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Swale BC Main Modification 191/192  
MIQ 3.5 and MIQ 5

FAO: Sue Turner Inspector

ADDENDUM To: Traffic Statement of Common Ground (SOCG)

## SUMMARY

This SOCG raises more questions than answers to the very serious day to day traffic issues being experienced along the A249 corridor and in particular the M2/J5 interchange and Keycol roundabout. It has been hastily put together as a result of the many traffic concerns raised by respondents to the consultation process in 2016. There is no evidence to support that this proposed development at Wises/Cryalls Lane MUX1 with proposed road layout at Chestnut Street will help mitigate these issues by creating a strategic highways infrastructure. Indeed it will lead to an exacerbation of current issues to an unacceptable level and will make Borden even more of a rat run than it is today. The children and staff at the local Primary School in School Lane will be at greater risk as drivers try to avoid congestion at the newly proposed roundabout. I attach a copy of the developers' proposed layout though it omits the Keycol Street roundabout which Highways England says is at maximum capacity today. The M2/J2 interchange along with Keycol roundabout is noted as one of the worst road junctions in the whole of the UK with 'a very poor safety record'. **The A249/J5 junction has been closed for hours if not whole days 4 times this year already** BEFORE any additional traffic load which will arise from the many other proposed housing developments. I and the residents of Swale support the need for housing. We know it is necessary but this proposed development at Wises Lane is just too dangerous and too close to this 'major casualty' location with NO escape routes. There will be increased traffic gridlock, increased road casualties and road closures and people will not be able to get to and from their place of work. This in itself will have an adverse affect on the economy of the region. Much of the SOCG highlights too many unknowns and a lack of robustness of the road lay out scheme as proposed by the developers much of which has yet to be tested. Indeed the proposed road solution will merely lead to the creation of another 'A road' running parallel to the existing A2 but right through the proposed housing development. The ensuing congestion at the much smaller Chestnut Street roundabout will mean drivers will seek other rat runs via the village of Borden. Air pollution too has been glossed over and not robustly addressed. This, together with the fact that some of the statements in the Technical document SBC/PS/123a can be proved to be inaccurate and misleading, render this SOCG inadmissible.

1. Grave concern that Quinn Estates a developer allowed to attend meetings with Swale BC, HE and KCCH. If this was allowed for information purposes then representation from the residents should also have been allowed as they too have valuable input given that they live there. Many residents are more than qualified to have given justifiable input to these meetings.
2. I have to contest some of the premises on which this statement has been agreed:
  - Para 1.2 of statement: this is based on data from Dec 2015 and on a target of 740 dwellings PER ANNUM since when higher targets have been set and traffic flows greater. The development at Wises Lane/Cryalls Lane alone

has now been raised to 700+ dwellings. **As 1.2 states further research will be needed to establish the degree of impact of an increased target on the A249 junctions with the local highway.**

