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## 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 comprising of Outline application (all matters reserved except for access) for up to 100 dwellings with associated works and infrastructure and Full application for change of use of land for public sport, play and recreation, on land located to the south of Old Ashford Road, Lenham, Kent.
- 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, as follows:
- rationalisation of the site access proposals to achieve an arrangement that is commensurate with the scale of development proposed and minimises the potential for conflict with existing access junctions on Old Ashford Road;
  - submission of vehicle tracking to demonstrate that the access junction layouts will suitably accommodate the manoeuvres of the largest vehicles that could use them;
  - submission of proposals in relation to the proposed 30mph speed limit extension and gateway features on Old Ashford Road;
  - submission of proposals to achieve footway connectivity to Ashmill Business Park and Northdown Close;
  - submission of proposals in relation to the proposed bus stops on Old Ashford Road, including associated footway arrangements;
  - confirmation on the dates the traffic surveys were undertaken; and
  - submission of vehicle tracking to demonstrate that the proposed modification to the eastern A20 Ashford Road/Old Ashford Road junction can accommodate the manoeuvres of the largest vehicles expected to use the junction.
- 1.1.4 Maidstone Borough Council (MBC) also raised issues related to the dimensions of the eastern access and requested the development be brought closer to Old Ashford Road.

1.1.5 The above matters have been grouped into the following sections of this Technical Note 1 (TN1):

- Access strategy;
- Speed limit extension;
- Footway connection;
- Bus stops;
- A20 Ashford Road/Old Ashford Road mitigation swept paths; and
- Traffic survey dates.

## 2 ACCESS STRATEGY

2.1.1 KCC asked for the proposed access arrangement to be rationalised to ensure that it is commensurate to the scale of the development.

2.1.2 The access strategy submitted in the TA provided two all-purpose vehicular accesses, though the western one was primarily to serve the proposed sports facilities with the eastern one primarily to serve the residential element. It will likely be the preference of the eventual housebuilder to segregate the sports facility traffic from the residential traffic. We have therefore maintained two accesses, however the western access will be solely for sports facility traffic while the eastern one will be solely for residential traffic; there will be no internal vehicular connection between the two accesses other than the potential for an emergency access which can also serve as a convenient pedestrian and cycle access. This revised access strategy is illustrated in Drawing P19013-001H included in Appendix I of this TN1.

2.1.3 KCC were informed during pre-application discussions that there are parcels of land to the south of the site that could become allocated for residential development in the future. As the applicant was keen to not compromise the potential future delivery of these parcels, the eastern access was designed to local distributor road standards with a 6.75m wide carriageway, which would allow greater than 300 dwellings to be served. However, the applicant has undertaken further indicative masterplanning work which suggests that should these parcels come forward for residential development, the cumulative total with the proposed development will likely be no more than 300 dwellings, therefore the applicant is content for the eastern (residential) access to be reduced to 5.5m in width which is suitable to serve that number based on KCC's standards.

2.1.4 The residential access has been moved very slightly further west to better suit the masterplan. The sports facility access has been relocated slightly further east to introduce a stagger between it and the car wash access opposite. The sports facility access cannot be moved further west unless KCC are willing to accept a shorter visibility splay. The staggered layout should be appropriate given the relatively lightly trafficked nature of the sports facility and the car wash.

- 2.1.5 In the interest of providing an access commensurate to the nature of the sports facility and the settlement, the western (sports facility) access has also been reduced in width where possible to enable a large car and a mini-bus to pass each other, resulting in the 5.5m width at the junction with Old Ashford Road and on the bends but reduced to circa 4.8m on the straight sections. Drawing P19013-001H illustrates these dimensions whilst the swept path is illustrated in Drawing P19013-205 (Appendix I). The provision of a single shared cycleway on the western side of the sports facility access will be sufficient and help to ensure that the access is not overengineered and commensurate to the local area.
- 2.1.6 It is important to note that the sports facility will primarily be used by local people. It will be a rare occurrence for any vehicle larger than a mini-bus to access the site as any football matches are likely to be amateur with visiting teams also being local and typically making their own way there or liftsharing, however, to enable a coach to access the site without disruption to traffic on Old Ashford Road, 10m radii are proposed at the junction with corner tapers also provided. A swept path illustrating the path of a coach is shown in Drawing P19013-202C (Appendix I). Should a coach ever access the sports facility, oncoming traffic on the access may need to give-way but informal traffic management could be used with the body inviting the coach visitors being responsible for it. Drawing P19013-201C (Appendix I) illustrates the swept path of a refuse collection vehicle at the sports access.
- 2.1.7 Such corner tapers have also been provided at the residential access to better accommodate the swept path of refuse collection vehicles as shown in Drawing P19013-200C (Appendix I), an issue raised by KCC. There is no expectation for coaches to access the residential element of the development now that separate accesses are proposed.

### 3 SPEED LIMIT EXTENSION

- 3.1.1 The use of site specific speeds to derive the visibility splays at the accesses which are achievable within public highway negates any need for a speed limit reduction on Old Ashford Road and the development of the site should naturally encourage slower speeds. However the applicant remains willing to fund a traffic regulation order (TRO) to extend the 30mph speed limit to improve residential amenity and highway safety.
- 3.1.2 KCC have requested the applicant demonstrate how the 30mph speed limit can be self-enforcing. Such enforcement is the responsibility of the local highway authority however we have proposed traffic calming on the westbound approach from Ashford Road and would be willing to consider providing a traffic calming scheme. Such a scheme could consist of a combination of horizontal and vertical deflection, gateway features, verge treatments, additional signage etc. Prime are willing to work with KCC to devise a suitable traffic calming scheme based on the authority's preference of such measures should it be required at this stage of the application, however we feel that it may be more appropriately addressed at the reserved matters or detailed design stage, as such, the applicant will

be willing to accept an appropriately worded condition or enter into a s106 Agreement to provide a traffic calming scheme in the vicinity of the site frontage.

## 4 FOOTWAY CONNECTION

4.1.1 The proposed shared cycleway running through the site along Old Ashford Road has been moved further north, closer to the hedgerow, at the request of MBC. This movement of the built form closer to Old Ashford Road will assist with the enforcement of the proposed reduced speed limit mentioned above.

4.1.2 Whilst the footpath will be set-back behind the hedgerow, it will be offered for adoption to KCC as it will be used by existing local residents as well as residents of the site.

4.1.3 KCC have requested provision of a footway connection to Ashmill Business Park and Northdown Close via s278 Agreement. KCC note that the footpath is identified in the Lenham Neighbourhood Plan, however the plan does not specifically state that it should be associated with the development site.

4.1.4 We firmly believe that provision of the footway connection to Ashmill Business Park and Northdown Close does not meet the three CIL tests outlined in paragraph 56 of the NPPF as follows:

*‘Planning obligations must only be sought where they meet all of the following tests*

*a) necessary to make the development acceptable in planning terms;*

*b) directly related to the development; and*

*c) fairly and reasonably related in scale and kind to the development.’*

4.1.5 In response to points a) and b), there is no guarantee that future residents of the site will work in the aforementioned employment areas, particularly given that they are fairly small scale so the demand for walking trips between them and the site may well be non-existent. With regards to point c) the applicant is already providing considerable highway improvements to the local area, including the shared cycleway on the southern side of Old Ashford Road, a new pair of bus stops in the vicinity of the site, speed limit reduction, improvement to the A20 Ashford Road/Old Ashford Road junction and enhanced public right of way connections. This additional request would not be fair and reasonably related in scale and kind to the development. These two employment areas have been constructed without footway connections and it is not the responsibility of the developer to address this existing shortfall.

4.1.6 The applicant may however be willing to contribute to the delivery of this footway connection via CIL or a commensurate amount in conjunction with other local development sites via s106.

## 5 BUS STOPS

- 5.1.1 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. The location of such bus stops will involve consultation with KCC Highways, KCC's Public Transport Team and bus operators. Our opinion is that the bus stops are best located to the west of the site for several reasons. Firstly, there is very limited highway verge on the northern side of Old Ashford Road meaning that the provision of hard standing for the eastbound stop would require a fairly substantial carriageway realignment.
- 5.1.2 There is however approximately 2m of highway verge outside of the properties between the car wash and consented application site 17/500357/HYBRID. Locating the eastbound stop in this location enhances bus accessibility for the consented development as well as existing properties in the vicinity whilst ensuring that all, if not the vast majority of properties proposed on the development site, will be within the recommended 400m walk distance to bus stops. The stops would need to be located to the west of the bend to maximise visibility.
- 5.1.3 Drawing P19013-004 (Appendix I) presents indicative bus stop locations, with the key aspect being the location of the uncontrolled crossing point. The location of the crossing shown allows a 90m vehicle-pedestrian intervisibility splay to be achieved, this being appropriate for a 30mph design speed in accordance with DMRB. Realistically, shorter Manual for Streets based splay distances should be acceptable with the speed limit reduction and potential traffic calming in place. Locating the bus stops in this location also ensures they are a convenient distance to the sports facility which is likely to attract a number of bus passengers, particularly those of a young demographic who may not have access to a car (i.e. teenagers).
- 5.1.4 We are happy to discuss options for the bus stop locations with KCC, but realistically this can be best addressed at the reserved matters or detailed design stage. It is expected that the new bus stops will consist of raised boarding areas, timetable information and potentially slimline/cantilevered shelters. As mentioned above, the applicant is willing to accept a suitably worded condition or enter into a s106 agreement to deliver a new pair of bus stops.

## 6 SURVEY DATES

- 6.1.1 The turning counts and queue length surveys referenced in the TA were undertaken on Thursday 27<sup>th</sup> June 2019, a neutral day by definition of DMRB, Guidance on Transport Assessment, PPG and WebTAG.

## 7 A20 ASHFORD ROAD/OLD ASHFORD ROAD MITIGATION SWEEP PATHS

- 7.1.1 The mitigation design for the A20 Ashford Road/Old Ashford Road has been slightly modified to better accommodate the swept paths of large vehicles, specifically a refuse collection vehicle and a 16.5m articulated lorry. The revised mitigation scheme is shown in Drawing P19013-003E with the updated bus swept path shown in Drawing P19013-203A and the articulated lorry and refuse collection vehicle swept path shown in Drawing P19013-204 (all drawings in Appendix I).
- 7.1.2 The swept path analysis demonstrated that the revised design better accommodates vehicles larger than a bus.

## 8 OTHER POINTS

- 8.1.1 KCC have raised a few other, more minor points in their consultation response.
- 8.1.2 KCC state that the trip generation for the sports facility does not include staff. This is not the case as the TRICS basis of the rates will include all arrivals and departures at the sites in the sample. Arguably the proposed facility would not have the same level of staff as the commercial 5-a-side sites in the sample, so the doubling of the rates should be considered to be robust.
- 8.1.3 KCC express concern that traffic associated with the other Lenham Neighbourhood Plan sites has not been included in the assessment of M20 junction 8 and the A20. The forecast flows from these sites have been included and are illustrated in Traffic Flow Diagrams 34 and 35 in Appendix C of the TA, and the subsequent Traffic Flow Diagrams 40, 41, 42 and 43. They are then included as part of both flow scenarios in Table 6.28 of the TA. Whilst we do not directly quantify the impact of these sites in isolation, we do consider the development site's impact on top of this and the flow information is available to feed into any strategic assessment work KCC may be undertaking on this section of the network. It is not the applicant's responsibility to consider significant mitigation on this strategic part of the network that will be subject to traffic growth from allocated development. Managing such cumulative impact is the responsibility of both authorities as part of the Local Plan.

