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Local Transport Plan
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By email only

Local Transport Plan 5 Response

1. Sevenoaks District Council (SDC) welcomes the opportunity to respond to the draft Local Transport Plan 5.
2. The Council's response will discuss general comments on the priorities of the document, before addressing the local priorities of the Sevenoaks District then raising additional points.
3. Sevenoaks District Council is currently preparing a new Local Plan for Sevenoaks District (Plan 2040) which proposes a sustainability-led Development Strategy. The strategy is split into a three-stepped approach:
 - 1) Firstly, focussing on making the best and most efficient use of land within our existing settlements (i.e. outside of the Green Belt).
 - 2) Undertaking the Duty to Cooperate to establish if there is scope for any of our neighbours to accommodate any unmet need.
 - 3) Assessing Green Belt release in the most suitable and sustainable locations which will need to include consideration of 'grey belt' land, once this is confirmed by the government through the revised NPPF.
4. Plan 2040 was subject to Regulation 18 Part 2 Consultation, which ran for 7 weeks and concluded on Thursday 11 January 2024.

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5. The Council has been analysing responses to policies and sites, following the Regulation 18 consultation. It was anticipated that a Regulation 19 Consultation would take place in Winter 2024/25, with submission to the Planning Inspectorate for Examination before 30 June 2025. A consultation on the NPPF was released in July 2024 proposing a number of significant changes to the NPPF. Once the outcome of the NPPF consultation is known (anticipated to be by the end of the year, or early in the new year), the Local Plan timetable will need to be adjusted. A revised Local Development Scheme (LDS) will be prepared, but it is suggested that submission may move back from mid 2025 to late 2026.

General Comments

6. While Sevenoaks District is not directly affected by a number of strategic proposals, the Council is broadly supportive of the schemes and measures that the LTP5 suggests to improve transport infrastructure within Kent, including a new Lower Thames Crossing and International rail travel returning to Ashford International and Ebbsfleet International stations. All these strategic national measures are important to relieving congestion on the county's main highways for improvements to the local, regional and national economy.
7. The resumption of international rail services stopping at Ebbsfleet and Ashford International stations is particularly supported. Ebbsfleet International Station is located north of the District's border with a neighbouring local authority area and is well connected by the M25 making it a convenient location for our residents to travel to. It is onerous for our residents to travel by Eurostar to France and other European destinations travelling into London first only to travel back through Kent on their way to the Continent. This not only increases the overall journey time but also contributes to rail congestion at peak times. These circumstances make air travel a more appealing and convenient option albeit with higher air pollution. It is unacceptable for London to be the sole beneficiary of the rewards and prestige from the UK's only rail cross-channel connection with Europe.
8. The Council also supports a number of additional measures for improvements to rail and bus services as these provide real alternatives for people to reach destinations of leisure, employment and the use of services within town centres. National Rail has confirmed that 47 stations across the south east will be updated with a contactless payment option, six of which are in Kent. Continued improvements to contactless payment options across the rail network will be required to ensure journeys are smooth and can be continued using the same payment method. Alongside increasing the frequency of rail services, there must be a greater focus on connectivity in timetabling for

onward journeys. Long gaps between train journeys can disincentivise train use. This issue particularly affects our rural train stations leading to missed opportunities to increase rail travel.

9. The recent NPPF consultation has proposed a vision led approach to transport drawing on the 'decide and provide' model. Our NPPF consultation response stated that we consider a vision-led approach can place people and innovation at the forefront of making sustainable places at the earliest stage of plan-making and development proposals. By focusing on desired outcomes, such as reduced traffic volumes and lower emissions, the proposed approach to transport planning can help guide transport planning toward more sustainable solutions and integrate on-site provisions such as electric vehicle car clubs, across sites to develop a sustainable network at the earliest stage. We welcome working with KCC on a 'decide and provide' approach to transport to ensure tangible outcomes from development sites.
10. Improving the electric charging network across Kent is supported and much needed. The Regulation 18 Local Plan proposes a Sustainable Movement Network policy to facilitate sustainable movement across the District. This policy includes support for the improvement of the electric vehicle charging network. The Council's Climate Change Strategy 2024 sets out our priorities to tackle the challenge of climate change. A key priority of the Strategy is 'movement, travel and transport' to encourage the shift to electric vehicles and walking, wheeling and cycling. Electric charging devices are integral to working towards this aim to ensure the necessary infrastructure is in place for electric vehicle drivers.
11. Electric vehicle ownership has steadily increased in Sevenoaks District in the last five years with the District consistently having the largest electric car ownership in Kent (Gov.uk Vehicle licensing statistics data tables, September 2024). The public electric vehicle charging infrastructure in the District is not proportionate to the popularity of electric vehicles ownership. However, Sevenoaks District is a predominantly rural area where the majority of households have access to off-street parking. The Council's Low emission and electric vehicle strategy, 2021 estimates that 67% of households have access to off-street parking. Therefore, most households in the District are likely to have the capacity to charge safely at home. It is noted that the majority of electric vehicle charging occurs privately by owners at home where there is access to a charger as this is convenient and provides the lowest cost option compared to public charging.
12. However, of the remaining 33% of households without access to off-street parking, many do not currently have easy access to a public charging point near their home which acts as a significant barrier to electric car ownership.

