

Tonbridge and Malling Borough Council

LOCAL DEVELOPMENT FRAMEWORK

TONBRIDGE CENTRAL AREA ACTION PLAN

RESPONSE STATEMENT No TON 02

Tonbridge Central Area

Transport-related Issues

Hadlow Road Neighbourhood Group – Matter 02/57/1
Highways Agency – Matter 02/69/1/WR
Tonbridge and District Railway Travellers' Association – Matter 02/55/1/WR
Tonbridge Civic Society – matter 02/101/1/WR
Paul and Kate Mitchell – Matter 02/314/1/WR
Mr Bartam – Matter 02/315/1-5/WR
Mr P J Freeman – Matter 02/317/1/WR
Mr Guy Harrison – Matter 02/318/1/WR
Mr Rutland – Matter 02/328/1/WR

Tonbridge and Malling Local Development Framework

Response Statement No TON 02

Transport-Related Issues

1 Introduction

- 1.1 This Response Statement has been prepared on behalf of the Borough Council by Kent County Council as local Highway Authority, with assistance from Jacobs. It deals first in detail with the submission from the Hadlow Road Neighbourhood Group (HRNG). This is the only further submission received from those intending to appear at the Public Examination.
- 1.2 The Response Statement then goes on to respond to those who have amplified their original Written Representations. In many cases the issues raised are the same as those raised by the HRNG and where this is the case a cross-reference is made. Together with Position Statement TON02, this Statement is also aimed at addressing the matters raised by the Inspector. **Annex A** to this Statement summarises where the Inspector can find the answers to the questions she poses.

2 Response to the Hadlow Road Neighbourhood Group Submission [57]

- 2.1 The Hadlow Road Neighbourhood Group (HRNG) is of the view that the proposals of the AAP have been built upon wholly unrealistic assumptions about traffic growth on the highway network in the town.

Background Traffic Growth

- 2.2 Sir Rod Eddington was jointly commissioned by the Chancellor of the Exchequer and the Secretary of State for Transport to examine the long-term links between transport and the UK's economic productivity, growth and stability, within the context of the Government's broader commitment to sustainable development. The Hadlow Road Neighbourhood Group makes reference to 20% growth in annual traffic projected between 2003 and 2015 in England in this study.¹ This is for a slightly longer period than 2006-2016, is a national average and includes within it assumptions about traffic growth traffic generated by new development and population growth across the UK. This is, in effect, a UK average baseline scenario if we continue as we have been doing in terms of action on sustainable transport.
- 2.3 As explained in *Technical Note on Trip Generation, Distribution and Assignment (Chapter 2)*, traffic forecasts have been based on the DfT's NRTF (1997 base) – the most current available for different road types, with factors applied to the NRTF from TEMPRO in line with good practice. The TEMPRO Guidance confirms that there is likely to be a good case to reduce the background traffic growth applied when all new development trips are explicitly modelled in addition.

¹ RD 1.27 - *Eddington Study Annex C – Transport Demand to 2025 and the economic case for road pricing and investment, Table 5.1, p.85.* - Department for Transport (2006)

“Where a particular development proposal is likely to have a significant impact on demand for transport on one of the roads or rail services where transport measures are being considered, this should be allowed for by explicit modelling of trips associated with that development. (Methods adopted for doing this need where possible to be consistent with those set out in the Transport Assessment for the development. It is important to ensure that modal split assumptions are realistic in the context of current planning policy guidance). The growth factors applied to non-development trips may then have to be adjusted downwards, to avoid double-counting of trips within the model.”²

“Similarly, the correction of growth rates to avoid double-counting should be informed by a view as to the plausible overall population, household or employment growth in the zone, not by a local argument as to whether or not the development can be seen as “additional” in terms of the derivation of the TEMPRO figures.”³

- 2.4 The transport assessment of the Tonbridge Central Area Action Plan (TCAAP) already includes a calculated trip generation from each of the significant developments predicted to occur in the central Tonbridge area, and in these circumstances it would clearly be double counting to apply the full TEMPRO growth to background traffic. The *TEMPRO Guidance Note* provides a worked example whereby the applicable TEMPRO growth factor is reduced because the assessment is incorporating a sizeable development that is incorporated in the TEMPRO growth assumptions.⁴ Given that the work on the TCAAP includes all known developments it follows that if a further background growth factor is applied it should be low, hence the decision to reduce the background growth factor to 25% of the unconstrained level.
- 2.5 Reference to the unconstrained TEMPRO growth factors for different areas of the UK (before their application to NRTF) suggests that traffic growth for Tonbridge is expected to be lower than other areas, as shown by these statistics for 2006 to 2016:

Comparison of unconstrained TEMPRO Growth factors for Tonbridge, Kent, South East England and Great Britain

Geographical Area	Average of Productions and Attractions		
	AM (0700-1000)	PM (1600-1900)	Average Day
Great Britain	1.0956	1.0941	1.0963
GOSE region	1.1131	1.1101	1.1105
Kent	1.1032	1.1068	1.1080
TMBC	1.0746	1.0838	1.0815
Tonbridge Urban area	1.0796	1.0866	1.0858

² RD 1.26 - *Tempro Guidance note – April 2006* – para 4.35, p.24. Department for Transport (2006)

³ RD 1.26 - *Tempro Guidance note – April 2006* – para 4.37, pp.24-25 - Department for Transport (2006)

⁴ RD 1.26 - *Tempro Guidance note – April 2006* - See worked example on Saffron Walden, p.26. - Department for Transport (2006)

- 2.6 It is noted that the forecasts provided as evidence to the Eddington study do not give ranges for different horizon years, time periods or road type. It is also noted that the primary function of the A26 Hadlow Road is to bring traffic into Tonbridge rather than act as a through route. It is already the County Council's policy to route strategic traffic from the M20 to the A21 and Tunbridge Wells via the A228. Previous work on the *Tonbridge Urban Transport Study (1999)* revealed that the majority of traffic on the A26 Hadlow Road either originates in, or is destined for, Tonbridge. The 1998 Hadlow Road Southbound Roadside Interviews, revealed the following origin and destination information.

