FORTIS IBA
RIDHAM DOCK

Transport Statement

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1 INTRODUCTION

1.1 This Transport Statement (TS) has been prepared by RPS, on behalf of Fortis IBA Ltd, in support of a full planning application for the proposed development of an Incineration Bottom Ash (IBA) recycling facility at Ridham Dock, to the north of Sittingbourne, in Kent.

1.2 IBA is characterised as non-hazardous waste and typically comprises a combination of glass/aggregate/clinker and ash from the Energy from Waste (EfW) burning process. This ensures that more waste is recycled and diverted from landfill.

The Site

1.3 The proposed development site is located within Ridham Dock, to the north of Sittingbourne, east of Sheppey Crossing and south of the Isle of Sheppey. It is currently situated on vacant brownfield land. It is bounded by The Swale to the north and east, and open fields to the south and west. The location of the site is illustrated in a local context on **Figure 1**.

1.4 The application site is within Ridham Dock and is currently accessed via the southwest corner of the site. The site connects to the wider highway network through a private road (Ridham Dock southern access road) to the south, which links to Barge Way, leading to the A249 and Sittingbourne. It is also accessed from the west via a private road (Ridham Dock western access road) which connects to a public road (Ridham Dock Road) which then links to the A249 Sheppey Crossing via Old Ferry Road, providing access to the Isle of Sheppey. Both points of access connect the site to the Strategic Highway Network.

1.5 The application site has extant consent for a car shredding facility which previously generated HGV's, LGV's and cars, further details of which are in **Section 2**.

Development Proposals

1.6 The proposed development is to build an IBA recycling facility which will import 400,000 tonnes per annum (tpa) of IBA to be processed as well as exporting the resulting output of 360,000 tpa of Incinerator Bottom Ash Aggregate (IBAA) / metals. 50,000 tpa of the IBAA / metals to be exported will be via Ridham Dock. All IBA imports will occur via the strategic highway network by HGV as will the remaining exports of IBAA / metals not being exported via Ridham Dock.

1.7 Access to the proposed development will be taken from the existing access at the southwest border of the development site.

1.8 The Site Masterplan is shown at **Appendix A**.

Scope of Statement

1.9 This Transport Statement has been prepared in line with the National Planning Policy Framework (NPPF), published by the Department of Communities and Local Government (DCLG) in 2019, and Planning Practice Guidance (PPG): Travel Plans, Transport Assessments and Statements in Decision-Taking, published by the DCLG in 2014. Local planning policies have also been considered.

1.10 This report details the transport considerations of the proposed site and is divided into the following sections:

- **Section 2** – Existing Situation - describes the existing conditions at the site and surrounding transport network. It focuses on the accessibility of the site by non-car modes and also describes the surrounding highway network;
- **Section 3** – Development Proposals - outlines the proposed development;
- **Section 4** – Transport Policy and Guidance – reviews the local and national transport planning policy;
- **Section 5** – Trip Generation, Modeshare and Assignment - Outlines the number of daily trips generated by the proposed development, as well as the additional number of trips and their assignment onto the wider public highway network;
- **Section 6** – Transport Impact – Assesses the additional trip generation generated by the proposed development; and
- **Section 7** – Summary and Conclusions - summarises and concludes on the findings of the Transport Statement.

1.11 The report concludes that there are no transport related reasons for not permitting development.

2 EXISTING SITUATION

Introduction

2.1 This chapter outlines the existing highway and sustainable transport network available in the vicinity of the proposed development site.

2.2 It considers the site location and the existing local highway, pedestrian, cycle and public transport networks, with particular regard to the accessibility of the site in relation to public transport stops and local service provision.

Site Location

2.3 The proposed development is located within Ridham Dock, to the north of Sittingbourne in Kent, as shown in **Figure 1**. It is bounded by The Swale to the north and east, and open fields to the south and west. The Kemsley SEP is located approximately 2km to the south.

2.4 It is accessed via the existing access in the southwest corner of the site which leads into Ridham Dock. Ridham Dock is accessed from the west via the private Ridham Dock western access Road and the private Ridham Dock southern access Road.

2.5 The application site currently has extant consent for a car shredding facility.

Site History

2.6 The application site has extant consent for use as a Car Shredding Facility, having previously been granted planning permission in 2004, planning ref: SW/03/1331. The site operated until 2016, when the facility closed and the site was cleared. The site is currently a vacant industrial brownfield site.

2.7 The car shredding facility could become fully operational once more under its extant consent and can recommence at any time. The Planning Application Form for the extant consent detailed the access arrangements and trip generation. There were no highway objections to the previous permission including the highway access arrangement and the transport movements. The trip generation of the extant consent in terms of HGV's, LGV's and cars is detailed in **Section 5**.

2.8 An application for the erection of an additional building for the storage and distribution of imported cement and the installation of 3 new cement storage silos and weighbridge (18/502717) was approved in April 2019. The permission overlaps a portion of the proposed development application site.

2.9 The application site has recently had an application for remediation works (SW/18/505828) approved by the council in March 2019. The application proposed decontamination of the site with ground to be made good to a standard suitable for future development.

2.10 Irrespective of the approved application for the ground to be made good suitable for future development, due to the nature of the equipment used for the extant consent, the Car Shredding Facility remains able to recommence and become fully operational at any time. The vehicle movements associated with the extant consent continued until recently into 2016.

Highway Network

2.11 The application site is located approximately 4km north-east of Sittingbourne and circa 1-2km from the A249.

2.12 The application site is accessed from its south western corner through a gated access. This connects the site to the Ridham Dock. Ridham Dock is accessed from the west via the private Ridham Dock western access road, and from the south via the private Ridham Dock southern access road.

2.13 The private Ridham Dock western access road is a private road which is single track and has passing places. It has a 20mph speed limit, no parking restrictions and no street lighting. The private Ridham Dock western access road connects to Ridham Dock Road at the bridge under Sheppey Way. The bridge has a height restriction of 14 foot 6 inches. It is a single carriageway road under the national speed limit and has no parking restrictions. Through the Ridham Dock Road, the Ridham Dock western access road connects the application site to the wider highway network of Old Ferry Road and onto the A249.

2.14 The private Ridham Dock southern access road is a single carriageway road which has a 40mph speed limit and no parking restrictions. It has streetlighting and a combined footway / cycleway intermittently along its length. The private Ridham Dock southern access road forms the northern arm of a four-arm roundabout with Barge Way. Barge Way continues west as a public highway and forms the eastern arm of a four-arm roundabout with Fleet End which provides access to a Morrison's distribution centre. Barge Way continues south from this roundabout to form the northern arm of the three-arm roundabout with Swale Way, which again has been designed to be a 4-arm roundabout. It is a 7.3m wide single carriageway road with street lighting and a combined footway / cycleway on its northern / western sided; it is subject to a 40-mph speed restriction and there are no parking restrictions.

2.15 Through Barge Way, the private Ridham Dock southern access road connects the application site to the wider public highway network through Swale Way which forms part of the Sittingbourne Northern Perimeter Road providing access to the surrounding residential and industrial areas of Sittingbourne. Swale Way also connects the site to the A249 and the B2005 Grovehurst Road junction.

2.16 The A249, which can be accessed from the application site via both the private Ridham Dock western and southern access roads, connects the application site to the wider Strategic Highway Network. It is part of the trunk road network and it routes broadly north to south between the Isle of Sheppey and Maidstone respectively. It forms grade separated junctions with the B2006, A2, M2 and M20 and provides access to London, the M25.

Pedestrian and Cycling Infrastructure

2.17 The application site connects to the local pedestrian and cycling networks through Ridham Dock and the private Ridham Dock western and southern access roads.

2.18 Along the private Ridham Dock western access road there is an informal footway which links to public footpaths ZR88 and ZR90. These footpaths connect to the pedestrian infrastructure along Old Ferry Road and Sheppey Way and joins the site to the Swale Railway Station and bus stops located on Sheppey Way.

2.19 The Ridham Dock southern access road has a combined footway / cycleway along the majority of its length. It connects to the combined footway / cycleway along the northern and western sides of Barge Way and along the southern and south-western sides of Swale Way. These link to the residential streets in the immediate vicinity of Swale Way, which in turn provide access to the wider residential areas of Sittingbourne. These residential streets generally have footways on both sides of the carriageway; therefore, a good network of footways allows pedestrians to route between Ridham Dock and the surrounding residential areas.

2.20 The Saxon Shore Way is in the vicinity of the application site and is a long-distance footpath which follows the shore of The Swale to the east of Ridham Dock. The footpath continues north towards Chertney Marshes and to Gillingham. To the south it links into Sittingbourne and continues east towards Faversham. The route is not lit and is not generally surfaced.

2.21 There is a combined footway / cycleway which connects the application site to Sittingbourne through the private southern Ridham Dock access road. Along the private western Ridham Dock access road cyclists are required to cycle on the carriageway.

2.22 The application site is within close proximity to on and off-road cycle routes which link to the wider Kemsley and Sittingbourne area. The National Cycle Network Route 1 is located circa 2.5km to the south west and passes along the B2005 Grovehurst Road between Sittingbourne and Kemsley. It is a long-distance cycle route connecting to Faversham and Canterbury in the east and Chatham and Gillingham to the west. National Cycle Network Route 174 is located approximately 1.5km to the west of the application site and routes on Sheppey Way linking to the Isle of Sheppey. It also connects to Route 1.

2.23 The local roads which connect to the site via the private Ridham Dock Access Roads provide a range of routes to surrounding areas, linking to Routes 1 and 174 of the National Cycle Network. The routes also provide access to local public transport.

Public Transport

Bus

2.24 The closest bus stops are located on Sheppey Way, approximately 1.5km west of the application site, and is served by bus service number 334 which provides a direct link to Sittingbourne. The service operates two buses per hour during the weekdays and Saturday.

Table 2.1: Bus Services and Frequencies

Number	Operator and Route	Service Frequency (per hour)				
		Weekday			Weekend	
		AM Peak	Off Peak	PM Peak	Saturday	Sunday
334	**Arriva Kent and Surrey** Sheerness - Iwade - Sittingbourne - Detling Hill - Maidstone	1	2	2	1	No Service

Source: Traveline (October 2019)

2.25 Additional bus stops are located on Ridham Avenue and include the 347 which provides a bus frequency for 4 buses per hour at the stop during weekdays and Saturdays. Bus trips from the Kemsley stop to Sittingbourne take approximately 20 minutes.

Train

2.26 Swale Railway Station is located approximately 1.5 km west of the application site, with Kemsley Railway Station being located approximately 3km to the south west on Grovehurst Road. Southeastern Trains operate all services from both stations.

