

EAST MALLING TRUST

PROPOSED RESIDENTIAL DEVELOPMENT: DITTON EDGE (APP RE: TM/18/02966/OA)

TRANSPORT ASSESSMENT ADDENDUM

REPORT REF. 182600-19A PROJECT NO. 182600 JANUARY 2020

PROPOSED RESIDENTIAL DEVELOPMENT: DITTON EDGE (APP REF: TM/18/02966/OA)

TRANSPORT ASSESSMENT ADDENDUM

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REPORT REFERENCE NO. 182600-19A PROJECT NO. 182600 JANUARY 2020

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DOCUMENT CONTROL SHEET

REV	ISSUE PURPOSE	AUTHOR	CHECKED	APPROVED	DATE
-	Draft Issue	PR	ATB	DRAFT	31.01.20
-	Final Issue	PR	PR	АТВ	31.01.20
A	Revised following Project Team comments	PR	PR PR	ATB	31.01.20 B

DISTRIBUTION

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1.1 Ardent Consulting Engineers (ACE) were instructed by East Malling Trust to prepare this Transport Assessment Addendum (TAA) for a proposed residential development at land off Kiln Barn Road in Ditton, Kent (also referred to as Ditton Edge or 'Site B'). This TAA has been prepared to accompany ongoing discussions relating to the planning application (reference: 18/02966/OA) to Tonbridge and Malling Borough Council (TMBC).

Background Information

- 1.2 This scheme has been assessed in conjunction with another scheme located to the west under the same ownership, and is referred to as Parkside or 'Site C'. Both schemes were reviewed together as part of the scoping process and application process, with this scheme referred to as Site B and the development to the west referred to as Site C. While two applications were submitted, both Transport Assessment's (TA's) reviewed the impact of the developments both in isolation and in combination.
- 1.3 The locations of the sites in question are shown in **Plate 1** below. Site B will comprise up to 300 residential units, whilst Site C will comprise up to 110 residential dwellings. Site C, known as 'Parkside' was recommended for approval at Planning Committee in November 2019 under planning permission reference 18/03008/OA. Members resolved to grant permission for the Parkside scheme, and the Decision Notice is currently pending subject to completion of the Section 106 Agreement.

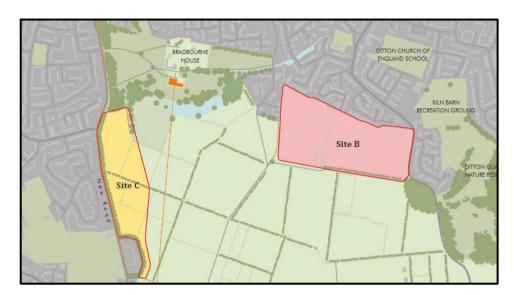


Plate 1: Indicative Locations of Sites B and C

Scope of Report

- 1.4 Since the application for Ditton Edge was submitted, ongoing consultation has been held with the local highway authority, Kent County Council (KCC), and further work has been undertaken to address their comments, including those relating to the traffic impacts. It is noted that as a result of these ongoing discussions, the current transport evidence is spread over various reports and email correspondence with KCC. Consequently, and as requested by KCC/TMBC, this TAA report seeks to provide an overview of the assessments undertaken to date, with a view to providing a succinct summary of the current position on key highways matters relating to Ditton Edge.
- 1.5 In addition, following recent consultation with KCC, an additional request to survey and assess the potential effect of the proposed Ditton Edge development on St Peter's Road and Bradbourne Lane, including the T-junction with the A20, has been made. Accordingly, this TAA seeks to address this remaining concern, along with some final queries raised by KCC regarding traffic flows and distribution.

1.6 Much of the detail regarding the existing conditions at the site and within the surrounding area is included within the previous TA prepared by ACE. Hence, it is considered that the existing conditions have not changed significantly since the time of the original Transport Assessment and therefore it is considered unnecessary to re-provide this level of detail in this TAA.

Policy Context

- 1.7 In keeping with current government policy contained within National Planning Policy Framework [NPPF] (MHCLG, Revised July 2019), this report seeks to demonstrate that the proposals will continue to be served by a safe and suitable site access arrangement and also look to determine whether the development proposals should have any cumulative impact within the surrounding highway network.
- In addition to national policy, consideration will be given to the current TMBC Local Plan and the emerging New Local Plan. Of particular importance is the A20 Corridor VISUM model Forecasting Report and Junction Assessments that have been prepared by Charles & Associates as part of the evidence base for the emerging Local Plan and identities highway impacts along the A20 corridor.
- 1.9 This TAA also considers current best practice advice contained in the document 'Manual for Streets' (DfT, 2007), its companion document 'Manual for Streets 2 Wider Application of the Principles' (CIHT, September 2010). Where applicable, this report will adhere to the guidance contained within the Design Manual for Roads and Bridges [DMRB]. In terms of local design guidance, due regard will be given to the Kent Design Guide and any relevant chapters.

Report Layout

- 1.10 Following this introduction, this report is structured as follows: -
 - Section 2.0 provides an overview of the ongoing discussions held with KCC and of the various Technical Notes and emails issued and exchanged;
 - Section 3.0 reviews the off-site impact of the proposed developments traffic; and
 - Section 4.0 provides a summary and conclusion.

2.0 SUMMARY OF POSITION

2.1 This section seeks to provide an overview of the current position in respect of key highways issues associated with the proposed development, and also summarises the ongoing consultation to date with KCC.

Pre-Application Discussions

2.2 Two formal pre-application meetings with TMBC were held, one of which the local highway authority attended. In addition, a Transport Briefing Note was prepared to inform an informal pre-application meeting which was held with KCC on 23rd July 2018 to discuss the scope of the TA.

Formal Submission

2.3 Following the above pre-application discussions with KCC, a Transport Assessment was prepared to accompany the Site B application. In addition to the Transport Assessment, a Travel Plan was also submitted to support the proposed development.

Post-Submission Feedback

Introduction

- 2.4 Since the submission of the application, the following key documents / emails (in chronological order) have been submitted / discussed with KCC and TMBC.
 - Email dated 18th February 2019 from KCC to Ardent Consulting Engineers;
 - Technical Note Potential Footpath at Kiln Barn Road (Report Ref: 182600-10B, February 2019);
 - KCC Comments (dated 21st January 2019);

- Technical Note Response to KCC Comments (Report Ref: 182600-17, May 2019);
- KCC Comments (dated 16th May 2019);
- Stage 1 Road Safety Audit Designer's Response (Report Ref: 182600-18, May 2019);
- Email dated 15th July 2019 from Ardent Consulting Engineers to KCC;
- Email dated 15th November 2019 from KCC to Ardent Consulting Engineers; and
- Email dated 19th December 2019 from TMBC to Savills.
- 2.5 The email correspondence and KCC formal responses outlined above are contained within **Appendix A** for ease of reference, while the various documents can be found on the planning portal.

Access

2.6 Following the submission of the Transport Assessment which showed the initial proposed access arrangement at Kiln Barn Road, various update have been made based on discussions with KCC. The access has now been agreed with the local highway authority following the ongoing consultation. The access is shown at **Drawing Number 182600-003E** and has been subject to a Stage 1 Road Safety Audit and Designer's Response. An emergency access is also provided at the southern end of the Kiln Barn Road frontage, as shown on the drawing and requested by KCC.

Public Rights of Way

2.7 Throughout the planning process, the Public Rights of Way team at KCC have sought for upgrades to the existing public footpath MR100 that extends south-west towards East Malling Station. As set out in the email from Ardent Consulting Engineers to KCC, dated 15th July 2019, it has been agreed that no improvements to the public right of way are to be conditioned.

2.8 In addition, there have been discussions of a footpath link from Site B towards the Orchard View development to south. The Technical Note – Potential Footpath at Kiln Barn Road (Report Ref: 182600-10B, February 2019) discussed the potential of said footpath link, but ultimately concluded it was not feasible. Accordingly, it has been agreed with the local highway authority that the footpath link will not be provided.

Traffic Generation

- 2.9 As outlined in the email, dated 15th November 2019, there was a query from the local highway authority regarding the difference in 2018 ATC flows and the 2018 turning count flows. It is important to note that the Kiln Barn Road ATC was taken directly outside of the site frontage, whilst the turning count was undertaken approximately 400 metres north of this location. Within this stretch of Kiln Barn Road, there are several residential cul-de-sacs, Ditton Community Centre and Ditton Recreation Ground.
- 2.10 Considering the significant amount of development between the two survey locations, it is reasonable to assume that the difference in traffic flows outlined by the local highway authority is to be expected and shouldn't be used for comparison. Therefore, it is considered that the flows that have been presented throughout the planning application are correct and this should allay the concern from the local highway authority.

Traffic Distribution

2.11 The local highway authority also requested the distribution of traffic from the development is re-checked as it had calculated significantly different proportions to those presented within the Technical Note – Response to KCC Comments (Report Ref: 182600-17, May 2019). Further review of this matter has been undertaken within Section 3.3 of this report.

Junction Modelling

- 2.12 The following junctions were modelled as part of the Transport Assessment.
 - 1. A20 / Station Road / New Road signalised junction;
 - 2. A20 / Bradbourne Road ghost island junction;
 - 3. A20 / New Hythe Lane signalised junction;
 - 4. A20 / New Road / Hotel signalised junction;
 - 5. A20 / Lunsford Lane / Winterfield Lane signalised junction;
 - A20 / Ashton Way / Oxley Shaw Lane / Castle Way signalised junction;
 - 7. New Road / Site C Access priority-controlled T-junction; and
 - 8. Kiln Barn Road / Site B Access priority-controlled T-junction.
- 2.13 Subsequently, all junctions were re-modelled to reflect ongoing discussions with the local highway authority and revised traffic flows. These were presented within the Technical Note Response to KCC Comments (Report Ref: 182600-17, May 2019).
- 2.14 Within the email from Ardent Consulting Engineers to KCC, dated 15th July 2019, further modelling of the A20 / Station Road / New Road junction was presented to reflect the agreed S278 improvement scheme associated with the Ditton Edge proposals.
- 2.15 As outlined in the email from KCC to Ardent Consulting Engineers, dated 15th November 2019, all junction modelling has been agreed and no further work is required, apart from at the A20 / Bradbourne Lane ghost island junction. Following queries from the local highway authority, TMBC requested that a new traffic survey is undertaken at A20 / Bradbourne Lane junction. Further details are contained at Section 3.0.

Off-Site Junction Improvements

2.16 As outlined in the email dated 15th July 2019, it was confirmed that the S278 improvement scheme at A20 / Station Road / New Road junction was to be delivered fully as part of the Ditton Edge proposals. The scheme is shown at **Drawing Number 182600-017A**. These improvements are consistent with KCC's preferred upgrades to mitigate predicted Local Plan growth. The following **Table 2.1** summarises the LinSig model results for this junction, confirming that whilst the improved layout would still operate over capacity, it would still provide significant betterment compared to the existing layout.

Scenario	AM Peak	PM Peak						
Existing Layout								
2031 'Do Minimum' Background	-106.4%	-82.3%						
2031 'Do Minimum' Background + Site B	-122.1%	-88.7%						
2031 'Do Minimum' Background + Site C	-107.4%	-83.5%						
2031 'Do Minimum' Background + Site B and C	-122.1%	-90.7%						
2031 'Do Something' Background	-77.1%	-80.9%						
2031 'Do Something' Background (- Site B Local Plan Flows)	-66.5%	-74.5%						
2031 'Do Something' Background (- Site B Local Plan Flows) + Site B	-81.2%	-82.1%						
2031 'Do Something' Background (- Site C Local Plan Flows)	-75.1%	-79.4%						
2031 'Do Something' Background (- Site C Local Plan Flows) + Site C	-76.5%	-80.9%						
2031 'Do Something' Background (- Site B/C Local Plan Flows)	-65.5%	-71.9%						
2031 'Do Something' Background (- Site B/C Local Plan Flows) + Site B and C	-78.4%	-80.9%						
Proposed S78 Improvements								
2031 'Do Minimum' Background + Site B	-68.6%	-37.0%						
2031 'Do Minimum' Background + Site C	-48.7%	-28.0%						
2031 'Do Minimum' Background + Site B and C	-69.4%	-37.0%						
2031 'Do Something' Background	-32.8%	-37.8%						

2031 'Do Something' Background (- Site B Local Plan Flows) + Site B	-35.3%	-41.7%
2031 'Do Something' Background (- Site C Local Plan Flows) + Site C	-31.1%	-37.7%
2031 'Do Something' Background (- Site B/C Local Plan Flows) + Site B and C	-35.3%	-40.2%

Table 2.1: A20/Station Road/New Road LinSig results

- 2.17 Within the same email, it was also confirmed following ongoing discussions with KCC that the following S106 contributions were to be offered as part of the Ditton Edge scheme. These amounts are proportionately consistent with the recently approved White Post Fields scheme to the east and have been calculated on a per dwelling basis. Subject to these contributions, not further S278 improvements are necessary along the A20 corridor as part of the proposed development.
 - £464,286.00 for A20 corridor highway improvements (£1547.62 per dwelling)
 - £282,000.00 for A20 corridor bus journey time improvements (£940.00 per dwelling)
 - £746,286.00 Total

Summary of Position

- 2.18 In light of the above information, it is considered that the majority of items have been agreed. Based on the recent KCC comments in November 2019, it is considered that the below information is still outstanding. It is therefore sought that this TAA will seek to address the remaining comments from the local highway authority such that they can be in a position provide their 'in-principle' support to the scheme.
 - Traffic distribution;
 - Impact on St Peters Road / Bradbourne Lane;
 - A20 / Bradbourne Lane junction modelling.

3.0 HIGHWAY IMPACT

3.1 Introduction

- 3.1.1 As discussed in **Section 2.0**, the modelling and mitigation proposed at the nearby A20 signal junctions has now been agreed with the local highway authority, through a combination of S278 works and S106 contributions. This junction is therefore the only remaining area of consideration for the local highway authority, and this section solely focuses on the development's impact at the A20 / Bradbourne Lane junction, as well as the operation of Bradbourne Lane itself.
- 3.1.2 As requested by the local highway authority, peak hour manual classified turning counts and queue surveys were conducted by a specialist survey company at the A20 / Bradbourne Lane junction. The survey took place on 14th January 2020, which was agreed as suitable with KCC given planned roadworks at the A20/New Hythe Lane junction nearby due to start in early February. The results have been used to determine the existing traffic flow at the junction and then in the future year scenarios, as discussed below. Full details of the manual classified turning count results are included within Appendix B. The baseline flows are shown at Figure 14 for reference.

