

MEDWAY COUNCIL

REPORT	Delegated Decision Report – 09/02/2024
Report Title	Safer, Healthier Streets Programme - Provision of Red Routes Controls (Rainham) TRO Results of Consultation and Recommendations
Department	Climate Change and Strategic Regeneration Frontline Services
Report Author/ Contact details	Alex Constantinides – Strategic Lead, Frontline Services
Wards affected	Rainham South West and Rainham North
Public Access	Personal details have been redacted before being released to the public
Appendices	Appendix A Notice of Proposals (published in the Medway Messenger) Appendix B Responses received Appendix C Petition with council reply

1. SUMMARY

- 1.1 With the increased regeneration, housing and population growth in Medway vehicle numbers and traffic has continued and will continue to grow. To help meet council policy and the aims set out in the Local Transport Plan, a strategic network of Red Routes has been proposed to help maintain a safe and efficient highway network. Installing these restrictions will provide more effective enforcement of indiscriminate parking which will help to improve road safety, and create less delays on essential bus routes.
- 1.2 As part of the Safer, Healthier Streets programme it is proposed to implement red route restrictions along A2 Rainham High Street, a key strategic transport link within Medway. This would involve replacing existing double yellow line restrictions with double red lines along the route between the junction of the A2 with Maidstone Road and the A2 and High Dewar Road. All formal parking bays on the routes are maintained, with 3 additional bays proposed following requests from the community.
- 1.3 At the Cabinet meeting held on the 5th September 2023, Cabinet agreed to progress 5 Red Routes, subject to the formal Traffic Regulation Order (TRO) process and the outcome of the statutory 21-day consultation period. This report considers the Rainham High Street between Maidstone Road and High Dewar Road route.
- 1.4 On 17 October 2023, the proposal for A2 Rainham High Street was considered by the Overview and Scrutiny Committee after the cabinet decision from 5 September was called in. The committee voted to progress the proposal, subject to TRO statutory consultation.
- 1.5 Delegated authority was approved for the Director of Place in consultation with the Portfolio Holder for Climate Change and Strategic Regeneration to consider the outcome of the TRO consultation process and whether to proceed with the infrastructure work and implementation of the scheme.

- 1.6 This report considers the statutory consultation and makes recommendations on the following orders which can be found in Appendix A:

The Medway Council (Rainham) (Red Routes) Traffic Order 202*

The Medway Council (Chatham) (Parking Places and Waiting, Loading and Stopping Restrictions) (Amendment No. -) Order 202*

2. RECOMMENDATIONS

- 2.1 For the reasons set out in this report and the Cabinet report presented on the 5th September 2023 the Director of Place in consultation with the Portfolio Holder for Climate Change and Strategic Regeneration in line with approved delegated powers is recommended to:

- Consider the objections received to these traffic orders and accept officers response as detailed in appendix B of the report
- Agree to make the traffic orders which give permanent effect to the Red Route Controls as laid out in section 1.3 under the provisions of section 124, Schedule 1 and Part IV of Schedule 9 of the Road Traffic Regulation Act 1984 and of the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 regulations 23 and 24.

3. TRO CONSULTATION PROCESS

- 3.1 The statutory TRO consultation took place between 30th November and 22nd December 2023 which included:

- Publication of the "Notice of Proposals" in the Medway Messenger on 30th November 2023;
- Street notices were placed on lamp columns along each red route site;
- emails to statutory / representative organisations, including the emergency services, and other key stakeholders.

- 3.2 The Notice of Proposals referred to above is attached as Appendix A.

- 3.3 A separate Notice of Proposal was also advertised for proposed routes in Chatham and Rochester.

4. STATUTORY OBJECTIONS / FEEDBACK

As part of the consultation process, emails were sent to all statutory consultees notifying them of the advertised traffic orders and inviting feedback on the proposed scheme. Feedback received has been provided below:

Emergency services

- 4.1 On 30th November 2023 a representative from Kent Police confirmed that they had no specific objections to the scheme. The remaining emergency services have not raised any specific concerns, objections or comments in relation to the Medway Red Route (Rainham) traffic order.

Road Haulage Association

4.2 The Road Haulage Association have not raised any specific concerns, objections or comments in relation to the Medway Red Route (Rainham) traffic order.

Freight Transport Association

4.3 The Freight Transport Association have not raised any specific concerns, objections or comments in relation to the Medway Red Route (Rainham) traffic order.

Bus companies

4.4 On 22nd December 2023, Bus Company Arriva confirmed they are in full support of the Medway Red Route (Rainham) traffic order.

Other statutory feedback

4.5 As part of the TRO process, we delivered over 800 letters to residents and business in the local areas to the proposed red route sites and updated the council website to keep the community informed.

4.6 During the 3-week statutory TRO consultation 53 submissions were received, 34 of which were objections, 11 were submissions of support and eight general comments. The details of each submission can be found within Appendix B of this report and have been considered and officers comments provided.

4.7 Seven of the submissions included requests for additional information, including the Notice of Proposals. These requests were all actioned during the period.

4.8 One objection received was in the form of a petition. It had 206 signatures. The Council have responded to the petition in line with Medway democratic policy. The petition and council reply are outlined in Appendix C.

4.9 11 submissions were in support of the proposal. Reasons sighted included reductions in illegal parking, improvements for pedestrians when crossing the road, and enforcement would no longer rely just on enforcement officers.

4.10 Of the 34 objections key themes and concerns raised included:

Theme	Question/concern/comment	Officers' comments
Congestion	<p>Causes of congestion won't be addressed by a red routes restriction.</p> <p>Reports that main source of congestion is road works, traffic light sequencing and poor road layout, not indiscriminate parking.</p>	<p>Reducing congestion in Medway is a key objective set out in both the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network. Among others this includes remote connectivity of our traffic signals in town centres to allow monitoring and response to live traffic condition to optimise traffic flow, a dedicate team that manage and co-ordinate essential road works across the network, individual highway improvement schemes and the safer healthier streets programme.</p> <p>The Safer, Healthier, Streets Programme includes the proposed introduction of Red Routes which aims</p>

		<p>to help contribute to a better flow of traffic by reducing obstructions such as indiscriminate parking.</p> <p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. Feedback from the public consultation suggest that residents have experienced dangerous and inconvenient parking along the 5 proposed red route locations despite the presence of double yellow line restrictions. The introduction of the red routes will enable more efficient and effective management of the network and reduce obstructions such as indiscriminate parking which will aid towards improve congestion and the safety of the network.</p>
Programme cost	<p>Public money should be redirected to other programmes.</p> <p>Implementation of programme is revenue raising exercise for council.</p>	<p>Introducing red routes is an effective traffic management tool which enables better enforcement of traffic restrictions through the use of ANPR technology.</p> <p>These restrictions will provide several benefits including more effective enforcement of indiscriminate parking which will help to improve road safety and reduce congestion, create less delay on essential bus routes.</p> <p>The enforcement of moving traffic restrictions will contribute to reducing dangerous and indiscriminate driving behaviours improving road safety. Income from PCNs will be used to service the running costs associated with back-office resource, necessary enforcement and capital set up costs of infrastructure and associated ongoing maintenance. Any surplus income is ring fenced to Transport and Highways. Examples of what it can be used for include highway repairs, public transport infrastructure and environmental improvement projects.</p>
Consultation not conducted in line with statutory requirements	<p>TRO contained inaccurate information, and referenced, incorrectly another Local Authority.</p> <p>Concerns that hard copies of the TROs could not be accessed by the public, due to a temporary closure of Council buildings.</p>	<p>The draft traffic order includes reference to Luton Borough Council in two Articles, which have no effect and will be removed if the order is subsequently finalised and 'made'. As there are red routes successfully operating in other parts of the country it is unnecessary to draft an order from scratch and we do engage with other authorities to ensure a similar approach is taken.</p> <p>TRO consultation documents have been made available at Gun Wharf when requested either in person, by phone or email. There was also a temporary reception in situ. The majority of respondents ask for documents in an electronic format, however temporary arrangements were in place at Gun Wharf to make documents available to the public, as some internal teams continue to work</p>

		within the offices including those able to deal with traffic orders.
Consultation process	Lack of public support and concerns that statutory consultation notices were not clear and transparent. Concerns regarding lack of transparency.	In line with best practice and council policy, an open and accessible engagement process was conducted to build understanding and seek feedback on the proposal. From July 2023, officers acting on behalf of Medway conducted a public consultation. All outcomes of the consultation process were published in the report listed under item 6, which was presented in full to cabinet and is publicly available.

5. IMPLICATIONS

5.1 The financial, legal and equalities implications of the scheme, and the impact on climate change, the environment and health and wellbeing are set out in the Cabinet Report approved on 5th September 2023.

6. BACKGROUND INFORMATION

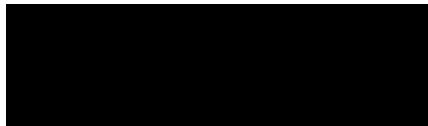
- 5th September 2023 – Cabinet Report: [Safer, Healthier Streets Programme – Red Routes and Moving Traffic Enforcement](#)

7. CONCLUSION

7.1 Having considered all feedback to the statutory consultation, it is felt there is insufficient relevant compelling reasons that has been presented during the statutory consultation to require a significant change to the proposals and subsequently to the traffic orders, therefore the Red Route restrictions on A2 Rainham High Street should proceed and the traffic order made permanent.

I agree / ~~disagree~~ with the recommendations laid out in this report.

Signed



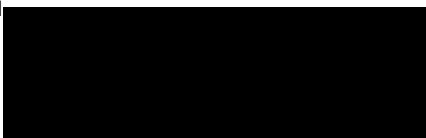
Date

14/02/24

Councillor Simon Curry

Portfolio Holder for Climate Change and Strategic Regeneration

Medway Cou



Signed

Date

14/02/24

Adam Bryan

Director of Place

Medway Council



PROVISION OF RED ROUTE CONTROLS

NOTICE OF PROPOSAL

The Medway Council (Rainham) (Red Route) Traffic Order 202*

The Medway Council (Rainham North) (Parking Places and Waiting, Loading and Stopping Restrictions) (Amendment No. -) Order 202*

The Medway Council (Rainham South) (Parking Places and Waiting, Loading and Stopping Restrictions) (Amendment No. -) Order 202*

1. NOTICE IS HEREBY GIVEN that Medway Council proposes to make the above-mentioned Orders.
2. The general effect of the Orders would be to introduce Red Route controls, where the stopping of vehicles (other than as specified in paragraph 3 of this Notice) is prohibited at any time, in **High Street, Rainham (A2)**, between its junction with Maidstone Road and No. 249 High Street, Rainham and extending up to 20 metres on both sides of each of the side roads or vehicle entrances opening into those roads, and to remove all existing parking places, loading bays and 'yellow line' waiting and loading restrictions in those lengths of road.
3. Within the lengths referred to in paragraph 2 of this Notice, the following exemptions to the stopping restrictions would be provided:
 - (a) short stay parking (30 minutes maximum stay, 30 minutes no return) between 8am and 6pm on Mondays to Saturdays inclusive in **High Street, Rainham (A2)**: (i) north side, outside Nos. 11 to 21 High Street (approximately 37.4 metres in length); and (ii) north side, outside No. 117 High Street (approximately 20.7 metres in length); [Note: There would be no red route controls outside of these times in these two lengths]
 - (b) loading only (20 minutes maximum stay) between 10am and 4pm and between 6pm and 8am (the red route no stopping restriction applies at all other times) in **High Street, Rainham (A2)**, north side, outside Nos. 79/81 High Street (approximately 8 metres in length);
 - (c) combined loading only (20 minutes maximum stay) / disabled persons parking (2 hours maximum stay) 'at any time' in **High Street, Rainham (A2)**: (i) south side, outside Nos. 78 to 82 High Street (approximately 16.5 metres in length); and (ii) north side, outside Nos. 45 to 47a/47b High Street (approximately 15.3 metres in length); and
 - (d) disabled persons (blue badge holders) parking 'at any time' in **High Street, Rainham (A2)** north side, outside No. 117 High Street (approximately 7.4 metres in length); Note: an advisory disabled persons' parking place is currently in this location.
4. Copies of the proposed Orders, the Council's statement of reasons for making the Orders, and of plans showing their effect, may be inspected at the front reception, Medway Council, Gun Wharf, Dock Road, Chatham, Kent, ME4 4TR during normal office hours on Mondays to Fridays inclusive (except for public holidays). Alternatively, electronic copies of the documents can be requested by sending an email to parkingdesign@medway.gov.uk on the understanding that it may take up to 5 working days for the request to be processed and the copies sent.
5. Any objections or other representations to the proposed Orders should be sent in writing to be considered, by email to parkingdesign@medway.gov.uk or by post to "Parking Design team" at the address specified in paragraph 4 above 5pm on **Friday, 22 December 2023** stating name, address and the grounds for objection or support.

Dated: Thursday 30 November 2023

ADAM BRYAN
Director of Place

APPENDIX B – RESPONSES RECEIVED (RAINHAM)

Please note – all identifying information has been removed from this report.

Name / road	Objection / feedback	Officer's response
	<p>Hi,</p> <p>I just wanted to say I completely agree with the implementation of the red route in Rainham and the design you have proposed.</p> <p>I regularly cross the road at Rainham precinct to take my kids to school and I often to see cars parked there holding up traffic and breaking the traffic laws.</p> <p>I do hope that the cameras will also be used to capture traffic turning right into orchard street which is an offence.</p> <p>Kind regards</p>	<p>Support noted.</p> <p>The right-hand turn into Orchard Street will be enforced with ANPR cameras as part of our Moving Traffic Enforcement programme starting early 2024.</p>
	<p>Good Morning.</p> <p>I strongly oppose to the proposed red route in Rainham. The issue through here is the amount of houses being built and the amount of cars using this stretch of road to pass through Rainham. The red route will have a massive negative impact on local businesses, and it is another way of taxing the hard working people of Rainham with a 'stealth style tax'.</p> <p>Thanks</p>	<p>Objection noted.</p> <p>Businesses were thoroughly consulted with during the engagement process. The project team spoke to more than 60 businesses about their loading and access requirements. These comments were used to add three loading bays into the plans. Once the plans had been updated, the project team visited Rainham High Street again to confirm the position of the loading bays would work for businesses.</p> <p>The development of housing sites within the Medway is governed by the planning application process. This process looks at how the application matches against Medway planning policy and among other things impacts on the local community such as traffic. The development of red routes is a</p>

Name / road	Objection / feedback	Officer's response
		<p>management tool to help the flow of the network and is not in place to enable or resolve the impact of housing developments.</p> <p>All decisions regarding expenditure are made in line with Medway Council's strategic plans. The red routes programme assists the council in meeting the objectives set out in the Medway Council Strategy 2023 to 2024 and the Local Transport Plan.</p>
	<p>I wish to object to the decision to enforce red routes in Rainham High Street despite the opposition during "consultation". This proposal is initially a waste of public money, but of course, then followed by the usual highway robbery of ANPR cameras conning people into paying fines for unavoidably stopping on an always congested road.</p> <p>I have lived in Rainham for 54 years and been driving in Rainham for 42 years and have never been inconvenienced by vehicles stopping on the high street. I am constantly inconvenienced by the over population of Rainham due to the gross over building of unwanted properties.</p> <p>I would agree that the infrastructure is inadequate to say the least, but this is because of the squeezing in of too many people without improving the infrastructure.</p> <p>Enforcing a red route will not make the slightest difference to congestion in Rainham, it will merely serve to lessen the debt that the council is in. Moving traffic violations are notoriously fickle unless they are absolute, so this feels very much like the beginnings of a congestion charge.</p> <p>I would like to know how this serves the people of Rainham, when in the opinion of every person I have discussed it with, it is just another slap in the face for local residents.</p> <p>Please acknowledge receipt of this objection.</p> <p>Regards</p>	<p>Objections noted.</p> <p>An acknowledgement of the objection was sent at the time it was received.</p> <p>All decisions regarding expenditure are made in line with Medway Council's strategic plans. The red routes programme assists the council in meeting the objectives set out in the Medway Council Strategy 2023 to 2024 and the Local Transport Plan.</p> <p>The development of housing sites within the Medway is considered via the planning application process. This process looks at how the application aligns to Medway planning policy and among other things impacts on the local community such as traffic. The development of red routes it a management tool to help the flow of traffic on the network and is not in place to enable or resolve the impact of housing developments.</p> <p>People will not be given a PCN for stopping while in traffic. PCNs will only be awarded if someone intentionally parks, stops, or loads on the red route.</p>

