

## 1 INTRODUCTION

1.1.1 Prime Transport Planning (Prime) prepared a Transport Assessment (TA) and Travel Plan (TP), both dated September 2019, on behalf of Dean Lewis Estates Ltd in support of their hybrid application on land off Old Ashford Road, Lenham, comprising of an (amended description):

*(i) Outline application (all matters reserved except for access) for up to 100 dwellings with incidental open space, equipped play area, sports pavilion and related car park (with various off site Highways works) with or without associated wetland scheme for nutrient reduction (ii) Full application for change of use of agricultural land for public sports and recreation including at least 1 Senior Football Pitch.*

1.1.2 Both documents were prepared following pre-application scoping discussions with Kent County Council (KCC), the local highway authority.

1.1.3 Following submission, KCC provided a consultation response dated 31<sup>st</sup> December 2019, raising a holding objection until a number of key issues had been addressed. Maidstone Borough Council (MBC), the local planning authority, also raised issues related to the access dimensions and requested the development be brought closer to Old Ashford Road.

1.1.4 The above matters were largely addressed in Technical Note 1 (TN1) prepared by Prime in January 2020. The key points addressed in TN1 included the access strategy, speed limit extension, footway connection, bus stops, swept paths and traffic survey dates. Additional correspondence with KCC and MBC continued regarding the proposed access arrangement and off-site highways contributions, with these matters agreed in 2020 and 2021 respectively.

1.1.5 Given the passage of time, during which on-site constraints have been addressed meaning that the application is now ready to be heard at MBC's Planning Committee, MBC raised several points related to highways and transportation matters for update and clarification. These were subsequently addressed in Technical Note 2 (TN2) prepared by Prime in April 2025. The key points addressed in TN2 included the revised access arrangement, bus stops, street lighting and cycleway infrastructure.

1.1.6 It is understood that MBC have now raised further queries relating to a range of issues, some of which are Highways related. This Technical Note 3 (TN3) therefore aims to address these comments and intends to provide, where possible, the information and clarification on the Highways points raised by MBC.

## 2 RESPONSE TO MBC COMMENTS

2.1.1 MBC's comments are provided in *blue italics* below, with a response in black standard font.

### 2.2 Emergency Access

*The parameter plan rev N shows 30m width of undeveloped area and the retained hedgerow of ecological value on the SW boundary and an emergency access in the NW corner. These are not compatible with the illustrative masterplan rev H which is why I have not accepted it.*

2.2.1 The Parameters Plan and Illustrative Masterplan have been updated by FPCR to align with the proposed emergency access shown in Prime Drawing P19013-001K which is agreed with KCC.

### 2.3 Sustainable Connectivity

*For sustainable connectivity to the village beyond the red line boundary, you need to demonstrate that adequate footpath widths can be accommodated in s278 works. Suggest the current guidance from Active Travel England be used as the objective.*

2.3.1 As agreed with KCC, it is proposed that a shared cycleway will be provided within the site adjacent to Old Ashford Road. Outside the extent of land within the applicant's control, it is not be feasible for the applicant to widen the existing footway along Old Ashford Road due to the existing highway width, lack of adopted highway verge in many places, and privately owned features which run along third-party boundaries such as walls, hedges and trees, preventing any widening to take place.

2.3.2 The TA submitted as part of the supporting documentation for the full and outline planning application for the erection of 48 dwellings and 102 dwellings respectively by Abbey Homes (ref: 17/500357/HYBRID) includes comments provided by KCC stating that the site north of Old Ashford Road:

*'enjoys good access to the A20 via Old Ashford Road, which has a good crash record and a continuous footway link to Lenham village centre on its southern side.'*

2.3.3 The comments go on to say that:

*'All of the village services within Lenham are within walking and/or cycling distance of the site, including the railway station, which is served by hourly train services to Ashford, Bearsted, Maidstone, Bromley and London Victoria on weekdays.'*

2.3.4 This application site is located on the southern side of Old Ashford Road and therefore benefits from the continuous footway which has already been highlighted as being acceptable by KCC as per the

