

# View Comment

## Comment Information

<b>Document Section</b>	<a href="#">Local Plan to 2030 - Publication Draft</a> <a href="#">SITE POLICIES</a> <a href="#">Ashford</a> <a href="#">Urban Area</a> <a href="#">Eureka Park</a> <a href="#">Content</a>
<b>Comment ID</b>	ALP/1043
<b>Respondent</b>	Kennington Community Forum (Christopher Morley)
<b>Response Date</b>	06 Aug 2016
<b>Current Status</b>	Accepted
<b>Do you consider this part of the document is Sound?</b>	No
<b>On which grounds do you consider the document unsound? (if applicable)</b>	Not Effective
<b>Do you consider the Document is Legally Compliant?</b>	Yes

## Comment

The *Traffic Impact Assessment – Summary Report (2016)* which is included in the evidence base of this plan states:

6.1.10 The results of the junction assessments undertaken under these two growth scenarios show that all of the junctions experience capacity problems (the A28 Canterbury Road/ Willesborough Road roundabout junction which experiences only slight capacity problems in the High Growth scenario) in both the High Growth and Core scenarios, and AM and PM peak periods. The two roundabout junctions do experience capacity issues but not as significantly as the signal controlled junctions.

6.1.11 As highlighted previously in the Traffic Growth section, changes in travel behaviours are likely to occur if the junctions remain in their current format. It is likely that drivers would try to find ways to avoid increased congestion, which would therefore provide less of an impact on the junctions in the study. The following bullet points list some of the changes in travel that may occur:

- ▶ Drivers may choose to avoid congested periods at certain junctions by making their journey earlier or later (known as peak spreading);
- ▶ Different route choices may be chosen in order to avoid congested junctions, such as using the new M20 junction 10a to access the Kennington East development;
- ▶ Home working may continue to increase in urban areas;
- ▶ Alternative modes of transport may also become an attractive option rather than continue to pay the increasing costs of the private motor vehicle; and
- ▶ The proposed developments are likely to investigate sustainable transport measures (i.e. better/increased bus services or cycle provision) during the planning process and these may also encourage users outside of the development areas to consider alternative modes of travel.

It is clear that the Kennington area already suffers from traffic congestion, with consequent loss of productivity, noise and exhaust pollution from queuing traffic. Local experience of peak-hour traffic

in Trinity Road and in Canterbury Road south of Penlee Point is that there is significantly more queuing than this report has discovered.

Although this report indicates that "something must be done", it is very difficult to see what in any practical sense could be implemented to avoid significant increase in congestion if large-scale development is permitted. The mitigation factors listed in 6.1.11 are not supported by any evidence that they would be adopted.

No large-scale development should be allocated in this plan until a report identifying practical plans mitigating traffic congestion has been prepared and agreed.

**What changes do you suggest to make the document legally compliant or sound?**

No large-scale development should be allocated in this plan until a report identifying practical plans mitigating traffic congestion has been prepared and agreed.

**Do you consider it necessary to participate at the oral part of the examination?**

Yes

**Does your representation relate to an omission site (a site that has not been included). For example a site for Housing, Employment, Travellers, or Local Green Spaces.**

**Please supply details of the omission site.**

**Attachments**