Origin and Destination Summary of A26 Hadlow Road Southbound Roadside Interview Survey, 1998⁵

From	To			Total
	Outside Tonbridge	Northern Tonbridge	Southern Tonbridge	
Outside Tonbridge	22%	8%	34%	64%
Northern Tonbridge	13%	2%	21%	36%
Southern Tonbridge	0%	0%	0%	0%
Total	35%	10%	55%	100%

- 2.7 Sensitivity testing has been carried out to assess the impact of unrestrained TEMPRO growth in addition to full development flows in Tonbridge.⁶ As explained above, the high background traffic growth scenario is not one which is considered realistic, since the application of higher background traffic growth rates in conjunction with the detailed calculations to derive traffic from the new town centre developments represents a significant amount of double counting.
- 2.8 As to be expected the addition of extra background traffic results in the deterioration of the performance of some junctions during the peak of the peak hour. The Assessment of Sensitivity Testing noted that for the "2016 Do Minimum + Hadlow Road to London Road Link Scenario 2" most of the arms at the key junctions in the town centre had RFCs of less than 1 in the PM peak, although it is noted that the RFCs for most arms at the Hadlow Road, Cannon Lane junction (Table 4) are in excess of the typically used 0.900 threshold. However it must be reiterated that these results are predicated on an assumption of on high background growth which is not considered to be realistic.
- 2.9 The HRNG make reference to a number of specific factors which they argue support higher background traffic growth factors. These are discussed below:

Tonbridge – Tunbridge Wells Regional Hub

- 2.10 The emerging South East Plan (2006) identifies Tonbridge-Tunbridge Wells as a regional hub. However, this is not the same as saying that it will be a centre for road traffic. A regional hub can be defined as a settlement where the provision of (or potential to provide) a range of multi-modal transport services supports the concentration of land uses and economic activity in a suitable manner.⁷ The Independent Panel's report into the South East Plan noted that

⁵ RD 7.46 - *Tonbridge Urban Transport Study – Table 2.3*. Babtie (1999)

⁶ RD 7.44 - *Tonbridge Town Centre Area Action Plan – Sensitivity Testing (High Traffic Growth); Development Schedule*. Jacobs (2007)

⁷ RD 2.2 - Section D1, paragraph 1.21 in *The South East Plan – SEERA* (2006)

this could involve "...improvements to links with East Sussex, Crawley/Gatwick and Maidstone as well as sustainable transport between the two towns."⁸

- 2.11 "A highly accessible focus for employment, community, retail, leisure and cultural services" means highly accessible for all modes, especially walking, cycling and public transport. Jacobs report on *Tonbridge Urban Transport Delivery*⁹ outlines a number of proposed sustainable transport measures for improving connectivity to and from, and within, the proposed Hub. These include improved integration of bus and rail services through schemes such as Plusbus. This a cross bus and rail industry scheme relaunched in Kent in May 2007, whereby users can buy an all-in-one ticket for rail and bus travel in Tonbridge – and improved interchange between rail and other modes through improvements to the railway station, and walking and cycling environment on the approaches.

Fast Growing Development Areas

- 2.12 As explained in the *Technical Note on Trip Generation, Distribution and Assignment (Chapter 4)*,¹⁰ the gravity modelling has taken the attraction of employment outside of Tonbridge into account, with journeys generated by new residential developments in Tonbridge distributed to places such as Tunbridge Wells, Kings Hill, Paddock Wood, Sevenoaks, etc. according to their attractiveness and distance. Ashford is difficult to access by road from Tonbridge, with rail a much more convenient option for travel between the two towns.
- 2.13 Likewise, proposed employment developments in Tonbridge have taken into account commuting distance statistics from the 2001 Census for residential areas such as Kings Hill, Paddock Wood, Tunbridge Wells, Sevenoaks and Borough Green in developing a gravity model for these developments. This factor is therefore already taken into account.

Licence/ Car Ownership

- 2.14 *The Eddington Study* notes that levels of driving licence ownership have been falling among 17-20 year olds, but rising for the over-60s. These groups are the main users of buses, and the introduction of free fares for the over-60s may reverse the trend to some extent.¹¹
- 2.15 Probably of greater relevance to traffic growth is car ownership levels. Tonbridge already has above average levels of car ownership. For any given increase in GDP, scope for increase is therefore likely to be less than in areas where levels of car ownership are currently low. Examples from the 2001 Census include¹²:

⁸ RD 2.4 - *Panel Report on the Regional Spatial Strategy for South East England* Para 26.73, p.430. - Swain, C *et al.* (2007)

⁹ RD 7.31 – *Tonbridge Urban Transport Strategy – Delivery – July 2007*

¹⁰ RD 7.36 – *Technical Note on Trip Generation, Distribution and Assignment – Jacobs (2007)*

¹¹ RD 1.27 - *The Eddington Transport Study: Main Report: Volume 4, p.280. HM Treasury (2006)*

¹² www.nomis.co.uk, accessed 8 October 2007.

