Annex 2: Representations made by KCC Highways and Transportation.

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Date: 29 October 2020

Tonbridge & Malling Borough Council
Development Control
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ME19 4LZ

Application - TM/20/01820/OAEA
Location - Aylesford Newsprint Bellingham Way Larkfield Aylesford Kent ME20 7PW
Proposal - Outline Application: 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

Dear Robin

Thank you for consulting me and allowing additional time to consider this application for the proposed redevelopment of the Aylesford Newsprint site which proposes 177,280m2 commercial floorspace and the opening of the Bellingham Way link road. I note this is a hybrid application for flexible B1(c), B2 and B8 comprising:

Outline permission is sought for 159,235m2 flexible employment floorspace. This is a net increase of 85,550m2 of employment floorspace from that associated with the former Aylesford Newsprint.

Full permission is sought for two units of 6,689m2 and 11,355m2 employment floorspace, the Bellingham Way link road and the north south perimeter road.

I note the use class is to be limited to up to 15,760m2 B1c, 31,250m2 B2 and 177,280m2 B8 and 35,000m2 B8 parcel delivery.

1. Introduction

1.1 The application is supported by a Transport Assessment (TA) prepared by Vectos transport consultants.

1.2 The site is allocated as safeguarded employment land in the 2008 adopted Tonbridge and Malling Borough Council (TMBC) Development Land Allocations Policies Plan. It is also included in the new TMBC draft Local Plan under policy LP35:

LP35: Employment Land: Former Aylesford Newsprint Site

1. Development of the former Aylesford Newsprint site, as illustrated on the proposals map, for light industrial, general industrial and/or storage and distribution uses will be permitted provided that a vehicular access between Bellingham Way and Station Road forms part of the scheme and the development is of an acceptable design to the locality and does not result in unacceptable impacts on the highway network, air quality and the amenity of the area and where it complies with the other policies in the Local Plan.
2. The vehicular access between Bellingham Way and Station Road will be required to be completed and open in advance of the majority of the development of the site taking place.
3. The prospective applicant should prepare a masterplan, to the satisfaction of the Council, delivering the necessary infrastructure to meet the needs of the development.
4. The masterplan needs to be prepared and completed in advance of the formal submission of the planning application. It shall be accompanied by a Planning Performance Agreement.

1.3 I have reviewed the TA and my comments are as follows:

2. Accessibility

2.1 Improvements to existing routes and new footways and cycle facilities are required, to be delivered by the developer, to provide high quality walking and cycling routes and connections to local facilities. This would include:

- The site is well located between two train stations: Aylesford and New Hythe. High quality walking and cycling routes are required to the stations.
- A footway cycle link to Leybourne Lakes and links with existing routes.
- Public rights of way (PRoW) require upgrades, subject to the requirements of KCC PRoW officers.
- The existing public footpath linking Mill Hall with Aylesford village alongside the River Medway, should be upgraded to allow cyclists and hence providing a missing link for cyclists on the route to Maidstone Centre.

- A footway link is needed along the east side of Leybourne Way between new Hythe Lane and the existing footway.
- Separate cycle tracks and footways are required where possible along the Bellingham Way link .

2.2 Consultation with Network Rail and southeastern is recommended in order to assess whether improvements are required at the stations.

2.3 A proposal for a bike hire scheme operated by Arriva for an initial 5-year period is welcomed and sufficient contributions can be secured through a S106 contribution.

2.4 Cycle parking should be provided close to premises in each parking area in accordance with the minimum requirement in the Kent and Medway Vehicle Parking Standards.

2.5 **Bus services**

Regular bus services are available from Ditton Corner bus stop, but this is located some 750m from the closest part of the site and over 1.7km from the north eastern part of the site.

It is noted that the developer has suggested a contribution in a S106 agreement for a service connecting the site with Maidstone on a half hourly frequency. A regular service is needed through the site and bus operators and KCC public transport team should be consulted. Initial comments from that team confirm that new bus services or enhancements to existing services will be needed and the service frequencies and destinations should be based on detailed data on where employees are likely to be travelling from and information on the organisations leasing on the site. A contribution to bus services could be provided by the developer, with the nature of the solution being determined once employee flows / distribution are known.

Improvements are required to the bus stops in the vicinity of the Bricklayers Arms with bus boarders and shelters provided where appropriate.

2.6 **Mobility strategy**

The delivery of a Mobility Strategy including carpooling, car sharing spaces, electric vehicle charging, car park management is welcomed. This will provide new and innovative ways to allow choices in transport mode.

The provision of a car club on site through Enterprise with 1 car club vehicle at year 1 and 2 vehicles at year 2 and 3 with funding secured through a S106 agreement is also welcome. All business are to be provided with free ECC membership for their employees; and 1 years' free personal membership to all employees.

3 Access Strategy

3.1 The Bellingham Way link road has been designed for a 30mph speed limit and includes a 3m wide shared footpath/cycleway and as indicated in 2.1 above, a separate cycletrack and footway is required. The alignment of the road should be designed to physically restrict speeds to 30mph.

3.2 A road safety audit (RSA) is provided at Appendix F however Designers Comments are not included. Any amendment to the drawings arising from the RSA comments should be reaudited.

3.3 Following a review of the proposed link road design, drawing number 205236-A-01, serious concern is raised regarding the reconfigured junction to the far west of the proposed link road which is shown as a staggered crossroads which replaces an existing roundabout. The

stagger distance between the junctions is shown as approximately 25m however, for a right/left turn stagger, with ghost islands the minimum stagger distance should be 50m.

