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Highways and Transportation

Ashford Highway Depot
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Tel: 03000 418181

Date: 21 January 2019

Application - TM/18/02966/OA

Location - Development Site South Of Brampton Field Between Bradbourne Lane And Kiln Barn Road, Ditton, Aylesford, Kent

Proposal - Outline Application: Development of the site to provide up to 300 dwellings (Use Class C3) and provision of new access off Kiln Barn Road. All other matters reserved for future consideration.

Dear Maria

Thank you for consulting me on this planning application. The applicant has provided a Transport Assessment Ref. 182600-06 dated December 2018 which considers the development of 300 homes on land off Kiln Barn Road at Ditton also known as Site B. The report also considers a development of 110 homes located off New road, East Malling and referred to as Parkside Site C. The TA considers the impact of both developments in isolation and in combination. My comments are as follows:

Access

Access to the site is proposed by means of a priority junction onto Kiln Barn Road. Visibility splays from the site access are acceptable.

The internal layout is designed with long straight distributor roads and this is likely to lead to problems of speeding. It is recommended that the layout is amended to a design which includes horizontal deflection which physically reduces traffic speeds to 20mph. Swept paths diagrams are also required.

Crossing facilities for pedestrians are shown to the north of the site access, however forward visibility for pedestrians crossing Kiln Barn road, appears to be restricted due to the bend in the carriageway.

The applicant proposes the extension of the 30mph speed limit and this should be pursued subject to agreement with our Schemes Team and Kent Police. A Traffic Regulation Order would be required.

A development of this scale requires an emergency access in accordance with Kent Design and this can be provided onto Kiln Barn Lane or Brampton Fields . The use of the tracks to the south

west of the site as an alternative emergency access would be subject to approval from emergency services.

The crash records for the study area have been interrogated and no mitigation measures are required.

A safety audit is required for all proposed work within the highway.

Parking is to be provided in accordance with IGN2 for suburban edge/village/rural and this is acceptable.

Accessibility

A footway is required along Kiln Barn Lane to the south linking the development with the public right of way at Cyril West Lane and to the development at Franklin Kidd Lane as it is likely that pedestrian movements will take place between the two residential areas. Additionally, a link for pedestrians/cyclists is required to Brampton Fields to the north. This could also be considered for emergency access.

A cycle route along Kiln Barn Road to the north is not possible but there may be potential for routes along the PROWs and these could also provide a more direct route to the train station. Improvements are likely to be required and our Public Rights of Way team will be able to advise.

The distance to the nearest bus stop does seem excessive for a development of this size.

A Travel Plan is required together with a monitoring fee of £5000.

Impact

Traffic generation has been estimated using TRICs which is acceptable.

The modal split has been calculated using census data and this is acceptable but please clarify area 014.

A future year assessment for 2031 is acceptable.

Site C is included in the Tonbridge and Malling Middle Super Output Area 004 not 014 as stated in the TA. Please check whether this affects the growth factors used.

With regard to paragraph 5.9 it is possible to run the Visum model with the development flows from this proposal but not possible within the timescale required.

The Visum model is currently being updated to reflect the revised Local Plan development strategy and the Forecast Junction Capacity Assessments will be amended accordingly. It is recommended that information from this work is used to assess the impact of this development proposal. The Visum work will be available in the next week or so and I can let you know when it is available.

I would recommend that the junctions within the study area are reassessed including the information from the revised Visum modelling.

Traffic Distribution and Assignment has been calculated using Census 2011 Google Maps for routing.

The resultant distribution diagram Figs. 1 and 2 indicate that for Site B 14.6% of traffic is likely to travel south on Kiln Barn Road and 85.4% north. It is estimated that of this 85.4%, 44.9% to travel along New Road to the A20 and 32.8% along Bradbourne Lane. I consider that the constraints along Bradbourne Lane will result in a reduced distribution along that route and an increased distribution along New Road. The results of the turning count at the New Road/St Peters Road junction could be used to inform the distribution.

The increase in traffic arising from the development as shown on Fig.5 is estimated to be:

Ditton Site B	AM Peak (2 way flows)	PM Peak (2 way flows)
Kiln Barn Road south	32	26
Kiln Barn Road north	141	53
Bradbourne Lane	71	58
New Road, Ditton	110	84

Site C distribution is shown on Figs 3 and 4 which indicated that 22.6% of traffic from the development is likely to travel to and from the south on New Road and 77.4% to the north.

