



REBUTTAL EVIDENCE

APPLICATION REFERENCE: 22/00571/AS

APPEAL REFERENCE: APP/E2205/W/24/3345454

ADDRESS: Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent (TN26 1JR)

PROPOSAL: Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access only (excluding internal circulation routes), with all other matters reserved

BY: Matthew Hogben – BSc (Hons) MA

1.1 I have produced this rebuttal in response to the proof of evidence by Mr Ian Dix of SLR Consulting. KCC has also instructed Charles and Associates (C&A) to provide an up-to-date spreadsheet including TEMPro growth rates, correct NTS data, trip distribution and assignment and subsequently new capacity assessments of the three junctions along the A28 corridor correcting the errors in the appellant's approach with only 400 dwellings at Chilmington Green (CG) being occupied as development is limited to 400 dwellings until the bond for the A28 scheme is provided. Copies of this spreadsheet have been provided direct to the appellant and can be supplied on request.

Issues on Modelling and results of correcting inputs

1.2 ID Para 2.7 discusses the journey purpose methodology adopted. It is still not explained why the journey purpose methodology was between the Transport Assessment and the Transport Assessment Addendum given that KCC accepted the previous methodology for the CG TA. There is still no evidence underpinning the assumptions that SLR have made. The issue of double counting of education trips has not been addressed serving to artificially inflates actual education trips and understate trips on the A28. KCC has reworked the Trip Purpose and external trip generation exercise based on the appropriate NTS data (Table NTS0502a) which covers the 5-year period 2015-2019 and adjusted the education splits to avoid double counting. More recent 5-year data covers 2020 and 2021 during which time there was COVID related lockdowns and restrictions and so does not represent normal travel patterns. The stark difference in results can be seen in Table 1 below:

Table 1: Updated National Travel Survey Data¹

Time	Journey Purpose (%)					
	Commuting	Education	Shopping	Personal Business	Leisure	
Appellant Proof						
AM Peak Hour	21%	64%	3%	10%	3%	
PM Peak Hour	28%	19%	15%	20%	19%	
Alternative NTS (2015-2019) - Education Adjusted						
AM Peak Hour	34	18	4	14	4	73
PM Peak Hour	27	4	14	20	19	84
Alternative NTS (As above) - Extrapolated						
AM Peak Hour	46%	24%	5%	19%	5%	100%
PM Peak Hour	32%	5%	16%	24%	22%	100%

¹ The education adjusted figures are then multiplied by 100% divided by 1.36 in the AM Peak and 1.19 in the PM Peak (this being 100% divided by 73% in the AM Peak and 100% divided by 84% in the PM Peak).

1.3 ID para 2.8 discusses the traffic distribution for each trip purpose. ID has not submitted any evidence to support the traffic distribution used and KCC does not agree with it. It would normally be expected that the key trip attractors for each journey purpose are identified then a weighting exercise is carried out based on Google Mapping analysis. I have done that exercise to correct the assumptions made by ID – see para 1.24 below.

1.4 The next section of my rebuttal will focus on the highway assessment methodology and the impact of the development of the development on the A28 corridor.

1.5 Table ID5:3 NTS Peak Hour Journey Purpose is incorrect, the correct journey purpose figures are in Table 1 above.

1.6 Table ID5:4 : Peak Hour Forecast Vehicle Trips by Journey Purpose is also incorrect, KCC has re-run these trips based on the correct NTS figures above and updated trip rates that were submitted by ID as part of his proof of evidence, in Table 2 below. The workings behind this can be found in the spreadsheet. Table 3 below shows the difference between KCC’s updated total vehicle trips and those set out in Table ID5:4. This shows 52 extra total vehicle trips in the AM peak and 25 extra total vehicle trips in the PM peak.

Table 2: Updated Vehicle Trips by Journey Purpose Breakdown

Journey Purpose	AM Peak (07:30-08:30)			PM Peak (16:30-17:30)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
New Trip Rates						
Commuting	46	109	155	72	34	106
Primary Education	12	29	41	5	3	8
Secondary Education	12	29	41	5	3	8
Shopping	5	12	16	36	17	53
PB	19	46	64	54	25	79
Leisure	5	12	17	50	24	74
Total	98	236	334	223	105	328

Table 3: Journey Purpose Difference between KCC Vehicle Trips and SLR Vehicle Trips

Journey Purpose	AM Peak (07:30-08:30)			PM Peak (16:30-17:30)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
New Trip Rates						
Commuting	30	66	96	17	5	22
Primary Education	-11	-38	-49	-12	-7	-19
Secondary Education	-11	-38	-49	-12	-7	-19
Shopping	3	5	8	7	1	8
PB	12	25	37	14	4	19
Leisure	3	6	9	11	3	14
Total	25	27	52	26	-1	25

1.7 Based on Table 2 above, Table 4 sets out the external trips on the local highway network based on agreed internalisation factors. Table 5 below shows the difference between KCC's external vehicle trips and those of ID. As can be seen there will be an extra 114 external vehicle trips on the local highway network in the AM peak and an extra 43 external vehicle trips in the PM peak compared to ID's assessment.