3.4 Further issues are set out below:

- The right turning facility on the bend with a width of 10.3m has an approximate inside radius of 50m. The proposed design shows a right turning lane width of 3m and traffic lanes of 3.65m. Widening would need to be provided on a bend of this size in line with DMRB CD 123 Table 5.10. The masterplan shows a stationary 7.5t van positioned within the bay, but not performing a manoeuvre. The back end of the vehicle may overhang into the carriageway lane. Junction radii also looks tight for vehicles exiting, vehicles may overhang into the right turn lane.
- Forward visibility on the bend is shown at 60m based on the Kent Design Guide and a right turn facility with 10.3m width. This is under the parameters for a local distributor road. 60m would only be appropriate where vehicle speeds will be less than 30mph and this is not likely given the road width and alignment.
- The left in/right out industrial access looks very tight and slightly odd in appearance. It might help if the junction was perpendicular to the road. Forward visibility on the bend is shown at 60m based on Kent Design Guide and speeds are likely to be higher than the required 30mph.
- The inside bend on the link road where the left in/right out junction is located is approximately 40m. The lane width across this section is approximately 8.5m and would need increasing to meet standards set out within DMRB CD 123 Table 5.10.
- Roundabout exit arms look narrow, a wider width is needed in case of breakdowns.
- HGV's overrun lanes on the circulatory carriageway which would lead to collisions.

4 HGV access strategy

4.1 The HGV strategy, which aims to prevent large vehicles entering/exiting the site via Station Road to the east, comprises of some measures to restrict HGV movements at junctions, a HGV turning area located towards the eastern end of the link road, and a weight restriction between the turning area and Station Road. One key concern with the proposed strategy is the proximity of the turning area to the junction with Station Road which may encourage HGV drivers to ignore the weight restriction rather than perform a U-turn. This or an alternative facility should be provided further to the west to prevent likely abuse of the weight restriction. Further design issues are set out below:

- The centre line marking for right turn into the turning area and taper are not lined up properly.
- The pedestrian crossing is angled away from the natural pedestrian desire lines and should be perpendicular.
- Visibility is measured at 4m back from the give way marking rather than 4.5m. Also, the visibility has been measured from the centre of the junction, where in reality the visibility will more likely be required from the centre of the exit lane.
- The turning area itself is quite constrained which makes the vehicle manoeuvre look very difficult and tight, with the risk of vehicles tipping as swept paths look close to full lock.
- The exit radius out of the turning head looks tight with the articulated vehicle very tight against the kerb. At ghost island junctions where no diverge or merge tapers are provided

the corner radii should be 15 metres followed by a corner taper of 1:6 over a distance of 30 metres.

- The taper merge measures 30m which is 1:20/2 if designed along the centreline of the road for a 3m right turn lane width. The proposal provides a 3.5m lane width, so the taper needs to be slightly longer at 35m.

5 Parking

5.1 Parking provision should be provided in accordance with the Kent & Medway Vehicle parking standards which recommends a number of spaces per m2 depending on the amount and type of employment use. The level of provision can be firmed up once reserved matters are proposed in respect of the outline element of the application.

5.2 The application seeks full permission for Units 6 and 7 which comprise of 6,689m2 and 11,355m2 flexible B1, B2, B8 uses. The proposed parking provision is based on a B8 use however should the units be used by the more intensive B1 or B2 uses then the car parking requirements will be higher. Therefore, whilst the car parking provision is acceptable for a typical B8 use of units 6 and 7 this should be conditioned so that alternative parking is made available should B1 or B2 uses come forward. I would also like the applicant to check whether this parking provision is sufficient/appropriate for the parcel delivery use.

5.3 Cycle parking for units 6 and 7 is required at 1 space per 200m2 therefore a minimum of 33 spaces are need for Unit 6 and 57 for unit 7. These should be covered, secure and provided close to the entrance to the units.

6 Crash Analysis

6.1 Crash data has been provided for the 5-year period to 31.12.19 and incidents around junctions have been reviewed in the TA. An appraisal of the crash analysis work indicates that the assumptions reached are valid and no clusters are identified. However, the crash analysis should include the rest of the network in the scoping area.

7 Trip rates

7.1 Trip rates used for the TA purposes have been reviewed and found to be acceptable. The redevelopment of the site is expected to generate 544 vehicle trips in the AM peak and 590 in the PM peak (two-way).

7.2 As agreed by KCC and TMBC the residual impact of the development is to be assessed and therefore the traffic flows generated by the previous B2 use of the site are taken from those generated by the proposed use of the site in order to establish the residual impact. The net increase in traffic flows is therefore 346 two-way traffic movements in the AM peak and 326 in the PM peak when compared to the extant use.

7.3 A multi modal trip generation forecast for staff is included at para. 5.38 and further detail is required of how this has been derived.

8 Traffic Distribution

8.1 The redistribution of traffic arising from the opening of the Bellingham Way link road has been estimated using the KCC VISUM model. The proposed development distribution to the external highway network is included within the Do Something VISUM output flows.

8.2 It is not clear what methodology the proposed development distribution along the new link road was based on, and no flow diagrams are provided to illustrate the flows used for the

assessment. Although there is a level of confidence that the proposed roundabouts work well within capacity further details are required.

8.3 Extant use distribution is undertaken manually based on Nomis data. It is not clear within the TA which Super Output Area was used for this distribution. Further information is required. An initial review of the flow diagram provided indicates that there is a higher percentage of traffic going north on the A228, while a considerably small percentage head west on the M20. A check based on two different super output areas of Nomis implied a more equal split between the two destinations. More details of the distribution exercise needs to be provided as it affects a number of junctions, and most importantly the assessment of the A228/Malling Road/Hays Road roundabout.

