

**Land West of Teynham (21/503906)
and Land South and East of
Sittingbourne (21/503914): Transport
and Highways Review**

ADDENDUM

client: Teynham, Doddington, Lynsted with
Kingsdown and Tonge Parish Councils

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Glossary

AADT	Annual Average Daily Traffic
CIHT	Chartered Institution of Highways and Transportation
CRF	Congestion Reference Flow
DfT	Department for Transport
DMPO	Town and Country Planning (Development Management Procedure) (England) Order 2015
ES	Environmental Statement
IEA	Institution of Environmental Assessment
KCCHA	Kent County Council Highway Authority
MfS	Manual for Streets
NCN	National Cycle Network
NH	National Highways
NPPF	National Planning Policy Framework
NTEM	National Trip End Model
PIA	Personal Injury Road Traffic Accident
PROW	Public Right of Way
RFC	Ratio of Flow to Capacity
SBC	Swale Borough Council
SMC	Sustainable Movement Corridor
SNRR	Sittingbourne Northern Relief Road
SRN	Strategic Road Network
SSRR	Sittingbourne Southern Relief Road
STS	Sustainable Transport Strategy
TA	Transport Assessment
TAG	Transport Analysis Guidance
TRO	Traffic Regulation Order

1 INTRODUCTION

Overview

- 1.1 This Addendum report follows an original Transport and Highways Review (Railton TPC Ltd, June 2024) submitted to review transport and highways information supporting proposed major developments West of Teynham (ref. 21/503906/EIOUT: up to 1,250 dwellings and other land uses) and South and East of Sittingbourne (ref. 21/503914/EIOUT: up to 7,150 dwellings and other land uses). The West of Teynham site is referred to subsequently as the **Northern Site** and South and East of Sittingbourne is referred to as the **Southern Site**. The two sites together are described as the **Combined Site**.
- 1.2 This Addendum should be read in conjunction with the original Railton Report.

Summary of New Documents

- 1.3 Since the original Railton report was submitted, the applicant has made some changes to the proposals and has responded to comments from both Kent County Council Highway Authority (KCCHA) and National Highways (NH).
- 1.4 The applicant has submitted five new documents dealing with transport matters. A Planning Statement Addendum has also been submitted. In total these documents comprise 870 pages.
- 1.5 As a general comment, the Technical Notes that have been produced by C&A are riddled with typographical errors to the extent that the meaning of the text is sometimes obscure. It appears that none of the work has been proof-read.
- 1.6 The following sections provide a summary of the changes to the applications since the original report and a review of the responses from KCCHA and NH. Where comments and responses comprise matters of explanation or clarification of details that do not materially affect the assessment of the impact of development, these are not repeated.

Updated Executive Summary

- 1.7 The final section confirms whether the conclusions and objections set out in the original report remain relevant and summarises any further matters that have been raised in the applicant's further submissions.
- 1.8 In response to comments from NH, the applicant seeks to justify the approach that has been taken to planning whereby all matters, including access, are reserved. This Addendum provides evidence (**Section 4**) to show that **conditions that seek to make the proposed development acceptable in transport and highways terms cannot meet the six tests, set out in the National Planning Policy Framework (NPPF), that must be satisfied when conditions are imposed. Access should not, therefore, be dealt with as a reserved matter.**

2 CHANGES IN PROPOSALS

2.1 Table 1.1 of the Planning Statement Addendum¹ identifies the documents that constitute those currently relevant. This confirms that the original Transport Assessment (C&A, January 2024) remains unchanged. Similarly, the Environmental Statement (Entran, October 2022) including Chapter 7 that deals with Transport and Access is not subject to any alterations as a result of changes to the applications.

2.2 Despite no changes having been made to the Transport Assessment and Environmental Statement, five response reports have been produced that deal with issues raised by KCCHA and NH:

- Highsted Park: Technical Note (Amended): Response Note to KCC Highways and Comments, C&A, August 2024 (TN 036A);
- Highsted Park: Response to National Highways Technical Report 09 July 2024, Montagu Evans, August 2024;
- Highsted Park: Technical Note (Amended): Response Note to NH July 2024 Comments, C&A, August 2024 (TN 037A);
- Land West of Teynham: Technical Note: Response Note to KCC Highways and PROW Comments, C&A, July 2024 (TN 034A);
- Land West of Teynham: Response Note to NH July 2024 Comments, C&A, August 2024 (TN 035A).