2.27 Swale Railway Station has services to Sittingbourne and Sheerness-on-sea. These services are approximately two per hour in each direction. The journey time from the Railway Station to Sittingbourne and Sheerness-on-Sea is circa 8 minutes.

2.28 Kemsley Railway Station has some direct services to London Victoria with a service frequency of two trains per hour during the weekday morning with a journey time of approximately one hour and twenty-five minutes. Additional half-hourly services are available to London Victoria which require a change at Sittingbourne.

2.29 Kemsley Railway Station has access to far more frequent train services via Sittingbourne Railway Station, with services from Kemsley approximately every 20 to 30 minutes and a journey time of 4-6 minutes, Sittingbourne Railway Station has frequent train services to London Victoria, London St Pancras International, Ramsgate and Dover Priory.

Road Safety

2.30 Personal Injury Accident (PIA) data has been obtained from Crashmap for the latest available five-year period, for the period between 1 January 2014 and 31 December 2018.

2.31 The study area included the private Ridham Dock Western and Southern Access Roads together with Barge Way, the Ridham Dock Road and Swale Way which links the site to the wider highway network. The PIA reports are attached at **Appendix B**.

2.32 Of the 7 injury accidents, there were no fatalities, two injury accidents resulted in serious injuries and 5 injury accidents resulted in slight injuries.

2.33 Both serious injury accidents occurred at the junction of Lloyd Drive and Swale Way. The injury accidents had different contributory factors. The first injury accident was a head-on collision between two cars in darkness with rain and high winds; street lights were present and lit. The second occurred in darkness with fine weather; a motorcyclist was hit whilst turning right into Lloyd Drive when a car was egressing from the junction.

2.34 There were no clusters of injury accidents and the analysis of the those that occurred within the study area suggests that driver error was the main reason for the incidences and was the common contributory factors amongst them. It is therefore, considered that there are no existing road safety issues in the vicinity of the site on the local road network.

Air Quality Management Areas (AQMA)

2.35 The Department for Environment, Food and Rural Affairs website (http://aqma.defra.gov.uk) has been accessed to ascertain whether there is an AQMA within the vicinity of the site. There are no AQMA at the application site in Ridham Dock in the local vicinity.

Summary

2.36 This section has demonstrated that the application site at Ridham Dock has access to a range of sustainable travel options, as well as links to public transport services to the wider area. This section has also shown that there are no road safety issues within the vicinity of the application site.

3 DEVELOPMENT PROPOSALS

Introduction

3.1 This section describes the proposed development of a new IBA recycling facility at Ridham Dock. The IBA recycling process is described with a view to setting out predicted net vehicular movements associated with the proposals generated onto the public highway.

3.2 The site layout plan is shown in **Appendix A**, with the site in the context of the local area shown in **Figure 1**.

IBA Production

3.3 IBA is generated from the combustion of residual municipal waste. This is a by-product of the incineration process and is classified as non-hazardous waste. IBA is the fraction of waste produced by the EfW which is non-combustible and typically contains a variety of materials including glass, brick, rubble, ceramics and metals.

3.4 The proposed IBA recycling facility will be located within Ridham Dock, to the north of Sittingbourne, and will also be situated just north of the Kemsley Sustainable Energy Plant (SEP) in Sittingbourne. The proposed development will have a throughput capacity sufficient of up to 400,000 tonnes per annum (tpa). IBA will be processed to remove the metals and to produce a useful secondary aggregate product that can be used in the construction industry, ultimately preventing waste going to landfill. IBA is recognised as a resource which can be recycled into safe and useable aggregate products. The proposed IBA recycling facility ensures that more waste is recycled and diverted from landfill. Therefore, the development would provide considerable environmental, sustainability and economic benefits.

General Layout

3.5 The internal layout will be of functional and practical design, and will operate efficiently, effectively and safely. The buildings are sited to create the necessary functional circulation for vehicles to enter and depart the application site in forward gear. Parking for staff is provided close to the office block at the west of the site in a compound for 18 cars. This will provide sufficient parking for the number of staff travelling by car on each shift, including shift change over periods, together with visitors to the site. There is no parking for HGV's as there will be no such demand.

3.6 Access is proposed from the existing gated access road located in the south-west corner of the application site, as demonstrated at **Appendix A**.

Kemsley Sustainable Energy Plant (SEP)

3.7 The Kemsley Sustainable Energy Plant (SEP) was granted planning permission in March 2012 (planning ref: SW/10/444) and is currently under construction. Under the existing programme of construction, it is due to be completed and operational by late 2019.

3.8 The Kemsley SEP was granted consent with the inclusion of an IBA recycling facility and also obtained a separate consent for an IBA recycling facility on adjacent land, however it is understood these are not being progressed.

3.9 The proposed development will import the IBA from the Kemsley SEP. This would ensure that vehicles associated with the export of IBA for recycling use the Barge Way roundabout and the private Ridham Dock southern access road to process IBA at the proposed development application site. This will reduce the number of vehicle movements through key junctions such as the Grovehurst roundabout and also reduce the number of vehicles accessing the strategic highway network from both the proposed development and the Kemsley SEP due to the symbiotic relationship between the Kemsley SEP and the proposed development site.

3.10 If the proposed development is not in place then the IBA produced from the SEP would be dispatched by HGV's, to be processed, through the strategic highway network.

3.11 In terms of daily HGV movements for the export of IBAA the Kemsley SEP is currently permitted for:

- Maximum annual export of IBAA: 165,000 tonnes;
- Average HGV load of 20 tonnes;
- Giving 8,250 HGV's per annum or 16,500 HGV movements per annum;
- Ash removals Monday – Friday and Saturday morning (5.5 days per week or 278 days per year); and thus
- Average of 58 HGV movements per day (29 movements Saturday).

3.12 The trip generation for the Kemsley SEP in relation to the export of IBA is shown in **Section 5**.

Wheelbrator Kemsley North Waste to Energy Facility

3.13 The Wheelbrator Kemsley North (WKN) waste to energy facility is currently at the pre-examination application stage of the development consent regime for Nationally Significant Infrastructure projects.

3.14 It is currently planned for the proposed development to import IBA from the WKN waste to energy facility. As with the Kemsley SEP, this would form a symbiotic relationship between the proposed development and the WKN waste to energy facility. Therefore, subject to planning approval, this would reduce vehicle movements through key junctions such as the Grovehurst roundabout accessing the local strategic highway network.

3.15 Construction for the WKN waste to energy facility is expected to begin in Q1 2021 and last 40 months with the start of operation being in 2024.

Proposed Operational Details

3.16 The proposed development will have a processing capacity of 400,000 tpa of IBA, of which 137,500 tpa of IBA will come from the permitted Kemsley SEP. It should also be noted that of the 400,000 tpa of IBA, 97,000 tpa of IBA is planned to be imported from the WKN waste to energy plant, which is planned to be situated just to the north of Kemsley SEP.

3.17 The proposed development will also generate 360,000 tpa of IBAA / metals to be exported, of which 50,000 tpa of IBA will be exported via Ridham Dock to Ipswich via Barge.

3.18 The processing of IBA would take place 24 hours a day, seven days a week. These hours are required in order to process IBA from Waste to Energy plants which operate 24 hours a day, seven days a week.

3.19 It is likely that on the majority of occasions HGV movements would be during daytime periods Monday to Friday and on Saturdays, there may also be some HGV movements during early evening periods. Therefore, permission is sought for HGV movements for 6 days per week, 304 days per year, from 06:00 to 19:00 on a weekday and from 06:00 to 19:00 on a Saturday.

3.20 Staff numbers will be 6 people per shift, with three shifts throughout 24 hours. The three 8-hour shifts will take place from 06:00 to 14:00, 14:00 to 22:00 and 22:00 to 06:00.

3.21 The processing capacity, operating hours and vehicle load capacity have been used to estimate the potential trips generated by the proposals for a typical weekday and a Saturday. The number of HGV movements associated with the development are discussed in **Section 5**.

3.22 The proposed development is intended to process the 137,500 tpa of IBA produced by the Kemsley SEP as well as 97,000 tpa from the planned WKN waste to energy plant. Thus, ensuring there are less HGV movements relating to the processing of IBA generated through the strategic highway network.

3.23 58 HGV movements associated with the IBA recycling facility from the Kemsley SEP are already permitted on the wider highway network in accordance with the respective planning permission.

Heavy Goods Vehicle Routing

3.24 The proposed development will import IBA and export IBAA / metals via HGV, with the exception of the 50,000 tpa of IBAA / metals which will be exported via Ridham Dock to Ipswich via Barge. HGV's will all enter and depart the site from the south via the private Ridham Dock southern access road.

3.25 HGV's will be directed to enter and depart the site via the private Ridham Dock southern access road. This will ensure all HGV's travelling to and from the site will enter via the A249, through the Grovehurst roundabout, along Swale Way and continue north at the Barge Way / Swale Way roundabout, entering the site from the south.

Construction and Decommissioning

3.26 When the Proposed Development is constructed and decommissioned, the process will generate associated vehicle movements, including HGV movements.

3.27 The vehicle movements generated by the construction of the proposed development are temporary; therefore, the impact of these elements of the development on the highway network is temporary. When the proposed development is operational, there will be regular staff vehicle and HGV movements at the application site which will be in excess of the vehicles required for its construction.

3.28 In terms of demolition, since there is no further use for the materials, such materials can be removed in bulk after demolition. This means that larger payloads can be achieved, and the traffic flows associated with decommissioning will be lower than those during its construction.

4 TRANSPORT POLICY AND GUIDANCE

4.1 This section summarises the relevant national and local transport policy which sets the policy context for the report.

National Policy

National Planning Policy Framework (NPPF)

4.2 The National Planning Policy Framework (NPPF) was updated in February 2019 and sets out national policy for delivering sustainable growth and development. The updated NPPF replaces the previous National Planning Framework published in March 2012 and revised in July 2018. The NPPF aims to make the planning system less complex and more accessible. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. In terms of transport the objectives outlined in NPPF are set out in paragraph 102:

"Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

a) the potential impacts of development on transport networks can be addressed;

b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;

c) opportunities to promote walking, cycling and public transport use are identified and pursued;

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places."

4.3 When determining planning applications, Paragraph 108 of the NPPF states it should be ensured that:

"a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users; and

c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."

4.4 Paragraph 109 states:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

4.5 Having regard to the above objectives, the proposed development's access and movement will ensure that the development is connected to the adjacent community and sustainable travel network.