3.2 Future Year Assessment

3.2.1 As with all the previous assessments, in order to be consistent with the modelling presented to support the Local Plan, a future year of 2031 has been adopted. The A20 / Bradbourne Lane junction was not included within the strategic model for the county and the Local Plan. Hence, it was previously agreed with KCC that reasonable assumptions could be made at the junction. As presented within the Transport Assessment, these comprised the following assumptions:

- The through traffic along the A20 has been taken from the A20 / New Hythe Lane junction; and
- The turning movements in / out of Bradboune Lane has been assumed to be 30% of that of the A20 / Station Road / New Road junction.
- 3.2.2 Since then, as discussed in **Section 2.0**, the local highway authority has requested that the model is based on the peak hour count that has now been undertaken. Accordingly, the baseline flows will be growthed from 2020 to 2031 using factors of 1.13 for the morning peak hour and 1.13 for the evening peak hour. Full details in respect of the TEMPro growth factor calculations are contained at **Appendix C.** The growthed flows are shown at **Figure 15**.
- 3.2.3 Following on from the above, the traffic flows figures have been updated to reflect the updated information at the A20 / Bradbourne Lane junction. As before and agreed with the local highway authority, the following traffic flow scenarios are to be assessed.
 - i. 2031 'Do Minimum' Background Traffic Flows
 - ii. 2031 'Do Minimum' Background + Site B Traffic Flows
 - iii. 2031 'Do Minimum' Background + Site B + Site C Traffic Flows
 - iv. 2031 'Do Something' Background Traffic Flows
 - v. 2031 'Do Something' Background + Site B Traffic Flows
 - vi. 2031 'Do Something' Background + Site B + Site C Traffic Flows

3.3 Distribution and Assignment

3.3.1 As outlined in the email from the local highway authority, dated 15th November 2019, the distribution of traffic from the development has been queried. For ease of reference, the details of the distribution from the Technical Note – Response to KCC Comments (Report Ref:

Transport Assessment Addendum

- 182600-17, May 2019) have been re-provided below, but with further supplementary information that outlines the methodology.
- 3.3.2 The full 2-hour AM and PM turning counts at the New Road/Kiln Barn Road/St Peter's Road T-junction have been reviewed to estimate the potential percentage splits of arrivals and departures from the Ditton Edge site, these are summarised in Plate 2 below. The white boxes are morning peak hour, while the shaded boxes represent evening peak hour flows.

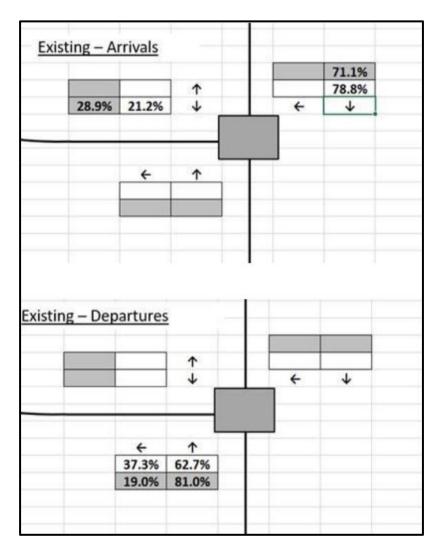


Plate 2: Observed Turning Proportions to/from Kiln Barn Road (South) at the New Road/Kiln Barn Road/St Peter's Road T-junction

- 3.3.3 The table contained at **Appendix D** summarises the count survey information. In order to calculate the distribution from the site, the movements that are not associated to the development traffic (i.e. left turn from St. Peters Road to New Road) have been omitted from the calculations. The tables then show the percentage of traffic associated with each movement based on the total of arrivals and departures from the counts. These figures have been double-checked since they were first presented in the Transport Technical Note, and it is considered that these accurately reflect the recorded proportional distribution of movements at this junction.
- 3.3.4 In light of the above and the rationale discussed within the Technical Note Response to KCC Comments (Report Ref: 182600-17, May 2019), it is considered that the distribution shown at **Figures 1** and **2** is acceptable.

3.4 Capacity Assessment

3.4.1 To establish if the existing A20 / Bradbourne Lane priority-controlled junction operates satisfactorily and whether it would have sufficient capacity in the future year scenarios, the PICADY model was run again with the revised flows. Full copies of the PICADY assessments are contained at **Appendix E**, with an extract of the summary table shown below in **Plate 3**.

	AM					РМ				
	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Set ID	Queue (PCU)	Delay (s)	RFC	LOS
Existing Arrangement - 2031 'Do Minimum' Baseline										
Stream B-C		1.6	23.20	0.62	С		0.2	9.60	0.19	Α
Stream B-A	D1	0.0	36.99	0.03	Е	D2	0.1	20.02	0.06	С
Stream C-AB		0.3	10.97	0.25	В		0.4	10.46	0.31	В
		Existin	ıg Arranç	jemei	nt - 20)31 'D o	Minimum' +	Site B		
Stream B-C		2.0	28.52	0.68	D		0.2	9.91	0.20	Α
Stream B-A	D3	0.0	49.75	0.04	Е	D4	0.1	22.09	0.07	С
Stream C-AB		0.4	11.68	0.27	В		0.5	10.96	0.33	В
	Existing Arrangement - 2031 'Do Minimum' + Site B + Site C									
Stream B-C		2.1	28.85	0.68	D	D8	0.3	9.99	0.20	А
Stream B-A	D7	0.0	52.17	0.05	F		0.1	22.69	0.07	С
Stream C-AB		0.4	11.74	0.27	В		0.5	11.07	0.33	В
		Existing Arrangement - 2031 'Do Something' Baseline								
Stream B-C	D9	1.6	23.20	0.62	С		0.2	9.60	0.19	Α
Stream B-A		0.0	36.99	0.03	E	D10	0.1	20.02	0.06	С
Stream C-AB		0.3	10.97	0.25	В		0.4	10.46	0.31	В
	Existing Arrangement - 2031 'Do Something' + Site B									
Stream B-C		2.0	28.52	0.68	D		0.2	9.91	0.20	Α
Stream B-A	D11	0.0	49.75	0.04	E	D12	0.1	22.09	0.07	С
Stream C-AB		0.4	11.68	0.27	В		0.5	10.96	0.33	В
Existing Arrangement - 2031 'Do Something' + Site B + Site C										
Stream B-C		2.1	28.85	0.68	D		0.3	9.99	0.20	Α
Stream B-A	D15	0.0	52.17	0.05	F	D16	0.1	22.69	0.07	С
Stream C-AB		0.4	11.74	0.27	В		0.5	11.07	0.33	В

Plate 3: PICADY Summary Results for A20 / Bradbourne Lane Junction

- 3.4.13 As shown above, all 2031 scenarios operate within capacity, with a maximum RFC of 0.68 in the morning peak hour on the Bradbourne Lane arm. It also operates at a maximum delay of 52 seconds and a queue of 2 PCUs. Furthermore, it is worth noting that the wider planned Local Plan improvements along the A20 corridor would ease congestion elsewhere and relieve pressure on this junction.
- 3.4.14 The recorded queue survey results for the A20/Bradbourne Lane junction show slightly higher recorded queues of up to 5 vehicles on Bradbourne Lane. However, based on the survey these queues are short-lived, with low or zero queuing for most of the period. Furthermore, in the morning peak the survey notes periods of queuing past the junction on the A20 from further afield (i.e. traffic signals), and the proposed strategic improvements along this corridor should help to alleviate some of these queues and in turn minimise queues and delays on Bradbourne Lane itself.

3.4.15 Overall, the above assessment has shown that at the 2031 future year scenarios, the junction would operate within capacity. The residual cumulative impacts cannot therefore be considered severe, and it would therefore be in accordance with the principles of Paragraph 109 of the NPPF.

3.5 Off-Site Impacts

- 3.5.1 **Figure 5** shows that there is predicted to be 17 additional two-way movements in the busiest peak hour on Bradbourne Lane / St Peter' Road as a result of the development. Comparing this to the future 2031 flows, it is confirmed that the increases would be insignificant, with traffic flows increased by 5.04%.
- 3.5.2 In considering the potential impact of the above increases, it is considered that an additional peak hour vehicle movement every 3 minutes on average (two-way) would be relatively imperceptible and would not lead to severe impacts, either in terms of traffic delays or highway safety. In terms of safety, the extract in **Plate 4** below shows Crashmap data for Kiln Barn Road/Bradbourne Lane, which confirms that no Personal Injury Accidents were recorded during the most recent 5-year available period. The minor increases in peak hour flows on this route are therefore considered to have no severe impacts on highway safety, and evidence suggests that this is a safe route despite existing on-street parking and some sections of narrow carriageway.

January 2020

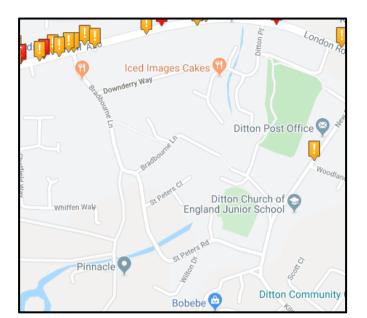


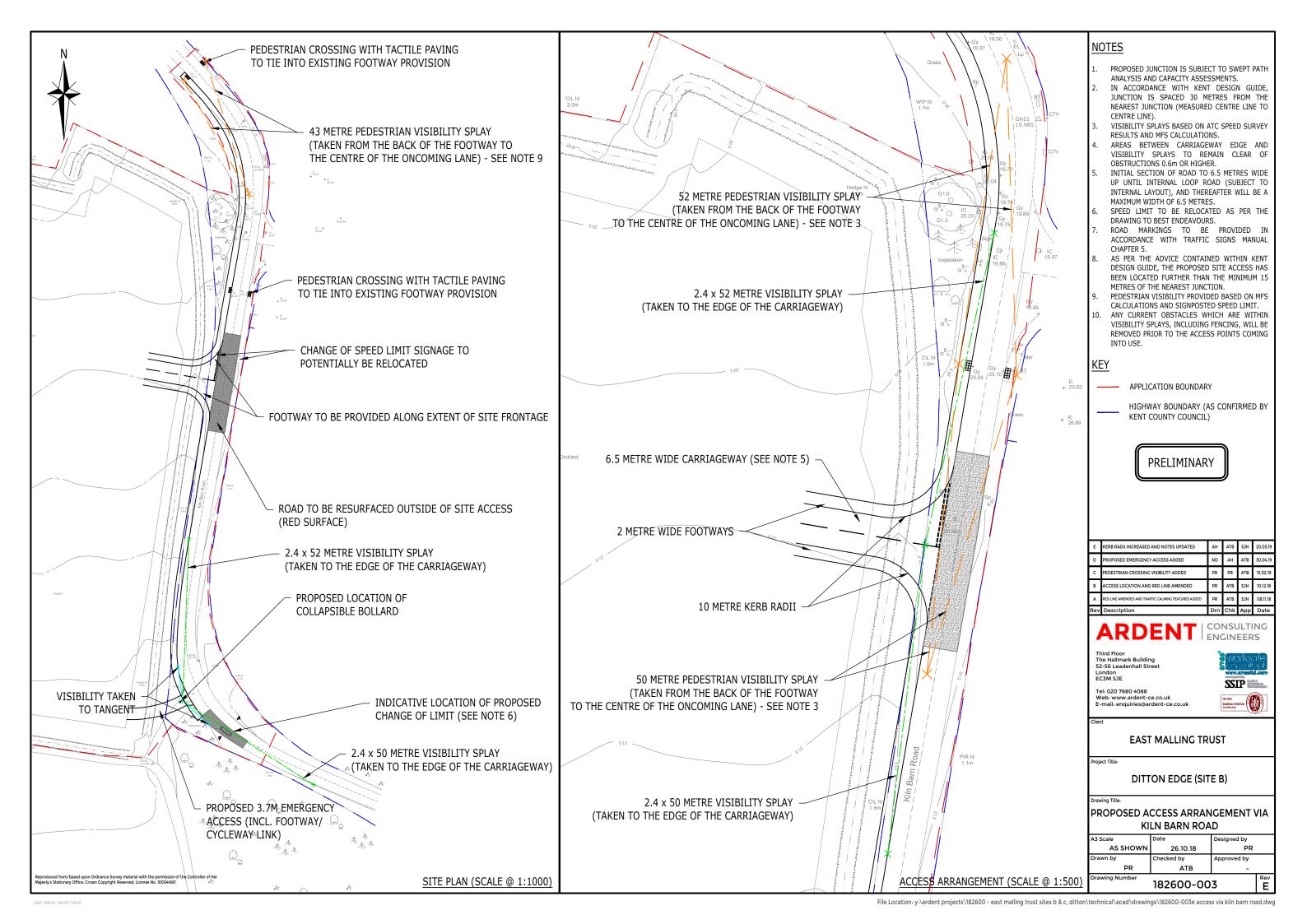
Plate 4: Crashmap Extract showing Bradbourne Lane / St Peter's Road

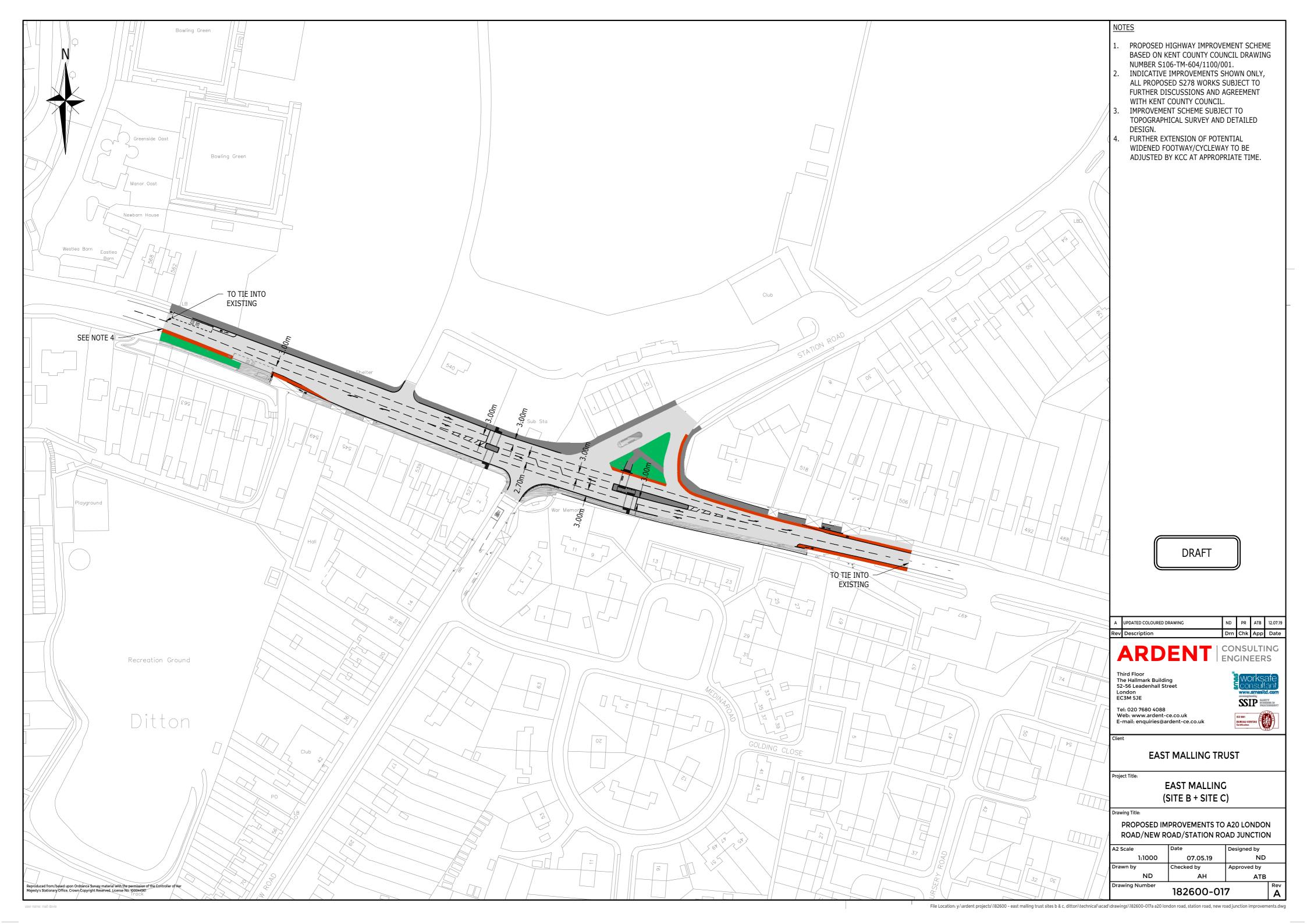
- 3.5.3 Furthermore, in practice it is considered that the proportion of development traffic using this route to travel to/from the west could be further reduced by the proposed S278 junction improvements at the A20/Station Road/New Road signals. By alleviating some of the existing delays at this junction, it is considered that more traffic would be encouraged to stay on Kiln Barn Road and access the A20 by this route instead, thereby minimising impacts on Bradbourne Lane / St Peter's Road.
- 3.5.4 Based on the above details, it is still considered that no mitigating improvements are necessary on Bradbourne Lane / St Peter's Road in light of the proposed development.