2.3 The contents of these reports are considered in the following two sections.

2.4 The Planning Statement Addendum highlights a number of matters that have altered since the initial submissions. These are summarised in the following table with brief commentary:

Planning Statement Addendum ref.	Amendment	Affects transport ?	Comment
Table 1.1	Parameter Plans	No	
Table 1.1	Phasing Plans	No	
Table 1.1	Structuring and Framework Plans	No	

¹ Highsted Park Planning Statement Addendum, Montagu Evans, August 2024

Table 1.1	Illustrative Drawings	No	
Table 1.1	Outline Development Specification	No	
Table 1.1	Local Area Study	No	
Table 1.1	Sequential Test	No	
Table 1.1	Urban Design Comment Response	No	
Table 1.1	Mineral Safeguarding Response	No	
Table 1.1	LUC ES Review Response	No	
Table 2.1	Lawful Development Certificate approved for building 755 at Kent Science Park	No	
Table 3.1	Indicative Dwelling Mix	Yes	Total dwellings reduced from 8,000 to 7,150*. Dwellings are no longer split into private and affordable. The total number of 1/2 bed flats has reduced from 1,150 to 1,000. 2 bed houses have reduced from 2,350 to 1,660. 3 bed houses have reduced from 3,000 to 2,855. 4 bed houses have increased from 1,350 to 1,460 and 5 bed houses have increased from 150 to 175. Larger properties now comprise more of the development.
Para. 3.10	Education provision	Yes	Up to 2 x three-form primary schools and a campus primary and secondary school changed to 2 x three-form entry primary schools, a two-form entry primary school and a standalone eight-form entry secondary school.
Para. 4.8 (and others)	Reference to Ufton Court Farm appeal Inspector's Report	No	Related to housing supply calculation
Para. 4.49 onwards	NPPF 2024 Consultation	Yes	Para. 4.50 makes reference to the revised NPPF para. 112 that refers to a vision-led approach to promoting sustainable transport
Para. 6.16	Brickwork mineral extraction	No	
Para. 8.9	Benefits of development	No	Lists some transport benefits including improvements to Sittingbourne Station, a new bus service, cycle routes, improvements to the PROW network. None of these have changed since the original submissions.

* 7,150 dwellings were assumed for the assessments that were reviewed in the original Railton report

2.5 The changes in the site layout shown on the various plans appear to be very limited in terms of transport. Most of the highway connections with the surrounding network, the Sittingbourne Northern Relief Road (SNRR), the Sittingbourne Southern Relief Road (SSRR) and the layout of internal roads appear unchanged.

2.6 The exception appears to be the proposed A2 roundabout that appeared on the previous Composite Masterplan (Milton Studio Drg. No. 2782-208A) but is now 'blanked out' (see Milton Studio Drg. No. 2782-208C). The Planning Statement Addendum makes no reference to any change in the Masterplan. The other revised plans (Framework Plans,

Parameter Plans) provide no details of the junction. The Planning Statement Addendum identifies the original TA as still being current. This includes a plan of the A2 roundabout junction. It therefore appears that the approach that is being adopted towards this junction has not changed. However, the removal of the junction from the Masterplan needs to be explained by the applicant.

3 REVIEW OF KENT COUNTY COUNCIL HIGHWAY AUTHORITY RESPONSE

Land West of Teynham

Background

- 3.1 KCCHA provided comments on the Land West of Teynham proposals on 26 June 2024. C&A have submitted a response to these comments in a Technical Note dated July 2024 (TN 034A). The following assess whether this additional information alters any of the conclusions that were drawn in the original Railton report.

Personal Injury Road Traffic Accidents

- 3.2 A request was made for more details of personal injury road traffic accidents (PIAs) to be provided. The response document provides more detailed information. The original Railton report raised a concern that Lower Road, that is likely to be significantly affected by the proposals and has a very poor highway safety record, had not been subject to highway safety assessment (see paras. 5.8 to 5.14 of Railton report).
- 3.3 The latest information provides more details but focuses only on junctions. Lower Road itself is not subject to any assessment. Table 2.19 and Figure 2.30 of TN 034A identify four PIAs at the Frognal Lane/Lower Road junction over a five year period. The accompanying text states, *'Each of the four recorded incidents had a differing cause and no pattern can be discerned that would suggest an issue that would merit mitigation'* (para. 2.2.57). The statement reveals the lack of knowledge and experience of the author. It is misleading to refer to *'causes'* of PIAs. Contributory factors should be examined to assess whether PIAs display common features. In this case, two of the PIAs involved vulnerable highway users (one pedestrian and one cyclist) and two appear to have involved excess speed (one vehicle leaving the carriageway and a rear end shunt).
- 3.4 It is well known by local residents and by KCC that Lower Road is used as a rat-run and that some vehicles travel at high speeds. The author has observed this problem while on site. The small amount of data examined by the applicant at the Frognal Lane junction provides further evidence of the problem yet the applicant remains blind to it.
- 3.5 **It is concluded that the additional information provided by the applicant does not alter but confirms the concerns about highway safety impacts on Lower Road that were raised in the original Railton report.**