9 Growth

9.1 Growth has not been considered when not incorporated within the VISUM model output figures. The applicant has used 2016 observed flows without committed development in junction assessments and not the model output flows for the Running Horse Roundabout and Papyrus Way/New Hythe Lane. For new site access junctions, the model output files indicate 2020 flows are used. The TA argues that no growth has taken place since then, based on historical data, and thus there is no need for growth to be applied. This approach is not accepted as the final year of assessment is 2031, and there is a significant quantum of development planned in this area up to that time. I would refer to KCC's response to this point when it was presented in the Scoping Note:

The trend in traffic flows presented in the Scoping Note at Table 2.4 may reflect the effects of ongoing construction and traffic management in this area over the last few years which include the construction of Smart Motorways, Operation Stack and Operation Brock. These have all had a significant impact on the traffic using Kent's roads. I would recommend the use of Tempro to growth up traffic flows for future year assessment where flows derived from the 2031 VISUM model scenarios are not available.

10 Methodology for junction assessments Modelling scenarios and traffic flows

10.1The Visum **Do Minimum** model includes traffic growthed to 2031 with committed development.

10.2The Visum **Do Something** model includes traffic growthed to 2031 with committed development and the Local Plan development strategy.

10.3The applicant is using the 2031 Do Minimum Visum model + the previous use of the site and comparing against the same scenario with the redevelopment proposal and the Bellingham Way Link Road to assess which junctions should be assessed. The scoping report for the development included a list of 27 junctions requiring assessment. Assessments have been completed for those junctions, from the list of 27, which showed an overall increase of more than 60 vehicles and a 3% increase in total flows through the junction as shown in Table 6.2 : 'Traffic Impact' in the TA. This threshold was not agreed with KCC during pre-app discussions. I would refer to KCC's response to the Scoping Note:

It is agreed that junctions need not be modelled if they are expected to see reduced traffic flows following the opening of Bellingham Way and including the development traffic, however the change to the flows should be provided for clarity. Where an increase in traffic is expected the impact should be assessed.

10.4Table 6.2 'Traffic impact' is copied below for ease of reference. The junctions with orange text are those where capacity assessments have been completed. Capacity assessments

have not been completed for the junctions with blue or green text with the exception of junctions 24 and 25 which are M20 junctions 4 and 5:

Table 6.2: Traffic Impact

	AM				PM Peak			
Link	Do Min + Previous use	Do Something	Change	Impact	Do Min + Previous Use	Do Something	Change	Impact
1. Bellingham Way/New Hythe Lane/Leybourne Way	2038	2371	333	16.3%	2463	2224	-239	-9.7%
2. New Hythe Lane/Papyrus Way	513	596	83	16.2%	658	803	145	22.0%
3. Leybourne Way/Tesco access_IN	1679	1614	-65	-3.8%	1827	1421	-406	-22.2%
4. Leybourne Way/ Tesco egress_OUT	1658	1494	-164	-9.9%	1794	1372	-422	-23.5%
5. Leybourne Way/ Gighill Road	1928	1757	-171	-8.9%	2130	1706	-424	-19.9%
6. Leybourne Way/ Lunsford Lane	2020	1862	-158	-7.8%	2337	1898	-439	-18.8%
7. A228 / Leybourne Way	4034	3999	-35	-0.9%	4950	4582	-368	-7.4%
8. A228 /Malling Road/Hays Road	3034	3163	129	4.3%	3818	3816	-2	-0.1%
9. A228 /Peters Bridge	2906	2659	-247	-8.5%	3031	2927	-104	-3.4%
10. A228/Bull Road	3597	3565	-32	-0.9%	4066	4065	-2	0.0%
11. A228/Ashton Way	4253	4254	1	0.0%	4731	4739	8	0.2%
12. A20/Ashton Way/Castle Way	2628	2625	-3	-0.1%	2776	2803	27	1.0%
13. A20/Winterfield Lane/Lunsford Lane	2315	2305	-10	-0.4%	2630	2625	-6	-0.2%
14. A20/New Road. East Malling	2299	2281	-18	-0.8%	2382	2443	61	2.6%
15. A20/New Hythe Lane	2857	2382	-475	-16.6%	3038	2887	-151	-5.0%
16. A20/New Road/Station Road. Ditton	2282	1778	-504	-22.1%	2378	2070	-308	-12.9%
17. A20/Mills Road/Hall Road	3006	3056	50	1.7%	3576	3630	54	1.5%
18. A20/Coldharbour Roundabout	4933	4960	28	0.6%	5025	5075	50	1.0%
19. A20/St Laurence Avenue	3254	3258	4	0.1%	3453	3465	12	0.4%
20. Station Road/ Hall Road	1406	1972	566	40.3%	1084	1850	766	70.7%
21. Bellingham Way/ Station Road	915	2127	1212	132.5%	731	1733	1002	137.1%
22. Forstal Road, High Street, Aylesford	608	468	-140	-23.0%	679	738	59	8.7%
23. A229/Forstal Road/Sandling Lane (Running Horse Roundabout)	4494	4618	123	2.7%	3477	3791	314	9.0%
24. M20 Junctions 4	5615	5444	-172	-3.1%	6236	5835	-401	-6.4%
25. M20 Junction 5	4263	4163	-100	-2.3%	4016	3962	-54	-1.3%
26. Level crossings at Mill Hall	266	218	-48	-18.0%	375	267	-108	-28.8%
27. Level crossings at Station Road	1260	1502	242	19.2%	965	1420	455	47.2%

10.5 The 27 junctions have been checked against the criteria of 60 vehicles and 3% increase as suggested by the applicant (although not agreed with KCC Highways), not only as a whole but at arm operation level as well.