4.0 SUMMARY AND CONCLUSIONS

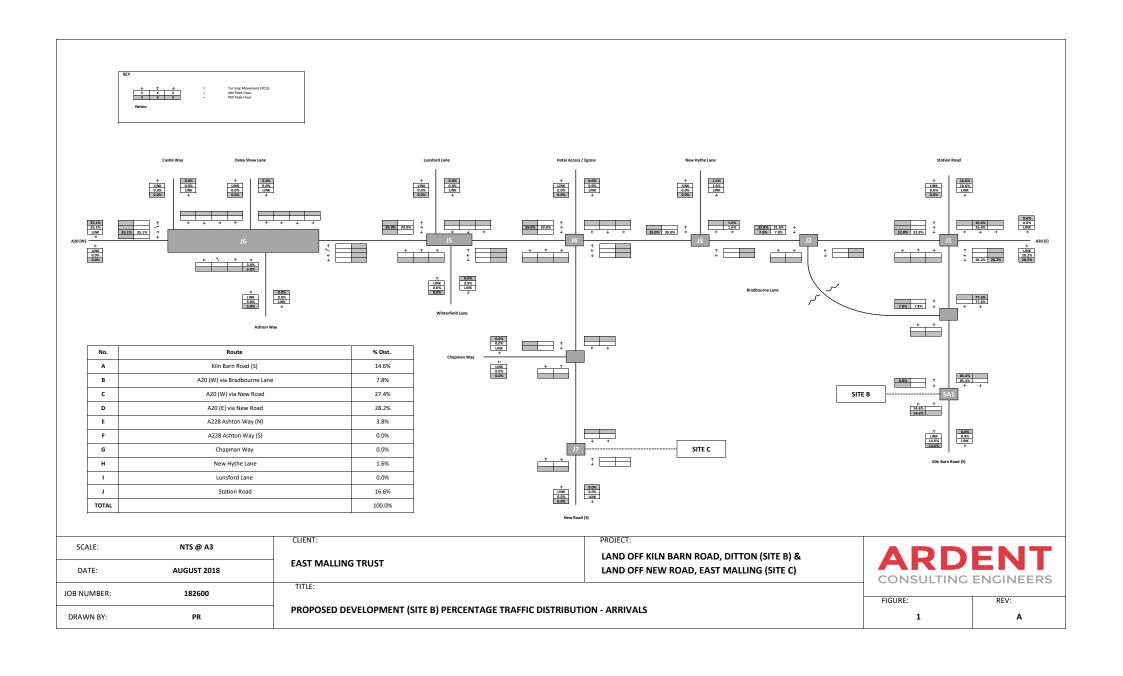
4.1 The purpose of this TAA has been to provide clarity and consolidate all updated details provided to KCC in respect of the highway's considerations regarding the proposed residential development at Ditton Edge. It also addresses outstanding highways and transportation comments raised by KCC in respect of the current outline planning applications at Ditton Edge. It is considered that the details set out in this report are able to satisfactorily address the remaining comments raised by KCC. As such, it is anticipated that KCC should now be able to confirm there are no objections to the current application.