Car Ownership per household in Tonbridge compared to the Kent and national average

Area	Percentage of households		
	Without Car	1 Car	2 or more cars
Cage Green	17.5	43.0	39.5
Castle Ward	17.9	48.1	34.0
Higham Ward	16.1	43.1	40.8
Judd Ward	21.8	50.4	27.8
Medway Ward	23.7	47.2	29.1
Trench Ward	26.9	44.5	28.6
Vauxhall Ward	19.5	50.6	29.9
Kent	21.6	43.5	34.9
England	26.8	43.7	29.5

Strategic Location of West Kent

2.16 The HRNG makes reference to the strategic location of West Kent with Ebbsfleet on its doorstep attracting higher than average economic growth. However the extent to which this will be translated into additional road traffic is already defined by the development land allocations and the travel demand management policies set out in existing Government Planning Guidance and the TCAAP. This argument would be more relevant to the Kent Thameside Growth Area (including Dartford and Gravesend) where there are ample brown field sites available for redevelopment. It is further considered that Ebbsfleet is too remote from Tonbridge to have any major impact on traffic levels locally.

Summary on the issue of traffic growth

2.17 The Council's position remains that to include unrestrained TEMPRO growth factors in addition to the traffic generated by new development would be to significantly double count its impacts.

Smarter Choices

2.18 The HRNG submission suggests that the reduction of 14% in existing Traffic levels, from Travel Plans and a district-wide Smarter Choices programme, is unlikely to be achieved.

Work-related journeys

2.19 The best available data on journey purpose is from roadside interview data that informed the 1999 *Tonbridge Urban Transport Study*¹³. For instance, roadside interview surveys conducted on A26 Hadlow Road found that 20% of drivers using the southbound carriageway were on employers business over the course of the 12 hour survey period. A full breakdown is given below.

¹³ RD 7.46 – Tonbridge Urban Transport Study – Babbie 1999

A26 Hadlow Road Southbound Roadside Interview Survey 1998 – Journey Purpose Summary (previously unpublished)

Destination Trip Purpose	A26 Hadlow Road southbound
Home	13%
Work	28%
Employers business	20%
Services	9%
Shopping	10%
Leisure	12%
Education	7%
Hotel / Holiday	<1%
No purpose given	1%

2.20 On this basis the Hadlow Road Neighbourhood Group’s suggestion that 30% of traffic on the A26 is employers business is a significant overestimate. The assumption that people on employers’ business are unlikely to change modes or reduce travel need in response to smart measures such as workplace travel plans is also over-pessimistic. Some work-related trips are clearly unavoidable, but evidence is that reducing business travel is increasingly a target of travel plans, with companies keen to realise savings in travel costs and staff time offered by introducing measures such as more efficient delivery schedules and video/audio conferencing.

2.21 With regard to commuting trips, recent guidance from the DfT¹⁴ (based on substantial research into actual travel plan outcomes) sets out clear trip reduction targets, relative to different levels of travel plan investment and measures that it considers achievable within three to five years of implementing a travel plan. Revised figures from the DfT are summarised below:

DfT Guidance on Travel Plan Measures and Probable Car Trip Reduction

Probable Car Trip Reduction	Travel Plan Measures
0%	A plan containing marketing and promotion only
5%	A plan with the above plus car sharing and cycle measures
10%	A plan with the above plus large public transport discounts and works buses/additional public transport links
15-30%	A plan with a combination of all the above measures plus a disincentives to car use (e.g. parking charges)

¹⁴ RD 1.28 - *Guidance on Assessment of Travel Plans* - Department for Transport (2005)

District Wide 'Smarter Choices' Concept

- 2.22 The reduction in vehicle trips through smarter choices envisages a range of measures to increase walking, cycling, public transport use and in some cases reduce the need to travel at all through providing greater transport choice, knowledge and accessibility.
- 2.23 It is noted that the Eddington Study quoted by HRNG supports the concept of smarter choices as offering potential for reducing congestion. The Eddington study notes that:

*"Smart measures tend to be primarily targeted at problems during the commuter peaks on congested urban and inter-urban roads with the aim of facilitating better and more efficient use of cars, by promoting car pools or car sharing for example, or providing the incentive to travel using alternative modes of transport by highlighting the benefits of alternative means of travel. School buses can also play a role in this regard, and have been introduced in some areas, with the aim of easing pressure on the road system caused by the school run."*¹⁵

*"Encouraging cycling, walking and smarter choices has the potential to provide benefits to the economy and welfare through both reduced congestion and the associated likely reduction in greenhouse gas emissions and other pollutants, and improved health. Little evidence exists on benefit : cost ratios for such interventions, largely owing to the significant uncertainties around the costs. But the DfT analysis suggests that with high intensity uptake of smart measures, some **21 percent** reduction in urban traffic could be achieved".*¹⁶

- 2.24 The document on *Tonbridge Urban Transport Delivery*¹⁷ makes reference to a number of initiatives to reduce car use, with reference made to what is being proposed and already being actioned in Tonbridge.

