



**Swale Borough Council**

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**Highways and Transportation**

Ashford Highway Depot  
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**Tel:** 03000 418181

**Date:** 20 March 2017

**Application - 16/506237/OUT**

**Location - Land South Of London Road, Teynham, Kent ME9 9QJ**

**Proposal - Outline Application for access being sought for development of the site for residential purposes by the provision of up to 120 dwelling houses.**

I refer to the above planning application and would comment as follows:

The application is made in Outline form with all matters, except Access, being reserved. Whilst a layout plan has been submitted with the application, it is appreciated that this should be taken as indicative only, and the Highway Authority will not necessarily be commenting specifically on that layout as the detail is not for consideration. The comments provided below will therefore relate in general to the principle of the proposed development, its access arrangements and the impact on the highway network.

It is noted that the trip generation figures have been derived from driver mode share data applied to person trip rates, for robustness, but we would consider that vehicle trip rates derived directly from the TRICS database would still be appropriate and consistent with the methodology accepted for other development proposals in the locality. The TRICS vehicle trip rates used for comparison purposes in Table 7 of the Transport Assessment are considered adequate for the purposes of the report.

**Site Access Arrangements**

Vehicular access to the development site is proposed from a new junction onto the Lynsted Lane. The form of junction and the geometry is appropriate for the size of the development and the nature of Lynsted Lane, and the proposed sightlines at this junction meet the requirements of the visibility standards. It is noted that the provision of the visibility sight lines would require the regrading of highway land and removal of vegetation, including trees, along the frontage of the site. It is normally expected that any highway trees that are removed must be replaced elsewhere at a ratio of 2 for 1.

As shown on the submitted drawing, the proposed access road into the development would need to be provided as a Major Access Road, in accordance with Kent Design Guide, which is considered appropriate for serving developments of between 50 and 300 dwellings. This provides a 5.5m carriageway width with 1.8m footways both sides to link into the existing footway along Lynsted Lane.

Further footways are shown linking the northeast corner of the site to Lynsted Lane, and towards the western side of the development where links on both the northern and southern sides utilise public footway ZR259. Given the northern link of ZR259 would connect directly to London Road, this section should be provided as a footway/cycleway to give convenient access for cyclists to the highway network and local facilities.

The location of all these footways does suggest that the entire development can be provided with pedestrian access within the 400m walking distance of bus stops serving the main A2 strategic routes, while access to the rural bus services that use Lynsted Lane would require a slightly longer walk from some parts of the development to reach the associated bus stops. However, the walking route to the bus stops and other local facilities for the eastern and southern sides of the development does involve the route along Lynsted Lane. Despite the suggestion within the Transport Assessment that the longer alternative route via the ZR259 link onto London Road could be used, I consider that pedestrians will naturally use the more direct route along Lynsted Lane, where footway provision is absent towards its northern end as it nears London Road.

The prospect of increased pedestrian movement along that section of Lynsted Lane is considered a safety hazard, particularly given that on face value of the Transport Assessment, the development is expected to double the volume of vehicle movements along this section. The proposed off-site highway works shown on drawing 1291/HWY/042 do not appear to provide any noticeable benefit for pedestrians to be able to navigate their way along Lynsted Lane, so would still be forced to walk within the carriageway. As accepted in the submitted Transport Assessment, even the provision of a narrow footway in this area would not be considered particularly safe.

### **Proposed Highway Works**

The development proposes to introduce a new kerbline along Lynsted Lane to formalise the carriageway width and reinforce the built-up nature of its northern section. The suggested narrowing of the carriageway between 4.5m and 4.75m width, which combined with the existing parked vehicles along the section from London Road and the additional queuing associated with increased vehicular activity at this location, is likely to introduce more congestion as two vehicles will struggle to pass one another.