## 9 SUMMARY AND CONCLUSION

- 9.1.1 The proposed access arrangement has been revised to address KCC's consultation comments as well as several issues raised by MDC. The proposed changes are illustrated in Drawing P19013-001H (Appendix I) and are summarised as follows:
- A single dedicated access will serve the residential element with a separate dedicated access serving the sports facility; no internal vehicular connection is proposed;
  - Indicative emergency/pedestrian/cycle connection shown between two accesses;

- Residential access moved slightly further west to better suit masterplan;
- Sports facility access moved slightly further east to introduce stagger with car wash access;
- Residential access carriageway reduced in width to 5.5m;
- Sports facility access reduced to suit swept path of mini-bus and opposing large car;
- Corner tapers added at junction bell-mouths to better accommodate large vehicle swept paths; and
- Shared cycleway on southern side of Old Ashford Road moved further north, closer to hedgerow.

9.1.2 Whilst it has been demonstrated that no speed limit reduction is required to facilitate safe access to the site, the applicant remains committed to funding the TRO process to allow the existing 30mph speed limit west of the site to be extended up to A20 Ashford Road. The applicant is willing to fund a traffic calming scheme via s278 or s106. Such a scheme can be better considered at the reserved matters and/or detailed design stage.

9.1.3 KCC's request for the provision of a footway connection to Ashmill Business Park and Northdown Close does not meet the three CIL tests and it should not be the sole responsibility of this development site to provide this. Should KCC insist on such a provision, the applicant may be willing to provide funding via CIL or a commensurate level of funding via s106.

9.1.4 We have suggested indicative locations for a new pair of bus stops which will be subject to further discussions with KCC. The precise location can be determined at the reserved matters and/or detailed design stage, however the applicant is willing to accept a suitably worded condition for their provision or provide funding via s106.

9.1.5 The traffic survey dates have now been provided to KCC. They were undertaken on a neutral day and were representative of typical traffic conditions.

9.1.6 The mitigation scheme at the A20 Ashford Road/Old Ashford Road junction has been slightly modified to better accommodate large vehicles.

9.1.7 We trust the revised proposals are acceptable to KCC and MBC. To reiterate the conclusion of the TA, 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. KCC have deemed the impact to be acceptable.

9.1.8 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.

9.1.9 We are happy to consult further with KCC should they have any concerns.

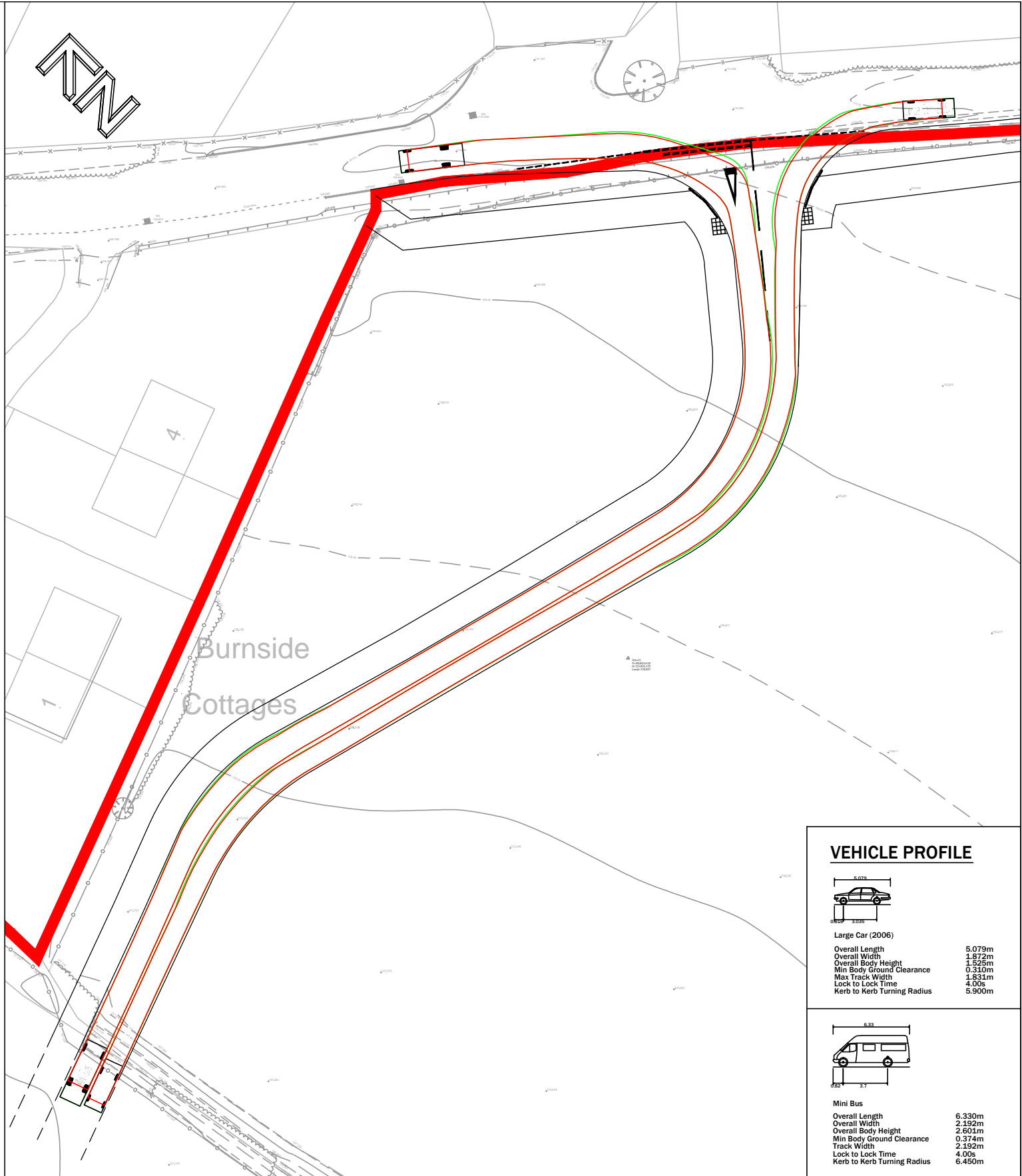
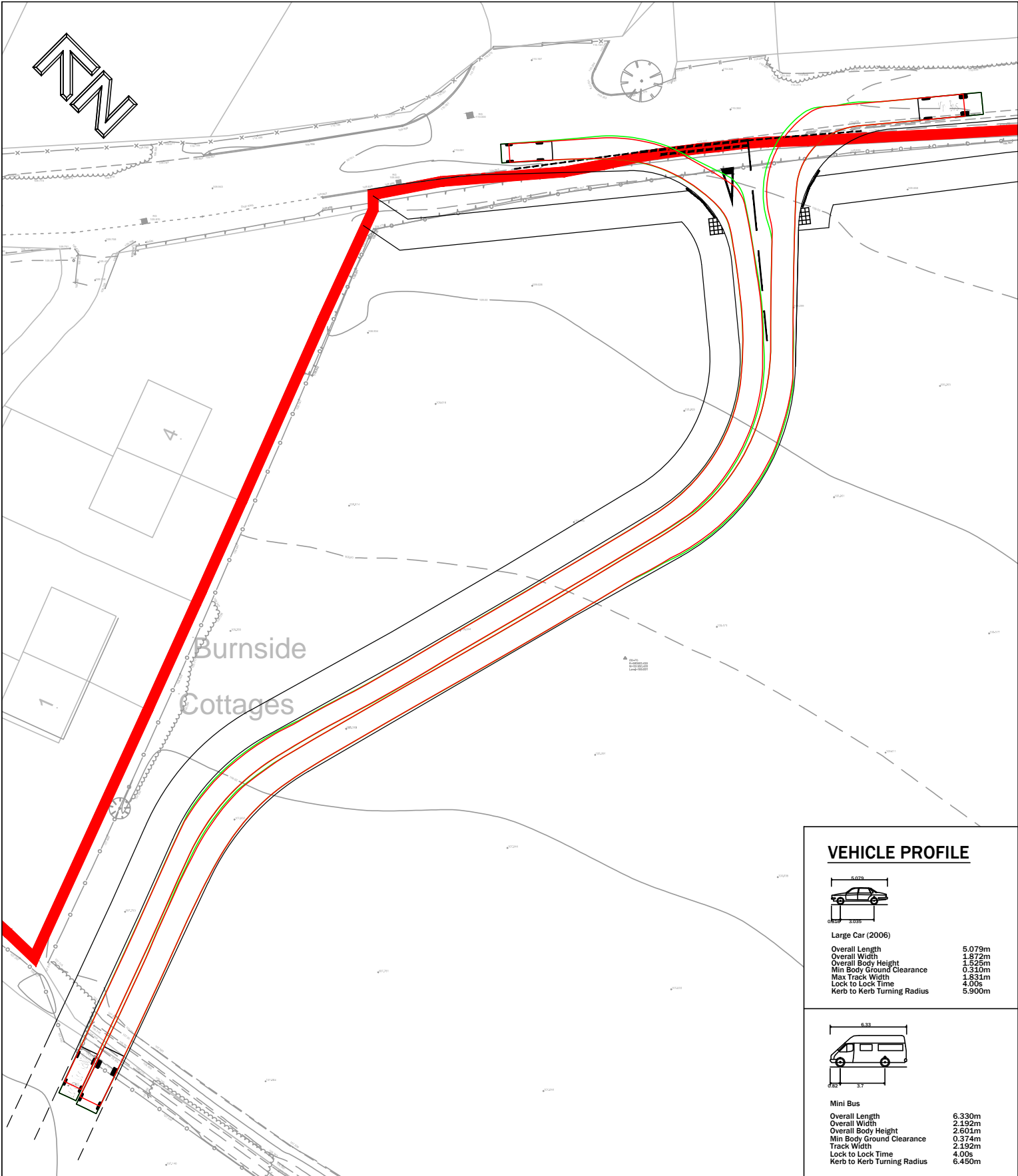
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## APPENDIX I

### TECHNCIAL DRAWINGS





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* Rev	* Date	* By	* Revision notes
Status			