10.6 Based on the TA assessment, junctions 3-7, 9-19, 22 and 26 have not been modelled. Nevertheless, an interrogation of the turning movements revealed that junctions 3, 7, 9, 12, 14, 17, 18 and 22 experience a disproportionate change in flows on various arms with

changes in turning movements that imply significant increases on certain arms. Assessment of these junction is required.

10.7 For those junctions included, junction capacity assessments are provided comparing the 2031 Do Minimum Visum model + the previous use + Whitepost Field with the same scenario without the previous use and with the redevelopment proposal and Bellingham Way link road.

10.8 It is not clear why the scenarios including Whitepost Field as committed development is not used for both the selection of junctions to assess and the comparison of capacity assessments, given that this is a committed development.

10.9 KCC requested an additional scenario to model the impact of the development including only 175 dwellings at Whitepost Field and no Whitepost Field Relief Road. Traffic flow diagrams are required to show the proposed development generated traffic on the highway network in each peak hour in order to assess whether this scenario is required.

10.10 Limited traffic flows diagrams are provided at Appendix H, but additional diagrams are needed to show each of the data sets and the committed development traffic, the previous use flows and proposed use flows provided separately.

10.11 Also required are the "Do Something + Whitepost Field dev" flows on which the junction assessments are based. A check of the flow input of the assessment models indicated that no additional flows due to committed development were included for the assessed junctions. Respective flow diagrams are required for clarification.

10.12 Flow diagrams provided at Appendix H for the 2031 Do Minimum scenario + committed development do not tally with the flows in the A20 Corridor Junction assessments – do Something Reg 19 Scenario. This needs to be revisited.

11 Model Results

11.1 Before discussing each junction in turn there are some general comments which apply to the assessments as a whole:

11.2 The assessments typically use a flat demand profile for future year scenarios which are not mentioned or discussed within the TA. The use of this demand profile needs to be fully justified where used. Where no justification is provided revised assessments using the standard one-hour profile are needed.

11.3 A number of junctions do not include baseline models to allow sense checking of the models against observed traffic conditions. Forecast models for the Do Minimum scenario are also required at all junctions to demonstrate how the network would operate without the development and proposed link road and provide a relative comparison of impact.

11.4 Final judgement of the assessments will be reserved until the extant use distribution and the justification of the demand profiles used have been approved.

12 Junction Assessments

12.1 **Site Access junctions**

The junctions of the Bellingham Way link road and the access to the industrial units have each been modelled assuming parcel delivery which is a higher trip generator than other employment/industrial uses in order to be robust.

All the junctions operate within capacity, although the year of assessment requires clarification as assessment output files indicate this to be 2020

12.2 **New Hythe Rd/Bellingham Way/Leybourne Way (Jct 1)**

The model assessment indicates that the junction is forecast to operate within capacity, however, as stated above this is based upon a flat demand profile. This should be fully justified or remodelled using the one-hour profile.

The roundabout will see a significant increase in traffic therefore a check should be made on geometric design to ensure it complies with DC116.

12.3 **Papyrus Way/New Hythe Lane (Jct 2)**

Detailed assessment of the junction has been undertaken on the basis of the 2016 baseline flows + development flows. The junction appears to perform well within capacity, however, no growth between 2016 and 2031 has been included and it is based upon a flat demand profile. This should be fully justified or remodelled using the one-hour profile.

12.4 **A228/ Malling Road / Hays Road (Jct 8)**

It is acknowledged that the Visum model was not very detailed at this area and adjustments to flows are accepted in principle. With respect to this junction in particular, further information/clarification with regards to the extant use distribution is required to verify omission of a PM peak model and conclusions drawn at this junction. Also, the junction is not included in any flow diagrams. Again, a flat demand profile has been used which should be justified or remodelled using the one-hour profile.

12.5 **Station Road / Hall Road (Jct 20)**

This junction is a known constraint as existing although the application assessment indicates that the junction is forecast to operate within capacity, however, this is based upon a flat demand profile. This should be fully justified or remodelled using the one-hour profile. This junction as existing is impacted by the level crossing to the north east of the junction. The current application will lead to a significant increase in traffic flows at this junction and therefore an assessment is required of the impact of the crossing on the operation of the junction.

12.6 **Station Road / Bellingham Way Link Road (Jct 21)**

The assessment indicates that the junction will operate over capacity in the AM and at capacity in the PM peak, however, this is based upon a flat demand profile. This should be fully justified or remodelled using the one-hour profile.

The 2031 Do Something + Committed Development scenario predicts an RFC **(* see note 1)** on Station Road (E) turning into the development access, of 1.11 in the AM peak. This would result in traffic queuing onto Station road and blocking ahead traffic. During the PM peak the same movement is predicted to have an RFC of 0.98.

This junction constitutes one of the two main entrances to the development and as such it should operate at an acceptable level of capacity. The conclusion reached that the junction does not require mitigation is not considered acceptable. The reference to the VISUM model catering for this level of demand is misleading as the level of coding within VISUM is crude and hence why local assessments are required.

*Note 1 The maximum ratio of flow to capacity (RFC), which measures the predicted flow of vehicles against the junction capacity based on the junction geometry. It is normally accepted that an RFC of 1.000 indicates that the junction is operating at maximum capacity. Due to the inherent day-to-day variability of traffic flows a RFC value of 0.85 is acceptable in operational terms for development impact assessments.

There is also a safety concern with regards to this non-typical junction arrangement in the context of intensified use.

