

27 June 2024

**HEARING STATEMENT FROM BRENCHLEY AND MATFIELD PARISH
COUNCIL
FOR LOCAL PLAN STAGE 3 HEARINGS**

New Strategic Transport Assessment Modelling Appraisal - Appendix 1

- A new Strategic Transport Assessment Modelling Appraisal (new STA) has been published as Appendix 1 to TWBC's Hearing Statement on Tudeley Village. This is not a place where any member of the public in Brenchley and Matfield (B and M) would expect to find such an important document, with such major implications for our parish. The Parish Council only became aware of it when a parish councillor listened to the online broadcast of the Tudeley session. Brenchley and Matfield Parish Council (BMPC) therefore has had very little time to study the document and to assess its implications. Moreover, because of the faintness of the background mapping, it is difficult to be sure which roads some of the traffic flows refer to. BMPC requests permission to send in further comments if necessary.
- The new STA identifies 3 junctions which seriously affect Brenchley and Matfield parish that will remain major hotspots despite the high forecast modal shift of 9% (the Stage 3 Modal Shift Impact reporting, PS049, also considered a low modal shift of 4%, but this does not seem to have been modelled in the new STA. Note that PS 053 Provisions for sustainable and active travel, dated November 2023, stated at paragraph 7.7 that as regards the inter-urban sustainable transport proposals "the earlier 10% reduction from these measures alone is, on reflection, considered optimistic; a more realistic 5% reduction is regarded as more appropriate.). These junctions are:

Junction 14 - A228/Alders Road/ Crittenden Road (this junction just outside the parish boundary has major implications for traffic in the parish because much of Crittenden Road is within Brenchley and Matfield (B & M) parish, as are the lanes that could be used as rat runs to avoid it)

Junction 35 – A21/B2160 Kippings Cross

Junction 107 – B2160/Chestnut Lane/Brenchley Road, the crossroads in Matfield village. As well as suffering from congestion and overcapacity, this is a hazardous crossroads with particularly poor visibility from the Crittenden Road arm. A schoolboy recently suffered serious head injuries when hit by a car while crossing the road near this crossroads. This is also an area of parking stress (PS 069, B and M Neighbourhood Development Plan, paragraph 6.137 and Figure 31).

- PS 049 Modal Shift Impact Reporting also noted (p12) that when comparing the Local Plan High Modal Shift scenario with the Reference Case scenario, notable increases are forecast at the following locations:

Foxhole Lane (Pembury): much of Foxhole Lane is in B & M parish so presumably this will also affect the B & M section (the underlying mapping on the accompanying diagram is illegible so it is impossible to tell)

Brenchley Road (and presumably Brenchley High Street)

Links at Horsmonden: much of the traffic coming to and from Horsmonden (which itself is also growing by 230-290 dwellings plus windfalls) and beyond will also affect lanes in B & M parish, which are also already being affected by the increasing traffic resulting from the major developments taking place at Marden in Maidstone district.

PS 049 goes on to say that this suggests the need for wider traffic management measures to ensure any additional traffic generated is primarily directed on to the strategic road network. However, no such management measures appear to be proposed by TWBC or KCC in the new STA or elsewhere. Without such measures, the historic routeways in B & M parish that are an important feature of the High Weald National Landscape will be seriously damaged by the weight of traffic, as will the lives of residents living alongside them.

- No mention at all is made of the Pixot Hill/Windmill Hill/Blind Lane/Brenchley High Street route that is an obvious route towards the A21 for anyone living in the extensive new housing for which there are already planning applications on the eastern side of Paddock Wood. It is not clear whether the effect of all this new housing on these roads has been assessed at all. The Pixot Hill/Windmill Hill/Blind Lane/Crook Road crossroads is a particularly hazardous one owing to very poor visibility.
- The new STA also proposes to make no changes to control congestion at either of the major hotspot junctions within B & M parish, on the grounds that the combined effect of the Colts Hill Bypass, Badsell Roundabout and Pembury Road Corridor improvements “will have the potential” to divert traffic away from the B2160. However,
- The Pembury Road Corridor improvements, for which a 10% uplift in capacity is assumed, appear to be at a very early stage, with optioneering still underway and no model having yet been run to test effectiveness (new STA p38);
- BMPC finds it difficult to understand the logic that funnelling more traffic to the A228 to improve the Kippings Cross roundabout congestion will allow the “dumbbell roundabouts” at Pembury to become minor hotspots rather than the major hotspots they are now. Traffic at these roundabouts already tails back causing queues on the A21 during the am and pm peaks with obvious potential to cause accidents.
- The Pembury Road is not necessarily the main destination for traffic using the B2160, much of which will be heading to Sevenoaks or the M25 and beyond. Unless positive measures are taken to discourage its use, such as traffic calming, traffic lights at Matfield crossroads, a formal pedestrian crossing in Matfield, and speed limit reductions on the current 50mph sections of the B2160, the B2160 will remain the most direct and obvious route for traffic from Paddock Wood town centre and the eastern part of Paddock Wood to the A21. The A228 route has traffic lights at the crossroads with the Tonbridge Road and Pembury High Street, whereas the B2160 route has no traffic lights, which is likely to lead to drivers preferring it as the route to Tunbridge Wells.
- The improvements to capacity on the Pembury Road (assuming it turns out that they can be realised) will equally benefit traffic accessing them via the B2160, Kippings Cross and the A21, so there will be no incentive to use the A228 instead.

