

Annex 1: Representations made by Highways England

From: [Robin Gilbert](#)
To: [Planning Applications](#)
Cc:
Subject: FRO Case Officer Robin Gilbert: Highways England INITIAL response (our ref 89138 / #11196) re application TM/20/01820/OAEA Aylesford Newsprint Bellingham Way Larkfield Aylesford Kent ME20 7PW
Date: 29 September 2020 17:37:28

For attention of:	Robin Gilbert
Site:	Aylesford Newsprint Bellingham Way Larkfield Aylesford Kent ME20 7PW
Proposal:	Hybrid planning application for the following development: Outline planning permission (all matters reserved) for the erection of flexible B1c/B2/B8 use class buildings and associated access, servicing, parking, landscaping, drainage, remediation and earthworks; and, Full planning permission for erection of two warehouse buildings for flexible B1c/B2/B8 use class, realignment of Bellingham Way link road, creation of a north/south spine road, works to the embankment of Ditton Stream, demolition of existing gatehouse and associated servicing, parking, landscaping, drainage, infrastructure and earthworks
Your Reference:	TM/20/01820/OAEA
Highways England's Reference:	89138 / #11196

Dear Mr Gilbert

Thank you for consulting Highways England on 08 September regarding the above amended application, seeking a response no later than 29 September.

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 SRN, in this case particularly the M20 Junctions 4 and 5 and the M2 Junction 2.

Having reviewed the Transport Assessment (TA) we have the following initial comments:

1. Accessibility Audit

The TA Para 2.44 to 2.47 discuss traffic flows on the M20 in the vicinity of the M20 J4 and 5. The source of the data is not provided so we cannot verify the data. Additionally the development is likely to have an impact on the M2, particularly at Junction 2 which is not included in the assessment.

ACTION – Provide source of evidence for traffic flows. We consider the development is likely to have an impact at the M2 J2 therefore this location should also be considered (see below).

In the context of M20 traffic flows, para 2.47 states that *“The implications of the Covid-19 pandemic will amplify the already growing trend to travel by sustainable modes and active travel. There is likely to be an increase in working from home and increased virtual mobility (which reduces the overall need to travel). There is also forecast to be a change to travel behaviour, for example, in the retail market there is likely to be fewer trips to the foodstore by more people opting for one weekly shop and utilising on line shopping. This is coupled by government ambition to heavily invest in active travel modes to facilitate increased travel by non-car modes”*.

ACTION - This discussion should be more balanced considering the considerable uncertainty of the current situation. It should also consider the potential increase in usage of car travel, for example see <https://www.kentonline.co.uk/kent/news/fears-over-traffic-chaos-when-schools-return-232057/>. DfT have stated that there is currently much evidence gathering occurring to seek to assess the longer term implications of COVID on travel patterns. The evidence and any change in policy may be available in 2021. Therefore, unless the applicant is able to provide robust, agreed evidence on this point, they should stick to tried and tested assumptions and methodologies.

2. Section 3 – Policy

The Policy Section does not refer to any Highways England Guidance, including:

- DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development (Sept 2013) <https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development>
- Planning for the future – A guide to working with Highways England on planning matters (Sept 2015) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/461023/N150227_-_Highways_England_Planning_Document_FINAL-lo.pdf

ACTION – This section should, as a minimum should reference the above. The Transport Assessment methodology should align with the contents of these documents.

3. Transport Impact

Trip Generation

Previous Use

Para 5.31 of the TA states that *“KCC and TMBC have confirmed that traffic impact of the development can be considered in the context of the net change from the traffic generation forecast associated with the previous use of the site (85,000sqm of B2 floorspace).”*

We note that the Pell Frischmann Transport Assessment supporting planning application 16/03025 undertook a first principles

assessment. They note in para 7.21 that "Aylesford Newsprint management provided records of resource consumption and paper production for the past 10 years (and a detailed breakdown for the year 2014, the last full year of the paper mill operation), which also include delivery vehicle trips. It can be noted that the termination of the paper mill production was sudden, without a gradual slow down. Therefore, the 2014 figures have been used as the basis of the extant trip generation calculations as they are representative of the usual operational conditions". Based on 2014 usage, they calculated that the trip generation of the site would be 112 vehicles in the AM peak and 146 in the PM peak (see table 7.10 in the Pell Frischmann Transport Assessment).

The Previous Use is presented in this TA in para 5.32 and Table 5.2 as being 198 AM peak and 264 PM peak vehicles and that this is based on the proposed B2 trip rates calculated for the site (see Trip Generation below). This is considerably higher than that used previously and based on information related to activity between 2004 and 2014.

Additionally, it is understood from the Pell Frischmann Transport Assessment supporting the Planning Application 16/03025 that the previous Aylesford Newsprint usage on site ceased in February 2015. Considering that over 5 years has passed, the validity of considering the site as extant use is disputed.