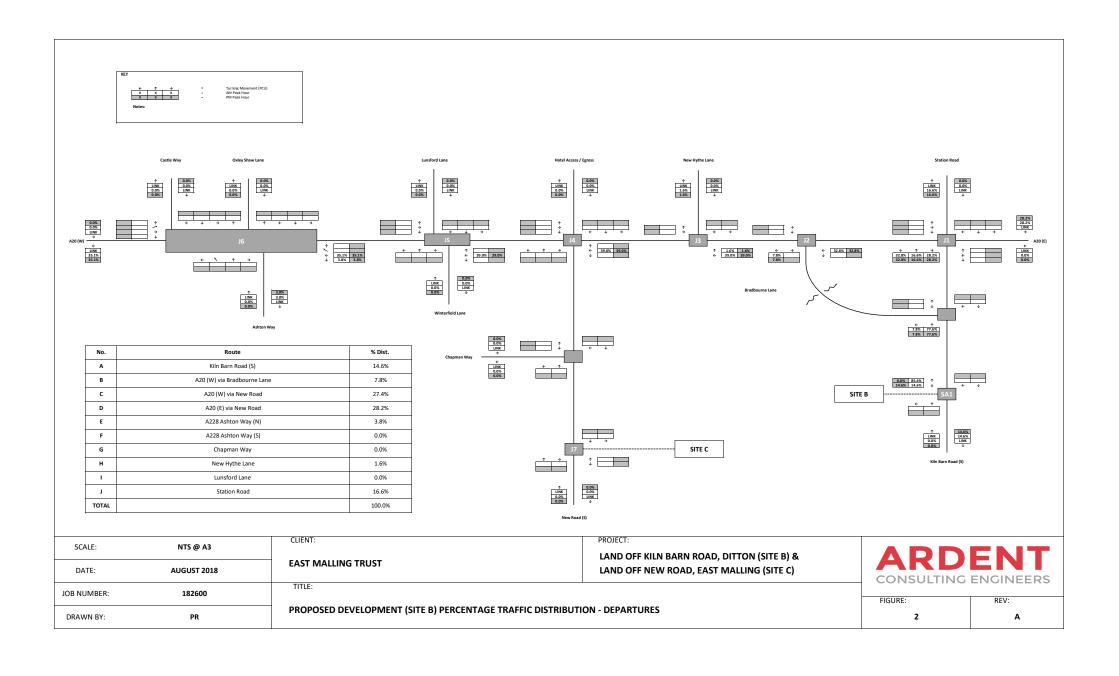
Drawings

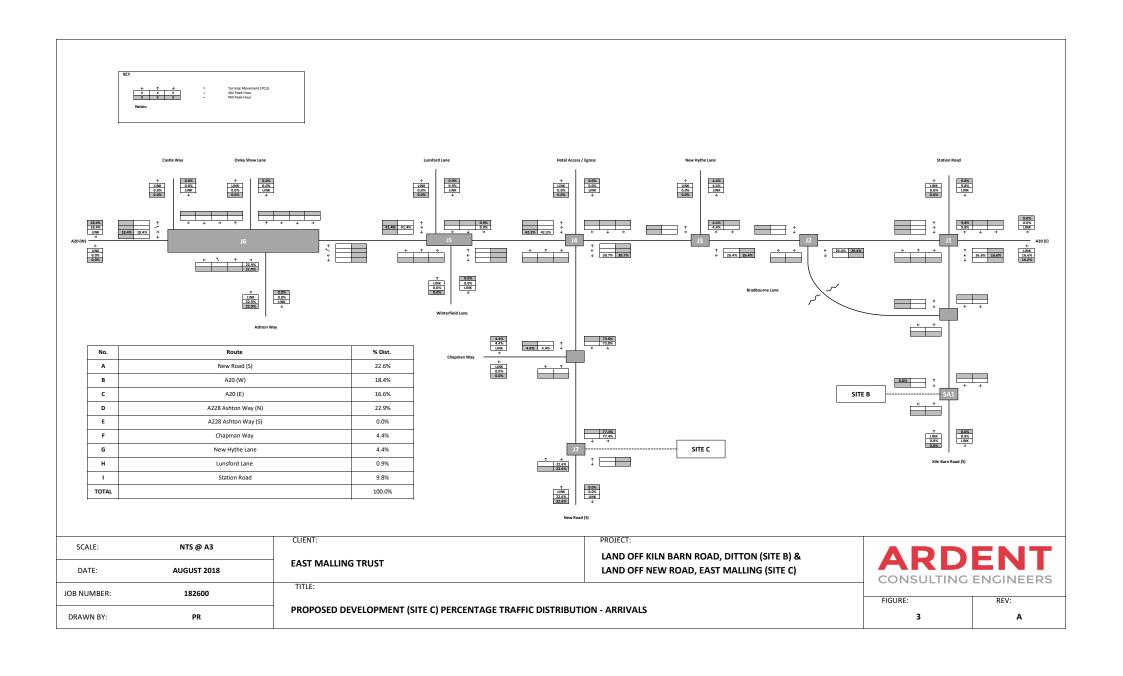


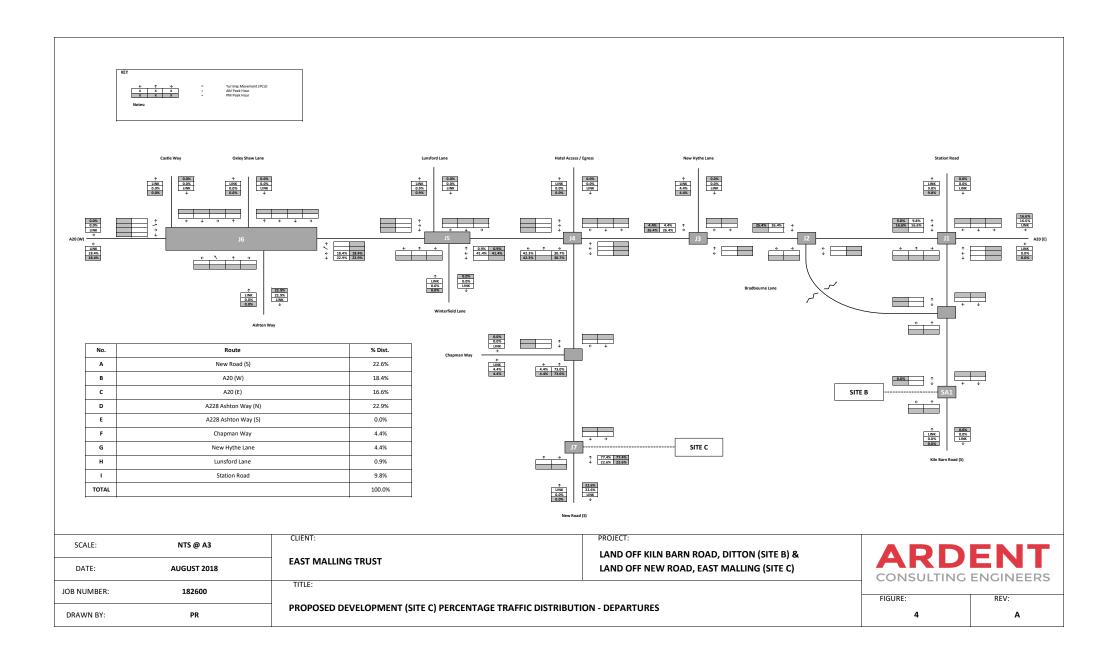


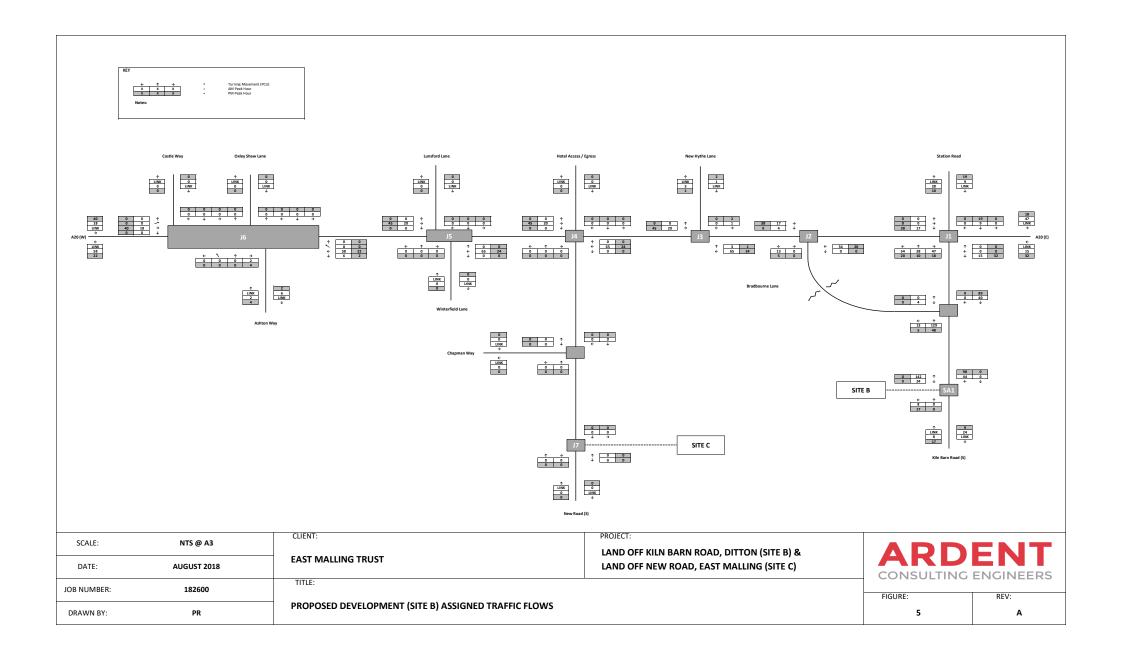
Figures

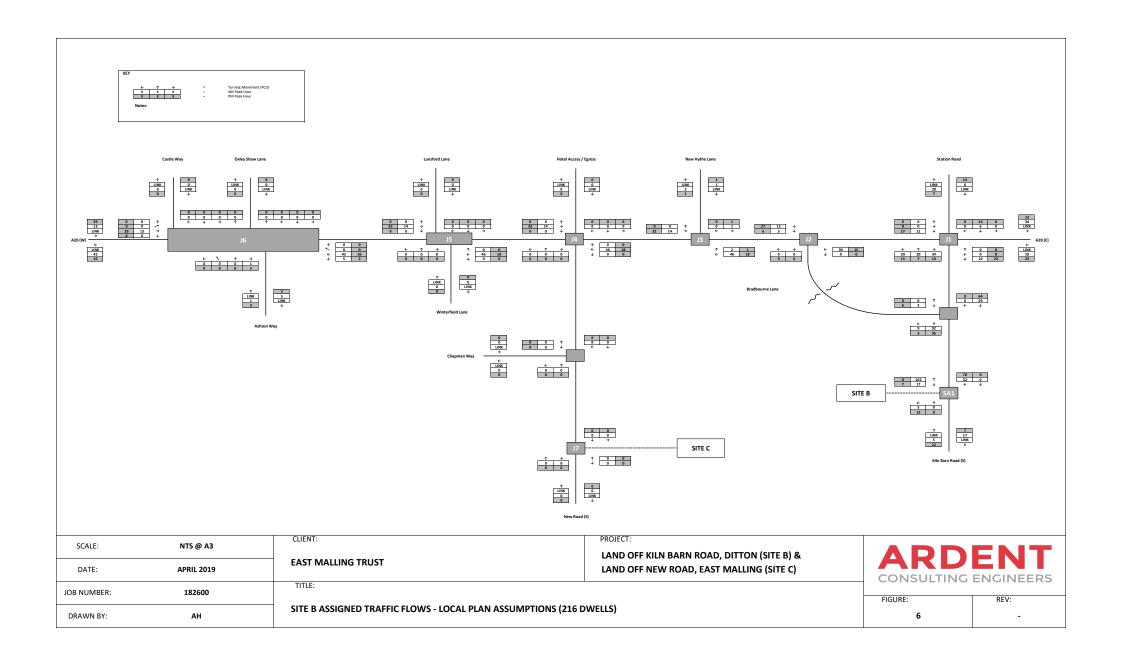


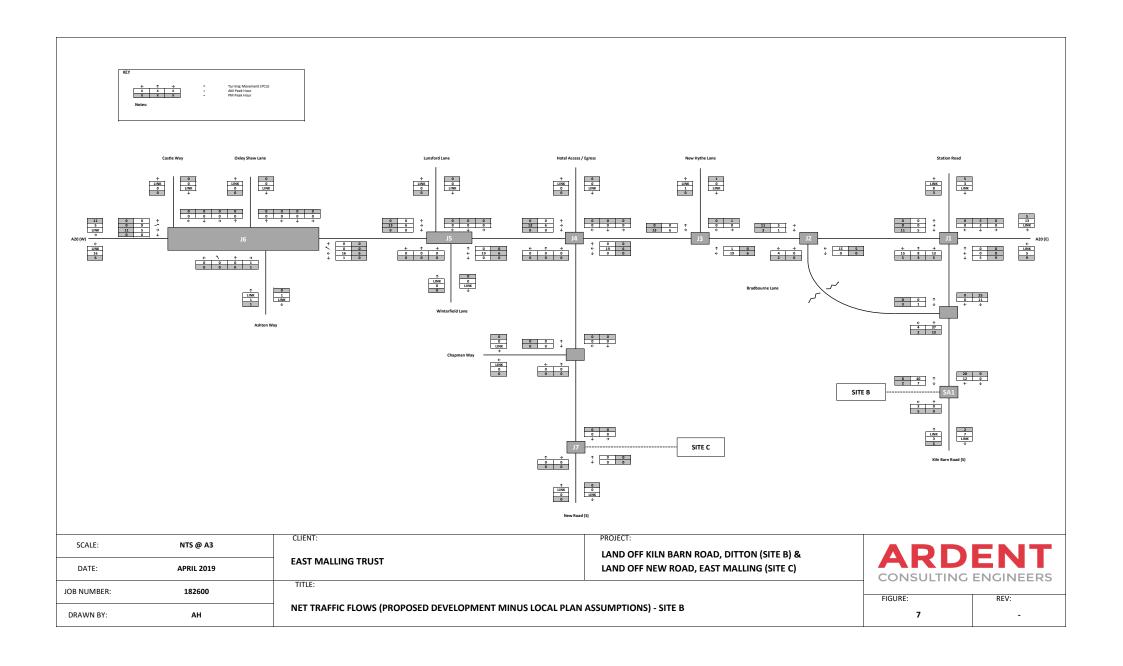


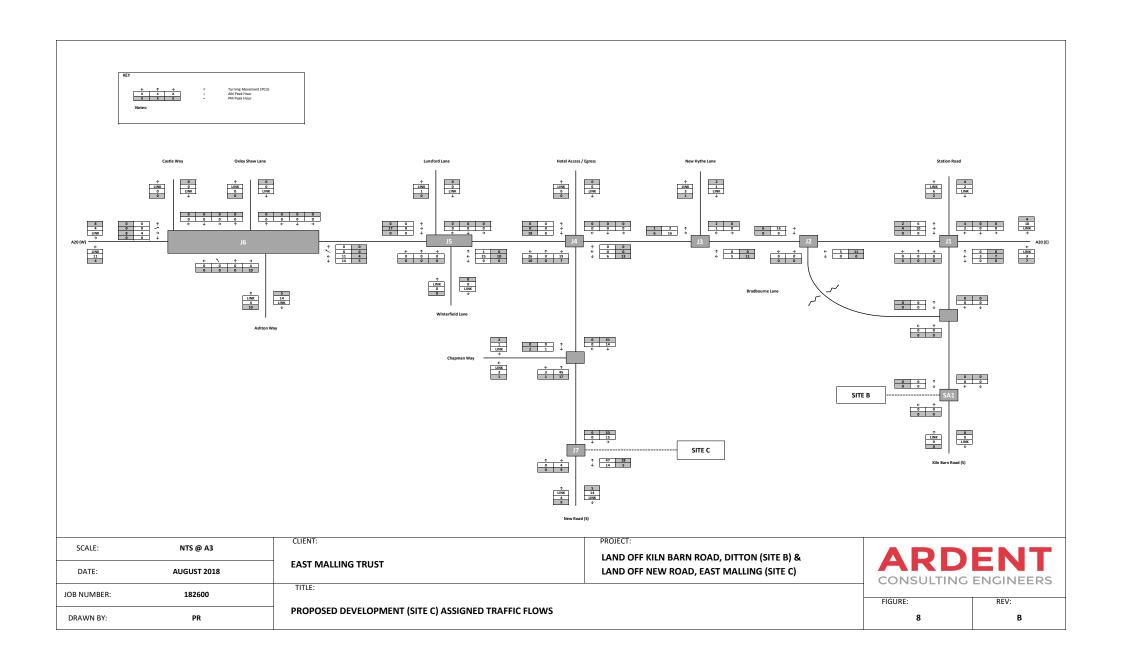


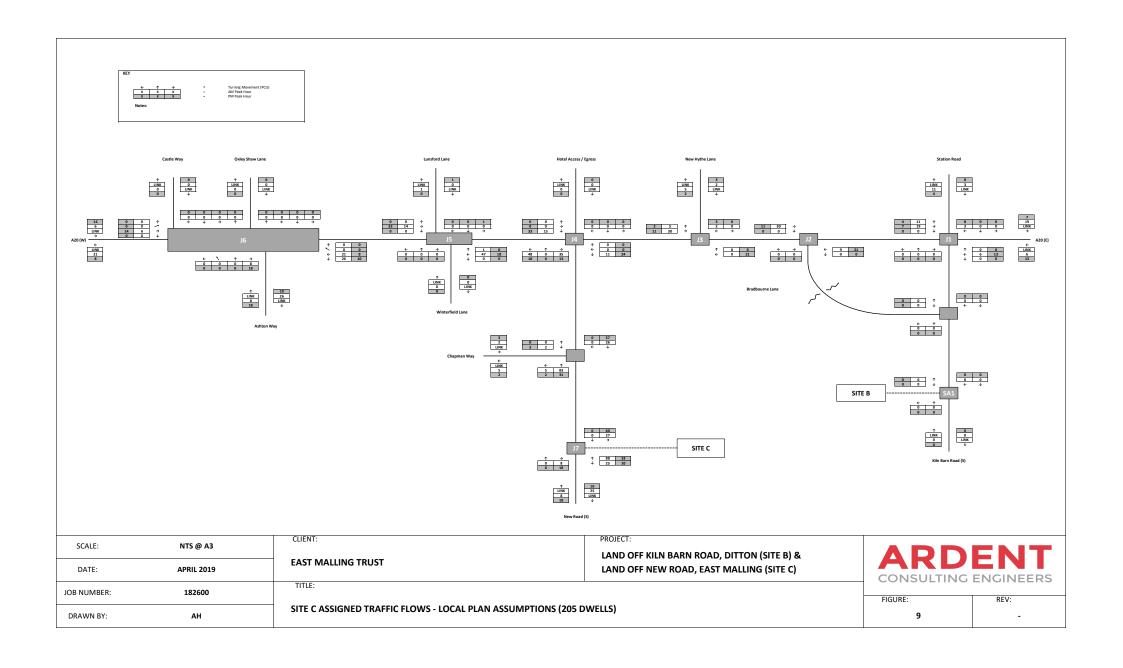


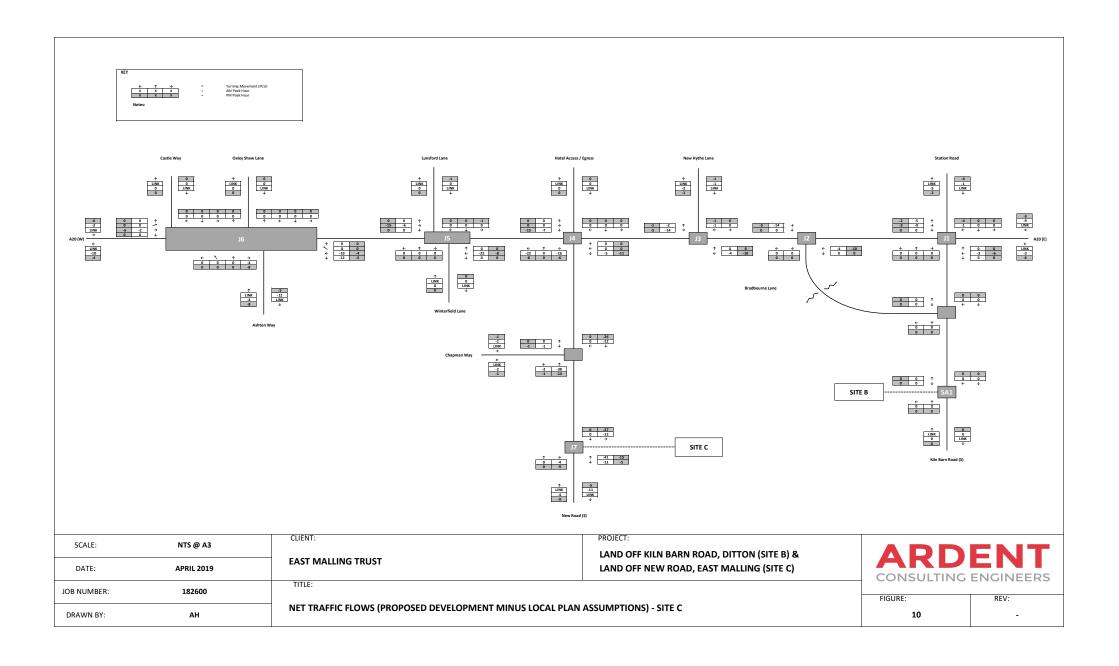


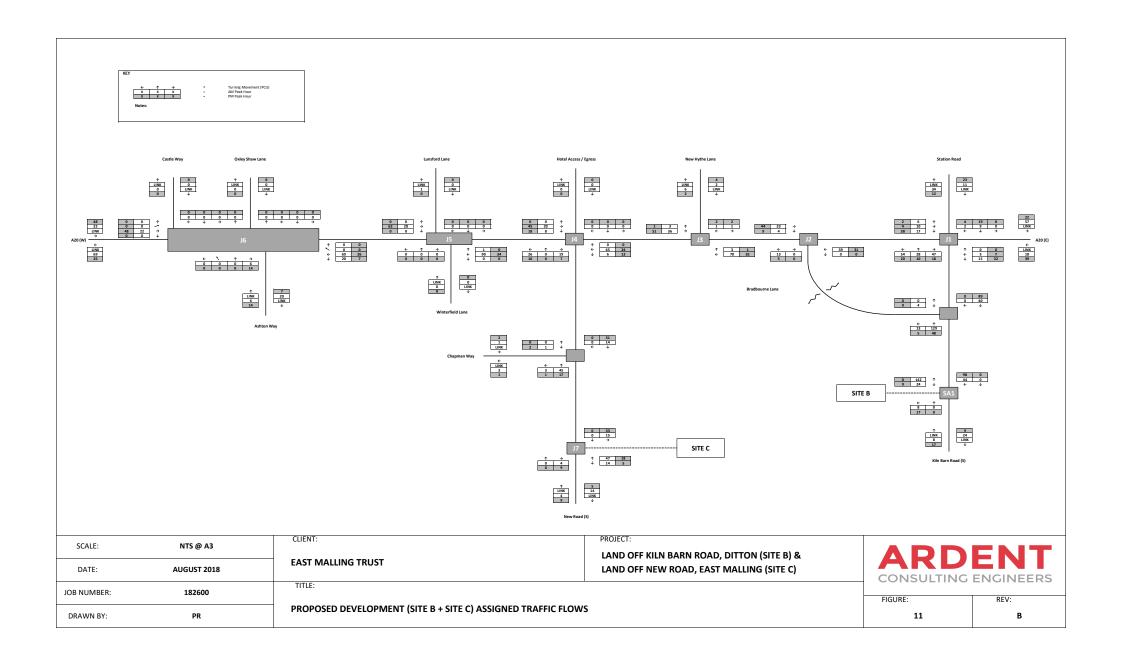


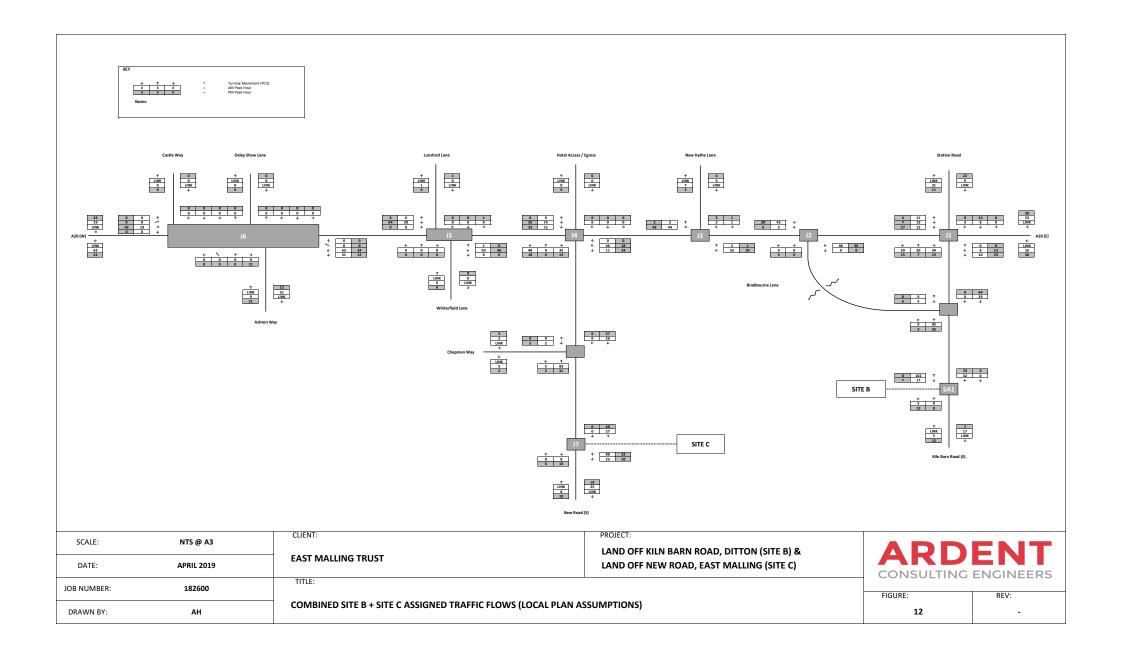


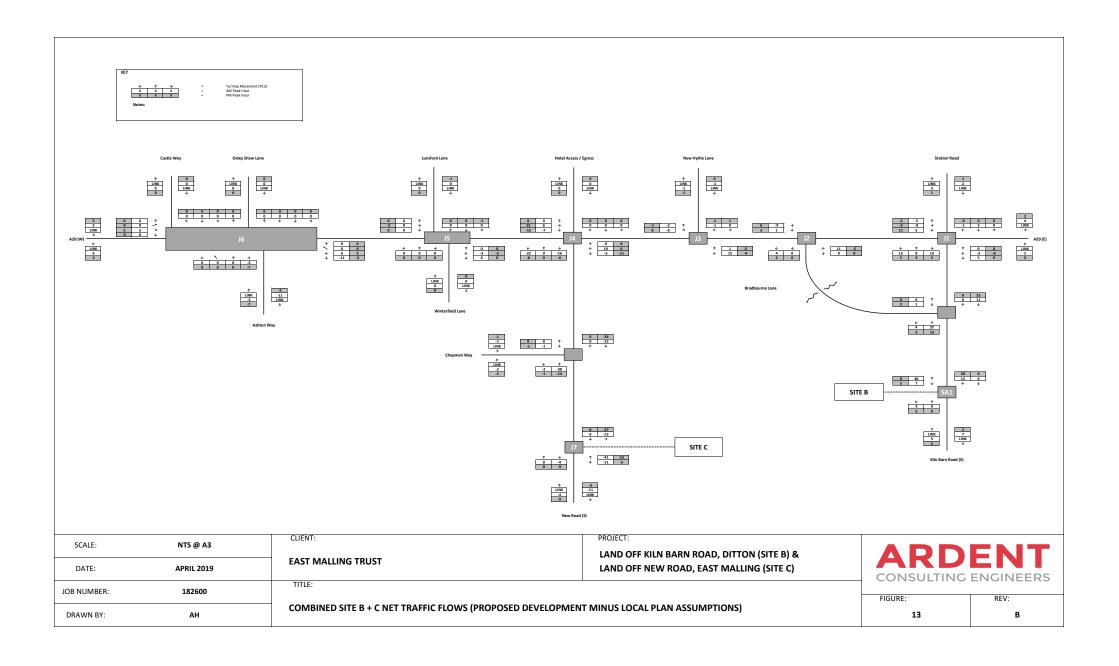


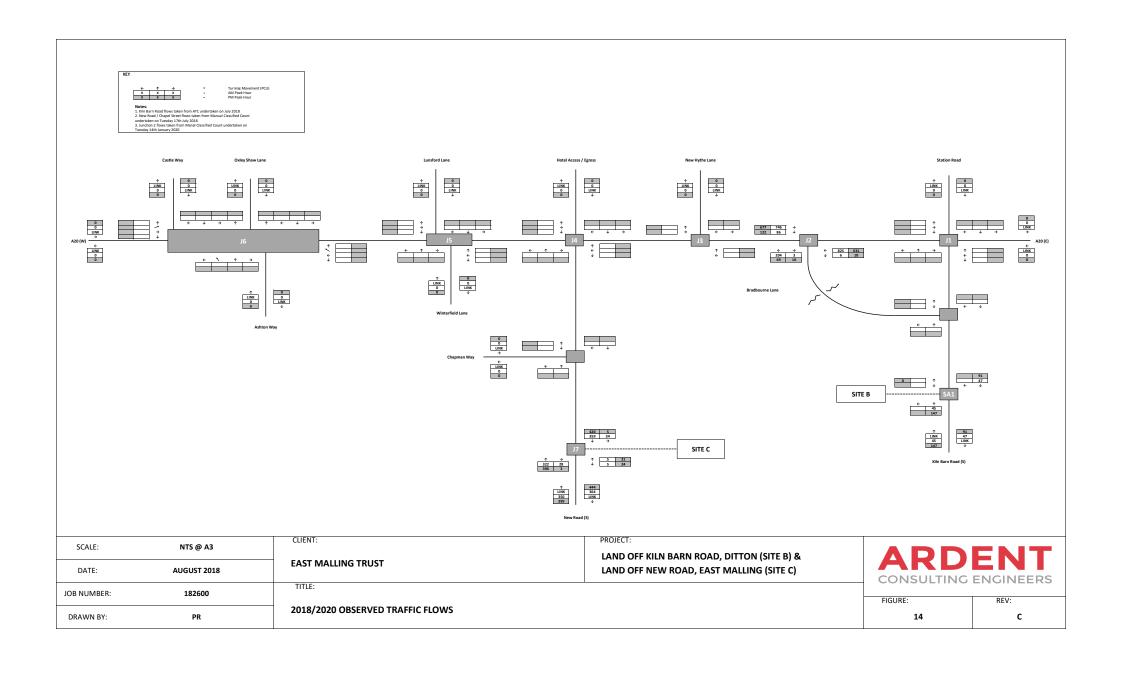


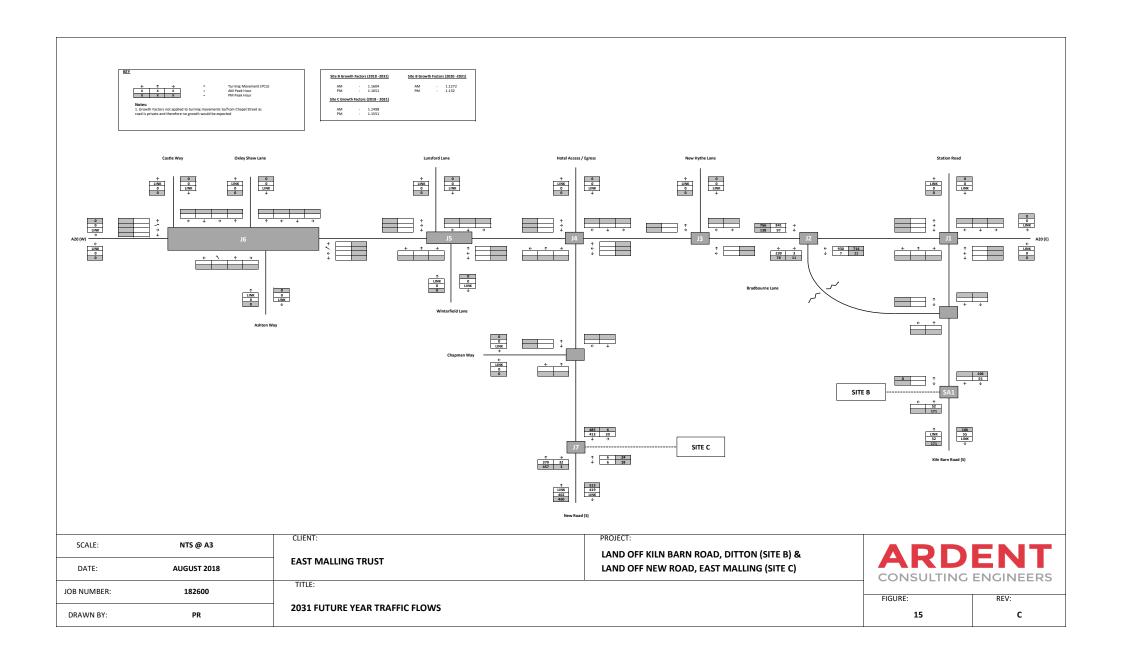


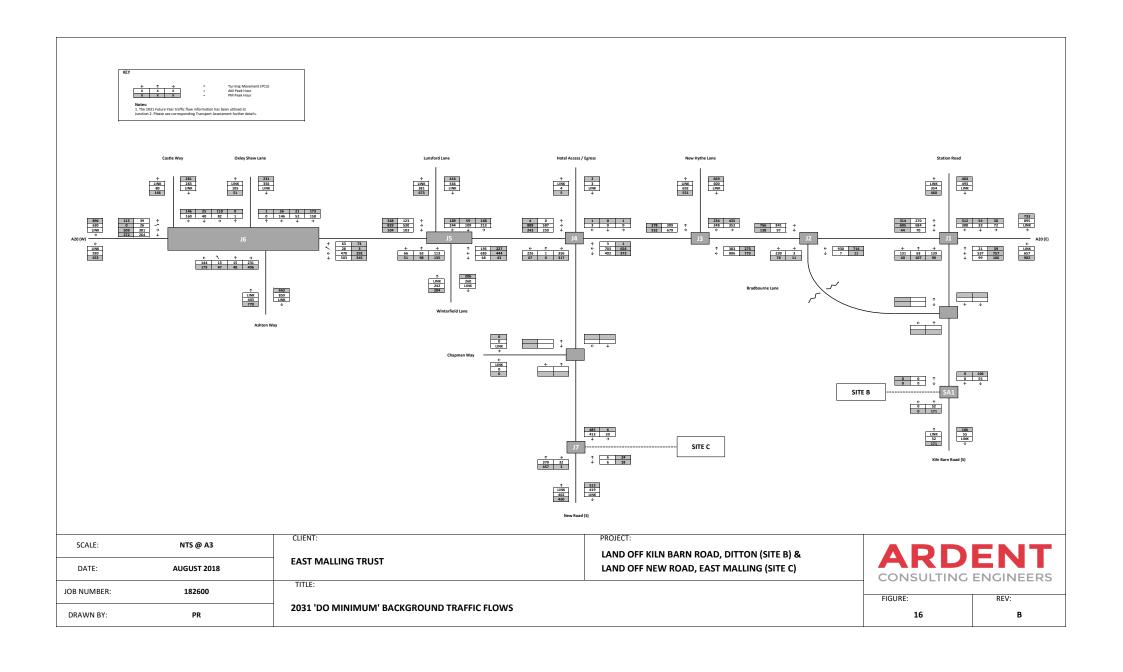


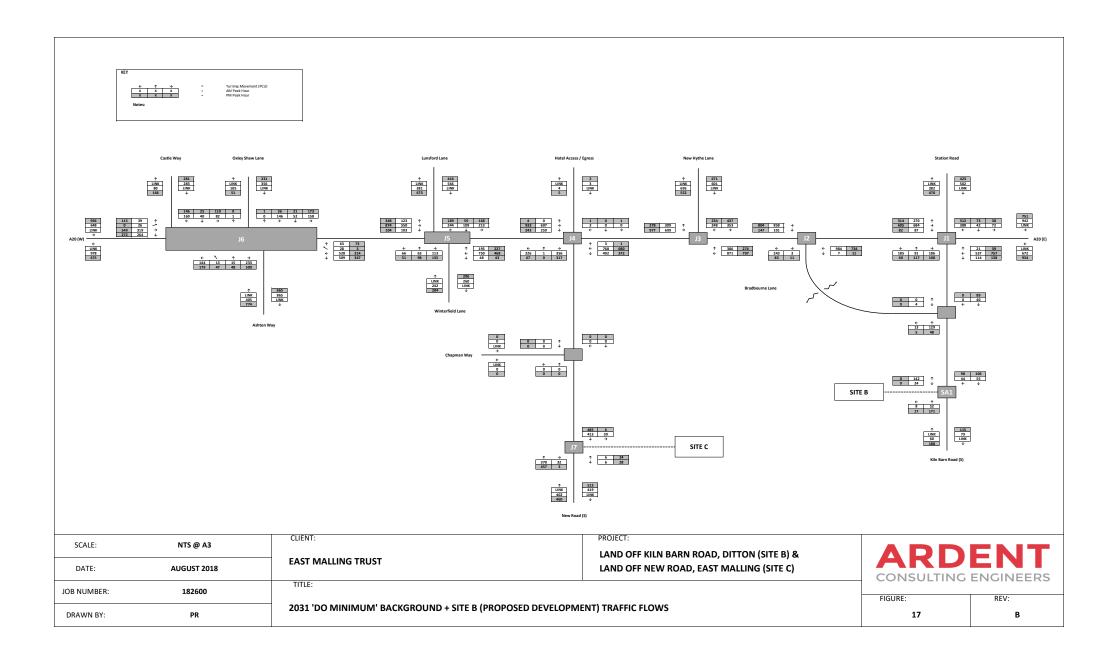


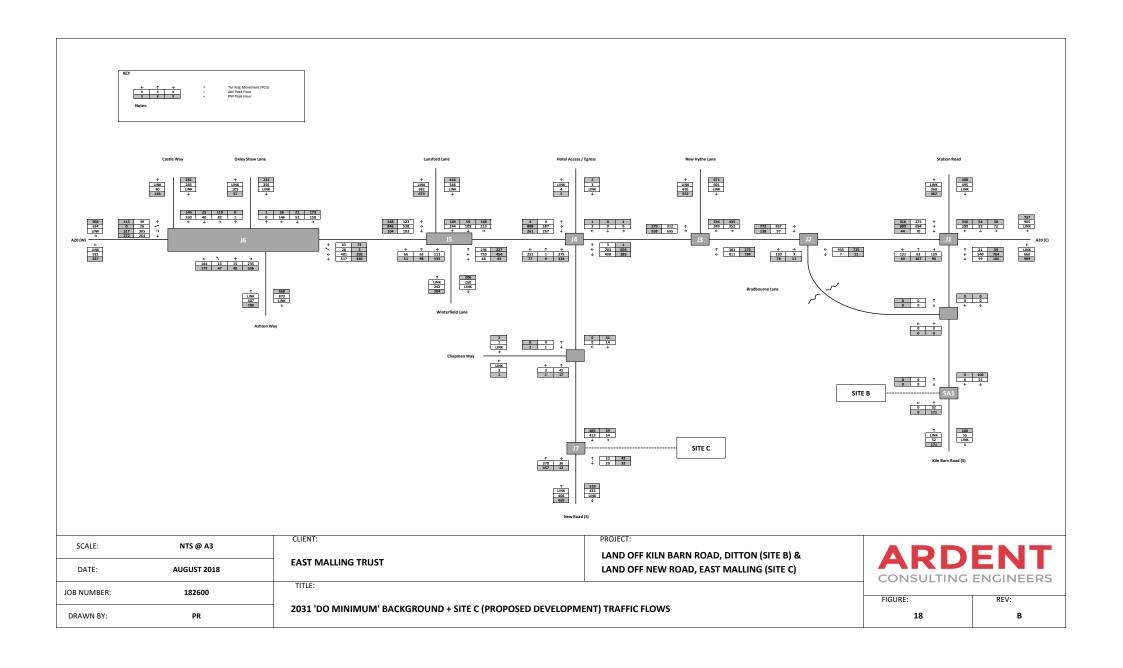


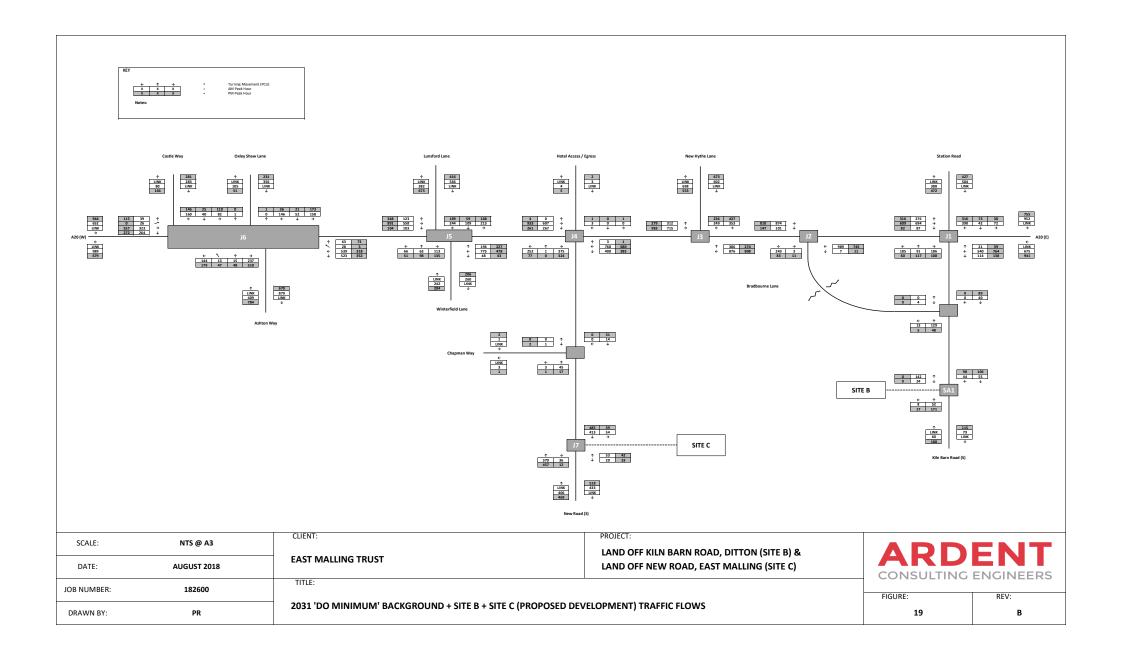


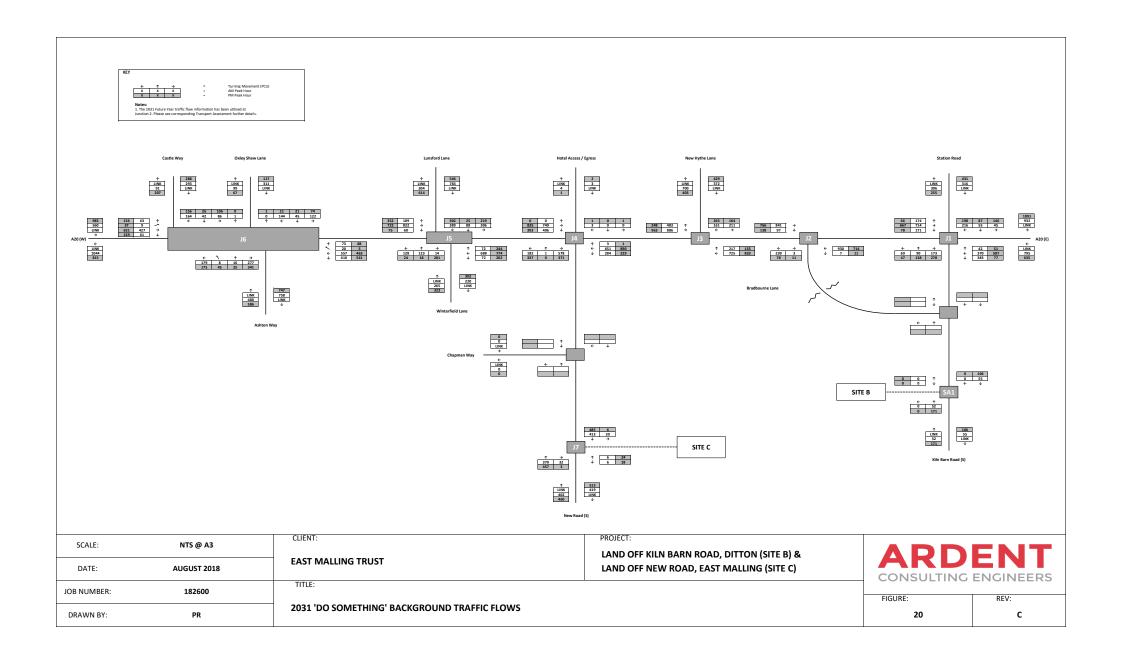


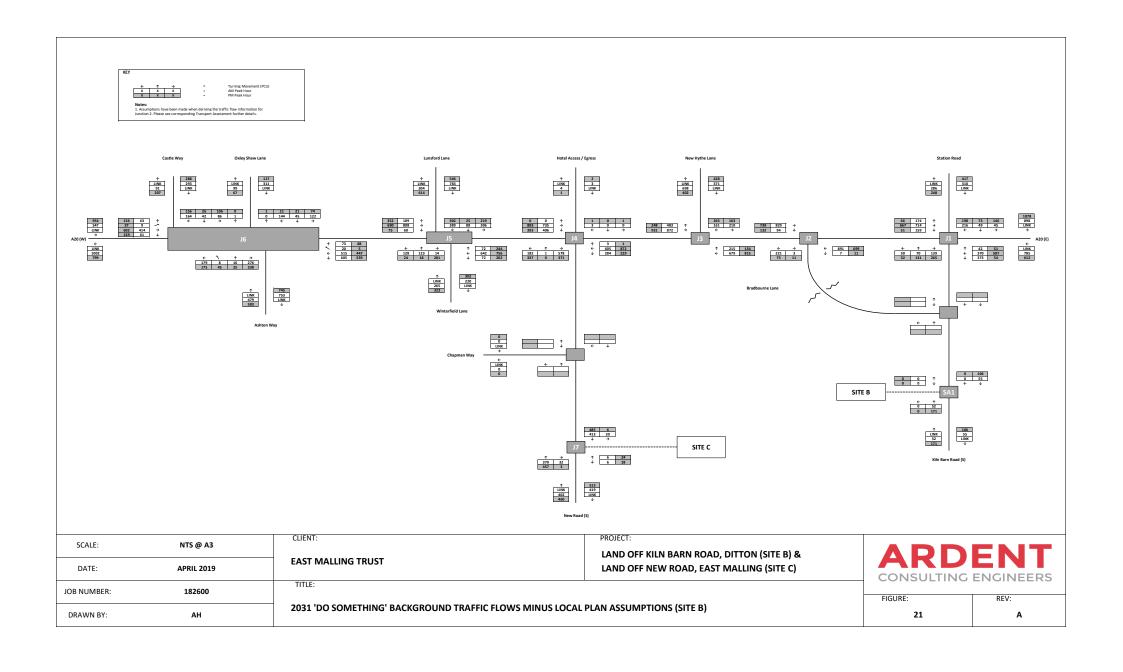


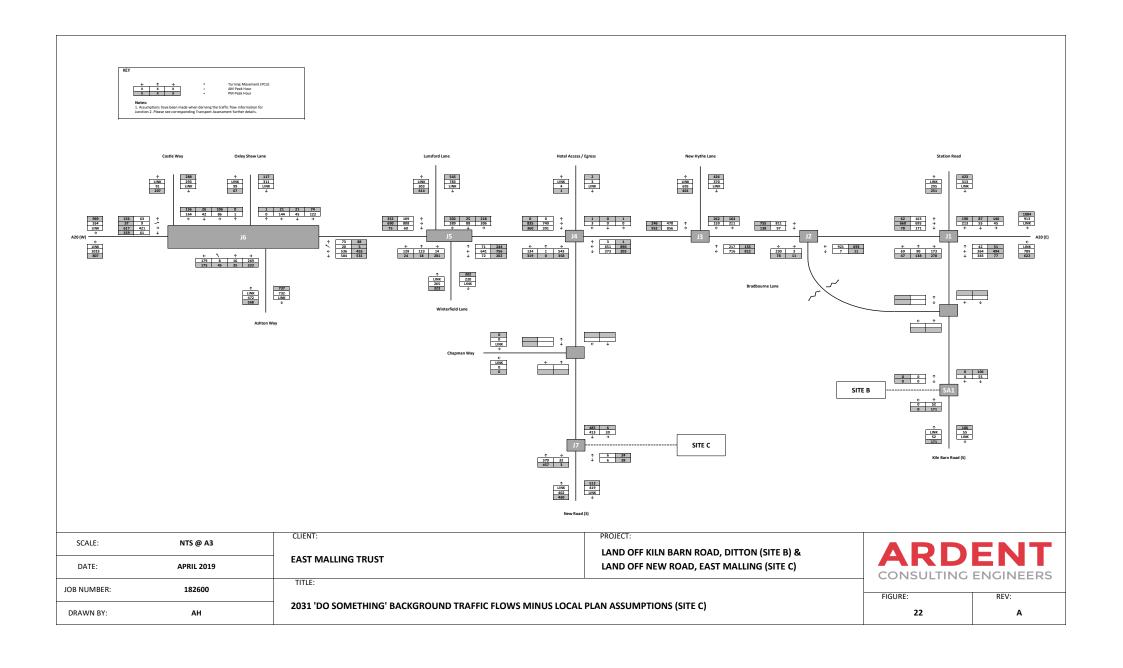


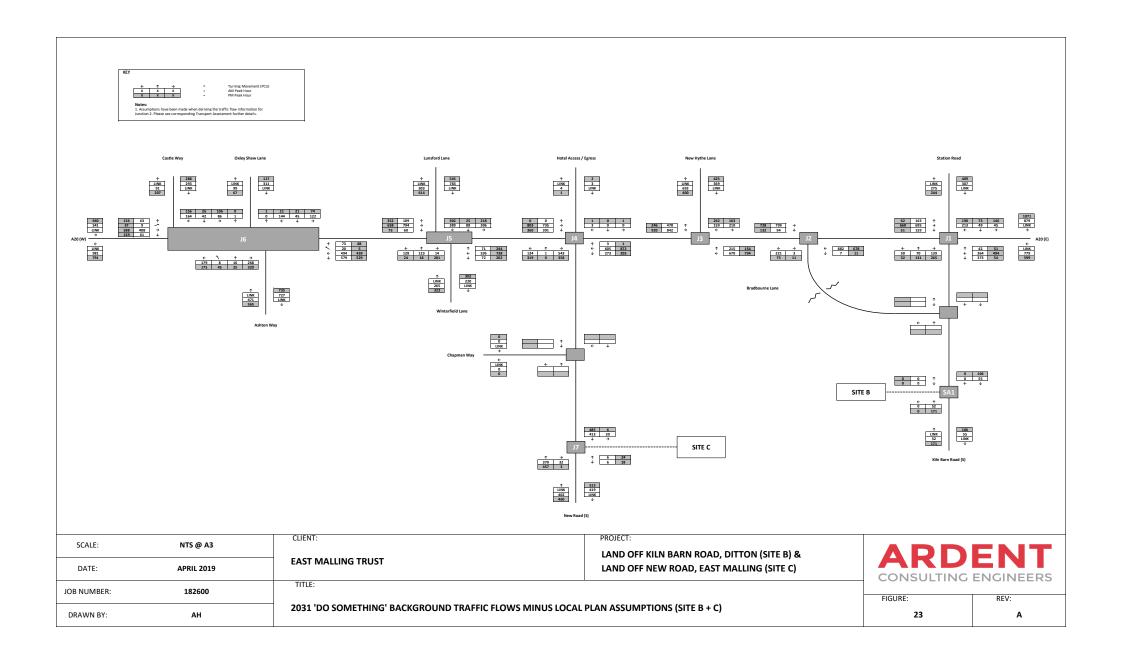


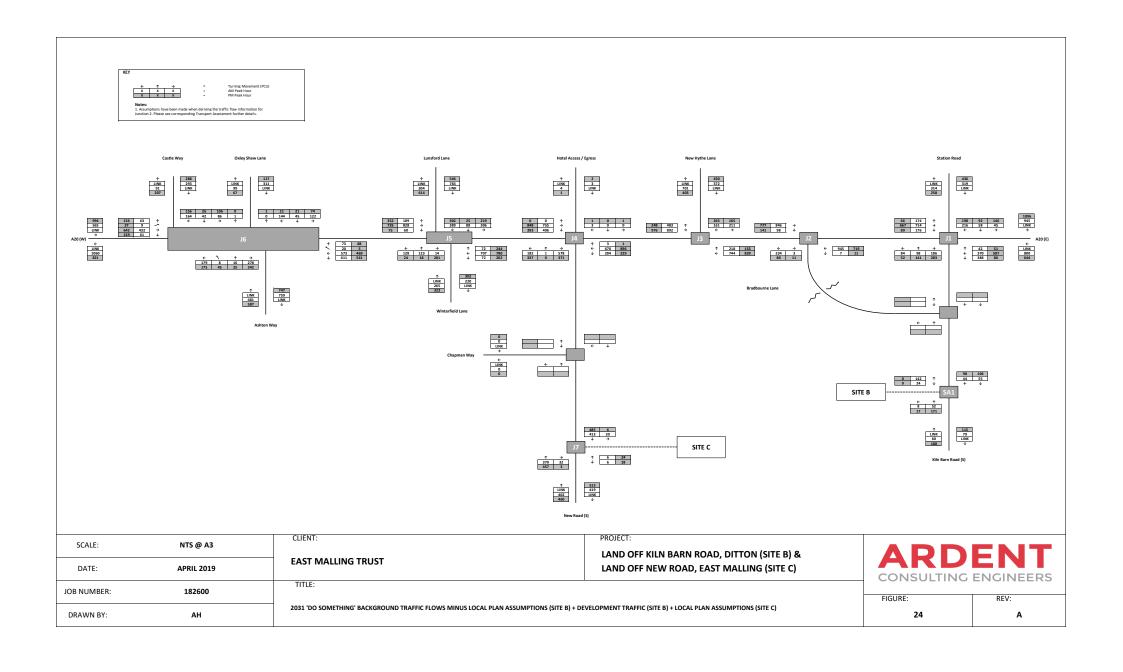


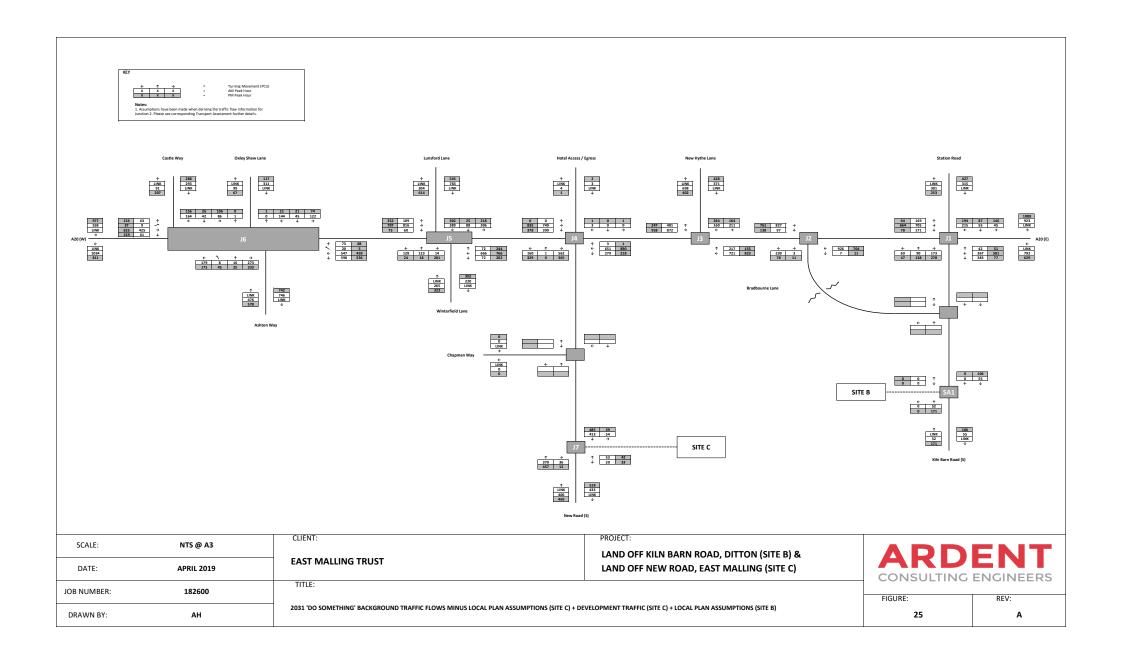


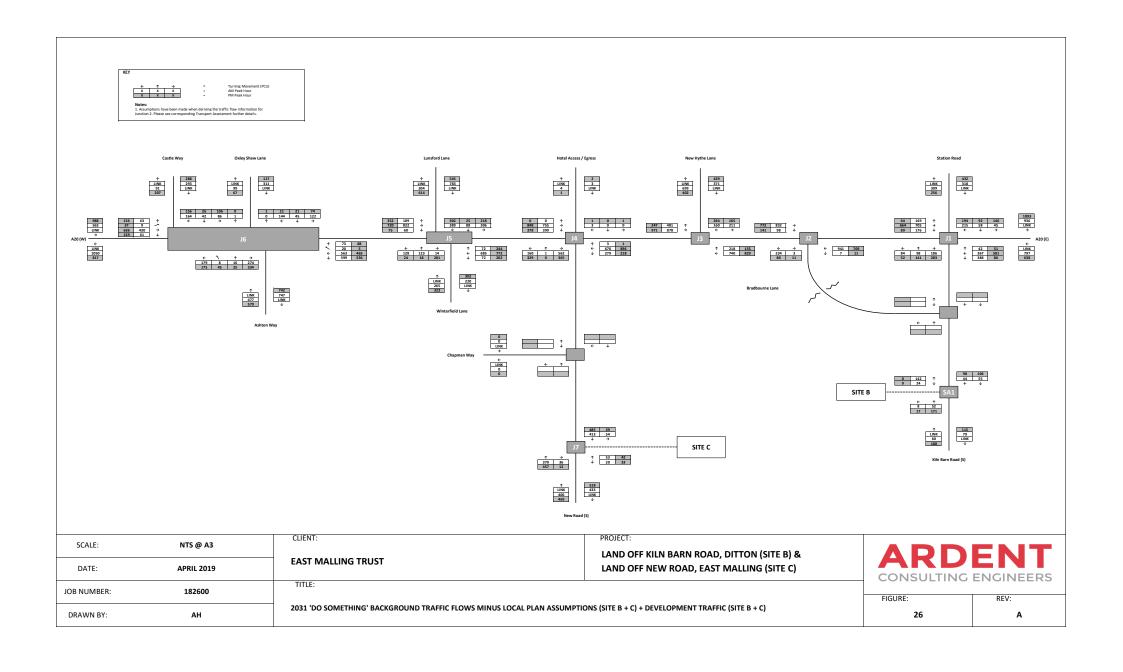












Appendix A Email Correspondence and KCC Comments

Paul Rynton

Subject: FW: East Malling Sites B and C

From: Louise.Rowlands@kent.gov.uk <Louise.Rowlands@kent.gov.uk>

Sent: 18 February 2019 15:34

To: Andrew Braun <abraun@ardent-ce.co.uk>

Cc: GREvans@savills.com; Paul Rynton <prynton@ardent-ce.co.uk>; Terry.Drury@kent.gov.uk;

Maria.Brown@tmbc.gov.uk

Subject: RE: East Malling Sites B and C

Dear Andrew

Thanks for letting me have an initial response to the points raised. My comments are as follows:

- 1. The layout should include horizontal deflection which physically reduces traffic speeds to 20mph. I note and accept that this is an outline design and therefore the layout is not a consideration at this stage.
- 2. I will comment on the visibility for pedestrians once the drawing is received.
- 3. The TRO for the speed limit could be conditioned as suggested.
- 4. I am concerned regarding the use of the tracks to the southwest of the site for emergency access. A development of this size requires an emergency access not just for use by emergency vehicles but also as an alternative access in the event of a blockage of the main access. The emergency access could be an additional pedestrian/cycleway onto either Kiln Barn Road or Brampton Fields with lockable bollards.
- 5. Stage 1 safety audits are required prior to permission being granted.
- 6. The number of pedestrian movements along Kiln Barn Road may not be high but it is important that those who do wish to walk can do so safely and therefore a pedestrian link is required.
- 7. Provision of cycle routes along the PROW would be welcome and I will seek advice from our PROW team.
- 8. Thanks for the explanation regarding the census data which is acceptable but it appears that Area 014 should be 004.
- 9. The results of the turning count at the New Road/St Peters Road junction should be used to inform the distribution of traffic.
- 10. The adjustments to the traffic distribution should be evidence based. Existing traffic flows on Kiln Barn Road are likely to be low therefore the increase arising from this development will constitute a significant impact.
- 11. I appreciate your concern regarding additional assessments to include the latest transport model results. The advice given pre-application was made with the information available at the time. We have received the 'headline results' for the updated Visum work and the report is due to be published within the next couple of weeks. It is sensible for us to consider this information when assessing the impact of your development proposal as your development sites are included in the Local Plan Development Strategy which has now been submitted to the Inspectorate.

