

## **Objection to Developer's responses to KCC and SBC officials regarding Application (16/506237/OUT) – 120 homes south of London Road, Lynsted Parish.**

### **Terminology adopted by the Developer's agents**

- ASD are still referring to "Land at Lynsted Lane, **Teynham**, Kent." This is irritating but ultimately irrelevant, now that KCC have shown that they know this is really a Lynsted Parish site and it falls outside Swale Borough Council's Borough Plan.
- ASD continue to describe Lynsted Lane as a "Road". A simple attempt to condition discussion as if it is more than what it is. A very restricted, narrow and twisty thoroughfare - entirely unsuited to urbanisation.

### **Section 1.0 Introduction**

It appears ASD borrows authority from tentative exploratory discussions with KCC a long time ago in the hope that KCC would now rubber-stamp ASD's ideas! This is, of course, pure wishful thinking!

ASD have failed effectively to address the essential limitations of Lynsted Lane to accommodate stationary traffic at or near the junction! Signal controls would create a 'blockage' EVERY time a red light stops traffic on Lynsted Lane. This section of road is largely impassable under such conditions. That is simple geometry and common sense!

### **2.0 Kent County Council Response**

I whole heartedly agree with the KCC's objection to the proposal (20<sup>th</sup> March) regarding the inadequacies of Lynsted Lane, its pedestrian-ways, and impacts on the junction with the A2. KCC rightly rejects as unrealistic any arguments that pedestrian access to services along London Road via the Coffin Path was good enough to overcome the problems of our **narrow country lane**. Real life tells us that people always revert to the shortest routes to the most important services/shops – Lynsted Lane in this case. KCC have made an iron-clad argument that Lynsted Lane is impossible to change to accommodate any more pedestrians or road traffic at its northern end. Any widening of a pavement must lead to worsening traffic congestion along the lane and greater risks from this increased competition for limited space.

ASD argue they **may/might/possibly/perhaps** be able to make 12 new parking places for existing residents of Lynsted Lane within the development with mandatory restrictions to prevent access to residents of the new estate. This idea falls foul of **at least three arguments**:-

(1) people will still park on the street (we see this along the northern edge of the A2 where some homes have parking on Frognaal Gardens to their rear, but prefer to park on the A2 for a number of reasons (e.g. more than one car; infirmity; safety and convenience of getting children in and out of a car; congestion/parking along Frognaal Gardens that seriously impairs line of sight, etc).

(2) The ASD proposal, to be made under what is known as a Transport Regulation Order (TRO) has to be consulted on and there are no guarantees that the existing residents and parish council would agree! Why would they?

(3) New residents may take over these "dedicated" places (as has happened in St Pauls Court, in Lynsted village where there ought to be Church parking spaces! Not anymore!) –so, those living along Lynsted Lane may not be able to take their vehicles off the road, even if they were inclined to!

ASD would also like KCC to 'block' sections of Lynsted Lane from residential parking - forcing them into the new off-road parking spaces (if the new development residents haven't already claimed them!). ASD argues that "other places" that adopt this pattern of "give and take" allows those (undefined) "other places" to accommodate much higher volumes of traffic than Lynsted Lane will face. But ASD ignores the "real world" of Lynsted Lane, which must be analysed on its OWN MERITS rather than being measured against some wildly abstract "other road". What might work in "other places" may not work here and **nothing ASD have said makes me think otherwise!**

ASD's "Technical Report" does actually **accept, on balance**, there is little to be done to improve pedestrian safety for around 100 metres on Lynsted Lane. Instead, they argue there is no danger because no injuries have been reported in the last 10 years. What they would rather not accept is that congested and stationary vehicles tend to make pedestrians double cautious and unlikely to report low-speed impacts from wing mirrors and other body parts!

ASD points to a sign that says **Lynsted Lane is "unsuitable" for HGVs**, and they argue this must mean the lack of these heavy vehicles means a wider pavement might be possible! That is just daft. The sign "Unsuitable for Heavy Vehicles" is **a warning, not a mandation (that would forbid HGVs!)**. The fact is that Lynsted Lane evolved historically as a narrow lane that serves an agricultural community. Our Parish life includes HGVs, tractors and harvesters/fruit transport and packing services as part of everyday life, including HGVs serving Amethyst Nursery, and several cold-stores. Oh yes, and our few remaining buses for those of us without vehicles! Where do cyclists fit in to a road designed to permit vehicles to mount lower kerbs in order to get around each other? Lynsted Lane is also a regular route for traffic across our Parish - HGVs crossing to surrounding villages and other down-land roads, like Newnham Road, Doddington and onwards to the A20. Even domestic vehicles are increasing in width as 'people movers' become increasingly common - so putting greater importance on leaving the pavement as a haven against traffic passing - whatever its speed. None of ASD's argument makes sense.

