# TM/20/01218/OA - Land Adjacent Ditton Common North of Rede Wood Road Oakapple Lane Barming Kent

## Annex 1 – Responses from Highways England

#### Initial response

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN), in this case the M20 J5.

We note that:

- the site is located within T&M but access to it will be via a new road from Oakapple Lane to be constructed and that lies within Maidstone (that is also within the site edged red)
- the number of dwellings proposed for this development is 118 dwellings,
- the 118 dwellings form part of a wider masterplan with the adjacent site for a total of 305 residential developments.
- in June 2020 we were consulted on the adjacent Maidstone site consisting of 187 dwellings (application 20/501773/FULL – HE Ref 87982 #10189) that will provide the access road. Following the receipt of further information we had no objection to the application.

We have reviewed the submitted Transport Assessment and Framework Travel Plan and offer the following comments. We note the submitted documents contain the same trip generation, trip distribution and traffic impact assessment as those submitted for application 20/501773/FULL which included combined assessment of both sites.

## **Transport Assessment**

## Trip Generation

The parameters and the trip rates generated in TRICS are acceptable for this assessment.

Based on this assessment, we note that the two-way trip generation from the TMBC site is 61 trips during the AM peak, and 69 during the PM peak. The two-way trip generation from both sites combined is 156 AM peak and 178 PM peak. This is accepted.

# Trip Distribution

Highways England note that the trip distribution methodology included within Appendix G is the same as the methodology submitted with the adjacent MBC site for 187 dwellings (Appendix I). We recognise that the assessment specifically focuses on distribution of trips to/from origins and destinations to the south of the development site only, which is of limited use to Highways England, with our main concern being M20 J5, north of the site.

In our previous consultation for the MBC site we required further information be provided regarding trip distribution on the network to the north of the site, and specifically towards the M20 J5. The applicant provided network flow plots for the MBC site.

**Action Required:** Highways England request that an assessment of development traffic only and its distribution across the network is provided, including M20 J5. Additionally, an assessment with combined development distribution of the MBC site and committed development in the area should also be provided as a sensitivity test looking at the impact of cumulative development within the area.

# Junction Capacity Assessment.

We note that the M20 J5 has been included in the junction capacity assessment and the results show that the development will have negligible impact on the junction; however, further assessment within the trip distribution may impact these figures

# Framework Travel Plan

We are content with the proposed Framework Travel Plan and offer no further comments.

# Summary

Therefore, given the need for additional information and/or clarification we are not quite yet in a position to be able to determine whether the proposals will materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/13 particularly para 9 and 10, and MHCLG NPPF particularly para 109). Consequently, we would be grateful if both authority's refrain from determining the application (other than a refusal), ahead of us receiving and responding to the required/requested information. In the event that an authority wishes to permit their

application before this point, we would ask the authority to inform us so that we can provide substantive response based on the position at that known time.

## Subsequent response

On 31 July we received an email from Steve Whittaker acting on behalf of the applicant responding to our initial representation (dated 2 July) with regards the above application.. We were then consulted on the application by TMBC on 20 August. We have therefore taken a little longer than envisaged to assess the application due to the need to check there were no differences in the latest consultation. Our apologies for any inconvenience caused to Maidstone.

Mr Whittaker provided the additional information requested in our initial representation regarding the development only trip distribution and an assessment with combined development distribution with committed development.

Having reviewed the trip distribution information provided, the trips generated by the development utilising the SRN via M20 Junction 5 during peak hours are predicted to be minimal and therefore not expected to have a significant impact on the junction. Likewise, the cumulative assessment shows a negligible increase in trips over the junction which are not expected to have a significant impact. We are satisfied that the development will not materially affect the safety, reliability and/or operation of the strategic road network (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF particularly paragraph 109) in this location and its vicinity.

Accordingly, I attach our formal HEPR response of No Objection.