ACTION – Based on the sites previous usage and the analysis that evidences this from the 16/03025 planning application, we don't accept the 198 AM and 264 PM peak hour trips. Clearly the site never generated this level of trips and it is improbable that it ever would. It is considered exceptionally unlikely that the site could be occupied with that level of B2 trips generated. Furthermore, the Local Plan was based on traffic figures subsequent to when this site ceased to be in use. That capacity on the network would appear now to have been used by other development and therefore the full impact of the development should be tested against the 2031 DM scenario i.e. the scenario without Aylesford Newsprint included. Therefore the applicant should either provide evidence on this point to support higher AM and PM peak hour figures, or make use of the Pell Frischmann figures.

Proposed Development Trip Rates

We note from the planning application that the proposal is for 177,260 of flexible "Other B1(c) / B2 / B8" The TA is more definitive, para 5.4 of the indicates:

- B1c: Up to 15,760 sqm
- B2: Up to 31,250 sqm
- B8 (Storage & Distribution): up to 175,942 sqm
- B8 (Parcel Delivery): up to 35,000 sqm
- Overall total: Up to 177,260 sqm

NOTE – Should the breakdown of proposed development usage differ from the uses presented in the TA, the TA will need to be amended to reflect this.

ACTION - The TA should be based on the worst case scenario ie which combination of uses/ floorspace would generate the greatest amount of AM/ PM peak traffic. This can then be compared with other scenarios, including any favoured scenario ie one the

applicant believes may occur in reality.

Proposed Development Trip Rates

Key assumptions and evidence used to support the analysis in the TA are not referenced within the main text e.g. that the supporting TRICS assessment is provided in an Appendix and references to trip distribution. Having not had sight of Scoping documents this makes the TA difficult to navigate.

ACTION – provide reference and a summary where appropriate to key assumptions and evidence used in the TA.

Table 5.4 outlines that the AM peak trip generation associated with the site will be 544 AM peak and 590 PM peak. Having undertaken a review of the TRICS we obtain a much higher trip rate, particularly in the AM peak period and note the following:

- **All uses** - inconsistency with the site selection – for example, B1 establishes that the sites should be within 'Edge of Town Centre, Suburban Area, Edge of Town, Freestanding – Industrial zone and Out of Town'. However, B2 only includes 'Edge of Town' and 'Neighbourhood Centre', for example. This should be reviewed for all uses.
- **B2** – the applicant has manually doubled the maximum size included within the survey selection to 70,000 sqm – with a maximum site size returned of 67,459 sqm (that is nearly twice the actual size of B2 proposed). This may have artificially inflated the rates.
- **B2** - it is noted in the Pell Frischmann Transport Assessment that the trip rate for B2 (previous and proposed) was based on 10 years of data collected for the full site. The applicant should consider the usage of these rates or justify why these are not now applicable.
- **B8 – Warehousing** – there are many potential warehousing sites that are available and applicable to this site within the TRICS database. However only 3 such sites have been selected by the applicant for inclusion. Our high level analysis identified 11 potential sites which result in a higher overall AM and PM peak hour trip rate.
- **B8 – Parcel** – There is a DHL Parcel facility site (15,563 sqm) which appears to be much more representative of the size and scale that would likely occur at this site. It is more likely to be a regional hub than a depot. The TA dismisses the applicability of the DHL site because it had 40% office/admin attached to it – however the remaining sizes of selected B8 parcel sites contained within the TA are much lower (about a fifth of the DHL parcel site size). The DHL facility should be included in order to provide a more accurate reflection of the potential trip generation of the site

For the above reasons, the vehicle trip gen forecast contained within Table 5.4 is not considered to be sufficiently robust.

ACTION – consider and review the above and re-apply in an updated TRICS assessment.

Trip distribution

Other than in para 1.7 which states that "Vehicle trip distribution as per the VISUM model" there is no discussion of the potential trip distribution of the proposal. It is currently unclear how the trip distribution of the proposed site was represented in the VISUM model and therefore unclear how many development related trips reach the M20 Junction 4 and Junction 5. Additionally, the absence of flow diagrams showing the trip distribution from the site does not enable the impact on the other sections of the SRN to be assessed. The applicant should be aware of Highways England's response to planning application 16/03025 which required a detailed assessment of the M20 Junction 4 and 5 as well as the M2 Junction 2. The M2 Junction 2 is not considered in this assessment.

It is also unclear if the assessment has considered if a change in the proposed usage between the Aylesford Newsprint Local Plan Employment Land Allocation already in the Visum and the proposed development in this application has resulted in a change in trip distribution.

We also note that when in use as a Papermill, it is understood that the private road connecting the site to Station Road was restricted in terms of type and level of use. The Masterplan drawing 18-103-SGP-ZZ-ZZDR-A-001001 Rev P would appear to indicate the private road will become a general access. Therefore the TA will need to explain the proposed changes and assess the implications of this change (both in terms of site traffic and other traffic wishing to make use of the newly available route). Clearly, any significant change in the type and level of use will impact on the A20 and M20J5.