Planning Practice Guidance: Travel Plans, Transport Assessments and Statements in Decision-Taking

4.6 Planning Practice Guidance – Travel Plans, Transport Assessments and Statements in Decision-Taking (PPG) was published in March 2014 and provides a concise report on the use and importance of Transport Assessments / Statements and Travel Plans. With regard to whether to provide a Transport Assessment, Transport Statement or no assessment, the guidance states:

"Local planning authorities, developers, relevant transport authorities, and neighbourhood planning organisations should agree what evaluation is needed in each instance."

4.7 The guidance states that Transport Assessments / Statements and Travel Plans can positively contribute to:

- "encouraging sustainable travel;
- lessening traffic generation and its detrimental impacts;
- reducing carbon emissions and climate impacts;
- creating accessible, connected, inclusive communities;
- improving health outcomes and quality of life;
- improving road safety; and
- reducing the need for new development to increase existing road capacity or provide new roads."

4.8 The guidance states that Transport Assessments / Statements and Travel Plans should be proportionate to the size and scope of the proposed development, be tailored to particular local circumstances and be established at the earliest practicable possible stage of a development proposal.

4.9 The guidance continues by stating that these reports should be brought forward through collaborative ongoing working between the Local Planning Authority / Transport Authority, transport operators, Rail Network Operators, Highways Agency and other relevant bodies.

4.10 The vehicle movements generated by the construction of the proposed development are temporary; therefore, the impact of these elements of the development on the highway network is temporary. When the proposed development is operational, there will be regular staff vehicle movements and HGV movements at the Site.

4.11 As the PPG states that Transport Assessments / Statements and Travel Plans should be proportionate to the size and scope of the proposed development, a Transport Statement has been prepared to consider the transport related effects associated with the proposed development.

Circular 02/2013: The Strategic Road Network and the Delivery of Sustainable Development

4.12 Circular 02/2013: The Strategic Road Network and the Delivery of Sustainable Development was published by the Department for Transport in September 2013. The Circular sets out the way in which the Highways Agency (now Highways England) will engage with communities and the

development industry to deliver sustainable development and economic growth whilst safeguarding the primary function and purpose of the strategic road network.

4.13 Circular 02/2013 replaces Circular 02/2007 and 01/2008. Circular 02/2013 states that 'the Highways Agency supports the economy through the provision of a safe and reliable strategic road network, which allows for the efficient movement of people and goods.' Similarly, to the NPPF, Circular 02/2013 states that 'development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

Local Policy

4.14 National policy on transport and land use establishes broad policy objectives that reflect the Government's aspirations for integrating land development and transport. The role of local government is to develop strategies based on specific local social and spatial requirements, which deliver the national aspirations.

4.15 Local strategy with respect to land use and transport is articulated in statutory documents prepared by planning and highway authorities which, for this development, comprises of:

- Vision for Kent 2012 – 2022;
- Growth without Gridlock;
- Kent Corridors to M25 Route Strategy Evidence Report;
- Local Transport Plan for Kent 2016 – 2031;
- Kent Minerals and Waste Local Plan;
- Swale Local Plan; and
- The Swale Transportation Strategy 2014 – 2031.

Vision for Kent 2012 – 2022

4.16 This is a countywide strategy for the social, economic and environmental wellbeing of Kent's communities. It has been written around three major ambitions:

- To grow the economy, by supporting businesses to be successful including improvements to the transport network and the provision of high-speed broadband;
- Tackling disadvantage, by fostering aspiration rather than dependency including the provision of comprehensive reliable and affordable public transport services providing access to education and employment opportunities; and
- To put citizens in control, by involving people in the making decisions and working with them to design services that meet their needs and suit them.

Growth Without Gridlock

4.17 Growth without Gridlock is the county's 20-year plan for essential transport improvements and innovative funding solutions to support the substantial growth planned: 23,000 new homes and 40,000 new jobs by 2021. The Plan calls for greater transport funding and delivery powers for local transport authorities and calls on the Daft to progress those schemes of national

importance, including a third Thames Crossing, a long-term solution to Operation Stack, improvements to the M2/ A2 corridor and a scheme of foreign road user charging.

Highways Agency – Kent Corridors to M25 Route Strategy Evidence Report

4.18 The A2/ M2 corridor forms part of the Trans European Transport Network (TEN-T) and is one of the gateways to Europe. Traffic flows at the western end of the route as it approaches the M25 are almost 140,000 vehicles per day. In the length of the M2 between Faversham and Sittingbourne, traffic flows are approximately 20,000 vehicles per day. The volume of goods vehicles is reasonably constant between Dover and Sittingbourne at approximately 3,000 per day.

4.19 The A249 between the A2 and M2 carries the lightest traffic flow of the strategic road network but has a low rate of journey time reliability. There is consistently significant delay on the M2 between junctions 6 (Faversham) and 5 (Sittingbourne).

4.20 Junction 5 (Sittingbourne) and 7 (Brenley Corner) of the M2 are in the top 50 worst crash sites on the strategic route network. Lengths of route in Swale with poor crash records are:

- M2 J6 to J7 coast bound;
- A249 southbound between A2 and M2; and
- A249 Brielle Way, Sheerness.

4.21 The condition of the carriageway on the M2/ A2 corridor is considered to be severely degraded in both directions between J5 (Sittingbourne) and Canterbury. The majority of the A249 north of the M2 will reach the end of its design life by 2020. There are gaps in the remote monitoring of motorway incidents, CCTV and Variable message signing on the M2 between junctions 5 (Sittingbourne) and 7 (Brenley Corner).

Local Transport Plan for Kent 2016 – 2031

4.22 The preparation and submission of a Local Transport Plan (LTP) is a statutory requirement of all local transport authorities in England. An LTP sets out the authority's policies and delivery plans for managing and improving the local transport network. The government's Guidance on LTPs (July 2009) made clear that they should reflect and support Local Plans and that, in two-tier areas, county councils should work closely with districts to ensure alignment between these documents and ensure that the transport implications of development proposals are identified and mitigated at an early stage in the planning process.

4.23 KCC's strategic approach for Kent's fourth Local Transport Plan (LTP4), covering the period 2016 to 2031, stems from the following ambition for Kent:

"To deliver safe and effective transport, ensuring that all Kent's communities and businesses benefit, the environment is enhanced and economic growth is supported."

4.24 This ambition will be realised through five overarching policies that are targeted at delivering specific outcomes. These outcomes are:

- "Outcome 1: Economic growth and minimised congestion;
- Outcome 2: Affordable and accessible door-to-door journeys;

- Outcome 3: Safer travel;
- Outcome 4: Enhanced Environment;
- Outcome 5: Better health and wellbeing."

4.25 Transport Priorities for Swale with relevance to the proposed Sites include:

- "The A249 / Grovehurst Road junction;
- Extension of the Northern relief road to the A2 and then M2;
- A249 corridor capacity enhancements to support growth;
- Improvements to Key Street junction;
- Improvements to M2 Junction 5 – funding committed by Highways England;
- Improved transport connections to and from major centres of employment in the borough."

4.26 The local transport plan highlights that the A249 provides a primary north, south route for Kent. Capacity issues at M2 Junction 5, where the A249 meets, is acting as a major barrier to growth in the Borough. Highways England is currently evaluating options to improve the M2 J5 and consultation with the wider public on final proposed options is proposed for early 2017.

4.27 It also states that a corridor study of the A249 is needed to define what improvements to the principal junctions (Grovehurst, Key Street and Bobbing) will be required to support the new allocations in the Local Plan, with the A249/Grovehurst Road Junction already identified.

Kent Minerals and Waste Local Plan

4.28 The Kent Minerals and Waste Local Plan 2013-30 is the strategic document which sets out the vision and delivery strategy for mineral provision and waste management in Kent. The Plan is formed of core strategic policies and monitoring implementation framework, as well as development management policies against which any proposals for minerals and waste development will be assessed. The Plan makes provision for the ensuring a ready and sustainable supply of minerals to meet construction and industrial requirements and the sustainable management of all wastes arising in Kent which will support the principles of the UK Government's waste hierarchy.

4.29 Currently a review is being undertaken that will cover two key aspects of the adopted Kent Minerals and Waste Local Plan 2013 - 2030, the Waste Sites Plan and the Minerals and Waste Safeguarding.

4.30 The Kent Minerals and Waste Local Plan (KMWLP) identified a shortfall in waste management capacity over the Plan period to be met, in part, by development on sites allocated in a Waste Sites Plan. Early work on the Waste Sites Plan included a reassessment of waste management requirements which suggests that the identification of sites within a separate Waste Sites Plan is no longer justified. One of the main reasons for the change in position is that additional significant waste recovery capacity is now under construction that will mean there will no longer be a shortfall in such capacity. To regularise the position, modifications to the KMWLP are now therefore required.

4.31 The reviewed Kent Minerals and Waste Local Plan is currently in submission following its consultation period and following the independent examination hearings and inspectors report in 2019 the Plan is timetabled to be adopted in January 2020.

4.32 Policies of relevance to the application include Policy CSW6 which states that, in relation to transport that planning permission will be granted for uses identified as appropriate to the site allocated in the Waste Sites Plan providing that they are:

"are well located in relation to Kent's Key Arterial Routes, avoiding proposals which would give rise to significant numbers of lorry movements through villages or on unacceptable stretches of road."

4.33 The guidance also includes Development Management Policies including DM 13 which states that, in terms of the transportation of minerals and waste a development that require road transport, it will be required that they demonstrate that:

"The proposed access arrangements are safe and appropriate to the scale and nature of movements associated with the proposed development such that the impact of traffic generated is not detrimental to road safety;

The highway network is able to accommodate the traffic flows that would be generated, as demonstrated through a transport assessment, and the impact of traffic generated does not have an unacceptable adverse impact on the environment or local community;

Emission control and reduction measures, such as deployment of low emission vehicles and vehicle scheduling to avoid movements in peak hours. Particular emphasis will be given to such measures where development is proposed within an AQMA."

4.34 In conclusion the Kent Waste and Minerals Local Plan through policy DM 15, the safeguarding of transport infrastructure states that proposals will be granted planning permission where:

"Development would not give rise to unacceptable impacts on aviation, rail, river, sea, other waterways or road transport or where these impacts are mitigated."

Swale Local Plan

4.35 The Swale Borough Local Plan is a key planning document for Swale, setting out the vision and overall strategy for the area and how it will be achieved for the period from 2014 to 2031. The Local Plan was adopted in July 2017.

4.36 The local plans overarching vision for the transformation of the borough is:

"to transform its economic, social and environmental prospects, making it one of the best places in Britain in which to live, work, learn and invest."