It is clear that the development of sites B and C impact the junctions along the A20 and it is agreed that mitigating measures will be required. As you are aware KCC Highways are working on improvement schemes along the route and this includes junction capacity improvements and improvements for cycling. S278 works are required where there is a significant and direct impact and I would expect that to include the junctions of A20/New Road, East Malling and A20/Station Road/New Road, Ditton. S106 contributions will be required to deliver the wider improvement measures along the A20 corridor. The schemes are being developed and a cost estimate is being prepared. Once this is available appropriate contributions can be costed.

I hope that helps but we can discuss further when we meet on Friday.

Kind Regards

Louise Rowlands | Principal Transportation & Development Planner | Kent County Council | Highways,
Transportation and Waste | Ashford Highway Depot | Henwood Industrial Estate, Javelin Way, Ashford, TN24 8AD |
External: 03000 413787 | Mobile: 07595089559 | www.kent.gov.uk|

From: Andrew Braun <abraun@ardent-ce.co.uk>

Sent: 12 February 2019 15:00

To: Rowlands, Louise - GT HTW <Louise.Rowlands@kent.gov.uk>; Drury, Terry - GT HTW <Terry.Drury@kent.gov.uk>

Cc: Gregory Evans <GREvans@savills.com>; Paul Rynton <prynton@ardent-ce.co.uk>

Subject: East Malling Sites B and C

Louise/Terry,

Further to my email to Terry, we have now been passed KCC's consultation comments for Site B. Having now had chance to review the comments, please see below our initial response to the points raised (our responses shown in red). This follows up on our responses already provided on Site C in the email further below. On the subject of Site C, we assume the below addresses the initial queries and it would be good if you could confirm whether KCC have any further comments on Site C?

The intention of these initial responses to try and agree on what extent of extra information is actually required to address KCC's comments, such that the existing concerns can be addressed. We note that this intention is for the applications to be determined at the Planning Committee on 21st March, and as such if you are able to provide a response fairly quickly that should help us to ensure we can provide any extra information required well in advance of this date. I am due to attend the meeting scheduled for 22nd Feb, and so hopefully we can tick of a number of these points in advance of the meeting.

Access

Access to the site is proposed by means of a priority junction onto Kiln Barn Road. Visibility splays from the site access are acceptable. Noted

The internal layout is designed with long straight distributor roads and this is likely to lead to problems of speeding. It is recommended that the layout is amended to a design which includes horizontal deflection which physically reduces traffic speeds to 20mph. Swept paths diagrams are also required. Based on our notes from the pre-app meeting on 23/08/18 KCC had suggested vertical traffic calming would be acceptable, and so the illustrative layout was drawn up with this in mind. In any case, as this is an outline application we assume no further action is required at this stage?

Crossing facilities for pedestrians are shown to the north of the site access, however forward visibility for pedestrians crossing Kiln Barn road, appears to be restricted due to the bend in the carriageway. We will update the drawing to show visibility at the crossings.