INFORMATION

Project

OLD ASHFORD ROAD, LENHAM, KENT

Title

SPORTS FACILITY ACCESS SWEEP PATH  
ANALYSIS - MINI BUS & LARGE CAR

Drawn by  
VB

Issue date  
10 JAN 2020

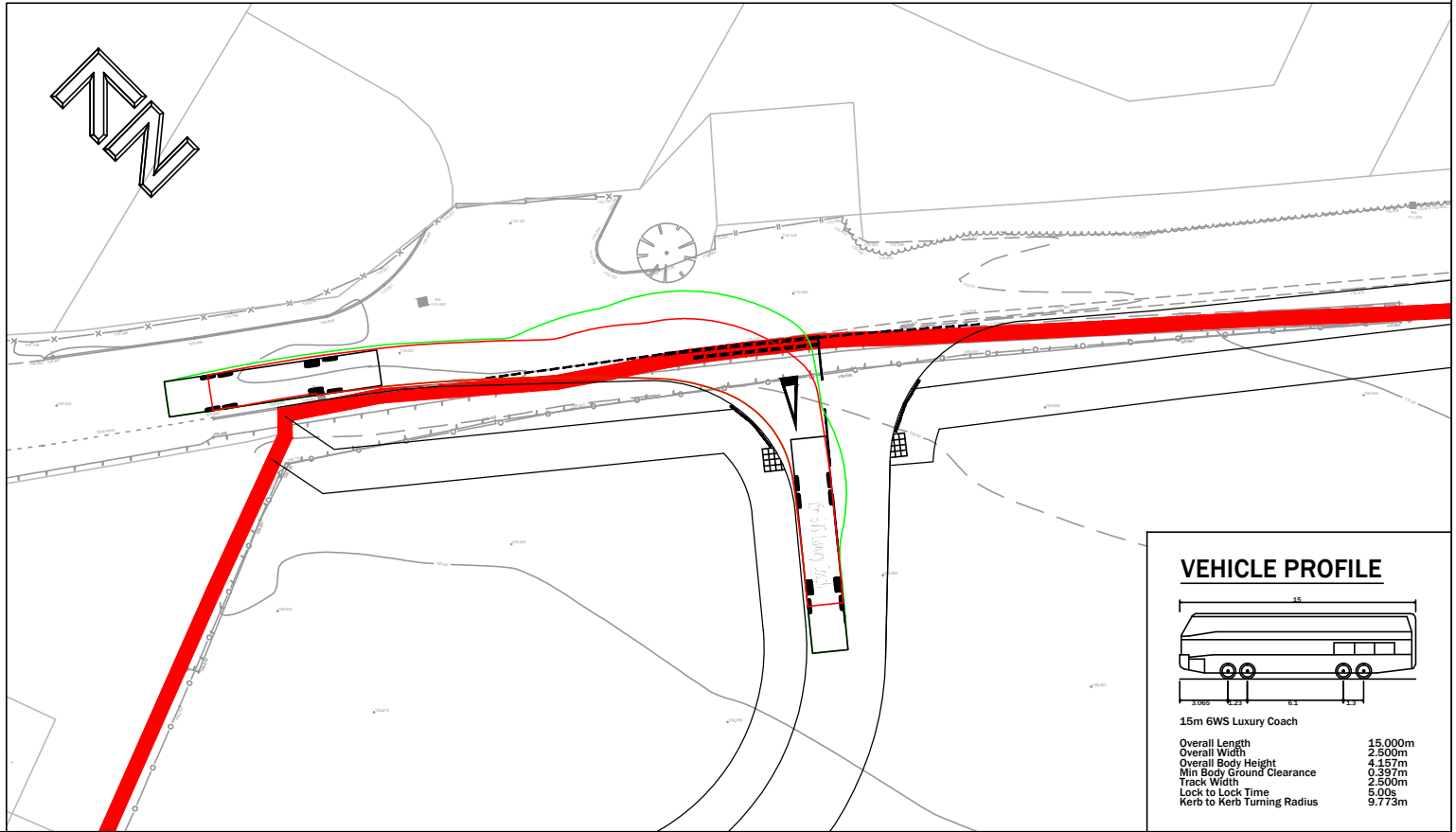
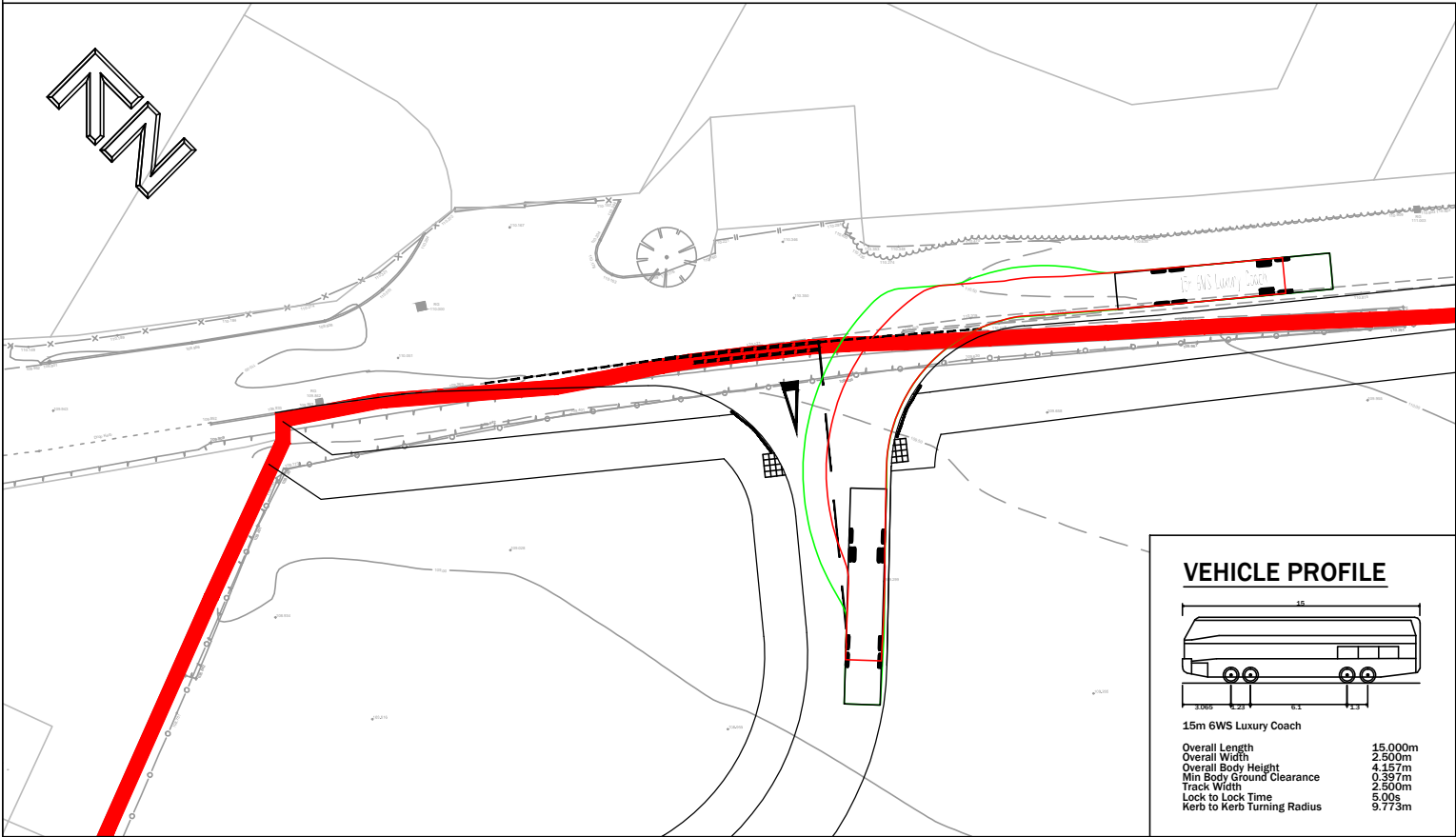
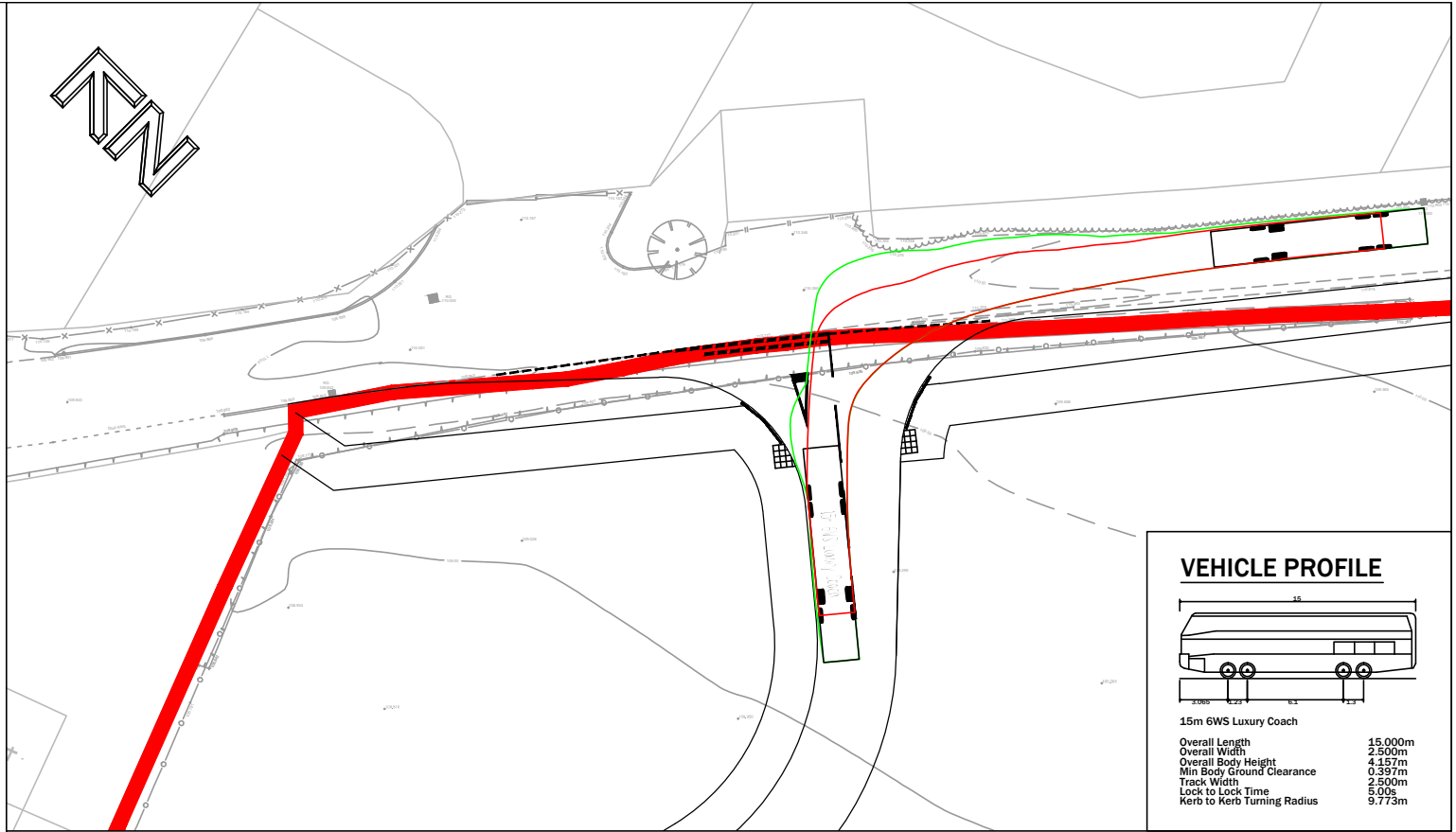
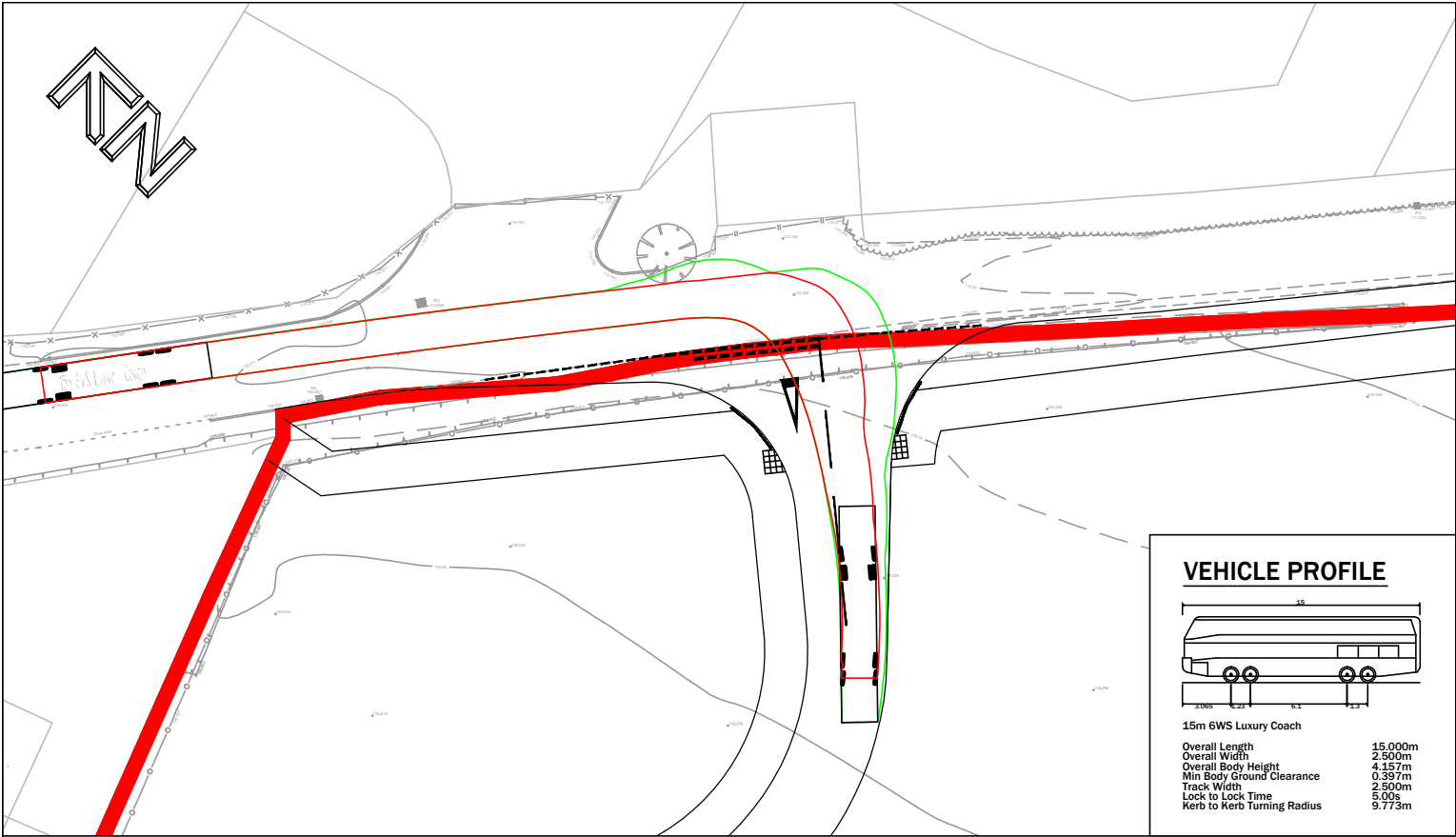
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C	08.01.20	VB	CHANGES FOLLOWING SCC COMMENTS
B	27.09.19	VB	RED LINE BOUNDARY UPDATE
A	12.09.19	VB	CHANGES FOLLOWING SIX:TEN RSA COMMENTS