4.37 Policy DM 6 – Managing transport demand and impact – states that development proposals generating a significant amount of transport movements will be required to support their proposal with the preparation of a Transport Assessment (including a travel plan) which will be based on the councils most recent strategic modelling work. The highways Agency may also require a Transport Assessment if the development is deemed to impact on the strategic road network.

4.38 It also highlights that development proposals should be sustainable, avoid a new direct access onto the strategic or primary distributor route network, integrate air quality management and

environmental quality, and where traffic generation leads to a decrease in safety or is in excess of capacity of the highway network, improvements will be required.

4.39 The new Swale Borough Local Plan sets out the strategy for the Borough, including the achievement of sustainable development (Chapter 4). The chapter also includes a key diagram which indicates broad locations for growth, protection and enhancement:

- a series of core policies that take important issues for Swale and create the necessary linkages with the policy themes, set out in national planning policy and other local plan policies (Chapter 5);
- details of allocations, the identification of regeneration areas, a neighbourhood plan and an area of search (Chapter 6);
- a framework of development management policies to guide the determination of planning applications by setting out criteria for development proposals (Chapter 7); and
- a framework for implementation and monitoring of the Local Plan. Chapter 8 sets out the issues affecting the delivery of the Local Plan, whilst a separately published Implementation Delivery Schedule details the infrastructure necessary to support the Local Plan.

The Swale Transportation Strategy 2014-2031 Draft

4.40 The transportation strategy for Swale is a comprehensive document looking at the issues regarding transport in Swale and potential solutions to these. It does this in line with national and local policies, which are set out within the policy context. The transportation action plan is structured into four main sections, with each section supported by actions and outcomes, linked to the Borough's ambitions:

- Encouraging sustainable travel;
- Improvements to transport infrastructure;
- Alternative access to services; and
- Road Safety.

4.41 Several key transport challenges are identified for Swale with those relevant to the Sites listed:

- Congestion at M2 junction 5 acts as a barrier to further development on Swale;
- Capacity improvements required at A49 Key Street and Grovehurst interchanges;
- Public transport tends to be inaccessible for the mobility impaired;
- Traffic congestion with school / employment commuting into Sittingbourne, causing rural rat runs in the south of town, and air quality issues;
- Transport interchange between cycle routes, bus services, and train services is poor, therefore encouraging the use of cars to rail stations, which add to problems with parking and congestion; and
- Constrained viability of new development to provide significant infrastructure contributions.

4.42 The success of the strategy will be measured objectively against the following target indicators:

- Traffic volumes at specific location;

- Number of journeys to work by car;
- Mode share: walking cycling and bus;
- Bus timetable reliability;
- Number of people killed and seriously injured; and
- Vehicle emissions.

4.43 Target 1 states to maintain traffic flows at key locations, in relation to the Sites it states that Grovehurst Road traffic flows should be maintained at 15,400 vehicles per day.

4.44 For employment and other non-residential development, where considered appropriate, the Borough Council will expect the submission of a Travel Plan (as part of a Transport Assessment) alongside the planning application, in accordance with the relevant County Council SPG on such matters.

4.45 Any provision or financial contribution sought will be secured through a planning condition or appropriate legal agreement.

Policy Consideration

4.46 It is considered that the proposals are generally in accordance with policies relating to transport and highways at the national and local levels since there are walking and cycling facilities to the development site as well as public transport services nearby. Additionally, the development site is well located in respect to the strategic freight network.

5 TRIP GENERATION, MODESHARE AND ASSIGNMENT

Introduction

5.1 This chapter of the report considers the trip generation of the proposed development and the net change in vehicle movements generated by the proposed development in relation to the extant consent on the application site and the Kemsley SEP IBA recycling facility permitted vehicle movements.

5.2 The trip generation has been derived from first principles from knowledge of the likely shift patterns, hours of operation and processing capacity discussed in **Section 3**, provided by the project team.

5.3 The trip generation in relation to the net change of the introduction of the proposed development site is laid out within the chapter in different sections. These sections set out the methodology for calculating the net change in vehicle movements, and thus the new vehicle movements generated by the proposed development.

5.4 These sections are summarised below:

- Extant Consent Vehicle Movements – sets out the vehicle movements currently consented at the application site, which will be considered against the proposed development trip generation.
- Permitted Kemsley SEP IBA Recycling Facility Vehicle Movements – sets out the vehicle movements for the permitted IBA recycling facility included as part of the Kemsley SEP, which will be considered against the proposed development trip generation.
- Proposed Development Trip Generation – sets out the vehicular trip generation for the proposed development prior to calculating the net change in vehicle movements and to inform the new additional vehicle movements upon the public highway network.
- Daily Net Change – sets out the daily net change in vehicle movements of the proposed development considered against the extant consent and the permitted Kemsley SEP IBA recycling facility to calculate the new additional vehicle movements generated onto the public highway network by the proposed development.

Extant Consent Vehicle Movements

5.5 The vehicle movements associated with the extant consent on the application site are detailed to inform the net change calculations regarding the new vehicle movements generated on the highway network by the proposed development.

5.6 The trip generation for the extant consent for the application site has been formed from the vehicle movements provided from the planning application form which accompanied the previous planning application, which was granted in 2004 (planning ref: SW/03/1331) for a car shredding facility. These vehicle movements were accepted by Highways Officers as part of the granted planning permission application. This is previously outlined in **Section 2**.

5.7 The planning application form for the planning application also stated the working hours of the site, from 07:00 to 19:00 on a weekday and 07:00 to 13:00 on a Saturday.

5.8 The vehicle movements were based on existing information from the car shredding previously in operation on the site and are shown in **Table 5.1** below.

Table 5.1: Extant trip generation

Vehicle Type	Number of Vehicles visiting site per day	Number of Vehicle movements per day
Cars	15	30
Light Goods Vehicles (LGV)	10	20
Heavy Goods Vehicles (HGV)	50	100
Total	**75**	**150**

5.9 **Table 5.1** shows that the total two-way daily vehicular movements for the car shredding facility were 150 vehicles per day. It also shows that of the 150 total two-way daily vehicle movements, 100 of these were from HGV's.

Permitted Kemsley SEP IBA Recycling Facility Vehicle Movements

5.10 The permitted vehicle movements associated with the Kemsley SEP IBA recycling facility is detailed to inform the net change calculations regarding the new vehicle movements generated on the highway network by the proposed development due to the proposed development importing IBA from the Kemsley SEP IBA recycling facility.

5.11 The Kemsley SEP was granted planning permission in March 2012 (planning ref: SW/10/444) and is currently under construction. Under the existing programme of construction, it is due to be completed and operational by late 2019. Once operational the Kemsley SEP will produce 137,500 tpa of IBA, based on current estimations.

5.12 In terms of daily HGV movements for the export of IBAA / metals the Kemsley SEP, in relation to its IBA recycling facility, is currently permitted for:

- Maximum annual export of ash / aggregate: 165,000 tonnes;
- Average HGV load of 20 tonnes;
- Giving 8,250 HGV's per annum or 16,500 HGV movements per annum;
- Ash removals Monday – Friday and Saturday morning (5.5 days per week or 278 days per year); and thus
- Average of 58 HGV movements per day (29 movements Saturday)

5.13 Therefore, the IBA recycling facility incorporated as part of the Kemsley SEP has consent for 58 HGV IBAA / metals export movements per on a weekday and 29 HGV movements on a Saturday.

5.14 The project team has calculated that 137,500 tpa of IBA will be exported from the Kemsley SEP to the proposed development site. Using the project teams' calculations and assumptions,

detailed in the Proposed Development Trip Generation section of this chapter, 41 HGV IBAA / metals export movements are predicted to be associated with the 137,500 tpa of IBA. Therefore these 41 vehicle movements, which are associated with the export of IBAA /metals from the Kemsley SEP, are comparable to the 58 vehicle movements currently consented. Thus the 41 HGV movements in relation to the export of IBAA / metals have already been assessed as part of the Kemsley SEP planning permission.

5.15 The Kemsley SEP IBA recycling facility will not be progressed, therefore these vehicle movements will instead be diverted to the proposed development.

Proposed Development Trip Generation

5.16 The operational trip generation for the proposed development site is detailed below. These vehicle movements form part of the net change calculations in relation to the new vehicle movements the proposed development will generate onto the public highway network.

5.17 The trip generation set out below is not the number of new additional vehicle movements that will be generated onto the public highway network.

HGV's

5.18 As stated in **Section 3**, the proposed development will import of 400,000 tpa and export of 310,000 tpa via road. The average HGV load for imports is 27 tonnes and the average HGV load for exports is 20 tonnes. Therefore, per annum, the proposed development will require 14,815 HGV's for imports and 15,500 HGV's for exports. Assuming a 304-day working year for the proposed development and a 278 day working year for the permitted Kemsley SEP and WKN waste to energy plant, the number of HGV's required per day for imports will be 51 and the number of HGV's required per day for exports will be 51.

5.19 Therefore, in terms of the movements of HGV's, there will be 102 two-way HGV movements for imports and 102 two-way HGV movements for exports. In total the proposed development will generate 205 two-way HGV movements per day.

Staff

5.20 18 staff will be employed across a 24-hour period, operating in 3 shifts of 6 employees.

Operational Mode Share

5.21 To estimate the likely mode of transport that employees would use to travel to and from the site, the 2011 Census Journey to Work data has been analysed for the Workplace Population Workplace Zone in which the site lies (E33043316). The workplaces within this zone include Ridham Dock as well as the other employment units, all of which have similar levels of accessibility and shift patterns and is thus reasonably representative for assessment purposes for the proposed development.

5.22 The Workplace Population Census data is set out in **Table 5.2** and has been applied to the level of staff to predict the level of vehicle trip generation for the site.

Table 5.2: Staff Modeshare

Mode	% Mode Share
Car Driver	84.8
Car Passenger	4.9
Bus	0.4
Train	1.5
Motorcycle	2.6
Pedal Cycle	3.1
Walk	2.6
Other	0.0
Total	100

5.23 The Census data predicts that 84.8% of staff will arrive at the site as a car driver, 4.9% would arrive as a car passenger, 3.1% would arrive by bicycle, 2.6% would arrive on foot and 1.5% would arrive by train.

5.24 On the basis of the above and staff on rest days due to shift patterns, it is estimated there would be a maximum of 15 staff arriving and departing via car per day to the proposed development.

Operational Temporal Distribution

HGV's

5.25 HGV movements would be generated throughout the day, from 06:00 to 19:00 on a weekday and from 06:00 to 19:00 on a Saturday, they would typically be spread equally in terms of hourly movements. Deliveries would take place on weekdays and Saturdays, there may be infrequent peaks of HGV movements at various times of the day however these would be balanced by subsequent troughs. Thus, an average day would result in a fairly equal number of HGV's per hour across the day.