Improving public transport uptake

- 2.25 The Independent Panel's report into the South East Plan notes the need for improved sustainable links between Tonbridge and Tunbridge Wells. As noted in *Tonbridge Urban Transport Delivery* bus services in Tonbridge have generally experienced significant improvements during 2007. Recent examples are highlighted in sections 1.5.1 and 1.6.1 including:

- A bus every 10 minutes between Tunbridge Wells and Tonbridge along the A26 corridor during the day,
- 2 buses an hour to Maidstone and Sevenoaks.
- Doubling of the frequency of buses (services 218/219) along Shipbourne Road, so that there is a bus every 7-8 minutes between the town centre and the Pinnacles.
- The introduction of a pilot school travel initiative, whereby 11-16 olds at schools in Tonbridge, Tunbridge Wells, Cranbrook and Paddock Wood will be able to purchase a bus 'Freedom Pass'. This will be

¹⁵ RD 1.27 - Eddington Study, Volume 3, para. 3.38, p.156. - HM Treasury (2006)

¹⁶ RD 1.27 - Eddington Study, Volume 3, para 3.44, p.157. HM Treasury (2006)

¹⁷ RD 7.31 – Tonbridge Urban Transport Strategy – Delivery. Jacobs (2007)

valid for travel by bus to and from school, and can also be used in the evenings, weekends and holidays for any bus journey that stops in Kent. Pupils will pay just £50 to cover administrative costs and passes will be valid until the end of August 2008.

- 2.26 This initiative is aimed at cutting car use for some of the shorter journeys to the area's schools, where walking is not an attractive option (1 to 3 miles). Free travel at other times should also reduce the need for friends and family to offer escort trips by car and moreover, by encouraging young people to use the bus more, sow the seeds of a greater public transport mode share in the future.
- 2.27 Kent County Council is also widening the implementation of its school travel plan programme. Chapter 6 of the *Technical Note on Trip Generation, Distribution and Assignment*¹⁸ noted that experience to date from Tonbridge schools with travel plans is an 11% reduction in vehicle trips after the implementation of a school travel plan (prior to the introduction of the freedom pass). Their implementation at other schools in Tonbridge will help to reinforce the free school travel initiative in reducing education-based vehicle trips in the town.
- 2.28 It is acknowledged that evening services need improvement along with links to Tonbridge from Pembury Hospital and Knights Park in Tunbridge Wells. Town centre development is seen as the means to pump prime evening and additional services to key destinations.
- 2.29 Section 1.6.2 of *Tonbridge Urban Transport Strategy - Delivery* also noted recent improvements in train services to Tunbridge Wells reducing the need for commuters to drive into Tonbridge, as well as forthcoming improvements following the 2009 timetable recast, including additional daytime train services between London Charing Cross and Tunbridge Wells and new direct train services between Tonbridge and Maidstone, reducing the need to drive to Tonbridge by car from the neighbouring regional hub of Maidstone.

Cycling

- 2.30 It is conceded that the existing cycling environment in the town centre is not ideal. However the new Cycling Strategy¹⁹ is designed to improve this. Detailed design work for the Tonbridge Urban Transport Strategy is also addressing cycle issues alongside other network improvements. This includes provision of improved crossing facilities and improved facilities at junctions such as advanced stop lines. Work to improve cycle facilities on the key north/south corridor is continuing with schemes being developed to improve cycle routes on Railway Approach and the cycle environment on the High Street.
- 2.31 It is undoubtedly true that cyclists are more vulnerable to injury if they are involved in any sort of collision than car occupants. The latest DfT figures casualty statistics²⁰ indicate that for each mile travelled, pedal cyclists are actually 15 times more likely to be killed or seriously injured, and 8 times more likely to be killed than a car occupant, per mile travelled. However the statistical chance of a cyclist being killed or seriously injured is still extremely

¹⁸ RD 7.36 – Tonbridge Town Centre Master Plan – Technical Note on Trip Generation, Distribution and Assignment – Jacobs (2007)

low at 1 death or serious injury for every 1.88 million kilometres cycled. Furthermore, the chance of death or serious injury while cycling is many times outweighed by the health benefits of active travel.

- 2.32 Many research projects confirm the health benefits of cycling, one of which - carried out in Copenhagen²¹ - found that cycling to work (an average of 3 hours cycling per week) decreased risk of mortality by about 40% compared to a sedentary control group. This study, carried out over 14 years involved 30,000 people and took into account age, health status, and socio-economic factors such as education.
- 2.33 Nationally the number of miles cycled, both for leisure and utility trips is increasing rapidly. At the same time rates of injury to cyclists are falling. Experience both in the UK and in mainland Europe indicates that the safety of cycling increases as numbers cycling increase and motorists become more accustomed to sharing the road with cyclists.
- 2.34 Tonbridge is a relatively compact urban area, and with new facilities and incentives for cycling that will be provided by workplace and – especially- school travel plans, and the growing appreciation of the health benefits of active travel, potential for increasing cycling is very significant.

High Street Diversion

- 2.35 Reduction in vehicle flows on the High Street corridor is a key objective of the TCAAP. The measures proposed will have both direct and indirect benefits. Direct benefits include:
- Reduction in traffic, together with other improvements to footpaths and crossing facilities, which will make the High Street a safer and more pleasant environment for pedestrians, improving the attractiveness of Tonbridge as a shopping centre
 - Reduction in traffic delays will improve the reliability and attractiveness of bus services

In addition:

- Pedestrian improvements will encourage more local trips – including trips to the station- to be made on foot
- Improvements in bus reliability and convenience will encourage more local trips to be made by bus

This will tend to further reduce the number of car movements on the High Street and hopefully begin to fuel a 'virtuous circle' of increasing sustainable mode share.