Junction 14 - A228/Alders Road/ Crittenden Road will be altered in connection with the Colts Hill bypass and therefore no additional mitigation has been considered for this junction.

- As regards road safety at the Kippings Cross collision hotspot, BMPC remains to be convinced that the proposal to add “queues likely” warning signs on the A21 western arm at Kippings Cross would make a significant difference.
- On page 48 of the new STA the Kippings Cross pm A21 W peak figure for 2024 does not accord with local residents’ experience. Traffic queues already regularly stretch back almost to the Pembury Bo-Peep turn-off, leading to local and some longer distance sat-nav traffic diverting onto completely unsuitable narrow, winding, historic rural lanes in Pembury and B and M parishes. The problem occurs year-round but is particularly acute on Friday afternoons in Summer when traffic is heading to the coast. As well as having a damaging effect on quality of life for residents on these

lanes, failure to address this problem is contrary to the newly enhanced duty on public bodies to further the purpose of conserving the High Weald National Landscape. On page 47 the Kippings Cross am A21 E peak figure is shown as already over capacity with the growth in the Plan that has already taken place, and on page 49 the am B2160 approach to Kippings Cross is also estimated as being reached in 2029 p49. Even if the proposed mitigations will ultimately be effective, what is the realistic likelihood of their being completed by 2029?

Examiner's Stage 3 questions

Matter 4, Paddock Wood

Issue 4, Highways Infrastructure

Q1. What effect would the suggested deletion of the Five Oak Green Bypass have on the distribution of traffic across the highway network? Does the growth around Paddock Wood require additional highways mitigation not previously identified?

Yes, as well as the mitigation at Kippings Cross roundabout which now appears to be going to be abandoned but which is still necessary (see paragraph 5 above), the growth around Paddock Wood requires a number of additional mitigation measures on the B2160, to alleviate its effects on Matfield and Brenchley parish. Measures required are downgrading of the B2160 from its B road status, traffic lights at junction 107 Matfield Crossroads, traffic calming in the village (though KCC have advised that this is not possible this on account of its being a narrow B road), and a reduction of the speed limits on the 50mph sections to 40mph. Only if this road is made markedly slower than the B2017 Badsell Road/A228 Colts Hill route will the traffic from the Paddock Wood developments be diverted to TWBC's preferred route. It would also enable residents to cross the road safely, which is already difficult at present and will become much more so unless action is taken to reduce traffic speeds and volumes.

Q2. Is the Colts Hill Bypass required as a result of the growth proposed around Paddock Wood? How will it be funded and delivered?

Yes, it is clearly required. Colts Hill is already over capacity and crashes are frequent on it. If it is not improved, even more traffic will be decanted onto the B2016 through Matfield. BMPC does, however, have real concerns as to whether the proposed bypass will be funded, constructed and ready for use in time to prevent serious problems at the Kippings Cross roundabout and Matfield crossroads, given that there are already two major hybrid planning applications under consideration for the east side of Paddock Wood. BMPC also notes that only half of the Colts Hill bypass is proposed under this Plan, which will still leave a narrow unimproved section to the south of the new road. This will undoubtedly limit its attractiveness as an alternative to the B2160 through Matfield.

Q3. What effect will the proposed Colts Hill Bypass have on the setting of the High Weald AONB, landscape character and heritage assets? How have these factors been considered as part of the preparation of the Plan?

No comment

Q4. What is the justification for suggesting the removal of the Five Oak Green Bypass from the Plan, but not the Colts Hill Bypass?

Please see Q2 above.

Q5. In what ways does the evidence base rely on modal shift when considering likely future impacts on the highway network? Is the Plan justified by appropriate supporting evidence?

The evidence base relies strongly on a high modal shift (see paragraph 2 above). It is not clear why the 9% figure has been chosen instead of the 4% figure. While this degree of modal shift may perhaps be true for travel within Paddock Wood and East Capel, BMPC remains to be convinced that this modal shift will in fact occur in relation to traffic to and from the developments at Paddock Wood on the B2160 and surrounding rural lanes. The funding and timing of the proposed sustainable travel measures are also questionable.

Cycle route

The northern end of the proposed cycle route from Paddock Wood to Tunbridge Wells, which

would be assumed to take some of the motor traffic that would otherwise use the B2160, would be constructed as an element of the Colts Hill half-bypass (see Q2 above). The northern end would use Half Moon Lane to connect to the A21 cycle route. This is a narrow, winding lane shared with motor traffic coming off or going to the A21. It is not in our view a route that the majority of cyclists will feel safe using. There appear to be no firm plans to compulsorily purchase the necessary land to provide the central off-road section. The estimated costs in the infrastructure delivery plan appear optimistic.