5.26 Therefore, an assumption of a flat profile throughout the day maximises the number of HGV movements during the highway network peak hours and therefore generates a robust assessment.

Staff

5.27 Staff arrivals and departures have been based upon estimates by the operator. The staff will operate in 3 shifts throughout the day and consist of 6 staff per shift. The three-shift work pattern will be in operation over 24 hours a day, seven days a week.

5.28 Based upon the information set out above, a breakdown of the operational traffic flows associated with the movements of the proposed development is shown in **Appendix C**. **Appendix C** details the spread of vehicle movements across a typical weekday and Saturday, in terms of arrivals and departures per hour.

Daily Proposed Operational Trip Generation

5.29 The total proposed typical weekday vehicle movements of both cars and HGV's, are summarised in **Table 5.3**. The movements shown in **Table 5.3** are not the additional vehicle movements onto the highway network and are prior to the net change calculations.

Table 5.3: Proposed Development Weekday Daily Trip Generation (prior to net change)

Vehicle Type	Number of Vehicles arriving per day	Number of Vehicles departing per day	Number of two-way Vehicle movements per day
Cars	15	15	31
Heavy Goods Vehicle (HGV)	102	102	205
Total	**118**	**118**	**235**

Note: Figures may not sum exactly due to rounding.

5.30 **Table 5.3** shows that on a typical weekday there would be a total of 118 vehicles arriving and departing per day. In terms of two-way vehicle movements there would be 235 vehicle movements of the course of the day, of which 205 are HGV movements.

Summary

5.31 The trip generation for the proposed development prior to the net change calculations, has been detailed in terms of daily movements as 235 two-way total vehicle movements. It is important to note that this figure is not the number of new additional vehicle movements generated by the proposed development.

5.32 In order to assess the additional vehicles generated by the proposed development the extant consent trip generation and the Kemsley SEP permitted vehicle movements have also been detailed.

6 TRANSPORT IMPACT

6.1 This TS assesses the effects of the development proposals as a whole in terms of the net change in daily vehicle movements and the impact of any new additional vehicles on the wider highway network.

6.2 To consider the effects of the traffic generated, an assessment of traffic flow increases and decreases has been undertaken to provide a context of the net change in traffic considering the extant consent, Kemsley SEP and planned WKN against the proposed development of the IBA recycling facility.

Daily Vehicle Movement Net Change

6.3 **Section 5** detailed the trip generation of the new additional vehicles generated by the proposed IBA facility, after taking into account both the extant consent and the Kemsley SEP permitted vehicle movements.

6.4 The application site is not currently in use however the extant consent of the car shredding facility could be recommenced without the need for new planning permission. Thus, the vehicle movements of the proposed development must be considered against the 150 vehicle movements permitted at the application site as part of the extant consent.

6.5 The vehicle trips associated with the Kemsley SEP IBA recycling facility have been assessed and approved in accordance with the respective planning permission. The proposed development IBA recycling facility will effectively act as a replacement for the Kemsley SEP IBA recycling facility, with the IBA to be processed diverted to the proposed development. Therefore, the 41 permitted HGV movements in relation to the Kemsley SEP recycling facility have already been accounted for on the network and should be excluded from the proposed development trip generation calculations when assessing the impact of the proposed development upon the public highway network.

6.6 Therefore, the extant consent and the Kemsley SEP IBA recycling facility permitted vehicle movements, in relation to the application site and proposed development respectively, are vehicle movements already permitted on the public highway network. The net change in vehicle movements is thus to be calculated in order to assess the new additional vehicle movements generated by the proposed development compared to those vehicle movements already permitted.

6.7 **Table 5.1** shows that the extant use of the site as a car shredding plant would generate 150 two-way vehicle movements a day, 100 of which are HGV movements. The permitted movements of the Kemsley SEP IBA recycling facility in relation to the proposed development are detailed previously in **Section 5** as 41 two-way HGV movements.

6.8 **Table 5.3** shows that the proposed development would generate 235 two-way vehicle movements a day, 205 of which are HGV movements.

6.9 **Table 6.1** summarises the extant consent vehicle movements, the Kemsley SEP IBA recycling facility permitted vehicle movements and the proposed development daily vehicle movements, as well as detailing the net change in daily vehicle movements. The net change shows the net increase in vehicle movements when the extant consent and the Kemsley SEP permitted vehicle movements are compared against the proposed development vehicle movements. Therefore,

the net change details the new additional vehicles on the public highway network which require assessment.

Table 6.1: Net Change Daily Vehicular Trip Generation

Vehicle Type	Number of Two-way Vehicle movements per day		
	Extant Consent and Permitted Kemsley SEP Vehicle Movements	Proposed Use	Net Change
Cars	30	31	+1
Light Goods (LGV)	20	0	-20
Heavy Goods (HGV)	141	205	+64
Total	**191**	**235**	**+45**

6.10 **Table 5.4** shows that over the course of the day there will be a total two-way net change of +45 vehicle movements, including an increase of 1 car movements, a decrease of 20 LGV movements and an increase of 64 HGV movements.

6.11 Therefore, taking into account the car shredding facility extant consent and the Kemsley SEP IBA recycling facility permitted vehicle movements, the total additional daily vehicle movements generated by the proposed development are a net change of 45 two-way new vehicle movements.

6.12 This level of vehicle movements throughout the day would not result in a severe impact on the local highway network or an unacceptable impact on highway safety.

6.13 It is worth noting that, subject to planning approval, 97,000 tpa of IBA is planned to be imported from the WKN waste to energy facility. Using the project teams' calculations and assumptions, as previously detailed for the proposed development in previous chapters, 26 HGV IBA import movements are predicted to be associated with the 97,000 tpa of IBA. Therefore these 26 HGV movements are accounted for in the WKN waste to energy facility application. Subject to planning approval this would lead to a total net change of +19 two-way vehicle movements, including an increase 38 HGV movements for the proposed development once the WKN waste to energy facility becomes operation (currently estimated as 2024).

Road Safety

6.14 **Section 2** sets out that there are no existing road safety issues within the vicinity of the proposed development site.

6.15 The proposed development would generate cars and HGV's in a similar way to the current road users in the vicinity and would use the private Ridham Dock southern and western access roads to enter and exit the proposed development site.

6.16 Therefore, there is nothing to suggest that the proposed development would alter the injury accident rates within the vicinity of the proposed development site. It is therefore considered that the proposed development would not result in an unacceptable impact on road safety.

Summary

6.17 The analysis of the proposed development trip generation has shown that the net increase of 45 two-way daily vehicle movements would not compromise the highway capacity of the local highway network.

6.18 The application site is currently not in use however the application site does have extant consent for a car shredding facility and could be recommenced without the need for new planning consent.

6.19 The results of the analysis demonstrate that the proposed development will not have a severe impact on the local highway network.

6.20 The NPFF states in paragraph 109:

"Developments should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

6.21 The analysis based on the assessment work has demonstrated that the proposed development would not result in a severe residual cumulative impact on the road network or an unacceptable impact on highway safety.

7 SUMMARY AND CONCLUSIONS

7.1 This Transport Statement (TS) has been prepared by RPS, on behalf of Fortis IBA Ltd, in support of a full planning application for the proposed development of an Incineration Bottom Ash (IBA) recycling facility at Ridham Dock, to the north of Sittingbourne, in Kent.

7.2 This Transport Statement has been prepared in accordance with the National Planning Policy Framework (2018) and Planning Practice Guidance 'Travel Plans, Transport Assessments and Transport Statements'.

7.3 The proposed development is located within Ridham Dock, to the north of Sittingbourne, east of Sheppey Crossing and south of the Isle of Sheppey. It is currently situated on vacant land. It is bounded by The Swale to the north and east, and open fields to the south and west.

7.4 The proposed development will utilise the existing access at the south west corner of the site. It will be accessed from the private southern Ridham Dock access road, through Barge Way and the private western Ridham Dock access road, through Ridham Dock Road.

7.5 The route between the site and the A249 includes Swale Way and Barge Way to the south with Ridham Dock Road and Old Ferry Road to the west. These roads have been designed to carry mixed industrial traffic and are provided with off-road shared pedestrian/cycle paths to link to the surrounding residential areas.

7.6 Analysis of road safety data shows there are no road safety issues within the vicinity of the site.

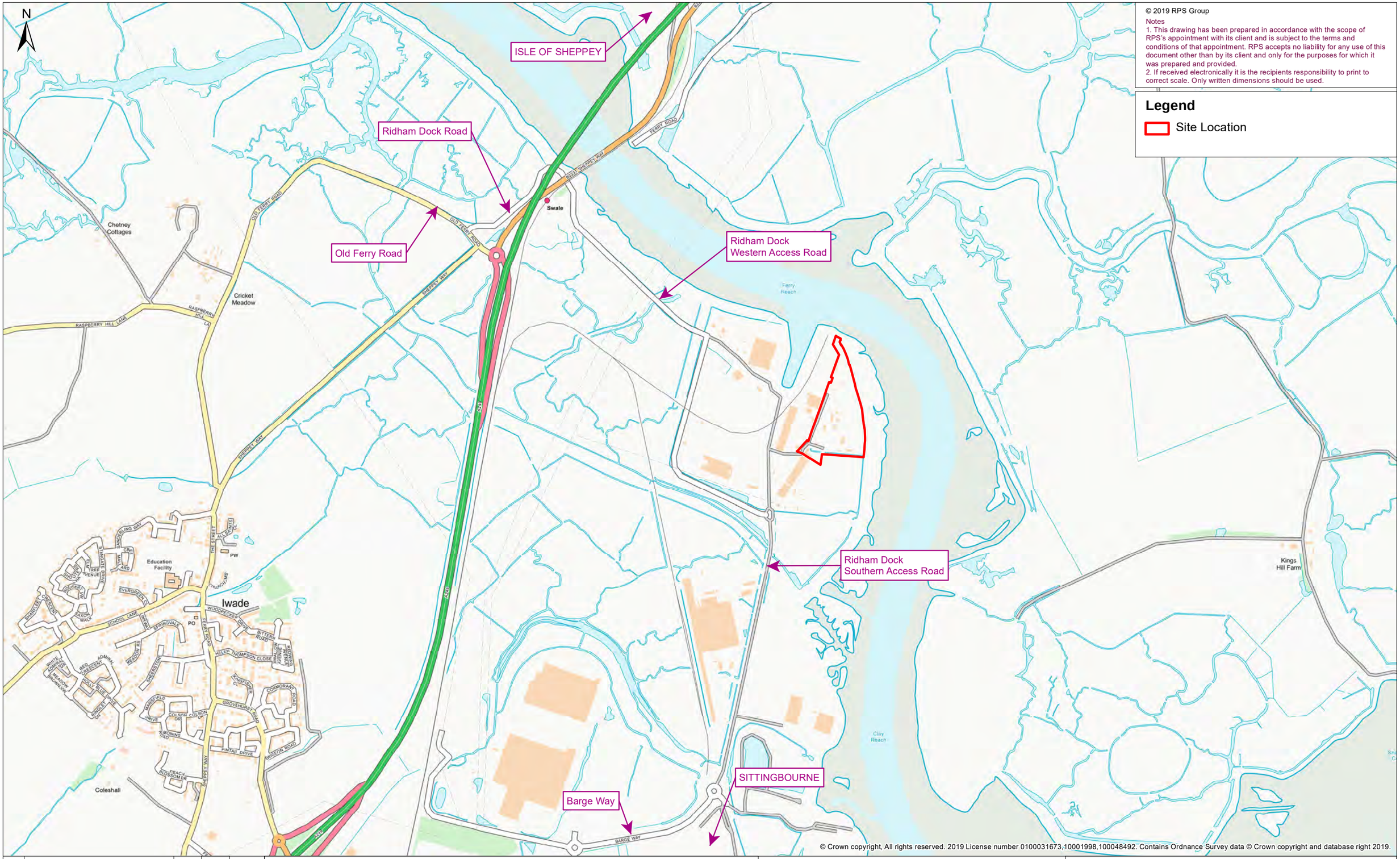
7.7 The proposed development site will import IBA from the permitted Kemsley SEP site. The application site also has extant consent to operate as a car shredding facility with daily HGV generation which could recommence at any time. As such the additional new vehicle movements generated by the proposed development have been assessed on the public highway network, taking into account the net change in vehicle movements.