It is noted that there are no turns to or from Station Road West in the do Something scenario, please clarify how these turning movements will be prevented.

There is predicted to be a significant increase in traffic along Station Road west and therefore a link capacity assessment is needed.

12.7 **A229/Forstal Road/Sandling Lane (Running Horse Roundabout - Jct 23)**

The assessment indicates that the junction will operate over capacity in the AM peak with development flows without any level of growth or committed development and assuming a flat demand profile. Further confirmation is required on the modelling approach. Also, a 2016 observed model output is required.

12.8 **Level crossing (Jct 27)**

The TA states that the queues forming at each cycle of the level crossing when closed (2min and 15 sec each time, 4 times during AM and 3 during PM), will have time to disperse until the next closing. This is not believed to be the case as Station Road constitutes a two-way single carriageway, the free flow theoretical capacity of which is expected to be around 1600. The Do Something 2-way flows are 1502 and 1420 in AM and PM respectively. In particular the AM is very close to theoretical capacity and taking into consideration the overall 9 minutes of lost time, it can be assumed that queuing will go beyond the one hour of peak time. It is also recommended that Network Rail are consulted in operation safety terms of the level crossing. The applicant is proposing to mitigate this impact with the provision of a bus service between the site and Maidstone centre with half-hourly frequency. This may assist however, further measures are required to ensure that the impact of the additional traffic does not have a detrimental impact on safety and capacity along Station Road in Aylesford village and resulting in blocking back and significant queueing along Station Road each side of the level crossing.

13 Mitigation

13.1 The application includes the opening of the Bellingham Way link road which provides an alternative route to the A20 and a package of measures to improve accessibility for pedestrians, cyclists, public transport users is proposed and should be enhanced as outlined above.

13.2 Additional mitigating measures will be required where there is a significant impact on the capacity of the highway network . Whilst additional information and clarification is required as outlined in the review above, the results provided so far clearly show that the junctions of Station Road/Bellingham Way link, A229/Forstal Road/Sandling Lane (Running Horse Roundabout) and Station Road/ Hall Road including the level crossing will require mitigating measures. Other junctions as identified above require capacity assessments in order to conclude whether further mitigation is needed.

14 Travel Plan

14.1 In accordance with the aims and objectives of the National Planning Policy Framework (paragraph 111), all developments which generate significant amounts of transport movement are required to provide a travel plan.

14.2 A Framework Travel Plan and Mobility Strategy has been submitted to provide an ongoing basis for encouraging sustainable travel patterns and reducing vehicle trips. The potential measures and initiatives put forward in the Travel Plan include the provision of employee

travel information packs, active travel corridors, contribution to bus improvements, car club, car pooling, electric charging points, car parking management, bike hire scheme, cycle parking, showers and lockers, bicycle purchase discounts, promotion of car sharing, notice boards and the distribution of newsletters. Implementation will be overseen by a Travel Plan Co-ordinator.

14.3 It is recommended that the proposed shared footway/ cycling provision is upgraded to a separate footway and cycle track where possible. Also, I note that a contribution is proposed for an extension of local bus services to provide an hourly service to Maidstone Centre. Although details are to be agreed with Arriva and KCC Public Transport team, a half hourly service through the site is needed as outlined in the Transport Assessment.

14.4 The Travel Plan targets should seek to achieve at least a 10% reduction in single occupancy car trips by achieving mode share increases in travel by walking, cycling, bus, rail and car sharing. The Travel Plan is to be reviewed and monitored.

14.5 Following written approval of the Travel Plan by KCC the Travel Plan should be registered with KCC Jambusters website (www. jambusterstpms.co.uk). The applicant shall implement and monitor the approved travel plan, and for each subsequent occupation of the development thereafter maintain and develop the travel plan to the satisfaction of the Local Planning Authority.

14.6 Monitoring requirements should only cease when there is sufficient evidence for all parties to be sure that the travel patterns of the development are in line with the objectives of the travel plan. Completed post occupation survey forms from all new dwellings/occupants on the site will be required to be submitted on the final monitoring period. A fee of is required, prior to first occupation of the development, to fund KCC's Travel Plan Advisor to review monitoring reports and work with the Travel Plan Coordinators to achieve the objectives.

15 Conclusions

Additional information and clarification is required in order that I can fully assess the impact of this development proposal on the highway network. Once this information is received I can review and provide additional comments.

Should you wish to discuss or need clarification on this review of the Transport Assessment, pleased do get in touch.

Yours sincerely

Louise Rowlands
Principal Transport & Development Planner

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Tel: 03000 418181
Date: 5 March 2021

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Dear Robin

Thank you for consulting me on the Transport Assessment Addendum (TAA) dated 3 February 2021.

I have reviewed the TAA and my comments are as follows:

1 Accessibility

The applicant has offered an impressive list of sustainable travel improvements. This will be of benefit for the users of the application site and also to other employment centres and residents throughout the area. These include the following:

- Drawing 205236D-C-01 Rev A2 and 205236D-C-02 Rev B shows improved, widened footways along the eastern side of Papyrus Way and extending along the southern side of New Hythe Lane towards New Hythe Station. A safety audit is needed.

- A footway link along the east side of Leybourne Way from New Hythe Lane to tie in with the existing footway is shown on drawing number 205236D-C-03 Rev A and this is as requested. A safety audit is needed.