Table 4: Vehicle Trips Breakdown - External

Journey Purpose	AM Peak (07:30-08:30)			PM Peak (16:30-17:30)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
New Trip Rates						
Commuting	46	109	155	72	34	106
Primary Education	1	3	4	1	0	1
Secondary Education	4	10	14	2	1	3
Shopping (Food Retail)	2	4	6	12	6	18
Shopping (Non-Food Retail)	2	4	6	13	6	20
PB	14	34	48	40	19	59
Leisure	3	8	11	34	16	49
Total	72	173	244	174	82	256

Table 5: External Vehicle Trip difference between KCC and SLR

Journey Purpose	AM Peak (07:30-08:30)			PM Peak (16:30-17:30)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
New Trip Rates						
Commuting	30	66	96	17	5	22
Primary Education	-1	-4	-5	-1	-1	-2
Secondary Education	-4	-13	-17	-4	-2	-7
Shopping (Food Retail)	1	2	3	2	0	3
Shopping (Non-Food Retail)	1	2	3	3	0	3
PB	9	19	28	11	3	14
Leisure	2	4	6	8	2	10
Total	38	76	114	35	8	43

1.8 ID para 5.22 discusses traffic assignment using Google Journey Time analysis in peak periods. However, there is no supporting material and Appendix ID5 simply shows external destinations to each journey purpose and assumed routing without any explanation as to the basis for the assumptions made. I do not accept those assumptions. I would expect to see screenshots from Google Maps to evidence assumptions made. I have undertaken further analysis based on Google Maps my analysis is as follows:

- All the secondary school trips to Norton Knatchbull Grammar School and Highworth Grammar School will route along the A28 corridor to Tank Roundabout as shown in Images 1 and 2 below.

Image 1: Journey Time Analysis to Norton Knatchbull Grammar School

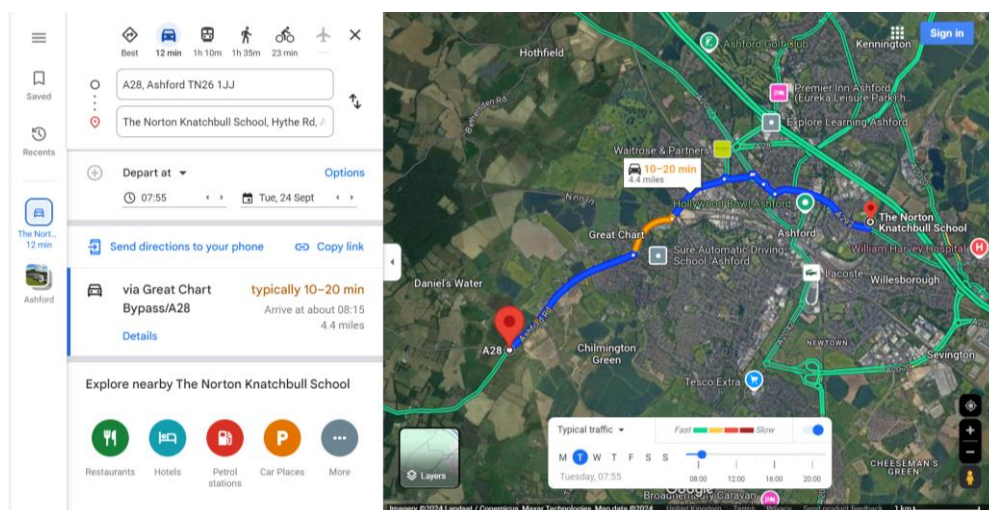
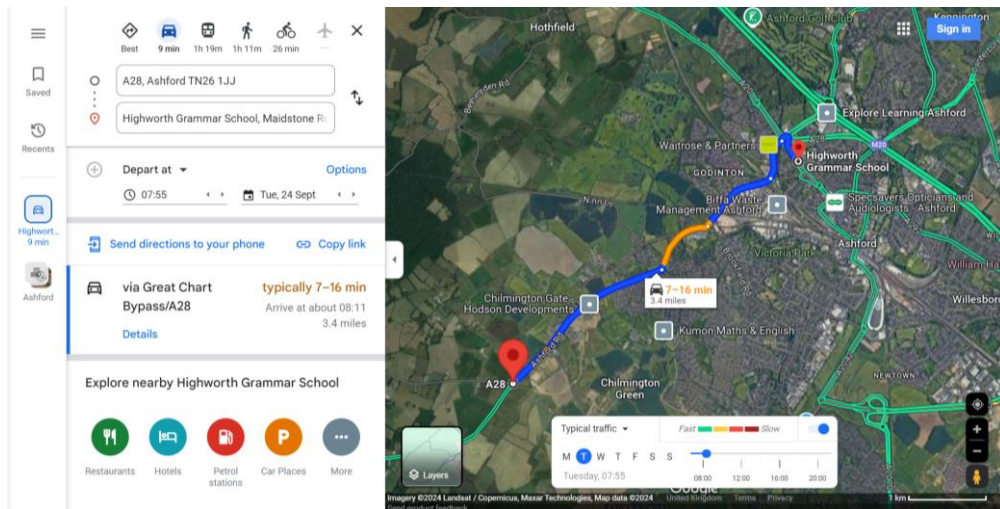


Image 2: Journey Time Analysis to Highworth Grammar School



- For non-food retail trips these are split, 50% to Ashford Town Centre and 50% to Ashford Designer Outlet. The former will route along the A28 corridor up to Tank Roundabout as this is the quickest route to get to the Town Centre and 50% along Chilmington Green Road and then up Ashford Road or via Tithe Barn Lane, Knoll Lane and Brookfield Road to the Designer Outlet as shown in Images 3 and 4 below.