I note the offer to introduce additional traffic calming features in Lynsted Lane to reduce vehicle speeds, but no assessment has been provided to consider the needs for this. Without the inclusion of speed survey data to demonstrate what the existing vehicle speeds are, it is difficult to understand whether there is currently an issue with inappropriate vehicle speeds in the area, and what may be suitable to address this.

It has been acknowledged that existing on-street parking in Lynsted Lane causes issues with forward visibility where the road bends. Given the significant increase in traffic movements described in the Transport Assessment, the developer is willing to fund the implementation of a Traffic Regulation Order (TRO) to address this. In association with the TRO, it is proposed to provide 12 parking spaces within the development site to relieve the parking pressures. However, a TRO would be subject to consultation and it cannot be guaranteed that the process would be successful, meaning that the parking could continue to take place. Considering the distance from the affected stretch of road to the on-site parking area, and the likelihood that it would also be used by residents of the proposed development, the existing parking demand on Lynsted Lane may just be displaced further south, on street.

## **Junction Assessments**

Whilst the traffic modelling has been carried out to growth traffic to 2021 using TEMPRO factors and committed development that was advised during pre-application discussion, there has since been development proposals that are within the emerging Swale Local Plan that would not be counted within the TEMPRO growth. It would be appropriate to include the traffic from the current application sites at Crown Quay Lane and Frogna Lane, both allocated sites within the emerging Local Plan, and therefore valid assumptions towards committed growth. These developments in their own right may need to mitigate against their impact and consider the length of the local plan period, but they would not be required to accommodate the impact from unallocated sites.

Nonetheless, on the face of the modelling provided, it is clear that the development would add queues and delay to the junctions along the A2 corridor at Crown Quay Lane, Murston Road and Swanstree Avenue. The length of these additional queues during the AM peak on the westbound arms of the junctions would be 10, 17 and 17 vehicles respectively, which equates to roughly between 60 and 100 metres. Although it is suggested that the timing of the lights can be amended to optimise the junction performances, it is generally accepted that cycle times beyond 120 seconds should be avoided due to the excessive waiting time for pedestrians and motorists. Whilst the cycle times on some of these junctions are already in excess of this to address existing capacity issues, it would not generally be considered appropriate to increase them even further to mitigate development proposals. Even so, with the adjusted cycle times, the additional queues on the first two aforementioned arms would still be 13 vehicles. It should be expected that such an impact would need to be mitigated, and cannot rely on other developments to provide improvements.

The Transport Assessment describes the difficult circumstances under which the Lynsted Lane junction onto London Road currently operates, with poor visibility, sub-standard geometry and on-street parking inhibiting traffic flows. In order to mitigate against the significant increase in traffic movements through this junction, it has been proposed to signalise the junction, and modelling has been provided to demonstrate the capacity of this. However, no design layout has been submitted to demonstrate that the proposed junction arrangement can be accommodated within the constraints of the land available, including the positioning of signal heads, and again this would require the introduction of new waiting restrictions to keep the junction clear of parked vehicles. Assuming the TRO could be implemented, this may displace vehicles elsewhere onto the highway network, impacting London Road or further south along Lynsted Lane.

Additionally, a signalised junction would cause difficulties in accommodating the delivery vehicles that need to service the shops at this location, as they could not be permitted to stop within the junction. Under the current waiting restrictions, delivery vehicles are permitted to unload directly outside the convenience store, opposite the junction, but this would be within the signalised junction. I have also consulted with my colleagues in the Integrated Traffic Systems team that manage our traffic signals, and they have confirmed that they would not wish to signalise this junction.

## **Conclusion**

It is therefore considered that there is insufficient highway capacity to accommodate the level of development proposed, and the off-site changes proposed by the developer are unacceptable. Furthermore, Lynsted Lane by reason of its restricted width, poor alignment and sub-standard junction with London Road is considered unsuitable to serve as a means of access to the proposed development. Consequently, I would wish to object to the application.

I trust the above comments are of use.

Yours faithfully

**Alun Millard**

Senior Development Planner