

Opening Statement of Stuart Sharp on behalf of the Castle Street Community

The Castle Street Community fully endorse Medway Council's refusal of Planning Consent for development of the countryside to the West of Upnor Road for the reasons stated in the Council's letter to the appellant dated 28th February 2021,

However, the Castle Street Community along with many others in the villages of Upnor and Lower Upnor consider that the proposed access to and traffic generated by the development would bring about hazardous conditions for all road users and unsustainable traffic levels on local roads and road junctions.

These roads and junctions (and Upnor Road abutting the appeal site in particular), are of historic dimensional and geometric scale and importantly, the tree lined lanes provide a characterful and contextual access route to the ancient village of Upnor.

In addition, the Castle Street Community consider that such traffic levels particularly those generated during morning peak travel periods, would have an adverse capacity reducing impact on junctions connecting the local highway network with the A289 and A228 on the nearby strategic highway network.

153 out of 176 letters of representation or more accurately "letters of objection", submitted to the LPA in response to the planning application referred to Highway Safety, Traffic Generation, Travel and Transport matters of concern. Such unanimity of concern expressed by the local community over highway safety is revealing given the length of experience of local conditions that the majority of those letter writers have. With my tongue in cheek, I compare that level of local experience with the combined total of 2hr 20mins spent on site during daylight hours by the authors of the three (and here I really must thank Mr Wilford for reminding me yesterday that there were in fact three not two submitted Road Safety Audits), of very limited in scope – 2 were submitted in support of the original application and an additional audit was submitted in November 2020 with a proposed amendment to the junction design. It is fair to say that members of our Community, along with I'm sure many others in the locality were shocked when it became apparent that Highway Safety, Pedestrian Safety and Junction Capacity grounds were not

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considered to be of sufficient weight by the LPA and LHA to justify refusal of planning consent on those criteria.

Therefore, the Castle Street Community sought Rule 6 status in order to make the case that there were sufficient grounds for the Planning Application for development of land to the West of Upnor Road to have additionally been refused on Highway Safety, Pedestrian Safety and Junction Capacity grounds.

We shall offer evidence in support of our concerns regarding:-

1. **Traffic Generation** – in particular the
 - Inadequate quantification by mode by the applicant (now appellant) of trips generated by the Children’s Nursery during traffic peak hours. Compounded by -
 - Inadequate scrutiny by both the LPA and LHA of the submitted trip generation calculations by the appellant.

2. Our concern about - **The Inadequacy and Unreliability of the Vehicle Count and Speed Survey Data Sets** that were used to calculate the sightlines to and from the proposed access in that they.....
 - Were carried out at a time of year when the hours of daylight as a %age of the 24hr cycle was less than 40% and average rainfall during February 2020 was almost 300% of the long-term average for the month. The majority of vehicle movements during peak travel hours therefore took place during darkness and poor weather when vehicle speeds would almost certainly have been attenuated. Consequently, the submitted sightline calculations are “questionable” to say the least.
 - As published on the Council’s web site in June 2020, the traffic count and speed data sets in the appendix to the submitted Transport Statement were incomplete. My letter to the LPA dated 15th July 2020, pointed out that only Eastbound data was presented. Westbound and aggregated data was missing and appears never to have been supplied. Only during this last week

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and a little surprisingly, I note from the Core Documents prepared by the appellant that these omissions are perpetuated in the Transport Statement submitted to this Inquiry. Given the importance of this data it begs the questions; "...why was it not noticed or requested by the LPA and LHA in the first place? And why following my letter of the 15th July 2020 was it not rectified?"

- Needless to say that without the provision of realistic and complete data and without a realistic quantification of trip generation for the amended application it is difficult to comprehend how the LPA, the LHA or anyone else for that matter can make a meaningful comparison of generated traffic flows with existing traffic flows and hence, properly analyse the impact of the development on the local and broader highway network.
3. Our concern about - **The Colossal Scale and Incongruity** of the proposed road junction serving the appeal site. It measures 92m wide from the end of the Eastern taper to the end of the Western taper and will be ruinous to the context of the approach to the ancient village of Upnor.
 4. Our concern about - **The Impact on Road and Pedestrian Safety** caused by
 - the sheer size and scale of the proposed junction serving the appeal site in association with
 - the turning movements into and from the site generated by the inadequately quantified vehicle trips and
 - the widening of Upnor Road that research suggests could encourage faster vehicle speeds. All of which leads to.....
 5. Our concern about - **The Discouragement and potential Abandonment of Pedestrian Activity** on Upnor Road that will be the predictable consequence of these sources of hazard. Regrettably it will lead to increased reliance on car journeys that will place yet more pressure on local road junctions as well as to the access junctions onto the A289 and A228.

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6. Our concern about - **Local Road and Road Junction Deficiencies** - my proof of evidence details the deficiencies of local roads and road junctions particularly in terms of poor forward visibility and poor inter-visibility between all road users. These deficiencies are due to non-standard vertical and horizontal alignment of roads, poor sightlines at road junctions and confusing junction layout and priority. The section of Upnor Road into which the proposed appeal site access road will emerge has a substantial gradient rising to the East and there are “blind bends” less than 60m to the East and West of the proposed site entrance. Immediately adjacent beyond the “blind bends” there are unsighted road junctions at Frog(s) Island and at Castle Street. It’s hard to believe that neither the appellant nor the LHA saw fit to specify that the submitted safety audits should analyse the foreseeable adverse impact that the generated traffic from the appeal site would bring to these road junctions.

7. Our concern about - **Broader Network Junction Capacity** – the junctions providing access to the dual carriageway A289 and A228 have restricted capacity due to the lack of proper merging or acceleration lanes. Consequently, moderate levels of delay and traffic queuing during the morning peak hour are already the norm. Since the amended application was submitted, the proposed development of the appeal site will generate significantly more traffic during the morning peak hour than was predicted in the Transport Statement. This traffic when aggregated with traffic generated from other development sites within Upnor and Lower Upnor will have a significant negative impact on the peak hour capacity at these junctions.

In Summary, the Castle Street Community consider that; development of the site to the West of Upnor Road that brings with it its colossal road junction and unsustainable traffic generation.....

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- is not only detrimental to the landscape, ecology, visual amenity and historical context of the area,
- it will generate a hazardous and unsustainable highway environment for all road users including it has to be said, potential occupiers of the appeal site.
- and finally, the proposal offers absolutely zero benefit to the existing community of Upnor in terms of realistic public transport provision, highway safety and pedestrian safety in that the presented benefits are mainly specific to the site.

For these reasons which will of course be expanded upon in my proof of evidence, the Castle Street Community urge that this appeal be dismissed.