Image 3: Journey Time Analysis to Ashford Town Centre

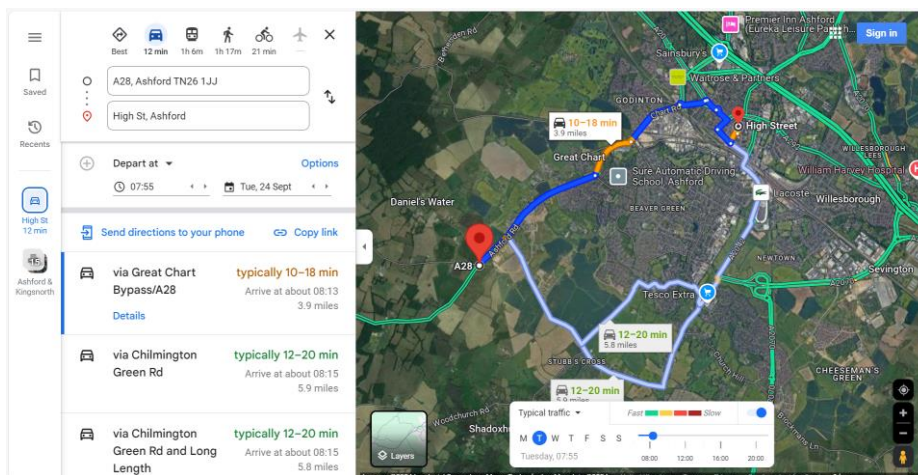
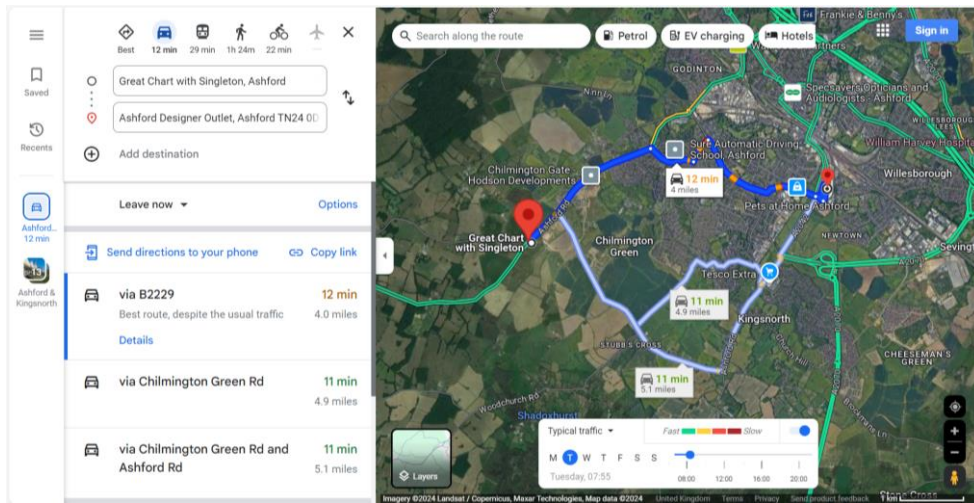
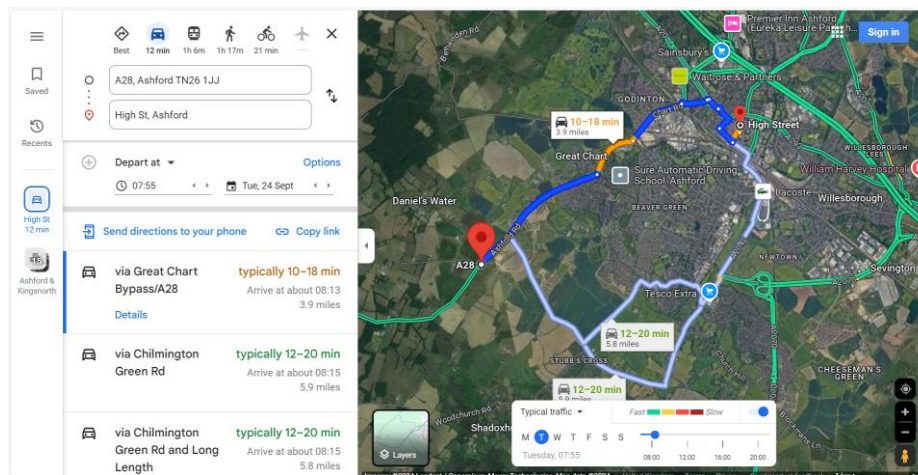


Image 4: Journey Time Analysis to Ashford Designer Outlet



- For personal business trips all will route along the A28 corridor up to Tank Roundabout towards Ashford Town Centre given that the vast majority of personal business attractors are in the Town Centre as shown in Image 5 below.

Image 5: Journey Time Analysis to Ashford Town Centre



1.9 ID para 5.24, the wrong area is used for TEMPro growth rates. A wider area should be adopted as it is incorrect to assume that only Ashford 012 will add traffic to A28 corridor. The growth of Ashford and traffic generators on the A28 is not limited to Ashford 012 which is, safe for CG, a largely rural area with limited growth. Having reviewed the middle super output areas, the following areas should be included Ashford 004, 005, 007, 008 and 012. I exhibit the plans of these areas in Appendix 1 which show why I have selected them – in short, I have included all areas where growth would be

expected to contribute to traffic on the A28. This has resulted in the following growth rates in Table 6 below.

Table 6: TEMPro Growth Rates

AM 2023 to 2032			PM 2023 to 2032			Alternative assumptions applied				
Level	Area	Local Growth Figure	Level	Area	Local Growth Figure	Area	Base HH	Base Jobs	Future HH	Future Jobs
Region	SE	1.0809	Region	SE	1.0833	SE	4064361	4915209	4394381	5035074
County	Kent	1.0762	County	Kent	1.0800	Kent	816690	877884	882343	899300
Authority	Ashford	1.0971	Authority	Ashford	1.1031	Ashford	58875	65539	67240	67137
E02004999	Ashford 004	1.0992	E02004999	Ashford 004	1.1045	Ashford 004	6331	7733	7244	7922
E02005000	Ashford 005	1.0973	E02005000	Ashford 005	1.0995	Ashford 005	4844	14057	5542	14401
E02005002	Ashford 007	1.1066	E02005002	Ashford 007	1.1142	Ashford 007	4684	2359	5359	2417
E02005003	Ashford 008	1.1054	E02005003	Ashford 008	1.1118	Ashford 008	3775	1549	4320	1587
E02005007	Ashford 012	1.0834	E02005007	Ashford 012	1.0878	Ashford 012	4315	2921	4817	2993
		1.0984			1.1035					