ASD add, if a pedestrian way was allowed, which was wider but with a lower **"over-runnable" lower kerb** then both people and vehicles could use the full width of the road and pavement! None of this makes sense in real life:

- Pedestrians on lower kerbs could well find themselves being intimidated and squeezed even more by *moving transport* that is permitted to travel along the 'dual-purpose pavement'! This makes no sense and does not make us safer.
- A high pavement kerb, as currently in place at the bottom of Lynsted Lane is essential for pedestrian safety because it means cars are parked off the very narrow pavement. Properly parked cars actually protect pedestrians from the mixed traffic by creating a physical barrier. Rather casually, ASD conclude their idea would be "no worse" than conditions already are, so the idea ought not to be rejected!
- ASD do not address how lower kerbs may also allow easier flooding of cellars in the older buildings along this part of Lynsted Lane - a lane that frequently runs like a river in heavy rain - The George Inn already suffers flood damage at the bottom of Lynsted Lane where there are no raised kerbs to help them.

In short, ASD cannot think of any workable strategy to overcome the fundamental problems associated with the type of development being proposed feeding vehicles and pedestrians onto the A2 end of Lynsted Lane.

ASD then try a lame argument that says that, even if the consultation over the TRO fails, the situation MUST be better because of the 12 parking places. Creating a 'new space' does nothing to address the fundamental "real world" conditions found on Lynsted Lane. Their arguments are patronising.

ASD state that all their ideas "would also present greater opportunities for vehicles to pass, therefore mitigating **any potential issues** resulting from traffic increases on Lynsted Lane." They have tried to scatter about some seemingly random and 'fluffy' ideas that would **prevent** residential parking along bits of Lynsted Lane and force residents to park on land that they have to walk to, cannot oversee for security, cannot reach if they are infirm, cannot safely get their children to their family cars without walking along lower pavements that would now probably be parked on (as happens all along the A2) or being used for passing vehicles! This is utterly unbelievable.

ASD declare that accident statistics show no evidence that this section of Lynsted Lane is dangerous! So, more traffic is not likely to create more danger!! The "real world" of Lynsted Lane as it is today is that residential parking, congestion as vehicles meet each other and poor lines of sight means that vehicles and pedestrians are FORCED into an elaborate slow dance; each gradually edging around the other. The inadequacies of the pavements already mean those with mobility issues or children in buggies have to walk along the carriageway in places. It is **obvious** that congestion allows for only low-speed clips and bumps that will never appear in police statistics. This is our entire problem - the congestion is already dangerous and prone to casual damage/impacts. Allowing large building developments on a small rural lane is never going to be suitable for modern traffic. We have what we have; ASD would have it that because the lane is in such a mess, adding to that mess is not so bad and should be tolerated.....!

ASD are arguing that because they cannot make anything better or safer, the development should be allowed to go ahead anyhow! Instead, they have just confirmed the grounds for **KCC's rejection of this proposal that was based on real-world considerations**. Indeed, KCC has very clearly stated that NO ADDITIONAL PROPOSALS (to those in the Borough Plan) can be considered because of their cumulative impact along the A2 and the strain placed on all junctions now that the Borough Plan has cleared its hurdles.

**"Traffic volumes" and the TEMPro measurements.** KCC's Letter (20th March 2017) acknowledged that levels of traffic in pre-application discussions might have led to an 'open mind' on traffic additions from 120 homes. However, KCC's letter makes it **very** clear that SINCE April/May 2016 the Swale Borough Plan has emerged and so too have all assumptions about the levels of traffic since 14 months ago. ASD try to convince us that the 'limited' impact of traffic volumes from their 120 homes should be ignored as 'minor'. ASD cannot duck the very clear reasons given by KCC for rejecting **ANY** proposal in our area that falls outside the Borough Plan.

ASD has failed to make any new or credible arguments.

