

**TM/19/00376/OAEA**

**Annex 2 (Response from KCC H&T)**

Initial response



**Highways and Transportation**  
Ashford Highway Depot  
4 Javelin Way  
Ashford  
TN24 8AD  
Tel: 03000 418181  
Date: 11 March 2019

**Tonbridge & Malling Borough Council**  
Development Control  
Gibson Building  
Gibson Drive  
Kings Hill  
West Malling, Kent  
ME19 4LZ

**App. Ref.** TM/19/00376/OAEA

**Location** Land South West Of London Road And West Of Castor Park, Allington, Maidstone, Kent

**Proposal** **Outline Application: permission for layout, access and scale for a residential scheme of 106 units comprising mix of 1, 2, 3 and 4 bedroom dwellings (including bungalows, houses and apartments), associated access and infrastructure.**

Matthew

Thank you for inviting me to comment on this application. Following previous submissions and studies regarding this site I would like to confirm two points.

1. It is evident, as indicated by the applicant's consultant's own work, that the demands on the A20 Coldharbour Roundabout are over its capacity. As the applicant is aware, this authority is intending to construct a larger (un-signalised) roundabout utilising land to the north west. It is my understanding that the design and land acquisition is progressing. However, it is not considered that any approvals for development of this site could be given until there is a final confirmation/commitment that the roundabout is to be constructed.
2. Following technical checks regarding the modelling of the traffic signals at Beaver Road, it has been made clear to me by our traffic signals team, that operation of these signals will not be adjusted in a way that reduces any priority given to the strategic A20. Future scenario modelling of this junction should therefore be undertaken in accordance with this criterion.

I hope that these points are clear and that any future analysis or submissions as part of a future application, incorporating a full EIA, will be undertaken accordingly. In the meantime, if I can be of any further assistance, please do not hesitate to contact me.

Yours faithfully

**Terry Drury**  
Senior Development Planner

## Seconds response



**Tonbridge & Malling Borough Council**  
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**Highways and Transportation**  
Ashford Highway Depot  
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Ashford  
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**Tel:** 03000 418181  
**Date:** 12 August 2020

**Application - TM/19/00376/OAEA**  
**Location - Land South West Of London Road And West Of Castor Park, Allington, Maidstone, Kent**  
**Proposal - Outline Application: permission for layout, access and scale for a residential scheme of 106 units comprising mix of 1, 2, 3 and 4 bedroom dwellings (including bungalows, houses and apartments), associated access and infrastructure.**

Dear Matthew

Thank you for consulting me on the submitted Transport Assessment Third Addendum (TATA) dated June 2020. I have the following comments to make:

The Third Addendum provides an analysis of impact of the development, including for the emerging Local Plan development strategy. This is done by making use of the latest Visum derived traffic flows for the end of the Local Plan period 2031, as included in the March 2019 A20 Corridor Junction Assessments report  
[www.tmbc.gov.uk/services/planning-and-development/planning/planning-local-plans/local-plan-examination-contents/examination-documents](http://www.tmbc.gov.uk/services/planning-and-development/planning/planning-local-plans/local-plan-examination-contents/examination-documents).

The Transport Assessment Third Addendum provides additional highway capacity analysis and should be read in association with the previous transport related documents namely the Transport Assessment dated February 2019, the Transport Assessment Addendum dated November 2018 and the Transport Assessment Second Addendum dated January 2019.

I have reviewed the Third Addendum and my comments are as follows:

I would point out that Para 1.6 is not accurate as both the 2018 and 2019 Visum models and Forecast Junction Assessment Reports included the Aylesford South allocation of 1000 homes in the Do Something scenario. The Aylesford South allocation comprises of three sites: TM/17/01595 Whitepost Field, which has been granted permission for 840 homes; Barming Depot, for which no application has been received; and the current application site. Collectively the three sites are allocated 1000 homes on the Aylesford South Strategic site under Policy LP28 of the emerging TMBC Local Plan.

The difference between the 2018 and 2019 Visum models is that the Local Plan development strategy was amended following the Reg 18 consultation and the March 2019 model and Junction Assessment Report reflects the changes which were taken forward to Reg 19 and which has subsequently been submitted to the Inspectorate.

In order to assess the impact on the surrounding highway network the development traffic generated from the application site is removed from the 2031 Do Something scenario. This provides an assessment for 2031 with the Local Plan development scenario without the traffic generated from the application site. This scenario is referred to as 2031 DM in the Third Addendum. The traffic generated from the application site is reassigned onto the highway network to and from Beaver Road to provide a 2031 scenario with the Local Plan development strategy in place and with the development traffic generated from this application. This scenario is referred to as 2031 DS plus Dev in the Third Addendum.