Rev	Date	By	Revision notes
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Status

INFORMATION

Project

OLD ASHFORD ROAD, LENHAM, KENT

Title

SPORTS FACILITY ACCESS SWEEP PATH  
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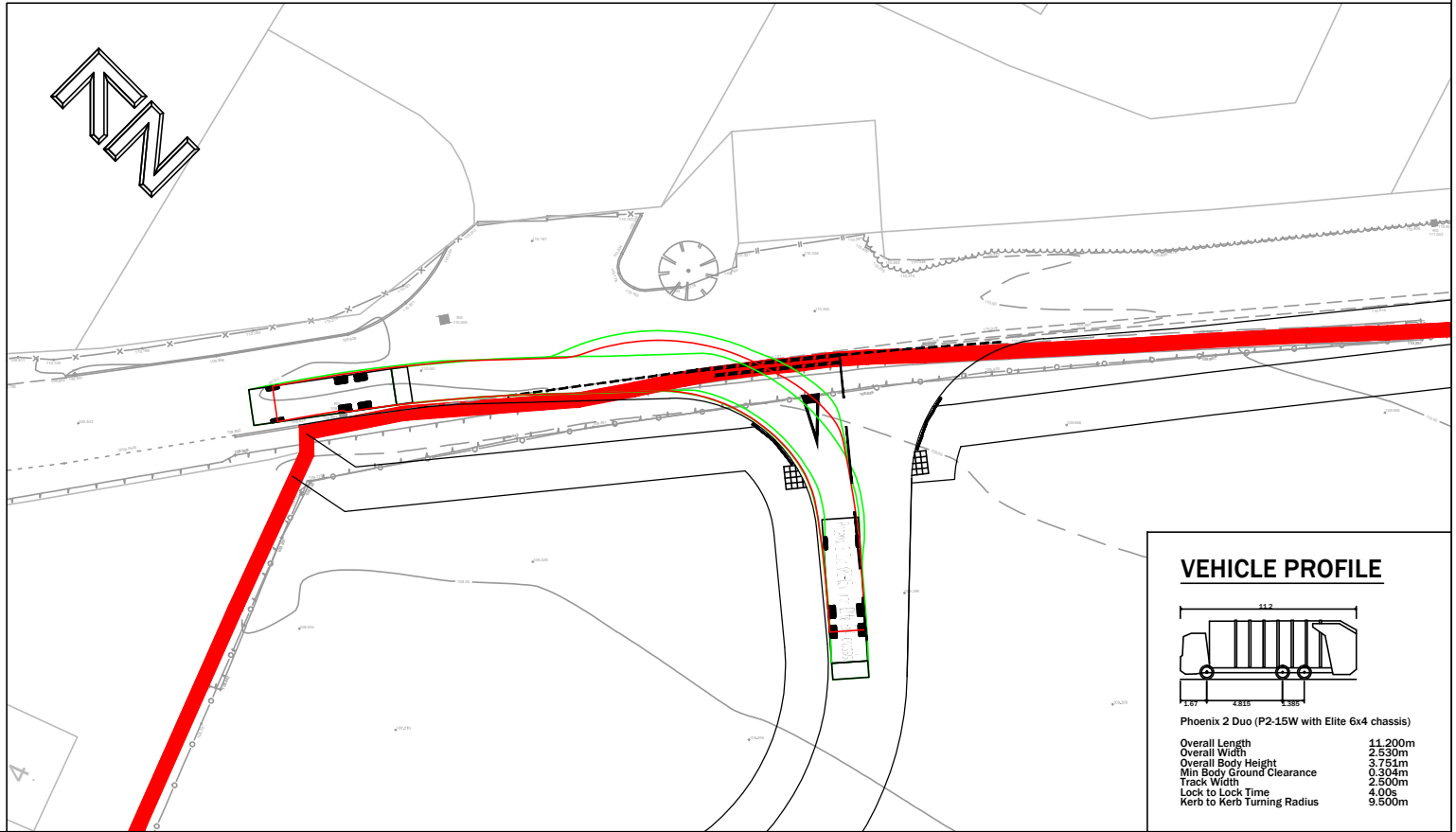
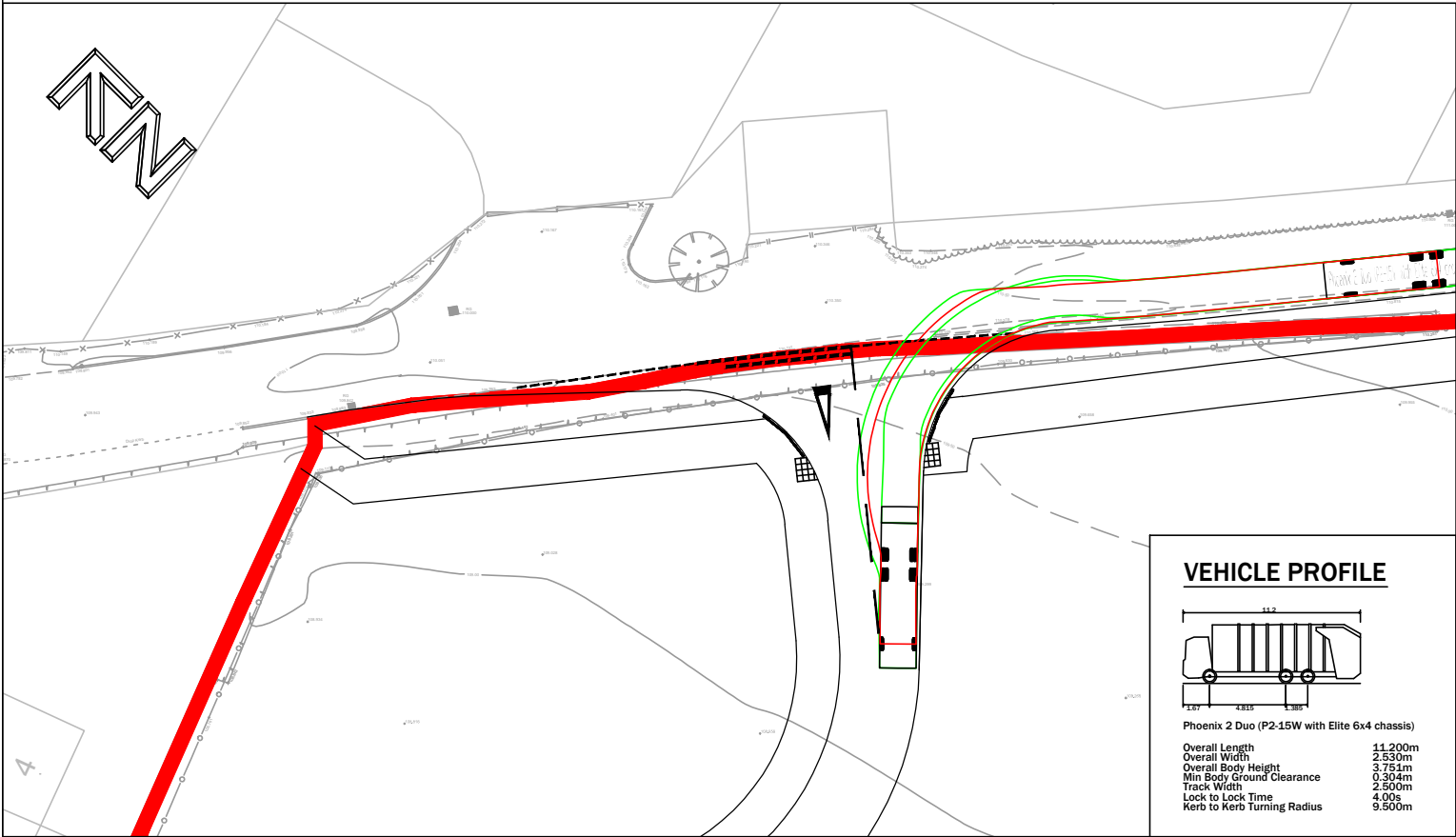
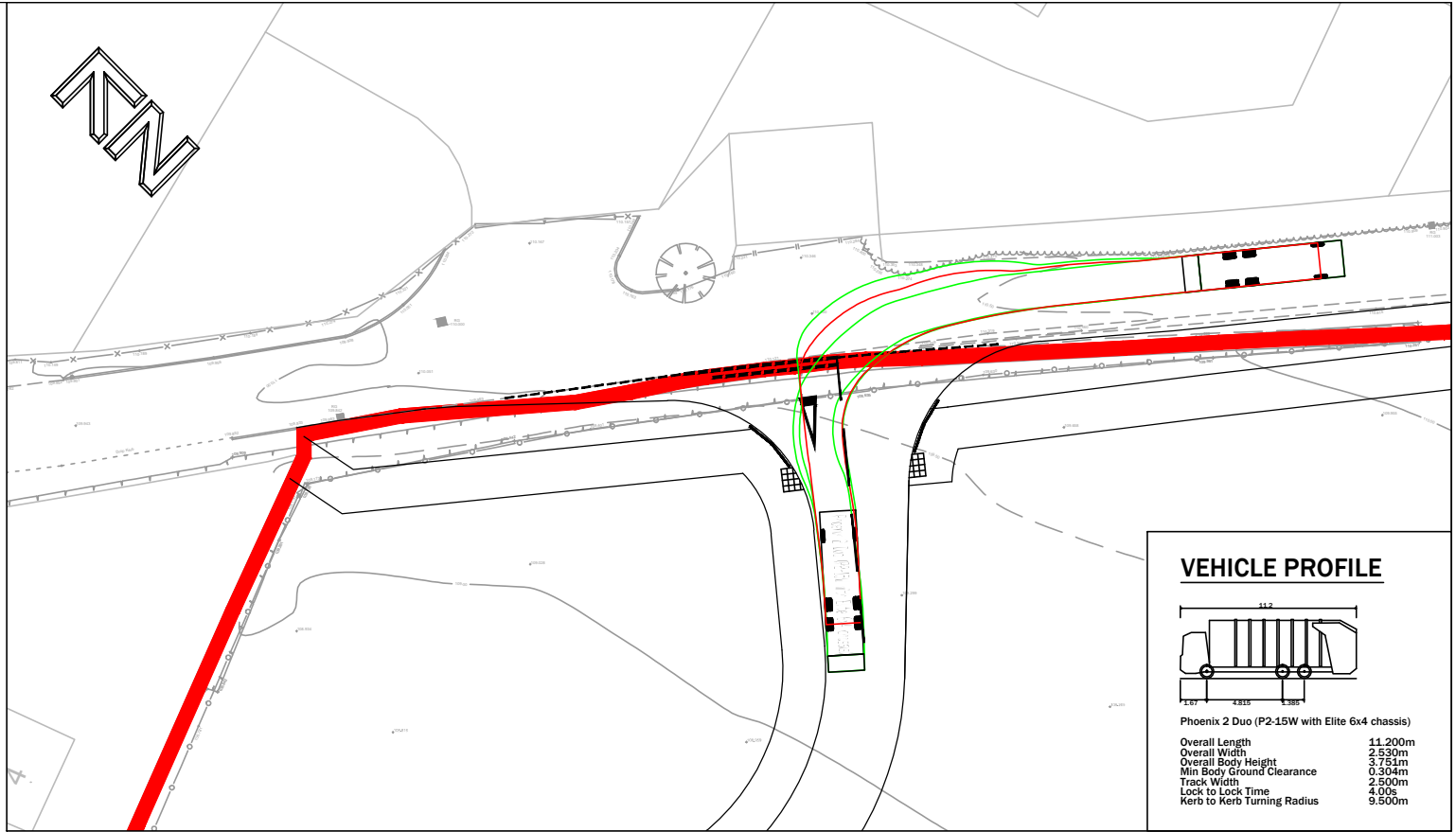