The increase in traffic arising from the development as shown on Fig.6 is estimated to be:

East Malling Site C	AM Peak (2 way flows)	PM Peak (2 way flows)
New Road north	62	51
New road south	14	18

Off- site impact

As mentioned previously a Visum model has been developed for the A20 corridor and junction capacity assessments have been prepared for the Local Plan evidence using 2031 future year. The Do Minimum scenario includes future growth but no Local Plan development and the Do Something includes the Local Plan development housing and employment allocations and new infrastructure. The Visum model is currently being updated to reflect the revised Local Plan development strategy and the Forecast Junction Capacity Assessments will be amended accordingly. It is recommended that information from this work is used to assess the impact of this development proposal. The Visum work will be available in the next week or so and I can let you know when it is available.

Kiln Barn Road south of the site is particularly narrow with poor forward visibility and not suited to an increase in traffic as is Bradbourne Lane.

A20/Hall Road/Mill Road

The junction is already over capacity and the increase in traffic arising from this development will add to the congestion queues and delays. Improvement proposals are being prepared but are not sufficiently advanced to give any certainty of delivery at the present time.

A20/Station Road/New Road, Ditton

The junction is already over capacity and the increase in traffic arising from this development will add to the congestion queues and delays. Drawing number 182600-007 shows potential improvements to mitigate the impact however a capacity assessment is not provided and this is required to assess the impact of the scheme. Additionally, a safety audit of the scheme is required.

I would recommend that the junctions within the study area are reassessed including the information from the revised Visum modelling.

A20/Bradbourne Lane

The junction is over capacity in the Do Minimum scenario and the increase in traffic arising from this development will add to the congestion queues and delays.

The capacity assessment for the Do Something scenario shows improved results, however this is reliant on the opening of the Bellingham Way Link which is subject to a potential future planning application at the Aylesford Newsprint site. As the timescale for the delivery of this link is not known, it will be necessary for mitigating measures to be provided by this development to address the capacity issues at this junction.

A20/New Hythe Lane

Again, this junction is over capacity in the Do Minimum scenario and the increase in traffic arising from this development will add to the congestion queues and delays.

The developments (Site B and Site C) are expected to generate an additional 114 movements during the AM peak and 92 in the PM peak. This is considered a significant impact.

Improvements proposals are being prepared but are not sufficiently advanced to give any certainty of delivery at the present time.

A20/New Road/Hotel

Drawing number 182600-005 has been provided to show a potential scheme to mitigate the impact of the development. A safety audit is required to assess the effects of the scheme.

A20/Lunsford Lane/Winterfield Lane

Drawing number 182600-006 has been provided to show a potential scheme to mitigate the impact of the development. A safety audit is required to assess the effects of the scheme.

A20/Ashton Way/Oxley Shaw Lane/Castle Way

The developments are expected to generate an additional 117 movements during the AM peak and 95 in the PM peak. The results of the capacity assessment indicate that there is a detrimental impact. An assessment of the situation using the flows from the revised Visum model would be useful.

Kiln Barn Road/Site Access

The results of the capacity assessment indicates that the proposed junction has sufficient capacity for each scenario modelled.

Table 6.7 provides an account of the traffic flows along the local roads. This appears to be incorrect as it doesn't correspond with Fig. 10 which shows the background traffic flows. For instance, Fig 10 indicates the 2031 flows of 216 on Bradbourne Lane in the AM peak and 84 in

the PM peak but Table 6.7 states the flow is 358 and 309 respectively. Similar significant discrepancies occur for Kiln Barn Road with Fig. 10 showing flows of 107 in the AM peak and 277 in the PM peak compared to flows of 461 and 536 respectively at Table 6.7.

Para. 5.11 states that the turning movements at the A20/Bradbourne Lane junction has been assumed to be 30% of that of the A20/Station Road/New Road junction. A separate traffic turning count is required in order to accurately assess the impact at this junction.

Para 2.18 indicates that a peak hour turning count was undertaken at the New Road/St. Peters Road junction so these flows could be used to inform the distribution diagrams.