- above. It is also worth noting that KCC have raised no concerns regarding the existing footway width during the application process for MBC/19/504724/HYBRID.
- 2.3.5 Nevertheless, a review using the information available, has been undertaken of the route into the village centre, this being based on OS mapping covering Old Ashford Road up to Tanyard Lane, and an adopted highways search which extends up to Groom Way.
- 2.3.6 Footway widths for the length of Old Ashford Road mentioned above are shown in Drawing P19013-005 in Appendix I. The section of footway between the site frontage and Tanyard Lane generally measures between 1.5m – 1.9m, with 1.5m regarded as the minimum acceptable width under most circumstances according to the Department for Transport (DfT) document *Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (2022)*.
- 2.3.7 Whilst it is recognised that the section west of the site frontage, adjacent the neighbouring cottages falls slightly short of this at approximately 1.3m according to OS mapping, and has a grass verge at the back of footway which could potentially allow for some widening, the delivery of a wider footway could impact the visual setting and amenity space of the cottage frontages. There is also a step down to the cottages which would make the delivery of consistent footway widening for the full length difficult.
- 2.3.8 Following Tanyard Lane, the footway is well established when heading into Lenham, comprising a reasonable width and quality. Whilst not included within this report due to licensing agreements, Land Registry and Google Imagery would suggest that the footway between Tanyard Lane and the village centre measure approximately 1.5m – 1.8m in accordance with the minimum acceptable width. Whilst it is recognised the footway narrows again adjacent St Mary's Church in the village centre, there is no scope for widening or improvements given the stone wall adjacent the church.
- 2.3.9 The information provided, including the appended drawing, demonstrates the existing footway is of a reasonable width and quality, and no further improvements than what has already been proposed by the applicant should be required.
- 2.3.10 The public right of way connection within the site will also provide an alternative route to the centre of Lenham, though it is accepted that this will not necessarily be usable in inclement weather.
- 2.3.11 It is also important to note that the applicant has agreed to provide around 200m of new footway running from the north-east corner of the site to Northdown Close along the A20 Ashford Road, as shown in Drawing P19013-300, along with circa 450m of new shared cycleway along Old Ashford Road from the junction with the A20 to the north-west corner of the site as shown on Drawing P19013-001K. Both of these improvements illustrated in the drawings are agreed with KCC.

*Confirm lighting and bus stops can be accommodated.*

- 2.3.12 As mentioned in TN2, a suitable street lighting strategy will be subject to a reserved matters application and detailed design.
- 2.3.13 The footway/ verge widths presented above would suggest that there will be opportunities to provide lighting columns at appropriate locations. ‘*Inclusive Mobility*’ states that the absolute minimum width of a footway can be 1.0m where there is an obstacle such as lighting columns. The general 1.5m – 1.9m therefore suggests there will be ample room to accommodate lighting columns where required. This is also the case for any lighting columns which will be required along the site frontage, given the land will either be within the extent of adopted highway or land within the applicant’s control.
- 2.3.14 With regards to the proposed bus stops, as demonstrated by Drawing P19013-005 provided in Appendix I, there appears to be a number of locations on both southern side of Old Ashford Road which could accommodate a cantilever style bus stop. There will also be many suitable locations along the northern side of the road given the new footway and verge provision provided by the Abbey Homes scheme. As mentioned previously, the positions and style of bus stops are indicative only, and are subject to further discussions with KCC and detailed design as part of any reserved matters application(s).
- 2.3.15 The applicant remains committed to providing a new pair of bus stops on Old Ashford Road and is willing to accept a suitably worded condition or make a suitable s106 contribution.

*Demonstrate scope for a controlled crossing (e.g. puffin or zebra) to allow for safe sustainable travel between the village and the sports areas on adopted lit footways. However, accept that residential impact of flashing lights and zig zags may need to be factored into the chosen location. The new uncontrolled crossing from Abbey Developments is opposite 1 Tanyard Cottages.*

- 2.3.16 It is widely accepted that controlled crossings should only be implemented in situations where traffic flow and pedestrian volumes are moderate to high, depending on the form of crossing. Active Travel England provide a useful Crossing Selector Tool, which whilst is currently only applicable for ‘interzonal crossings’ and not standalone crossings, suggests a controlled crossing is more appropriate over a threshold of 8,000 vehicles per day (vpd). This threshold could therefore be used as proxy when considering the implementation of a controlled pedestrian crossing.
- 2.3.17 The automatic traffic count (ATC) survey undertaken in 2019 as part of the original application recorded traffic flows along Old Ashford Road in both directions. The summary of the traffic flows during the typical peak hours and 5-day 24-hour average is provided in Table 2.1 below.