7.8 From the analysis of the traffic volumes and impact it is considered that the additional vehicle movements generated by the proposed development would not result in an unacceptable impact on highway safety or result in a residual cumulative impact on the road network that is severe.

7.9 In conclusion, the site can achieve a safe and suitable means of access for all modes, and the development will not have a severe residual cumulative impact on the road network.

Figures

Figure 1 – Site Location Plan



Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

Legend

Site Location

Rev	Description	By	CB	Date

Figure Number: 1 | Rev: -

rpsgroup.com

Client: FORTIS IBA Ltd

Project: Ridham Dock

Title: Site Location Plan

0 250 500 m

Status	Drawn By	PM/Checked By
FINAL	CR	CM
Project Number	**Scale @ A3**	**Date Created**
JNY10115	1:12,000	MAY 2019

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MAKING COMPLEX EASY

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Appendices

Appendix A – Site Masterplan

INSET

IBA STOCKPILE
5,660sq m IN STOCKPILES 8m
HIGH, 40° ANGLE OF REPOSE

IBA STOCKPILE
9,600sq m IN STOCKPILES 8m
HIGH, 40° ANGLE OF REPOSE

IBA STOCKPILE
4,400sq m IN STOCKPILES 8m
HIGH, 40° ANGLE OF REPOSE

INFEED IBA STOCKPILE
124.6M LONG X 55 M WIDE X 10M HIGH
= 261985M3 x 1.2mt = 744000
ANGLE OF REPOSE 40°

FASERFIX SUPER 200 BY HAURATON
OUTLET VIA PROPRIETARY SUMP

SURFACE WATER PUMPING STATION
75mm RISING MAIN IN 100mm DUCTING
UNDER REINFORCED BANK, THEN
VERTICAL ON FACE OF RETAINING WALL,
TO DISCHARGE INTO SITE THROUGH WALL

3m HIGH GALVANISED STEEL
PALISADE SECURITY FENCE
BOLTED DOWN TO SLAB

IN SITU REINFORCED
CONCRETE WALL TO
PROTECT CAR PARKING

VERGE MARKER POSTS
@ 2.0m CENTRES

SPRING STEEL BUFFERS GH TYPE
76x10mm. REFER TO MANUFACTURERS
INSTALLATION GUIDE

OFFICE AND WEIGHBRIDGE
FOUNDATIONS SEE DRAWING
19-0224/S005&S007

BOLLARDS

WHEEL WASH DETAIL
TO BE CONFIRMED

METAL
STORAGE BAYS

NF (A)
1-3mm

NF (B)
1-3mm

NF (A)
0-1.3mm

NF (B)
0-1.3mm

NF (A)
3-6mm

NF (B)
3-6mm

TO SPRAY
HEADS

WEDGE PIT
SEE DRAWING
19-0224/S004

SILTBUSTER
PLINTH

PUMPS

WTE VORTEX

ISOLATION
JOINT

FW1
Ø1.2m
CL 3.585m
IL 1.85m

12.0m WIDE MAIN
ACCESS GATE

12m WIDE
PEDESTRIAN
ACCESS GATE

BOLLARD

VERGE 0.8m WIDE
PC EDGING

ACCESS ROAD 6m WIDE
PC KERB 150mm FACE

FOOTWAY 1.8m WIDE

IN SITU REINFORCED
CONCRETE WALL TO
PROTECT SUB STATION

SUB STATION

EXTEND OF PROPOSED
PROCESSING PLANT
(DETAILS TO BE CONFIRMED)

FALLS

LEACHATE WATER
STORAGE TANK
SEE DRAWING 19-0224/S005

ISOLATION JOINT

FW1.2
Ø1.2m
CL 3.760m
IL 0.760m

DISCHARGE TO
EARTH DITCH

HEADWALL

ARTICULATED LORRY
TURNING CIRCLE

SEE
INSET
ABOVE

SCALE 1-250

Notes:

1. DO NOT SCALE FROM THIS DRAWING.
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL OTHER DRAWINGS AND SPECIFICATIONS ASSOCIATED WITH THIS PROJECT.

CDM REGULATIONS 2015 - RESIDUAL RISKS -

1. EXISTING UTILITY MAINS & SERVICES ARE PRESENT AND HAVE BEEN TAKEN FROM RECORDS OBTAINED FROM THE UTILITY COMPANIES. THERE IS A RISK OF UNCHARTED SERVICES BEING PRESENT.
2. THE CONTRACTOR MUST TAKE ADEQUATE PRECAUTIONS FROM THE POSSIBLE PRESENCE AND CONTAMINATION FROM LEPTOSPIROSIS (WEILS DISEASE)
3. THE WORKS WILL INVOLVE THE MOVEMENT OF PLANT AND MACHINERY IN AND AROUND A LIVE CARRIAGEWAY. THERE IS A RISK OF POTENTIAL CONFLICT BETWEEN PLANT AND ROAD/PEDESTRIAN USERS.

NOTES:

1. PROPOSED ACHIEVABLE LEVELS HAVE BEEN TAKEN FROM VERTASE FLI DRAWING D1779_18 DATED 06/09/19
2. CONTRACTOR WILL INDICATE SLAB JOINT POSITIONS TO BE APPROVED BY THE PROJECT MANAGER.
3. IBA - 1.2 TONNES PER CUBE / ANTICIPATED TONNAGE IS 31,000 t
4. IBAA - 1.2 TONNES PER CUBE / ANTICIPATED TONNAGE 75,000 t
5. LOWER GROUND TO BE IMPROVE BY DEEP SOIL MIXING TO ACHIEVE A CBR OF 10%

Rev	Description	Drn	Chk	Date
B	ROAD CHANNEL DRAIN EXTENDED	SGS	CJM	21.11.19
A	TENDER ISSUE	SGS	CJM	15.11.19

BdR Incorporating
K L Harrison & Associates Ltd
Civil & Structural Engineering Consultants
The Old Engine House, Goblands Farm Business Park
Court Lane, Goudhurst, TN17 1DP
Tel 01732 851416
email: engineering@bdr.uk.com

Client
FORTIS
Preserving our Natural Resources

Project
IBA PLANT KEMSLEY

Drawing
ENGINEERING LAYOUT
8 ACRES SITE

TENDER ISSUE

Scale @ A0	Date	Drawn by	Checked
1:250	NOV'19	SGS	CJM

Job No.	Drg. No.	Rev
19-0224	C10111	B

Appendix B – Personal Injury Accident Data

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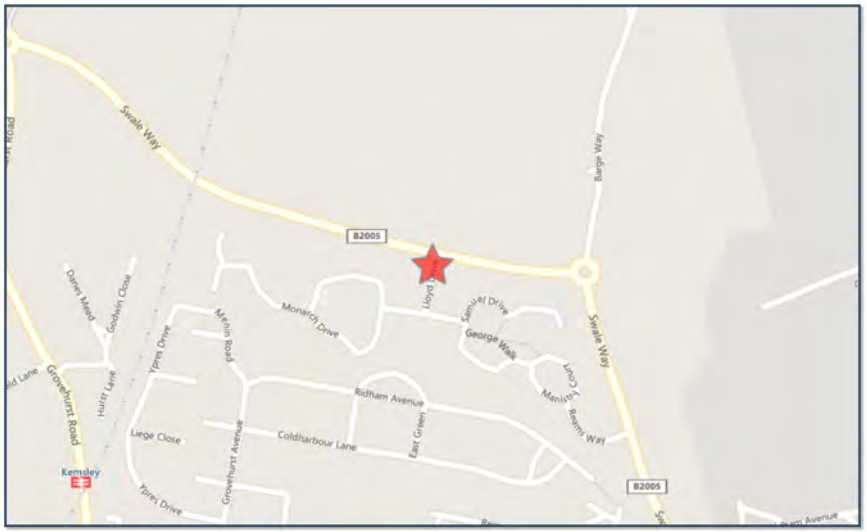
Crash Date:	Friday, January 03, 2014	**Time of Crash:**	5:15:00 PM	**Crash Reference:**	**2014460236674**

Highest Injury Severity:	Serious	**Road Number:**	U0	**Number of Casualties:**	2
Highway Authority:	Kent exc Medway Towns			**Number of Vehicles:**	2
Local Authority:	Swale District (B)			**OS Grid Reference:**	591050 166520
Weather Description:	Raining with high winds				
Road Surface Description:	Wet or Damp				
Speed Limit:	40				
Light Conditions:	Darkness: street lights present and lit				
Carriageway Hazards:	Any animal in carriageway (except ridden horse)				
Junction Detail:	T or staggered junction				
Junction Pedestrian Crossing:	Central refuge - no other controls				
Road Type:	Single carriageway				
Junction Control:	Give way or uncontrolled				