- 2.36 The initial reduction in traffic will be principally influenced by the signing strategy which is aimed at directing traffic via Cannon Lane, and by 'gateway'

¹⁹ RD 7.42 – Tonbridge and Malling Cycling Strategy – draft for Consultation

²⁰ RD 1.29 Road Casualties Great Britain: 2006 - Annual Report Table 26, p.122. – Department for Transport (2007)

²¹ RD 7.48 - Anderson, Lars Bo "All-Cause Mortality Associated With Physical Activity During Leisure Time, Work, Sports and Cycling to Work" Archives of Internal Medicine Vol 160 No. 11 June 12, 2000.

features at the north and south end of the High Street. To reinforce this pedestrian crossings in the High Street will be set to give more priority to pedestrians outside peak hours. At the same time there will be some local reductions in the width of the carriageway and other measures to improve the pedestrian environment.

- 2.37 If the London Road/Hadlow Road Link can be constructed and the Bordyke closed at its northern end, this will provide a further incentive for through trips to divert from the High Street to the Cannon Lane route, but without reducing the actual capacity of the High Street.
- 2.38 Apart from the adjustment to the pedestrian signals, none of these measures will actually reduce available capacity, merely steer a proportion of traffic away from the High Street. Babbie's 2002 report²² found that there is sufficient width to reallocate some road space to pedestrians without affecting the capacity of the road itself, and at peak hours pedestrian phases can be reset as necessary to ensure that there remains adequate overall north/south capacity on the network.
- 2.39 Concerns have been expressed by several respondents to the TCAAP that any reallocation of roadscape in the High Street will exacerbate the delays already sometimes caused by delivery vehicles unloading outside High Street premises. The detailed scheme currently under consideration includes provision for delivery bays close to all premises which do not have rear access. Other measures to minimise disturbance due to deliveries (including greater use of rear access and, possibly, limitation on delivery hours) will also be considered in conjunction with physical measures and consulted on when the scheme is developed in more detail.
- 2.40 To the extent that north/south traffic is displaced from the High Street it will inevitably need to go elsewhere and, although some capacity improvements can be made, capacity at the Cannon Lane/Vale Rise and Cannon Lane/Hadlow Road junctions will inevitably limit this. A further sensitivity test has been carried out by Jacobs²³ which confirm the findings of the 2000 Babbie work in this regard²⁴, and has shown that complete closure of the High Street, even off-peak, with or without the London Road/Hadlow Road Link, is unlikely to be an option in the foreseeable future unless an unexpectedly high modal shift away from the car is achieved.

Bordyke

- 2.41 It is pointed out by HRNG that Jacobs' recent modelling work (Table 4.1) shows that closure of the High Street would have an unacceptable impact on traffic flows in the Bordyke. This is not disputed, the impact of total closure of the High Street was modelled as a sensitivity test only. Relieving traffic pressure on the Bordyke conservation area is, in fact, one of the key aims of the TCAAP, whether this is achieved partially, by promoting lower car use through the 'Smarter Choices' programme, or completely, by providing the new the London Road/Hadlow Road Link and closing the Bordyke to general traffic.

²² RD 7.40 - *Tonbridge High Street Infrastructure Improvements* - Babbie 2002

²³ RD 7.45 - *Technical Note on Key Scenario Impact on High Street Flows* - Jacobs 2007

²⁴ RD 7.46 - *Tonbridge Urban Transport Strategy* - Babbie (1999)

Hadlow Road/Cannon Lane Junction

- 2.42 The Hadlow Road/Cannon Lane junction is one of the key junctions on the local network and is already over capacity in peak hours. It is recognised that if nothing is done, future peak hour flows are inevitably going to increase between 2006 and 2021, which will further increase congestion at this location. Tables 3.4 and 4.4 of Jacobs Options Testing Report²⁵ show the likely impact of various development scenarios in future years in the AM and PM peaks respectively.
- 2.43 Various network improvement options have been tested for the 2011 development case, and the impact of these is described in Sections 3.4 and 4.4 of the Report. However, in each case the Cannon Lane junction itself remains over capacity on one or more turning movements. In Section 5 of the Options Testing Report, the impact of possible Smarter Choices programme is assessed and it is concluded that if vigorous demand-management measures can be implemented to reduce background traffic levels (it is already assumed that Travel Plans will be implemented by individual development sites) the Cannon Lane junction will be at, or only slightly above, capacity in the PM peak (Table 5.1 of the report illustrates this).
- 2.44 Although the Smarter Choices measures that will be required are described as 'vigorous' (and the target reduction of 14% described as 'challenging'), this is to allow for the problems that are likely to be presented by the geography and demographics of the Tonbridge area. It is actually at the lower end of the 14% - 21% reduction in vehicle trips which have been found to be possible by recent research into the impact of demand management measures.
- 2.45 HRNG suggest that if their prediction of traffic growth are used the impact on the Cannon Lane junction become clearly unacceptable, even with Smarter Choices reductions. The assumptions on Traffic Growth, and on the impact of Smarter Choices on which the TCAAP is based are dealt with above.
- 2.46 Work on developing demand management and network improvement options, to deliver the best solution for the network as a whole, including the Hadlow Road/Cannon Lane junction is continuing as part of the detailed development of the TCAAP Transport Delivery Programme. Air Quality assessment carried out by Bureau Veritas²⁶ suggests that Air Quality will not be a problem at this location in the future years considered.

