



Tonbridge & Malling Borough Council

Highways and Transportation

Ashford Highway Depot

4 Javelin Way

Ashford

TN24 8AD

Tel: 03000 418181

Date: 11 June 2021

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.

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

This response should be read in conjunction with this authority's previous consultation responses dated 18th February 2019, 1st April 2020, 10th August 2020 and 16th October 2020.

Kent County Council (KCC) Highways has continually raised objections to the development, owing to its 'severe,' impact on traffic congestion and capacity, and the inability of the applicant to identify mitigating measures that would adequately mitigate the impact of the development.

The applicant has previously proposed minor amendments to the Brook Street and Pembury Road roundabout. The amendments involved the extremely limited widening of the entry widths on some arms at both these junctions.

Whilst the applicant contends that these measures would theoretically mitigate the impact of the development, KCC Highways do not consider that amendments would provide any demonstrable benefit in practice.

Consequently, the applicant has reassessed their mitigating measures and is now proposing a set of mitigating measures that aim to encourage travel by sustainable modes. KCC Highways latest comments are therefore considered in this context and the significant weight that the National Planning Policy Framework (NPPF) affords to matters of sustainable development and promoting the use of sustainable modes of transport.

A26/B2260 Railway Approach Corridor (Brook Street roundabout to Vale/Tonbridge High Street Roundabout junction)

The applicant's Transport Assessment (TA) demonstrates how in the absence of intervention the development will unacceptably exacerbate the significant levels of congestion that are known to be prevalent on this section of the highway network.

In the absence of mitigation the impact of the development is most pronounced at Brook Streets junction with the A26 on the Brook Street arm. This arm of the junction will have to accommodate an additional 61 car trips during the peak hours, as consequence of all the development traffic turning left out of the development onto Upper Haysden Lane.

During the AM peak hour the queue is anticipated to increase by 29 vehicles with delays also increased by over 2 minutes. The already significant levels of congestion on the other arms of the junction are also further exacerbated as a consequence of the development.

Because of the traffic generated by the development dispersing across the highway network, the development's impact is much less pronounced and therefore less significant at other locations along the corridor. This is most evident at Vale Roads junction with Tonbridge High Street where 14 vehicle trips are expected to pass through the junction during the peak hour periods. Given the strategic and heavily trafficked nature of the corridor such levels of additional vehicle trips will likely be within the daily variations of traffic flows.

The applicant's traffic generation forecasts assume that all the dwellings within the development will be privately owned; however, it is understood that the development will include an element of affordable housing. Affordable/social housing is known to generate less traffic than privately owned housing. This adds an element of robustness to the applicant's assessment.

Given the limited potential for physical junction improvements along this section of corridor, due to the extent of the existing highway boundary, the applicant has now proposed mitigating measures in the form of improvements to sustainable transport rather than junction capacity improvements.

The measures put forward by the applicant aim to discourage single occupant vehicle trips and encourage trips by sustainable modes. It is therefore imperative that the mitigations proposed are implemented at an early stage to establish sustainable travel behaviours.

This approach is consistent with paragraphs 108a and 110a of the NPPF, which confirm that first and foremost opportunities for the use of sustainable modes of transport should be enhanced and promoted.

Notes

Paragraph 108a of the NPPF states: *In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

Paragraph 110a of the NPPF states: *Within this context, applications for development should:*

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

The location of the development on the edge of Tonbridge town centre and close to good rail and bus interchanges affords opportunities to promote the use of sustainable modes of transport by occupants of the development, as well as existing highway users. A cycle improvement scheme has been put forward by the applicant. The scheme covers the missing link between Brook Street and Tonbridge train station, which traverses along Waterloo Road.

Importantly, the implementation of this scheme will complete the route and provide a continuous shared off-road route between the development site and Tonbridge train station; therefore, providing complete off-road route connectivity. This offers the potential for an increased level of multi-modal end to end trips.

Completion of a complete off-road route also has the potential to encourage wider modal shift and a reduction in background traffic levels, as well as a reducing the volume of vehicular trips generated by the development. Should any wider modal shift occur then it would also be beneficial in helping to improve conditions on this corridor.

An independent stage 1 road safety audit (*RSA*) and corresponding designer's response has been provided by the applicant. Whilst the applicant has satisfactorily addressed the auditor's comments, KCC Highways consider that the existing steps that abut the route should be removed, and the additional width provided as suggested by the auditor. This would have benefits in that it would remove an existing safety hazard and ensure optimum route width for its duration.

As the improvements are required to mitigate the impact of the development the works should be secured via a S278 agreement with this authority. Delivery of the proposed mitigating measures via a S278 agreement will ensure timely delivery, prior to the impact of the development being realised on the highway network.

In addition, KCC Highways require the imposition of a condition preventing the occupation of the development until the works have been implemented. This will prevent the otherwise serve impacts of the development in traffic capacity terms from occurring.

To ensure a robust set of measures that will meaningfully mitigate the impact of the development, the applicant should also be required to provide a car club scheme. This should be additional to the sustainable transport vouchers proposed.

A financial contribution towards such measures should be secured via a S106 agreement. KCC Highways consider that the level of contribution should allow membership to the car club for every household for a minimum of 1 year. The location of the car club parking spaces required for such an incentive would be considered as part of a future reserved matters application (s), should the development receive permission.