Conclusion

There are some areas where additional information is required as identified above.

The traffic generated by the development is at a level that would significantly add to existing capacity issues resulting in further delays and queuing on the existing highway network. Although some highway improvements are proposed these do not adequately mitigate the effects of the development.

Until these issues have been adequately addressed I am not able to find the application acceptable.

If you require any clarification on any of the above please let me know.

Kind Regards

Louise Rowlands

Principal Transport & Development Planner



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Highways and Transportation

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Tel: 03000 418181
Date: 16 May 2019

Application - TM/18/02966/OA

Location - Development Site South Of Brampton Field Between Bradbourne Lane And Kiln Barn Road, Ditton, Aylesford, Kent

Proposal - Outline Application: Development of the site to provide up to 300 dwellings (Use Class C3) and provision of new access off Kiln Barn Road. All other matters reserved for future consideration.

Dear Maria

Thank you for re-consulting me on this planning application. Further to my previous consultation response, I have recently received a Technical Note from Ardent Consultant Engineers dated May 2019 and I have the following comments to make;

Access

Drawing number 182600-003D indicates the proposed site access, the location of the emergency access onto Kiln Barn Road and the pedestrian crossing facilities; these details are subject to a satisfactory safety audit. A safety audit has been requested and this has yet to be received. Drawing Number 182600-14 shows the swept path which is acceptable.

As stated previously, the illustrative masterplan includes a layout with long straight distributor roads which are likely to lead to speeding issues. It has been recommended that the layout is amended to a design with road alignments which physically reduce speeds to 20mph whilst allowing access for buses if required. The applicant has confirmed that this will be included at the reserved matters stage.

Accessibility

It is important that the development site links well with existing residential communities and facilities. There are existing public rights of way linking the site with the A20 to the north and to East Malling to the south west. Upgrades are required where possible to improve use for pedestrians and to allow use by cyclists. A scheme is required showing the proposed improvements.

Impact

The additional development generated traffic movements are shown below with a comparison with the 2018 recorded traffic flows:

Ditton Edge Site B	AM Peak (2 way flows)	2018 flows	PM Peak (2 way flows)	2018 flows
Kiln Barn Road south	32	92	24	238
Kiln Barn Road north	186	280	151	393
Bradbourne Lane	17	341	14	271
New Road, Ditton	169	435	137	476

The above is included in the Technical report at para. 2.22 Table 1 and is based on survey data which is included in Appendix E of the December 2018 Transport Assessment.

KCC's Visum model of the A20 area has recently been updated to reflect the current draft Local Plan development strategy and forecast junction capacity assessments have been completed for the key junctions along the A20 between the A228 and Coldharbour roundabout. The current application sites are included as allocations in the draft Local Plan; however, the quantum of development is different as outlined in the table below:

	Draft Local Plan Allocation	Current Planning Application
Ditton Edge (site B)	216	300
Parkside E. Malling (site C)	205	106

Whilst the total development numbers are broadly similar the distribution of traffic will be altered, and the impact may be changed. A first principles approach was agreed to assess the impact of the current planning applications using the latest Visum traffic flows which are available in the Visum Junction Assessments report.

The results for the junction of A20/New Road, East Malling are shown in Table 2, and the results for A20/Station Road/New Road, Ditton are shown in Table 3 of Ardent's Technical Note. Both the 2031 'do minimum' results differ from those in the Visum Junction Assessments report. This is concerning as the junction designs and Linsig files were provided in order that the background data could be matched.

Assessments have been completed for the following scenarios for both site B and for site C separately and cumulatively:

2031 'do minimum' scenario – no improvements and no Local Plan development

2031 'do something with KCC proposed improvements

2031 'do something' with Ardent proposed improvements

The Forecast Junction Assessments prepared for the T&M Local Plan have shown significant improvements to the capacity of the A20 junctions through highway improvements designed by KCC Highways and also by the opening of the Bellingham Way link road which is a requirement of the Aylesford Newsprint site redevelopment.

The capacity assessment scenarios modelled in the Technical Note include for scaled down improvements put forward by Ardent to mitigate the impact of the current planning applications. However, it seems that the traffic flows used in the modelling include the reduced level of traffic on the A20 due to the opening of the Bellingham Way link. Without the link road, the traffic

along the A20 will be higher and therefore the results of the capacity assessment will be different.