Name / road	Objection / feedback	Officer's response
		<p>People will not be issued a PCN for stopping as they wait in traffic. They will only be given a PCN if they purposefully stop, load or park on the double red lines. Before a PCN is issued, all footage will be reviewed by a person to ensure this is the case.</p> <p>Reducing congestion in Medway is a key objective set out in both the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network. Among others this includes remote connectivity of our traffic signals in town centres to allow monitoring and response to live traffic condition to optimise traffic flow, a dedicated team that manage and co-ordinate essential road works across the network, individual highway improvement schemes and the Safer, Healthier Streets Programme.</p> <p>The Safer, Healthier, Streets Programme includes the proposed introduction of Red Routes which aims to help contribute to a better flow of traffic by reducing obstructions such as indiscriminate parking.</p> <p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. Feedback from the public consultation suggest that residents have experienced dangerous and inconvenient parking along the 5 proposed red route locations despite the presence of double yellow line restrictions. The introduction of the red routes will enable more</p>

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		<p>efficient and effective management of the network and reduce obstructions such as indiscriminate parking which will aid towards improve congestion and the safety of the network.</p>
	<p>Hello Parking Department,</p> <p>I drive the proposed red route daily and absolutely see no reason for further restrictions regarding stopping and/or waiting. Whilst I understand there is an influx of London escapees now becoming Medway residents, I do not think the proposed red route will benefit both traffic flow and businesses situated either side.</p> <p>Medway, and especially Rainham, has survived due to its ability to provide easy parking and freedom of movement. Medway is currently a very culturally and ethnically diverse town but has firm roots in its English heritage. This provides a unique opportunity for us to set the standard when it comes to town (soon to be city) management. I strongly feel that wildly applying London initiatives to a local community will not strengthen us as a community in any way.</p> <p>We have a chance here to really make something of this once great town. Big ad campaigns for our already established public transports routes, youth programs that actually engage them AND their parents. I have lived here all my life, and I can confidently say that the adults/parents need inspiring just as much as the youth. As responsible adults, we have forgotten our creative side, and this shows in the youth that we have created in our community. There is so much beauty in the town, we just need to unlock it.</p> <p>In summary, the funds proposed for red route implementation would be better utilised in development of community programs. If people are engaged locally, then they will not be driving across town, therefore, achieving your goal of traffic flow without a red route.</p>	<p>Objection noted.</p> <p>Reducing congestion in Medway is a key objective set out in both the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network. Among others this includes remote connectivity of our traffic signals in town centres to allow monitoring and response to live traffic condition to optimise traffic flow, a dedicated team that manage and co-ordinate essential road works across the network, individual highway improvement schemes and the Safer Healthier Streets Programme.</p> <p>The Safer, Healthier, Streets Programme includes the proposed introduction of Red Routes which aims to help contribute to a better flow of traffic by reducing obstructions such as indiscriminate parking.</p> <p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. Feedback from the public consultation suggest that residents have experienced dangerous and inconvenient parking along the 5 proposed red route locations despite the presence of double yellow line restrictions. The</p>

Name / road	Objection / feedback	Officer's response
	<p>I look forward to further updates regarding this issue.</p> <p>All the best,</p>	<p>introduction of the red routes will enable more efficient and effective management of the network and reduce obstructions such as indiscriminate parking which will aid towards improve congestion and the safety of the network.</p> <p>All decisions regarding expenditure are made in line with Medway Council's strategic plans. The red routes programme assists the council in meeting the objectives set out in the Medway Council Strategy 2023 to 2024 and the Local Transport Plan.</p>
	<p>As part of the official consultation, I would like to register by objection to the proposed red route in Rainham that directly affects some of my constituents as the route is directly outside their premisses as well as many local residents that will be effected by the implementation.</p> <p>In the initial round of consultation over 60% of those that responded and were included in the data analysis , which only included residents within 1km of the A2, were against the idea for Rainham High Street. At another meeting at the local Church in Rainham, that Cllr. Curry attended, which attracted almost 40 people made up of local business proprietors, councillors, environmentalists, and residents. When the discussion concluded there was a unanimous vote against the implementation of a Red Route in Rainham.</p> <p>The proposed route in Rainham is already subject to double yellow lines, which should prevent illegally parked cars but also allow for loading according to our enforcement policy, unlike Red Routes, the difference is Red Routes can be enforced by CCTV rather than a traffic enforcement officer (which will potentially generate more revenue for the council).</p> <p>I have lived in Rainham for over 60 years, and over that time of course the traffic along Rainham High Street has become worse, but this is not as a result of illegally parked cars. It is due more to an</p>	<p>Objection noted.</p> <p>The project team addressed the concerns of residents and businesses expressed during the engagement period in the updated plans approved by Cabinet. Three loading bays were added to the red route on Rainham High Street, provisions were made for people moving house and our engineers reviewed signage to ensure it was uncluttered.</p> <p>Reducing congestion in Medway is a key objective set out in both the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network. Among others this includes remote connectivity of our traffic signals in town centres to allow monitoring and response to live traffic condition to optimise traffic flow, a dedicated team that manage and co-ordinate essential road works across the network, individual highway</p>

Name / road	Objection / feedback	Officer's response
	<p>increase of vehicles as the population has increased and is exacerbated due to poor traffic management. This is compounded when road works shut the lower Rainham Road or there are motorway or junction closures which seem to have been ever present over the last year.</p> <p>The stated aim of the red routes is to prevent illegally parked cars, which in turn cuts congestion and increases traffic flow, making journeys more reliable cleaner etc.</p> <p>Along the proposed Red Route, which is about 1km in length, there is a mini roundabout and three bus stops on both sides of the road together with 5 sets of traffic lights, each with their own pedestrian controlled crossings. The shortest distance between two sets of traffic lights a mere 60m which is followed by another set only another 130m away.</p> <p>Traffic flow will not be increased along this route all the time these traffic management constraints are in place.</p> <p>One of the main issues that causes traffic congestion is the junction of Mierscourt Road and the A2 which holds up traffic in both directions for considerable amounts of time.</p> <p>Since I was elected as a councillor in 2019, I have been constantly asking for improvements to this junction at our now suspended quarterly meetings with the deputy director of place and her team. We have suggested purchasing the four cottages at the bottom of Mierscourt Road and redesigning the junction completely, diverting the footpath through the united Services club, these are just a couple of the more feasible suggestions;</p> <p>The council were awarded £175K in S106 payments back in 2017 to improve this junction and there have possibly been more S106 payments since this time.</p> <p>We need to fix this junction and review the other traffic management systems along this stretch of road before we implement any more supposed traffic management schemes to ease congestion in the High Street.</p> <p>So why is Rainham any different to the other proposed Red Routes?</p> <ul style="list-style-type: none"> • It is not a dual carriageway, all the others are • It is already one of the two roads in Rainham designated a zero-tolerance area for parking 	<p>improvement schemes and the Safer, Healthier Streets Programme.</p> <p>The Safer, Healthier, Streets Programme includes the proposed introduction of Red Routes which aims to help contribute to a better flow of traffic by reducing obstructions such as indiscriminate parking.</p> <p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. Feedback from the public consultation suggest that residents have experienced dangerous and inconvenient parking along the 5 proposed red route locations despite the presence of double yellow line restrictions. The introduction of the red routes will enable more efficient and effective management of the network and reduce obstructions such as indiscriminate parking which will aid towards improve congestion and the safety of the network.</p> <p>Delivery drivers will still be able to access any private properties, retail or hospitality businesses, they will just need to use formal loading and parking bays. All current parking and loading bays will be maintained, with three additional bays being introduced as part of the proposal. Further to this and as a result of community feedback, businesses and residents can apply for a one-off exemption if they are receiving a large delivery.</p> <p>We understand the comments in regards to the junction of Mierscourt Road and the A2 and are aware that this can be the cause of some congestion especially during peak times. The</p>

Name / road	Objection / feedback	Officer's response
	<ul style="list-style-type: none"> • It contains many businesses operating directly along the route that require access for loading • It has many residential addresses some with driveways directly onto the Red Route. <ul style="list-style-type: none"> o For example, how will delivery drivers, like Amazon or DPD etc. and tradesmen make calls or deliveries, such as siting a skip to these addresses. <p>Put quite simply Rainham is considerably different to the other proposed Red Routes, and the problems with congestion in Rainham is not due to illegally parked cars, as the road is wide enough for vehicles to be three abreast without causing a problem for most of the proposed length, the only reason Red Routes are being proposed is for potential income generation from increased fines due to the law, at the moment, which allows fines to be issued by CCTV enforcement rather than an enforcement officer that is required for double yellow lines. This may well change if the recent rulings in London are anything to go by.</p> <p>The latest guidance from the DfT says that “approved devices”, primarily automatic number plate recognition CCTV cameras, “are used only where enforcement is difficult or sensitive and enforcement by a Civil Enforcement Officer is not practical”. Which is not the case in Rainham High Street.</p> <p>In Summary</p> <ul style="list-style-type: none"> o There is no substantial evidence of illegal parking on Rainham High Street o Traffic flow is not restricted by illegally parked cars o Rainham High Street is very different in make up with residential properties and many small businesses operating along its length than the other proposals. o Better traffic management is the key to increasing traffic flow along the High Street. <p>So please consider if the major capital investment to install, and revenue cost to maintain and provide the system in Rainham and will actually reap any dividends and pay for itself even in the long term.</p> <p>Best Regards</p>	<p>junction has many constraints which makes it difficult to improve without extensive changes or significant investment. We are currently considering ways to improve the traffic congestion at the Mierscourt Road to improve traffic flow through the junction. Plans are currently being accessed using traffic modelling software.</p> <p>Traffic control measures, like pedestrian walk ways, are put in place to appropriately distribute and control road traffic flows, to help avoid incidents between road users or to reduce their impacts if they are to occur.</p> <p>In the town centres, traffic signals are remotely monitored and respond to live traffic conditions at peak times to optimise traffic flow. Our network of traffic signals are subject to ongoing monitoring and fault identification to make sure they are working as efficiently as possible</p> <p>All access to property will be maintained if restrictions were to be put in place.</p> <p>It is not practical for a Civil Enforcement Officer to be used for such a long extent and 24/7.</p>

Name / road	Objection / feedback	Officer's response
	<p>As one of the Councillors for Rainham South East, I wish to object formally to the proposal for a red route along the A2 in Rainham, for the following reasons: -</p> <ol style="list-style-type: none"> 1. It will have a seriously adverse effect on the shopping centre, which is already finding it hard to keep going in the current economic climate. 2. No real case has been made for its introduction. 3. I have never seen any holdups caused by parked vehicles. 4. Such congestion as there is at peak times is caused by the continual addition of houses in Rainham and Swale and the new Academy, which simply asks too much a road which is single way in both directions. 5. Local people have made it clear that they just don't want it and surely the public have a right to be properly heard! <p>Regards</p>	<p>Objection noted.</p> <p>Reducing congestion in Medway is a key objective set out in both the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network. Among others this includes remote connectivity of our traffic signals in town centres to allow monitoring and response to live traffic condition to optimise traffic flow, a dedicated team that manage and co-ordinate essential road works across the network, individual highway improvement schemes and the Safer Healthier Streets programme.</p> <p>The Safer, Healthier, Streets Programme includes the proposed introduction of Red Routes which aims to help contribute to a better flow of traffic by reducing obstructions such as indiscriminate parking.</p> <p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. Feedback from the public consultation suggest that residents have experienced dangerous and inconvenient parking along the 5 proposed red route locations despite the presence of double yellow line restrictions. The introduction of the red routes will enable more efficient and effective management of the network and reduce obstructions such as indiscriminate</p>

Name / road	Objection / feedback	Officer's response
		<p>parking which will aid towards improve congestion and the safety of the network.</p> <p>Shopping centre parking will not be impacted by the red route.</p> <p>The intention of the public consultation was to understand public opinion, so, if necessary, we could refine the designs to better meet their needs.</p> <p>The project team addressed the concerns of residents and businesses expressed during the engagement period in the updated plans approved by Cabinet. Three loading bays were added to the red route on Rainham High Street, provisions were made for people moving house and our engineers reviewed signage to ensure it was uncluttered.</p> <p>The development of housing sites within the Medway is considered via the planning application process. This process looks at how the application aligns to Medway planning policy and among other things impacts on the local community such as traffic. The development of red routes is a management tool to help the flow of traffic on the network and is not in place to enable or resolve the impact of housing developments.</p>
	<p>I would like to express my disappointment in Medway Council for not listening to the residents of Rainham regarding the proposed red route.</p> <p>The installation of the red route will not ease the traffic along the High Street. It is only occasionally a vehicle is parked to deliver to one of the businesses along there. The majority of the time there is no illegal parking on the already painted double yellow lines. The problem is</p>	<p>Objection noted.</p> <p>The intention of the public consultation was to understand public opinion, so, if necessary, we could refine the designs to better meet their needs.</p>

Name / road	Objection / feedback	Officer's response
	<p>the sheer volume of traffic using the A2, so by painting red lines is not going to help this situation. It is just a waste of money that would be better spent on other areas such as repairing roads.</p>	<p>The project team addressed the concerns of residents and businesses expressed during the engagement period in the updated plans approved by Cabinet. Three loading bays were added to the red route on Rainham High Street, provisions were made for people moving house and our engineers reviewed signage to ensure it was uncluttered.</p> <p>Reducing congestion in Medway is a key objective set out in both the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network. Among others this includes remote connectivity of our traffic signals in town centres to allow monitoring and response to live traffic condition to optimise traffic flow, a dedicated team that manage and co-ordinate essential road works across the network, individual highway improvement schemes and the Safer, Healthier Streets Programme.</p> <p>The Safer, Healthier, Streets Programme includes the proposed introduction of Red Routes which aims to help contribute to a better flow of traffic by reducing obstructions such as indiscriminate parking.</p> <p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. Feedback from the public consultation suggest that residents have experienced dangerous and inconvenient parking along the 5 proposed red route locations despite</p>

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		<p>the presence of double yellow line restrictions. The introduction of the red routes will enable more efficient and effective management of the network and reduce obstructions such as indiscriminate parking which will aid towards improve congestion and the safety of the network.</p>
	<p>I am writing to you, opposing the planned red route along Rainham High Street, A2. I have very rarely, if ever, seen traffic parked along that route. I feel it is a total waste of council money which we pay for. And the up keep of it once it is in place. There are many traffic lights, roundabouts and junctions along that stretch of road so there will always be traffic queues at various points. This proposal will not help to reduce traffic fumes. And there are already double yellow lines along that route. Surely this is sufficient. Thank you for reading.</p>	<p>Objection noted.</p> <p>Reducing congestion in Medway is a key objective set out in both the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network. Among others this includes remote connectivity of our traffic signals in town centres to allow monitoring and response to live traffic condition to optimise traffic flow, a dedicated team that manage and co-ordinate essential road works across the network, individual highway improvement schemes and the Safer Healthier Streets Programme.</p> <p>In the town centres, traffic signals are remotely monitored and respond to live traffic conditions at peak times to optimise traffic flow. Our network of traffic signals are subject to ongoing monitoring and fault identification to make sure they are working as efficiently as possible.</p> <p>The Safer, Healthier, Streets Programme includes the proposed introduction of Red Routes which aims to help contribute to a better flow of traffic by reducing obstructions such as indiscriminate parking.</p>

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		<p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. Feedback from the public consultation suggest that residents have experienced dangerous and inconvenient parking along the 5 proposed red route locations despite the presence of double yellow line restrictions. The introduction of the red routes will enable more efficient and effective management of the network and reduce obstructions such as indiscriminate parking which will aid towards improve congestion and the safety of the network.</p>
	<p>I wish to register my objection to the proposed red route for Rainham. My reasons are: 1) The existing double yellow lines, if enforced, are sufficient to solve any problems. 2) The cost is prohibitively high and quite unnecessary especially now when Medway Council has said that it is so short of funds.</p>	<p>Objection noted.</p> <p>The Safer, Healthier, Streets Programme includes the proposed introduction of Red Routes which aims to help contribute to a better flow of traffic by reducing obstructions such as indiscriminate parking.</p> <p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. Feedback from the public consultation suggest that residents have experienced dangerous and inconvenient parking along the 5 proposed red route locations despite the presence of double yellow line restrictions. The introduction of the red routes will enable more efficient and effective management of the network and reduce obstructions such as indiscriminate parking which will aid towards improve congestion and the safety of the network.</p>