### **Impact**

Junction capacity assessments have been completed for the following junctions:

A20 London Road/Castle Road/Conway Road signalised junction  
A20 London Road/ Bunyard Way/Beaver Road signalised junction  
Poppyfields Roundabout  
Coldharbour Roundabout

The scenarios modelled in the Third Addendum are as follows:

2031 Do Minimum (including TMBC Local Plan development strategy) without Clarendon development AM and PM peak  
2031 Do Something as above with Clarendon development AM and PM peak

#### **A20 London Road/Castle Road/Conway Road signalised junction**

Para 4.5 indicates that Table 4.1 demonstrates there is less traffic travelling through the junction in the 2031 DS scenario than the 2031 DM plus dev scenario in the AM peak. The table doesn't include a DM plus dev scenario and it doesn't actually show the amount of traffic travelling through the junction but the results of the capacity assessment. The results indicate no worsening to capacity in the AM peak and some worsening in the PM peak with the greatest impact on London Road (N) where the Degree of Saturation increases from 85.4% to 90.3% and the mean maximum queues are expected to increase from 36 pcu's to 44 pcu's.

#### **A20 London Road/ Bunyard Way/Beaver Road**

The results indicate no worsening to capacity in the AM peak and some worsening in the PM peak with the greatest impact on Beaver Road left turn where the Degree of Saturation increases from 60.6% to 156.1% and the mean max queue increases from 6 pcus to 23 pcus. Mitigation is proposed by way of provision of Keep Clear markings.

#### **Poppyfields Roundabout**

The results of the assessment indicate that all arms are expected to operate within capacity and there is no material impact arising from the Clarendon Homes development traffic.

#### **Coldharbour Lane Roundabout**

The results of the assessment indicate that all arms are expected to operate within capacity and there is no material impact arising from the Clarendon Homes development traffic.

**Sensitivity test**

A sensitivity test is included which assigns all traffic generated by the Clarendon Homes development site and travelling west on the A20, through Jn 5 M20. The results of the assessment to the Coldharbour Roundabout indicates no material impact.

**M20 Junction 5**

A capacity assessment is not included for M20 junction 5 however this has been assessed previously in the Visum study which was prepared for the Tonbridge & Malling Borough Council Local Plan and the Clarendon Homes site was included in that 2031 Do Something assessment. The information provided at Figures 7 and 8 indicates that the development is likely to generate 25 additional traffic movements through the junction in the AM peak and 32 in the PM peak.

**Conclusion**

The Transport Addendum Third Addendum provides further capacity assessments using the traffic flows for 2031 derived from the most recent Visum model which include growth, committed development and the emerging Local Plan development strategy as reported in the March 2019 A20 Corridor Junction Assessments report. Assessments have been completed on key junctions and the findings indicate that the development will have a negligible impact on the junctions of Poppyfields Roundabout and Coldharbour Roundabout. The junctions have both been modelled in this Addendum assuming the improvement works have been completed.

The assessment indicates that there will be some impact at the junction of A20 London Road/Castle Road/Conway Road signalised junction, however the junction would remain within capacity. The junction of A20 London Road/ Bunyard Way/Beaver Road signalised junction becomes over capacity in the 2031 with development scenario with excessive queuing which is likely to block back across the access to the development site. Mitigation is proposed by provision of Keep Clear markings. This is not considered sufficient to address the queues and delays expected to occur as a result of this development.

Further consideration will be given once a scheme is put forward to mitigate the impact of this development at the A20/Beaver Road/Bunyard Way junction.

An application for a Household Waste Recycling facility KCC/TM/0284/2019 has recently been granted permission and traffic generated from this site should be included in the impact assessments.