In order to assess the impact of the developments, including the draft Local Plan development strategy, the junctions should be modelled and assessed to ensure that the amended levels of development on the two sites do not result in an adverse impact on the highway network. This assessment should compare the 2031 Do Something Reg 19 scenario with the same scenario but with the amended levels of housing.

Additionally, although the draft Local Plan has been submitted to the Planning Inspectorate and is therefore a material consideration, it is a draft and therefore there is no guarantee that the development strategy will be approved. The development strategy includes for junction improvements and new link roads so additional assessments are required to inform of the impact of the planning applications without the Local Plan development strategy. This assessment should compare the 2031 Do Minimum, as set out in the Visum Junctions Assessment report, with the same scenario but including the development traffic and the mitigation proposed by the applicant.

There are several junctions along the A20 corridor which have been identified as having capacity problems and the traffic generated from the application sites will impact on these junctions. Highway improvements schemes are being progressed by KCC which, if delivered, would improve journey times and capacity through the A20 corridor. The delivery of the junction improvements is required to accommodate the traffic generated by the development and reasonable and proportionate contributions are sought, however the deliverability of these schemes is not assured as there are funding and/or land issues which are not resolved. KCC Highways are working to resolve these issues and bring forward the highway improvement schemes.

However, until these issues are resolved, and the additional information and clarification outlined above is provided, I would wish to make a holding objection to this application.

Further consideration will be given when further information is available to satisfy the concerns raised.

Yours sincerely

Louise Rowlands
Principal Transport & Development Planner



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Tel: 03000 418181
Date: 4 December 2019

Application - TM/18/02966/OA

Location - Development Site South Of Brampton Field Between Bradbourne Lane And Kiln Barn Road, Ditton, Aylesford, Kent

Proposal - Outline Application: Development of the site to provide up to 300 dwellings (Use Class C3) and provision of new access off Kiln Barn Road. All other matters reserved for future consideration.

Dear Maria

I refer to my previous consultation responses relating to this application dated 16th May 2019 and 21st January 2019.

A significant amount of technical information has been submitted in respect of this application site and the latest was provided in an email dated 15th July 2019 which seeks to address the outstanding highway concerns.

Access

Drawing number 182600-003E indicates the proposed site access, the location of the emergency access onto Kiln Barn Road and the pedestrian crossing facilities; these details have been subject to a stage 1 safety audit and found to be acceptable.

Accessibility

It is important that the development site links well with existing residential communities and facilities. There are existing public rights of way linking the site with Ditton to the north and east and to East Malling to the south west. Upgrades are required to improve use for pedestrians and to allow use by cyclists. As a minimum this should include the upgrade of PRoW MR100 and MR102 between the site towards East Malling rail station to provide a convenient cycle route (albeit not continuous) and a link to Brampton Fields. Additionally, a new footway is to be provided along the site frontage with a crossing facility to connect with the existing footway on Kiln Barn Road.

Traffic Generation

The additional development generated traffic movements are shown below with a comparison with the 2018 recorded traffic flows:

Ditton Edge Site B	AM Peak dev flows	2018 flows	PM dev flows	2018 flows
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Kiln Barn Road south	32	92	24	238
Kiln Barn Road north	186	280 269	151	393 330
Bradbourne Lane	17	341 345	14	271 438
New Road, Ditton	169	435 442	137	476 478

The 2018 flows are taken from the July 2018 ATC survey and since then a junction turning count survey was completed in November 2018 at the junction of Kiln Barn Road/New Road and St Peters Road. The flows from the turning count survey differ quite significantly as shown in **red** above.

Additionally, Fig 14 of the Technical Note, which shows the 2018 observed traffic flows, doesn't tally with the November 2018 survey. Please could this be checked.