1.10 ID Table ID7.1 sets out the claimed daily traffic volumes along the A28 corridor between 2004 and 2023. However, the figures for many of the years are estimates not actuals an important point which is ignored by ID. Looking at the years for which there are actual counted volumes, there was a period of traffic growth between 2013 and 2017 manual counts (which then reduced because of COVID as can be seen in the 2021 count). ID's data shows that there was then growth along the A28 corridor in 2022 and 2023. Therefore, to use nil growth on the A28 corridor is not considered appropriate. There are other factors which are relevant when considering what table ID7.1 actually shows us. The opening of the Victoria Way scheme is likely to have resulted in some traffic using that route to access Ashford Town which would have diverted traffic away from the A28 corridor from 2012 onwards so there would have been further growth without the Victoria Way scheme. It is not at all surprising that there was an estimated reduction in traffic along the A28 corridor following implementation of this scheme. Table 7 below shows the total daily traffic volume per year as set out in Table 1D7:1 together with confirmation as to whether the traffic count was a manual count or estimation.

Table 7: A28 Traffic Volume Figures

Year	Total Traffic	Traffic Growth from 2004	Variation to Average from 2004-2023	Estimation / Manual
2004	26469	N/A	486	Manual
2005	25971	-1.88%	-13	Manual
2006	26101	-1.39%	118	Estimation
2007	27292	3.11%	1309	Manual
2008	26968	1.89%	985	Estimation
2009	27657	4.49%	1674	Manual
2010	27152	2.58%	1169	Estimation
2011	27171	2.65%	1188	Manual
2012	26857	1.47%	874	Estimation
2013	26261	-0.79%	278	Manual
2014	26549	0.30%	566	Estimation
2015	26342	-0.48%	359	Estimation
2016	27031	2.12%	1048	Estimation
2017	28012	5.83%	2029	Manual
2018	27814	5.08%	1831	Estimation
2019	28071	6.05%	2088	Estimation
2020	21826	-17.54%	-4158	Estimation
2021	24506	-7.42%	-1478	Manual
2022	26217	-0.95%	234	Estimation
2023	26676	0.78%	693	Estimation

End of 2011 - Opening of Victoria Way scheme

1.11 The County Council strongly disagrees with the ID's stance of applying no general traffic growth on the A28 corridor as set out in Paragraph 7.12 given the findings of Table 4 above. This assumption is also incompatible with National Road Traffic Projections, see paragraph 4.2 of the document below.

[National Road Traffic Projections 2022 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

1.12 ID relies on the improvements in delays/queues since 2019. No raw data has been submitted for the TomTom Sat-Nav data as set out in ID para 7.13. In fact, there was significant roadworks in Ashford during 2019. The construction of the M20 Junction 10A scheme with associated traffic management along the A2070 and A20 and the Ashford Designer Outlet Expansion which involved significant changes to the junction of the A2042 / Newtown Road resulted in the road closure of Newtown Road and traffic management along the A2042. It is well known that there were significant traffic problems across Ashford as a result with major rerouting to avoid this area. Paragraph 7.17 states, 'The reasons for the changes in journey times cannot be fully determined.' In fact, it is clear that the 2019 data is explicable by one off factors and cannot be relied on.

1.13 ID para 7.22 discusses that the junction model for Matalan roundabout has been calibrated using existing peak hour queuing. No evidence of model calibration and data source used is provided for the modelling assessment. Furthermore a Flat demand profile (evening out traffic flows across the hour) for the modelling assessment has been used but no justification for this is provided in terms of traffic flows across the peak hour periods. It is not appropriate to have done this. The correct approach is to consider each ¼ hour in the peak hour.

- 1.14 KCC does not agree with the statement in ID para 7.23. The C&A review document as set out in Appendix A of my proof of evidence shows that in a northerly direction it is not the Loudon Way signals that are the issue constraining capacity at Matalan roundabout. Those signals are operating within capacity. It is likely that the capacity here is a link capacity issue with the humpback over the railway bridge with restricted visibility over the bridge and too much traffic on the roundabout as the roundabout is currently operating in excess of practical capacity.
- 1.15 The capacity assessment in Table ID7.6: Matalan Roundabout does not consider any growth on the network using TEMPro growth figures. It also shows RFC's way in excess of 1 and the junction falling apart, mainly due to CG, which is required to fund delivery of A28 dualling scheme.
- 1.16 The modelling results in Tables ID7.7 and ID7.8 for Matalan Roundabout show a severe impact on the A28 Great Chart Bypass Arm, A28 NE Arm and Chart Road Arm with the proposed development.
- 1.17 The County Council does not agree to the Matalan Roundabout improvement scheme as set out in Paragraph 7.33. It does not address the issue of the constrained exit on the A28 Chart Road due to there only being 1 lane eastbound and the bottleneck in the form of the humpback bridge. The proposed mitigation scheme will also involve pedestrians crossing two lanes of traffic on the A28 Chart Road rather than one currently which brings with it extra safety risks for pedestrians crossing here. Both these issues would be resolved by the A28 dualling proposals. This scheme will not improve queuing and delay on the A28 Great Chart Bypass arm or the Chart Road arm for which no mitigation to these arms is proposed. Matalan roundabout will still be operating way in excess of capacity with RFC's above 1 which can only be resolved by the A28 dualling scheme. Ad-hoc improvements to the Matalan roundabout junction would not be appropriate due to the need for the A28 dualling scheme.
- 1.18 The County Council has commissioned C&A to undertake further junction modelling of the Matalan roundabout using the correct NTS data, TEMPro growth rates, trip rates, trip distribution and assignment. All of this can be found in the spreadsheet. Table 8 below shows the updated modelling results for this roundabout. The baseline intercept values for the arms of the roundabout as set out in my proof of evidence have been used rather than the exit blocking facility that ID uses. This shows a severe impact of the proposals on the Brookfield Road, A28 Great Chart Bypass, Chart Road NW arms in the AM peak and Brookfield Road, A28 Great Chart Bypass and A28 Chart Road NE arms in the PM peak. Even with the appellant's suggested mitigation scheme it still

shows a severe impact on Brookfield Road and the A28 Great Chart Bypass arm in the AM Peak and Brookfield Road in the PM Peak. The suggested mitigation scheme does not mitigate the impact of the proposals and actually makes queuing and delay significantly worse on the Brookfield Road arm.