Currently, the Council has installed 18 charging points within Sevenoaks District Council owned car parks. A taxi charging point, which is a rarity, has also been installed in South Park. The Council remain committed to installing electric vehicle charging points in Council owned car parks and land. It is recognized that KCC as the Highways Authority has been allocated Local Electric Vehicle Infrastructure (LEVI) funding which will increase the on-street charging infrastructure across the county. Whilst difficulties with government guidance and LEVI funding is acknowledged, progress by KCC to determine how best to deliver the right infrastructure is slow. We will continue to work in partnership with KCC to improve the District's electric charging infrastructure.

Sevenoaks Proposals

13. The Council is broadly supportive of the Sevenoaks District specific proposals and Network-wide proposals identified for the District. These will help to ensure that vehicular traffic is eased, and that public transport provisions and active travel opportunities are explored.
14. The improvements to Bat and Ball junction funding and delivery will be secured by the Sevenoaks Quarry's (planning application 22/00512/OUT) Section 106. There is a resolution to grant planning permission for this development which is imminent. These improvements will be integral to accommodate a significant reduction in queuing, improving traffic congestion and air quality.
15. The Four Elms planning permission (22/00512/OUT) Section 106 has secured improvements to Edenbridge Town Station. This includes a new car parking area for 36 spaces, pick-up and drop-off area, and step-free access ramp leading to the northern platform alongside a financial contribution to improve the station infrastructure. Further improvements to Edenbridge Town and Edenbridge train stations are supported to ensure the train stations are suitable for use and positively affect train journeys.

Strategic Road Network proposals

16. We are pleased to see the M25-M26-A21 east-facing slip remains in both the Sevenoaks and Strategic Road Network Proposals sections, even if only as a watching brief for now.
17. The lack of full on/off connectivity at junction 5 of the M25 has been of general discussion locally since it was first opened in the 1980s. It is not, however, so much an issue about relieving congestion in Sevenoaks town centre, as the plan currently implies. The issue of concern is the volume of

traffic that is forced off the motorway network to use the A25 from Bessels Green through to Wrotham Heath, in both directions. This creates congestion issues in Sevenoaks District at the Riverhead roundabouts, the Bat and Ball junction and through Seal Village which is so narrow at one point that two large vehicles cannot pass each other. Borough Green (in Tonbridge and Mailing) is also greatly impacted by this. Significant housing growth along this section of the A25 will only exacerbate this congestion and the cumulative impact of housing proposals across District and Borough boundaries needs to be monitored carefully at a county level as this could be the trigger to reactive this particular project in the future. Further to this, the proposed slip would remove heavy traffic from inappropriate rural roads from villages (Seal, Kemsing, Otford, Halstead) which are used as a bypass for the busy A225 for traffic travelling east-west.

18. There are some repeated words on page 31 which we wish to highlight for your deletion. The words in italics should be deleted:

“Given past work and lack of progress on the scheme, it is proposed that the scheme be kept *the scheme* under review, to identify any new imperative and critical new drivers for the scheme’s case which would justify National Highways reconsidering the scheme.”