Traffic Distribution

With regard to the distribution of traffic from the site to New Road and St Peters Road, I previously requested that an analysis of the junction survey be made in order to compare the distribution of traffic at the junction with that in the previous distribution assessment contained in the TA. I have checked against the survey and my findings indicate some differences to the proportions shown in Plate 3 of your Technical Note. The proportion for the PM peak arrivals would be significantly different with 51% arriving from New Road and 49 % from St Peters Road. The difference in the results would mean a larger percentage of development traffic using Bradbourne Lane to access the A20. Please could this also be revisited. Also please clarify the source of the junction turning movements used in the assessment of the A20/Bradbourne Lane. I am concerned that the additional traffic may have a detrimental impact on St Peters Road, Bradbourne Lane and the A20/Bradbourne Lane junction.

Impact

Additional capacity assessments were requested as the current application sites are included as allocations in the draft Local Plan, however, the quantum of development is different as outlined in the table below:

	Draft Local Plan Allocation	Current Planning Application
Ditton Edge (site B)	216	300
Parkside E. Malling (site C)	205	106

Key junctions have been modelled and assessed to ensure that the amended levels of development on the two sites do not result in an adverse impact on the highway network. Additionally, although the draft Local Plan has been submitted to the Planning Inspectorate, it is a draft and therefore there is no guarantee that the development strategy will be approved. The development strategy includes for junction improvements and new link roads so additional assessments were requested to inform of the impact of the planning applications without the Local Plan development strategy.

A wide range of capacity assessments have been completed for the A20 junctions and these include assessments for both the Ditton Edge site (site B) and for Parkside East Malling (site C) separately and cumulatively. The results indicate that the junction improvements proposed at the A20/New Road and A20/Station Road/New Road will fully mitigate the impact of the proposed development of these sites.

The A20/New Road improvement proposal is to be delivered by the developer of the Parkside site (application TM/18/03008).

For the junction of A20/New Road/Station Road the current Ditton Edge applicant is willing to provide a junction improvements scheme as shown on drawing number 182600-017 Rev A. The drawing has been copied from the KCC scheme design and is therefore acceptable in principle although some changes are required to remove the cycleway shown through the junction.

Additionally, the applicant has agreed to provide financial contributions through a S106 Agreement towards further off-site highway improvements and bus service/journey time enhancements along the A20 corridor as listed below and this is considered acceptable:

£910 per dwelling towards bus services enhancements/ bus infrastructure and / or bus journey time improvements in order to encourage sustainable travel.

S106 contribution of £1547.62 per dwelling towards highway improvements along the A20 between the junctions of the A228 and Coldharbour roundabout.

Conclusion

Please could further consideration be given to the points raised above concerning St Peters Road, Bradbourne Lane and the A20/Bradbourne Lane junction. Further consideration will be given when further information is available to satisfy the concerns raised.

Yours sincerely

Louise Rowlands
Principal Transport & Development Planner



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Date: 13 February 2020

Application - TM/18/02966/OA

Location - Development Site South Of Brampton Field Between Bradbourne Lane And Kiln Barn Road, Ditton, Aylesford, Kent

Proposal - Outline Application: Development of the site to provide up to 300 dwellings (Use Class C3) and provision of new access off Kiln Barn Road. All other matters reserved for future consideration.

Dear Maria

I refer to my previous consultation responses relating to this application dated 21st January 2019, 16th May 2019, and 4th December 2019.

My latest response of December 2019 requested additional information be provided regarding traffic flow information, traffic distribution and impact at the A20/Bradbourne Lane junction. The applicant has responded to this and their consultants Ardent have submitted a Transport Assessment Addendum aiming to address the outstanding highway concerns.

Access

Access to the site is proposed from Kiln Barn road with an additional emergency access provided. This is shown on Drawing Number 182600-003E; a safety audit has been completed and the arrangement is found to be acceptable.

Accessibility

A new footway is to be provided along the site frontage with a crossing facility to connect with the existing footway on Kiln Barn Road. There are existing public rights of way linking the site with the A20 to the north and to East Malling to the south west. Upgrades are required where possible to improve use for pedestrians and to allow use by cyclists. KCC Public Rights of Way team have provided comments dated February 2019 which require improvements as follows:

In line with Kent Design guidance, provision for walkers and cyclists should be provided within traffic free, wide green corridors of open space, and should not be confined behind rear gardens or close to roads.

Unfortunately, the treatment of public footpath MR100 has not been well considered and the proposed main access road will run adjacent to the PROW. We ask that the applicant considers an alternative layout to accommodate the PROW within a wide green corridor of open space, away from the main access road, providing new residents opportunities for recreation, active travel and exercise. At the very least we ask that the applicant considers a wider buffer between the road and the PROW.