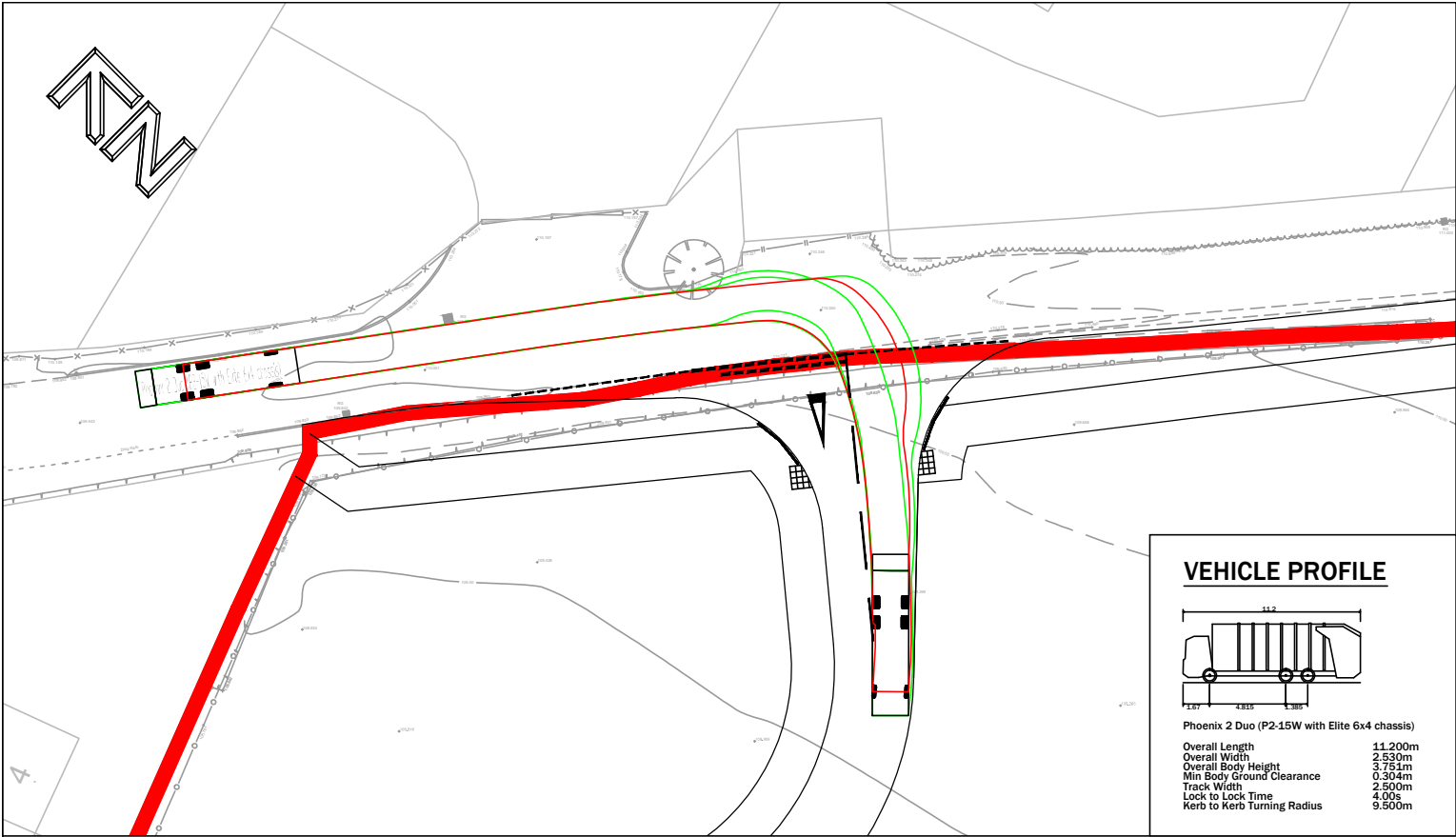
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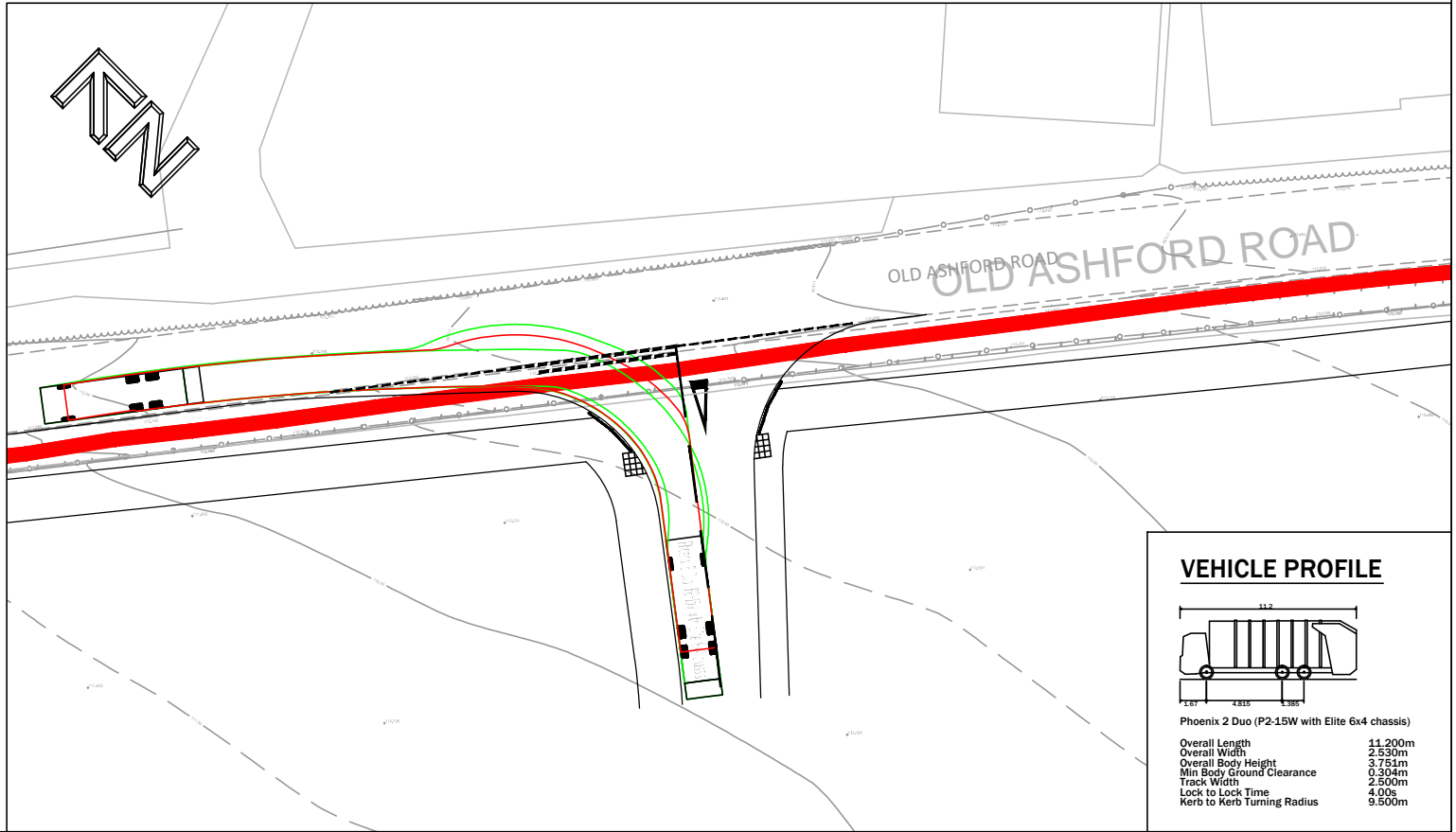
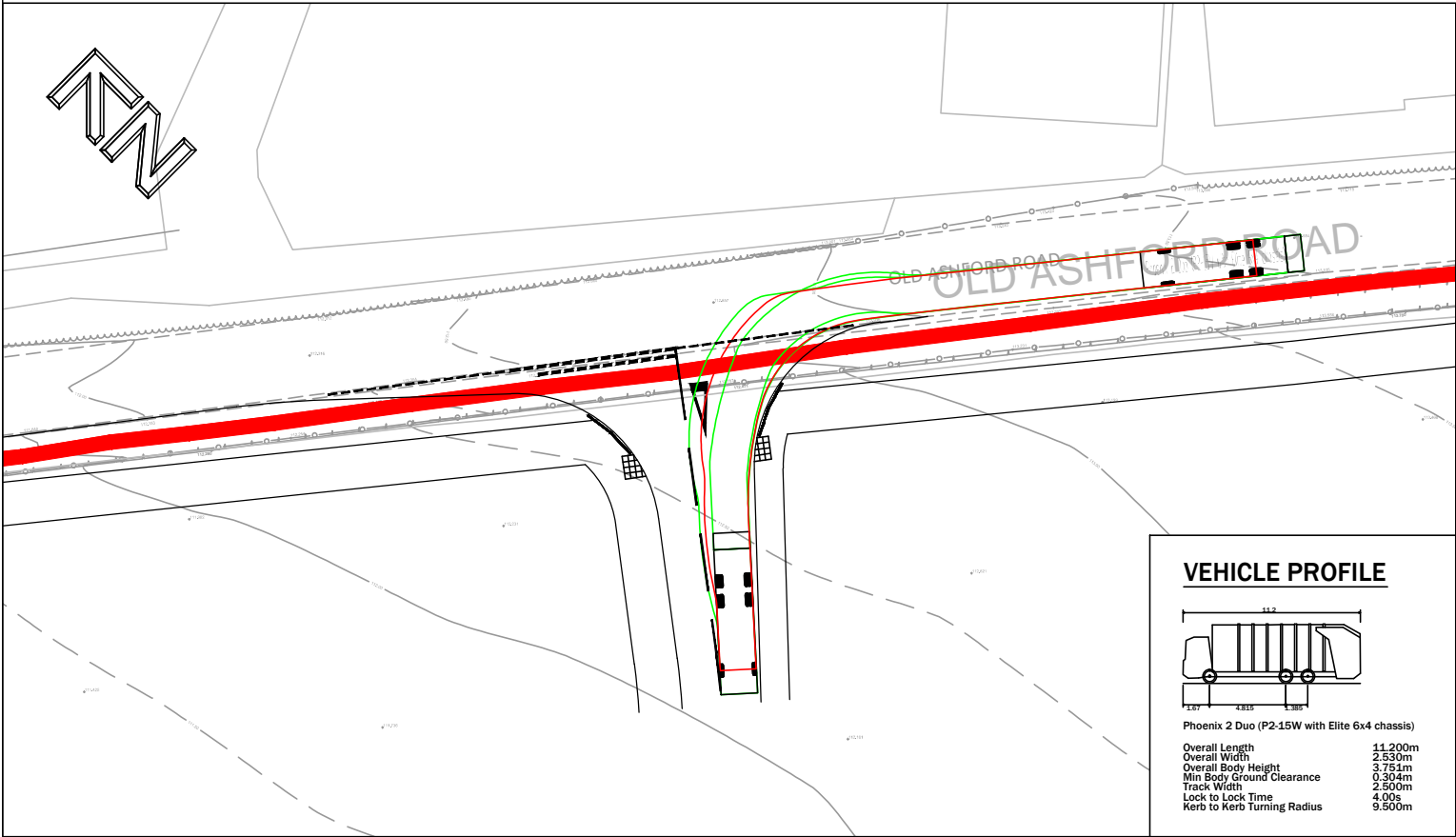
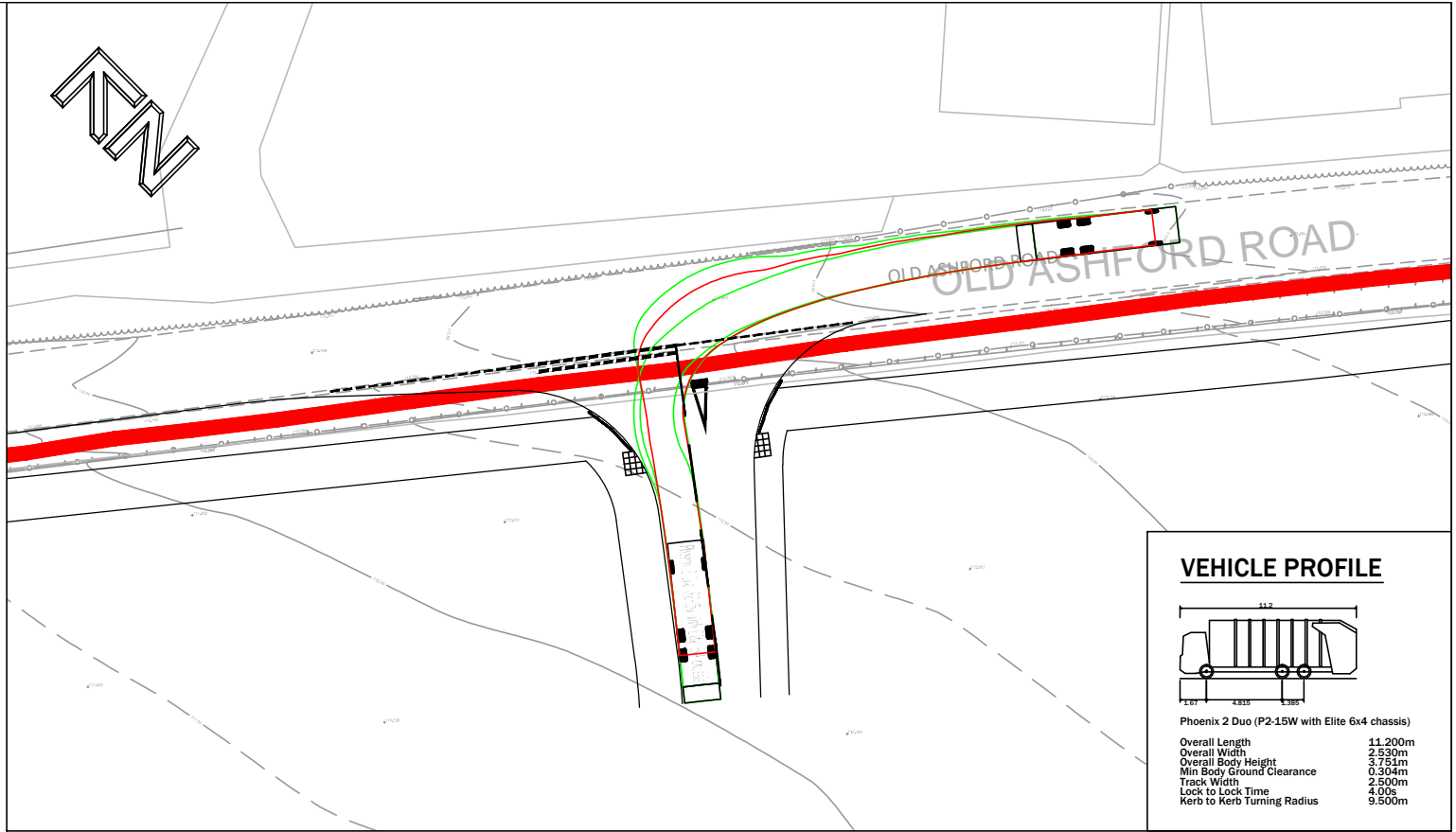
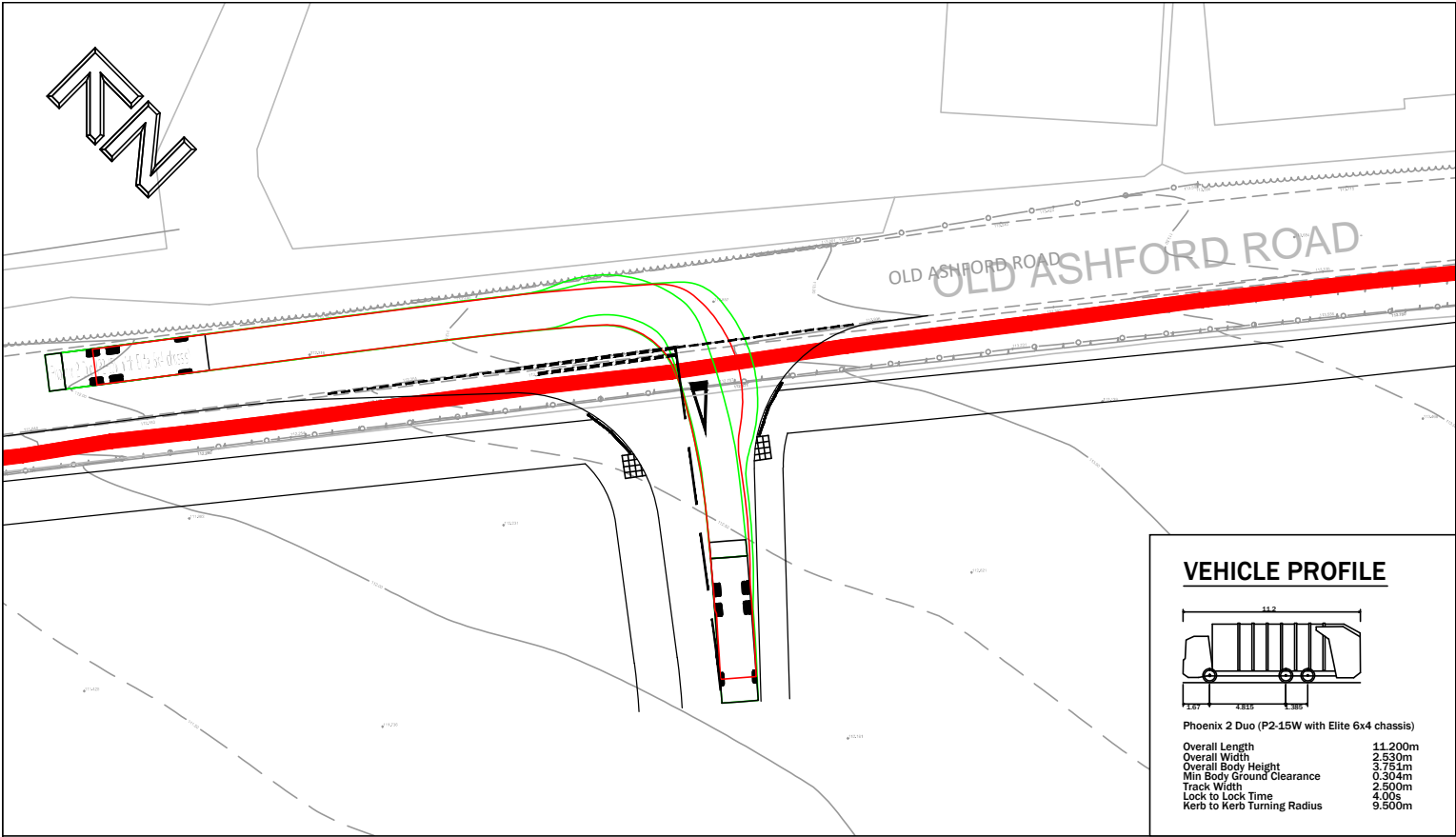
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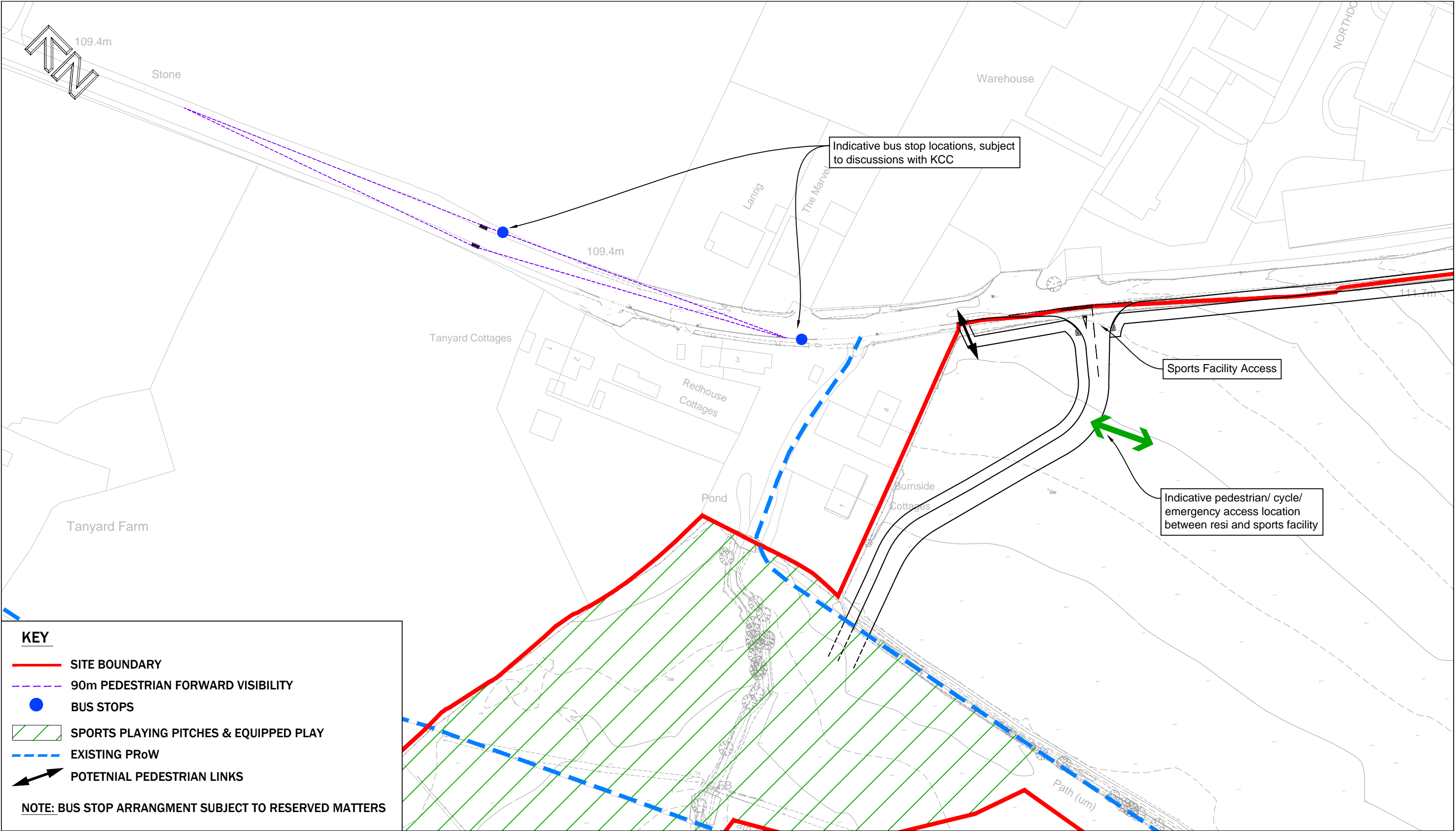



