



## Tonbridge & Malling Borough Council

### Highways and Transportation

Ashford Highway Depot  
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Ashford  
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**Tel:** 03000 418181

**Date:** 10 August 2020

**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 18<sup>th</sup> February 2020 and 1<sup>st</sup> April 2020. I note that in response to this authority's most recent consultation response, dated 1<sup>st</sup> April 2020, the applicant has submitted a further revision of the Transport Assessment (*Revision 5*) and Transport Technical Note (*Technical Note 12*).

### Site Access

#### **Vehicular Access**

The applicant has revised the proposed site access arrangements (drawing numbers: 10246-HL-01 Rev K and 10246-SK-02 titled '*Proposed Access Arrangements*' and '*Proposed Footpath Link*') and it is now proposed to retain the no entry/exit only of the junction with access restricted for buses and access only. These arrangements ensure that turning provision for coaches that are dropping off students undertaking activities on the Judd School's nearby off-site sports facilities is maintained. This satisfactory addresses Kent County Council (KCC) Highways previous concerns about the potential for vehicles to undertake hazardous manoeuvres within the highway.

Should the proposals be granted consent then a Traffic Regulation Order (*TRO*) will be required, which should be obtained via this authority's third-party TRO process. This should be a requirement of any consent.

It is also acknowledged that a new Independent Stage 1 Road Safety Audit (RSA) has been submitted in support of the amended site access arrangements (*Safety Engineering Services Ltd document reference: SESL2006*). The audit has raised one minor problem relating to the tactile paving at pedestrian crossing points being too shallow for visually impaired highway users. KCC Highways agree that this is a detailed design issues, which would be addressed at any future S278/detailed design stage.

KCC Highways previously highlighted the fact that the visibility splays from some of the pedestrian crossing points shown on the key of the previous access drawing did not correspond to the drawing's measured value. Whilst the applicant has now revised the visibility splays and the measured values on the drawing correspond with the stated values, the sight lines proposed are less than required for the roads design speed (*43 meters required for a design speed of 30mph*). No rationale for providing visibility sight line less than the relevant technical guidance has been provided by the applicant.

In accordance with the Kent Design Guide (KDG) the applicant has also now proposed an emergency access on Lower Haysden Lane. This access will be 3 meters wide and double as a sustainable connection point with the adjacent land parcel, which is also allocated for residential development within Tonbridge and Malling Borough Council's (TMBC's) emerging Local Plan. The removal of obstructive vegetation at this location will be required to achieve the visibility sight lines from the proposed crossing points. Confirmation that the proposed access arrangements are adequate for the requirements of Kent Fire and Rescue (KFRS) has also now been provided by the applicant.

### **Pedestrian Access**

Confirmation that the existing footpath which provides access to the Judd school's offsite playing fields will be retained has now been provided by the applicant. This amended footpath will be 3 meters wide and provide a link up to the existing playing fields; however, the section of footway located on the west side of the main spine road is still shown as 2 meters wide. As per KCC Highways previous comments this should be widened to 3 meters in order to enable the provision of a shared foot/cycleway.

### **Sustainable Travel**

Further to this authority's previous comments in relation to providing a link between the development site and Haysden Country Park, the applicant has again stated that should a new footpath be delivered as part of planning permission 15/03918, then a new link will be provided between the site and country park. KCC Highways would again highlight the fact that this permission does not require the applicant for that consent to provide any such link via Grampian condition, S278 works or S106 contribution.

As 3<sup>rd</sup> party land would be required to provide a link between the site and the country park the applicant has suggested that it may be more feasible to provide the requisite link via Public Right of Way (PROW) MU50. This could be provided via the newly proposed pedestrian crossing point on Lower Haysden Lane and new connections to PROW MU50 within the adjacent land parcels allocated for housing within the emerging local plan. The crossing point should be secured as part of any S278 agreement to ensure a future connection with the country park.

## **Travel Plans**

A School Travel Plan Statement (*STPS*) has now been provided by the applicant. Suggested measures to encourage trips by sustainable modes contained within the STPS include: the implementation of an active travel awareness strategy, sustainable travel events, cycle proficiency training, creation of a walking bus and provision of secure and covered cycle/scooter parking. These measures are considered reasonable and appropriate.

Prior to commencement of development the applicant shall submit for written approval of the Local Planning Authority a Travel Plan and register the plan with KCC Jambusters website ([www.jambusterstpms.co.uk](http://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.

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 £2,370 is required (£1,422 for the school and £948 for the residential element), 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.

## **Public Transport**

KCC Public Transport colleagues have confirmed that a contribution of £1,100 per dwelling towards bus improvements, with no predetermined bus service identified upon receipt of funds is sought. This would enable the county council's public transport team to spend the money on enhancing existing services operating close to the site or encourage local operators to invest in the area via the provision of suitable roadside infrastructure.

## **Growth Rates**

The applicant has responded to this authority's previous comments by stating that these have been addressed in paragraph 8.9 of the revised TA. KCC Highways disagree with the applicant's conclusion as review of the network diagrams in the revised TA confirms that the same Temprow growth rate applied in the previous iteration of the TA, have again been applied in this new revision of the TA. A single growth rate has also been applied, regardless of the classification or characteristics of the road.