Modelled Highway Connection with Lower Road

- 3.6 KCCHA sought clarity on how the connection between the site and Lower Road has been modelled.
- 3.7 The explanation provided in TN 034A does not provide clarity. Extracts from model networks are provided but links are not labelled and the text is unclear.
- 3.8 Notwithstanding the lack of clarity on the point as a whole, the text confirms that the development will connect with Lower Road and that some traffic is expected to use Lower Road to travel via Station Road to and from the A2. No additional information is provided to deal with the concerns, raised in the original Railton Report, that the proposed development will have an unacceptable impact on Lower Road.
- 3.9 It is worth noting that whereas Table 5.1 of the original Northern Site TA Volume 7 predicts **reductions** in traffic flows on Lower Road resulting from development (see paragraph 5.13 of original Railton report), Figures 5.1-5.4 of TA Volume 7 show **increases** in flows on Lower Road as summarised below:

Figure 3.1: Applicant's Predicted Changes in Traffic Flows on Lower Road

2038 Reference Case				2038 With Development				AM
								PM
<div><div>00</div><div>00</div></div>				<div><div>13469</div><div>7049</div></div>				

Sustainable Transport Strategy

- 3.12 No additional information is provided to suggest that the concerns about sustainable travel raised in the original Railton report are not still relevant.

Link Capacities

- 3.13 Section 5.7 of TN 034A seeks to demonstrate that the predicted traffic flows along the A2 with development are within the roads link capacity. Reference is made to TA 79/99 Traffic Capacity of Urban Roads (now withdrawn). Table 5.10 of TN 034A sets out the theoretical capacity of sections of the A2 and compares this with the modelled flows along the A2. TN 034A fails to explain which modelled flows are shown, whether the figures refer to the Reference Case or the situation with development.
- 3.14 The information in TA 79/99 is based on an assumption that traffic is split 60:40 with the higher direction of flow quoted. TN 034A fails to acknowledge this important information. The following table summarises the information that is provided in TN 034A and compared this with the flows in TA 79/99 taking into account both directions of travel:

Table 2.1: Review of Link Capacity Calculations

Link	TA 79/99			AM Peak			PM Peak		
	Dir 1	Dir 2	2-way	Dir 1	Dir 2	2-way	Dir 1	Dir 2	2-way
A251 to Love Ln	1,300	867	2,167	433	579	1,012	530	711	1,241
Brogdale Rd to The Mall	1,300	867	2,167	811	867	1,678	1,107	852	1,959
B2040 to Brogdale Rd	1,110	740	1,850	733	769	1,502	1,041	855	1,896
Western Link to B2040	1,260	840	2,100	856	854	1,710	1,127	887	2,014
Cellar Hill to Station Rd	1,110	740	1,850	968	799	1,767	899	1,059	1,958
Station Rd to Lynsted Ln	1,110	740	1,850	933	834	1,767	924	1,068	1,992
Lynsted Lane to Frognaal Ln	1,110	740	1,850	923	769	1,692	909	1,046	1,995

Red: Flows exceed TA 79/99 capacity

- 3.15 It can be seen that in both peak hours there are several sections of the A2 where both the non-dominant direction of flow and the total 2-way flow exceed the capacities set out in TA 79/99.
- 3.16 Notwithstanding the review of the figures provided in TN 034A, a review of the information in the TA suggests that the modelled flows are higher than those quoted in TN 034A. The following table uses information from Table 5.1 of the TA:

Table 2.2: Review of A2 Link Flows set out in TA

Link	TA 79/99 Capacity (2-way)	2038 Reference Case		2038 with Development	
		AM Peak	PM Peak	AM Peak	PM Peak
Cellar Hill to Station Rd	1,850	1,576	1,700	1,904	2,146
Station Rd to Lynsted Ln	1,850	1,473	1,518	1,919	1,989
Lynsted Lane to Frognal Ln	1,850	1,473	1,518	1,919	1,989

3.17 It can be seen that in 2038 without development the A2 operates below TA 79/99 theoretical capacity but in 2038 with development the A2 around Teynham is shown to operate above theoretical capacity. **The appellant's own information therefore shows that the proposed development will lead to a severe impact on the A2.**

3.18 This finding is consistent with the calculations that were set out in the original Railton Report (see paras. 5.53 to 5.62 of original Railton report).