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		<p>All decisions regarding expenditure are made in line with Medway Council's strategic plans. The red routes programme assists the council in meeting the objectives set out in the Medway Council Strategy 2023 to 2024 and the Local Transport Plan.</p>
	<p>I am resending this email as I forgot to add my address.</p> <p>Dear Sirs</p> <p>I am writing to oppose the Red Route in Rainham ME8. It serves no purpose whatsoever as the congestion in Rainham is not about the parking on the A2 as it is about all the road works that are happening in Rainham as well as the road works on the A249.</p> <p>Yours sincerely</p>	<p>Objection noted.</p> <p>Reducing congestion in Medway is a key objective set out in both the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network. Among others this includes remote connectivity of our traffic signals in town centres to allow monitoring and response to live traffic conditions to optimise traffic flow, a dedicated team that manage and co-ordinate essential road works across the network, individual highway improvement schemes and the Safer, Healthier, Streets Programme.</p> <p>In the town centres, traffic signals are remotely monitored and respond to live traffic conditions at peak times to optimise traffic flow. Our network of traffic signals are subject to ongoing monitoring and fault identification to make sure they are working as efficiently as possible.</p> <p>The Safer, Healthier, Streets Programme includes the proposed introduction of Red Routes which aims to help contribute to a better flow of traffic by reducing obstructions such as indiscriminate parking.</p>

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	<p>I wish to object to the Rainham red route for the following reasons: 1) The existing double yellow lines, if enforced, are sufficient . 2) The costs involved are excessive, especially at a time when Medway Council says it is strapped for cash.</p>	<p>Objection noted.</p> <p>Reducing congestion in Medway is a key objective set out in the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network. Among others this includes remote connectivity of our traffic signals in town centres to allow monitoring and response to live traffic conditions to optimise traffic flow, a dedicated team that manage and co-ordinate essential road works across the network, individual highway improvement schemes and the Safer, Healthier Streets Programme.</p> <p>The Safer, Healthier, Streets Programme includes the proposed introduction of Red Routes which aims to help contribute to a better flow of traffic by reducing obstructions such as indiscriminate parking.</p>

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	<p>Why is there a proposed red route for Rainham? The traffic congestion in Rainham has nothing to do with parked cars or cars briefly stopping on the A2.</p> <p>The badly timed traffic lights at the bottom of Mierscourt Road cause a lot of tailbacks. Surely common sense would suggest that the lights should be timed to allow traffic turning right into Mierscourt Road to flow at the same time as traffic from Rainham towards Sittingbourne. At the moment only running the filter light for a short period of time backs traffic up as through traffic gets bottle necked behind vehicles turning right.</p> <p>The sequence should be green and filter Rainham towards Sittingbourne with reds on the other 2 directions, then green light Sittingbourne towards Rainham with the other 2 directions on red and</p>	<p>Objection noted.</p> <p>Reducing congestion in Medway is a key objective set out in the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network. Among others this includes remote connectivity of our traffic signals in town centres to allow monitoring and response to live traffic conditions to optimise traffic flow, a dedicated team that manage and co-ordinate essential road works across the network, individual highway</p>

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	<p>then green left and right out of Mierscourt Road with A 2 traffic on reds.</p> <p>Not having a yellow box at the junction of Station Road causes tailbacks as A2 traffic block the traffic trying to turn onto the A2 in both directions.</p> <p>Traffic turning right from the A2 into Orchard Street is still happening and again causes tailbacks.</p> <p>I have not spoken to one person who thinks a red route in Rainham would ease traffic congestion - where is the survey showing numerous parked cars on the A2 causing congestion?</p> <p>The A2 through Rainham is the main route for emergency vehicles and vehicles are daily pulling over to the left to allow emergency vehicles through - if against the will of the people a red route is put in Rainham will cameras be able to distinguish between parked vehicles (which is not something you see on the A2 in Rainham!) and cars pulling over to allow emergency vehicles through?</p> <p>I would like to see the evidence backing up the decision to put a red route in Rainham. Where is the proof congestion is caused by parked cars! Where is the proof air quality will improve given that it is sheer volume of traffic (especially if the Lower Rainham Road or M2 are closed) that goes through Rainham. Where can members of the public view the detailed surveys carried out by the Council when deciding that parked cars are causing traffic congestion necessitating in the requirement of a red route in Rainham?</p> <p>I await your response with interest.</p>	<p>improvement schemes and the Safer, Healthier Streets Programme.</p> <p>In the town centres, traffic signals are remotely monitored and respond to live traffic conditions at peak times to optimise traffic flow. Our network of traffic signals are subject to ongoing monitoring and fault identification to make sure they are working as efficiently as possible.</p> <p>The Safer, Healthier, Streets Programme includes the proposed introduction of Red Routes which aims to help contribute to a better flow of traffic by reducing obstructions such as indiscriminate parking.</p> <p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. Feedback from the public consultation suggest that residents have experienced dangerous and inconvenient parking along the 5 proposed red route locations despite the presence of double yellow line restrictions. The introduction of the red routes will enable more efficient and effective management of the network and reduce obstructions such as indiscriminate parking which will aid towards improve congestion and the safety of the network.</p> <p>As part of the Council's Moving Traffic programme, camera enforcement of several moving traffic offences, including the right hand turn at Orchard Street, will start in early 2024.</p> <p>Red routes will not apply to emergency services vehicles, which are free to stop wherever needed.</p>

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		<p>People will not be issued a PCN for stopping if they pull over to let an emergency vehicle pass. They will only be given a PCN if they purposefully stop, load or park on the double red lines. Before a PCN is issued, all footage will be reviewed by a person to ensure this is the case.</p> <p>We understand the comments in regards to the junction of Mierscourt Road and the A2 and are aware that this can be the cause of some congestion especially during peak times. The junction has many constraints which makes it difficult to improve without extensive changes or significant investment. We are currently considering ways to improve the traffic congestion at the Mierscourt Road to improve traffic flow through the junction. Plans are currently being accessed using traffic modelling software.</p>
	<p>I write to express and log my concern and objection to the red route in Rainham, it is a waste of money another way to penalise the public, and as I lifelong resident I object to these proposals</p>	<p>Objection noted.</p> <p>All decisions regarding expenditure are made in line with Medway Council's strategic plans. The red routes programme assists the council in meeting the objectives set out in the Medway Council Strategy 2023 to 2024 and the Local Transport Plan.</p>
	<p>Hi</p> <p>Can you provide details of how the side roads along the A2 High Street Rainham will be monitored and protected from an overflow of cars and vans that will be pushed off the main road onto the smaller side roads?</p> <p>I have real concerns for Ashurst Place where I am resident and which already suffers from inconsiderate parking at the junction with A2 High Street making it very difficult to access the road from the high</p>	<p>Objection noted.</p> <p>Ashurst Place is a private road and therefore Medway Council are unable to add or enforce any parking restrictions on it.</p>

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	<p>street, it is frequently blocked by cars who are utilising the services close by, the red Route will cause more cars and vans onto the side routes. I note that on the draft maps that the red lines will not be implemented for a short distance up Ashurst Place but will for the other side roads. Why is this and how will the additional road use of Ashurst Place be monitored and managed?</p> <p>Thanks in advance for your response.</p>	
	<p>I have to say that I fully support the red routes and just wish that they were on the whole length of the single carriageway A2 running through the Medway towns.</p> <p>Anything that prevents what is already illegal parking on double yellow lines and obstructing pavements. Time the ignorant few self-righteous car driver who think that they have the right to do what they want on the roads and pavements got penalised for law breaking.</p>	<p>Support noted.</p> <p>Request to extend noted.</p>
	<p>I wish you make an objection to the proposed red routes in Rainham. This will not resolve traffic conditions as the congestion is not being caused by parked vehicles.</p> <p>Road closures in the surrounding area & the constant road works over & over in the same spots along with the traffic lights not being sequenced properly are the true cause. In addition to this, the quantity of new houses being allowed to be built in the area with no thought to the volume of traffic added to the existing road infrastructure has been a major cause of congestion. A red route will only make it more difficult for the small local businesses & do nothing to ease congestion or improve the environment but will be a waste of tax payers/council tax money! Please put this proposal in the bin!</p>	<p>Objection noted.</p> <p>Reducing congestion in Medway is a key objective set out in the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network. Among others this includes remote connectivity of our traffic signals in town centres to allow monitoring and response to live traffic conditions to optimise traffic flow, a dedicated team that manage and co-ordinate essential road works across the network, individual highway improvement schemes and the Safer, Healthier Streets Programme.</p>

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		<p>The Safer, Healthier, Streets Programme includes the proposed introduction of Red Routes which aims to help contribute to a better flow of traffic by reducing obstructions such as indiscriminate parking.</p> <p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. Feedback from the public consultation suggest that residents have experienced dangerous and inconvenient parking along the 5 proposed red route locations despite the presence of double yellow line restrictions. The introduction of the red routes will enable more efficient and effective management of the network and reduce obstructions such as indiscriminate parking which will aid towards improve congestion and the safety of the network.</p> <p>The project team spoke to more than 60 businesses in the public consultation period and added three new loading bays along Rainham High Street to ensure the red route would not negatively impact their activities. Once the plans had been updated, we returned to the High Street and spoke to more than 60 businesses to ensure the position of the loading bays would meet their needs.</p> <p>All decisions regarding expenditure are made in line with Medway Council's strategic plans. The red routes programme assists the council in meeting the objectives set out in the Medway Council Strategy 2023 to 2024 and the Local Transport Plan.</p>

Name / road	Objection / feedback	Officer's response
	<p>I am writing to register my objection to the proposed Red Route for Rainham High Street. This is complete madness. It would do nothing to help traffic flow through Rainham (perhaps you could organise the never-ending roadworks better) and has absolutely no rationale beyond catching motorists out and raking in money. My experience as a motorist is that if you are unlucky to be caught in a traffic holdup you usually get through it within a few minutes. What you are proposing is a very expensive sledgehammer to crack a nut.</p> <p>We live in a democracy so it would be good if you listened to us and called off this absurd idea instead of pushing us aside and pressing on regardless.</p>	<p>Objection noted.</p> <p>Reducing congestion in Medway is a key objective set out in the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network. Among others this includes remote connectivity of our traffic signals in town centres to allow monitoring and response to live traffic conditions to optimise traffic flow, a dedicated team that manage and co-ordinate essential road works across the network, individual highway improvement schemes and the Safer, Healthier Streets Programme.</p> <p>The Safer, Healthier, Streets Programme includes the proposed introduction of Red Routes which aims to help contribute to a better flow of traffic by reducing obstructions such as indiscriminate parking.</p> <p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. Feedback from the public consultation suggest that residents have experienced dangerous and inconvenient parking along the 5 proposed red route locations despite the presence of double yellow line restrictions. The introduction of the red routes will enable more efficient and effective management of the network and reduce obstructions such as indiscriminate parking which will aid towards improve congestion and the safety of the network.</p>

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		<p>The intention of the public consultation was to understand public opinion, so, if necessary, we could refine the designs to better meet their needs.</p> <p>The project team addressed the concerns of residents and businesses expressed during the engagement period in the updated plans approved by Cabinet. Three loading bays were added to the red route on Rainham High Street, provisions were made for people moving house and our engineers reviewed signage to ensure it was uncluttered.</p>
	<p>Dear whom it may concern</p> <p>On behalf of all three Rainham North ward councillors, we object to the above red route notice as placed to statutory consultation. Our views have now changed since the Regeneration, Culture and Environment Overview and Scrutiny committee, and this continues to have considerable concern amongst residents and businesses.</p>	<p>Objection noted.</p>
	<p>My name is [redacted] - my address is [redacted]. I work in Bloors Lane in Rainham (ME8 7EG) and regularly drive along the proposed red route.</p> <p>The traffic congestion is not caused by parked vehicles. It is generally caused by the inadequacy of the junction at Mierscourt Road or by somebody trying to turn right into Orchard Street. The number of pedestrian crossings is also ridiculous - you don't need one every 50 yards!</p> <p>Installing a red route will not ease congestion and will cause difficulties for businesses along the route and for people trying to use the Healthy Living Centre.</p> <p>I object to the proposed Red Route</p>	<p>Objection noted.</p> <p>We understand the comments in regards to the junction of Mierscourt Road and the A2 and are aware that this can be the cause of some congestion especially during peak times. The junction has many constraints which makes it difficult to improve without extensive changes or significant investment. We are currently considering ways to improve the traffic congestion at the Mierscourt Road to improve traffic flow through the junction. Plans are currently being accessed using traffic modelling software.</p>

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	<p>Regards</p>	<p>We have proposed further loading bays along Rainham High Street for business.</p> <p>Blue Badge holders and licenced taxis can stop on a red route to pick up or drop someone off, if they move promptly – which would include out the front of the Healthy Living Centre.</p> <p>Emergency services are exempt from red routes, so would be able to park out the front of the centre if required.</p> <p>For others needing to access the Healthy Living Centre, there is a car park at the rear of the property. While there is a barrier, the centre has an intercom where drivers can request access to enable drop off.</p>
	<p>Please add these points to my prior objection for the Rainham Traffic Regulation Order, as I only recently gained access to the detailed drawings.</p> <p>Please note that in a detailed study of the route map for Rainham noted as Final November 2023, the parking space that is clearly illustrated by Google Maps outside Chapel Row (192?) appears now to have been lost, as the double red lines extend a number of meters further around the corner. This clearly regularly used and cannot just be removed without consultation with the owner of that property.</p> <p>In addition, having reviewed the positioning of the additional loading bays (outside Poultons and Outside Lukehurst) I would question whether these changes have been consulted with Aviva as has been claimed. The implication for buses if those loading bays are occupied could be considerable and may no longer provide facility for multiple buses.</p>	<p>Objection noted</p> <p>Statutory consultation was carried out as required legally. TRO consultations are undertaken throughout each year in the same manner as prescribed, and the statutory details are provided on the public notices; the red routes scheme is no different, except that wider and more extensive engagement took place prior to the statutory process, to raise awareness and understand the detail of the scheme required. With regard to statutory requirements, proposals must be published in the local newspaper – all other measures undertaken by Medway Council are additional.</p> <p>Key stakeholders, including transport operators like Arriva were consulted as part of the design process.</p>

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	<p>Finally, for this consultation to be adequately assessed it is necessary to review the drawings alongside Medway Council's proposed dispensation and exemptions policy. If Luton Borough Council's policies are to be followed it is clear that a raft of trades and services to shops / businesses and residents are not catered for there, e.g. Carers, Tesco/Sainsbury's, Amazon / DPD, Window cleaners, Florist, home services e.g. roofers / gardeners / plumbers all of which may require access to heavy tools and or building materials.</p> <p>The drawings also currently exclude the positioning and number of cameras to be sited, which is strange as all of the signage proposed (bar those needed for the additional loading bay outside Nationwide) are clearly shown. The aesthetic of the High Street is important, and these should be made available for consultation.</p> <p>Many thanks for accepting this final addition.</p> <p>Rgds</p> <p><i>For full objection – refer page 51.</i></p>	<p>The space proposed as the loading bay outside Lukehurst is currently used as an informal loading opportunity that enables motorist to pull out of the traffic lane with no reported impact to bus services.</p> <p>Congestion in Medway is caused by many factors. Introducing a red route, a measure used by traffic engineers to improve traffic flow, is one tool the council can use to alleviate congestion.</p> <p>We acknowledge your concerns about ensuring the character of Medway is retained, and please be assured, that if implemented, the council will make every effort to preserve the look and feel of the area alongside the existing traffic infrastructure. As part of any implementation we shall look to co-exist signage and equipment to ensure the area is not cluttered.</p> <p>There are no formal parking bays on Chapel Row. The existing double yellow lines on the junction will be red, Medway do not intent to extend these into the junction or reduce parking capacity.</p> <p>Medway Council enlisted the support of specialist consultants to assist in the delivery of camera installation and enforcement via strict procurement policy. Positions of the camera sites have not been determined, and subject to change to enable effective enforcement.</p> <p>Delivery drivers will still be able to access any private properties, retail or hospitality businesses, they will just need to use formal loading and parking bays. All current parking and loading bays will be maintained, with three additional bays being introduced as part of the proposal. Further to this and as a result of community feedback, businesses</p>