**What about impacts elsewhere along the A2?** It is KCC's expert view that any addition of traffic outside the Borough Plan adds to existing burdens found at signalled junctions all along the A2. ASD would have us believe that the range of impact from the Lynsted Lane development falls in the range of 'only' 2.7% and 5.97% and these figures are "extremely modest" and 'acceptable'. What **ASD fails to address** is that KCC have a responsibility to manage safe traffic flows that will already be challenging in light of the Swale Borough Plan. ASD's proposals make worse the problems faced by road-users, cyclists and pedestrians. The ability of roads to cope with high levels of traffic falls off VERY sharply as traffic suddenly reaches a critical point where "friction", leading to congestion and log-jams, will get markedly worse. This is a lesson from

"queuing theory" that explains how very small increases in traffic can have a disproportionately large impact on roads that are already at the top end of their capacity. ASD also try to deflect criticism by pointing to how they will change our hearts and minds about cycling instead of driving between Teynham/Lynsted and Sittingbourne or Faversham. There are precious few cyclists brave enough to face the A2 without resorting to riding along the pavements, which they often do as I know personally from several near misses as we come out of our door straight onto the pavement. We should not forget the tragic death of a cyclist on the Lynsted side of the A2 as a clear warning on how dangerous it is for cyclists including the high pollution levels they have to breathe.

ASD complain that they are "surprised" how firmly KCC has rejected signalising Lynsted Lane! They claim that somehow a 14-month old exploratory discussion (April/May 2016) with KCC should lead to **approval!** ASD has failed to make its case and that is that. ASD adopt a rather simpering language as if 'a promise' might have been made when obviously no such 'promise' was ever made.

KCC have said in their letter, the emergence of the Borough Plan since 2016 changes everything.

Rather lamely, ASD says there is (unspecified) 'potential' for allowing Co-op deliveries outside the junction area if it was signalised. The width of the pavement everywhere else is much narrower, so deliveries would completely block the pavement. Moving the wheeled crates used by the Co-op and other deliveries would be almost impossible on these narrow pavements (which must also somehow accommodate the signalling equipment!). Bear in mind that the bus stop and its important shelter prevents a solution to the West of the Coop; the pavement to the East is impossibly narrow. KCC's letter explains that there are no options for signals and their controller boxes to be mounted on the pavements - the pavements are only just wide enough as matters stand for the infirm, adults with young children in push chairs, anyone with visual impairment, and so on. "Signalisation" here would also present significant additional problems for our local and other Fire Engines and other emergency vehicles serving our local communities.

The rest of ASD's letter looks at the Highways England analysis, which ASD tries again to minimize but fails to make a case against the cumulative impacts across the whole implementation of the Borough Plan between Faversham and Sittingbourne. Highways England focus is on the adverse impacts on junctions with motorways and trunk roads.

ASD, in my view, uses a series of very weak arguments and assertions that change nothing.

Of course, pollution has not been raised in this exchange **with ASD** because that is an SBC competence, not a KCC one. However, it is clear that the technical response on Lynsted Lane developments is intimately tied with the question of pollution, because pollution is intimately tied to congestion and traffic loading.

### **AQMA5 and pollution concerns: Response from "enital" for the Developers to SBC**

SBC officials have considered the revised Air Quality Assessment from the Developers and have found it wanting on several counts. The Developers try to rebut all arguments in a very long technical document that entirely misses the essential point – the Borough Plan EXCLUDES the possibility of development south of the A2. They also concluded that there must be an adverse impact on pollution along the A2 arising from increased traffic. The forecast of 'fewer diesels and cleaner-burning petrol engines is tempered by the **'real world' local circumstances** that arise from the raft of other "in Plan" proposals along the A2 that will make congestion worse, increase the loading from commercial and private vehicles, leading to pollution intensifying! Everything else from the Developers is of secondary importance.

The low velocity of traffic through Teynham/Lynsted (“Greenstreet”) already creates exceedances; ANY significant development adds to this and, at some point, the A2 will reach its capacity when traffic velocity will sharply decline – “queuing theory” explains this phenomenon. These changes will lead to more friction-related PM2.5 pollutants as increased traffic moves more slowly and “stop-starts” more frequently.

SBC already face some very real problems from development sites that **have** been approved for inclusion in the Borough Plan. Any opportunistic greenfield development must add to an already tortured process affecting residents along the A2. I find no comfort from this developer’s response to SBC officials. For example, pollution will be further concentrated by gridlock arising from the proposed roundabout serving the Frogmal Lane development. An **“unintended consequence”** will be that the Frogmal Lane residents and businesses will have priority over all traffic travelling East to West through “Greenstreet”. That traffic will back up into the “Greenstreet Canyon”. The Developers ignore this **aggravating factor** for pollution levels in AQMA5 that is not catered for in ‘averaged’ national statistical models. This roundabout may increase problems in Bapchild too with a ‘ripple effect’ from slower/stationary vehicles negotiating their way into Teynham/Lynsted for Faversham and beyond!

In short, the development ought not to be given any more oxygen and needs to be rejected in order to give some small comfort to residents already concerned by the many sites already identified in the Borough Plan.

Kind regards,

Nigel Heriz-Smith

27<sup>th</sup> June 2017