Finally, KCC Highways will also require a fee of £948 towards the cost of monitoring the framework travel plan and liaison with the developer's appointed travel plan coordinator.

KCC Highways have developed a transport model covering this section of the network to better understand the reasons for the significant levels of congestion that are known to be prevalent.

Whilst the model requires further refinement it could be used to investigate if the remaining growth proposed in South West Tonbridge as part of the emerging Local Plan can come forward, without any unacceptable highway impacts. The model could also be used to identify the potential for more strategic transport network improvements across the network, as well as to investigate the adequacy of any measure proposed to mitigate the impact of further development in South West Tonbridge.

Summary and Recommendation

The applicant's TA demonstrates how the A26/B2260 corridor is already suffering from significant levels of congestion. This congestion is further exacerbated in the future year assessed, with the addition of the development traffic 'severely,' impacting upon conditions on the local highway network. Consequently, in the absence of appropriate and robust mitigating measures KCC Highways consider the impact of the development upon congestion to be 'severe.'

Commensurate with the aims and objectives of NPPF and in line with emerging Government transport policies the applicant has reassessed their mitigating measures and proposed a series of mitigations aimed at encouraging travel by sustainable modes of transport. These measures should be supplemented by the provision of a car club scheme and sustainable transport vouchers via S106 contributions.

KCC Highways therefore do not raise an objection to this planning application, subject to conditions being imposed that prevent occupation of the development until the following offsite highway improvements have been implemented:

- Off road shared foot/cycleway between Tonbridge train station and Brook Street as shown on drawing number: 10246-SK-05 titled '*Waterloo Road Cycle Route, Option 1*'

A section 278 agreement is required for the above referenced highway improvement works on Waterloo Road, as well as those on Upper Haysden Lane to achieve access to the development.

The recommendation of no objection is also subject to the applicant being required to enter into a Section 106 Agreement to secure financial contributions towards:

- A car club. The level of contribution should be sufficient to provide free membership for all residents for a minimum of 1 year, as well as covering any costs involved in setting up the car club. Responsibility for arranging the car club, providing the required space (s) and membership for residents should be the applicants and secured via obligation within the S106.
- A sustainable travel voucher for every household.
- The upgrading of the existing bus stop outside Hayesbrook School. The level of contribution should be sufficient to allow the provision of sheltered waiting facilities.
- £948 towards the highway authority's cost in monitoring the applicant's framework travel plan and ongoing liaison with the applicant's appointed travel plan coordinator.

Finally, the following should be secured via planning condition:

-The development/new school shall not be brought into use until a Travel Plan, to reduce dependency on the private car, has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall include objectives and modal-split targets, a programme of implementation and provision for monitoring, review and improvement. Thereafter, the Travel Plan shall be put into action and adhered to throughout the life of the development, or that of the Travel Plan itself, whichever is the shorter.

-Submission of a Construction Management Plan before the commencement of any development on site to include the following:

- (a) Routing of construction and delivery vehicles to / from site

- (b) Parking and turning areas for construction and delivery vehicles and site personnel
- (c) Timing of deliveries
- (d) Provision of wheel washing facilities
- (e) Temporary traffic management / signage

-Provision of construction vehicle loading/unloading and turning facilities prior to commencement of work on site and for the duration of construction.

-Provision of parking facilities for site personnel and visitors prior to commencement of work on site and for the duration of construction.

-Provision of measures to prevent the discharge of surface water onto the highway.

-Provision of wheel washing facilities prior to commencement of work on site and for the duration of construction.

-All Electric Vehicle chargers provided for homeowners in residential developments must be provided to Mode 3 standard (providing up to 7kw) and SMART (enabling Wifi connection). Approved models are shown on the Office for Low Emission Vehicles Homecharge Scheme approved chargepoint model list: <https://www.gov.uk/government/publications/electric-vehicle-homecharge-scheme-approved-chargepoint-model-list>

-Use of a bound surface for the first 5 metres of the access from the edge of the highway.

-Provision and permanent retention of secure, covered cycle parking facilities prior to the use of the site commencing in accordance with details to be submitted to and approved by the Local Planning Authority.

-Completion and maintenance of the access shown on the submitted plans (**drawing number: 10246-HL-01 Rev K titled 'Proposed access arrangements' and drawing number: 10246-SK-02 Rev A titled 'Proposed footpath link' prior to the use of the site commencing.**)

-The proposed roads, footways, footpaths, verges, junctions, street lighting, sewers, drains, retaining walls, service routes, surface water outfall, vehicle overhang margins, embankments, visibility splays, accesses, carriageway gradients, driveway gradients, car parking and street furniture to be laid out and constructed in accordance with details to be submitted to and approved by the Local Planning Authority.

-Completion of the following works between a dwelling and the adopted highway prior to first occupation of the dwelling:

- (a) Footways and/or footpaths, with the exception of the wearing course;
- (b) Carriageways, with the exception of the wearing course but including a turning facility, highway drainage, visibility splays, street lighting, street nameplates and highway structures (if any).

-Provision and maintenance of the visibility splays shown on the submitted plans (**drawing number: 10246-HL-01 Rev K titled 'Proposed access arrangements'**) with no obstructions over 0.6 metres above carriageway level within the splays, prior to the use of the site commencing.

INFORMATIVE: Should the development be approved by the Planning Authority, it is the responsibility of the applicant to ensure, before the 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 faithfully

Tom Harris
Development Planner