The applicant proposes the extension of the 30mph speed limit and this should be pursued subject to agreement with our Schemes Team and Kent Police. A Traffic Regulation Order would be required. We assume that a 'best endeavours' condition for the TRO could be included as part of any decision, noting that the access would still provide sufficient visibility based on measured speeds if it is not possible to reduce the speed limit for any reason.

A development of this scale requires an emergency access in accordance with Kent Design and this can be provided onto Kiln Barn Lane or Brampton Fields. The use of the tracks to the southwest of the site as an alternative emergency access would be subject to approval from emergency services. Kent Fire and Rescue Service have confirmed this is acceptable.

The crash records for the study area have been interrogated and no mitigation measures are required. Noted

A safety audit is required for all proposed work within the highway. Parking is to be provided in accordance with IGN2 for suburban edge/village/rural and this is acceptable. Noted. As per correspondence with Terry prior to the application we understand that any safety audits for the accesses for the two sites can be secured by condition. We assume the same approach can be applied to any off-site mitigation works as well (see comments below).

Accessibility

A footway is required along Kiln Barn Lane to the south linking the development with the public right of way at Cyril West Lane and to the development at Franklin Kidd Lane as it is likely that pedestrian movements will take place between the two residential areas. We have not proposed such as link as our review of likely desire lines for pedestrians and the number of movements suggests that there would not be justification for this link in the context of the proposed development. We can share further information that led us to this conclusion if necessary.

Additionally, a link for pedestrians/cyclists is required to Brampton Fields to the north. This could also be considered for emergency access. A link is proposed here as per the existing PROW, however this will not be used for emergency access.

A cycle route along Kiln Barn Road to the north is not possible but there may be potential for routes along the PROWs and these could also provide a more direct route to the train station. Improvements are likely to be required and our Public Rights of Way team will be able to advise. There may be scope to accommodate cyclists along the existing PROW that extends south from the site, noting that this follows an existing track that could already in theory accommodate cyclists. However, a continuous cycle route to the station along this PROW will not be possible as a section further south past the church falls outside of land under the applicants control.

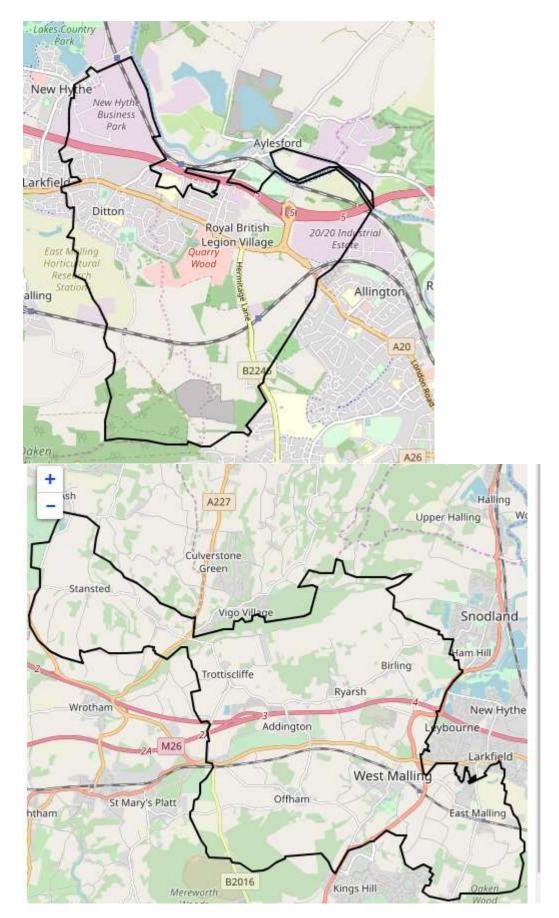
The distance to the nearest bus stop does seem excessive for a development of this size. Noted

A Travel Plan is required together with a monitoring fee of £5000. A Framework Travel Plan has been submitted as part of the application. The monitoring fee is noted and acceptable.

Impact

Traffic generation has been estimated using TRICs which is acceptable. Noted

The modal split has been calculated using census data and this is acceptable but please clarify area 014. Areas 005 and 014 are shown in the maps below – Site B is in 005 and Site C is in 014. Given the significant overlaps between the assessments for the two sites, and to ensure a consistent approach we have used average values across the two sites for modal splits and growth.



A future year assessment for 2031 is acceptable. Noted