Table 8: Updated Modelling Results for Matalan Roundabout

Arm	AM Peak Hour			PM Peak Hour		
	Queue (PCU)	Delay (s)	RFC	Queue (PCU)	Delay (s)	RFC
2032 Forecast Base						
Arm 1 – Brookfield Rd	76.9	245.94	1.16	33.8	115.01	1.04
Arm 2 – A28 Great Chart Bypass	24.8	139.2	1.04	48.6	290.05	1.16
Arm 3 – Chart Rd NW	24.8	248.71	1.11	5.1	62.91	0.87
Arm 4 – A28 Chart Road NE	34.3	77.02	1.01	66	130.27	1.07
2032 With Dev						
Arm 1 – Brookfield Rd	92.4	350.88	1.2	64.9	227.83	1.12
Arm 2 – A28 Great Chart Bypass	85.5	562.23	1.23	69.4	437.01	1.22
Arm 3 – Chart Rd NW	30.4	321.63	1.14	5	60.69	0.86
Arm 4 – A28 Chart Road NE	51.8	106.65	1.05	129.9	278.88	1.15
2032 With Dev - With Proposed Mitigation						
Arm 1 – Brookfield Rd	113.1	366.95	1.25	118	399.38	1.28
Arm 2 – A28 Great Chart Bypass	86.8	575.2	1.2	51.3	347.92	1.12
Arm 3 – Chart Rd NW	27.9	320.76	1.12	4.1	50.2	0.83
Arm 4 – A28 Chart Road NE	4.2	9.63	0.81	7.8	16.61	0.89

1.19 ID para 7.38 discusses that the junction model for the traffic signal junction of Chart Road / Loudon Way has been calibrated using existing peak hour queuing. No evidence of model calibration and data source used is provided for the modelling assessment.

1.20 The capacity assessment in Table ID7.12 does not consider any growth on the network using TEMPro growth figures.

1.21 The County Council has commissioned C&A to undertake further junction modelling of the Chart Road / Loudon Way traffic signals using correct NTS data, TEMPro growth rates, trip rates, trip distribution and assignment. All of this can be found in the spreadsheet. Table 9 below shows the updated modelling results for this traffic signal junction. This does not show a severe impact from the development with the proposed mitigation scheme. However, the mitigation scheme does not appear to mitigate the impact of the development and actually makes total queuing across the junction worse in both the AM and PM peaks compared to the scenario without the development. KCC

will not support a suggested mitigation scheme that does not actually improve capacity at the junction.

Table 9: Updated Modelling Results for Chart Road / Loudon Way Traffic Signal Junction

Arm	AM Peak Hour			PM Peak Hour		
	Queue (PCU)	Delay (s)	DoS (%)	Queue (PCU)	Delay (s)	DoS (%)
2032 Forecast Base						
Arm 1 - Loudon Way	8.2	83.3	87.0%	7.1	72.5	81.9%
Arm 2 - A28 Chart Road NE	20.3	87.7	80.8%	17.6	94	82.3%
Arm 3 - A28 Chart Road SW	28.9	31.4	91.6%	21.9	23.3	83.9%
2032 With Dev						
Arm 1 - Loudon Way	10.3	114.7	94.1%	7.3	73.9	82.7%
Arm 2 - A28 Chart Road NE	21.7	87.7	83.0%	23.1	94	84.5%
Arm 3 - A28 Chart Road SW	46.3	65.4	99.7%	25.5	27.5	88.5%
2032 With Dev - With Proposed Mitigation						
Arm 1 - Loudon Way	13.6	96.5	95.0%	10.8	76.4	89.9%
Arm 2 - A28 Chart Road NE	26.7	154.7	90.2%	27.2	128.3	87.8%
Arm 3 - A28 Chart Road SW	58.8	57.9	99.1%	37.8	29.6	91.8%

1.22 ID para 7.49 discusses that the junction model for Tank roundabout has been calibrated using existing peak hour queuing. No evidence of model calibration and data source used is provided for the modelling assessment. A Flat demand profile (even traffic flows across the hour) for the modelling assessment has been used but no justification for this is provided in terms of traffic flows across the peak hour periods.

1.23 The capacity assessment in Table ID7.18: Tank Roundabout does not consider any growth on the network using TEMPro growth figures. It also shows RFC's way in excess of 1 and the junction falling apart, mainly due to CG, which is required to fund delivery of A28 improvement scheme.

1.24 It is my clear view that Tables ID7.19 and ID7.20 for Tank Roundabout show a severe impact on the A28 (NE) Templar Way arm, A28 (SW) Chart Road and Sir Henry Brackenbury Road in the AM Peak and A28 (NE) Templar Way arm and Chart Road East in the PM Peak.

1.25 The County Council has commissioned C&A to undertake further junction modelling of the Tank Roundabout using correct NTS data, TEMPro growth rates, trip rates, trip distribution and assignment. All of this can be found in the spreadsheet. Table 10 below shows the updated modelling results for this roundabout. The baseline intercept values for the arms of the roundabout as set out in my proof of evidence have been used rather than the exit blocking facility that ID uses. This shows a severe impact of the proposals on the Chart Road east arm, A28 Chart Road, Sir Henry Brackenbury Road in the AM peak and Chart Road east arm and Carlton Road in the PM peak.