The recently permitted planning application TM/17/01595 for the development of 840 homes at the Whitepost Field site, includes a requirement in the S106 Agreement that the developer of the Clarendon Land and the St Mowden Lane contribute towards the highway improvements provided by the Whitepost Field developer in respect of the Poppyfields roundabout and the Hermitage Lane roundabout. In view of this please provide details of the additional traffic generated through these junctions in order that a reasonable and fair contribution can be calculated. An extract from the S106 is provided below:

*If the County Council considers (in its reasonable opinion) that the Clarendon Land and/or St Modwen Land would have a material impact either singularly or cumulatively on the operation of Poppyfields Roundabout and any such contribution would meet the requirements of the CIL Regulations the Council shall use all reasonable endeavours to secure a financial contribution payable to the County Council towards the cost of the Poppyfields Roundabout from the Clarendon Land and/or the St Modwen Land.*

*If the County Council considers (in its reasonable opinion) that the Clarendon Land and/or St Modwen Land would have a material impact either singularly or cumulatively on the operation of Hermitage Lane Roundabout and any such contribution would meet the requirements of the CIL Regulations the Council shall use all reasonable endeavours to secure a financial contribution payable to the County Council towards the cost of the Hermitage Lane Roundabout from the Clarendon Land and/or St Modwen Land.*

I hope this information is helpful and if you require further clarification or wish to discuss please get in touch.

Yours sincerely

Louise Rowlands  
Principal Transport & Development Planner

## Third Response



### Highways and Transportation

Ashford Highway Depot  
4 Javelin Way  
Ashford  
TN24 8AD

Tel: 03000 418181

Date: 17 September 2020

### Tonbridge & Malling Borough Council

Development Control  
Gibson Building  
Gibson Drive  
Kings Hill  
West Malling, Kent  
ME19 4LZ

**Application - TM/19/00376/OAEA**

**Location - Land South West Of London Road And West Of Castor Park, Allington, Maidstone, Kent**

**Proposal - Outline Application: permission for layout, access and scale for a residential scheme of 106 units comprising mix of 1, 2, 3 and 4 bedroom dwellings (including bungalows, houses and apartments), associated access and infrastructure.**

Dear Matthew

Thank you for consulting me on the submitted Transport Assessment Fourth Addendum (TAF4) dated September 2020.

The Fourth Addendum seeks to address the concerns raised by KCC Highways in their consultation response dated 12 August 2020 which are outlined below for ease of reference:

*Further consideration will be given once a scheme is put forward to mitigate the impact of this development at the A20/Beaver Road/Bunyard Way junction.*

*An application for a Household Waste Recycling facility (HWRC) KCC/TM/0284/2019 has recently been granted permission and traffic generated from this site should be included in the impact assessments.*

*The recently permitted planning application TM/17/01595 for the development of 840 homes at the Whitepost Field site, includes a requirement in the S106 Agreement that the developer of the Clarendon Land and the St Mowden Lane contribute towards the highway improvements provided by the Whitepost Field developer in respect of the Poppyfields roundabout and the Hermitage Lane roundabout. In view of this please provide details of the additional traffic generated through these junctions in order that a reasonable and fair contribution can be calculated.*

### **A20/Bunyard Way/Beaver Road**

The junction of A20/Beaver Road/Bunyard Way has been remodelled to include the traffic flows from the HWRC. The modelling includes the flows presented in the HWRC Transport Assessment dated December 2019. The flows generated by the HWRC were updated to

reflect adjusted distribution and these are included in Technical Note 1 dated March 2020. The modelling for this junction presented by Odyssey in TATF is therefore particularly robust as it includes for a higher level of traffic through the junction from the HWRC than presented in Technical Note 1.

The junction was modelled previously in the Third Addendum and it was found to operate over capacity in the PM peak in 2031 with the Local Plan development strategy in place and with the development. The greatest impact being on Beaver Road left turn where the Degree of Saturation increased from 60.6% to 156.1% (see note 1) and the mean max queue increased from 6 to 23 vehicles. Mitigation was proposed by way of provision of Keep Clear markings and KCC Highways requested additional measures be provided.

The additional modelling presented in the Fourth Addendum includes the following scenarios for both AM and PM peaks:

2024 base

2024 with committed developments (including HWRC)

2024 with committed developments + proposed development

2031 Do minimum without Local Plan development strategy

2031 Do minimum with committed development (including HWRC)

2031 Do minimum with committed development + proposed development

2031 Do Something with Local Plan development strategy

2031 Do something with committed development (including HWRC)

2031 Do Something with committed development + proposed development

The results of the assessments indicate that the proposed development will have a significant impact on the Beaver Road arm of the junction leading to excessive queuing and delays.

The applicant is proposing to mitigate the impact of the development on the Beaver Road arm of the junction by the introduction of a left turn filter. The proposal would comprise of an additional signal head being provided but doesn't include alterations to the junction layout. A safety audit has not been completed.

A further assessment has been prepared using the 2031 Do Something scenario plus committed development and including the proposed development and including mitigation in the form of a left turn filter.

