Highways and Transportation
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Date: 30 June 2020

Swale Borough Council
Swale House
East Street
Sittingbourne
Kent
ME10 3HT

Application - SW/19/505036/OUT
Location - Land South Of London Road, Teynham, Kent ME9 9QJ
Proposal - Outline application for the erection of up to 86no. residential dwellings, including 50% affordable housing (Access being Sought).

I refer to the amended plans and additional information that has been submitted by the applicant in support of the above planning application following my previous response dated 22nd January 2020, and would comment as follows with respect to highway matters:-

The revised illustrative layout now shown on drawing DHA/12985/03 Revision A would alter the walking isochrone from the development between the proposed houses and the amenity destinations within Teynham, such that the shortest and most convenient pedestrian route would be via the existing public right of way, public footpath ZR259 that links the site directly to London Road. This would overcome my earlier concern about pedestrian traffic associated with the development using the northern end of Lynsted Lane, where no footway is provided. Should the development obtain planning approval, I would wish to ensure that the principle demonstrated in the illustrative layout plan is followed at reserved matters to encourage use of the intended pedestrian route.

However, whilst plans now suggest that the development is unlikely to generate pedestrian traffic through the section of Lynsted Lane lacking a footway to access the amenities along London Road or Station Road, it is still considered that the additional vehicular traffic generated by the development will increase the risk to existing pedestrians using this route.

The proposals do now include a footway along the development site's access road, so that any pedestrians can walk separate from traffic to access the existing footway provision on Lynsted Lane, to connect to local communities along there such as Batteries Close and Lynsted. Notwithstanding the other comments made in this response, the amendment shown to include the footway in the scheme is welcomed.

The applicant has produced a supplementary Technical Note dated February 2020 to respond to the comments that I had provided in my initial consultation response to this application, and a review was undertaken of the trip generation in light of my comments. I had questioned the methodology of using a combination of both privately owned and affordable housing trip rates from TRICS to predict the number of vehicle movements, rather than just selecting privately

owned housing, as the privately owned housing data does already make an assumption that it includes a proportion of affordable housing. Having undertaken a TRICS run using the revised methodology, the applicant has now presented a trip generation for 86 residential units that indicates a total of 44 movements in the AM peak period and 40 in the PM peak. This is an increase of 2 and a reduction of 1 respectively in the AM and PM peak hours from what was suggested previously, and I accept that this would not materially alter the results of any traffic modelling, or how I would have considered the impact previously.

I am therefore satisfied that the trip generation figures presented in the original Transport Assessment can still be used to consider this application, and I note that the amended scheme has also now reduced the number of residential units proposed from 86, down to 84.

The Technical Note has updated the capacity modelling for the A2/Lynsted Lane junction using the latest TEMPro growth rates, to forecast traffic flows for 2024 and the end of the current Local Plan period at 2031. Whilst this does show that in both the 2024 and 2031 scenarios without the development the Lynsted Lane arm of the junction will exceed its capacity in the AM peak hour, the queues would approximately double with the inclusion of the development. The modelling also shows that the development will cause the Lynsted Lane arm to exceed capacity in the PM peak hour at 2031. The technical note suggests that traffic will re-time journeys to avoid peak periods, and drivers on the A2 will likely allow traffic from Lynsted Lane to emerge, so concludes that the modelling exaggerates the likely extent of queueing and delay.

However, my observations and knowledge of the junction do not lead me to agree that this will be the case, as it does not appear to be common practice currently for drivers on the A2 to allow traffic from Lynsted Lane to emerge. This may be due to the delays already experienced along this section of the A2, making it less likely that they will willingly delay their journeys further to allow traffic to emerge, particularly as growth continues and delays will increase. In addition, it has been highlighted to the applicant that there are doubts over the accuracy of the modelling to replicate the existing performance of the junction, as the results do not indicate any queues on the A2 at present that are often evident.

Further information has since been provided to the Highway Authority by the applicant to account for the observations, explaining that local conditions with on-street parking and controlled pedestrian crossings are factors that have impacted this. Whilst it is accepted as the best information available has been used in the modelling, it cannot truly replicate the junction's performance due to these outside influences. Therefore, there are instances when queuing would be expected to be greater due to the platooning of traffic from the pedestrian crossing. It cannot also replicate the issues arising from the parked vehicles on the A2 where again vehicles platoon, making it particularly difficult for right turners out of Lynsted Lane. Additionally, where gaps in Westbound traffic is created, this is generally combined with free-flowing Eastbound flows that will reduce the ability for Lynsted Lane traffic to exit.

In order to address my comments regarding the restricted forward visibility and single file traffic along Lynsted Lane, north of the site access, the applicant has submitted a drawing to propose the introduction of time-limited waiting restrictions along that section. This would ensure the free flow-flow of traffic during the AM and PM peak hours by removing the parked vehicles that currently narrow the road down to single file over that length. However, this would need to displace the parking that exists, and would also be subject to the successful application for a

Traffic Regulation Order, and it is not guaranteed that this will be approved following any objections received from the required public consultation.

For the reasons above, I would therefore recommend that the application be refused on the following highway grounds:

1 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.

2 The existing road network in the vicinity of the site has insufficient capacity to accommodate the material increase in traffic likely to be generated by the proposed development.

3 The proposed development will increase traffic on a highway lacking adequate footways with consequent additional hazards to all users of the road.

I trust the above comments will be considered.

Yours faithfully

Alun Millard
Senior Development Planner