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Pembury Parish Council,
Lower Green Recreation Ground,
Pembury,
Kent TN2 4DZ
F.A.O. Helen Munro

5th November 2019

Dear Helen,

HENDY'S IN PEMBURY - 19/00884/FL

Further to your email dated 30th October 2019 I have studied the latest information provided by Kent Highways and the applicant's Transport Consultant and have the following comments: -

1. It would appear the Highway Authority is sceptical, as in fact I am, in respect of the predicted trip rates promoted by the consultant and the correlation of the application site with the industry standard "TRICS" database.
2. In light of the uncertainty as to how data within TRICS can be matched against the proposed development and the fact that there are other similar multi car dealership sites run by the applicant, it would be sensible for the applicant to arrange surveys of a similarly sized site owned and operated by them. This would help to explain how such sites operate and would provide more confidence in the predicted traffic generation potential of the proposals.
3. The Consultant has produced further junction analyses based upon surveys carried out in 2018 in respect of traffic growth rates and future years scenarios including up to 2029 as suggested by Highway England.
4. I am surprised the traffic signal-controlled junction of High Street/Tonbridge Road/Pembury Road and Pembury Northern bypass regularly operates with a cycle time exceeding 140 at peak times. As I stated earlier, usually maximum traffic signal cycle time is 120 seconds and anything at or beyond this length of time implies the junction is operating at or over capacity.
5. The vehicle queues that are listed in the vehicle analyses results show that this is the case with traffic queues of up to 150 m extending back from the stop line on Pembury Road toward the site access during the 2018 baseline scenario.
6. Future year analyses show these queues extending to 190m in the 2029 base year and over 210m in the 2029 base year plus development scenario.
7. Whilst the Consultant correctly identifies the increase in traffic queuing at the junction only increases by 4.2 pcu (23m) between the 2029 base and 2029 base plus development scenario the queue is quite extensive.
8. The Consultant then surprisingly goes on to state the two roundabout junctions at the site access and the southern A21 slip road will experience no material impact from the proposed development as the "ARCADY" modelling demonstrates the junctions will operate within capacity in all scenarios.
9. However, the Consultant has failed to see the queue from the traffic signal-controlled junction will extend back to, and beyond the site access junction and therefore its operation will be adversely affected.
10. It is inappropriate in this situation to analyse each of the three junctions in isolation and come to that conclusion as it is evident the effects on the traffic signal controlled junction will impact on the site access and roundabout junction to the south which is clearly evident in the situation which can be observed today.
11. A model incorporating all 3 junctions within a network may provide some useful insight into how the local highway network operates and more closely identify the implications of the

development proposals but it is for the applicant and the Planning Authority to decide to whether to progress this option of analysis.

I therefore maintain my view that Transport Assessment has not correctly identified the existing traffic conditions within the local area and subsequently have not accurately assessed the implications of the proposals on the local highway network.

Yours sincerely

A handwritten signature in black ink, appearing to read 'LH', with a stylized flourish at the end.

Les Henry I.ENG, FIHE, MCIHT
For Les Henry Associates Limited