



**Tonbridge & Malling Borough Council**

**Highways and Transportation**

Ashford Highway Depot

4 Javelin Way

Ashford

TN24 8AD

**Tel:** 03000 418181

**Date:** 18 February 2019

**Application - TM/19/00014/OAEA**

**Location - Land North Of Lower Haysden Lane, Tonbridge, Kent**

**Proposal - Outline Application: The construction of up to 125 new homes, a 2 form entry primary school, the formation of new means of access onto Lower Haysden Lane, new pedestrian and cycle links (including links to the existing playing fields and Country Park to the west), the laying out of open space, new strategic landscaping, habitat creation, drainage features and associated ground works and infrastructure.**

Matthew,

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

### **Introduction**

It is noted that this application seeks permission for the construction of up to 125 homes and 2 form entry primary school, as well as a new means of access onto Lower Haysden Lane with new pedestrian and cycle links.

This application includes a Transport Assessment (*TA*), which has been informed by some pre-application discussions with Kent County Council (*KCC*) Highways. In addition to the *TA* a draft travel plan (*TP*) has also been submitted.

It is acknowledged that the site has been allocated for a development of up to 480 dwellings, a new 2 form entry primary school and health care provision (*TMBC SHLA reference: LP31*) in the emerging Local Plan.

### **Site Access**

The applicant has proposed to amend the existing access arrangements onto Upper Haysden Lane/Brook Street. Essentially, the existing junction format will stay the same with a two-way priority junction arrangement retained, as well as the one-way/exit only arm onto Brook Street. Amendments that the applicant is putting forward include the introduction of a ghosted right turn lane and realignment of the carriageway to suit the alignment of the development's access road. In order to assist pedestrians whilst crossing the revised junction arrangements several improvements are also proposed, these include the introduction of new footways and

pedestrian refuse islands. The access arrangements are shown on the drawing titled '*Proposed Access Arrangement*,' drawing number '10246-HL-01.'

Having reviewed the submitted access drawing and undertaken a site visit it appears that the proposals have been overlaid on an Ordnance Survey base map. KCC Highways have recently undertaken a footway improvement scheme within the vicinity of Lower Haysden Lane linking Judd School with its off-site playing fields. These works involved the narrowing of the carriageway within the immediate vicinity of the existing access arrangements. It is unclear if the applicant has taken this into account in the access arrangements proposed. As a result, the access arrangements require overlaying on a recent topographical survey to ensure that they can be achieved in accordance with the technical specification's stipulated in Design Manual for Roads and Bridges (DMRB) Technical Directive (TD 42/95), without adversely impacting on the recently implemented footway improvements. An additional or amended drawing is also required demonstrating forward visibility on the approach to the proposed right-hand turn lane and uncontrolled dropped kerb crossing point.

In respect of the eastern exit only arm of the proposed access arrangements it appears that the alignment encourages left turning vehicles to approach the junction at an oblique angle, meaning that road users may have to look over their shoulder when turning out of the junction. As a result, the applicant should re-examine the access proposals to determine if a smoother alignment is possible in order to ensure that left turning vehicles are positioned perpendicular to Brook Street, prior to undertaking the left turn.

No independent stage 1 road safety audit of the access arrangements or corresponding designer's response has been provided for review by this authority. This is an important piece of work that requires undertaking, if not already done so.

The proposed emergency access arrangements have not been illustrated on any of the submitted plans/ drawings. An emergency access is required in accordance with the guidance for a major access road that is contained in the Kent Design Guide. Consultation is also strongly recommended with Kent Fire and Rescue Service (KFRS) to determine the suitability of the access arrangements for their requirements.

Finally, no swept path analysis has been provided to illustrate the adequacy of the access arrangements for the largest vehicle that will require access to it. In this instance it will be a 11-meter-long refuse freighter. Swept path analysis is required and should be submitted for review by this authority.