For more information about the data please visit: *www.crashmap.co.uk/home/aboutthedata* and *www.crashmap.co.uk/home/definitions*

Vehicles involved

Vehicle Ref	Vehicle Type	Vehicle Age	Driver Gender	Driver Age Band	Vehicle Maneouvre	First Point of Impact	Journey Purpose	Hit Object - On Carriageway	Hit Object - Off Carriageway
2	Car (excluding private hire)	4	Male	56 - 65	Vehicle proceeding normally along the carriageway, not on a bend	Front	Other	None	None
1	Car (excluding private hire)	1	Female	56 - 65	Vehicle proceeding normally along the carriageway, not on a bend	Front	Other	None	None

Casualties

Vehicle Ref	Casualty Ref	Injury Severity	Casualty Class	Gender	Age Band	Pedestrian Location	Pedestrian Movement
1	1	Serious	Driver or rider	Female	56 - 65	Unknown or other	Unknown or other
2	2	Slight	Driver or rider	Male	56 - 65	Unknown or other	Unknown or other

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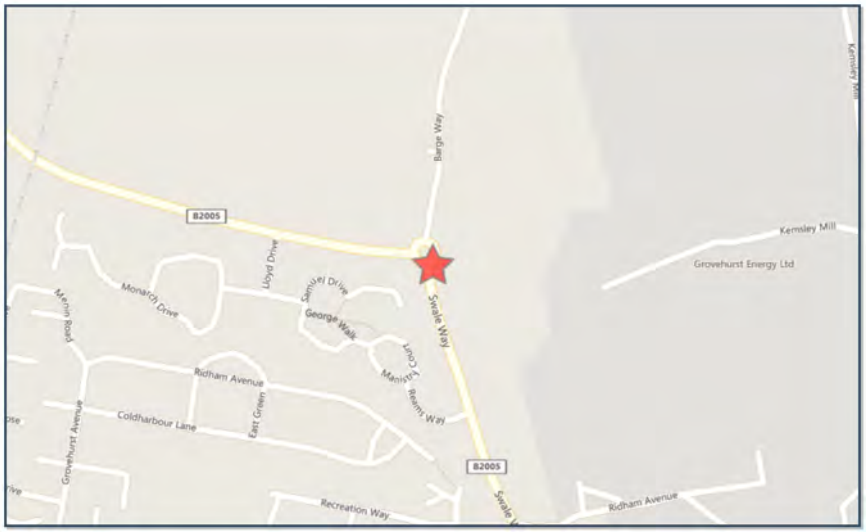
Crash Date:	Friday, January 17, 2014	**Time of Crash:**	9:50:00 AM	**Crash Reference:**	**2014460237020**

Highest Injury Severity:	Slight	**Road Number:**	U0	**Number of Casualties:**	1
Highway Authority:	Kent exc Medway Towns			**Number of Vehicles:**	3
Local Authority:	Swale District (B)			**OS Grid Reference:**	591290 166500
Weather Description:	Fine without high winds				
Road Surface Description:	Wet or Damp				
Speed Limit:	40				
Light Conditions:	Daylight: regardless of presence of streetlights				
Carriageway Hazards:	None				
Junction Detail:	Roundabout				
Junction Pedestrian Crossing:	No physical crossing facility within 50 metres				
Road Type:	Roundabout				
Junction Control:	Give way or uncontrolled				



For more information about the data please visit: *www.crashmap.co.uk/home/aboutthedata* and *www.crashmap.co.uk/home/definitions*

Vehicles involved

Vehicle Ref	Vehicle Type	Vehicle Age	Driver Gender	Driver Age Band	Vehicle Maneouvre	First Point of Impact	Journey Purpose	Hit Object - On Carriageway	Hit Object - Off Carriageway
3	Car (excluding private hire)	5	Female	56 - 65	Vehicle is waiting to proceed normally but is held up	Back	Other	None	None
2	Goods vehicle 7.5 tonnes mgw and over	-1	Male	21 - 25	Vehicle is reversing	Did not impact	Journey as part of work	None	None
1	Car (excluding private hire)	6	Male	21 - 25	Vehicle proceeding normally along the carriageway, not on a bend	Front	Other	None	None

Casualties

Vehicle Ref	Casualty Ref	Injury Severity	Casualty Class	Gender	Age Band	Pedestrian Location	Pedestrian Movement
3	1	Slight	Vehicle or pillion passenger	Female	46 - 55	Unknown or other	Unknown or other

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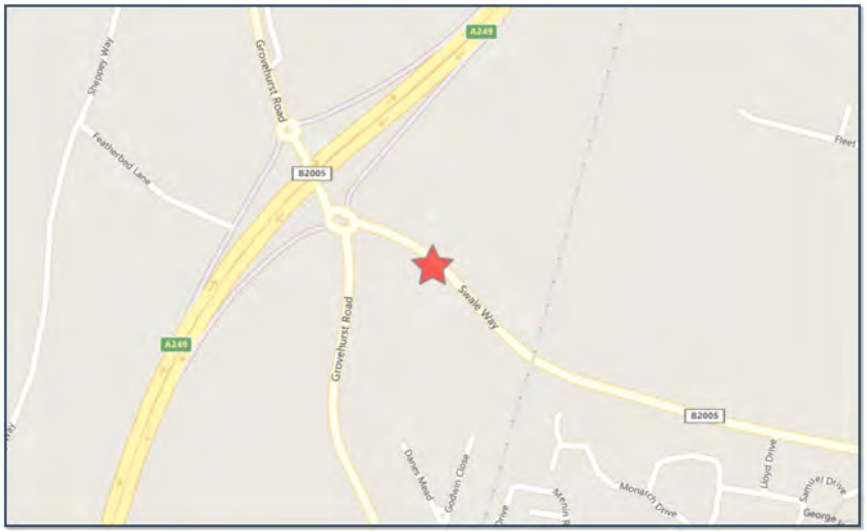
Crash Date:	Saturday, May 30, 2015	**Time of Crash:**	5:52:00 PM	**Crash Reference:**	**2015460257681**

Highest Injury Severity:	Slight	**Road Number:**	U0	**Number of Casualties:**	2
Highway Authority:	Kent exc Medway Towns			**Number of Vehicles:**	2
Local Authority:	Swale District (B)			**OS Grid Reference:**	590540 166760
Weather Description:	Fine without high winds				
Road Surface Description:	Dry				
Speed Limit:	40				
Light Conditions:	Daylight: regardless of presence of streetlights				
Carriageway Hazards:	None				
Junction Detail:	T or staggered junction				
Junction Pedestrian Crossing:	No physical crossing facility within 50 metres				
Road Type:	Single carriageway				
Junction Control:	Give way or uncontrolled				



For more information about the data please visit: *www.crashmap.co.uk/home/aboutthedata* and *www.crashmap.co.uk/home/definitions*

Vehicles involved

Vehicle Ref	Vehicle Type	Vehicle Age	Driver Gender	Driver Age Band	Vehicle Maneouvre	First Point of Impact	Journey Purpose	Hit Object - On Carriageway	Hit Object - Off Carriageway
2	Car (excluding private hire)	9	Female	26 - 35	Vehicle proceeding normally along the carriageway, not on a bend	Front	Other	None	None
1	Car (excluding private hire)	10	Male	16 - 20	Vehicle is performing a U turn	Offside	Other	None	None

Casualties

Vehicle Ref	Casualty Ref	Injury Severity	Casualty Class	Gender	Age Band	Pedestrian Location	Pedestrian Movement
1	1	Slight	Driver or rider	Male	16 - 20	Unknown or other	Unknown or other
1	2	Slight	Vehicle or pillion passenger	Female	46 - 55	Unknown or other	Unknown or other

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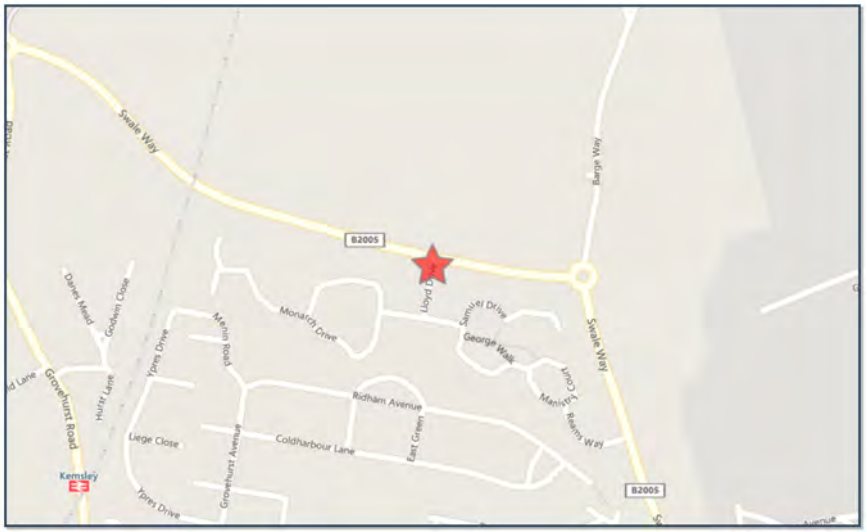
Crash Date:	Thursday, March 10, 2016	**Time of Crash:**	7:20:00 AM	**Crash Reference:**	**2016460052935**

Highest Injury Severity:	Slight	**Road Number:**	U0	**Number of Casualties:**	1
Highway Authority:	Kent exc Medway Towns			**Number of Vehicles:**	2
Local Authority:	Swale Borough			**OS Grid Reference:**	591055 166520
Weather Description:	Fine without high winds				
Road Surface Description:	Dry				
Speed Limit:	40				
Light Conditions:	Daylight: regardless of presence of streetlights				
Carriageway Hazards:	None				
Junction Detail:	T or staggered junction				
Junction Pedestrian Crossing:	Central refuge - no other controls				
Road Type:	Single carriageway				
Junction Control:	Give way or uncontrolled				



For more information about the data please visit: *www.crashmap.co.uk/home/aboutthedata* and *www.crashmap.co.uk/home/definitions*

Vehicles involved

Vehicle Ref	Vehicle Type	Vehicle Age	Driver Gender	Driver Age Band	Vehicle Maneouvre	First Point of Impact	Journey Purpose	Hit Object - On Carriageway	Hit Object - Off Carriageway
2	Car (excluding private hire)	2	Female	36 - 45	Vehicle proceeding normally along the carriageway, not on a bend	Nearside	Other	None	Lamp post
1	Car (excluding private hire)	9	Male	26 - 35	Vehicle is in the act of turning right	Front	Other	None	None