Bus service

BMPC raised concerns in connection with the Tunbridge Wells Bus Study about proposed changes to bus services through Matfield and received the following reply from KCC via our County Councillor in February 2024:

“The changes outlined below are aspirations in respect to TW local plan and in the current climate, where bus services are de-regulated, there is no mechanism to force Arriva to make changes. My team have inputted our position to TW. Clearly if Arriva, following the publication of the local plan, saw this as an opportunity and made changes, then we KCC we need to review the impact on the network”.

The following response was also received from Mr Hone at TWBC:

“The Study sets out a number of options for a network of improved bus services that would support the proposed growth in the plan and assesses the feasibility of these. The network options 1-5 are not proposals at this stage, and any detailed proposals for new or changed routes would come forward as part of future planning applications.

“These are all seen as enhancements to the network rather than reductions, and any changes would be discussed with developers, bus operators and Parish & Town Councils at that time.

“The intention is to support and improve bus services rather than leave parts of the borough less well served than currently, and this includes Brenchley and Matfield”.

While this is reassuring as regards proposed changes affecting Matfield, neither of these responses provides any certainty that the proposed improved frequency of buses from Paddock Wood through Matfield to Tunbridge Wells will actually materialise. KCC presently subsidises the Kent bus network by about £8m a year and is approaching insolvency, with bus subsidies already being cut. KCC clearly cannot be relied on to provide any additional funding for the bus improvements proposed in this Local Plan. Funding for bus services should be guaranteed prior to development if modal shift is to be assumed.

Q6. Is it sufficiently clear to users of the Plan what strategic highways improvements will be needed as a result of the growth proposed around Paddock Wood, where and when? Is the Plan (as suggested to be modified) justified and effective in this regard?

No, for the reasons given above.

Matter 7, Highways Infrastructure

Issue 1 – Strategic and Local Road Networks

Q1. Without the proposed bypass, what effect will the suggested changes to the Plan have on the B0217 through Five Oak Green? What mitigation measures will be necessary in this location and how will they be achieved?

No comment

Q2. What effect will the suggested changes to the Plan have at Kippings Cross (A21/B2160)? Do the conclusions and recommendations in the Kippings Cross Junction – Local Plan Mitigation Option Analysis (PS033) remain relevant?

No, it appears that PS033 has been overtaken and replaced by the new STA. However, while BMPC is pleased to see that the idea of narrowing the B2160 arm of the junction has been dropped, for reasons given at paragraphs 5,6 and 7 above and our answers to questions on Matter 4 Paddock Wood, BMPC believes that the options described as KX 10 and KX 11 as described on page 37 of the new STA need to be subject to further analysis with a view to implementing one of them as soon as possible.

Q3. What effect will the proposed changes to the Plan and distribution of growth have

on the remaining “hotspots” identified in the evidence base? Will there be any unacceptable impacts on highway safety or will the residual cumulative impacts on the road network be severe as a result of the Plan?

The new STA is presumably designed to answer these questions. However, for reasons given above BMPC believes that the measures proposed in the new STA will be insufficient to prevent unacceptable impacts on highway safety or severe residual cumulative impacts on the road network in our parish.

Q4. Where mitigation is required, can any significant impacts on the transport network (in terms of capacity and congestion), or on highway safety, be cost effectively mitigated to an acceptable degree?

Effective and timely mitigation is essential and cost should be a secondary consideration.

Issue 2 – Policy Requirements

Q1. Where mitigation is required, is the Plan sufficiently clear what is required, where and when? Is the Plan effective in this regard?

No, for the reasons given above it is not clear that necessary and timely mitigation will take place as regards roads and junctions in B and M parish.

Q2. Have the costs associated with the necessary highways infrastructure been tested and will it be viable?

This is primarily for TWBC to answer. However, it appears to BMPC that the costs of the proposed highway and cycle way infrastructure described in the new STA may have been underestimated, possibly significantly so, and furthermore that, as described above, other highway infrastructure that is not proposed in the new STA is also necessary. Judging by PS 061a-d addendums to the viability assessment, viability may be a problem and hence whether the proposed sustainable transport and highway infrastructure improvements will materialise may be uncertain. Paragraph 3.1.1 of PS 061a addendum to the viability assessment points out that “at this stage, the ability of TWBC and the developer parties to adapt the details of delivery at various points throughout its long timeline if / as may be appropriate”. Such adaptation could presumably include reduced contributions to highway infrastructure or sustainable transport that could cause some of the predicted modal shift, junction improvements and even the Colts Hill half-bypass to fail to materialise.

Chantal Brooks

Clerk

For and on behalf of Brenchley and Matfield Parish Council