## **Sustainable Travel**

### **Walking and Cycling**

The TA provides an overview of how the site is situated within close proximity of a range of local facilities. Some nearby facilities include the Lidl supermarket, Foresters Arms and takeaways located on the B2260 and the Judd School, West Kent College and Hayesbrook school situated on Brook Street, all of which are situated within the preferred maximum walking distance of 1.2 kilometres quoted in '*Providing for Journeys on Foot*.' These facilities can be accessed via the existing shared foot and cycle way provision. Tonbridge train station, which provides services to a range of local and regional destinations is also within the preferred maximum walking distance of 2km. - (*Guidelines for Providing for Journeys on Foot, The Institution of Highways and Transportation, 2000*)

2-meter-wide footways abutting the development's access road and the realigned junction arrangement onto Upper Haysden Lane/Brook Street have been proposed by the applicant. In

addition, two uncontrolled dropped kerb crossing points with pedestrian refuse islands are proposed in association with the footways fronting Brook Street/Upper Haysden Lane. This provision will allow onward connections to the existing shared foot/cycleway on the south side of Brook Street and controlled crossing facilities situated further east on Brook Street, as well as Tonbridge town centre itself.

The footway that is proposed on Lower Haysden Lane terminates short of Haysden Country Park. In the interest of promoting sustainable modes of transport the applicant should be required to investigate the feasibility of extending the footway to link with the country park.

Paragraph 4.17 of the applicant's TA advises that there are no Public Rights of Way (*PROW*) within the immediate proximity of the development site. This is incorrect as *PROW* routes 0309/MU29/1 and 0309/MU43/1 are situated approximately 200 meters east of the development site and provide a direct route to Tonbridge train station via Douglas and Waterloo Road. To promote sustainable modes of transport the applicant should be required to investigate the feasibility of developing a link with the *PROW* route via their site. If not already undertaken, then consultation is also recommended with KCC's *PROW* team.

Details of the current modal travel to work split have been provided in section 4 of the applicant's TA. This breakdown is based on the '*Medway*' ward area, which is incorrect as the proposals are in fact situated in *the 'Judd'* ward area. The applicant should review this and provide modal split data for the correct ward area.

## **Public Transport**

The nearest public bus stop to the site is situated on Brook Street outside Hayesbrook School. As well as providing a stop for services associated with the school this stop serves Arriva service 211 which provides a Monday to Saturday off peak service between Cottage Hospital and Barden Park. The applicant should be required to investigate the feasibility of providing sheltered waiting facilities at this location.

Although the stops situated on the A26, south and north of the Brook Street roundabout do provide more frequent services, as well as to a range of further afield destinations such as Tunbridge Wells and Sevenoaks, they are beyond the maximum recommend distance of 400 meters. -(*Guidelines for Planning for Public Transport in Developments, 1999*). However, these are still within the maximum desirable walking distance of 1.2 kilometres.

## **Travel Plan**

Finally, in addition to the submitted TA a draft TP has also been provided. This plan aims to achieve an ambitious 10% modal shift to sustainable modes of transport. The applicant proposes to undertake baseline surveys with the development's new occupants, which will be followed by annual surveys upon the anniversary of the 50<sup>th</sup> occupation for a 5-year period. A travel plan coordinator will be employed by the developer for the 5-year period, with the applicant proposing that the travel plan responsibilities will fall to a residents' steering group after this period.

Measures to encourage modal shift have been outlined in the TP, with much focus given to the promotion of sustainable transport via resident welcome packs for example, which will include information such as maps illustrating local bus, cycle and pedestrian routes. In addition, it is proposed to promote various sustainable transport user groups including a bicycle user group, bus buddy scheme and the County Council's car share scheme ([www.liftshare.com.uk/community/kent](http://www.liftshare.com.uk/community/kent)). It is proposed to promote these measures via a

dedicated travel website, as well as promotional leaflets, which will be the responsibility of the appointed Travel Plan Co-ordinator.

Should the proposals be granted consent then the applicant must register the plan with KCC's Jambusters website ([www.jambusterstpms.co.uk](http://www.jambusterstpms.co.uk)), prior to the first occupation of the development. A fee of £5,000 is required in order to fund the County Council's Travel Plan Co-ordinator who will work with the development's appointed co-ordinator, in helping to achieve the objectives of the Travel Plan. This should be secured via a S106 agreement.

The draft travel plan also refers to the fact that the Travel Plan Co-ordinator for the residential element of the proposals will assist the proposed school's appointed Travel Plan Co-ordinator in developing a school travel plan (paragraph 6.5). A separate travel plan monitoring fee will also be required, which should be secured via a S106 agreement.