Hadlow Road Bypass

- 2.47 HRNG argue that there is a need to construct a bypass to Hadlow Road. This matter is dealt with in Section 5 of Position Statement TON02. The option was examined in detail in the 1999 Babbie Report²⁷. It was found that, despite local benefits and local public support, the benefits in traffic terms were modest and the environmental impact on the adjacent floodplain unacceptable. This situation has not changed.

²⁵ RD7.32 – Tonbridge Town Centre Master Plan – Technical Note – Option Testing – Jacobs (2007)

²⁶ RD 7.39 - TCAAP – Air Quality Assessment – Bureau Veritas Sept 2007

²⁷ RD 7.46 - *Tonbridge Urban Transport Strategy* - Babbie (1999)

HNRG's Conclusion

2.48 HRNG sum up their case in the following form:

- 1) The High Street element in the Action Plan could not be implemented without backup from a Cannon Lane – London Road Link
- 2) The Cannon Lane – London Road link could not be put in place without backup from a short Hadlow Road Bypass
- 3) Therefore the High Street element in the Action Plan cannot be implemented without back up from a short Hadlow Road bypass.

2.49 However HRNG's argument fails because neither premise is correct. To sum up the response in the same format:

- 1) Clearly the construction of a Cannon Road – London Road link would mean that much more could be done to relieve the High Street without throwing additional traffic onto Borden and The Ridgeway / Yardley Park Road, which is why it is desirable. However a great deal can be done to improve the High Street without reducing capacity and without the new link being built.
- 2) Introduction of the London Road/Hadlow Road Link does result in some increase in congestion on some arms of the Cannon Lane junction. However, if a vigorous Smarter Choices programme can be implemented, the junction should still operate reasonably well.
- 3) On these grounds, the conclusion of the 199 Babbie Report²⁸ (that the benefits of the new bypass, constructed on a greenfield site and in a floodplain, would not be sufficient to justify the cost and environmental disbenefits) still stands.

3 Highways Agency [69]

3.1 The Highways Agency has no remaining objections to the TCAAP provided there is a commitment to a reduction in parking standards as part of an overall strategy which provides sustainable transport alternatives. It suggests the inclusion of the following words:

“Development should aim for parking standards tighter than those identified as maximums in the national parking standards (currently PPG13 and Kent County Council parking standards) and the South East Plan, unless superseded by new standards set in DPDs”

3.2 It is accepted that in accordance with PPG13 and PPG6 a lower level of car parking provision may be made on development sites within the town centre as part of a package of sustainable transport measures identified in a Travel Plan. There have been a number of proposals permitted in the recent past where the

²⁸ RD 7.46 - *Tonbridge Urban Transport Strategy* - Babbie (1999)

level of parking provided has been below the maximum parking standards. In some cases, zero parking has been provided. In others, the Council has taken a realistic view of the management of the multiple-use of spaces in mixed-use developments.

- 3.3 The Council's preference therefore is not to reduce the parking standards themselves but to use them as a benchmark against which reductions can be judged as part of a comprehensive package of sustainable transport initiatives identified in Transport Assessments and Travel Plans. This would be complementary to the Council's management of its own car parks and on-street parking aimed at rebalancing parking stock from long to short stay. It would therefore prefer to see the following words included at the end of para 7.7.2 immediately before Policy TCA15:

“Maximum parking standards will act as a benchmark against which reductions in parking provision can be judged as part of comprehensive packages of sustainable transport initiatives that will be identified through Transport Assessments and Travel Plans associated with individual development proposals”.

4 Tonbridge and District Railway Travellers' Association (Mr Terry Hines) [55]

General Observation

- 4.1 The Association's general scepticism towards smarter choices reflects past evidence in Tonbridge in conjunction with national land use and transport policies that favour the private car, rather than what can be achieved in the future. Past performance cannot be taken as a guide here. Over the last 10 - 15 years, and especially over the last 1-2, there has been a sea change both in Government policy and in public opinion. Thus:
- Government transport policy is now in place to enable measures such as congestion charging and workplace parking levies
 - Reforms have been made in the way local government can work with bus companies
 - Government and local planning policy guidance now restrict major development to locations with good sustainable access
 - effective Travel Plans now have to be provided for new Employment, Leisure and increasingly Residential sites.
 - there is a far greater public acceptance of the fact that some reductions in car use are necessary on both environmental and health grounds
 - a number of best Smarter Choices practice examples have been implemented (most recently the three Sustainable Travel Demonstration Towns of Peterborough, Worcester and Darlington) enabling effective demand management measures to be developed and achievable impacts predicted.
- 4.2 This means that there is now a far more favourable environment for the success of local measures to encourage buses, walking and cycling and to reduce car use. Indeed since the publication of the Eddington report it is beginning to be widely accepted that in the long term there is no other choice.

This view is supported by Highways Agency who note in their written response of 17 September 2007 that:

“while there may be scope for some localised capacity and operational improvements, we suggest that the emphasis within the LDF should be on reducing the need to travel and focus on sustainable modes”.

Transport Strategy May 2000 and Beyond

- 4.3 The paper on *Urban Transport Strategy Delivery* was produced in June 2007 after consultation with Arriva and Kent Passenger Transport. Recent improvements to bus services in Tonbridge in 2007 are highlighted the response to HRNG (see para 2.25).
- 4.4 The detailed points (3 to 7) made by the Tonbridge and District Railway Travellers' Association concerning public transport, station car parking and evening bus services on certain routes from Tonbridge are noted and will be considered in the future development of the Transport Strategy.