Mitigation Proposals

3.19 Section 6 of TN 034A presents a proposed improvement to the Woodstock Road/Bell Road/Gore Court Road/Park Avenue mini-roundabout (Junction 58). This concludes:

'This show [sic] performance comparable and slightly improved over the previous mitigation design, such the [sic] original conclusion of the TA remains unchanged'. (TN 034A, para. 6.2.5)

3.20 It is assumed that the previous mitigation design is that shown in Appendix A of The Transport Assessment Volume 8 – Mitigation Proposals (ref. 16-023-R5007 Rev. D), C&A, January 2024. This layout appears to be unacceptable since it indicates that there are two straight-ahead through lanes on the Woodstock Road and Bell Road approaches despite there being only a single lane exit on all arms. This would lead to vehicle side-swipe collisions or rear-end shunts as drivers braked suddenly to avoid colliding with the adjacent vehicle. The lane markings have been removed from the latest design in TN 034A but there remains concern that the layout will lead to driver confusion and collisions.

3.21 Notwithstanding the highway safety concerns, scrutiny of the proposed improvement reveals that it relies on widening approaches to the mini-roundabout to allow two lanes of traffic at three of the give-way lines. The widening requires large areas of existing footway to become part of the carriageway. Footways on both sides of the northern arm of the junction (Gore Court Road) are particularly affected and it appears that the

remaining footway has a width of less than 2.0m on both sides of the road close to the junction. The junction is embedded in a large residential area and is used by many pedestrians including school children of both primary and secondary age. The narrowing of footways and the provision of an additional lane of traffic on both of the arms of the junction where pedestrian islands are provided (Gore Court Road and Bell Road) will make pedestrian movements more difficult and less safe. The use of the junction by cyclists will also become more difficult and dangerous due to the increased number of lanes and the very limited space within each of those lanes.

- 3.22 The previous submission (January 2024) suggested that drivers would use '*alternative and more suitable routes*' (para. 2.2.5 of C&A, Jan 2024) to access Sittingbourne town centre. For residents in the proposed development, the route along the Woodstock Road corridor would be far more direct and convenient than the route via the A2 to the north (see para. 6.41 of original Railton report). This is particularly the case for those in the proposed Highsted Village part of the development.
- 3.23 The Sustainable Transport Strategy (STS) for the Combined Site identifies the Bell Road corridor as a potential case study for the reallocation of road space (see paras. 9.2.6 to 9.2.11 of Highsted Park TA Vol 5). The Bell Road corridor passes through the Woodstock Road/Bell Road/Gore Court Road/Park Avenue mini-roundabout and this is identified as a potential location for reallocating pedestrian footways to carriageway to increase vehicle capacity.
- 3.24 **The applicant cannot propose both a reallocation of highway space to cars at the Woodstock Road/Bell Road/Gore Court Road/Park Avenue mini-roundabout and, at the same time propose a reallocation of highway space to pedestrians and cyclists. The strategy is contradictory and fundamentally flawed.**

Highsted Park (Combined Site)

- 3.25 KCCHA provided comments on the Land West of Teynham proposals on 26 June 2024. C&A have submitted a response to these comments in a Technical Note dated August 2024 (TN 036A). The following paragraphs assess whether this additional information alters any of the conclusions that were drawn in the original Railton report.

Personal Injury Road Traffic Accidents

- 3.26 Further details of PIAs are provided. The information does not alter any of the conclusions drawn in the original Railton report.

Bus Link between Highsted Road and Swanstree Avenue

- 3.27 Para. 2.1.6 of TN 036A refers to the proposed closure to general traffic of the section of Highsted Road south of Swanstree Avenue to give priority to pedestrians, cyclists and buses. KCCHA does not query the way in which this potential alteration to the highway network has been modelled. The response given by the applicant therefore fails to deal with the concern raised in the original Railton report, that the implications of this closure had not been considered in the modelling work.

Traffic Impact Assessment

- 3.28 Para. 4.1.5 of TN 036A confirms that assessments are incorrectly labelled as 2037 when they have been updated to 2038. This deals with the concern raised in paragraph 7.47, the note under Table 6.1 and paragraph 6.45 of the original Railton report.