### **Trip Generation**

The vehicle trip rates that underpin the forecasts for the residential element of the development have been derived through TRICS, the National Trip Generation database. It is anticipated that the residential element of the development will generate 0.486 two-way movements per dwelling in the AM peak (08:00-09:00) and 0.483 two-way movements per dwelling in the PM peak (17:00-18:00). These results have been sense checked and are considered to provide a robust basis for assessment.

Unfortunately, the TRICS outputs for the proposed two-form entry primary school and health centre element of the proposals have not been provided for review and validation by this authority. This information is required. It is important that these are agreed as any changes to them will impact on the results of the highway capacity assessments that have been undertaken.

No details of the proposed health care centre in respect of its total proposed gross floor area (GFA) have been included within the applicant's supporting information. These are also required.

As highlighted in paragraph 1.5 of the applicant's TA an adjustment has been made to the forecast trips associated with the 2-form entry primary school element of the proposals based upon census data. This is to account for the children who will attend the primary school but are anticipated to reside within the residential element of the proposals and will therefore not use the wider local highway network whilst travelling to school (*internalisation*). There are two middle census super output areas (*Tonbridge and Malling 012 and 013*) and several lower super output areas within the immediate proximity of the proposals, however, no clarity has been provided on the census area utilised by the applicant. In addition, the applicant appears to have carried this adjustment through in the up to 125 residential dwellings and 2 form primary entry school scenario, which is misleading, as this assumption is reliant on the remaining section of the site allocation being implemented.

### **Trip Distribution**

No explanation of the methodology used to distribute the trips associated with either the residential or two form entry primary school element of the proposals has been provided. It is also unclear if the applicant has applied the same methodology for both aspects of the proposals. If so, this will not be appropriate as the travel patterns and therefore distribution of traffic associated with each element of the proposals will be different. Consequently, until

further clarity on the applicant's distribution methodology has been provided firm conclusions cannot be drawn on the validity of the resulting highway capacity assessments undertaken.

Should the anticipated catchment area of the new primary school provision be unknown at this stage, then it would be beneficial to contact KCC's Education Department to obtain information on anticipated future demand for the south east Tonbridge area.

### **Growth Rates**

Paragraph 8.8 of the applicant's TA suggests that Temprow growth rates have been applied to baseline traffic flows to account for forecast background growth, in accordance with industry standard practice. However, no details on the specific growth rate or Temprow output area applied have been provided. I would therefore be grateful if the applicant could provide this information.

### **Traffic Impact**

To quantify the anticipated impact of the proposals on the local highway network several junction capacity assessments have been undertaken. Fundamentally, any capacity assessment is founded on traffic surveys, which should be no older than 3 years to ensure that they are representative of baseline traffic conditions. No confirmation of when the traffic surveys were undertaken has been provided by the applicant. In addition, the raw survey data has not been appended to the TA. Therefore, confirmation on when the traffic surveys in question were undertaken is required

It is also standard practice for queue length surveys to be undertaken at the same time as the manual classified turning counts (*MCTC*), which inform the baseline highway capacity assessments. Having reviewed the TA, I can find no evidence of any such surveys. These surveys are important because they validate the results from the baseline highway capacity assessments. If not already undertaken, then these are required. Any new traffic surveys must be undertaken in a '*neutral month*' in accordance with the guidance in the DMRB.

Highway capacity assessments have been undertaken by the applicant at the following junctions: site access junction with Brook Street/Upper Haysden Lane, Brook Street junction with A26 (roundabout junction) and A26 junction with A2014 Pembury Road and B2260 (roundabout junction). At all the junctions where capacity assessments have been undertaken the following scenarios have been modelled: 2031 with background growth, 2031 with background growth and a development of 125 units, 2031 with background growth a development of 100 units and 2 form entry primary and a 2031 with the full Local Plan site allocation. Further commentary on the results of these capacity assessments is provided in the following paragraphs.

### **Site Access**

The results of the junction assessment undertaken at this junction indicates that the junction will operate in capacity with minimal queuing on all arms in both the AM and PM peak periods. As discussed earlier in this consultation response KCC Highways have some concerns over the deliverability of the access arrangements, based upon the information currently submitted.

