



Tonbridge & Malling Borough Council

Development Control
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ME19 4LZ

Highways and Transportation

Ashford Highway Depot
4 Javelin Way
Ashford
TN24 8AD

Tel: 03000 418181
Date: 4 December 2020

Application - TM/20/02334/FL

Location - Former B And Q Cannon Lane Tonbridge Kent TN9 1PN

Proposal - Variation of condition 1 of planning permission TM/16/00818/FL: to allow the sale of convenience goods from Units 1B and 1C

I refer to the above planning application and whilst I have objections to the current proposals in respect of highway matters it may be possible to overcome those objections if the following amendments to the application are made:-

On appraisal of the Transport Assessment (TA), dated October 2020, prepared for the applicant by Exigo Project Solutions in respect of this application for the redevelopment of two existing non-food retail units to provide a food store.

Trip Generation

The TA states that the removal of the mezzanine floor and hence a reduction in floorspace will lead to a reduction in vehicle trips. Also, I have checked documents relating to application TM/16/0822 in respect of the mezzanine floor and of particular interest is the letter from Exigo dated 13.10.2016 which outlines that 'it is not considered that the additional mezzanine floor area would attract any additional trips, rather extend the period of time customers take to browse in the shop. A mezzanine floor provides more retail floor space for the occupier, therefore not resulting in the same trip rate as the provision of a new retail offer'.

With this in mind I would recommend that a simple comparison is made between the vehicle trip rates for non-food retail and discount food store using appropriate and recent surveys from TRICs and discounting the mezzanine floorspace for both non-food and food store assessments. The use of the trip rates used in both the 2016 assessment for the application site and those used for the Aldi application are dated and in particular, discount food store trip levels have increased significantly in recent years.

This application proposes to use traffic flows from 2013, which formed part of the previous application from 2016, paragraph 2.9 from the Transport Assessment state that volumes have not increased from 2013, the applicant has reviewed a DfT counter on Cannon Lane, to back this statement up, however, on closer inspection, I disagree with the comment. Table 2.5 clearly indicates volumes in 2013 of approximately 18,000, while in 2018, the volume on Cannon Lane has increased to about 22,000, a rise of 22% for the Annual Average Daily Flow (AADF), over five years. Clearly, this increase on the A26 will have an impact on the ingress and egress from the site. As we are currently enduring a pandemic, any new traffic counts are not recommended

as they are unlikely to be representative. However, if the applicant is able to obtain raw traffic data from DfT, to ascertain the hourly split this will help to determine how the 22% is made up throughout the day.

Junction Modelling

The TA states at paragraph 6.32 that 'the proposed development is not predicted to increase traffic generation by a significant level and therefore no modelling is required.' Given that the capacity assessment for the site access, undertaken for the 2016 application, showed the site access to be over capacity, see Table 2.3, with significant queues and delays from the site access, an up to date assessment is required. The capacity assessment should include any proposed scheme mitigation including the proffered two exit lanes from the site access, improved junction mitigation will be a requirement of any planning permission granted.

Also, time period - 11:00-12:00 has been modelled as the peak during a Saturday, but the car park is closest to capacity between 13:00 and 15:00. I would request that the traffic count information from throughout the day is provided, to enable this data to be reviewed, to build a profile of the highway network and ensure that the true peak has profiled for the weekend scenario.

Committed Development

Any committed development scenarios will need to include - Colas Villas, Tonbridge Trade Park on corner of Vale Road and Woodgate Way, and Priory Works development, as recent approvals have been granted on these applications.

Parking

Parking provision requirements as outlined in SPG4 requires a higher level of provision for food retail than non-food retail. The parking requirement should be based on recent TRICs parking accumulation profiles.

Personal Injury Crashes

There have been 8 injury crashes in the 5-year period at the A26 Cannon Lane/Hadlow Road junction. An analysis of the crashes is needed to establish if there are any patterns which can be addressed. Please also provide full details of these crashes.

INFORMATIVE: It is the responsibility of the applicant to ensure, before the development hereby approved is commenced, that all necessary highway approvals and consents where required are obtained and that the limits of highway boundary are clearly established in order to avoid any enforcement action being taken by the Highway Authority.

Across the county there are pieces of land next to private homes and gardens that do not look like roads or pavements but are actually part of the road. This is called 'highway land'. Some of this land is owned by The Kent County Council (KCC) whilst some are owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Information about how to clarify the highway boundary can be found at

<https://www.kent.gov.uk/roads-and-travel/what-we-look-after/highway-land/highway-boundary-enquiries>

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under such legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Yours faithfully

Steven Timson