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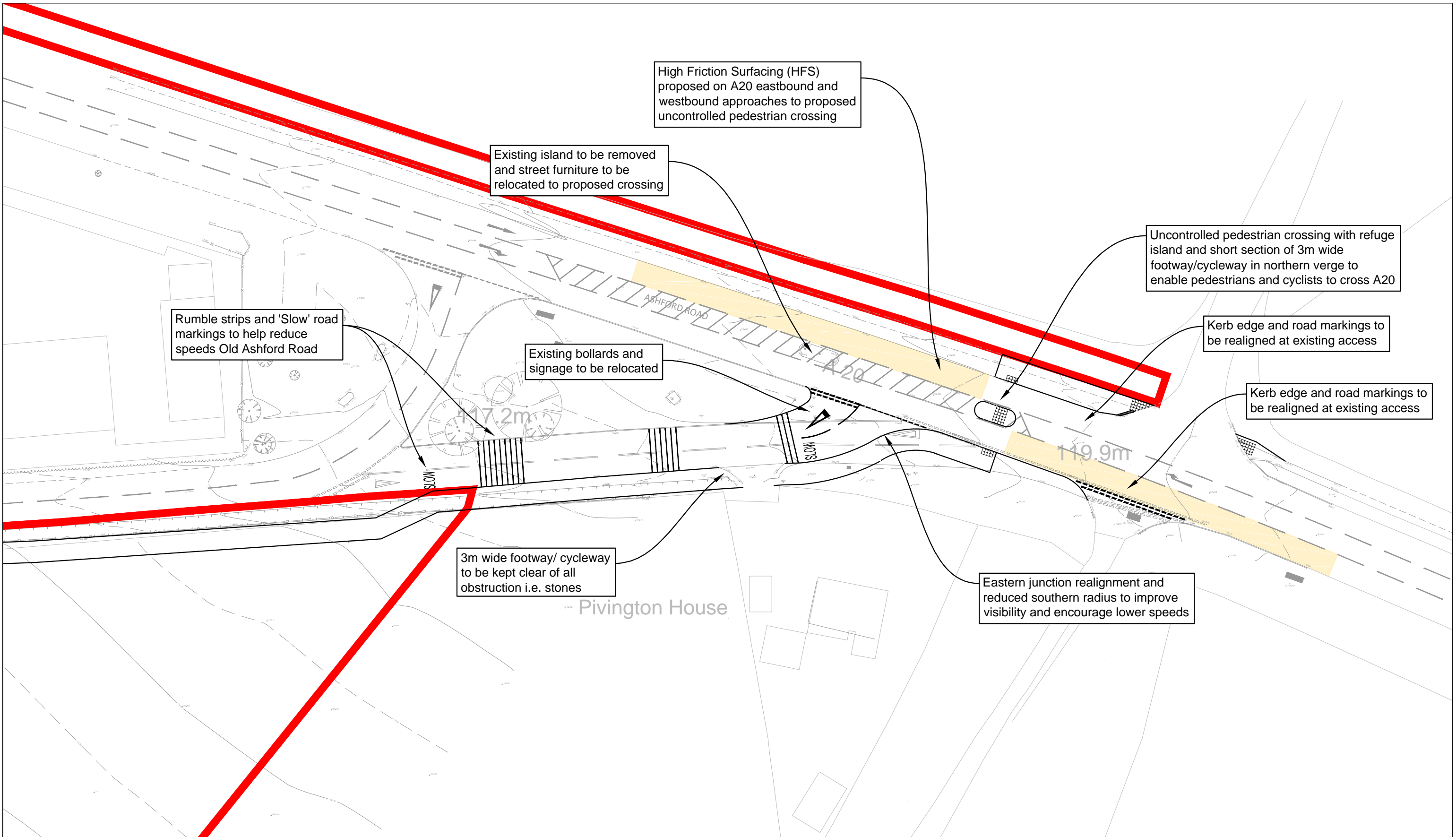