- As per para 3.3 the developer is promoting development all along the A249 corridor including Detling Hill. This has not been taken into account in preparing this statement but is certainly germane as Detling Hill is ON the A249. The same Detling Hill that was closed for 24 hours Friday 13 January 2017 due to an overturned transporter. According to para 3.5 HE require 'developers to have regard to the whole of the A249 corridor' but this statement of agreement clearly has not done so and 'further testing' should be mandatory before any agreement can be signed off to say development at Wises/Cryalls Lane can go ahead.
- This year alone up to the third week of January 2017 the A249/M2 has been closed four times for many hours preventing commuters getting to work or having to find alternative routes through villages to access the M2 or M20 or A2. Para 2.3 re-confirms that the A249 corridor particularly at J5/M2 interchange is '**identified in the list of the top 50 national casualty locations on the trunk and motorway network.**' A full Transport Assessment should be an absolute requirement beforehand as they cannot afford to get this wrong.
- Para 4.8 The effectiveness of the proposed 'mitigation' of the Keycol roundabout as well as the M2/J5 interchange being promoted by the developers has not been proven. The problem will move elsewhere. The proposal by Quinn Estates to build a roundabout leading from the proposed development at Wises Lane onto Chestnut Street means that Chestnut Street village road becomes a highway and effectively a third lane of the A249. The signalisation at the A2/Wises Lane proposed by the developers means that additional **heavy traffic** will now be directed from Sittingbourne A2 THROUGH the development itself, where there is a school proposed, to access the roundabout at Chestnut Street to get access to M2 or A249. This will effectively become a second 'A2' running parallel to the current one but this time through a major development.
- Para 4.9 The 'alternative routing for traffic' from the A2 via the development is not a benefit! It will be going from a trunk road to a smaller road with heavy lorries. Additional traffic signalisation at Wises Lane/A2 will cause even more tailbacks into Sittingbourne one way system than we have today. Secondly the suggestion that the 'alternative routing' will bring relief at Keycol roundabout is unfounded. Where is the evidence? It will be at best short-lived; it will be minimal if not non-existent as current and future development by the same developers will have a need to access the Keycol roundabout. We do not need any more temporary solutions which invariably seem to become permanent as we have today. We need a strategic solution for this major on-going issue.
- Para 3.6 What is the evidence for some development having to proceed ahead of mitigation work in order to facilitate it?
- How can an 'agreement' have been signed off when issues as raised in para 3.7 have not been addressed?
- Para 4.5 states more up-to-date modelling and designs required to demonstrate robustness of any mitigation schemes.
- What are the appropriate schemes being proposed to support the level of development proposed through the Local Plan?

- Para 4.10 The points raised about rat running and exacerbating current problems to an 'unacceptable' level is precisely what the residents in **all** Swale Borough Council parishes are concerned about. They have to get to work! There are enough problems on the A249/A2/M2 corridor today and this development will not only add to them in the short term but in the future too. The 'detailed work in hand' must surely be a pre-requisite before any 'agreement' can be signed off. Para 4.10 states that further research will be needed re the proposed new route by the developers to ensure residential roads are not affected to an unacceptable degree. This is absolutely key. The developers are proposing this route 'only so they can build houses! This is their motive. If it causes chaos but enables them to make a profit from a new development they will not lose sleep over it.
  - Where is the evidence that this proposed housing development and new traffic routing will improve air quality as the developers claim? Simply diverting HGVs and traffic from the existing A2 onto another road does not improve air quality. Building this new road right through the development means the residents and school children of the proposed new development will certainly be exposed to air pollution from this diverted traffic
3. In the document referred to in Para 4.10 ie SBC/PS/123a I have concerns over some of the premises made in this document and on which basis the statement was signed off:
- Para 2.11 Where is the evidence for the 'numerous respondents' to the consultation 'highlighting the benefits' of establishing a connection through Chestnut Street and the A249'? I was at the 'consultation' and there was no-one I heard making any such suggestions. Indeed the majority of the people were trying to understand what the development was all about. To say they were suggesting this route to the A249 via Chestnut Street is ludicrous and untrue. We have **evidence** that the developers wrote responses to the consultation and subsequent supporting letters on behalf of the rugby club with the promise that the development would give them a new rugby club and pitches. All the rugby club members had to do was sign them and send in. Whilst Swale BC had no option but to accept them, this is clearly very unprofessional and unethical on the part of the developers. If this is 'normal' practice then it does not make it acceptable. This paragraph therefore should not have been allowed as it gave false and misleading information to the parties involved in the Statement of Common Ground. The only people who suggested the Chestnut Street to A249 connection was the developers themselves. Only the developers themselves knew that the Barrow Trust land would be needed to make this connection possible and this was withheld from the public till AFTER the consultation period.
  - Para 3.25 This paragraph too should not have been included in this document SBC/PS/123a as we have incontrovertible evidence that the existing Borden Primary School is NOT to relocate. Therefore the traffic trips and journey patterns referred to in this document cannot be applied. Again a false premise.