It should be noted that the junction capacity assessment results presented in the TA are based upon the access arrangements as proposed. Consequently, if it was to be found that the access arrangements were undeliverable and the provision of a ghosted right turn lane not possible, a less favourable set of results may be produced. As a result, it is not considered that

robust conclusions can be drawn from the results of the applicant's capacity assessment, until the outstanding information relating to the proposed access arrangements has been provided.

In addition, it is unclear if the impact of any blocking back from the left-hand exit only access onto Brook Street has been accounted for in the capacity analysis undertaken. It would therefore be prudent for the applicant to contact the Transport Research Laboratory (*TRL*) in order to obtain confirmation on if such a junction arrangement can be accounted for within the parameters of the Picady software.

### **Ensfield Road junction with Upper Haysden Lane**

KCC Highways did not request that this junction was included within the scope of the TA during preliminary scoping discussions. None the less, it is accepted that the capacity analysis undertaken demonstrates that the junction will continue to operate within capacity in all development scenarios. However, KCC Highways would refrain from drawing firm conclusions on the robustness of the assessment undertaken until the outstanding information requested has been provided for review by this authority.

### **Brook Street junction with A26 (Brook Street roundabout)**

The results of the junction assessment undertaken at this junction by the applicant indicate that the junction will operate in capacity with minimal queuing, even with the full development allocation, in the year 2031.

A TA was also commissioned by Tonbridge and Malling Borough Council (*TMBC*) in support of the emerging Local Plan, which has now been submitted for examination in public. Details of the commissioned TA can be found via this link:

<https://www.tmbc.gov.uk/services/planning-and-development/planning/planning-local-plans/local-plan-evidence>. The results of this TA contradict the applicant's capacity assessments, in that significant capacity issues on all arms of the roundabout are identified in 2031 with the development strategy contained in the emerging Local Plan.

As highlighted within this consultation response there are several areas where information has been omitted that has a direct impact upon the capacity assessments undertaken.

Consequently, it is not considered that firm conclusions can be drawn on the validity of the capacity assessments contained within the submitted TA.

### **A26 junction with A2014 Pembury Road and B2260 (Pembury Road roundabout)**

The results of the junction assessment undertaken by the applicant indicate that the junction will operate over capacity in the AM peak period (08:00-09:00) with significant queuing on the A26, Quarry Hill Road southern arm. In the 2031 scenario with the full Local Plan development strategy a queue length of 214 vehicles is indicated, which equates to approximately 1.2 kilometres and would lead to blocking back to the Brook Street roundabout and beyond.

An improvement scheme is described in the applicant's TA (*paragraph 9.27*), however, the model outputs have not been submitted, no drawing illustrating the improvements has been provided or required stage 1 independent road safety audit and corresponding designer's response. KCC Highways do not therefore support the applicant's current conclusion that the impact of the proposals is '*negligible*.' Once the additional information required has been provided and impact on the junction confirmed KCC Highways will review what reasonable level of mitigation the applicant should be required to provide.

## **B2260 junction with Barden Road and Vale Road (Vale Road roundabout)**

This junction has not been included within the scope of the applicant's TA. Once the omitted trip generation figures have been provided and distribution methodology agreed with this authority, KCC Highways will further review if the scope of the assessment requires extending to cover this junction also.

Any revised capacity assessments that are undertaken by the applicant should continue to include the outstanding residential dwellings and health care provision associated within the emerging Local Plans wider site allocation to ensure a robust assessment.

Section 4 of the submitted TA provides a review of the personal injury collision record for the proximity of the proposals for the 5-year period between 1<sup>st</sup> July 2001 and 30<sup>th</sup> June 2016. This is out of date and more recent personal injury collision data is available. Consequently, the applicant should contact Kent County Council Highway's Transport Intelligence Team (<https://www.kent.gov.uk/roads-and-travel/road-safety/crash-and-casualty-data>), to obtain the most up to date information.

### **Summary**

There are several areas where important information has either been omitted by the applicant or further clarification is required. This information is required before the position of the local highway authority can be finalised.

Once the applicant has provided the additional information requested, I will provide further highway-based comments, however, if I can be of any further assistance in the interim period, then please do not hesitate to contact me.

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

**Tom Harris**  
Development Planner