**Table 2.1: Old Ashford Road Traffic Flows**

Direction	AM Peak (0800-0900)	PM Peak (1700-1800)	5 Day 24 Hr Average Flow
	Flow	Flow	Flow
Eastbound	114	124	1240
Westbound	122	93	1214
<b>Two-Way</b>	<b>236</b>	<b>217</b>	<b>2454</b>

- 2.3.18 The DfT provide traffic counts for a point on Maidstone Road (Site number: 810029), west of the site and Old Ashford Road. Whilst it is recognised this is a different road, using the counts to compare flows in 2019 compared to 2023 (the latest year available), helps to provide a suitable uplift in traffic flows for the general area which can be applied to recorded 2019 flows. Table 2.2 below shows the DfT counts from 2019 and 2023 on Maidstone Road.

**Table 2.2: Site number: 810029 Traffic Counts**

Year	Count method	All motor vehicles
2023	Manual count	1816
2019	Manual count	1506

- 2.3.19 The percentage difference between the traffic counts in 2019 and 2023 is approximately 21%. Even if we were to increase the recorded 2019 two-way flows by a 30% uplift, this would equate to 3,190 two-way flows along Old Ashford Road. It is therefore reasonable to suggest that overall flows along Old Ashford Road with the proposed development and the Abbey Road scheme in place, is likely to be nowhere near the 8,000 vpd ATE threshold, and therefore a controlled crossing is not warranted.
- 2.3.20 Furthermore, it is generally recognised that the inclusion of a controlled crossing where there are low pedestrian flows, and therefore the crossing is unlikely to be used regularly or the signals called, can cause a highway safety risk. The original TA suggested pedestrian flows were likely to be in the region of 13 person trips in the AM peak and 16 in the PM. Even if these figures were doubled, Prime would argue that they would not be considered high and therefore a controlled crossing is again not warranted.
- 2.3.21 The 30mph speed limit extension coupled with the traffic calming proposed at the junction with the A20 shown in Drawing P19013-003E, both of which are to be funded by the applicant, will help to reduce speeds along Old Ashford Road, which will make it easier and safer to cross the road. It should also be acknowledged that the relatively straight alignment along Old Ashford Road offers an excellent level of pedestrian and vehicle intervisibility, again, making it relatively easy to cross the road safely.
- 2.3.22 The existing uncontrolled crossing is adjacent to 1 Tanyard Cottages and, as mentioned by MBC, flashing lights associated with a controlled crossing in the proposed location is likely to impact local

residents. It would also not be appropriate for the zig-zag road markings associated with a controlled crossing to be located across driveways.

- 2.3.23 Given the evidence provided above, it is considered that a controlled crossing over Old Ashford Road is unnecessary.

## 2.4 Speed Limit Reduction

*Confirmation that the whole of the Old Ashford Road will reduce to 30mph and that the arrangements attached are adequate measures to slow the traffic from the A20.*

- 2.4.1 The applicant has already proposed they are willing to provide funding for a traffic regulation order (TRO) and associated gateway features to extend the 30mph speed limit on Old Ashford Road further north-east to help reduce local speeds and provide a safety benefit to all road users, including pedestrians crossing the road as mentioned above. The exact position of the 30mph speed limit change will however be subject to further discussions with KCC, detailed design and the TRO process.
- 2.4.2 The proposed rumble strips, 'SLOW' road markings and cycle infrastructure proposed at the Old Ashford Road/ A20 junction approach, illustrated in Drawing P19013-003E, as well as the built-up form provided by the proposed development and the new Abbey Homes scheme on the northern side of Old Ashford Road, will also aid in reducing speeds. Prime and the applicant therefore believe sufficient infrastructure has been offered to aid in reducing the speed limit to 30mph.

## 3 SUMMARY AND CONCLUSION

### 3.1 Summary

- 3.1.1 This TN3 has responded to queries raised by MBC. The queries relate to the emergency access, sustainable connectivity and the speed limit extension/ reduction.
- 3.1.2 Multiple off-site highway improvements have been offered by the applicant and agreed with KCC in its role as local highway authority. These improvements conform with the three planning obligation tests in NPPF paragraph 58 and will also offer benefit to existing road users in the local area.
- 3.1.3 No further improvements are deemed necessary, nor has KCC requested any additional improvements.

### 3.2 Conclusion

- 3.2.1 To reiterate the conclusion of the TA and subsequent Technical Notes, the proposed development would not result in an '*unacceptable impact on highway safety*' nor have a '*severe*' impact on the operation of the highway network in terms of capacity.

- 3.2.2 As the proposal complies with local and national planning policy and guidance with respect to sustainable accessibility, safety and impact on the highway network, there are no highways or transportation related reasons why planning permission should not be granted.

## APPENDIX I

### TECHNICAL DRAWING