- A walking and cycling route to Aylesford rail station is shown on drawing number 205236D-C-06 Rev A and including crossings for pedestrians on Bellingham Way and a puffin crossing on Station Road. The crossing on Bellingham Way should be suitable for cyclists use. The carriageway on Station Road should be a minimum width of 6.5m and therefore some highway verge could be used to increase the width of the footway/cycleway whilst maintaining a reasonable carriageway width. The drawing shows that Highways England land falls within the Station Road/Bellingham Way junction and along the northern side of Station Road. Engagement with Highways England to obtain acceptance of the changed layout or land acquisition should take place.

- A walking and cycle route along the Bellingham Way link road is included on drawing number AYL-BWB-GEN-IF-SK-C-0102 Rev P04.

- AYL-BWB-GEN-IF-SK-C-0101 Rev P03 shows the footway cycleway extending along the site access road and into College Road.

- A financial contribution of £250,000 for the upgrade of the existing public footpath along the south side of the River Medway between Mill Hall and Aylesford village has been offered and this is welcome and accepted.

- Enhancement to PRoW MR492, MR493 and MR91 are also agreed.

- A contribution of £30,000 has been offered for bus boarder kerbs and shelters at the Bricklayers Arms bus stop, it would be preferred if this could be provided by way of S278 Agreement.

- A contribution of £25,000 for pedestrian improvements along New Hythe Lane.

- S106 contribution of £3,500 to support the implementation of a TRO to address any parking issues that arise.

- Additional incentives to encourage sustainable travel are as follows:

- Bike hire scheme comprising 36 bikes over 6 bike stations with maintenance and running costs for 5 years. The upfront cost is £180,945 and an additional £38,176 annually for 5 years for maintenance and other associated costs with running the scheme.

- Car club contribution of £50,000 to fund the provision of 1 car club vehicle at year 1 and 2 vehicles at years 2 and 3. All business provided with free car club membership for their employees and 1 year's free personal membership to all employees.

- Car Pooling contribution and provision of car share parking spaces.

- Charging points for electric vehicles at 10% across the site and 100% passive provision.

- Car Park Management Plan

- Cycle parking is proposed for 230 cycles with a commitment to provide additional spaces should they be required. The cycle parking provision is to be monitored annually through the Travel Plan.

- A contribution towards bus service enhancements is proposed based on an extension of a local bus service connecting the site with Maidstone on a half hourly frequency at a cost of £664,460. This is welcomed subject to it being a general contribution to public transport (likely to involve the extension / enhancement of existing routes). This will allow flexibility on its deployment depending both on the employee make up at the and the status of the commercial network at the time.

- The commitment to provide these contributions is welcomed and whilst S106 contributions are appropriate for the PRoW improvements, the bus contribution and some sustainable travel initiatives, the works within the highway should be completed via S278 Agreement. This would include footways/cycleways and bus stop improvements.

Note: All work within the highway requires a safety audit.

2 Vehicular Access Strategy

Drawings of the Bellingham Way link road have been updated to take into account the comments raised in the previous response by KCC Highways. I can confirm that a design in accordance with the Kent Design Guide, Local Distributor Road is acceptable. A Designer's Response to the safety audit is provided at Appendix C of the TAA. The comments can be addressed in the detailed design. A signing strategy will be provided to ensure HGVs are directed towards Bellingham Way and not towards Papyrus Way or Station Road. Consideration should be given to the mandatory use of the HGV route and speed trackers for all tenants of the development site. A signing strategy should also be a condition of any planning consent.

Third-party Traffic Regulation Orders (TROs) are required in order for the applicant to pursue a weight limit, parking controls in the HGV turning area, no right turn order from the HGV turning area and no entry on the exit only lane from the HGV turning area.

Where a stopping up order is needed for redundant sections of highway, this should be pursued by the applicant through the Town and Country Planning Act.

3 Parking

It is agreed that an appropriate condition can be provided to review the parking provision should units 6 and 7 be used for B1 or B2 use and not B8 use subject to the approval of TMBC.

Measures will be included in the travel plan to encourage car sharing and reduce single occupancy car trips.

The level of cycle spaces proposed is significantly less that that recommended in SPG4. The applicant indicates a commitment to increase cycle parking if needed and this will be a condition included in the Travel Plan through which this will be monitored.

4 Crashes

Additional information is provided and no particular problems are identified requiring action by the applicant.

5 Trip Rates

An explanation of the methodology used to calculate the modal trip generation for staff trips has been provided and the use of census travel to work data is agreed.

6 Traffic distribution

The traffic distribution queries previously raised are addressed.

7 Growth

Junctions have been assessed for the 2031 future year and so the concern previously raised is adequately addressed.

8 Impact

The TAA includes further analysis of the net impact of traffic at additional junctions as requested and including:

Bellingham Way/New Hythe Lane/Leybourne Way

Modelling indicates that the junction is within capacity in the Do Something 2031 scenario.

An additional safety review has been completed as requested and no road safety problems were identified. To address concerns regarding safety the applicant has produced an improvement scheme to provide additional white lining at the roundabout. This is shown on drawing number 205236D-A-07. The geometry of the improved roundabout has been checked against standards and found to be compliant. it is noted that the visibility on the approach to the roundabout on Bellingham Way is compliant with manual for streets for a 30mph speed limit. It would be helpful if measures could be provided on this approach to the roundabout to ensure speed are 30mph or less. A controlled crossing facility between Abery Drive and the

roundabout is recommended.

Papyrus Way/New Hythe Lane

The junction has been remodelled using a one-hour profile and including growth to 2031. No capacity issues have been identified.

Leybourne Way/Tesco access

The junction is expected to see a small increase in traffic flows during the AM peak. A capacity assessment has been completed and the junction has sufficient capacity to accommodate the additional vehicles in the AM peak period.

A20/Malling Road/Hays Road no significant impact

A228/Peters Bridge is expected to see a significant reduction in traffic flows in both peak periods and therefore a capacity assessment is not required.