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E	08.01.20	VB	CHANGES FOLLOWING SCC COMMENTS
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C	12.09.19	VB	CHANGES FOLLOWING SIX:TEN RSA COMMENTS
B	02.09.19	VB	FOOTWAY UPDATES
A	15.08.19	VB	GEOMETRIES REMOVED FROM DRAWING
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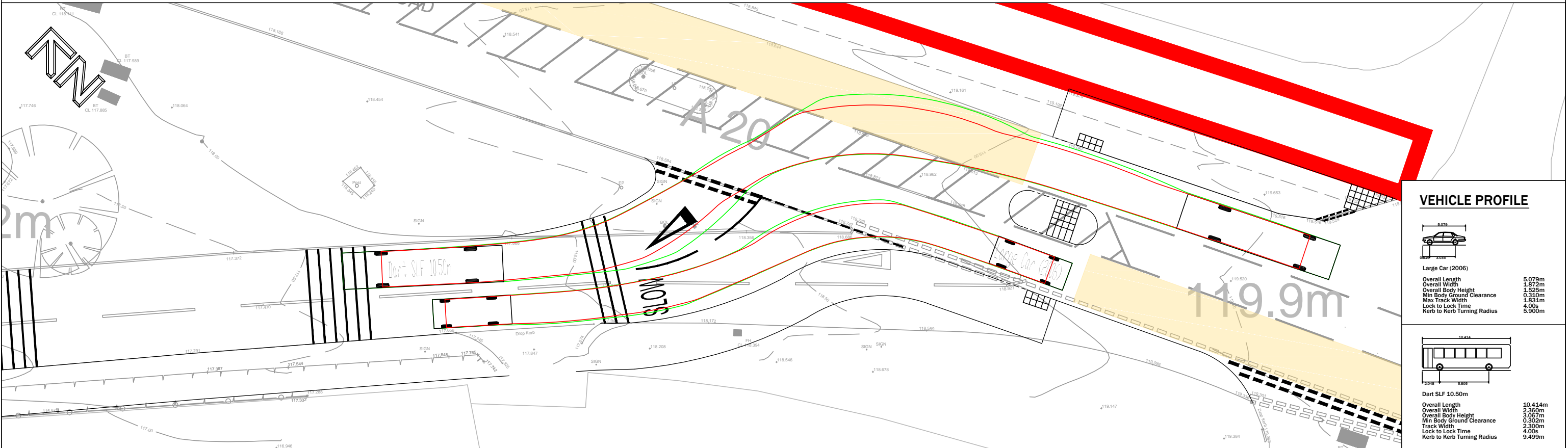
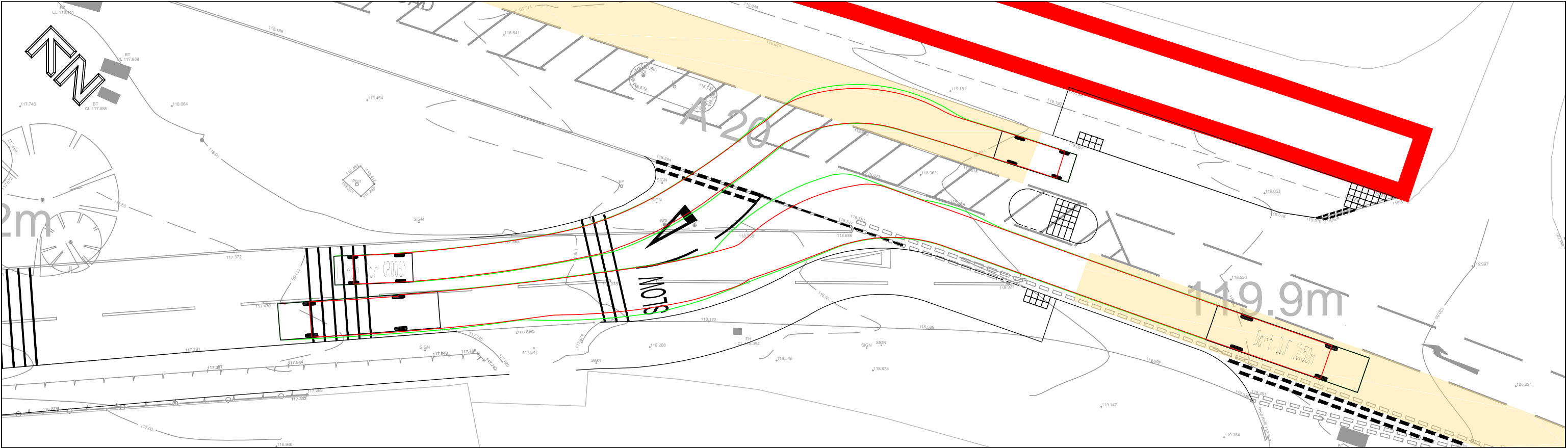
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
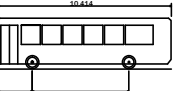
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**OLD ASHFORD ROAD, LENHAM, KENT**