We would expect the PROW to be surfaced to a minimum width of 2m to help mitigate the impact of the development and increased use of the route.

We ask that the specification of such surfacing is approved by the PROW and Access Service prior to works taking place.'

The applicant has indicated that these matters will be addressed at the reserved matters stage.

Traffic Generation

The development generated traffic movements have been estimated using the TRICs database and are shown below:

Ditton Edge Site B	AM Peak dev flows	PM dev flows
Kiln Barn Road south	32	24
Kiln Barn Road north	186	151
Bradbourne Lane	17	14
New Road, Ditton	169	137

Traffic Surveys and Distribution

Concerns raised regarding discrepancies in traffic flows taken from traffic counts have been explained. Automatic traffic counts were taken in July 2018 (in term time) on Kiln Barn Road close to the proposed site access and a junction turning count at Kiln Barn Road/New Road/St Peters Road in November 2018. An explanation of the traffic distribution methodology has also been provided at para 3.3.2 following the previous concerns raised and this is acceptable.

Impact

As stated in my previous response a wide range of capacity assessments have been completed for the junctions along the A20 and these include assessments for both the Ditton Edge site (site B) and for Parkside East Malling (site C) separately and cumulatively. Assessments have been completed both with and without the emerging Local Plan development strategy in place. The results indicate that the junction improvements proposed by the developer of this site at the A20/Station Road/New Road junction, as shown on drawing number 182600-017A, will fully mitigate the impact of the proposed developments. This junction improvement scheme would be delivered by the developer in accordance with a S278 Agreement.

The applicant has also agreed to provide contributions towards further offsite highway improvements and bus services/bus journey time improvements for the A20 corridor to further mitigate their impact.

Additional assessments were requested to check the impact at the A20/Bradbourne Lane junction. New traffic surveys were completed, and growth factors applied to the surveyed flows

to provide 2031 traffic flows. The junction has been modelled for the future scenarios (2031) both with and without development traffic. Again, scenarios for both with and without the Local Plan development strategy were assessed.

The results of the capacity assessment for the A20/Bradbourne Lane junction indicate that the junction will work within capacity in 2031 in all scenarios modelled.

Conclusion

Additional information and progress have been made which address the concerns previously raised and I am sufficiently confident that adequate mitigating measures and contributions towards planned improvements can be provided to make this development acceptable in terms of highway impact. I therefore confirm that I do not wish to raise objection subject to the following conditions:

1. No development shall commence until the planned improvements, being delivered by KCC Highways to the junction of A20/Mills Road/ Hall Road, are substantially completed.
2. No occupation of development until the improvement to the junction of A20/ Station Road/New Road are completed. These works to be provided by the developer as shown in principle on Drawing number 182600-017A in accordance with a S278 Agreement. All details to be agreed with KCC Highways.
3. Access to the site onto Kiln Barn Road to be provided as indicated on Drawing number 182600-003E and to include the emergency access, a new footway and a crossing facility to connect with the existing footway on Kiln Barn Road. Improvements to PRow to be provided as required by PRow team.
4. A financial contribution of £910 per dwelling is required towards bus service enhancements/ bus infrastructure and or bus journey time improvements in order to encourage sustainable travel.
5. A financial contribution of £1547.62 per dwelling towards highway improvements along the A20 between the junctions of the A228 and Coldharbour roundabout.
6. Submission of a Construction Management Plan before the commencement of any development on site to include the following:
 - (a) Routing of construction and delivery vehicles to / from site
 - (b) Parking and turning areas for construction and delivery vehicles and site personnel
 - (c) Timing of deliveries
 - (d) Provision of wheel washing facilities
 - (e) Temporary traffic management / signage
7. The proposed roads, footways, footpaths, verges, junctions, street lighting, sewers, drains, retaining walls, service routes, surface water outfall, vehicle overhang margins, embankments, visibility splays, accesses, carriageway gradients, driveway gradients, car parking and street furniture to be laid out and constructed in accordance with details to be submitted to and approved by the Local Planning Authority.

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 sincerely

Louise Rowlands
Principal Transport & Development Planner