Table 10: Updated Modelling Results for Tank Roundabout

Arm	AM Peak Hour			PM Peak Hour		
	Queue (PCU)	Delay (s)	RFC	Queue (PCU)	Delay (s)	RFC
2032 Forecast Base						
Arm 1 – Chart Road E	36.5	314.53	1.17	4.5	49.32	0.82
Arm 2 – Carlton Road	15	291.49	1.12	46.1	566.28	1.46
Arm 3 – A28 Chart Road	58.9	127.12	1.06	20.3	55.74	0.98
Arm 4 – Sir Henry Brackenbury Road	22.4	706.08	1.5	1.1	64.02	0.54
Arm 5 – A28 Templer Way	52.5	128.16	1.06	8.8	27.87	0.91
2032 With Dev						
Arm 1 – Chart Road E	53.5	470.16	1.25	23.3	177.24	1.08
Arm 2 – Carlton Road	16	331.06	1.14	74.3	1097.11	1.91
Arm 3 – A28 Chart Road	119.4	278.17	1.15	27.3	69.64	1
Arm 4 – Sir Henry Brackenbury Road	27.3	1251.17	1.55	1.2	68.55	0.57
Arm 5 – A28 Templer Way	63.8	151.94	1.08	11.6	35.91	0.94

1.26 ID is suggesting the installation of MOVA for the existing pedestrian crossing on Chart Road to the west of Tank Roundabout as a mitigation scheme for Tank Roundabout in para 7.57. It has not been demonstrated through any updated junction modelling that this would mitigate the impacts of the development. Furthermore, KCC does not install MOVA on formal controlled pedestrian crossings as a matter of principle. MOVA is used to adjust red / green time on traffic signal junctions to improve the operation of arms of the junction that are under the greatest capacity issue. This cannot be done on a formal controlled pedestrian crossing. There has been no detailed investigation of interaction between the roundabout and crossing facility to support the proposal.

1.27 ID para 7.58 is misleading regarding the dualling scheme. It is a committed scheme associated with the CG development and there is a negative obligation within the S278

Agreement restricting development to 400 units until the bond to deliver it is delivered to KCC.

1.28 The ID assessment on the local highway network and A28 corridor is fundamentally flawed and there is a significant lack of evidence supplied to underpin assumptions adopted. The alternative assessment provided by KCC demonstrates a severe impact of the proposals both on Matalan and Tank roundabouts and the appellants suggested mitigation schemes are not acceptable for the reasons outlined above.

Further matters

1.29 The next section of my rebuttal will focus on all other outstanding issues with ID proof of evidence including sustainability issues. ID para 2.18 discusses post decision discussions that have taken place with KCC. I will comment on these in turn:

- Site Access – This is now resolved in the main, subject to an amendment to the proposed access onto A28 (secondary access), within land which the appellant owns so this can be conditioned if planning permission is granted.
- Trip Generation – Both sets of trip rates have now been used for assessment on the local highway network which is acceptable.
- Journey Purpose – This has still not been resolved as set out above.
- Internalisation – These figures would only be appropriate if District Centre and other facilities at CG are delivered in line with existing Section 106 Agreement and before this development is occupied this appeal site is relying on parts of the District Centre, leisure and non-food retail being delivered for internalisation purposes. KCC still has fundamental concerns with delivery of community infrastructure given the S106B Appeal for the CG site.
- Assessment of Proposed Development – All junctions have now been assessed as set out in my previous consultation responses on the application but because of the wrong inputs the results are wrong. I have corrected the appellants' errors and set out the junction capacity assessments above.

1.30 Table ID3.1 – NPPF – There are fundamental concerns with sustainability of the site given attempt to defer delivery under the S106B Appeal for the CG site. As things stand including with the current pace of delivery at CG, the Appeal Scheme could come forward before any further facilities are provided at CG. As for buses, the trigger for the delivery of the initial bus service there is now proposed as 2,684 dwellings rather than 100 dwellings currently. This does not give any real sustainable transport choice for

residents. The S106B Appeal also proposes to defer delivery of District Centre and leisure uses.

1.31 Table 1D3.2 – NPPF – There are significant concerns with vision for the site given that it relies on CG which is subject to S106B Appeal.

1.32 Table ID3.5: Ashford Borough Council Local Plan – Development is not sustainable for several reasons 1) No bus service currently with CG and Section 106B appeal seeking to defer bus service provision 2) Application seeking deferral of delivery of District Centre from 1,250 dwellings to 2,700 dwellings 3) Consequent isolated location remote from the facilities to be served. I note that ID assumes throughout the delivery of the CG facilities, fails to address the Section 106B appeal, and proceeds on a misconception – he assumes that CG continues to deliver homes thus triggering delivery of facilities but fails to recognise that to get to that point, as things stand, CG will have had to deliver the A28 bypass scheme. The situation he models – CG with facilities but without the A28 dualling cannot arise on the current state of the legal agreements. The issue with lack of delivery of facilities at CG in any timeline tied to the appeal scheme will lead to higher vehicle trip rates from the outset and therefore greater impact on the Local Highway Network.

1.33 Figure ID4.1 Site Location – There is a need to compare the location plan with the wider context plan in my proof of evidence. From that it is self-evident that the A28 is and will be overwhelmingly predominant route for drivers heading towards Ashford Town Centre, railway station and M20.

1.34 ID para 4.12 discusses the vision for the site. The vision is flawed as it is heavily reliant on the CG development coming forward. There has been a very slow build out over several years (360 dwellings over 5 years) and Section 106B appeal to further defer delivery of various commitments.

1.35 ID para 4.19 discusses the CG development. KCC did not object to development there because of the essential and incorporated scheme of obligations to ensure that it was a sustainable new community with the necessary infrastructure including the A28 dualling works to sustain it. The CG development now proposed through the s.106B appeal is a wholly different proposition.