The results indicate that the left turn filter would successfully mitigate the impact of the development.

Additionally, a sensitivity test has been modelled for the 2031 Do Something scenario plus committed development plus the proposed development and mitigation. This scenario adjusts the signal timings at the junction and the results show improvements on the Beaver Road arm whilst all other arms remain within capacity.

Note 1 Degree of Saturation desirable capacity is below 90% and theoretical capacity is 100%

The filter lane proposal and the capacity analysis have been reviewed by KCC Traffic Signals team who have confirmed that they would not accept the left turn filter arrow from Beaver Road. This is because such a filter was provided when the layout of the traffic signals was amended to include the new junction of Bunyard Way in 2016. Whilst commissioning the signals it was noted that on three separate occasions (during a two-hour period) a vehicle turned right on the left filter out of Beaver Road. For this reason, the left turn filter was removed. Traffic signals team have confirmed that the configuration at this junction has been changed on three occasions (the left turn arrow was config number one, the side roads running together was config number two, this was revised after a car exited Bunyard Way and hit a bus exiting Beaver Road and the current config where the side roads run separately every other cycle).

Traffic Signals team have confirmed that whilst the proposed left turn arrow would improve capacity this would have a detrimental impact on highway safety and therefore the mitigation proposals are not supported.

### **Poppyfields Roundabout**

The impact of the development at Poppyfields Roundabout has been assessed in the Third Addendum and this included for the improvements to the roundabout which are a requirement of the Whitepost Field permission. The assessment concluded that in the 2031 scenario, with the Local Plan development strategy in place, and with the development traffic generated from this application, that all arms are expected to operate within capacity and there is no material impact arising from the development traffic.

The roundabout has been modelled again in the Fourth Addendum both with and without the improvement scheme in place. The following scenarios have been modelled for both the AM and PM peak period:

- 2024 base with committed development (including HWRC)
- 2024 with committed development + proposed development
- 2031 Do minimum with committed development and proposed development
- 2031 Do something plus committed development
- 2031 Do something plus committed development and proposed development

It should be noted that the committed development includes the HWRC traffic flows.

The results of the 2024 scenarios, without the improvement scheme, indicate that the St Laurence Avenue arm is predicted to operate over desired capacity (see note 2) in the PM peak with an RFC (see note 3) of 0.88 and 6 vehicle queue. The addition of the development traffic increases the RFC on this arm to 0.90 and adds 1 vehicle to the queue. All other arms are predicted to operate within desired capacity both with and without the development traffic.

In the 2031 Do Something scenario (with Local Plan development strategy) with development and with the roundabout improvements in place, the roundabout is predicted to operate within desired capacity on all arms in the peak periods.

It can be seen from the results that the traffic generated from the development site will have a marginal impact on the capacity of the roundabout both as existing and once improved. As there is no material impact there is no requirement for a contribution towards the roundabout improvement scheme to be delivered by the Whitepost Field developer.

Note 2 the desired capacity of a roundabout junction is below 0.85 RFC and the theoretical capacity is 1.0 RFC  
Note 3 RFC is ratio of flow to capacity



**A20/London Road/Castle Road/Conway Road signalised junction**

The junction has not been remodelled to include the HWRC traffic as the level of traffic generated to this junction by that site is minimal.

**A20 Coldharbour Roundabout**

The results of the modelling in the Third Addendum indicate that all arms are expected to operate within capacity and there is no material impact arising from the Clarendon Homes development traffic. This assumes that the KCC planned improvements are complete.

**A20/Hermitage Lane**

The junction of A20 Hermitage Lane has not been included in the capacity assessments. The development is expected to generate 8 new traffic movements through the junction in the AM peak and 5 in the PM peak. This increase in traffic will not lead to any significant impact.

There are several discrepancies found in the Fourth Addendum however these do not have a material impact on the conclusions:

**Conclusions**

A significant amount of work has been completed to assess the impact of this development proposal on the highway network.

Assessments have been completed on key junctions and the findings indicate that the development will have a negligible impact on the junctions of Poppyfields Roundabout and Coldharbour Roundabout.

The Poppyfields Roundabout has been modelled both with and without the improvement scheme in place, which is a requirement of the Whitepost Field permission, and the development has a minimal impact. This being the case, there is no requirement for a contribution towards the roundabout improvement scheme to be delivered by the Whitepost Field developer.

The Coldharbour Lane junction has been modelled with the KCC planned improvement in place. Any permission granted would require the completion of this scheme prior to commencement of development.

