and relieve the growth in town centre congestion. It will also fulfil its function in allowing traffic to reach the motorway without travelling through the villages of Leeds and Langley.
- e) The model shows that the SEMSL will only deliver its full effect of reducing the impact of traffic on local roads if there are also increased modal shift initiatives
- f) KIG would increase pressure on the network, and would result in the addition of traffic on the A20 corridor, thereby forcing other traffic onto unsuitable roads.
- g) KIG would result in increased travel times in the town, and greater delays at junctions.
- h) The model also shows that the benefits that the SEMSL would bring would be rapidly eroded by the impact of KIG, undermining its value, and therefore its ability to attract funding.
- i) With the presence of KIG, the prospects of achieving a successful transport strategy would be significantly reduced, and the network is unlikely to operate satisfactorily.
- j) With KIG, the ability to accommodate the required level of housing would undoubtedly be jeopardised.

9. General Summary and Conclusions

9.1 This section draws together the various strands of traffic information that have been presented and assessed.

9.2 The highway network in and around Maidstone is extremely busy. The town centre is very congested at peak times, with long queues forming on the main routes. This congestion encourages drivers to seek routes around the centre, both on the main roads and the minor routes.

9.3 The SEP imposes an obligation on MBC to deliver 11,080 new homes between 2006 and 2026. Some 2,000 have already been built, leaving a total of approximately 9,000. An indicative 90% of the total should be in or adjacent to the town.

9.4 In addition, SEP Policy AOSR7 refers to the requirement to confirm the broad scale of new business and related development already identified and give priority to completion of the major employment sites in the town. In terms of the quality of employment, it puts emphasis on higher quality jobs to enhance Maidstone's role as the county town and a centre for business, and that it must support high quality proposals for intensifying or expanding the technology and knowledge sectors at established and new locations.

9.5 The Borough Council's Preferred Option for the LDF Core Strategy has identified that substantial greenfield allocation for housing land is needed to deliver the SEP target. The SHLAA and subsequent MBC Cabinet Report has confirmed that a south east urban extension could deliver some 4,000 homes by 2026, with the potential for additional housing beyond this date.

9.6 This accords with the situation at M20 Junction 8 being the only motorway junction serving Maidstone having capacity to accept additional traffic. The connection to the urban extension being made by the SEMSL, as identified in paragraph 25.31 of the SEP.

9.7 The future levels of traffic generated will be a serious challenge for an already congested town centre network, and congested access to the strategic road network. Junction 8 has a key role to play in the SEP target delivery. The presence of KIG would exacerbate the level of future congestion, undermine the role of the SEMSL, and put additional pressure on the surrounding road network. In particular, the impact of using up capacity in the vicinity of Junction 8 would lead to an increase in drivers seeking diversions via unsuitable residential and rural lanes. This is contrary to SEP Policy T1 (vii) which states that local development documents "include measures to minimise negative environmental impacts of transport and, where possible, to enhance the environment and communities through such interventions"

9.8 In my view, KIG would prevent achievement of the development targets as set out in the SEP, as well as frustrate the LDF process, and should not be granted planning permission.