Hildenborough Station Opportunities

- 4.5 The suggestions concerning improving sustainable access to Hildenborough station by cycle and bus is noted, and will be considered in the future development of the Transport Strategy.

Conclusion

- 4.6 The new development associated with the TCAAP brings with it the opportunity to provide new sustainable infrastructure, such as walking and cycle links, pump priming for new bus services/ extended hours of operation, etc. which would otherwise not be possible.

5 Mr and Mrs Mitchell [314]

Increased Traffic Levels to Borden

- 5.1 Reference is made to an option test that demonstrated the significant increase in traffic on Borden associated with an off peak closure of the High Street without providing the Hadlow Road – London Road Link. This option will not be pursued, and was only tested to illustrate any environmental, air quality and congestion implications if the off-peak closure of the High Street was implemented without the London Road/Hadlow Road link.
- 5.2 The concern with smarter choices is discussed in the response to the HRNG (para 2.18 et seq). The impact of the TCAAP on Cannon Lane has been assessed in the *Technical Note: Option Testing*²⁹ with analysis of the issues at both its junctions with Hadlow Road and Vale Rise.

²⁹ RD 7.32 Tonbridge Town Centre Master Plan – Technical Note – Option Testing – Jacobs (2007)

Safety

- 5.3 The safety concerns of residents and pedestrians along Bordyke are recognised. Section 4.5 of *Tonbridge Urban Transport Strategy Delivery* notes that the existing junction of Bordyke and East Street is unwelcoming to pedestrians and recommends pedestrian friendly improvements as part of the Transport Strategy to support walking and reducing the dominance of the car in this part of Tonbridge.

Conclusion

- 5.4 The respondents' support for the London Road/Hadlow Road Link to alleviate traffic from the High Street is noted. The TCAAP offers the opportunity to enhance the historic area around the Upper High Street, Castle, Bordyke and East Street. The provision of new development in the town centre offers the opportunity to provide new sustainable infrastructure to encourage smarter transport choices.

6 Tonbridge Civic Society [101]

The London Road/Hadlow Road Link should be provided at the earliest opportunity

- 6.1 TCS's support for this is noted

Taxi service to be included in the Station improvements

- 6.2 Continued provision of taxi services are recognised as an important element in this key transport interchange. Taxi facilities are included in the detailed scheme being developed by KCC and will continue to form a part of any future proposals.

A one-way system using the High Street and Sovereign Way

- 6.3 The concept of a one way system with the High Street as its northbound leg has been considered in the past, but a number of potential problems were evident and as a result this option was not taken forward. Generally one way systems in town centres increase severance and vehicle mileage as has been evidenced in Chatham and Ashford where one-way systems have recently been removed. The Transport Strategy for Tonbridge is based on minimising traffic flows in the High Street and improving access to the town centre car park via the Eastern Relief Road.

7 Mr J Bartram [315]

Through HGV traffic should be routed away from the High Street

- 7.1 Mr Bartram believes that the needs of thousands of shoppers should take priority over the concerns of a few Conservation Area residents. It is recognised that there has to be a balance between providing essential access to the High Street for through vehicles and the need to deter through

movements. These aspects will be the subject of detailed design and consultation.

Reallocating road space to pedestrians will result in problems due to deliveries

7.2 This issue is covered in the response to HRNG (see para 2.35)

Maximum exposure to shops along the High Street is crucial to the survival of a market town such as Tonbridge

7.3 The aim of the Transport Strategy is to strike a balance between the needs of vehicular traffic on the one hand and benefits to shoppers/passers by on foot on the other. Either can support commercial viability

Opposed to pedestrianisation of the High Street

7.4 There is currently no intention to fully pedestrianise the High Street since, apart from any impact on High Street businesses, studies to date have consistently demonstrated that even an off-peak closure of the road would cause unacceptable congestion on alternative routes. Because of this, even off-peak pedestrianisation would only ever become possible if many more people than currently anticipated were to access the town centre on foot, by bus or by cycle, rather than by car. In these circumstances the increase in footfall would be likely to more than counterbalance the lack of passing vehicles – most of which would not be physically able to stop to make a purchase in any case.

8 Mr P J Freeman [317]

8.1 Mr Freeman shares Mr Bartram's concern about reallocating road space to pedestrians in the High Street which will exacerbate problems that are already caused by deliveries to those High Street shops that have no rear delivery access. This issue is covered in the response to HRNG (see para 2.35).

9 Mr Guy Harrison [318]

Supports decision not to impose restrictions on the High Street prior to delivery of London Road/Hadlow Road Link.

9.2 Mr Harrison's reading of the Strategy here is incorrect. The intention is in any case to make whatever improvements to the High Street can be effected without reducing peak hour capacity or causing problems elsewhere on the network. The introduction of the new link will, of course, allow far more scope for reducing traffic flows on the High Street.

Restrictions on the network would impact on Cannon Lane/Vale Road businesses

9.3 Basis of this is not wholly clear. Is the point that increased congestion would affect vehicle access to these sites?

Concern about traffic levels in the Bordyke on environmental, safety and severance grounds

9.4 See response to HRNG (para 2.41)

Achievement of a 14% reduction in traffic as a result of Smarter Choices measures is a reckless assumption

9.5 Largely covered in response to HRNG (see para 2.2 *et seq*) except:

The amount of development that will be brought forward on sites identified in the TCAAP is likely to exceed what has been assumed in the development of the Transport Strategy.

