

Mereworth Parish Council

Representation to the Proposed Tonbridge and Malling Borough Council Local Plan 2011-2031

Regulation 19 Publication Version

Highways and Transportation Synopsis

1. Tonbridge and Malling Borough Council's (TMBC) Local Plan is promoting residential development comprising 900 dwellings on the Broadwater Farm site north of Kings Hill and also 3,000 dwellings on land to the north of Borough Green and Platt which will generate additional vehicular traffic on roads in the vicinity of Mereworth Village.
2. The proposals are likely to lead to an increase in traffic flows along A228 Malling Road of 17% and 23% in the AM and PM peak periods respectively.
3. Similarly, traffic flows will increase by 19% and 14% on B2016 Seven Mile Lane in the vicinity of Mereworth Primary school.
4. Tonbridge and Malling Borough Council has commissioned Mott Macdonald Transport Consultants to assess the impact of the proposals on the local highway network but the increases in traffic flows have been underestimated.
5. In addition, TMBC's consultants suggest junction improvements at location on the A228 Malling Road, B2016 Seven Mile Lane and A26 Tonbridge Road will overcome any additional congestion.
6. However, the Local Plan's assessment fails to recognise that the width of A228 Malling Road in the vicinity of its junction with Kent Street is unable to cope with the existing traffic flows on the route and the additional traffic that will be generated by the proposals for additional housing will exacerbate congestion and poor highway safety.
7. There is no feasible or realistic solution to widen or improve A228 Malling Road to accommodate the additional traffic that will be generated.
8. The transport issues associated with the proposals have not been correctly considered in the Local Plan and therefore the impacts of the proposed development have not been addressed.
9. The environmental impacts of traffic and transport infrastructure have not been identified, assessed and considered.
10. The significant impact from the proposed development in terms of capacity and congestion and highway safety cannot be cost effectively mitigated to an acceptable degree.
11. The proposals have therefore been prepared by a strategy that fails to meet the infrastructure requirements and cannot therefore satisfy the National Planning Policy Framework (NPPF) requirement for soundness, as required by the Ministry of Housing, Communities and Local Government. The NPPF states that "*Transport issues should be considered from the earliest stages of plan-making and development proposals, so that the potential impacts of development on transport networks can be addressed*", which the Local Plan fails to do.