Name / road	Objection / feedback	Officer's response
		<p>and residents can apply for a one-off exemption if they are receiving a large delivery.</p> <p>The initiative is proposed to help reduce indiscriminate parking and number of idling vehicles. This will help to reduce emissions and the associated impacts on air quality locally.</p>
	<p>I object to the Statutory Consultation for the Red route planned for Rainham and would like my objections to be recorded as detailed in the attached document. I believe the process that has been carried out to date has been flawed and amounts to a failure to properly consult and does not follow the Gunning principles. The sample copy of the brochure provided for the initial consultation does not even include details of the Rainham plans. A Red route on free flowing roads might work on roads congested for other reasons it will not. It almost seems like the dates chosen for the consultation covering summer holidays and Christmas time are designed to limit the responses. These proposals affect people living in all of Rainham so should have been communicated to the whole ME8 postcode area not a 1km radius.</p> <p>I regularly walk, cycle, run and drive along this route which gives a very good insight into the issues. Congestion will not be reduced by red routes when congestion is due to the volume of vehicles directed into a narrow pinch point on the A2 with 5 sets of traffic lights nor will it reduce idling and slow moving traffic for the same reasons. These signal controlled crossings indicate that this is a pedestrian zone and equal priority needs to be given to pedestrians not just cars.</p> <p>My full objections are fully detailed in the attached PDF document with a summary below. Attached files.</p> <p>1) A2 outside White Horse showing how bus stop blocks the road 2) A2 outside Lukehurst showing how adding a new loading bay will reduce width and cause delays from vehicles turning right</p>	<p>Objection noted.</p> <p>In July 2023, public engagement commenced on the red routes proposal.</p> <p>The intention of the public consultation was to understand public opinion, so, if necessary, we could refine the designs to better meet their needs. All proposed plans were publicly available via the Council website, which were published via social media, press, council mailing this and through direct mail to impacted businesses and residents. Initial consultation materials also included a stylised map to outline the proposed changes.</p> <p>The project team addressed the concerns of residents and businesses expressed during the engagement period in the updated plans approved by Cabinet. Three loading bays were added to the red route on Rainham High Street, provisions were made for people moving house and our engineers reviewed signage to ensure it was uncluttered.</p> <p>Further engagement was undertaken with businesses regarding these changes, to confirm the amends were appropriate.</p> <p>Following this, Statutory Consultation was undertaken in Nov/Dec 2023 in line with requirements.</p>

Name / road	Objection / feedback	Officer's response
	<p>3) A2 outside 45/47 showing bus stop. Parking/loading bay will be immediately in front of this.</p> <p>4) A2 outside 45/47 showing bus reaching centre of the road. This is without the parking/loading bays in place so demonstrates it will not be able to pull away without crossing lanes.</p> <p>TRO Purpose Invalid</p> <p>The TRO must have a valid purpose to be implemented. The Red Route plan template appears to be copied from the one implemented in Luton - maybe due to Alex Constantinides also being the person who implemented that scheme. However, copying the benefits for the Luton scheme doesn't mean they are applicable to Rainham. Red routes on an airport approach road are entirely logical, on a road with congestion caused by other factors not so much. In case of doubt for copying the Luton TRO, the Rainham TRO even refers to Luton Borough Council in one place. There is no evidence to demonstrate that the Luton factors are relevant here.</p> <p>Current traffic congestion on the A2 in Rainham is due to the restricted road width and 5 sets of traffic lights not parked vehicles so a red route will have no impact on improving the flow of traffic through the town and is therefore a complete waste of money. There appears to be no cost/benefit analysis carried out for this scheme. This would appear to be contrary to the Statutory purpose of the scheme to keep traffic moving which has not been assessed and when it will give no improvement on that. The summary of the consultation states "Perception traffic congestion is caused by traffic volumes, roadworks, or traffic lights". For local residents that know the area this is quite insulting. This is more than perception and absolutely no evidence is provided in the documents to justify any alternative view.</p> <p>The Red Route proposal claims the following benefits.</p> <ul style="list-style-type: none"> • Reduce congestion, making journeys more reliable • Prevent illegal and unsafe parking and driving 	<p>We understand the comments in regards to the junction of Mierscourt Road and the A2 and are aware that this can be the cause of some congestion especially during peak times. The junction has many constraints which makes it difficult to improve without extensive changes or significant investment. We are currently considering ways to improve the traffic congestion at the Mierscourt Road to improve traffic flow through the junction. Plans are currently being accessed using traffic modelling software.</p> <p>Additionally in the town centres, traffic signals are remotely monitored and respond to live traffic conditions at peak times to optimise traffic flow. Our network of traffic signals are subject to ongoing monitoring and fault identification to make sure they are working as efficiently as possible.</p> <p>The additional loading bay at 45-47 and out the front of Lukehurst are adjacent to the traffic lane and allow motorist to safely pull off the road and park.</p> <p>As road hatchings will be altered to enable new loading bay at 45-47 High Street. A road safety audit was conducted on proposed design change. New loading bay is compliant.</p> <p>The carriageway width is wide enough accommodate the third loading bay outside Nationwide building and still provide a 2m of running lane. This means that road users including cyclists are able to move around the occupied loading bay without impinging in the eastbound lane. Further to this, loading/unloading can only take place between 10am-4pm and 6pm-6am,</p>

Name / road	Objection / feedback	Officer's response
	<ul style="list-style-type: none"> • Decrease idling and slow-moving traffic, a key contributor to poor air quality • Reduce delays on essential services such as public transport and blue light services. <p>Yet there is no supporting documentation or evidence to back these claims up and it appears that the decision has already been made to implement despite the majority views of local residents opposing the scheme. With 5 sets of traffic lights there is no way that slow moving and idling traffic will be decreased. Again, these benefits are copied from the Luton proposals but interestingly exclude improvements to cycling which would be key to reducing congestion.</p> <p>Making illegal parking now legal loading bays will solve none of the congestion problems if illegally parked cars was the cause. By creating loading bays in the same location, it strongly implies that this is not going to change traffic flows.</p> <p>I am happy to meet any of those involved in the design of the scheme on site to demonstrate the current issues and the lack of impact that a red route will have in improving this.</p> <p><i>For full objection – refer page 59.</i></p>	<p>therefore keeping the carriageway free flowing during time when traffic is at its heaviest.</p> <p>No pedestrian crossings will be impacted under the proposal. They will remain in place to provide safe passage for people to cross the high street. Removal of indiscriminate parking will also help to improve sightlines for both drivers a pedestrians when crossing the road.</p> <p>The draft traffic order includes reference to Luton Borough Council in two Articles, which have no effect and will be removed if the order is subsequently finalised and 'made'. As there are red routes successfully operating in other parts of the country it is unnecessary to draft an order from scratch and we do engage with other authorities to ensure a similar approach is taken.</p> <p>Any revenue raised from the Penalty Charge Notices issued to motorists who illegally park or stop will be reinvested back into our streets to improve our road network. The funds generated from fines can only to be used for this purpose.</p> <p>All decisions regarding expenditure are made in line with Medway Council's strategic plans. The red routes programme assists the council in meeting the objectives set out in the Medway Council Strategy 2023 to 2024 and the Local Transport Plan.</p> <p>Camera locations have not been determined as yet. That is part of the next phase of the implementation. Cameras will be moved around all sites, however, the rotation is yet to be decided.</p> <p>The initiative is proposed to help reduce indiscriminate parking and number of idling</p>

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		vehicles. This will help to reduce emissions and the associated impacts on air quality locally.
	<p>Dear [redacted]</p> <p>Re: Representations opposing Rainham High Street Red Route on behalf of local residents as the Member of Parliament for Gillingham and Rainham.</p> <p>I am writing to you to further outline my complete opposition to the imposition of red route traffic restrictions in Rainham High Street by the Labour-led Medway Council further to my letter to the Leader of Medway Council on this matter during the public consultation phase on 26th July 2023. Please find a copy of this letter enclosed.</p> <p>Hundreds of local residents who live either on or in close proximity to Rainham High Street responded in their hundreds to the consultation in July, a very clear majority of more than 60% making it clear that they were opposed to the imposition of a red route in Rainham High Street.</p> <p>As I advised the Leader of the Labour-led Council, these proposals would have a real negative impact on many of our hardworking businesses and would damage the business community in the wider area. It must be noted as the traffic order states, red route controls would not apply to just Rainham High Street between the junction with Maidstone Road and 249 High Street, Rainham, but red route controls would also apply to all adjoining side-roads between these two points, on both sides of the road, for up to 20 meters from the High Street. Most of these neighbouring roads affected are residential rather than commercial, and where there are currently parking places in the effected parts of these side roads, they are to be removed by the traffic order. This is completely unacceptable.</p> <p>Local residents raised real concerns regarding the red route to the consultation in July in how these proposals may impact upon them. Labour-led Medway Council in having progressed their red-route policy to this stage means that these have not been listened to which is also completely unacceptable.</p> <p>I would therefore urge, in this matter being considered for adoption under a traffic order, that the clear wishes of the community and</p>	<p>Objection noted.</p> <p>Red routes restrictions will go into side roads only at the junctions. This is to help keep junctions clear of park vehicles to improve traffic flow and sightlines for those entering / existing onto Rainham High Street. No parking will be lost as part of the restrictions on the High Street or on side roads.</p> <p>Only adjoining side roads which have current double yellow line restrictions on the junctions will be changed to red route restrictions.</p> <p>The intention of the public consultation was to understand public opinion, so, if necessary, we could refine designs to better meet their needs.</p> <p>The project team addressed the concerns of residents and businesses expressed during the engagement period in the updated plans approved by Cabinet. Three loading bays were added to the red route on Rainham High Street, provisions were made for people moving house and our engineers reviewed signage to ensure it was uncluttered.</p>

Name / road	Objection / feedback	Officer's response
	<p>myself as their Member of Parliament are taken into account and that the Rainham red route proposal is rejected.</p> <p>Yours ever</p>	
	<p>Hi there,</p> <p>I hope I am in time in giving my feedback. I am broadly in support of the proposals, as drivers in Rainham frequently park near the on the white lines near the pedestrian crossings, which is dangerous to those who want to use the crossings. I also welcome the addition of new loading bays near the Cricketers pub, and hope this will make it easy for businesses to get deliveries made.</p> <p>I have two specific pieces of feedback though:</p> <ul style="list-style-type: none"> • Vehicles frequently park on the pavement outside the Healthy Living Centre, including delivery vehicles and ambulances doing pickups. This is because after the centre was opened a barrier has been installed in the car park at the rear of the property, preventing access. As no specific loading area has been added to the front, is the intention for vehicles like these to use the parking facility at the rear of the property? • There is no specific loading bay near the Post Office, and so businesses expecting deliveries in that area will need to hope that they can get one of the available spots in the public access bay <p>Many thanks</p>	<p>Comment noted.</p> <p>Formal parking bays are already located near the entry of the Post Office out the front of 117 Rainham High Street. The introduction of red routes will not impact these current bays as there will be no changes to the number of bays or parking restriction timings.</p> <p>Red routes will not apply to emergency services vehicles, which are free to stop wherever needed.</p> <p>Blue Badge holders and licenced taxis can stop on a red route to pick up or drop someone off, if they move promptly – which would include out the front of the Healthy Living Centre.</p> <p>For those needing to access the Healthy Living Centre, there is a car park at the rear of the property. While there is a barrier, the centre has an intercom where drivers can request access to enable drop off.</p>
	<p>Dear sirs,</p> <p>I strongly object to the Rainham Red Route scheme on the following grounds:</p> <p>1. The detrimental and disproportionate effect of the red route on local businesses, particularly with regard to access for deliveries and tradesman.</p>	<p>Objection noted.</p> <p>The project team spoke to more than 60 businesses in the public consultation period and added three new loading bays along Rainham High Street to ensure the red route would not negatively impact their activities. Once the plans had been updated, we returned to the High Street and spoke to more</p>

Name / road	Objection / feedback	Officer's response
	<p>2. No evidence provided on whether a red route scheme can or will improve air quality.</p> <p>3. Parking or stopping on the A2 High Street is a minimal issue which is not the root cause of congestion. Furthermore, the A2 High Street is already a zero tolerance parking enforcement area.</p> <p>4. There are concerns about accessing shop forecourts and that residents parking may result in fines when vehicles have to briefly wait to reverse.</p> <p>5. Resources and efforts should be focused on improving the Mierscourt Road right turn, better traffic light sequencing, and better management and oversight of roadworks.</p> <p>Regards</p>	<p>than 60 businesses to ensure the position of the loading bays would meet their needs.</p> <p>Delivery drivers will still be able to access any private properties, retail or hospitality businesses, they will just need to use formal loading and parking bays. All currently parking and loading bays will be maintained, with three additional bays being introduced.</p> <p>Reducing congestion in Medway is a key objective set out in the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network. Among others this includes remote connectivity of our traffic signals in town centres to allow monitoring and response to live traffic conditions to optimise traffic flow, a dedicated team that manage and co-ordinate essential road works across the network, individual highway improvement schemes and the Safer, Healthier Streets Programme.</p> <p>The Safer, Healthier, Streets Programme includes the proposed introduction of Red Routes which aims to help contribute to a better flow of traffic by reducing obstructions such as indiscriminate parking.</p> <p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. Feedback from the public consultation suggest that residents have experienced dangerous and inconvenient parking</p>

Name / road	Objection / feedback	Officer's response
		<p>along the 5 proposed red route locations despite the presence of double yellow line restrictions. The introduction of the red routes will enable more efficient and effective management of the network and reduce obstructions such as indiscriminate parking which will aid towards improve congestion and the safety of the network.</p> <p>The purpose of the scheme is to help improve safety on the road network and reduce congestion. This is not focused on being an air quality intervention however, reductions in congestion and idling cars will not contribute further to air quality issues.</p> <p>People will not be issued a PCN for stopping as they wait to park in a shop forecourt, as long as they pull in as quickly as possible to ensure traffic can continue moving. They will only be given a PCN if they purposefully stop, load or park on the double red lines. Before a PCN is issued, all footage will be reviewed by a person to ensure this is the case.</p> <p>The Council is currently considering ways to improve the traffic congestion at the Mierscourt junction. The council is considering options for making changes to the road layout, to improve traffic flow through the junction. Plans are currently being accessed using traffic modelling software.</p>
	<p>As a local resident I would like to register my full support for this proposal.</p> <p>Being retired, and now attempting to walk, use both public transport and cycle more in the Council-recognised climate emergency, I welcome the Rainham red route for 2 main reasons:</p> <ol style="list-style-type: none"> 1. Cycling and walking this stretch of the A2 will be made much safer. 	<p>Support noted.</p>

Name / road	Objection / feedback	Officer's response
	<p>2. Pressures put on National Cycle Route 1 by 'rat runners' using Otterham Quay Lane, Wakeley Road, Taswell Rd, Henry St, Station Rd, Childscroft Rd and Berengrave Lane will be lessened, helping to make safer for pedestrians/cyclists.</p>	
	<p>1. The consultation process and documentation has been made as cumbersome as possible, at a time of year when people are distracted with Christmas preparations. The documents omit key design details of the proposed additional lay-by outside the Nationwide Building Society, which will make matters less safe for cyclists and more difficult for public transport. The fact that nobody in the chain of command, or the portfolio holders have bothered to actually read the TRO documents is evident, in that they continue to reference Luton Borough Council on page 6, a prior employer of the architect of the scheme. Rainham is totally unlike Luton in Bedfordshire.</p> <p>2. The statutory purpose claimed "maintaining the free flow of traffic" is entirely flawed and lacks any objective evidence. There is plenty of evidence to support other crucial impediments to the free flow through Rainham High Street, not least 5 sets of traffic lights and a major pinch point at Miers Court Road. This is a money making scheme, as no authority would gamble £805,000 on benefits that are entirely unproven - this is profligacy at a time of such financial difficulties.</p> <p>3. The potential damage to residents and businesses in Rainham cannot be understated. Design alterations have been hastily positioned without adequate consultation and any beyond the post office (heading East) have largely been ignored. This should be considered as an area or heritage importance to Rainham, yet it will soon be festooned with approx. 30 new road traffic signs and many CCTV cameras.</p>	<p>Objection noted.</p> <p>All decisions regarding expenditure are made in line with Medway Council's strategic plans. The red routes programme assists the council in meeting the objectives set out in the Medway Council Strategy 2023 to 2024 and the Local Transport Plan.</p> <p>The draft traffic order includes reference to Luton Borough Council in two Articles, which have no effect and will be removed if the order is subsequently finalised and 'made'. As there are red routes successfully operating in other parts of the country it is unnecessary to draft an order from scratch and we do engage with other authorities to ensure a similar approach is taken.</p> <p>Reducing congestion in Medway is a key objective set out in the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network. Among others this includes remote connectivity of our traffic signals in town centres to allow monitoring and response to live traffic conditions to optimise traffic flow, a dedicated team that manage and co-ordinate essential road works across the network, individual highway</p>

Name / road	Objection / feedback	Officer's response
		<p>improvement schemes and the Safer, Healthier Streets Programme.</p> <p>The Safer, Healthier, Streets Programme includes the proposed introduction of Red Routes which aims to help contribute to a better flow of traffic by reducing obstructions such as indiscriminate parking.</p> <p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. Feedback from the public consultation suggest that residents have experienced dangerous and inconvenient parking along the 5 proposed red route locations despite the presence of double yellow line restrictions. The introduction of the red routes will enable more efficient and effective management of the network and reduce obstructions such as indiscriminate parking which will aid towards improve congestion and the safety of the network.</p> <p>The project team addressed the concerns of residents and businesses expressed during the engagement period in the updated plans approved by Cabinet. Three loading bays were added to the red route on Rainham High Street, provisions were made for people moving house and our engineers reviewed signage to ensure it was uncluttered.</p> <p>The project team spoke with the post office regarding loading concerns. Formal parking bays are already located near the entry of the Post Office out the front of 117 Rainham High Street. The introduction of red routes will not impact these</p>

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		current bays as there will be no changes to the number of bays or parking restriction timings.

