

SAVE CAPEL

ADDITIONAL STATEMENT IN RESPONSE TO NEW TRANSPORT EVIDENCE REGARDING MATTER 6

Introduction and summary

1. Save Capel (“SC”) included in its statement on Matter 6 that an additional transport addendum had been provided by TWBC¹. This document was highlighted by our transport consultants (Motion) as being referred to in the SoCG between KCC and TWBC².
2. Motion did not have the opportunity to review this (earlier) transport addendum prior to SC meeting the filing deadline of 11th May 2022. Motion have now reviewed that report.
3. Whilst SC continues to rely on its now published position statements on Matter 6, it believes that this earlier transport addendum is relevant to consideration of the audit trail of modelling work conducted by TWBC.
4. SC does not believe it to be appropriate for it to introduce this report to the examination and TWBC have stated “*the Council will not be requesting agreement from the Planning Inspector that it is uploaded to the website as an Examination Post-Submission Evidence Base Document because it has been superseded by the Local Plan – Transport Assessment Addendum 2 report (October 2021)*”.
5. SC accepts the modelling has been superseded and no doubt TWBC will argue that it represents ‘improvement’ of the evidence base. However, this statement sets out our concerns as assessed by Motion who note that AS and AS2 are both relied on in the SoCG with KCC³. They have identified fundamental differences between the assessment work presented in AS compared to AS2 which need to be clarified: AS2 is not just an iterative redraft of a technical note because the assessment inputs and assessment results are different.

¹ REP-1233098-007 (at para 69)

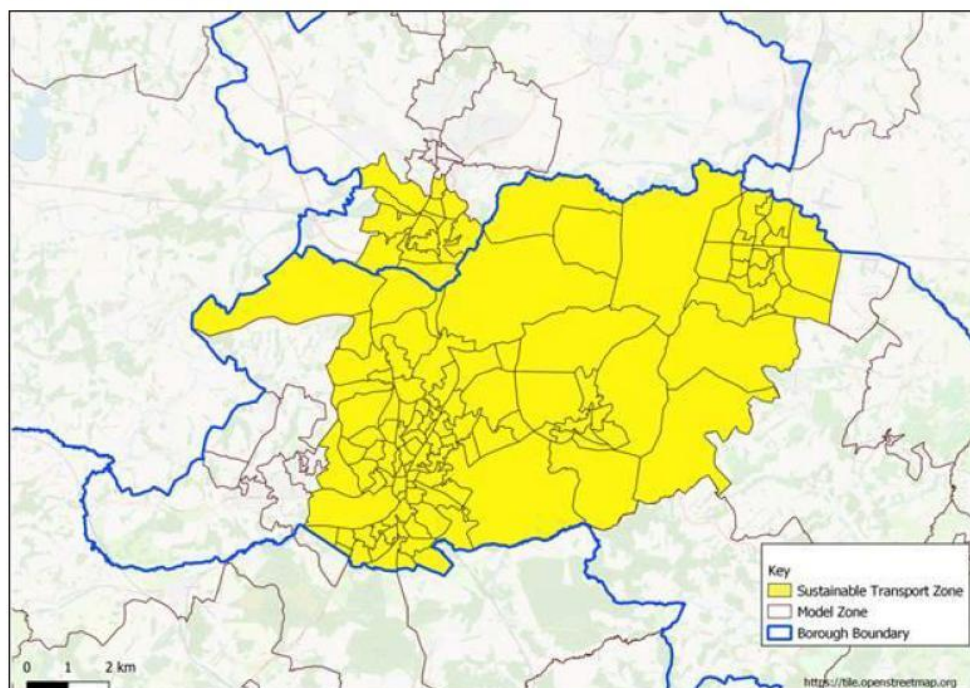
² PS_025. Save Capel considers that the admission of this new evidence so late in the process (at the hearing on 29th March 2022) is entirely unsatisfactory..

³ PS_025 at para 3.12 to 3.14

Comparison of Addendum report (“AS”) with Addendum report 2 (“AS2”)⁴

6. Both AS and AS2 claim to represent additional work asked for by KCC where AS2 addresses no reduction in trip rates from existing residents of Paddock Wood as a result of mitigation measures and inclusion of mitigation measures for consented schemes in the base case scenario.
7. However, this does not explain why there are fundamental differences in AS and AS2 with there being fewer car journeys in the AS2 model which is assumed to be why there is a difference in the junction models. Notwithstanding this, whilst the junction modelling results for 2031 are the same in both reports, the summary tables of 2038 junction assessments have different results between AS and AS2. This indicates that any changes in the transport environment tested in AS2 only commence post-2031 otherwise the junction assessment summary results for the 2031 assessment year would differ between AS and AS2 as they do for the 2038 assessment year. These post-2031 changes have materially changed the modelling results and need to be explained.
8. AS2 has added the inclusion of Tonbridge as being in the sustainable transport zone. This is despite TWBC failing to identify i) why it was omitted from AS, and ii) what is actually proposed in Tonbridge.

Figure 2-3 – Sustainable Transport Zone



⁴ AS2 has been submitted to the examination as PS_023

Moreover, AS refers to the implementation of an area wide travel plan for Tonbridge so there is no difference in the mitigation proposed. The effect of including it is to reduce the volume of traffic impacting on Tonbridge which may explain the differences in the matrix totals. It is entirely unclear why the inclusion of Tonbridge into the sustainable travel zone has resulted in car journeys being taken out of the model and why a discount seems to have been applied to car journeys within this zone.

9. Critically, AS includes a table of journey times for key corridors which shows significant problems for the A26 in Tonbridge. For example, journey times are expected to increase from 378 seconds northbound (AM peak) to 849 seconds under the local plan scenario. This table is removed from AS2.
10. AS also refers to mitigation investment of £35 million in the masterplans of the strategic sites at Tudeley and Paddock Wood (equating to £260 per head). However, this is altered to £50 million in AS2 (£370 per head). SC has been unable to find a supporting breakdown of these numbers and it is unclear whether this an error nor if there is an impact on the viability assessments.
11. In addition, it is not clear why some of the works identified in AS seem to have disappeared in AS2 and the peak total modelled highway trips are lower in AS2.

Conclusion

12. The differences between AS and AS2 are more than cosmetic, inter alia, for the reasons set out above. There has been some rewording of elements between AS and AS2 which makes no material difference to the outcomes. However, the numerical discrepancies are stark.
13. There is information on route journey times in AS which have not been included in AS2, but which are extremely important when considering the impacts on Tonbridge and Malling. According to the SoCG this information will have assisted in TWBC and KCC reaching common ground. However, it is clear that TMBC were not involved in the preparation and assessment of this modelling and TWBC has failed to meet its duties under paragraph 106(b) of the NPPF.
14. SC does not wish to delay the examination with further evidence submission from the Council, but we now have at least four different modelling assessments, including those at Reg19, and it is clear that TWBC have sought to rush the transport evidence (reports in Sep/Oct) prior to

submission. Even then, KCC were still not satisfied with the evidence and further junction modelling was carried out which was not published⁵ until 29 March 2022.

15. This affirms our position that the transport evidence neither supports nor justifies the Local Plan in terms of soundness at the point of submission and it has not been subject to public consultation through a Reg19 process.

SAVE CAPEL

06 JUNE 2022



⁵ PS_024