A20/Ashton Way/Castle Way

This junction is expected to see a net reduction is traffic in the AM peak and a small increase in the PM peak (23 vehicles) This increase is not considered significant for a junction of this size and therefore additional modelling is not required.

Leybourne Way/Lunsford Lane

Table 9 Appendix G shows a significant net reduction in traffic flow at the junction so additional modelling is not required.

A20/New Road

Although there is expected to be an increase in traffic of 60 vehicles in the PM peak this junction is subject to improvement via S278 works associated with the Parkside development proposal at East Malling. The junction improvement was modelled with the Aylesford Newsprint development included and assuming the higher level of traffic generation used for the Local Plan assessment.

A20/Mills Road/Hall Road

Junction improvement schemes are programmed to commence summer 2021 with completion expected approximately 12 months later. The junction improvement has been modelled to include traffic generated from the redevelopment of the Aylesford Newsprint development. The redevelopment of Aylesford Newsprint is expected to generate an additional 50 traffic movements in the AM peak and 54 in the PM peak at this junction. A condition to restrict development prior to the completion of the works is not required as the opening of the Bellingham Way link will allow improved highway resilience, and this will outway the disbenefit of the additional traffic movements.

A20 Coldharbour Roundabout

The development is expected to generate an additional 28 traffic movements in the AM peak and 52 in the PM peak. Work on the improvement scheme is expected to start spring 2021. The improvements have been modelled to include the Aylesford Newsprint development. A condition to restrict development prior to the completion of the works is not required as the opening of the Bellingham Way link will allow improved highway resilience, and this will outway the disbenefit of the additional traffic movements.

A20/ St Laurence Avenue

The increase in traffic arising from the development is minimal; 4 traffic movements in the AM peak and 12 in the PM peak.

Station Road/ Hall Road the capacity assessment indicates the junction operates within capacity in the Do Something 2031 scenario

Station Road / Bellingham Way

An improvement scheme is required to mitigate the impact of the application traffic and a traffic signalised junction arrangement has been put forward as shown in principle on drawing numbers 205236/A/010 Rev B dated 16.7.20, AYL-BWB-HML-IF-DR-C-0103 Rev P3 and AYL-BWB-GEN-IF-SK-C-0121 Rev P1. The scheme offers improvements to capacity and includes signalised pedestrian crossings on Bellingham Way and Station Road adjacent to Aylesford Station access. The improvement scheme is forecast to operate within capacity in both peak periods.

Additional information is required with regard the proposed improvement scheme and this has already been fed to the applicant:

Modifications are required to the design to address comments from KCC ITS Engineer, a technical note relating to the proposed departures from standards and a stage 1 safety audit. Also, the TAA indicates that the junction includes land owned by Highways England and so the applicant is required to seek permission from Highways England to allow the improvements to be delivered.

Forstal Road/High Street, Aylesford

The application is expected to reduce traffic through the junction by 140 vehicles in the AM peak and increase by 59 in the PM peak. Following concerns regarding the capacity of the junction an assessment was completed and included in Technical Note 205236 'Highways England Response' . The junction is forecast to operate within capacity in 2031 in the Do something scenario.

A229/Forstal Road/Sandling Lane – Running Horse Roundabout

The TAA provides additional information and corrections to the capacity assessment for the Running Horse roundabout following concerns raised regarding capacity. Due to the extensive package of sustainable transport incentives proposed by the applicant KCC Highways have agreed that a sensitivity test allowing for a 10% reduction of development traffic flows. The applicant has also completed an additional sensitivity test allowing a 10% reduction in background traffic due to the modal shift expected resulting for the sustainable travel measures offered.

Table 3: Do Minimum 2031 Running Horse Roundabout Assessment

	AM Peak Hour			PM Peak Hour		
	RFC	Queue	Delay	RFC	Queue	Delay
A229 N	0.96	22.3	41.30	0.57	1.3	3.71
Sandling Lane	0.49	0.9	8.09	0.23	0.3	2.07
A229 S	0.92	10.3	39.08	0.48	0.9	3.96
Forstal Road	0.42	0.7	6.84	0.37	0.6	4.40
M20	0.56	1.3	3.98	0.51	1.0	3.97

Table 5: Do Something plus WPF 2031 Running Horse Roundabout – 10% Discount to Development Traffic

	AM Peak Hour			PM Peak Hour		
	RFC	Queue	Delay	RFC	Queue	Delay
A229 N	1.00	52.7	92.74	0.84	1.7	4.84
Sandling Lane	0.51	1.0	8.71	0.25	0.3	3.36
A229 S	0.96	17.1	64.65	0.53	1.1	4.74
Forstal Road	0.44	0.8	6.50	0.37	0.6	4.37
M20	0.57	1.3	4.06	0.65	1.7	5.40

It can be seen from Tables 3 and 5 taken from the TAA that the A229 north and A229 south arms of the junction are expected to operate over desirable capacity in 2031 in the Do Minimum scenario during the peak hours with an RFC of 0.96 and 0.92 respectively. In the Do Something scenario with 10 % reduction in development traffic as agreed with KCC, the A229 reaches an RFC of 1.0 in the AM peak with an additional 30 vehicles added to the queue and the A229 south has an RFC of 0.96 in the AM peak and 7 additional vehicles added to the queue. It should be noted that the Do Minimum flows do not include traffic associated with the extant use of the development site which can be used to offset the development traffic generation as agreed with TMBC. The difference between the Do Something and Do Minimum scenarios is therefore greater than it would be if this had been taken into consideration.