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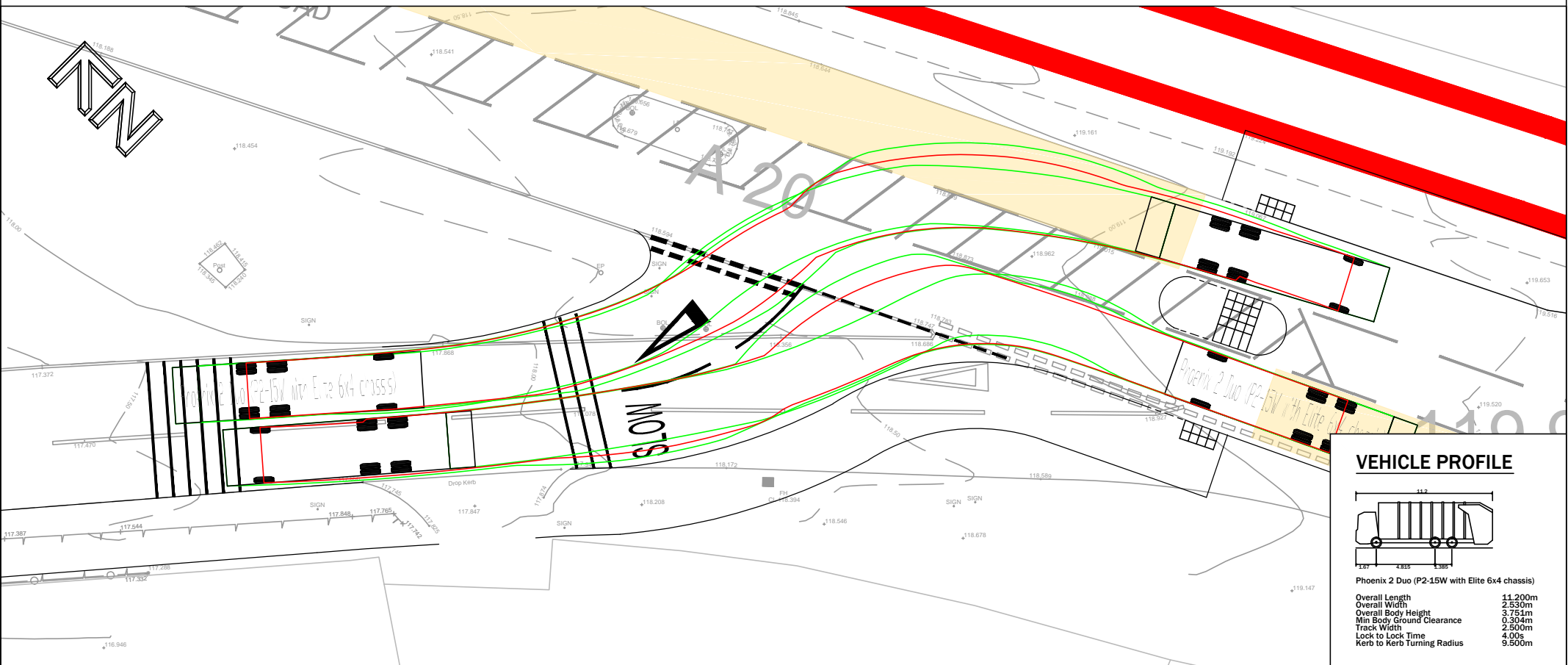
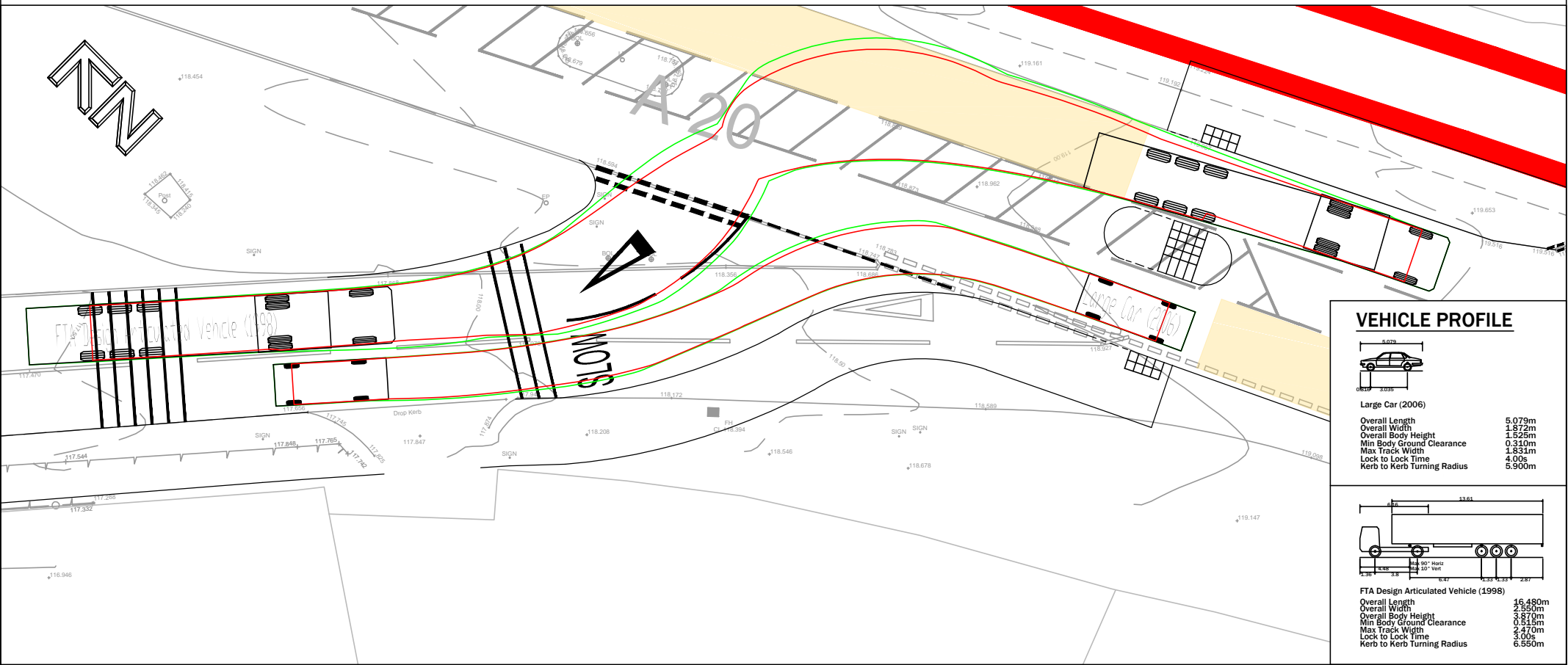
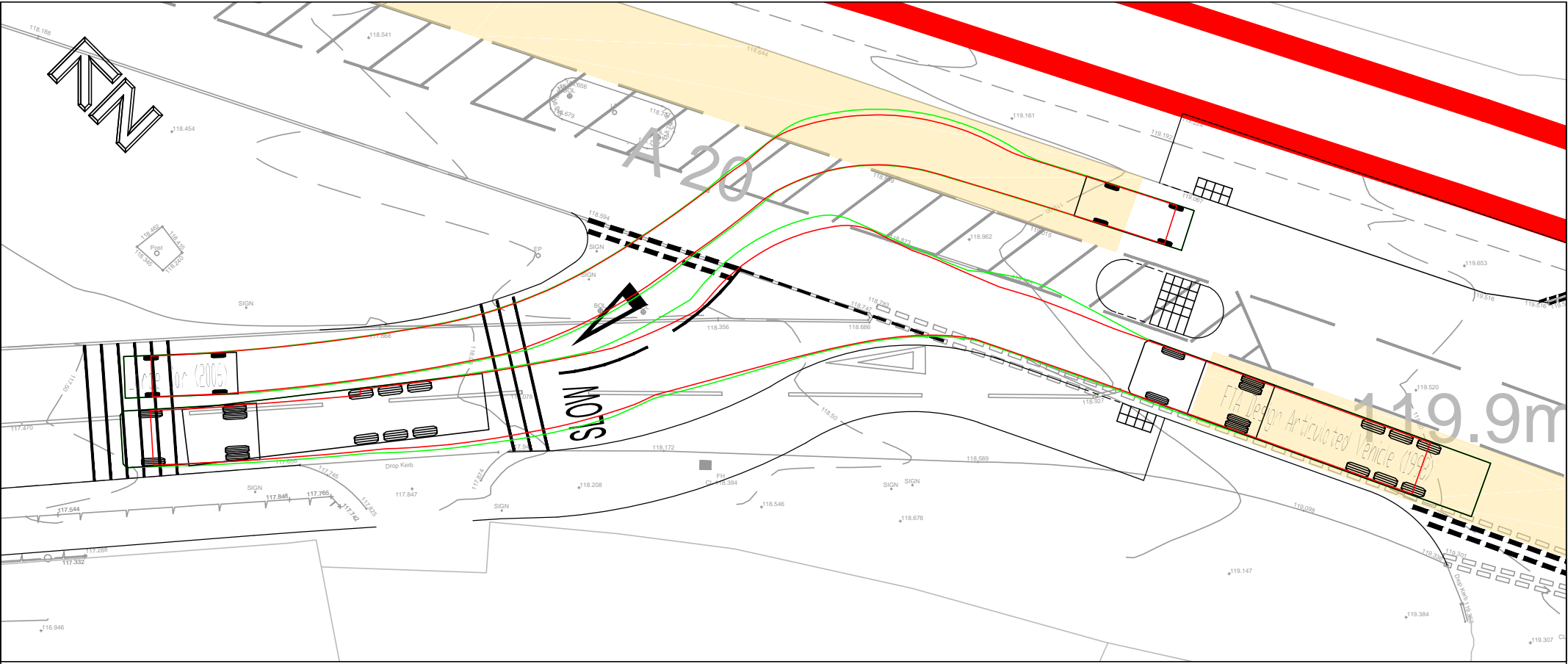
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VEHICLE PROFILE	
	
Large Car (2006)	
Overall Length	5.079m
Overall Width	1.872m
Overall Body Height	1.525m
Min Body Ground Clearance	0.330m
Max Track Width	1.831m
Lock to Lock Time	4.00s
Kerb to Kerb Turning Radius	5.900m
	
Dart SLF 10.50m	
Overall Length	10.414m
Overall Width	2.350m
Overall Body Height	3.067m
Min Body Ground Clearance	0.302m
Track Width	2.300m
Lock to Lock Time	4.00s
Kerb to Kerb Turning Radius	9.499m

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