



Tonbridge & Malling Borough Council
Development Control
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Highways and Transportation
Ashford Highway Depot
4 Javelin Way
Ashford
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Tel: 03000 418181
Date: 16 May 2019

Application - TM/18/02966/OA

Location - Development Site South Of Brampton Field Between Bradbourne Lane And Kiln Barn Road, Ditton, Aylesford, Kent

Proposal - Outline Application: Development of the site to provide up to 300 dwellings (Use Class C3) and provision of new access off Kiln Barn Road. All other matters reserved for future consideration.

Dear Maria

Thank you for re-consulting me on this planning application. Further to my previous consultation response, I have recently received a Technical Note from Ardent Consultant Engineers dated May 2019 and I have the following comments to make;

Access

Drawing number 182600-003D indicates the proposed site access, the location of the emergency access onto Kiln Barn Road and the pedestrian crossing facilities; these details are subject to a satisfactory safety audit. A safety audit has been requested and this has yet to be received. Drawing Number 182600-14 shows the swept path which is acceptable.

As stated previously, the illustrative masterplan includes a layout with long straight distributor roads which are likely to lead to speeding issues. It has been recommended that the layout is amended to a design with road alignments which physically reduce speeds to 20mph whilst allowing access for buses if required. The applicant has confirmed that this will be included at the reserved matters stage.

Accessibility

It is important that the development site links well with existing residential communities and facilities. There are existing public rights of way linking the site with the A20 to the north and to East Malling to the south west. Upgrades are required where possible to improve use for pedestrians and to allow use by cyclists. A scheme is required showing the proposed improvements.

Impact

The additional development generated traffic movements are shown below with a comparison with the 2018 recorded traffic flows:

Ditton Edge Site B	AM Peak (2 way flows)	2018 flows	PM Peak (2 way flows)	2018 flows
Kiln Barn Road south	32	92	24	238
Kiln Barn Road north	186	280	151	393
Bradbourne Lane	17	341	14	271
New Road, Ditton	169	435	137	476

The above is included in the Technical report at para. 2.22 Table 1 and is based on survey data which is included in Appendix E of the December 2018 Transport Assessment.

KCC's Visum model of the A20 area has recently been updated to reflect the current draft Local Plan development strategy and forecast junction capacity assessments have been completed for the key junctions along the A20 between the A228 and Coldharbour roundabout. The current application sites are included as allocations in the draft Local Plan; however, the quantum of development is different as outlined in the table below:

	Draft Local Plan Allocation	Current Planning Application
Ditton Edge (site B)	216	300
Parkside E. Malling (site C)	205	106

Whilst the total development numbers are broadly similar the distribution of traffic will be altered, and the impact may be changed. A first principles approach was agreed to assess the impact of the current planning applications using the latest Visum traffic flows which are available in the Visum Junction Assessments report.

The results for the junction of A20/New Road, East Malling are shown in Table 2, and the results for A20/Station Road/New Road, Ditton are shown in Table 3 of Ardent's Technical Note. Both the 2031 'do minimum' results differ from those in the Visum Junction Assessments report. This is concerning as the junction designs and Linsig files were provided in order that the background data could be matched.

Assessments have been completed for the following scenarios for both site B and for site C separately and cumulatively:

2031 'do minimum' scenario – no improvements and no Local Plan development

2031 'do something with KCC proposed improvements

2031 'do something' with Ardent proposed improvements

The Forecast Junction Assessments prepared for the T&M Local Plan have shown significant improvements to the capacity of the A20 junctions through highway improvements designed by KCC Highways and also by the opening of the Bellingham Way link road which is a requirement of the Aylesford Newsprint site redevelopment.

The capacity assessment scenarios modelled in the Technical Note include for scaled down improvements put forward by Ardent to mitigate the impact of the current planning applications. However, it seems that the traffic flows used in the modelling include the reduced level of traffic on the A20 due to the opening of the Bellingham Way link. Without the link road, the traffic

along the A20 will be higher and therefore the results of the capacity assessment will be different.

In order to assess the impact of the developments, including the draft Local Plan development strategy, the junctions should be modelled and assessed to ensure that the amended levels of development on the two sites do not result in an adverse impact on the highway network. This assessment should compare the 2031 Do Something Reg 19 scenario with the same scenario but with the amended levels of housing.

Additionally, although the draft Local Plan has been submitted to the Planning Inspectorate and is therefore a material consideration, it is a draft and therefore there is no guarantee that the development strategy will be approved. The development strategy includes for junction improvements and new link roads so additional assessments are required to inform of the impact of the planning applications without the Local Plan development strategy. This assessment should compare the 2031 Do Minimum, as set out in the Visum Junctions Assessment report, with the same scenario but including the development traffic and the mitigation proposed by the applicant.

There are several junctions along the A20 corridor which have been identified as having capacity problems and the traffic generated from the application sites will impact on these junctions. Highway improvements schemes are being progressed by KCC which, if delivered, would improve journey times and capacity through the A20 corridor. The delivery of the junction improvements is required to accommodate the traffic generated by the development and reasonable and proportionate contributions are sought, however the deliverability of these schemes is not assured as there are funding and/or land issues which are not resolved. KCC Highways are working to resolve these issues and bring forward the highway improvement schemes.

However, until these issues are resolved, and the additional information and clarification outlined above is provided, I would wish to make a holding objection to this application.

Further consideration will be given when further information is available to satisfy the concerns raised.

Yours sincerely

Louise Rowlands
Principal Transport & Development Planner