The junction of A20 London Road/Castle Road/Conway Road signalised junction was modelled in the Third Addendum and is expected to remain within capacity in the 'with development' scenario.

The junction of A20 London Road/ Bunyard Way/Beaver Road signalised junction becomes over capacity with the introduction of the development traffic with excessive queuing which is likely to block back across the access to the development site. Mitigation is proposed by the introduction of a left turn filter from Beaver Road. The proposal would mitigate the impact of the development in terms of capacity however advice from KCC Traffic Signals engineer is that this would lead to a highway safety problem and this view is based on previous history of such a scheme at this junction.

I am concerned that the proposed mitigation will lead a highway safety problem and a safety audit has not been provided. Without mitigation the traffic associated with this development would lead to a severe impact in terms of capacity at the junction of A20/Beaver Road/Bunyard Way and therefore I recommend that the application be refused in accordance with Para 109 of the NPPF:

NPPF Para. 109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Further consideration will be given if a safety audit of the A20/Beaver Road//Bunyard Way mitigation measures is provided.

Yours sincerely

Louise Rowlands  
Principal Transport & Development Planner

Final response



**Tonbridge & Malling Borough Council**

Development Control  
Gibson Building  
Gibson Drive  
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West Malling, Kent  
ME19 4LZ

**Highways and Transportation**

Ashford Highway Depot  
4 Javelin Way  
Ashford  
TN24 8AD

**Tel:** 03000 418181  
**Date:** 15 December 2020

**Application - TM/19/00376/OAEA**

**Location - Land South West Of London Road And West Of Castor Park, Allington, Maidstone, Kent**

**Proposal - Outline Application: permission for layout, access and scale for a residential scheme of 106 units comprising mix of 1, 2, 3 and 4 bedroom dwellings (including bungalows, houses and apartments), associated access and infrastructure.**

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters :-

Thank you for providing Junction Mitigation Technical Note prepared by Odyssey, dated November 2020, for Clarendon Homes, to address previous design concerns over the signalised junction of A20/Beaver Road/Bunyard Way.

Revised junction layout (drawing no. 17-243/009) and Swept path analysis (drawing no. 17-243/010), both dated Sept 2020, have been submitted to address previous comments raised by Kent CC ITS Team. The latest drawings now allay previous safety worries. The accompanied Stage 1 Road Safety Audit within Appendix E also does not raise any additional unforeseen design concerns.

In light of the above, KCC Highways do not raise any further objections to this application, in the event that the Local Planning Authority is minded to approve the planning application, KCC Highways require that the following should be secured via planning condition:

1. 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
  - (f) Provision of measures to prevent the discharge of surface water onto the highway.
  
2. The development shall not be brought into use until a Travel Plan, to reduce dependency on the private car, has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall include objectives and modal-split targets, a programme of implementation and provision for monitoring, review and improvement. Thereafter, the

Travel Plan shall be put into action and adhered to throughout the life of the development, or that of the Travel Plan itself, whichever is the shorter.

3. 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, emergency access, 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.
4. Provision and permanent retention of the vehicle parking spaces and/or garages shown on the submitted plans prior to the use of the site commencing.
5. Each dwelling to have a electric charging point and apartments to have 10% of active supply to car parking spaces, with a further 10% passive. All Electric Vehicle chargers provided for homeowners in residential developments must be provided to Mode 3 standard (providing up to 7kw) and SMART (enabling Wifi connection). Approved models are shown on the Office for Low Emission Vehicles Homecharge Scheme approved chargepoint model list; <https://www.gov.uk/government/publications/electric-vehicle-homecharge-scheme-approved-chargepoint-model-list>
6. Provision and permanent retention of secure, covered cycle parking facilities prior to the use of the site commencing in accordance with details to be submitted to and approved by the Local Planning Authority.

The following measures should be conditioned for provision via a Section 278 Agreement:

Incorporate signal mitigation for A20/Beaver Road/Bunyard Way junction

- Take signal drawing, cable schematic and TR2500A configuration through to approval with the highway authority ITS team.
- Implement site works to provide the approved layout and signal control as agreed within the first bulletpoint. Any associated site works such as Statutory Undertakers' diversions, street furniture moves ensuring standards are met such as highway street lighting lux, signal ducting, etc.
- Factory Acceptance Testing and Site Acceptance Testing with highway authority sign-off.
- Following works, test site on remote monitoring system
- Finish any snagging items prior to asset sign-off.

**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**