Mitigation Proposals

- 3.29 Paragraphs 5.1.10 to 5.1.15 of TN 036A provide commentary on the Ruins Barn Road/Woodstock Road corridor, initially in the context of the proposed signalisation of the Tunstall Road junction but then more generally for the corridor as a whole.
- 3.30 It is suggested that a '*monitor and manage*' approach is adopted in the context of '*subtle interventions such as traffic calming*' (para. 5.1.13). A monitor and manage approach may be appropriate if there is a reasonable prospect of there being measures available that could mitigate the level of adverse impact that is likely to arise as a result of the proposed development. The corridor is already highly sensitive and congested and no significant measures are proposed to restrict vehicles from using the corridor. Indeed, the only proposed closure of existing links to general traffic is the section of Highsted Road south of Swanstree Avenue. **The closure of Highsted Road south of Swanstree Avenue will lead to an *increase* in traffic on the Ruins Barn Road/Woodstock Road corridor.**
- 3.31 The scale of the impact on this corridor is likely to be such that a monitor and manage approach is inappropriate as there are no possible measures that could be implemented that have the capability of mitigating the adverse impacts that are likely to arise as a result of the proposed development.
- 3.32 **For a 'monitor and manage' approach to be acceptable, there needs to be a realistic prospect of implementing measures that would manage adverse impacts. In the absence of credible measures and interventions, a reliance on 'monitor and**

manage' represents an abnegation of the responsibility of the applicant to mitigate impact to an acceptable degree. (see also Section 4 below)

Woodstock Rd/Bell Road/Gore Court Rd/Park Avenue mini-roundabout (Junction 58)

- 3.33 Mitigation at this junction is discussed in relation to the Northern Site (see above). As would be expected, the impact of the Combined Site is shown to be greater than that of the Northern Site alone. The response provided in TN 036A is very similar to that provided in TN 034A. The comments made previously about the unacceptability of the proposed junction layout and the conflict between mitigating vehicle impact while at the same time promoting the corridor for sustainable modes apply equally in this case.

4 REVIEW OF NATIONAL HIGHWAYS RESPONSE

Land West of Teynham

Background

- 4.1 NH provided comments on the Land West of Teynham proposals on 09 June 2024. C&A have submitted a response to these comments in a Technical Note dated July 2024 (TN 035A). The following assess whether this additional information alters any of the conclusions that were drawn in the original Railton report.
- 4.2 A review of the content of TN 035A reveals no additional information that affects the conclusions drawn in the original Railton report.

Highsted Park (Combined Site)

- 4.3 NH provided comments on the Highsted Park proposals on 09 July 2024. Two responses to NH's comments have been submitted. C&A have submitted a response to these comments in a Technical Note dated August 2024 (TN 037A). Montagu Evans has produced a further response (August 2024) that follows a 'workshop meeting' involving the applicant and NH on 20 June 2024. The following paragraphs assess whether this additional information alters any of the conclusions that were drawn in the original Railton report.

C&A Response (TN 037A)

- 4.4 A review of the content of TN 037A reveals no additional information that affects the conclusions drawn in the original Railton report.

Montagu Evans Response (All Matters to be Reserved)

- 4.5 The Montagu Evans response deals primarily with planning matters as they relate to the applicant's submissions on access and transport. Since the proposals for Land West of Teynham (Northern Site) do not include any proposed modifications of the Strategic Road Network (SRN), the Montagu Evans response deals only with the Highsted Park proposals.
- 4.6 The Montagu Evans response seeks to demonstrate that the overall approach to planning; to reserve all matters at this stage, is the correct approach to take by reference to Section 5 of the Town and Country Planning (Development Management Procedure)

(England) Order 2015 (DMPO). Specifically, the argument in support of the adopted approach relies on the fact that Swale Borough Council (SBC) failed to request that access be considered as a detaield matter within 1 month of the application being received as required by the DMPO.

- 4.7 Notwithstanding the DMPO timescale, the key question is whether the proposed approach, leaving access matters to be dealt with by condition, is acceptable. Paragraph 55 of the NPPF sets out the 6 tests that must be satisfied when conditions are imposed:

“Planning conditions should only be imposed where they are:

- 1. necessary;*
- 2. relevant to planning;*
- 3. relevant to the development to be permitted;*
- 4. enforceable;*
- 5. precise and;*
- 6. reasonable in all other respects.”* (NPPF, para. 55)