Site C is included in the Tonbridge and Malling Middle Super Output Area 004 not 014 as stated in the TA. Please check whether this affects the growth factors used. See comments above.

With regard to paragraph 5.9 it is possible to run the Visum model with the development flows from this proposal but not possible within the timescale required. Noted.

The Visum model is currently being updated to reflect the revised Local Plan development strategy and the Forecast Junction Capacity Assessments will be amended accordingly. It is recommended that information from this work is used to assess the impact of this development proposal. The Visum work will be available in the next week or so and I can let you know when it is available. We note that if timescales/costs were not a factor it would be sensible to use the updated model results, if available. However, as it was agreed pre-application that we could use the previous results it is considered unreasonable to require these updates now the application is in, given this will mean it is likely the March committee would be missed and would also mean additional costs for the applicant. In light of this, we should be grateful if you could agree that the current approach used in the TAs will be acceptable.

I would recommend that the junctions within the study area are reassessed including the information from the revised Visum modelling. See above.

Traffic Distribution and Assignment has been calculated using Census 2011Google Maps for routing. Noted.

The resultant distribution diagram Figs. 1 and 2 indicate that for Site B 14.6% of traffic is likely to travel south on Kiln Barn Road and 85.4% north. It is estimated that of this 85.4%, 44.9% to travel along New Road to the A20 and 32.8% along Bradbourne Lane. I consider that the constraints along Bradbourne Lane will result in a reduced distribution along that route and an increased distribution along New Road. The results of the turning count at the New Road/St Peters Road junction could be used to inform the distribution. We will update the distribution to reduce the level of traffic using Bradbourne Lane. This is also in keeping with the concerns raised by KCC regarding impacts at the A20/Bradbourne Lane junction and my suggestion of a sensitivity test whereby less traffic uses this congested junction.

The increase in traffic arising from the development as shown on Fig.5 is estimated to be:

Ditton Site B	AM Peak (2 way flows)	PM Peak (2 way flows) 26	
Kiln Barn Road south	32		
Kiln Barn Road north	141	53	
Bradbourne Lane	71	58	
New Road, Ditton	110	84	

Site C distribution is shown on Figs 3 and 4 which indicated that 22.6% of traffic from the development is likely to travel to and from the south on New Road and 77.4% to the north.

The increase in traffic arising from the development as shown on Fig.6 is estimated to be:

East Malling Site C	AM Peak (2 way flows)	PM Peak (2 way flows)
New Road north	62	51
New road south	14	18

Off- site impact

As mentioned previously a Visum model has been developed for the A20 corridor and junction capacity assessments have been prepared for the Local Plan evidence using 2031 future year. The Do Minimum scenario includes future growth but no Local Plan development and the Do Something includes the Local Plan development housing and employment allocations and new infrastructure. The Visum model is currently being updated to reflect the revised Local Plan development strategy and the Forecast Junction Capacity Assessments will be amended accordingly. It is recommended that information from this work is used to assess the impact of this development proposal. The Visum work will be available in the next week or so and I can let you know when it is available. See above for comments on this point.