Network-wide Proposals

19. SDC has engaged with KCC as the local transport authority to understand the impact of Gatwick Airport’s proposed expansion. It is agreed that the impact of Gatwick Airport expansion, should the DCO be granted, would be significant and should be a Sevenoaks priority in the Local Transport Plan. However, we take the opportunity to state we are supportive of the project in principle, particularly in relation to the significant economic benefits the expansion will bring to our thriving tourism industry. However, we remain concerned about the negative social and environmental impacts that our communities living in the south of the District, namely Edenbridge, Cowden, Hever, Penshurst and Chiddingstone, will have to endure. We consider that these negative impacts need to be mitigated properly to ensure that our communities’ health, wellbeing and quality of life are not adversely affected in the longer term. In regard to the Gatwick expansion, we take the opportunity to express support for the reinstatement of the Tonbridge to Gatwick (via Edenbridge) rail service to improve rail connectivity to Gatwick Airport and provide a genuine transport alternative to cars.
20. The implementation of the Bus Service Improvement Plan (BSIP) is supported to improve bus journeys provision and experience. The District is substantially

rural in nature with infrequent bus services in rural areas thereby contributing to reliance on private vehicles. The plan acknowledges the challenges rural communities face when travelling and the limited existing bus provision. The BSIP refers to the demand responsive bus service, go2, which Go Coach operates in parts of Sevenoaks District. This innovative demand service offers bus stop to bus stop transport upon request via app booking and telephone booking serving Sevenoaks Town and surrounding settlements such as Shoreham and Westerham. This model of demand responsive buses could be an attractive and flexible model for rural buses where bus services are less frequent and commercially viable compared to urban areas. However, the demand responsive concept is not yet well known or understood, so needs extensive and clear promotion where it is made available.

21. Bus journeys in urban locations are also important, particularly for the elderly and children, to connect residents with daily facilities such as schools, shops and financial and postal services. SDC has taken the opportunity to engage with KCC on the BSIP highlighting the need for affordable and reliable journeys, flexible ticketing options as well as increasing and improving rural services. We will continue to engage with KCC on the implementation of the BSIP subject to funding opportunities.

Active Travel

22. The active travel proposals proposed are supported and have been identified in our Local Cycling and Walking Infrastructure Plans (LCWIPs). There has been an increased drive for active travel within the District recently which we will continue to encourage and progress. There is potential to encourage modal shift for shorter journeys particularly in the District's towns. LCWIPs have now been completed for our two largest towns, Sevenoaks Urban Area and Swanley, and work has commenced on an Edenbridge LCWIP. We want to encourage, more attractive and safe car-free journeys, that will also help to improve local air quality, positively impact the health of our residents, and help to tackle the challenge of climate change.
23. We have been fortunate to receive Active Travel England funding, through KCC, to progress routes identified in the Sevenoaks Urban Area LCWIP. Funding has been secured to deliver the Sevenoaks East-West route which is anticipated to commence later this year. Funding has also been secured to progress feasibility studies and outline designs for two further routes- Route 6- Sevenoaks to Otford (via Seal) and Route 1- Sevenoaks to Otford. Route 1 will progress to detailed design stage. We would welcome the opportunity to further progress these routes and other routes in the LCWIP.

24. Swanley is the second largest town in the District (after Sevenoaks) and is one of four towns within the District which form the top tiers of Sevenoaks District Council's Settlement Hierarchy, recognising the sustainability of these locations. As a result, the emerging Local Plan recognises the potential for growth within Swanley, identifying it as a focus for development. The Swanley urban area LCWIP was completed in February 2024. Six cycling routes, four walking routes, and a core walking zone were identified. These concentrate on Swanley Town Centre and provide links to neighbouring settlements such as Hextable and Crockenhill. The LCWIP focuses on the pedestrian experience which reflects the feedback received from public engagement. The inclusion of walking in Swanley in the Kent Cycling and Walking Infrastructure plan (KCWIP), is supported and will complement the interventions proposed in the Swanley LCWIP. A feasibility study for walking route 4 which connects Swanley Town Centre to Hextable has commenced and we welcome the opportunity to continue to progress planning and design work and walking and cycling interventions.

25. Regarding the KCWIP, whilst acknowledged that this is a county-level strategic document, a greater focus on local connectivity for first and last mile trips can be complementary to ensure accessible and safe access to proposed cycling and walking routes and rail stations to encourage maximum usage. Town and Parish Councils have the insight to provide local knowledge, funding and resources to deliver localised initiatives. These are beneficial so that a route does not just end in a location and is complemented by other measures to ensure a safe journey.