- 4.8 If access is being treated as a reserved matter then it is necessary for access to be secured through the imposition of planning conditions and these conditions must satisfy the 6 tests.
- 4.9 In order to be able to establish **precise** conditions (5th test), it is necessary to establish the location of unacceptable transport impacts, the extent of those impacts and, in accordance with the 4th test, whether the proposed mitigation being secured though condition, is enforceable (i.e. feasible and deliverable). In the absence of detailed analysis of the expected transport impacts of the proposals, it is not possible to identify conditions that meet the 6 tests.
- 4.10 For example, the Highsted Park development, in particular, is likely to lead to a severe impact on the Ruins Barn Road/Woodstock Road corridor into Sittingbourne. The applicant has proposed some mitigation to this corridor; signalisation of the Tunsatll Road/Ruins Barn Road junction and modifications to the Woodstock Road/Park Avenue mini-roundabout, but neither scheme is shown to be either deliverable or to properly mitigate the impact of the proposed development. The schemes cannot, therefore, be subject to valid conditions. Nor can there be a condition that seeks some other approach that has yet to be determined since this would not be precise.
- 4.11 Further doubt arises because the sustainable transport strategy is both unclear and conflicts with the proposed schemes to increase vehicle capacity. The following are reasons supporting this statement:

- The scheme to increase the vehicle capacity of the Woodstock Road/Park Avenue mini-roundabout is detrimental to both pedestrians and cyclists yet the route through the junction is identified as a primary corridor for sustainable travel;
- The proposed closure of the section of Highsted Road south of Swanstree Avenue to general traffic to prioritise pedestrian, cycle and bus movement will transfer even more traffic onto the Ruins Barn Road/Woodstock Road corridor;
- The section of cycle priority along Ruins Barn Road south of the existing built-up area of Sittingbourne is not shown to connect with any cycle facilities further north and the provision of any such facilities is likely to further exacerbate severe constraints on vehicle movement.

4.12 There is clear evidence that the proposed development, without mitigation, will lead to severe adverse impacts on the Ruins Barn Road/Woodstock Road corridor. It has not been demonstrated that necessary mitigation can be delivered despite the technical work that has been undertaken. Indeed, the work that is available serves to confirm the absence of any enforceable measures that could make the development acceptable. It is not, therefore, reasonable to plead the case that an acceptable solution will be available and can be secured through condition.

5 COMMENT ON POLICY UPDATE

- 5.1 Paragraph 4.50 of the Planning Statement Addendum refers to the NPPF 2024 Consultation and specifically, in relation to transport matters:

*'Paragraph 112: that in assessing applications for development, a **vision led** approach to promoting sustainable transport modes is taken, taking account of the type of development and its location'. (Planning Statement Addendum, para. 4.50) (emphasis added)*

- 5.2 The Planning Statement Addendum does not expand on this matter but references in other documents such as TN 036A to the 'monitor and manage' approach (see above) might be considered to be in accordance with the draft new wording of the NPPF. This would not, however, be justifiable.
- 5.3 The draft NPPF does not provide a definition of 'vision led'. There is a danger that *vision led* could be interpreted as a removal of the responsibility of the highways professional to cater for increased traffic levels. The argument underpinning ideas such as *vision led*, *monitor and manage*, *vision and validate* and *decide and provide* is that an assumption of continual background traffic growth can lead to the continual provision of additional highway capacity that itself generates additional traffic and establishes a vicious circle of growth and network capacity enhancement.
- 5.4 It is possible to successfully implement the principles of *decide and provide* if a development is designed specifically to favour sustainable modes. This could involve the provision of direct, safe, high quality and convenient pedestrian routes between residential areas and major trip attractors, the provision of direct, high quality, segregated cycle routes, the design of bus routes and bus priority within easy walking distance of everyone that provide significant journey time advantages over travel by private car, the design of roads that do not sever communities or provide unrestricted access for all drivers and other supporting measures such as parking constraint.
- 5.5 The proposed development is far from any such 'vision led' design. Walking is made difficult because land uses are widely separated and the SSRR forms a major barrier to movement. Cycling is made difficult both because of the presence of the SSRR and because of the lack of safe and convenient routes into Sittingbourne. Bus accessibility is clearly an 'afterthought' as several convoluted routes have been overlain of a road network designed primarily to maximise vehicle capacity and facilitate movement to and from the wider strategic highway network. Driving private cars would be almost entirely

unconstrained. Where driver delays are likely to be maximised (e.g. along the Ruins Barn Road/Woodstock Road corridor), there are no high quality corridors available for sustainable modes. Indeed, the work that has been done shows that the need to provide additional vehicle capacity to avoid unacceptable delays, fundamentally conflicts with the use of the available routes by sustainable modes.