1.36 ID para 4.20 discusses the wider facilities available in CG. The only facilities currently available are the primary school and temporary Community Management Organisation premises and you cannot walk or cycle to either of these from the application site

because there are no dedicated footways / cycleways to these facilities. Provision of other facilities and services is very uncertain due to Section 106B appeal.

1.37 ID para 4.44 discusses the proposed bus service for the site. It is not clear why the suggested service is only half hourly at peak times. This would not be acceptable to KCC as it does not provide an all-day frequent service. The CG initial bus service is proposed as half-hourly through the whole day.

1.38 Figure ID4.4 Indicative Bus Route – This indicative route is not the route that the CG bus service will take. The CG service will route via Tithe Barn Lane, Knoll Lane and Brookfield Road before travelling up Leacon Road. It is not clear if SLR are suggesting a new route or a change to the CG service.

1.39 ID para 4.45 discusses how a bus service could be secured. A contribution would not be appropriate – the service must be provided and subsidised by the developer. Costs have gone up considerably in recent years and KCC is not in a position to fund any shortfall. The example relied on is out of date and not transferrable to the circumstances here. The appellant would have to source their own bus service as per the existing S106 Agreement for CG. The current cost of providing 1 bus is now approximately £220k per annum approximately. There would need to be more than 1 bus on this route although how many is not explained by the appellant. The cost of a single bus is set out in the detailed workings and can be found in Appendix 2. The appellant has not discussed this with KCC's public transport team.

1.40 ID para 4.49 discusses what the appellant will deliver prior to 1st occupation. Nothing is however said about the rest of the District Centre being provided. There is an inconsistency between the assumptions here and the internalisation assumptions and what they assume in terms of delivery of facilities.

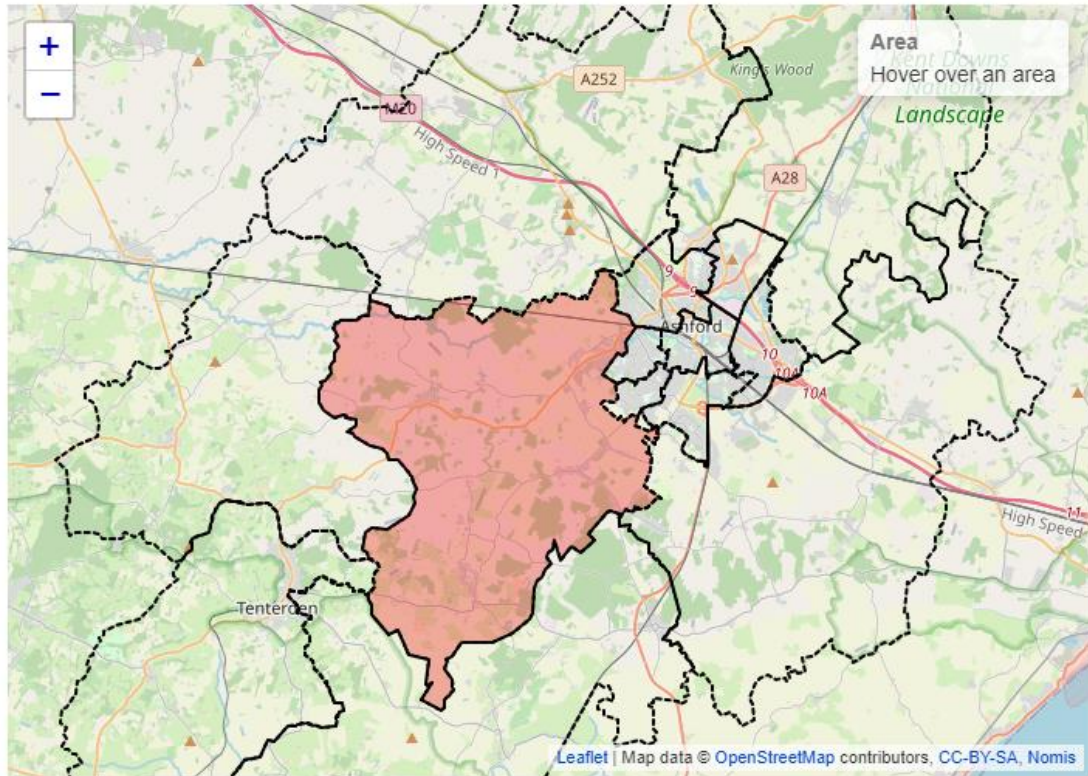
1.41 ID para 4.51 discusses the plans in Appendix ID3 for pedestrians and cyclists to access District Centre. This however involves crossing Chilmington Green Road, but no formal crossing facilities are suggested. This would not be appropriate due to the current design of Chilmington Green Road being a rural road with no street lighting and subject to a 60mph speed limit. As a minimum a toucan crossing would need to be provided across Chilmington Green Road together with improved lighting. The plan also suggests cyclists cycling along Mock Lane which is a narrow country lane with no street lighting and subject to a 60mph speed limit. This is not a safe arrangement for cyclists.