Casualties

Vehicle Ref	Casualty Ref	Injury Severity	Casualty Class	Gender	Age Band	Pedestrian Location	Pedestrian Movement
2	1	Slight	Driver or rider	Female	36 - 45	Unknown or other	Unknown or other

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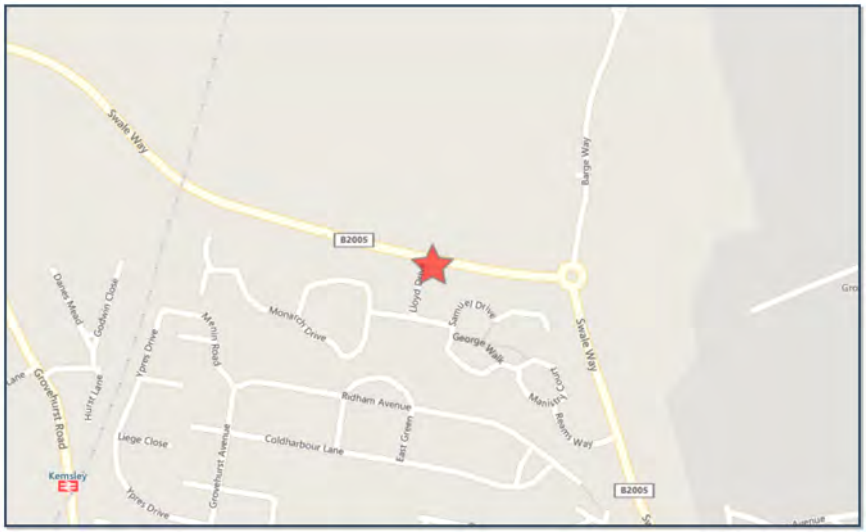
Crash Date:	Monday, January 30, 2017	**Time of Crash:**	4:47:00 PM	**Crash Reference:**	**2017460153869**

Highest Injury Severity:	Serious	**Road Number:**	B2005	**Number of Casualties:**	1
Highway Authority:	Kent exc Medway Towns			**Number of Vehicles:**	2
Local Authority:	Swale Borough			**OS Grid Reference:**	591069 166521
Weather Description:	Fine without high winds				
Road Surface Description:	Dry				
Speed Limit:	40				
Light Conditions:	Darkness: street lighting unknown				
Carriageway Hazards:	None				
Junction Detail:	T or staggered junction				
Junction Pedestrian Crossing:	No physical crossing facility within 50 metres				
Road Type:	Single carriageway				
Junction Control:	Give way or uncontrolled				



For more information about the data please visit: *www.crashmap.co.uk/home/aboutthedata* and *www.crashmap.co.uk/home/definitions*

Vehicles involved

Vehicle Ref	Vehicle Type	Vehicle Age	Driver Gender	Driver Age Band	Vehicle Maneouvre	First Point of Impact	Journey Purpose	Hit Object - On Carriageway	Hit Object - Off Carriageway
2	Motorcycle over 125cc and up to 500cc	1	Male	56 - 65	Vehicle is in the act of turning right	Nearside	Other	None	None
1	Car (excluding private hire)	9	Male	26 - 35	Vehicle proceeding normally along the carriageway, not on a bend	Front	Other	None	None

Casualties

Vehicle Ref	Casualty Ref	Injury Severity	Casualty Class	Gender	Age Band	Pedestrian Location	Pedestrian Movement
2	1	Serious	Driver or rider	Male	56 - 65	Unknown or other	Unknown or other

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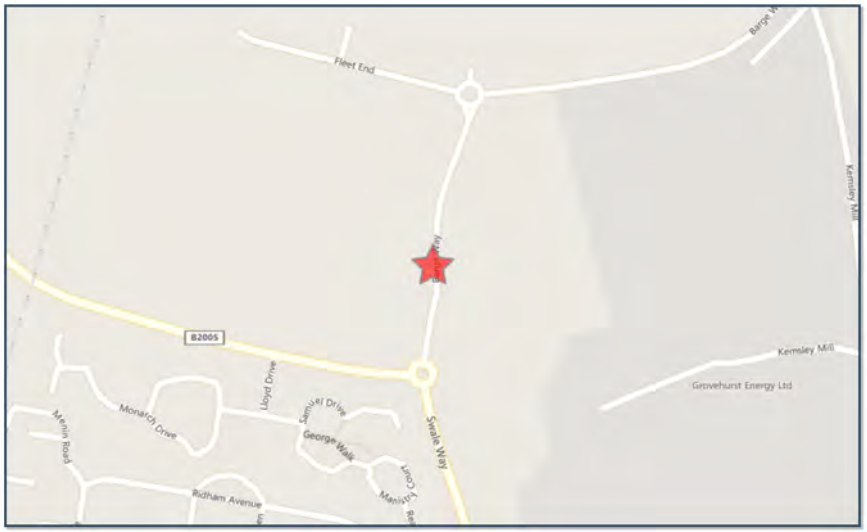
Crash Date:	Tuesday, September 18, 2018	**Time of Crash:**	7:15:00 AM	**Crash Reference:**	**2018460335508**

Highest Injury Severity:	Slight	**Road Number:**	U0	**Number of Casualties:**	1
Highway Authority:	Kent exc Medway Towns			**Number of Vehicles:**	2
Local Authority:	Swale Borough			**OS Grid Reference:**	591286 166673
Weather Description:	Fine without high winds				
Road Surface Description:	Dry				
Speed Limit:	30				
Light Conditions:	Daylight: regardless of presence of streetlights				
Carriageway Hazards:	None				
Junction Detail:	T or staggered junction				
Junction Pedestrian Crossing:	No physical crossing facility within 50 metres				
Road Type:	Single carriageway				
Junction Control:	Give way or uncontrolled				



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Vehicles involved

Vehicle Ref	Vehicle Type	Vehicle Age	Driver Gender	Driver Age Band	Vehicle Maneouvre	First Point of Impact	Journey Purpose	Hit Object - On Carriageway	Hit Object - Off Carriageway
1	Good vehicles of unknown weight	-1	Male	Unknown	Vehicle is moving off	Front	Commuting to/from work	None	None
2	Pedal cycle	-1	Male	46 - 55	Vehicle is moving off	Nearside	Commuting to/from work	None	None

Casualties

Vehicle Ref	Casualty Ref	Injury Severity	Casualty Class	Gender	Age Band	Pedestrian Location	Pedestrian Movement
2	1	Slight	Driver or rider	Male	46 - 55	Unknown or other	Unknown or other

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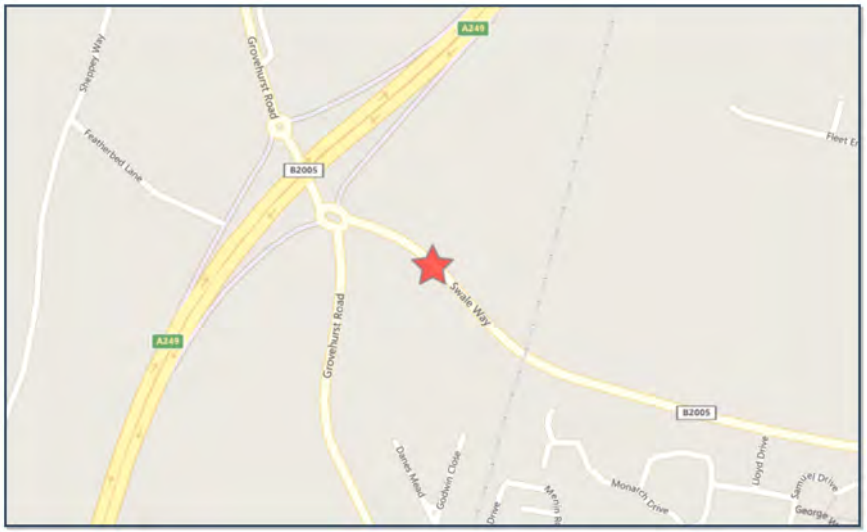
Crash Date:	Monday, November 12, 2018	**Time of Crash:**	12:52:00 PM	**Crash Reference:**	**2018460347693**

Highest Injury Severity:	Slight	**Road Number:**	U0	**Number of Casualties:**	1
Highway Authority:	Kent exc Medway Towns			**Number of Vehicles:**	2
Local Authority:	Swale Borough			**OS Grid Reference:**	590551 166757
Weather Description:	Fine without high winds				
Road Surface Description:	Dry				
Speed Limit:	40				
Light Conditions:	Daylight: regardless of presence of streetlights				
Carriageway Hazards:	None				
Junction Detail:	Not at or within 20 metres of junction				
Junction Pedestrian Crossing:	No physical crossing facility within 50 metres				
Road Type:	Single carriageway				
Junction Control:	Not Applicable				



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Vehicles involved

Vehicle Ref	Vehicle Type	Vehicle Age	Driver Gender	Driver Age Band	Vehicle Maneouvre	First Point of Impact	Journey Purpose	Hit Object - On Carriageway	Hit Object - Off Carriageway
2	Car (excluding private hire)	7	Male	36 - 45	Vehicle is waiting to proceed normally but is held up	Back	Other	None	None
1	Motorcycle over 50cc and up to 125cc	-1	Female	26 - 35	Vehicle proceeding normally along the carriageway, not on a bend	Front	Other	None	None

Casualties

Vehicle Ref	Casualty Ref	Injury Severity	Casualty Class	Gender	Age Band	Pedestrian Location	Pedestrian Movement
1	1	Slight	Driver or rider	Female	26 - 35	Unknown or other	Unknown or other

Appendix C – Operational Daily Vehicle Movements

Operational Daily Trip Generation

Time Begin	Weekday						Saturday					
	Arrivals		Departures		Two Way		Arrivals		Departures		Two Way	
	Car	HGV	Car	HGV	Car	HGV	Car	HGV	Car	HGV	Car	HGV
00:00												
01:00												
02:00												
03:00												
04:00												
05:00	5				5		5				5	
06:00		8	5	8	5	16		8	5	8	5	16
07:00		8		8		16		8		8		16
08:00		8		8		16		8		8		16
09:00		8		8		16		8		8		16
10:00		8		8		16		8		8		16
11:00		8		8		16		8		8		16
12:00		8		8		16		8		8		16
13:00	5	8		8	5	16	5	8		8	5	16
14:00		8	5	8	5	16		8	5	8	5	16
15:00		8		8		16		8		8		16
16:00		8		8		16		8		8		16
17:00		8		8		16		8		8		16
18:00		8		8		16		8		8		16
19:00												
20:00												
21:00	5				5		5				5	
22:00			5		5				5		5	
23:00												
Total	15	102	15	102	31	205	15	102	15	102	31	205

Contact

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