Name / road	Objection / Feedback	Officer's responses
	<p>Good morning, Kent Police have no specific observations to make regarding the waiting restriction proposals, however in general terms we would expect the following:</p> <ul style="list-style-type: none"> • The application meets the necessary criteria • The introduction or removal of Parking restrictions complies in all respect with the Traffic Signs Regulations and General Directions 2016 • The introduction of such measures will not leave the Police with the task of carrying out constant enforcement issues • The safety of other road users is not compromised by the introduction of these measures <p>Civil Parking Enforcement will require Local Authority to ensure resources are available to enforce these proposals. Our reference for your proposals is 315/23 Kind Regards,</p>	<p>Medway Council will implement the scheme in accordance with items noted by Kent Police</p>
	<p>To whom it may concern.</p> <p>There is insufficient evidence and or justification for imposing an unnecessary red route misunderstood use of a red route.</p> <p>You are misusing the red route criterion for financial gain. Traffic doesn't stop along this route and blockages are not due to parking just sheer volume. The red route will have effect at all .</p> <p>To impose such financial penalties in utilities and companies etc is unacceptable.</p> <p>There is absolutely no proof that drawing two red lines on a road will change the volume of traffic. Repairing pot holes and tarmac generally would be a better use of funding. Please concentrate on sensible systems of traffic management. Think the bigger picture.</p>	<p>Objection noted.</p> <p>Reducing congestion in Medway is a key objective set out in both the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network. Among others this includes the traffic management team that manage and co-ordinate essential road works across the network, individual improvement schemes and the safer healthier streets programme.</p> <p>Additionally in the town centres, traffic signals are remotely monitored and respond to live traffic conditions at peak times to optimise traffic flow. Our</p>

Name / road	Objection / Feedback	Officer's responses
		<p>network of traffic signals are subject to ongoing monitoring and fault identification to make sure they are working as efficiently as possible.</p> <p>The Safer, Healthier, Streets Programme includes the proposed introduction of Red Routes which aims to help contribute to a better flow of traffic by reducing obstructions such as indiscriminate parking.</p> <p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. Feedback from the public consultation suggest that residents have experienced dangerous and inconvenient parking along the 5 proposed red route locations despite the presence of double yellow line restrictions. The introduction of the red routes will enable more efficient and effective management of the network and reduce obstructions such as indiscriminate parking which will aid towards improve congestion and the safety of the network.</p>
	<p>To whom it may concern.</p> <p>Please may I have copies of the proposed Orders, the Council's statement of reasons for making the Orders, and of plans showing their effect?</p> <p>From all information seen to date and knowing the area personally I cannot see how this proposal will have any positive impact on the existing road network. Any congestion on the proposed routes is due to excessive house building and poorly timed roadworks, nothing to do with parked or stopped vehicles.</p> <p>Regards</p>	<p>Noted.</p> <p>Copies of TROs sent during consultation period to enable individual to review and make comment further.</p> <p>The development of housing sites within the Medway is governed by the planning application process. This process looks at how the application matches against Medway planning policy and among other things impacts on the local community such as traffic. The development of red routes it a</p>

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		management tool to help the flow of the network and is not in place to enable or resolve the impact of housing developments.
	<p>Hi team Please would you send me details for order traffic order out for consultation at the moment including the feasibility study and any relevant documentation.</p> <p>The Medway Council (Rainham) (Red Route) Traffic Order 202* The Medway Council (Rainham North) (Parking Places and Waiting, Loading and Stopping Restrictions) (Amendment No. -) Order 202* The Medway Council (Rainham South) (Parking Places and Waiting, Loading and Stopping Restrictions) (Amendment No. -) Order 202*</p> <p>Best wishes</p>	<p>Noted.</p> <p>Copies of TROs sent during consultation period to enable individual to review and make comment further.</p> <p>No formal consideration needed.</p>
	<p>Dear Sir At, this time when Medway Council is struggling to find the money to meet its obligations, the proposed Red Routes are a waste of money and will not speed up the traffic.</p>	<p>Objection noted.</p> <p>All decisions regarding expenditure are made in line with Medway Council's strategic plans. The red routes programme assists the council in meeting the objectives set out in the Medway Council Strategy 2023 to 2024 and the Local Transport Plan.</p> <p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. Feedback from the public consultation suggest that residents have experienced dangerous and inconvenient parking</p>

Name / road	Objection / Feedback	Officer's responses
		<p>along the 5 proposed red route locations despite the presence of double yellow line restrictions. The introduction of the red routes will enable more efficient and effective management of the network and reduce obstructions such as indiscriminate parking which will aid towards improve congestion and the safety of the network.</p>
	<p>Dear sirs. In this economic crisis wherein, we have a situation of KCC under threat of going bankrupt & Medway having a financial "shortfall" of around 17 Million, how can the council even consider waiting 805k of this total waste of council tax payers money. I'm not suggesting that the plan is shelved indefinitely. But once the council has reduced this deficit it can be re considered. Save this money, trash this unrealistic farce and reallocate it to a scheme more worthy rather than just painting the existing yellow lines red & annoying many businesses & motorists to boot.</p> <p>If the council does know how to do something its waste money.... like the foot/cycle path farce on four Elms Hill... over run by weeks, caused unbelievable traffic backlog & know doubt wasn't completed on budget and only weeks after completion and lovely new tarmac laid, its dug up to allow the repositioning of a speed limit sign that had illumination above it.... Couldn't the council have targeted work so this was done before the tarmac was laid.</p>	<p>Objection noted.</p> <p>All decisions regarding expenditure are made in line with Medway Council's strategic plans. The red routes programme assists the council in meeting the objectives set out in the Medway Council Strategy 2023 to 2024 and the Local Transport Plan.</p> <p>Feedback received during the informal consultation was used to review proposals to make sure they met the needs of impacted communities. As a result of feedback and concerns for lack of loading opportunities particularly for businesses, Council Officers altered the proposals to include 2 additional loading bays.</p>
	<p>Hi</p> <p>Please can you email copies of the proposed Orders, the Council's statement of reasons for making the Orders, and of plans showing their effect for red routes for Rochester, Chatham and Rainham as per the consultation.</p> <p>Many thanks</p>	<p>Copies of TROs sent during consultation period to enable individual to review and make comment further.</p> <p>No formal consideration needed.</p>

Name / road	Objection / Feedback	Officer's responses
	<p>Please send copies of the three orders together with the council's reasoning and the plans showing effects to this email address.</p>	<p>Copies of TROs sent during consultation period to enable individual to review and make comment further.</p> <p>No formal consideration needed.</p>
	<p>Please could you forward a copy of all the electronic TRO document sets associated with Red Routes for Medway (Rainham, Chatham and Rochester).</p> <p>Thank you</p>	<p>Copies of TROs sent during consultation period to enable individual to review and make comment further.</p> <p>No formal consideration needed.</p>
	<p>Dear Sirs</p> <p>I would be very grateful if I could be provided electronic copies at the earliest opportunity of the Local Authority's proposed Orders, statement of reasons for making the Orders, and of plans showing their effect in relation to Traffic Order 202.</p> <p>Thank you for your help, I look forward to hearing from you.</p> <p>Best Regards,</p>	<p>Copies of TROs sent during consultation period to enable individual to review and make comment further.</p> <p>No formal consideration needed.</p>
	<p>Dear Sirs</p> <p>I believe I completed a form/questionnaire objecting to the 'Medway Red Route.' However, I have not received an acknowledgement and would like to ensure my objection is noted.</p> <p>The routes mentioned are always congested due to the amount of traffic. There would be no benefit in introducing such a system and I have yet to</p>	<p>Objection noted.</p> <p>All respondents received a response to indicate their submissions to the statutory consultation were received. As per statutory requirements, a further response will be sent once a decision has been made by delegated authority.</p>

Name / road	Objection / Feedback	Officer's responses
	<p>see anyone blocking the roads. It's a pointless exercise and is a waste of taxpayers' money.</p> <p>Yours faithfully</p>	<p>The Council does not reply to each respondent who completed the online survey as part of informal consultation in July, but all 975 individual responses were carefully analysed. The community's valuable insights were used to refine plans to ensure they meet the needs of the residents and businesses. Outcomes of this input were communicated back to the public via the Council website, and leaflets to impacted residents and businesses.</p> <p>Reducing congestion in Medway is a key objective set out in both the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network.</p> <p>Red Routes are a measure used by traffic engineers to improve traffic flow. It is one tool the council is investing in to help alleviate congestion. It also has other benefits like reducing unsafe and indiscriminate parking.</p>
	<p>Please explain how a council on the verge of bankruptcy can justify spending almost one million pounds on a red route scheme that isn't wanted or needed!!! If you have that much spare cash sloshing around spend it on fixing potholes or properly organising roadworks, which both are an absolute disgrace in this borough!</p>	<p>Objection noted.</p> <p>All decisions regarding expenditure are made in line with Medway Council's strategic plans. The red routes programme assists the council in meeting the objectives set out in the Medway Council Strategy 2023 to 2024 and the Local Transport Plan.</p> <p>Introducing red routes is an effective traffic management tool which enables better enforcement of traffic restrictions through the use of ANPR technology.</p>

Name / road	Objection / Feedback	Officer's responses
		<p>These restrictions will provide several benefits including more effective enforcement of indiscriminate parking which will help to improve road safety and reduce congestion, create less delay on essential bus routes.</p> <p>The enforcement of moving traffic restrictions will contribute to reducing dangerous and indiscriminate driving behaviours improving road safety. Income from PCNs will be used to service the running costs associated with back-office resource, necessary enforcement and capital set up costs of infrastructure and associated ongoing maintenance. Any surplus income is ring fenced to Transport and Highways. Examples of what it can be used for include highway repairs, public transport infrastructure and environmental improvement projects.</p>
	<p>To Whom It May Concern.</p> <p>I write with regards to the subject shown above and the recent article in the Kent online.</p> <p>Please accept this e-mail by way of my personal objection to such a project.</p> <p>I speak from the experience of a resident of Medway of some 30 plus years, having been schooled in Medway before becoming a resident.</p> <p>Your plans will not work, as knowing the roads as I do, their narrow as they are and would be more cause of chaos on the roads for which I am a car user.</p> <p>Your plans during covid where cycle lanes popped up overnight, have been disastrous as no one uses them and more of a nuisance speaking from a car drivers point of view.</p>	<p>Objection noted.</p> <p>Reducing congestion in Medway is a key objective set out in both the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network.</p> <p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. This includes as mentioned, on narrow section of carriageway, where the introduction of the red routes will enable more efficient and effective management of the network and reduce obstructions such as</p>

Name / road	Objection / Feedback	Officer's responses
	<p>If you create the red routes, you're using it as a stalking horse in order to charge motorists more money in fines, and the way the bus fares are priced, no one will take the bus, so you will have empty buses running in the lanes.</p> <p>I trust this e-mail will serve as a vote for NO to the red route project and stop it in its tracks before you cause more misery for the residents of Medway.</p> <p>Regards</p>	<p>indiscriminate parking which will aid towards improve congestion and the safety of the network</p>
	<p>Hi</p> <p>As stated on the Medway Council website below, can you please supply email copies of the TROs that are proposed for the Red Routes in Medway</p> <p>https://www.medway.gov.uk/downloads/file/8497/rainham_red_routes_traffic_order_202</p> <p>Many thanks</p>	<p>Copies of TROs sent.</p> <p>No formal response needed.</p>
	<p>The council is planning on spending a million pounds of taxpayers money when the council is nearly if not already bankrupt. On something that will not reduce the traffic congestion at all.</p> <p>The reason the traffic is so bad around Medway towns is the amount of traffic lights one after another. We do not then need these red routes put in place.</p> <p>Thanks</p>	<p>Objection noted.</p> <p>All decisions regarding expenditure are made in line with Medway Council's strategic plans. The red routes programme assists the council in meeting the objectives set out in the Medway Council Strategy 2023 to 2024 and the Local Transport Plan.</p> <p>Red routes are a common traffic management tool used by highways engineers to improve traffic flow and reduce congestion. It is one of the ways we can</p>

Name / road	Objection / Feedback	Officer's responses
	--	<p>smooth traffic flow without requiring significant changes to the road layout.</p> <p>Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network. Among others this includes the traffic management team that manage and co-ordinate essential road works across the network, individual improvement schemes and the safer healthier streets programme.</p> <p>In the town centres, traffic signals are remotely monitored and respond to live traffic conditions at peak times to optimise traffic flow. Our network of traffic signals are subject to ongoing monitoring and fault identification to make sure they are working as efficiently as possible.</p> <p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. Feedback from the public consultation suggest that residents have experienced dangerous and inconvenient parking along the 5 proposed red route locations despite the presence of double yellow line restrictions. The introduction of the red routes will enable more efficient and effective management of the network and reduce obstructions such as indiscriminate parking which will aid towards improve congestion and the safety of the network.</p> <p>All decisions regarding expenditure are made in line with Medway Council's strategic plans. The red</p>

Name / road	Objection / Feedback	Officer's responses
		<p>routes programme assists the council in meeting the objectives set out in the Medway Council Strategy 2023 to 2024 and the Local Transport Plan.</p>
	<p>To whom it may concern,</p> <p>I totally OBJECT to any Red lines going in Medway. This will ruin businesses . We are not London .</p> <p>Regards</p>	<p>Objection noted.</p>
	<p>This is my formal objection to the proposed red route</p>	<p>Objection noted.</p>
	<p>I reply regarding the above consultation. I have never experienced any vehicles parked on these proposed routes, other than extremely rare occasions. These occasions were both for short and understandable situations none of which caused any traffic problems. Bringing strict and fineable, restrictions are a sledgehammer to crack a nut. More congestion is caused by the appalling general road planning and provision, especially in Strood. It appears that any road panning merely exacerbates the problems you profess to want to reduce. More pollution is caused by this and the never-ending addition of more housing in an already congested area. All this at a cost of £805,000 by a Council that is facing bankruptcy. Estimated costs are always exceeded so a £1,000,000 plus bill is more likely. If you expect to recoup this cost from fines, London charge £160 per offence, it will mean 5,031 fines just to break even and this from very few law-breaking vehicles.</p> <p>The majority of those consulted voted against the scheme, 61% and 974 in Rochester and Chatham, 473 in Rainham. You said you'd honour the vote</p>	<p>Objection noted.</p> <p>All decisions regarding expenditure are made in line with Medway Council's strategic plans. The red routes programme assists the council in meeting the objectives set out in the Medway Council Strategy 2023 to 2024 and the Local Transport Plan.</p> <p>Reducing congestion in Medway is a key objective set out in both the Council Strategy and Local Transport Plan. Reducing congestion is a complex issue caused by a variety of factors that requires a multi-faceted approach and this is why the council is investing in several programmes to improve the flow of the network.</p>