Kiln Barn Road south of the site is particularly narrow with poor forward visibility and not suited to an increase in traffic as is Bradbourne Lane. As noted above we will revise the distribution figures and then reassess the increases on Bradbourne Lane. As for Kiln Barn Road South, the TA shows a maximum of only 32 two-way hourly flows on this route, or circa one movement every 2 minutes on average. Given the former GOTA guidance suggested a starting

point of 30 hourly movements for where significant impacts could occur, and noting there are no apparent safety issues on this route, it is considered that this increase should be acceptable.

A20/Hall Road/Mill Road

The junction is already over capacity and the increase in traffic arising from this development will add to the congestion queues and delays. Improvement proposals are being prepared but are not sufficiently advanced to give any certainty of delivery at the present time. This junction falls outside of the study area agreed with KCC at the pre-application stage (as per emails in July/August 2018), and so it is considered that the proposals should not be required to offer any specific mitigation at this location, noting that the issues here are existing and not likely to be severely exacerbated to a notable degree by the proposals.

A20/Station Road/New Road, Ditton

The junction is already over capacity and the increase in traffic arising from this development will add to the congestion queues and delays. Drawing number 182600-007 shows potential improvements to mitigate the impact however a capacity assessment is not provided and this is required to assess the impact of the scheme. Additionally, a safety audit of the scheme is required. It appears that the LinSIg results for the proposed improvement scheme were omitted from the main TA text by mistake (albeit the results are included in the appendices). We will provide these results in our follow-up response/note. At present these confirm the improvements would be sufficient to offset the impact of the increases, albeit we will need to update and re-check the results following changes to the quantum of traffic that uses Bradbourne Lane. With respect to the safety audit this is noted and we assume this can be conditioned?

I would recommend that the junctions within the study area are reassessed including the information from the revised Visum modelling. See comments above.

A20/Bradbourne Lane

The junction is over capacity in the Do Minimum scenario and the increase in traffic arising from this development will add to the congestion queues and delays.

The capacity assessment for the Do Something scenario shows improved results, however this is reliant on the opening of the Bellingham Way Link which is subject to a potential future planning application at the Aylesford Newsprint site. As the timescale for the delivery of this link is not known, it will be necessary for mitigating measures to be provided by this development to address the capacity issues at this junction. We will re-assess the impacts at this junction following the revised distribution model, and will make conclusions based on the 'do minimum' background flows.

A20/New Hythe Lane

Again, this junction is over capacity in the Do Minimum scenario and the increase in traffic arising from this development will add to the congestion queues and delays.

The developments (Site B and Site C) are expected to generate an additional 114 movements during the AM peak and 92 in the PM peak. This is considered a significant impact. Improvements proposals are being prepared but are not sufficiently advanced to give any certainty of delivery at the present time. The TA sets out that to enact any significant improvements in capacity at this junction, wholesale reconfiguration of the layout will be required, rather than any interim 'tweaks' that would offset the proposed increases. It is considered that as there are existing capacity issues here without the developments in place, it would be unreasonable to expect the applicant to have to make such significant wholesale improvements here, noting that the impacts are not considered severe. There may be scope to agree to a suitable S106 contribution towards any future improvements here, albeit this should not prejudice the development coming forward.

A20/New Road/Hotel

Drawing number 182600-005 has been provided to show a potential scheme to mitigate the impact of the development. A safety audit is required to assess the effects of the scheme. It is assumed the audit can be secured by condition?

A20/Lunsford Lane/Winterfield Lane

Drawing number 182600-006 has been provided to show a potential scheme to mitigate the impact of the development. A safety audit is required to assess the effects of the scheme. It is assumed the audit can be secured by condition?

A20/Ashton Way/Oxley Shaw Lane/Castle Way

The developments are expected to generate and additional 117 movements during the AM peak and 95 in the PM peak. The results of the capacity assessment indicate that there is a detrimental impact. An assessment of the situation using the flows from the revised Visum model would be useful. See above for comments and the use of the new Visum model. The LinSlg model shows this junction would already be over capacity and the effects of the additional movements would only result in negligible changes that are not considered to be severe and would not warrant specific improvements. As with the New Hythe Lane junction, it may be the case that a suitable S106 contribution towards any future improvements KCC may have planned is appropriate.

Kiln Barn Road/Site Access

The results of the capacity assessment indicates that the proposed junction has sufficient capacity for each scenario modelled. Noted

Table 6.7 provides an account of the traffic flows along the local roads. This appears to be incorrect as it doesn't correspond with Fig. 10 which shows the background traffic flows. For instance, Fig 10 indicates the 2031 flows of 216 on Bradbourne Lane in the AM peak and 84 in the PM peak but Table 6.7 states the flow is 358 and 309 respectively. Similar significant discrepancies occur for Kiln Barn Road with Fig. 10 showing flows of 107 in the AM peak and 277 in the PM peak compared to flows of 461 and 536 respectively at Table 6.7. We will reviews and recheck these figures and address any discrepancies if required.

Para. 5.11 states that the turning movements at the A20/Bradbourne Lane junction has been assumed to be 30% of that of the A20/Station Road/New Road junction. A separate traffic turning count is required in order to accurately assess the impact at this junction. See above comments.

Para 2.18 indicates that a peak hour turning count was undertaken at the New Road/St. Peters Road junction so these flows could be used to inform the distribution diagrams. Noted – we will take this into account in our revised distribution calcs.

Based on the above, it is considered that the following additional information needs to be provided to KCC to allow you to update your comments, and we should be grateful if you could respond to confirm this approach is acceptable:

- Update access drawing to show visibility at proposed crossings
- Share further findings in respect of the lack of a need for a footway/footpath to the south of the site along Kiln Barn Road.
- Secure KCC's agreement that use of the updated Visum model results is not necessary in this instance.
- Update traffic distribution to reduce Bradbourne Lane traffic and re-model junctions where applicable (A20/Station Road/New Road and A20/Bradbourne Lane junctions).
- Review/re-check traffic flow figures on local roads.
- Issue another email or short Tech Note to summarise the above points.
- Discuss any outstanding issues at the meeting scheduled for 22nd Feb.

I trust these details are satisfactory for your purposes and look forward to hearing from you in due course. Please feel free to call if you have any queries or wish to discuss any of the above in further detail.

Kind regards

Andrew Braun

Associate



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Highways and Transportation

Ashford Highway Depot 4 Javelin Way Ashford TN24 8AD

Tel: 03000 418181 **Date:** 21 January 2019

Tonbridge & Malling Borough Council

Development Control Gibson Building Gibson Drive Kings Hill West Malling, Kent ME19 4LZ

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 consulting me on this planning application. The applicant has provided a Transport Assessment Ref. 182600-06 dated December 2018 which considers the development of 300 homes on land off Kiln Barn Road at Ditton also known as Site B. The report also considers a development of 110 homes located off New road, East Malling and referred to as Parkside Site C. The TA considers the impact of both developments in isolation and in combination. My comments are as follows:

Access

Access to the site is proposed by means of a priority junction onto Kiln Barn Road. Visibility splays from the site access are acceptable.

The internal layout is designed with long straight distributor roads and this is likely to lead to problems of speeding. It is recommended that the layout is amended to a design which includes horizontal deflection which physically reduces traffic speeds to 20mph. Swept paths diagrams are also required.

Crossing facilities for pedestrians are shown to the north of the site access, however forward visibility for pedestrians crossing Kiln Barn road, appears to be restricted due to the bend in the carriageway.

The applicant proposes the extension of the 30mph speed limit and this should be pursued subject to agreement with our Schemes Team and Kent Police. A Traffic Regulation Order would be required.

A development of this scale requires an emergency access in accordance with Kent Design and this can be provided onto Kiln Barn Lane or Brampton Fields . The use of the tracks to the south

west of the site as an alternative emergency access would be subject to approval from emergency services.

The crash records for the study area have been interrogated and no mitigation measures are required.

A safety audit is required for all proposed work within the highway.

Parking is to be provided in accordance with IGN2 for suburban edge/village/rural and this is acceptable.

Accessibility

A footway is required along Kiln Barn Lane to the south linking the development with the public right of way at Cyril West Lane and to the development at Franklin Kidd Lane as it is likely that pedestrian movements will take place between the two residential areas. Additionally, a link for pedestrians/cyclists is required to Brampton Fields to the north. This could also be considered for emergency access.

A cycle route along Kiln Barn Road to the north is not possible but there may be potential for routes along the PROWs and these could also provide a more direct route to the train station. Improvements are likely to be required and our Public Rights of Way team will be able to advise.

The distance to the nearest bus stop does seem excessive for a development of this size.

A Travel Plan is required together with a monitoring fee of £5000.

Impact

Traffic generation has been estimated using TRICs which is acceptable.

The modal split has been calculated using census data and this is acceptable but please clarify area 014.

A future year assessment for 2031 is acceptable.

Site C is included in the Tonbridge and Malling Middle Super Output Area 004 not 014 as stated in the TA. Please check whether this affects the growth factors used.

With regard to paragraph 5.9 it is possible to run the Visum model with the development flows from this proposal but not possible within the timescale required.

The Visum model is currently being updated to reflect the revised Local Plan development strategy and the Forecast Junction Capacity Assessments will be amended accordingly. It is recommended that information from this work is used to assess the impact of this development proposal. The Visum work will be available in the next week or so and I can let you know when it is available.

I would recommend that the junctions within the study area are reassessed including the information from the revised Visum modelling.

Traffic Distribution and Assignment has been calculated using Census 2011Google Maps for routing.

The resultant distribution diagram Figs. 1 and 2 indicate that for Site B 14.6% of traffic is likely to travel south on Kiln Barn Road and 85.4% north. It is estimated that of this 85.4%, 44.9% to travel along New Road to the A20 and 32.8% along Bradbourne Lane. I consider that the constraints along Bradbourne Lane will result in a reduced distribution along that route and an increased distribution along New Road. The results of the turning count at the New Road/St Peters Road junction could be used to inform the distribution.

The increase in traffic arising from the development as shown on Fig.5 is estimated to be:

Ditton Site B	AM Peak (2 way flows)	PM Peak (2 way flows)
Kiln Barn Road south	32	26
Kiln Barn Road north	141	53
Bradbourne Lane	71	58
New Road, Ditton	110	84

Site C distribution is shown on Figs 3 and 4 which indicated that 22.6% of traffic from the development is likely to travel to and from the south on New Road and 77.4% to the north.

The increase in traffic arising from the development as shown on Fig.6 is estimated to be:

East Malling Site C	AM Peak (2 way flows)	PM Peak (2 way flows)
New Road north	62	51
New road south	14	18

Off- site impact

As mentioned previously a Visum model has been developed for the A20 corridor and junction capacity assessments have been prepared for the Local Plan evidence using 2031 future year. The Do Minimum scenario includes future growth but no Local Plan development and the Do Something includes the Local Plan development housing and employment allocations and new infrastructure. The Visum model is currently being updated to reflect the revised Local Plan development strategy and the Forecast Junction Capacity Assessments will be amended accordingly. It is recommended that information from this work is used to assess the impact of this development proposal. The Visum work will be available in the next week or so and I can let you know when it is available.

Kiln Barn Road south of the site is particularly narrow with poor forward visibility and not suited to an increase in traffic as is Bradbourne Lane.

A20/Hall Road/Mill Road

The junction is already over capacity and the increase in traffic arising from this development will add to the congestion queues and delays. Improvement proposals are being prepared but are not sufficiently advanced to give any certainty of delivery at the present time.

A20/Station Road/New Road, Ditton

The junction is already over capacity and the increase in traffic arising from this development will add to the congestion queues and delays. Drawing number 182600-007 shows potential improvements to mitigate the impact however a capacity assessment is not provided and this is required to assess the impact of the scheme. Additionally, a safety audit of the scheme is required.

I would recommend that the junctions within the study area are reassessed including the information from the revised Visum modelling.

A20/Bradbourne Lane

The junction is over capacity in the Do Minimum scenario and the increase in traffic arising from this development will add to the congestion queues and delays.

The capacity assessment for the Do Something scenario shows improved results, however this is reliant on the opening of the Bellingham Way Link which is subject to a potential future planning application at the Aylesford Newsprint site. As the timescale for the delivery of this link is not known, it will be necessary for mitigating measures to be provided by this development to address the capacity issues at this junction.

A20/New Hythe Lane

Again, this junction is over capacity in the Do Minimum scenario and the increase in traffic arising from this development will add to the congestion queues and delays. The developments (Site B and Site C) are expected to generate an additional 114 movements during the AM peak and 92 in the PM peak. This is considered a significant impact. Improvements proposals are being prepared but are not sufficiently advanced to give any certainty of delivery at the present time.

A20/New Road/Hotel

Drawing number 182600-005 has been provided to show a potential scheme to mitigate the impact of the development. A safety audit is required to assess the effects of the scheme.

A20/Lunsford Lane/Winterfield Lane

Drawing number 182600-006 has been provided to show a potential scheme to mitigate the impact of the development. A safety audit is required to assess the effects of the scheme.

A20/Ashton Way/Oxley Shaw Lane/Castle Way

The developments are expected to generate and additional 117 movements during the AM peak and 95 in the PM peak. The results of the capacity assessment indicate that there is a detrimental impact. An assessment of the situation using the flows from the revised Visum model would be useful.

Kiln Barn Road/Site Access

The results of the capacity assessment indicates that the proposed junction has sufficient capacity for each scenario modelled.

Table 6.7 provides an account of the traffic flows along the local roads. This appears to be incorrect as it doesn't correspond with Fig. 10 which shows the background traffic flows. For instance, Fig 10 indicates the 2031 flows of 216 on Bradbourne Lane in the AM peak and 84 in

the PM peak but Table 6.7 states the flow is 358 and 309 respectively. Similar significant discrepancies occur for Kiln Barn Road with Fig. 10 showing flows of 107 in the AM peak and 277 in the PM peak compared to flows of 461 and 536 respectively at Table 6.7.

Para. 5.11 states that the turning movements at the A20/Bradbourne Lane junction has been assumed to be 30% of that of the A20/Station Road/New Road junction. A separate traffic turning count is required in order to accurately assess the impact at this junction.

Para 2.18 indicates that a peak hour turning count was undertaken at the New Road/St. Peters Road junction so these flows could be used to inform the distribution diagrams.

Conclusion

There are some areas where additional information is required as identified above.

The traffic generated by the development is at a level that would significantly add to existing capacity issues resulting in further delays and queuing on the existing highway network. Although some highway improvements are proposed these do not adequately mitigate the effects of the development.

Until these issues have been adequately addressed I am not able to find the application acceptable.

If your require any clarification on any of the above please let me know.

Kind Regards Louise Rowlands Principal Transport & Development Planner



Highways and Transportation

Ashford Highway Depot 4 Javelin Way Ashford TN24 8AD

Tel: 03000 418181 **Date**: 16 May 2019

Tonbridge & Malling Borough Council

Development Control Gibson Building Gibson Drive Kings Hill West Malling, Kent ME19 4LZ

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	2018 flows	PM Peak (2	2018 flows
	way flows)		way 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	Current Planning
	Allocation	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