- 5.6 In this context it is impossible to argue that the proposed development could conceivably be viewed as the type of development where a vision led approach would be acceptable. As has been clearly described in the original Railton report, the proposed development is car-dependent.
- 5.7 It would be hypocritical to argue a 'vision led' approach in the context of the proposed development since the underlying principle of the vision led approach is that additional highway capacity leads to increased driver demand. Despite this, there has been no consideration given the additional traffic that will be induced by the provision of the SNRR, the SSRR and the proposed new motorway junction (see paras. 2.30 and 2.31 of original Railton report). There is no 'vision' that could counteract the traffic generating effects of providing this magnitude of new highway capacity.

6 CONCLUSIONS (UPDATED)

- 6.1 The Executive Summary that accompanied the original Railton report has been reviewed in light of the additional information submitted in response to comments from KCCHA and NH. The Executive Summary is reproduced below.

Green confirms that the matter has not altered in light of the additional information.

Red indicates that additional information relating to the matter alters the conclusions previously drawn in the Railton report.

Executive Summary

Introduction

- i. The report has been prepared on behalf of Teynham, Doddington, Lynsted with Kingsdown and Tonge Parish Councils by Bruce Bamber, Director of Railton TPC Ltd. The author has over 30 years' experience of working within the transport planning industry including acting as an expert witness in numerous public inquiries. He has considerable experience of working within the local area, has visited the site and met with representatives of local communities who have explained their concerns and provided details of existing transport conditions. **Unchanged**
- ii. The proposed development comprises up to 8,400 new dwellings and other land uses. The applicant calculates the development generating, in the peak hours, between 5,445 and 5,881 vehicle trips on the highway network outside the proposed development. This would equate to around 75,000 daily vehicle trips. This figure excludes induced traffic and the effects of traffic re-routing as a result of new highway infrastructure. The new trips (and induced and re-routed traffic) lead to impacts on the M2, the A2, distributor roads and many local roads in the area. **Unchanged**
- iii. The report deals with both the Combined Site (8,400 dwellings on Land South and East of Sittingbourne plus on Land West of Teynham) and the Northern Site (1,250 dwellings on Land West of Teynham) in isolation. **Unchanged**
- iv. The key findings are summarised below. The body of the report provides the analysis and evidence from which the conclusions are drawn. **Unchanged**

Sustainable Travel Deterred by the Physical Layout of Development

- v. The dispersed nature of the proposed development and its distance from facilities within Sittingbourne undermine opportunities for sustainable travel. **Unchanged**

Barriers to Movement on Foot and by Bicycle

- vi. The proposed Sittingbourne Southern Relief Road (SSRR) constitutes a significant barrier to movement by sustainable modes both for existing residents and for those living within the proposed development. The severance effect of the SSRR is the inevitable consequence of the necessity to provide a high standard, high speed road to justify the proposed provision of a new motorway junction. The SSRR's adverse severance impacts are ignored in the Environmental Statement (ES). **Unchanged**

- vii. The A2 and the proposed A2 junction serving development to the north and south constitute further barriers to sustainable movement. This is a particular problem for those to the south of the A2 seeking to access Teynham railway station and those to the north of the A2 seeking to access facilities to the south, including the proposed secondary school. **Unchanged. It appears that the revised Masterplan provides less information about the A2 roundabout junction that sits between the northern and southern sites than the original submissions.**
- viii. Most junctions along the SSRR are proposed to be large roundabouts. These are dangerous and threatening to cyclists and are difficult for pedestrians to cross due to the width of roundabout entries and exits and the speed of traffic. **Unchanged**
- ix. The proposed 'green bridge' across the SSRR is a misnomer since it is merely a widened overbridge that forms part of a larger junction designed primarily to provide high vehicle capacity. **Unchanged**
- x. It appears that the SSRR will sever a number of public rights of way that currently provide links between Sittingbourne and settlements to the south. **Unchanged**

Poor Bus Provision

- xi. The form of the proposed development does not lend itself to an efficient and convenient bus access strategy. It is likely that after initial bus subsidies are consumed, few services would remain commercially viable. **Unchanged**
- xii. The only proposed bus priority appears to offer negligible benefit in terms of reduced journey times compared with travel by private car. **Unchanged**

Poor Access to Rail Services

- xiii. Access to rail services is poor. Teynham railway station has poor pedestrian access, very limited cycle parking, no drop-off or pick-up facilities for either cars or buses and offers only one stopping service in each direction for most of the day. **Unchanged**

Failure to Consider Induced Traffic

- xiv. Research, evidence and guidance show that the provision of significant new highway capacity, in this instance, in the form of the SSRR, the Sittingbourne Northern Relief Road (SNRR) and a new motorway junction will lead to additional induced traffic. This effect has been ignored in the transport supporting work. **Unchanged**