Name / road	Objection / Feedback	Officer's responses
	<p>and yet you may just ignore it. Hardly the democratic success claimed by some Councillors.</p> <p>More road signs are proposed as a benefit when we already have a confusing plethora. Reducing pollution and improving air quality when there are constant traffic jams across Rochester Bridge? It's political, woke drivel, the current flavour of the moment.</p> <p>There are better ways of achieving what you claim to want. Free up the flow of traffic in Rochester and Strood, none of which is caused by parking on existing yellow lines.</p> <p>A complete redesign of Strood Town centre is needed.</p> <p>Stop wasting money on London clone projects.</p> <p>Stop claiming that everything must be done in the name of good health, better air quality, global warming, climate change etc.</p> <p>This Red Route plan is a route to nowhere other than further decent into the black hole of bankruptcy.</p> <p>I OPPOSE THE PLAN.</p>	<p>Among others this includes the traffic management team that manage and co-ordinate essential road works across the network, individual improvement schemes like Strood regeneration and the safer healthier streets programme.</p> <p>The Safer, Healthier, Streets Programme includes the proposed introduction of Red Routes which aims to help contribute to a better flow of traffic by reducing obstructions such as indiscriminate parking.</p> <p>One of the reasons for the proposal of this scheme is that the existing double yellows were originally put in place to stop vehicles parking in locations which would lead to road safety issues or reduce the capacity of the road network. Feedback from the public consultation suggest that residents have experienced dangerous and inconvenient parking along the 5 proposed red route locations despite the presence of double yellow line restrictions. The introduction of the red routes will enable more efficient and effective management of the network and reduce obstructions such as indiscriminate parking which will aid towards improve congestion and the safety of the network.</p> <p>During the informal consultation, respondents were asked not just if they supported the proposal, but also about why they did or did not agree with the proposed red routed programme. This feedback was then used to review proposals to make sure they met the needs of impacted communities. As a result of feedback and concerns for lack of loading opportunities, Council Officers altered the proposals to include 2 additional loading bays.</p>

Name / road	Objection / Feedback	Officer's responses
		<p>The development of housing sites within the Medway is governed by the planning application process. This process looks at how the application matches against Medway planning policy and among other things impacts on the local community such as traffic. The development of red routes is a management tool to help the flow of the network and is not in place to enable or resolve the impact of housing developments.</p>
	<p>Dear Adam</p> <p>As a Gillingham North councillor, I'm excited about the Red Route plans in Rainham, Chatham and Rochester. They're going to make our roads safer and less congested, which is great for everyone. We've also made sure there are spaces for short stays, loading, and disabled parking, considering everyone's needs.</p> <p>Kind Regards</p>	<p>Support noted.</p>
	<p>Dear Sir,</p> <p>I wish to share my support for both of these schemes.</p> <p>I travel around the Medway Towns as a driver and through leisure activities. Congestion caused by inappropriately parked vehicles increases my travel time and I fear that as a result I contribute to the high pollution experienced in the Medway Towns. I don't wish to do as ultimately it adds pressure to the NHS and other public services.</p>	<p>Support noted.</p>

Name / road	Objection / Feedback	Officer's responses
	<p>I would also add that as a runner many of the routes used in the evenings are along these roads because of the public lights and added safety this provides, particularly for females. Running provides many people with the opportunity to gather and helps to reduce mental health instances.</p> <p>My own experiences along Rainham High Street has involved lorries delivering to the fast food outlets blocking the paths. On several occasions I have assisted parents with buggies having to pass these lorries by walking into the A2 road. All of these establishments have rear entries and would be able to accept deliveries.</p> <p>Rainham, Chatham and Rochester have public car parks near to the shops and introducing the red routes might possibly increase footfall by making it easier to drive to and from the area. I would also add that as the A2 is a major route for emergency services I would certainly, if needed, like them to arrive as soon as possible and not be delayed because of inconsiderate drivers.</p> <p>Yours faithfully,</p>	
	<p>Dear sirs.</p> <p>I wish to add my support to the proposal for red routes in Medway, there is no reasonable argument for not having them. They stop illegal and inconsiderate parking and allow a 24-7 coverage should it be needed and does not rely on a traffic warden being in attendance or having to be verbally abused. The suggestion of this having a negative impact on businesses is also wrong, there are plenty of local car parks which can be used by the shops patrons.</p> <p>Kindest regards</p>	Support noted.
	Hello,	Support noted.

Name / road	Objection / Feedback	Officer's responses
	<p>I would like to write in support of the proposals for Red Route Controls in High street Rainham(A2), the Brook(Chatham) and Corporation street, Star Hilland City way (Rochester).</p> <p>These are key routes through Medway, that should be kept as clear as possible to allow the flow of traffic.</p> <p>Best Regards.</p>	
	<p>Good Afternoon,</p> <p>I am writing in support of the above named TROs. Both proposals are sensible, proportionate measures to manage the impacts of illegal loading and waiting activities in the areas defined. I am satisfied with the level of consultation and engagement undertaken and would wish to see these TROs implemented.</p> <p>Kind regards</p>	<p>Support noted.</p>
	<p>Good afternoon,</p> <p>I would like to make representation about both:</p> <p>Chatham and Rochester red routes Traffic Order 202 & Rainham red routes Traffic Order 202.</p> <p>I feel it's important for a number of reasons that these red routes are implemented. Not only are they important to reduce congestion and speed up drive town in those areas. It also really important for air quality in Medway. Air quality as a result of congestion can be avoided and with the impact on people's health, especially they young, it should be a top priority. Enforcement is the only way this can be achieved and most of the residents in this area agree and they would benefit.</p> <p>Thank you.</p>	<p>Support noted.</p>

Name / road	Objection / Feedback	Officer's responses
	Kind regards,	
	<p>Hi,</p> <p>On behalf of the bus operator Arriva, I would like to give our views and feedback on the proposed red routes in Medway.</p> <p>Arriva are the largest bus operator in Medway, and we carry approximately 8.5million passenger journeys a year on our Medway services. Assuming an average vehicle occupancy of 1.1 this is equivalent to 7.7million car journeys annually. Bus reliability and consequential journey speeds are one of the biggest drivers behind our passenger satisfaction which ultimately drives the decision of whether to use the bus or not.</p> <p>Our average scheduled journey speed on our Medway routes is just under 13mph. This is a lot slower at times of peak congestion.</p> <p>We firmly believe that the proposed red routes will reduce traffic congestion and delays to buses and also improve average journey speeds. In terms of the specific routes, we have the following feedback:-</p> <ol style="list-style-type: none"> 1. Corporation Street, Star Hill – We typically serve this section of route with up to 13 buses an hour in each direction. As well as being the core route to serve Rochester, it is also the main link between Chatham and Strood. Delays and disruption on this section of route is very common and the consequential delays to services can be observed in Strood, Grain, and Gravesend. The red route on this section will significantly be of benefit to bus passengers in Medway. 2. The Brook, Best St - We typically serve this section of route with up to 20 buses an hour in each direction. This is one of the main routes to and from Chatham town centre and the Waterfront bus station. Delays and disruption on this section of route is very common and the consequential delays to services can be observed at Rainham, Walderslade, Lords Wood, Gillingham, Medway Hospital and Hempstead Valley. The red route on this section will significantly be of benefit to bus passengers in Medway. 	Support noted.

Name / road	Objection / Feedback	Officer's responses
	<p>3. Rainham High St - We typically serve this section of route with up to 4 buses an hour in each direction. This bus route is the main one connecting Chatham to Hempstead Valley. Rainham High Street is a real bottleneck on the highways network. Delays and disruption on this section of route is very common. The red route on this section will significantly be of benefit to bus passengers in Medway.</p> <p>The impact of traffic congestion on buses is huge. It causes buses to operate slower and less reliably, meaning that as an operator we need to put additional resource into services to maintain service levels or reduce service levels to reflect the slower journey times. This affects both the costs of operation and also the revenue generated, both in a negative manner. In addition, longer journeys and less reliable journeys makes the bus less attractive to passengers who seek alternative journeys or modes of travel.</p> <p>In addition, the vitality of a bus network is driven by the economic strength and attractiveness of the destinations the network serves. Traffic congestion and gridlock makes areas less attractive destinations, driving down the latent demand for travel to these destinations, which in turn makes the bus services serving them less viable and sustainable.</p> <p>Medway, by its nature is an historic area which causes natural bottlenecks in the highways network, where more capacity is needed but is unable to be provided in the space available. Hence maximising the efficiency of the existing highways network is paramount to keeping Medway moving. It would never be countenanced that railways could be blocked by parked vehicles because it is clear that they would cease to function effectively, yet the blocking of roads is more widely accepted. The introduction of the red routes in the key targeted locations as proposed will allow the highways network to flow smoother and reduce congestion, and we full support this because our passengers will feel the full benefit of their buses being able to move through these pinch points a lot quicker and more reliably.</p> <p>If you require anything further from me, please don't hesitate to get in touch.</p> <p>Regards</p>	

Objection to the Traffic Regulation Order in support of the Rainham Red Route Proposal

The proposed Traffic Regulation Order (TRO) covering Rainham High Street (A2) is objected to for three central reasons:

1. **The formal consultation process has not been conducted according to the Statutory Process minimum timelines required, or the process published on Medway Council's website, and on-street notices.** The Gun Wharf offices were closed to the public according to an announcement on the 30th October 2023, one month prior to the issuance of the TRO consultation communications launch on 1st December 2023), and detailed consultation papers have not therefore been available for inspection there during "normal office hours", nor were they subsequently available at Community Hubs as was the case with initial consultation materials. This coupled with well-advertised nationwide postal delays, and, the decision not to make TRO consultation detail directly available via the Council website, have made accessing documents as cumbersome as possible, amplified by a potential five working day turn-around for requesting electronic copies of materials by email. In addition, two elected ward councillors, who are members of the Rainham Town Centre Forum, were deliberately excluded from design amendment consultation communications with Rainham businesses over proposed design changes to add additional loading bays. Finally, the detailed consultation documents available at Gun Wharf, and their electronic equivalent, contain errors and omissions and are inconsistent with other information published on the Council's website; this includes reference to another local authority, who it is clear the document template was borrowed from, and copyright infringement may have occurred. The level of due diligence undertaken prior to publication of this document, through the entire chain of command from the officers in the Highways Department to the Director of Place, Adam Bryan, whose name the document is in, has clearly been inadequate for Statutory Consultation.
2. **Filling a budget funding gap is not a valid statutory purpose for a Traffic Regulation Order.** Yet, it has been clear from earliest "Star Chamber" discussions on Red Routes in 2022, that this proposal was financially motivated; the lack of any analysis or quantification of anticipated congestion improvements, or wider claimed benefits, strengthens such a position. It is abundantly clear to all who live in Rainham, that other significant impediments to the free movement of traffic exist and without addressing those, improvement won't be noticed and the use of CCTV cameras becomes entirely disproportionate and goes against The Protection of Freedoms Act 2012. Medway Council members, from portfolio holders to the chair of the O&S Committee for Regeneration, Culture and Environment have failed to investigate challenges put before them concerning lack of due diligence by Council Officers, and instead chosen to brandish concerns raised as "scaremongering". Senior members of the Red Routes project team determined that they would not engage with experts across either Environmental Protection or Climate Change teams to validate wider claimed benefits, and subsequently failed to mention in presentations to Cabinet that all benefits should be caveated as "assumed". This combined with a clear lack of supporting evidence of any analysis having been done of the historic issuance of the Penalty Charge Notices (PCNs) across the length

of the proposed Red Route, either by location of offence or time of day, or review of their own data on recurrence of road closures and repairs, illustrate a lack of credibility that traffic congestion in Rainham is most significantly impacted by illegal parking or stopping. This has, I believe, misled Council Members, as without solid evidence of improved traffic flows (in the unique Rainham setting), instead relying on other local authority anecdotes results and contrived initial consultation results, the claimed statutory purpose of “free movement of traffic” is not proven or valid here;

3. **The TRO significantly risks damaging the prosperous cultural centre of Rainham and its pedestrian zone** (three pedestrian crossings within 400m and 5 in total), which currently support: a vibrant local economy of pubs and restaurants; access to the healthy living centre; access to a 13th century church (also a community hub); and a significant active travel corridor for safe passage of children on their way to and from school. Preventing brief stopping, e.g. to let someone out, at the Healthy Living Centre, or outside a restaurant, or quick delivery, which would currently be considered permitted, as there are no yellow check marks on the kerbside to indicate no stopping or loading / unloading at any time, would have a detrimental impact to this area and people’s lives. The addition of CCTV cameras also impacts upon personal freedoms of those living in properties facing on to the A2, as well as those going about their everyday business. Beyond this, the proposed additional lay-by outside the Nationwide will be a serious hazard to cyclists.

Under the 1984 act section 122(1) pedestrians are to be given equal consideration alongside vehicles in their expeditious, convenient and safe movement. This proposal has completely ignored pedestrian’s rights in Rainham, which are of a far greater consideration than the proposed TROs for Chatham or Rochester (where the high streets have had pedestrian priority for many years). These differences warrant a more sensitive and engaging consultation approach with residents and businesses, and not a one size fits all across all five Red Routes (four of which are closer to urban clearways). A Citizen’s Assembly is recommended to properly engage the community and identify alternative ways of reducing traffic volumes and increasing active travel.

Finally, passing the baton of local administration after twenty years of Conservative control, right at the time when detailed due diligence should have been being undertaken, has coincided with a significant projected budgetary shortfall. Officers who had not previously dealt with a change in administration were faced with ejecting long standing members from their offices, setting up new committee structures, and welcoming new members. All of this to contend with in parallel with the new Labour administration champing at the bit to deliver its first 100 days plan. Whilst this might not normally be a consideration in objecting to a TRO, it is clear that all three of the projects in the Safer, Healthier Streets Programme have dominant, rather than subordinate financial aims, and an urgency to deliver on them; this has seriously impacted the usually judicious assessment of projects committing £805,000 of public money. The potential risks to small local businesses has been well documented in an academic study by Aston University, but this portfolio holder has his ears closed, and Rainham will remember that at election time <https://www.business-live.co.uk/economic-development/red-route-devastating-trade-3964372>

[redacted], 21st December 2023

Proud resident of Rainham for over sixty years, father and grandfather, who married in St Margaret’s Church Rainham, member of the Rainham Eco-hub, and champion of cleaner air for Medway (and for the benefit of doubt, a member of the Medway Green Party).

What follows is an expansion of principle points made above and brings together: personal conversations I have had with Members (Cllr Simon Curry (Lab), Cllr Tristan Osbourne (Lab), Cllr Crozer (Ind) Cllr Mark Joy (Cons); Freedom of Information Requests and social media exchanges with the Medway Labour and Cooperative Party. I believe all are relevant to my objections and help place them in further context, and should be considered as part of my objection and not ancillary to it.