KCC Highways would also again highlight the fact that adjustments (*alternative assumptions*) to the Temprow growth rate that account for the whole site allocation are only applicable when considering the 'cumulative' impact of the wider site allocation. Consequently, KCC Highways previous comments in respect of this matter again remain unaddressed.

## **Trip Distribution**

### **School/educational trips**

The applicant's TTN (*TTN 12*) states that the distribution of the educational trips has been revised to only include destinations within the Tonbridge area. Review of the network diagrams and capacity assessment outputs in the revised TA confirms that the distribution of the educational trips remains unchanged from the previous iteration of the TA; therefore, contradicting the TTN. Consequently, KCC Highways previous comments in respect of this matter remain unaddressed.

## **Traffic Impact**

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

As highlighted in paragraph 9.16 of the revised TA KCC Highways provided the applicant with a draft cycle improvement scheme, which included amendments to the Brook Street roundabout. These proposals were in outline form only and have not yet progressed to the detailed design stage or been subject to an independent stage 1 RSA. Neither a stage 1 RSA or a drawing illustrating how the revised layout complies with the relevant technical standards has been provided within the revised TA.

Revised baseline (2019) and future year (2031) assessments for this junction have been provided by the applicant, with the outputs from these assessments contained in Appendix I of the revised TA. Whilst the geometrical parameters and traffic flows used in the revised assessments are consistent with the previous iteration of the TA different slope/intercept/capacity values have now been used. For example, the capacity assessments in revision 4 of the TA use an intercept value of 987 PCU's an hour for the A26 south arm of the roundabout; however, this has been increased to 1017 PCU's an hour in the revised TA. Consequently, the results of the junction capacity assessments in the revision 5 of the TA are much more favourable than those in revision 4 of the TA. No rationale for amending the intercept values has been provided by the applicant

KCC Highways also note that the observed maximum queue lengths within the baseline assessments have been lowered. For example, in revision 4 of the TA a RFC of 1.02 and observed queue length of 43 vehicles is given for the A26 south arm of the junction in the AM peak; whereas this has now been revised down to an RFC of 0.95 with an observed queue of 35 vehicles in the latest iteration of the TA. No new queue length surveys have been provided by the applicant to substantiate the revised observed maximum queue lengths.

Due to the lack of stage 1 RSA, drawing demonstrating how the proposed junction improvements comply with relevant technical standards and anomalies identified within the applicant's revised junction capacity assessments; KCC Highways remain of the view that the applicant has not demonstrated with sufficient confidence that mitigation of impact has been achieved at this junction.

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

Revised junction capacity assessments have also been provided for this junction by the applicant. However, like the revised Brook Street assessments whilst the geometrical parameters and traffic flows used in the revised modelling are consistent with the previous iteration of the TA, revised slope/intercept/capacity values have now been used. For example, the capacity assessments in the previous iteration of the TA used an intercept value of 1132 PCU's an hour for the Quarry Hill Rod south arm of the roundabout; however, this has been increased to 1157 PCU's an hour in the revised TA. Again, no rationale for amending the intercept values has been provided by the applicant. In addition, KCC Highways would also highlight the fact that the flare length in the baseline and future assessments on the A26 arm of the junction has increased to 12 meters, which is in excess of that used in the previous iteration of the TA and not in accordance with the geometrical parameter drawing previously provided (*drawing number: 10246-JG-03*).

KCC Highways also note that the observed maximum queue lengths have been lowered within the baseline assessments at this junction also. For example, in the previous iteration of the TA a RFC of 0.99 and observed queue length of 35 vehicles is given for Quarry Hill Road South

arm of the junction in the AM peak; whereas this has now been revised down to an RFC of 0.97 and an observed queue of 26 vehicles in the latest iteration of the TA. No new queue length surveys have been provided by the applicant to substantiate the revised observed maximum queue lengths.

No independent stage 1 RSA or corresponding designer's response has been provided in support of the proposed junction improvements. Given that the proposals involve amendments to the public highway an RSA and supporting designer's response is required.

The applicant has concluded that mitigation of impact has been achieved, this is on the basis that on 2 of the 3 arms of the junction the anticipated queuing and delays would be no worse than in 2031 without the development traffic following the junction amendments. In respect of the B2260 arm of the junction the applicant's capacity assessment confirms that mitigation of impact has not been achieved, as even with the proposed junction amendments queuing and delays will exceed 2031 forecast conditions. Considering this the applicant has stated that this cannot be considered as 'severe' because the additional traffic generated by the development will be within daily variations; this is unsubstantiated.

Due to aforementioned reasons, KCC Highways remain of the view that the applicant has not demonstrated with sufficient confidence that mitigation of impact has been achieved at this junction.