Failure to Engage with Important Transport Issues

- xv. The applicant has responded to numerous concerns raised by the Highway Authority by suggesting that they would be overcome at later stages of the planning process. The refusal to demonstrate, at this stage, an acceptable access strategy is a serious concern since a development of this scale has the potential to lead to severe adverse transport effects that cannot be mitigated. **Unchanged**

Failure to Consider Poor Safety Record on Lower Road, Teynham

- xvi. No consideration has been given to the very poor safety record on Lower Road, Teynham. Both the proposals have the potential to significantly worsen this problem. **Unchanged**

Sensitivity of Lower Road and A2 Under-Estimated

- xvii. The applicant's assessment of transport environmental impacts has under-estimated the sensitivity of Lower Road and the A2 through Teynham and further east and has thus under-estimated the predicted significance of the adverse impacts resulting from the proposals. **Unchanged**

Failure to Mitigate Increased HGV Movements on the A2

- xviii. The assessments predict a significant increase in HGV movements on the A2 through Teynham and further east. For the Northern Site the increase is predicted to be 707 new HGV movements per day (+56%) and for the Combined Site the increase is predicted to be 1,355 new HGV movements per day (+109%). Despite these substantial increases, no mitigation is proposed to reduce the associated adverse transport impacts. **Unchanged**
- xix. Increased HGV movements will not only lead to increased fear and intimidation but also have adverse impacts in terms of noise, vibration and air quality. **Unchanged**

Failure to Acknowledge or Assess Severe Congestion on the A2 through Teynham and Elsewhere

- xx. The A2 through Teynham is predicted to carry traffic flows that will lead to very severe congestion. The Northern Site is predicted to generate around 5,000 additional daily vehicle trips on the A2 through Teynham and the Combined Site is predicted to generate around 2,800 additional daily trips. New traffic associated with the Northern Site alone will cause the A2 to exceed its capacity. The assessment work for the Combined Site indicates that the A2 would be operating far in excess of its capacity even before development traffic is added. **Unchanged. Additional information has been submitted to compare predicted traffic flows with theoretical link capacities but this work only confirms that the A2 will exceed its theoretical maximum capacity at peak times.**

Severe Impact on the Ruins Barn Road/Woodstock Road Corridor

- xxi. The Combined Site is shown to lead to an extremely severe impact on the Ruins Barn Road/Woodstock Road corridor into Sittingbourne. **Unchanged. Additional information is submitted clarifying a proposed improvement of the Woodstock Rd/Bell Road/Gore Court Rd/Park Avenue mini-roundabout (Junction 58). This, however, confirms that the improvement is not safe and represents a barrier to movement on foot and by bicycle, contrary to the applicant's aspiration for the route to be a sustainable travel corridor.**

Potential for Rat-Running

- xxii. In relation to the Combined Site, the predicted severe delays for traffic to and from Sittingbourne via the Ruins Barn Road/Woodstock Road corridor are likely to encourage rat-running through other sensitive areas such as Borden village. **Unchanged**
- xxiii. Both proposals have the potential to increase rat-running along Lower Road because of increased delays along the A2. **Unchanged**

Summary of Impacts of the Northern Site Alone

- xxiv. The Northern Site, if developed in isolation, will lead to significant increases in rat-running traffic on Lower Road, worsening an already poor safety record. It will also lead to significant increases in traffic on the A2 through Teynham (including 707 HGV movements per day), causing severe delays. The level of increased traffic on the A2 is almost double that resulting from the Combined Site. Although Teynham has a railway station, access on foot, by bicycle, by bus and by car is, and is likely to remain, poor. **Unchanged**

Errors, Omissions and Contradictions

- xxv. The transport supporting work contains numerous errors, omissions and contradictions that would need to be corrected or clarified before the applications could be considered. Details of these and further evidence supporting the issues described above are summarised in the report. **Mostly unchanged. The applicant has confirmed that some junction operational assessments were incorrectly labelled as 2037 when they had been updated to 2038. This deals with the concern raised in paragraph 7.47, the note under Table 6.1 and paragraph 6.45 of the original Railton report.**

Requirement to Deal with Access as a Detailed Matter

- xxvi. **The applicant continues to seek to justify the approach that has been taken to planning whereby all matters, including access, are reserved. This Addendum provides evidence (Section 4) to show that conditions that seek to make the proposed development acceptable in transport and highways terms cannot meet the six tests, set out in the National Planning Policy Framework (NPPF), that must be satisfied when conditions are imposed. Access should not, therefore, be dealt with as a reserved matter.**