Further Comments

26. The Sevenoaks Initial Baseline Report August 2022 assesses the cumulative impact of the emerging Local Plan's proposed development on key roads and junctions, including the Strategic Road Network. The Stage 1 baseline work established the current state of congestion on the highways network, and the state of congestion at 2040 with existing growth. The model has been used to test the three potential growth options (which were consulted on at Regulation 18), to understand their impact on the road network. The model has been developed by Jacobs, who have produced a county-wide model for KCC and the results shared with National Highways.

27. This Report describes the methods used to develop the Initial 2040 Forecast Baseline and approach taken to identify the key junction and link "hots spots" in Sevenoaks district. Overall, the 2019 AM and PM outputs present similar locations of junction and link "hot spots". The majority of the junctions

exhibiting junction level of service (LOS) E and F (the two worst LOS levels), or links displaying unstable flows (>85%) or which are over capacity (>100%), are located along:

- M25 J3 (Swanley interchange connecting the M25 with the M20)
- B258 and B2173 High Street and B2173 London Road in Swanley Town
- A20 Main Road / A225 Dartford Road in Farningham
- Pembroke Road / A225 High Street / Suffolk Way in Sevenoaks Town
- A25 Bradbourne Vale Road & Seal Road and the A225 Otford Road & St John's Hill (Bat and Ball junction) in Sevenoaks Town
- B2026 / Stangrove Road in Edenbridge Town
- B2026/Station Road in Edenbridge Town

28. The next stage of the transport modelling work is to test the 'preferred scenario' and consider detailed junction modelling and mitigation. We highlight this for KCC's attention to ensure that infrastructure provisions in the LTP5 will support and consider our planned growth.
29. The Swanley interchange is important to the strategic road network as it serves a crucial connection between two major motorways, the M25 (London's orbital route) and the M20 (which connects London to the Kent ports and the Channel Tunnel). However, the draft plan has not highlighted this junction as an area of concern which is an oversight. Due to the strategic role it serves, this junction often faces capacity issues contributing to delays, increased journey times, and frequent traffic bottlenecks. M25 Junction 3 is a congestion hotspot, particularly when there are issues with the Dartford crossing, and traffic is frequently backed up to Junction 3 and beyond, causing rat-running through the surrounding area, including Swanley and adjacent villages, and also potentially inhibiting future development in the area. This issue is recognized as a key constraint for Pedham Place, a potential standalone settlement in the Regulation 18 Local Plan, 2023. Junction modelling work is ongoing by the Council and site promoters to resolve this issue.
30. Furthermore, the lane signage painted on the road for junction 3 is in dire need of improvement and clarity. Clear and accurate signage is essential to guide drivers to make timely decisions, avoid confusion and accidents. The current signage is confusing and often itself conflicting for example, in one lane after an exit, it shows signage for both a 'straight ahead only sign' and a 'turn left only sign'. This need has been identified by National Highways and their contractors who are working on a broader program to improve the M25, which includes efforts related to lane signage and road safety at various junctions, including Junction 3.

31. Whilst it is noted that Highways England are responsible for managing highway drainage and drainage ditches on major trunk roads, including M25, M26, M20, A20 and A21, we take the opportunity to raise concerns for the stretch of A21 between Morley's roundabout/bottom of Riverhill going to Southborough. This is outside of our District boundary but is heavily used by our residents, especially by many of our secondary school children. This section of the A21 is severely affected by flooding, standing water and drainage issues, especially during periods of heavy rain, leading to a number of recent accidents, road closures and disruptions.
32. Active Travel England recognizes that small interventions can have a significant impact by improving road safety. By focusing on measures like improved crossings and better signage at junctions, they aim to make walking, wheeling and cycling safer and more accessible. A good example of this is the need for a pedestrian crossing at the top of the Vine/Dartford Road in Sevenoaks to improve pedestrian safety. These relatively minor adjustments, can create safer environments for pedestrians and reduce accidents.
33. In regard to the Sevenoaks map on page 73, we suggest the following points of clarification in italics to the text:
- Amend "Gatwick expansion – opposition due to noise disturbance" to "Gatwick expansion – KCC opposition due to noise disturbance"
 - Amend "Bat and Ball junction" to "Bat and Ball junction *improvements*"
 - KCWIP text.
 - Amend to "KCWIP proposed *a walking zone in Swanley aiming to provide improved access to the town centre, the rail station, journeys to schools...*"
 - Sevenoaks cycle route text:
 - Amend to "*Sevenoaks Urban Area LCWIP sets out a cycle network for Sevenoaks with Route 1 and 5...*"
 - Remove reference to suburbs

Yours sincerely,
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