- 1.42 ID para 5.23 is factually incorrect as there is a bus gate served from Carlton Road (east of Tank Roundabout) that taxis can use.
- 1.43 The assumption made in ID para 6.19 of a 10% reduction in proposed traffic levels on local roads is not founded. There is nothing different in this assessment (other than name dropping Vision & Validate) from previous approaches adopted to suggest a further reduction could be achievable given that the latest TRICS assessment is already proposing a lower trip rate than in the TA. No attempt has been made to provide targeted sustainable transport measures to seek to enhance modal shift. The Travel Plan does not suggest free vouchers for residents which would normally be required from the outset to get residents to travel sustainably.
- 1.44 Percentage Impact Assessment - Notwithstanding that the trip distribution/assignment is not agreed, the approach to adopting a 5% threshold is far too crude given that the junctions along the A28 are already at or are at close to capacity.
- 1.45 ID para 6.98 states the following, 'In addition, it is expected that the KCC improvement scheme for the A28 Chart Road will be implemented by the time the proposed development is completed, so the road layout will change compared to what is currently built.' The County Council is still waiting for delivery of the bond from the appellant for KCC to deliver the A28 dualling scheme.
- 1.46 The Travel Plan (TP) is a standard travel plan. It takes a lot of information from the submitted Transport Assessment. It is not clear how do the modal shift targets in the TP relate to the vision for the site. These targets should be focused to maximise mode shift based on assessments of base conditions, likely routes to surrounding destinations and targeted measures to improve these routes. The targets are very generic without any evidential basis. Monitoring strategy should include monitoring of traffic impacts as part of Vision & Validate approach.

Appendix 1: TEMPRo Census Middle Super Output Area (MSOA) Selections

Appellant Assessment

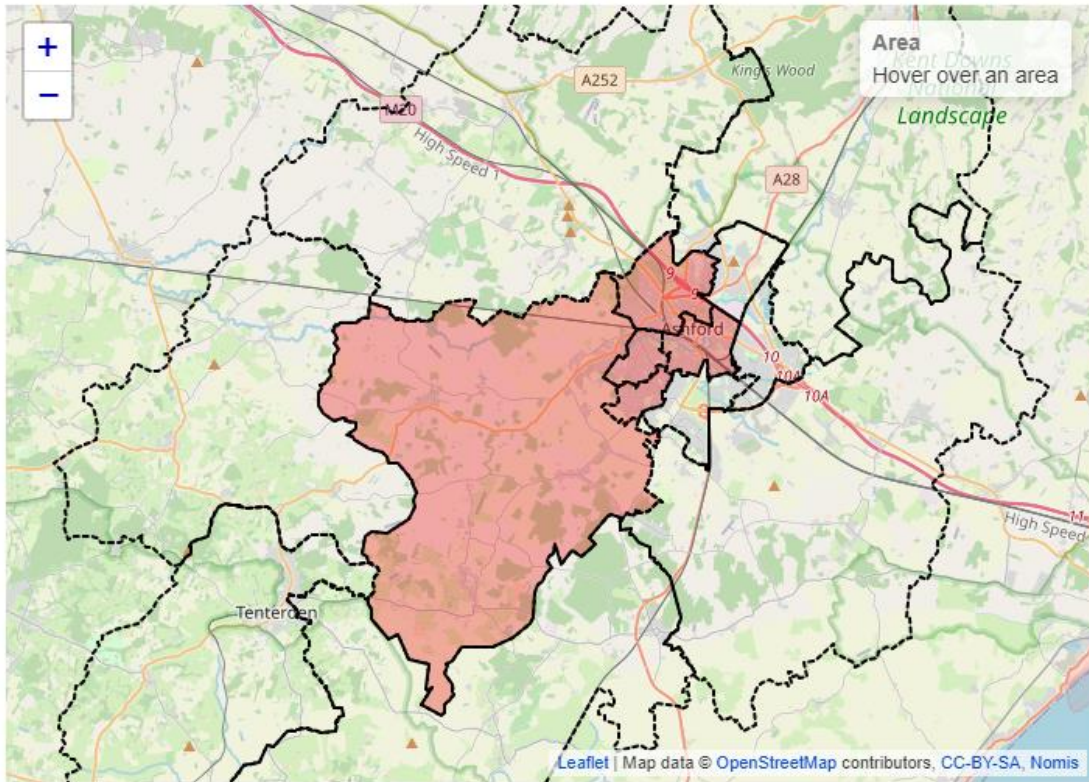
Selection of areas



- E02004996 : Ashford 001
- E02004997 : Ashford 002
- E02004998 : Ashford 003
- E02004999 : Ashford 004
- E02005000 : Ashford 005
- E02005001 : Ashford 006
- E02005002 : Ashford 007
- E02005003 : Ashford 008
- E02005004 : Ashford 009
- E02005005 : Ashford 010
- E02005006 : Ashford 011
- E02005007 : Ashford 012

KCC Assessment

Selection of areas



- E02004996 : Ashford 001 🗑️
- E02004997 : Ashford 002 🗑️
- E02004998 : Ashford 003 🗑️
- E02004999 : Ashford 004 🗑️
- E02005000 : Ashford 005 🗑️
- E02005001 : Ashford 006 🗑️
- E02005002 : Ashford 007 🗑️
- E02005003 : Ashford 008 🗑️
- E02005004 : Ashford 009 🗑️
- E02005005 : Ashford 010 🗑️
- E02005006 : Ashford 011 🗑️
- E02005007 : Ashford 012 🗑️

Appendix 2: Cost of providing 1 bus per annum

Service Description	Typical Example
Option	Hourly
Vehicle type	Enviro 200
Peak vehicles	1
Commencement date	n/a
Date of costing	01-Mar-24

Costs		Assumes a 10-hour day Mon-Sat using one bus	
Drivers	93,499	Assumes £15.50 ph	
Fuel	30,423	At Mar 24: £1.25 pl pre VAT	No BSOG assumed
Tyres	0		
PSV Insurance	7,150		
PSV Depreciation	15,786	Assumes a mid-life bus	
Licences	455		
Ticket machines	1,885		
Other running costs	650		
Engineering materials	10,124		
Engineering labour	7,258		
Traffic wages/salaries	7,758		
Training	532		
Departure fees	0		
Publicity and marketing	1,200		
Uniforms/welfare	269		
Misc costs	0		
Depot/local overheads	22,100		
Central overheads	0		
Total costs	199,090		
Profit margin	19,909	10.0%	
Tender cost	218,999		