ACTION – Peak hour flow diagrams should be provided of the proposed development (including how this differs from the Aylesford Newsprint Local Plan Employment Land Allocation). This should extend to the wider SRN (including the M2), identifying where the AM and PM peak hour impacts will occur. Once this has been received we will be able to ascertain the extent of any further analysis required.

Consideration of impacts on SRN

This section of the TA considers only the M20 Junction 4 and 5. No other parts of the SRN are included so we are unable to determine if the proposals have an impact elsewhere. For example previous Highways England responses relating to planning application 16/03025 referred additionally to the potential impact of the proposals on the M2 Junction 2.

ACTION - The trip distribution assessment requested above should extend to the wider SRN (including the M2 Junction 2), identifying AM and PM peak hour vehicle movements. Once this has been received we will be able to ascertain the extent of further analysis required.

4. Assessment Methodology

It is understood that the traffic impact of the development is assessed through the KCC VISUM model and that the Aylesford Newsprint Local Plan Employment Land Allocation site has been included as a 160,000 sqm development within the model. This is seemingly not referenced in the TA itself, only in the Appendix which is not cross referenced.

The TA Appendix B Para 4.8 indicates that the VISUM model assumes that the proposed development site would deliver 160,000 sqm of employment land use. Although stated that it is based on the scale of development and trip rates set out within the A20 VISUM Model Forecasting Report dated March 2019 (ref: 18-044-03 Rev B), it is not clear how the trip generation calculations of 1,606 AM peak and 1,066 PM peak have been formulated.

Appendix B Para 4.9 outlines that "The VISUM model assessment assumed that the site could generate 1,606 two-way vehicle trips during the AM peak hour and 1,066 two-way vehicle trips during the PM peak hour. This trip generation forecast should be treated with a degree of caution as it is based on generic trip rates used to assess the traffic impact of the emerging Local Plan and are not representative of the development proposals". Accordingly it is also understood that the Local Plan Employment Land Allocation has been amended to reflect this new proposed development and it is therefore key to verify the Aylesford Newsprint Local Plan Employment Land Allocation trip generation calculations.

ACTION - Provide evidence including specific references to the Forecasting Report detailing the Aylesford development as it was included in the VISUM model and a breakdown of how the 1,606 AM peak and 1,066 PM peak site flows have been calculated. This will allow us to verify the assumptions

5. Transport Impact

The TA Para 6.7 to 6.14 detail the Dataset scenarios. It is suggested that Dataset 2 [2031 Do Nothing + Previous Use of the Site (no link road) VISUM MODEL] and Dataset 4 [2031 Do Something VISUM MODEL] – which includes the proposed development are compared in order to "identify which junctions to assess." It is suggested in para 6.20 that "... junctions that meet both of the following criteria are considered appropriate for further assessment":

- Increase of over 60 vehicles per hour
- Impact of more than 3%*

We will consider the impacts on the SRN once the traffic levels associated with the development have been finalised. In this case a percentage or set number of vehicles as a criteria may not be helpful in identifying if a more detailed junction assessment should be made as it does not necessarily account for the current local network conditions i.e. the existing queues and/or slow moving peak hour traffic that may occur. We do not yet have sufficient information to determine if further analysis of the M20 Junction 4 and 5 (or the M2 Junction 2) is required.

Although this section has not been reviewed, it should be noted that it is not clear which Dataset Scenarios have been compared in Table 6.3 which outlines the change in flows at the M20 J4. The total traffic flows do not match those presented in Table 6.2.

Summary

As is clear from the above, there are many issues raised above regarding the analysis for which we require additional information before undertaking a more complete assessment.

Accordingly, we are not satisfied that the proposals will not materially affect the safety, reliability and / or operation of the SRN (the

tests set out in DfT C2/13 para's 9 & 10 and MHCLG NPPF para 109).

Consequently, the Council should refrain from determining the application (other than a refusal if it so wishes) until such time as the required information has been received, assessed and agreed.

If the Council wishes to determine the application before this point, please contact me and we will provide our formal recommendations as they stand at that time.

Finally, the Council should not assume Highways England's position in relation to any planning matters until such time as Highways England advises. Highways England have a 15 working day response period.

You will note that we have copied our response direct to the applicant's agent. We await their response in due course.

Should you, or they, have any queries regarding this response please contact us at planningse@highwaysengland.co.uk.

Regards

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Please note that for the foreseeable future we are all working from home. All meetings will be via telephone, Skype or similar. We will continue to seek to work to our statutory and other deadlines. In case of IT or other issues, as a precaution, please copy all emails to PlanningSE@highwaysengland.co.uk. Thank you.

We are mindful that everyone is different and everyone's circumstances may be different. We are sharing the following NHS principles

- People are not 'working from home', they are 'at their home during a crisis trying to work'
- People's physical, mental and emotional health are far more important than anything else at present
- If people are currently less productive they should not try to compensate by working longer hours
- People should be gentle on themselves and others, not judging based on how they/ others are coping
- Individual and team success is not to be based on 'normal times' expectations

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