### **Waterloo Road junction with B2260 (signalised junction)**

A baseline assessment (2019) has now been undertaken for this junction. This assessment is supported by observed queue length surveys undertaken on Wednesday 16<sup>th</sup> October 2019, which suggest that all arms of the junction operate with minimal queuing. However, the capacity assessment indicate that much more significant queuing currently occurs at the junction; this is consistent with KCC Highways own observations from previous site visits. Clarification on why the modelled and observed queues differ so significantly is required.

KCC Highways traffic signals team have reviewed the applicant's revised baseline Linsig model and confirm that there are still several technical errors within the junction capacity assessment. Firstly, the incorrect inter green times have been used; the maximum extendable intergreen time of 15 seconds should be used within each pedestrian phase. In addition, the all red pedestrian stage needs to be modelled in every cycle with the maximum extendable intergreen times owing to significant pedestrian demands generated at the junction. Due to the aforementioned reasons, KCC Highways remain of the view that the applicant has not demonstrated with sufficient confidence that mitigation of impact has been achieved at this junction.

Finally, the TA makes no comment in respect of the exit blocking at the roundabouts north and south of the junction which is known to occur because of the signalised configuration of this junction and its close proximity to two other junctions.

### **B2260 junction Barden Road and Vale Road (Roundabout junction)**

Baseline assessments (2019) have now been provided for this junction also. The results of these assessments confirm that the junction is currently operating over practical capacity, with queuing and delays on most arms of the junction in the AM and PM peak period. Comparison of the results of the queue length surveys previously undertaken by the applicant confirm that the capacity assessment significantly underestimates the extent of queuing currently occurring at the junction. For example, in the AM peak period a maximum queue length of 38 vehicles is recorded between 08:40 and 08:45 in the queue length surveys; yet the applicant's baseline line

assessment indicates a maximum observed queue of 10 vehicles and modelled queue of 6 vehicles on the B2260, High Street arm of the junction. The reason for this is unclear and requires explanation as the modelled queues do not represent observed conditions. Consequently, KCC are of the view that it is not possible to draw firm conclusions on the impact at this junction.

The applicant has concluded that the impact of the development cannot be considered 'severe' because the development proposals will generate a maximum of 74 two-way vehicle trips and is therefore likely to be within daily variations. Again, this is unsubstantiated. In addition, the applicant's approach also ignores how due to the presence of existing severe congestion even relatively small increases in traffic can have a disproportionality high impact on queueing and delays.

Finally, comparison of the junction capacity outputs with the tables (*Table 9n and 9o*) in the revised TA confirms several anomalies. Firstly, the results of the capacity assessments (*degrees of saturation and mean max queues*) in the outputs and tables differ with the reason for this being unclear and requiring explanation. In addition, the AM peak hour assessments uses the observed traffic flows from the October 2019 surveys for between 09:00 and 10:00 on the Barden Road arm of the junction. The reason for using the 09:00-10:00 flows is unclear because review of the traffic survey data confirms that peak hour flows between 08:00 and 09:00 were higher on this arm. The higher, more robust traffic flows should be used in any future assessment of this junction.

### **Personal Injury Collision Record (PIC)**

Up to date PIC has now been provided by the applicant. This data covers the latest 5-year period currently available, up to 31/12/2019. No additional crash cluster site or patterns can be identified from the previous period of analysis (*5-year period up to September 2018*) and it is therefore accepted that the proposals will not exacerbate any existing highway safety concerns.

### **Summary and Recommendation**

The applicant has been unable to conclusively demonstrated that suitable mitigation of impact can be achieved on the A26/B2260 corridor (*Tonbridge High Street to Brook Street*). KCC Highways are therefore remain of the view that the residual traffic impact on the local highway network would be 'severe,' and an objection is raised on this basis.

In the event that the Borough Council is minded to grant planning approval against the advice of the Highway Authority, KCC Highways would seek agreement with the Borough Council on the use of financial contributions towards road capacity improvements on the A26/B2260 corridor.

A Section 278 Agreement is also required to secure any proposed Highways on the Upper Haysden/Lowe Haysden Lane corridor, including any works to facilitate access to the site. Any works to be completed under a S278 agreement shall subject to agreement with KCC Highways.

The following should be secured via a Section 106 Agreement and planning conditions as appropriate:

-An appropriate sum per housing unit as a contribution towards highway capacity improvements along the A26/B2260 corridor. All details to be agreed with KCC Highways;

-Provision of works to upgrade the existing bus stop facilities outside '*The Hayesbrook School*,'

-An appropriate sum per housing unit as a contribution towards improved bus service provision through the enhancement of the existing service or the establishment of a new service. All details to be agreed with KCC Highways;

-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;

-Provision of a Travel Plan monitoring fee;

-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

-Before and after construction of the development, highway condition surveys for highway access routes should be undertaken and a commitment provided to fund the repair of any damage caused by vehicles related to the development;

-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 wheel washing facilities 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;

-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>

-Completion and maintenance of the access shown on the submitted plans 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 with no obstructions over 0.6 metres above carriageway level within the splays, prior to the use of the site commencing;

-Provision and maintenance of 2 metres by 2 metres pedestrian visibility splays behind the footway on both sides of the access with no obstructions over 0.6m above footway level, prior to the use of the site commencing.

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