The additional sensitivity test completed by the applicant allows a 10% reduction to the background traffic as well as the development traffic. Although this scenario was not suggested by KCC Highways the results are of interest and indicate that the junction would operate within capacity with minimal queues and delays on all arms.

A20/Hermitage Lane

The junction was not included in the modelling set out in the TA and so Appendix L of the TAA includes a technical note relating specifically to this junction.

The junction of A20/Hermitage Lane will be effectively mitigated by the provision of the Whitepost Field link, a link road between Hermitage Lane and the Poppyfields Roundabout on the A20. The new link road will provide an additional alternative route to the M20 junction 5 and also towards Maidstone, hence relieving the A20/Hermitage Lane junction. The link road was

included in the Whitepost Field planning application TM/17/01595 for 840 homes. The application has received planning consent and therefore the scheme can be regarded as committed. However, the trigger for the completion of the link road is 175 homes or 5 years whichever is the sooner. KCC Highways have requested that an assessment be completed of the impact of the redevelopment of the Aylesford Newsprint site at the A20/Hermitage Lane junction prior to the completion of the link road.

The development traffic through the junction was not included in the Visum flow outputs and so it has been estimated using the flows to and from the next junction to the east Coldharbour Roundabout. A check on the traffic flows used suggests that they are higher that the Visum outputs. Flows have been taken from the Do Minimum scenario for the Coldharbour Roundabout and subtracted from the Do Something scenario to provide the development flows. I have checked the flows used against the Visum output data and also the distribution diagrams for both Coldharbour Roundabout and A20/Mills Road/Hall Road junction and I calculate a different resultant flow through the A20/Hermitage Lane junction which is significantly less than that shown at Appendix L. Also, it should be noted that there is a weight restriction along Hermitage Lane and therefore the HGV factor for development traffic could be removed from this arm.

The Background flows through the junction are taken from the 2019 Visum report prepared for evidence for the draft Local Plan and growthed to 2031. The do Minimum flows do not include traffic associated with the extant use of the development site which can be used to offset the development traffic generation as agreed with TMBC. The difference between the Do Something and Do Minimum scenarios is therefore greater than it would be if this had been taken into consideration, this is reflected in the capacity assessments which show the junction will be over capacity in the 2031 Do Minimum scenario and even more so in the Do Something scenario.

Tables are provided in Appendix L of the TAA but unfortunately the junction arms are not labelled. Looking at the proportions of traffic movements through the junction it is apparent that the junction arms are as follows:

A Preston Hall

B A20 east

C Hermitage Lane

D A20 west

The assessment provided in Appendix L shows that the Do Something scenarios do lead to additional queueing and delays which is minimal on some arms but quite significant on others.

An assessment which includes the traffic associated with the extant use of the Aylesford Newsprint site in the Do Minimum scenario and a review of the development trips through the junction has been recommended in order that a fair comparison of results can be made as this is likely to result in a reduced impact.

This request for additional information has already been fed to the applicant and addressed in Technical Note 205236 titled A20/Hermitage Lane Junction dated March 2021. The revised traffic flows are modelled with 175 homes from Whitepost Field and no link road for both the 2031 Do Minimum and Do Something scenarios. The results show an increase in queue lengths on some arms, but this is not considered to be severe.

JN 27 Level crossing

The level crossing already causes queues in each direction along Station Road. It is clear that the additional traffic generated by this application will worsen this situation, however this cannot reasonably be mitigated by this application.

Site Access junctions

All site access junctions operate within capacity in the 2031 scenario.

Station Road Link capacity assessment

The assessment has been provided which indicates spare capacity on Station Road

Larkfield Local Roads

A 20mph speed limit is being pursued for the local roads in the Larkfield area to enhance safety. Whilst the traffic distribution analysis indicates that the development traffic will mostly use the main distributor routes, such as Leybourne Way towards the A228 and onwards to the M20 Jn4, it is likely that some trips will take the routes through the existing residential areas in Larkfield, particularly when there are incidents or hold-ups along Leybourne Way. With this in mind it would be helpful if this development could support the scheme currently being developed and contribute to or implement measures to enhance the speed limits on the local roads in the Larkfield area in order to complement and enhance the speed limits.

9 Mitigation

The improvements to sustainable transport modes are welcome and will allow choice of travel for employees travelling to and from work, both existing premises and those proposed, and local residents. The opening of the Bellingham Way link road will provide an alternative route to the A20 to the benefit of highway resilience leading to a reduction in traffic movements on many links but an increase on others. Impact assessments have been completed for a number of junctions and the results indicate that for the majority, the application will not have any detrimental impact on capacity or safety. Mitigating measures are required for the junction of Station Road/Bellingham Way. The applicant has produced a drawing showing a proposal for traffic signals at the junction and pedestrian facilities on Station Road, near to the station, and on Bellingham Way. Further work is needed to show that such a scheme can be delivered safely.

10 Conclusions

The TAA has provided additional information which has clarified many points and addressed many concerns previously raised and this is greatly appreciated. There are however some areas where additional information is needed as set out above and included below:

- Station Road/Bellingham Way junction improvement scheme
- A controlled crossing facility on Bellingham Way between Abery Drive and the roundabout junction of Bellingham Way/New Hythe Lane/Leybourne Way is required.
- Measures to enhance the speed limits on local roads in the Larkfield area to complement and enhance the speed limits.
- Safety audits for all works within the highway.

Once this information is available and reviewed I shall be able to provide further comments. Should the Local Planning Authority wish to determine the application in the meantime, please contact me for a list of conditions.

INFORMATIVE: It is the responsibility of the applicant to ensure, before any development 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