1. The formal consultation process has not been conducted according to the Statutory Process published process on Medway Council's website:

- a) According to the 2020 TRO briefing paper by Parliament, consultations are required to ensure that adequate publicity is provided to those likely to be affected and those who have objected are given the reasons for their decisions to proceed. It's therefore expected that detailed, accurate and consistent papers are published and are accessible to all that want to review them. This has clearly not been the case due to the widely advertised Gun Wharf building closure, known seasonal postal delays and inability to access consultation content directly from the Council's website, where for example access to planning applications are available to registered users, but the TRO consultation documentation was not. So, whilst twenty-one days may be the elapsed time for the consultation window (from 1st to 22nd December), practically it has been foreshortened by the operational conditions and impacted by inaccurate and incomplete detailed documentation being made available. **BRIEFING PAPER** Number CBP 6013, 11 June 2020 Traffic Regulation Orders (TROs): <https://researchbriefings.files.parliament.uk/documents/SN06013/SN06013.pdf>
- b) There has been no attempt to consult directly with residents whose properties face directly onto the proposed Red Route, despite there only being approximately 40, compared to the sixty businesses already supposedly consulted. The residents' privacy, basic freedoms and standard of living will be impacted by the proposed CCTV and obstructions to receiving deliveries, without alternative access points to the properties. Addressing this subsection of the community more directly with assurances as to how their privacy will be assured, and basic freedoms maintained is not only relevant and appropriate, but common decency; it cannot and should not be assumed that they all follow social media or the Council's website;
- c) Whilst it is acknowledged that there has been some consultation with businesses in the centre of Rainham, largely I believe to refute claims of predetermination, and resulting in three additional loading bays added to the design, consultation with businesses further down the High Street to the east, have led to no such capitulation. There is direct concern about inconsistent information being shared with businesses about precise locations of loading bays and times of operation (the informal maps illustrating locations on the Council website shows one of them over the top of a pedestrian crossing and the detail of the proposed addition outside the Nationwide Building Society is completely missing from the maps contained in the Statutory Consultation documents). These consultations with selective local businesses appear to have been focused on reducing formal objections to the scheme, directed via the Rainham Town Centre Forum to be responded to by the design team with only one business day notice, and lack any real concern for any specific business impacts;
- d) It is my contention that the now formal Statutory Consultation Stage should not be seen in isolation from the prior "initial consultation" stage (now described as an "optional" step in the TRO process), because it was not framed in that fashion in Medway Council flyers distributed to all Community Hubs in July 2023. To everybody who took part it was "formal" as there were no caveats included as to whether the Council could simply ignore them. Rainham residents are now furious and feel that they

- have been misled and ignored, negatively impacting their participation in this more formal Statutory Consultation stage. All serious concerns raised in the initial consultation stage were not adequately addressed (only a subset of business concerns around loading bays in the central area of the High Street were acknowledged) and the majority of resident concerns and suggestions were ignored on the basis of an arbitrary 1km geographic exclusion. More widely across Medway that means that whole communities and electoral wards that would be affected by the proposals, had their feedback excluded; this I contend was deliberate, predetermined and anti-democratic;
- e) The Rainham “initial consultation” rejection rate was the highest of the five Red Routes proposed in Medway. To only address the concerns of those who live 1km from the centre of the defined route when this is a main road for much of the town is unrepresentative. The UK government’s website (<https://www.gov.uk/government/get-involved/take-part/become-a-councillor>) describes council as led by democratically elected councillors who represent their local community (all ten elected Conservative councillors voted against the Rainham Red Route in keeping with their constituents views and “called-in” the proposal leading to a special hearing at Oversight and Scrutiny Committee for Regeneration, Culture and Environment on 18th October 2023); their views were ignored and merely rejected as hypocrisy, due to the Conservative Party originating the outline proposal as part of a package of measures prior to the May 2023 election;
- f) An offer by Assistant Director Ruth Du Lieu (on 16/10/23), after the Call-in hearing, for me to attend a meeting with herself and the Council’s team of experts to further discuss my concerns (“**prior to pressing to Statutory Consultation**”), was then delegated to more junior officers, none of whom took part in the failed Call-in hearing on 18/10/23. I shared my suggested agenda for the proposed meeting with the delegated chair (Michael Edwards) without any acknowledgement. Having further proposed that Cllr Crozer (Independent) attend the meeting, the meeting was cancelled and has subsequently not been rearranged as promised by Ruth Du Lieu;
- g) The Council (Highways Department) additionally sent out a paper survey in advance of the “initial consultation” on Red Routes, in Deputy Director of Place’s name (Ruth Du Lieu), on “Local Streets, Roads, Buses and Cycling” in June 2023, to an undisclosed audience (it was not sent to everyone in Rainham, or even the 1km radius bubbles) the results of which were, I believe, conflated with the results with the initial Red Route consultation, which is highly contrived. I emailed my concerns over that paper survey to Ruth Du Lieu on 23rd June 2023 (CC:ing Ian Gilmore and service specialist leads in Environmental Protection, Active Travel, Public Health and Public Transport) and didn’t get any acknowledgement of my concerns! Concerns were therefore raised again as a public question at Full Council on 20/07/23, and responded to by Cllr Curry who acknowledged the concerns who promised to do better in future; this Red Routes project illustrates that no such learning has occurred;
- h) Due to the many serious issues noted with the initial consultation process, it is very surprising that this project has still pushed ahead to Statutory Consultation. In messaging raised via the Medway Labour and Cooperative Party X feed (previously Twitter) they note that the Call-in and subsequent challenges have brought additional budget pressures due to delays in implementation, which go further to support that this is a primarily financially motivated project and a claim of predetermination is reasonable. The administration should also note through its heavy-handedness in ignoring initial consultation objections it has seriously damaged its democratic ability to engage on matters of even greater significance, such as climate change and the emerging local plan;

2. The lack of validity of the claimed Statutory Purpose:

- a) Penalty Charge Notice income, we now understand is based on a 7000% forecast increase in PCNs to be issued across Medway (252 PCNs over the last two years, versus a forecast 9,125 PCNs per year going forward), and the heightened concerns over implementation delays creating additional budget pressures, continue to be the consistent push backs on any objections made. This is the primary driver for this project and it is disingenuous of the Council’s Highways officers to recommend to Members a project which will fail to deliver on its stated aims of “keeping Medway moving by trying to reduce traffic congestion and making journey times more reliable”, whilst all the time really trying to fix a budget hole to continue to pay for its ongoing street repairs. At this level of projected revenue (and dependent upon the Council’s depreciation policies) this implementation will make a profit in year 2 (in contrast to Cllr Osbourne’s public comments), and all subsequent years, unless of course driver behaviour does change given the deterrent of fines, and the council is left with an expensive to run, red stripy elephant;
- b) Detailed analysis of historic PCN issuance based on data provided via FOI Inf001190 illustrate that over the past two years that there are less than ten outside areas that have no impact on congestion and none issued between 08-09 and 17-19 at the most congested times, and none east of Rainham Post Office. None of this appears to have been reviewed, instead relying on anecdotal responses from a manipulated initial consultation survey

Row Labels	Count of Hour
0	2
2	1
7	1
8	2
10	11
11	7
12	1
14	3
15	14
16	4
19	5
20	5
22	10
23	2
Grand Total	68

The table opposite illustrates the recorded hour of the day that PCNs were issued at. The peak frequency of issuance suggests existing patrols are not operating at the most congested times of day, or that illegal parking is not occurring then. Adjustments to patrols if only as a monitoring exercise could act either as a deterrent or prove illegal parking does not occur then, or impact upon congestion.

Assessment of the specific locations of PCN issuance further illustrate that only 1 was issued east of the Post Office, and again either patrols are not operating their, or illegal parking is not occurring, and planned “future proofing” by extending the Red Route further down High Street is unwarranted.

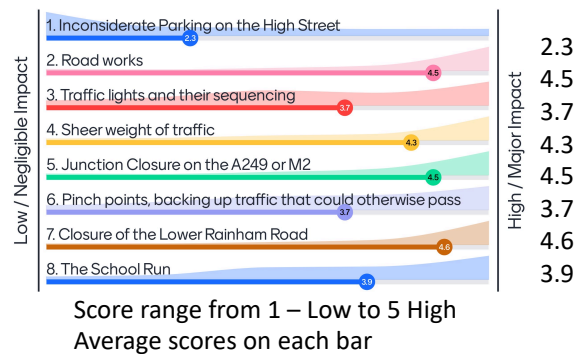
Table 1. PCNs by Hour of Day 2022/23

- c) As I presented to the O&S Committee hearing on 18th October 2023 (an independent survey of over 360 resident views on the factors most contributing to congestion in Rainham), there are many factors at play in the rising traffic on Rainham’s main road, which include but are not limited to the increasing population (and construction traffic which comes in advance), roads which are not designed to deal with the volume or weight, persistent roadworks not only in Rainham itself, but also closing the M2 Sittingbourne junction so more traffic is diverted via the A2. When Rainham residents have been asked what they put traffic issues down to, the most common answer is the

closure of Lower Rainham Road. This TRO will not change any of these influencing factors on traffic levels, particularly at peak times;

Mentimeter

Rainham residents views on impacts on congestion in Rainham High Street at peak times



9 365

- d) The risk assessment of the Red Route proposal only raised two BII level risks to Cabinet’s attention: 1. Delays in delivery of CCTV cameras and 2. Further objections raised at Statutory Consultation stage. No assessment of benefit delivery risks, or delays causing budget pressures, and most worryingly, no assessment of risks to local businesses or residents in relation to The Protection of Freedoms Act 2012 and Article 8 of the European Convention on Human Rights concerning the right to family and private life;
- e) Council Members, Portfolio Holders and Cabinet members might justly have assumed that the project team had followed the Council’s own internal policies of presenting all projects impacting on air quality to its Air Quality Steering Group. This approach is designed to ensure that expert advice is sought from the Council’s Environmental Protection Team, and or, external air quality specialists Ricardo, whereby all claimed benefits to air quality improvement would have been validated. Unfortunately, this was not the case and significant caveats weren’t included in presentations to Cabinet about such claims; nor to those associated with road traffic emissions of green-house gases, or public health improvements. A recommended phased approach and pilot scheme to validate benefits and impacts on traffic flow rates, which would reduce the risks was ignored;
- f) As per the 1984 act, the TRO must have **statutory purpose**, yet there is no evidence presented of the current levels of illegal parking, or currently legal stopping of vehicles on Rainham High Street and, moreover, no evidence as to how the proposed TRO would overcome traffic volumes on the High Street. The “evidence” used to support this TRO is at best anecdotal, and no attempt was made to contrast existing annual numbers of Penalty Charge Notices (PCNs), their location and time of day, with the anticipated number post Red Route implementation; this coupled with the impact of the deterrent effect is fundamental but has been ignored;
- g) Inadequate consultation goes beyond the “initial consultation” with residents and includes a lack of integrated working internally, and between departments with the

now contracted Red Route experts to the Safer Healthier Streets programme (Marston Holdings). Whilst the list of Statutory Purposes for a TRO includes free movement of traffic, it does so on the assumption that there are no other material impediments to that free movement (otherwise every busy A and B road would be a Red Route). This is clearly not the case with Rainham, where many congestion factors have been identified and will continue to impinge on free movement at peak times of day, not least the five sets of traffic lights (with pedestrian crossings). Proposals should also be proportionate and so called “future proofing” of the proposed Red Route beyond any rational stopping or parking points, and beyond the known pinch point at the bottom of Miers Court Road is over zealous and adds unnecessary further expense. Just as the Council has not modelled existing or future traffic flow (with or without the design alterations), it has not considered the opportunity to increase the focus of Traffic Management Officers to predictable and known offending areas at the busiest times of day. The Council is quite capable of delivering such refocus, as was proved by teams of wardens patrolling the public events in Rochester, specifically officers outside schools;

- h) Freedom of information requests raised on the 18/09/23 (Inf001190) concerning the historic penalty charge notice levels on the five routes, and the pre-assessment of likely improved traffic flows and air quality improvement were conveniently delayed to reduce the likelihood that these could be referenced at the Call-in hearing. These were eventually delivered on 17/10/23 one day before the O&S Regeneration Culture and Environment committee meeting, only after a highly charged phone conversation with Cllr Curry on Monday 16/10/23, leaving inadequate time to properly analyse information received before the hearing;
- i) An FOI (MFO1001392) concerning Marston Holdings involvement in the proposal explained that they had not been providing any guidance on the Red Route project of the Safer Healthier Street project, with the contract not being signed until 1st November 2023. This is concerning and confusing, as firstly, they attended the community meeting held in Rainham on 24/07/23 with Cllr Curry, promoting the benefits of Red Routes on air quality and secondly, they represented the Council at the O&S Regeneration, Culture and Environment committee Call-in meeting on the 18/10/23, where they were permitted to speak as part of the Council’s senior team on promoting the solution to improve air quality, without the substantiated evidence;
- j) The project proposals for the Red Routes and School Streets projects include air quality monitoring equipment, assumed to have been specified by Marston Holdings? Insufficient information has been provided as to why this equipment has been included, what it will be used for, or how it will be incorporated into the soon to be updated Air Quality Management Plan for Medway. Regular recalibration of such equipment will be required as there is no such thing as “fit and forget”;
- k) The Freedom of Information Act request (INF001190) clearly illustrates that there are very few penalty charge notices raised for illegal parking on the A2 (and even less on Route 3, Best Street, **three in the past two years**), and those instances were never at the busiest, most congested times of day. The times of day and locations of illegal parking and stopping are quite predictable, based on the data from the FOI and could readily be enforced by traffic by existing traffic management officers;
- l) The “assumed” benefits to traffic flow are purely that, “assumed” and the FOI INF001190 results clearly show that the Council has not sought to analyse existing flow rates or project any level of traffic flow improvement as a result of the Red Route deterrent measures. Without details of such improvements, it is impossible to analyse / model air quality improvements (via the government approved modelling tools) and consequently there is no assessment of improvement in the timeliness of public transport;

3. **Destroy the character of Rainham High Street:**

- a) To understand Rainham you have to get to grips with the character of its retail businesses, pubs, restaurants, motor dealerships, healthy living centre, post office, take-away food, hair dressers, funeral parlour. There are more businesses on the High Street than there are in Rainham Precinct, by some margin, whereas there are no retail businesses in Corporation Street, or in Best Street, or Star Hill, and just one or two at one end of the Brook;
- b) The length of the proposed Red Route also brings into its scope at least 40 residential properties, many with no rear access and potentially more residents who live there as the upper floors of shops are often dwellings;
- c) The length of the proposed Red Route is also a major corridor for parents taking Children to St Margaret's school and older students walking to the still growing Leigh Academy Rainham at the east end of Rainham, or west to the Howard School and Rainham Girls. Any Red Route here will remove any possibility of an extended cycle lane and inability to promote growth in active travel;
- d) Consultations with businesses fronting onto Rainham High Street have barely scratched the surface of the possible commercial impacts of the no stopping prohibition included, in the TRO and those I have spoken to beyond Rainham post office say they have largely been ignored. The occasional quick drop off of a customer, or regular fresh produce delivery will have a commercial impact at a time when every customer counts;
- e) The aesthetic of Rainham High Street, punctuated by a 13th Century church (with its beautiful horse chestnut trees, and flower baskets along the railings in all seasons) and now a vibrant community hub, risk being spoilt by red paint on its doorstep, multiple CCTV cameras and obtrusive signage. This is a church beside a war memorial which in recent years has been permitted to have the A2 closed for 30 minutes as part of the Remembrance Sunday service; subsequent to a Red Route designation it is doubtful whether this will be permitted in future. Due to the curves and undulations in the High Street, it will require at least five cameras down its length with accompanying road signage to confuse motorists further (no visuals of camera design, positioning or numbers have been provided as part of the detailed consultation, and the lack thereof fails to inform on a key aspect of this objection);
- f) Detailed route drawings, not readily accessible, do however show at least 27 additional lamppost mounted signs to add to the existing signage; the more frustrating as Cllr Hackwell had been unsuccessfully campaigning for years to get only two Air Quality Management Area signs erected to raise awareness to idling and air pollution in the Rainham AQMA. The Council are currently awaiting the formal (DEFRA funded) project report from the University of Kent's anti-idling project report, which should lead to actions which will actually reduce the measured air pollution in Rainham High Street.
- g) So, lacking any evidence to support achievement of its claimed aims, the Red Route proposal and this TRO, put all this at risk. It is by no means good enough and far from being a political ploy by the now opposition party, as claimed by portfolio holders.

- End of Objection -

Full objection - [redacted]

I object to the Statutory Consultation for the Red route planned for Rainham and would like my objections to be recorded with the points below. I believe the process that has been carried out to date has been flawed, amounts to a failure to properly consult and does not follow the Gunning principles. The sample copy of the brochure provided for the initial consultation does not even include details of the Rainham plans. A Red route on free flowing roads such as Luton Airport might work, on roads congested for other reasons it will not. It almost seems like the dates chosen for the consultation covering summer holidays and Christmas time are designed to limit the responses. These proposals affect people living in all of Rainham so should have been communicated to the whole ME8 postcode area not a 1km radius.

I regularly walk, cycle, run and drive along this route which gives a very good insight into the issues. Congestion will not be reduced by red routes when congestion is due to the volume of vehicles directed into a narrow pinch point on the A2 with 5 sets of traffic lights nor will it reduce idling and slow moving traffic for the same reasons. These signal controlled crossings indicate that this is a pedestrian zone and equal priority needs to be given to pedestrians and other road users not just vehicles.