9.6 The TCAAP, once approved will become a key reference document in determining future Planning applications. It will thus be the benchmark against which development proposals and their traffic impacts will be judged. The modelling work undertaken for the AAP will be used to assess the transport impact of individual proposals. Any development proposals that significantly exceed the planned development density will need to address the issue and compensate by incorporating a higher level of demand management and/or sustainable infrastructure measures appropriate to the impact of the scheme.

Shifting air pollution from the High Street to surrounding residential areas is wrong

9.7 The impacts of the TCAAP proposals on local Air Quality have been thoroughly assessed by TMBCs Environmental Consultants Bureau Veritas³⁰. Their work confirms there will be no locations where Air Quality is outside government guidelines in the future years tested.

Concerns about traffic levels on Bordyke

9.8 See response to HRNG (see para 2.41)

One way system on Southern High Street / Medway Wharf Road / Sovereign Way

9.9 See response to Tonbridge Civic Society (see para 6.3)

10 Mr Rutland [328]

Concern about through traffic using A roads through Tonbridge rather than risking Motorway delays

10.1 Traffic Surveys carried out by Jacobs in connection with recent study work, and reported in Section 3 of their Technical Note on Data Collection, found that a surprisingly small number of vehicle trips on the Tonbridge network were 'through' trips (ie trips that did not either originate or terminate within the survey cordon)³¹. For example, between 8.00AM and 9.00 AM, of vehicles entering

³⁰ RD 7.39 – TCAAP – Air Quality Assessment Bureau Veritas – Sept 2007

³¹ RD 7.47 Technical Note on Data Collection - Jacobs (2007)

Tonbridge by the A26 Quarry Hill Road, surveys found that just 7% were picked up travelling away from the town on Hadlow Road, 4% on London Road and 5% on Shipbourne Road (a total of 16%), and of these, some may have been destined for locations outside the survey cordons but still within the Tonbridge Urban Area.

- 10.2 The Highways Agency (HA) have been active in scrutinising the developing Transport Strategy that underpins the TCAAP. This is precisely because they are concerned to prevent short local trips causing congestion on strategic routes and motorways. Alongside targeted local capacity improvements, the HA are also actively considering a number of innovative Traffic Management measures, such as hard shoulder running at peak periods and variable speed limits, to reduce motorway delays. To the extent that this is successful, the likelihood of drivers routing through Tonbridge to avoid motorway delays should reduce, or at least be contained, in the future.

There should be new slip roads at the Quarry Hill Road/A21 junction and a one-way system for the north of the town

- 10.3 These matters are dealt with in section 6 of Position Statement TON02. It is of note that the Highways Agency in its response letter dated 17 September says:

“Having addressed the A26/A21 junction we are aware that the junction type is a free flow junction and to introduce additional slip roads at the junction would require considerable alterations to the junction. It is considered that the east bound on-slip could not be accommodated due to the close proximity of residential properties on the north side of the A21. In addition, it is considered that there could be further complications with weaving traffic between the A26/A21 and A2014/A21 junctions. The Highways Agency therefore agree with the Council that additional slip roads onto the A21 trunk roads are very unlikely to be supported or funded by the Highways Agency”.

Tonbridge Central Area Action Plan: Matter 2 – Transport related issues

	Issue	Reference
1	Are proposals to reduce traffic in the High Street desirable, practical and achievable? In particular:	
	<ul style="list-style-type: none"> would these proposals have unacceptable consequences on the functioning of the highway network and environmental considerations (conservation interests, residential amenities, air quality etc.) elsewhere? 	Proposals to close the High Street to through traffic are not achievable, because of impacts on the rest of the highway network – see RD 7.45. However proposals to close Medway Wharf Road, provide the Lansdowne Link Road and smarter choices will all reduce traffic in the High Street – see RD 7.38
	<ul style="list-style-type: none"> should the London Road – Hadlow Road Link be an essential part of the strategy? 	Yes – see Position Statement TON 02 para. 3 (4)
	<ul style="list-style-type: none"> would it preferable to divert traffic via Medway Wharf Road? 	No – see position Statement TON 02 para. 3 (7)
2.	Should the AAP include a commitment to building a Hadlow Road Bypass?	No – see Position Statement TON 02, para 3 (5); Response Statement TON 02, para. 2.47
3.	Will the additional traffic generated by the development proposals included in the Plan have an unacceptable impact on traffic congestion in the Town?	No – see Position Statement TON 02 paras. 3 (1); 3 (8); RD 7.38 and RD 7.44
4.	Are there other highway schemes that should be included in the Plan, e.g. a one-way system at the northern end of the Town?	A one-way system in northern Tonbridge should not be included – see Position Statement TON 02 para. 3 (6). The Hadlow Road to London Road link is considered more appropriate.

	Issue	Reference
5.	Should the Plan seek to reduce traffic levels through greater demand management, such as a reduction in parking?	Yes – see Position Statement TON 02, para. 3 (2); Response Statement TON 02 paras. 3.1 to 3.3 and RD 7.31
6.	Has proper account been taken of air quality considerations?	Yes – see Position Statement TON 02 para. 3 (3); and RD 7.39
7.	Are the transport proposals based on a robust and credible evidence base?	Yes – Traffic data based on October 2006 surveys – see RD 7.47; Development trip data from the TRICS® database – see RD 7.36; Assumptions regarding background traffic growth - see RD 7.36 and Response Statement TON 02, paras. 2.2 to 2.9. Smarter Choices assumptions based on DfT research – see RD 7.31