



Ashford Borough Council

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TN23 1PL

Highways and Transportation

Ashford Highway Depot
4 Javelin Way
Ashford
TN24 8AD

Tel: 03000 418181

Date: 23 August 2022

Our Ref: MH

Application - 22/00571/AS

Location - Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent (TN26 1JR)

Proposal - Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

Thank you for the consultation on the Transport Assessment as dated 15th July 2022 on the Ashford Borough Council planning web-site. Unfortunately the scope of the Transport Assessment has not been agreed with Kent County Council Highways and Transportation. A Travel Plan also has still not been submitted to date. I have the following comments on the Transport Assessment:

Local Facilities

The site cannot be considered to be sustainable until Chilmington Green is built out and provides all of the approved facilities such as the District Centre, primary and secondary schools and the various commercial and leisure uses. Until all these facilities are built out travel to key facilities will be outside of the Chilmington Green area and will be by private car due to lack of any formal pedestrian and cycle routes, public transport routes and the excessive distance to Ashford Town Centre. Other nearby villages such as Shadoxhurst and Bethersden do not provide key local facilities and there are no designated footway / cycleways to these villages.

Public Transport

There are currently no bus services serving the Chilmington Green site, and a half-hourly bus service between the site and Ashford Town Centre should have been provided by the developer, Hodson at 100 occupations at Chilmington Green. The existing 2 bus service runs approximately every two hours between Ashford and Tenterden but this is not considered frequent enough to achieve any meaningful modal shift and the existing bus stops are not accessible on foot from the application site as there are no footways along the A28.

Road Safety

Crash data needs to be sourced from KCC's crash data team and not Crashmap as Crashmap is out of date and does not cover the most recent 5 year period.

Development Proposals - Site Access

Stage 1 Road Safety Audits together with Designers Responses have not been undertaken for the proposed access points into the site.

The access point onto Access C Avenue Extension will also require a right hand turn lane as a minimum to prevent right turning traffic backing up to the Access C roundabout.

Vehicle tracking of both access points is required for a 12 metre long bus (not 9.795 metres as currently shown) and a 16.5 metre long articulated vehicle.

The suggested primary road corridor is not compliant with Local Transport Note 1 / 20 in that separated footway / cycleways should be provided adjacent to the primary road.

Trip Generation

The TRICS parameters used to estimate the proposed trip generation from the development are incorrect and should not include the following:

- 1) Suburban area (this site is not considered to be suburban in location)
- 2) Population range of between 125,000 and 250,000 within 5 miles (due to the population characteristics of Ashford)

Traffic Impact

No details have been provided as to when the 2022 traffic surveys took place together with the raw data sheets to validate the submitted spreadsheets and junction modelling results.

An assessment year of 2032 is required (year of application plus 10 years) as this is a strategic site with potential traffic impacts on M20 Junction 9. No details of committed developments have been supplied for the 2032 future assessment year and no TEMPRO growth figures have been provided so KCC are unable to confirm the suitability of the 2032 base traffic figures in the appendices.

Further highway capacity assessments are also required to assess the impact of the development on the local highway network based on the likely traffic flows from the development. This includes the following:

- 1) A28 Great Chart Bypass / Access A Roundabout
- 2) A28 Great Chart Bypass / Ashford Road priority junction
- 3) A28 Great Chart Bypass / Tithe Barn Lane Roundabout
- 4) A28 corridor between the Matalan and Drovers Roundabout (a VISSIM model will be required to assess the impact of the development on journey times and delay with and without the A28 improvement works as these have not been forthcoming to date by the applicant)
- 5) The Avenue / Chilmington Green Road crossroads junction
- 6) A28 Ashford Road / Old Surrender Manor Road priority junction
- 7) Chilmington Green Road / Tally Ho Road priority junction (this will need to take into account the proposed roundabout junction being promoted by the Court Lodge site)
- 8) Chilmington Green Road / Ashford Road, Kingsnorth priority junction (this will need to take into account the proposed staggering of the junction being promoted by the Kingsnorth Green site)

I therefore recommend that this application is refused for the following reasons:

- 1) The proposal, located remote from services, employment opportunities and being unlikely to be well served by public transport, is contrary to the aims of the National Planning Policy

Framework (paragraphs 29 – 41) which seeks to support reductions in green house gas emissions, reduce congestion and minimise journey lengths.

2) The proposed development is likely to generate an increase in pedestrian and cycle traffic on a highway lacking adequate footways and cycleways with consequential additional hazards to all users of the highway.

3) The proposals fails to assess the impact of the development on the local highway network, so it cannot be considered that the development will not result in a severe capacity impact on the local highway network and potential safety implications from increased congestion.

Notes:

No detailed house layout plans have been submitted with this planning application so layout cannot be an approved matter.

Yours Faithfully

Director of Highways & Transportation

*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.