TRO Purpose Invalid

According to law the TRO must have a valid purpose. The Red Route template appears to be copied from the one implemented in Luton - maybe due to Alex Constantinides also being the person who implemented that scheme too. However copying the benefits for the Luton scheme doesn't mean they are applicable to Rainham. The Rainham TRO even refers to Luton Borough Council not Medway. Red routes on an airport approach road are entirely logical, but not on a busy high street with congestion caused by other factors. There is no evidence to demonstrate that the Luton factors are relevant here and you only need to see the Luton Airport road to see the difference compared to Rainham. No queues, no traffic lights, no shops, no pedestrians, no junctions.



Current traffic congestion on the A2 in Rainham is due to the restricted road width limited by buildings and 5 sets of traffic lights not parked vehicles so a red route will have no impact on improving the flow of traffic through the town and is therefore a complete waste of money. There appears to be no cost/benefit analysis carried out for this scheme. This would appear to be contrary to the Statutory purpose of the scheme to keep traffic moving which has not been assessed. The

summary of the consultation states "Perception traffic congestion is caused by traffic volumes, roadworks, or traffic lights". **For local residents that know the area this is quite insulting.** This is local knowledge not perception and absolutely no evidence is provided in the documents to justify any alternative cause.

The Red Route proposal claims the following benefits.

- Reduce congestion, making journeys more reliable
- Prevent illegal and unsafe parking and driving
- Decrease idling and slow-moving traffic, a key contributor to poor air quality
- Reduce delays on essential services such as public transport and blue light services.

Yet there is no supporting documentation or evidence to back these claims up. It appears that the decision has already been made to implement despite the majority views of local residents opposing the scheme. With 5 sets of traffic lights there is no way that slow moving and idling traffic will be decreased. Again these benefits are copied from the Luton proposals but interestingly exclude improvements to cycling which really would be key to reducing congestion.

The Luton Red Route scheme started with a six month experimental TRO to assess benefits. If the council are adamant about proceeding then surely that would be the logical option for Medway unless the team already know that a trial would not be successful so can't take that risk.

Revenue Raising not Deterrence

In all the stated aims the benefits are from reducing congestion and delays yet the proposals anticipate a massive increase in PCN revenue which would imply that the benefit will not be achieved as vehicles will be in contravention and that actually revenue raising is the primary purpose of this scheme. This is backed up by the Star Chamber reports on the initial project proposal.

Ad Hoc Design Changes Made without Impact Assessment

Since the initial consultation various changes have been made (although not actually reflected on the supplied TRO documentation maps) to include loading bays in certain locations. These locations currently have double yellow lines and adding loading bays will reduce the road width thus reducing the traffic flow. If the road was considered narrow enough to need double yellow lines then it's not suitable for loading/parking bays. **In the 45-47 High Street location the creation of a loading bay will cover half the entire east bound carriageway according to the plans thus restricting traffic flow when used** These changes appear to have been made on an arbitrary basis without making any assessment of the impact on the flows of traffic or other road users but seem guaranteed to increase congestion not reduce it. This would be easy to test now by parking vehicles in this space to monitor problems caused by the width reduction.

Adding loading/parking in these locations will also force cyclists into the middle of the carriageway making active travel even less safe than it is at present and make crossing the road less safe for pedestrians with less visibility. This will have the opposite effect to the claimed benefits.

The A2 is a major route for emergency vehicles used many times daily. Alteration of the road layout requires consultation with those organisations to assess impact on response times. No evidence of Emergency services consultation has been provided along with the impact of reduced road width. No risk assessment for pedestrians/cyclists for new loading/parking bays outside 45/47 and 79/81 High Street have been given with reduced visibility adjacent to a pedestrian crossing.

Delays & Congestion not due to parked vehicles

If, as is claimed, delays are due to illegally parked vehicles, why are the worst locations for illegal parking being turned into legal parking & loading bays that will actually carve out a wider footprint from the main carriageway? By making these permanent loading/parking locations they will exacerbate the situation if it was the cause in the first place.

It seems clear that those promoting this scheme have not actually monitored the traffic along the A2 in Rainham to determine the cause of delays. You only need to stand and watch the traffic for a few minutes to realise that illegal parking isn't causing tailbacks, the primary cause of queuing traffic is the volume of traffic and the number of sets of traffic lights. (including in recent times temporary lights on A2 and those impacting feeder roads) The only time I have seen traffic buildup as a result of a vehicle parked up was due to a bus waiting to pick up passengers on the A2 outside the White Horse pub. This would not be changed by the red route as there is not sufficient width of road to have a parked bus and traffic able to pass by. (see attached photo) The real opportunity to fix that would have been during the construction of the Healthy Living Centre which could have been set further back to allow a bus stop in front. Sadly with the land for the Rainham bypass now released for development the requirement identified many years ago that the only solution was to bypass the A2 in town centre has been lost.

Loading/Parking Bays will Increase Congestion/Delay Public Transport & Emergency Vehicles

The planned loading/parking bay at 45/47 High Street is immediately adjacent to the bus stop so it will force buses to sharply turn into the opposite carriageway to navigate round the parked vehicles or those loading. When the Gillingham bound lane is stationary this will also prevent traffic travelling in the opposite direction until the bus can move. As this is also a new disabled parking location it is likely to be filled with cars at the busiest times preventing loading by local businesses which will also create difficulty when they cannot unload.

Outside Nationwide/Tarana is proposed to be a new loading bay despite not being included on the supplied maps. Given that the distance between the buildings is fixed the only way this can be achieved is by reducing the road width and removing the right turn lane to the Cricketers car park. As such this will create more congestion and delays not less as vehicles are not currently parked at that location due to the double yellow lines so through traffic can pass inside of any vehicles turning right. (see attached photos including showing how far bus needs to be in centre of road without loading bay)

Restricted Local Road Routes

I have lived in Rainham for nearly 50 years and with the increase in housing development it is no surprise that traffic is so bad. The need for a bypass was identified 60 years ago so it's not a new problem. There comes a certain tipping point where you can keep adding developments which individually may be small but eventually the increase is unsustainable when roads are limited capacity due to bottlenecks. There are very limited routes that go east-west (Lower Rainham Road and A2, M2) so all traffic will be funnelled into those roads. When 2 of those roads have width restrictions due to existing buildings that mean they cannot be wider (eg Pump Lane junction on Lower Rainham Road and A2 outside the church) then you will always have queues of traffic once the volume reaches a critical mass. Exactly the same situation is now being seen in Maidstone where it's not just local resident traffic but through traffic from other local areas that are stuck in queues. The attached map shows the funnel effect of traffic from north and south of the A2 being directed towards Rainham centre due to no other roads running east to west apart from the M2 which is currently impacted by roadworks at A249.

The number of PCNs issued has been used as a justification for the red route scheme. These are nothing of the sort. A penalty for overstaying parking in a legal space will not be impacted by the red route and not allow any additional throughput of traffic. Analysis of the data shows a minimal number of offences for breaking the double yellow line restrictions which could easily be enforced as now with manpower which should also be enforcing the double yellow lines in Station Road.

Camera Enforcement Not Detailed

Due to the layout of the road with trees and bends there will be a large number of cameras and signs required to cover the route which are inappropriate in such a historic urban setting with residential properties. No details are given of the number of cameras or their locations. As traffic is primarily static it seems unlikely that any ANPR system will be accurate and will need manual intervention which will increase the operating costs. The document claims "*Enforcement cameras are not surveillance cameras. They do not continuously record and only provide short clips into a secure review system when a contravention occurs*" yet this cannot be true. At busy times all traffic is stationary so will need constant recording and review to check if any vehicle is stopped especially when the document states it will need to zoom in to produce evidence. Without this level of detail any PCN can be challenged that they were stationary in traffic not stopped.

No reasons are given for not using the existing or increased number of traffic wardens to monitor this area. The PCNs certainly don't support any suggestion it is effectively patrolled at present.

As a resident on a rat run route that is used for avoiding the traffic on the A2 I have more interest than most in a scheme that will reduce traffic delays and minimise any incentive for drivers to try alternative routes as a short cut. Overall the Red Route for Rainham seems a poorly thought out scheme with minimal benefit that is guaranteed to not achieve the objective being proposed.

Incomplete Risk Register

The risks shown include only 2 items, neither of which relate to the implementation of the scheme. Councillors are making this decision totally blind if officers are not giving them the full risks of the project. If no risks have been identified on a near £1m project then this is a serious financial matter. I would expect this to have included items such as:

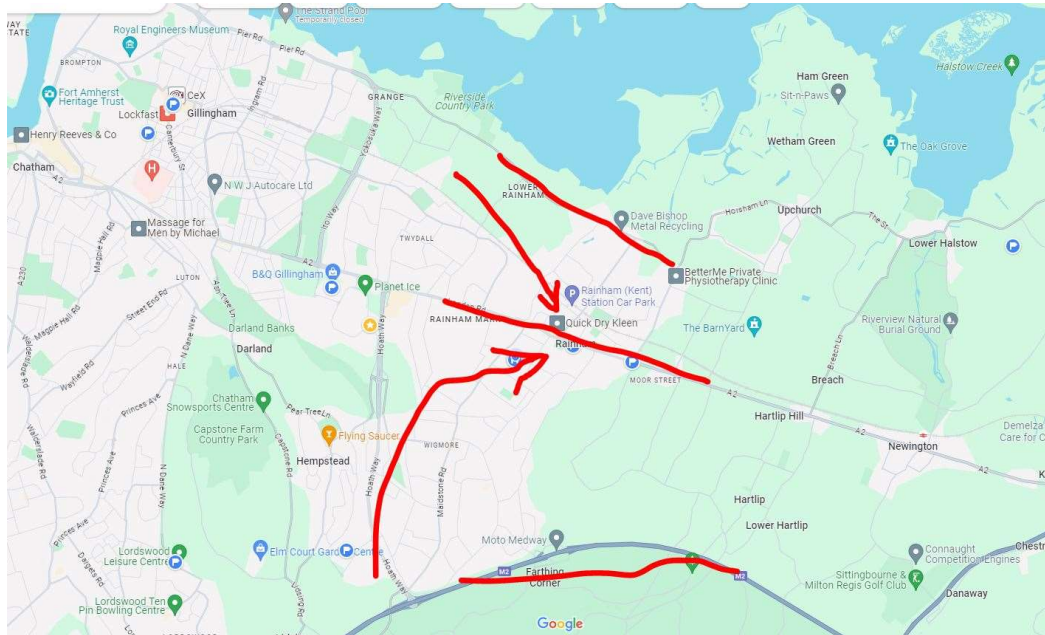
- Consideration of red route not being achievable in a congested urban area
- More cameras being required than expected (£26k each?) so cost escalates
- Scheme aims are not achieved and congestion remains or worsens
- Running costs exceed budgets with too many manual interventions
- Revenue falls short of predictions with higher compliance
- Loading/parking bays cause additional congestion

Why are these risks not being addressed? Local residents know the area better than a planner sitting in their remote office. It is quite telling that the objections to the Rainham proposal far outnumber any of the other red route plans and as such this should give a good indication that it will not achieve the statutory required aims. Rather than spending money on an exemptions team and red route infrastructure surely it would be better to enforce existing traffic regulations first for minimal cost if the true aim was to reduce illegal parking and congestion.

To propose a scheme costing nearly £1 million with no quantified benefit assessment seems extremely reckless especially when the council is claimed to be in financial difficulty.

I am happy to meet any of those involved in the design of the scheme on site to demonstrate the current issues and the lack of impact that a red route will have in improving this.

I attach a map showing the traffic flows into Rainham as well as 2 photos highlighting the restricted width of the road at present. This shows the unfair and unreasonable exclusion of resident views from more than 1km away from the High Street. Traffic from the whole area uses the A2, it's not restricted to immediate roads.



ePetition details

No Medway Red Routes

We the undersigned petition the council to Stop the proposed Traffic Regulation Orders associated with Red Route proposals for Chatham, Rainham and Rochester, which we believe will be ineffective at improving traffic congestion and lead to none of the stated benefits and irreparably damage the character of Medway. We ask instead that Medway Council establish a Citizen's assembly on Road Traffic and congestion and work with residents to identify alternative approaches to: improving traffic flow, air quality and increasing active travel.

Many factors have been identified that are significant in contributing to traffic congestion in our towns and details have presented to the Council members and officers, but ignored. CCTV cameras are supposed to be used in extremis and not as a default to all traffic related concerns. It is clear that if traffic management officers were better directed they could be effective, with the current regime of double yellow lines. Double red lines will be unsightly, and coupled with already overburdened signage and CCTV cameras, they will make our would be City unattractive to visitors.

This ePetition ran from 09/12/2023 to 21/12/2023 and has now finished.

206 people signed this ePetition.

Our ref:

Date: 11 January 2024



Mr [redacted]
[redacted]
Rainham Gillingham
Kent
ME8 XXX

Director's Office
Regeneration, Culture & Environment
Medway Council
Gun Wharf
Dock Road
Chatham
Kent. ME4 4TR
Email: adam.bryan@medway.gov.uk

Dear Mr

I refer to your email dated 8 January 2023 that followed my formal response to your petition. I have noted your comments and concerns.

The Statutory Consultation period has now ceased, and the responses are being analysed. I know that your petition was included within the statutory consultation and so all of your input during the period of consultation will be considered along with all other consultees and a decision will be published in due course. However, to provide you with additional clarity, I have provided some information below.

1. *"The exclusion of the proposed Nationwide loading bay from the TRO particulars, and the piecemeal communication of changes re MTO, means those consulted will not see the bigger picture. Your teams have not delivered the Statutory Consultation in accordance with their own published procedures or with the legal obligations of the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. My preference now would be to see the Statutory Consultation re-run, in accordance with the guidelines and or, a Public Enquiry to ensure that the correct details are presented, in locations accessible to everyone, and nothing is hidden in the small print."*

Response: Medway Council has fulfilled its obligations in respect of publishing its proposals and allowing for objections. Whilst there is no mechanism included for debate, we have answered your queries in full each time they are presented. Your objections have been recorded and considered, along with the many representations of others, which carry no more or less weight than yours. The proposed loading bay you refer to is included in both the public notice and traffic order (Para 3(b) and Schedule 3B respectively).

2. *"You note that all formal parking bays on the routes will be maintained, but the TRO document sets illustrate that this is not true. An example, the domestic parking bays outside the Amy Jane Aesthetics business in Chapel Row in Rainham has been lost,*

as the new double red lines have been extended at least 5m beyond the existing double yellow lines.”

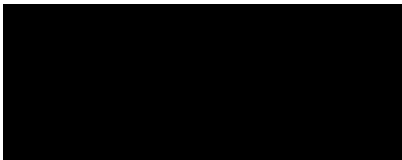
Response: There are no formal parking bays outside the Amy Jane Aesthetics business in Chapel Row, and your objection to the extended double red lines and subsequent reduction in parking capacity is noted.

3. *“Finally, and in context of the petition, what is clear that there is still a lot of missing detail in the proposals. Firstly, there has been no publication of the dispensation scheme that will operate for the red routes. The Luton Borough Council Red Route operates from 07:00-19:00 with single red lines, why are you proposing 24/7 double red lines? We have spoken to aged and vulnerable residents whose properties face onto the A2, and whose basic freedoms of home deliveries and carer visits are now at risk. All residents we visited signed our petition, directly, as all they had received was a flyer through their doors suggesting they review, what we now know are incorrect details, in closed offices.”*

Response: A dispensation scheme would not be part of the traffic order process, and arrangements can be made separately and adjusted without statutory TRO consultation. As explained previously, we are aware that the draft traffic order includes reference to Luton Borough Council in two Articles, which have no effect and will be removed if the order is subsequently finalised and ‘made’. As there are red routes successfully operating in other parts of the country it is unnecessary to draft an order from scratch and we do engage with other authorities to ensure a comprehensive approach. Unfortunately, a single red line operating between 07:00-19:00 would not be possible as there are existing double yellow lines in place due to the network configuration. Therefore, the double yellow lines are proposed to be replaced with double red lines, as a part-time restriction would be detrimental to the operation of the network. Due to the high volumes of traffic involved, it is common in such areas for double yellow lines to be present.

I trust this information is helpful.

Yours sincerely



Adam Bryan
Director of Place