



**Tonbridge & Malling Borough Council**

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**Highways and Transportation**

Ashford Highway Depot  
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**Tel:** 03000 418181

**Date:** 27 January 2022

**Our Ref:**

**Application - TM/21/02866/FL**

**Location - Land East Of Little Preston Yard And North Of M20 Coldharbour Lane  
Aylesford Kent**

**Proposal - Construction of five buildings to provide six units for industrial processes (Use Class E(g)(iii)); industrial (Use Class B2); and/or storage and distribution (Use Class B8)) purposes, with ancillary offices and associated landscaping, car parking, servicing and access arrangements**

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**

The proposals seek permission for the construction of five buildings to provide six units for industrial processes (*Use Class E(g)(iii)*); industrial (*Use Class B2*); and/or storage and distribution (*Use Class B8*) purposes, with ancillary offices and associated landscaping, car parking, servicing and access arrangement.

Kent County Council (*KCC*) Highways note that a Transport Assessment (*TA*), which was produced by the consultants Icen and is dated December 2021, has been submitted in support of the proposals. It is further acknowledged that a Transport Technical Note (*TTN*) has also been provided by the applicant, which *KCC* Highways have received via email.

**Access**

**Vehicular**

To access the development the applicant is proposing the realignment of Coldharbour Lane, as well as a change in priorities to give priority to the development. A typical carriageway width of 6 meters, with localised widening and hatching at bends is proposed to accommodate the two-way flow of heavy goods vehicles (*HGV's*).

The *TA* contends that this is acceptable on the basis that the existing properties currently served from Coldharbour Lane generate a limited amount of traffic and a change of priority would reflect the future balance of traffic flows. *KCC* Highways raise no objection in principle to the proposed change of priorities, given how Coldharbour Lane is a no through road and serves a small number of dwellings that only produce a limited number of traffic movements.

Although swept path analysis has been provided to demonstrate the suitability of the proposed carriageway alignment for the two-way flow of HGV's, this confirms that HGV's will be required to undertake significant overrunning of the hatched areas of carriageway.

In accordance with this authority's formal pre-application advice the applicant has commissioned an independent stage 1 Road Safety Audit (*RSA*). The *RSA* and supporting designer's response is appended to TTN. The *RSA* raises fundamental concerns about the proposed sight access strategy.

The audit raises numerous issues relating to the suitability of the carriageway for development traffic (*problems 2.1.1 and 2.1.2 in the audit*). In response the applicant contends that the existing proposals are acceptable due to their being a low probability of two HGV's passing one another at the same time. This does not address the problem raised by the auditor and ignores how the risk of conflict will increase because of increased traffic flows from the development.

In addition to concerns about the available carriageway width, the *RSA* also raises concern about visibility and swept paths from the existing National Highways Depot or Coldharbour Lane junction (*problems 2.1.3, 2.2.1, 2.2.2 and 2.2.3*). The applicant contends that the information already submitted is sufficient, with the proposals offering a slight betterment on the existing situation. Again, this fails to adequately address the auditor's concerns.

Two remaining problems are raised by the auditor (*problem 2.2.4 and 2.3.1*); however, the designer's response places an over reliance on resolving these issues at the detailed design stage. These problems require addressing now, particularly considering the fact that outline permission with access is being sought at this stage.

Finally, the TTN also concludes that the access arrangements as proposed are acceptable because at the time of the audit the National Highways depot access in question did not appear to be in use. This conclusion is not supported by any evidence or endorsed by National Highways. Consequently, KCC Highways consider that observations from an audit only provide a snapshot.

## **Pedestrian**

To ensure connectivity with the existing pedestrian infrastructure the applicant has proposed a new section of 1.5-meter-wide footway on the southern side of Coldharbour Lane. The applicant's TA explains that it is not possible to achieve a wider footway owing to a corridor of only 8 meters being available, because of existing ancient woodland that lies within the site boundaries.

In this instance, KCC Highways consider a 1.5-meter-wide footway to be acceptable given the sites location and nature of the uses that permission is sought for. Given the sites remote location on the outer extents of the existing built-up area and proximity to the strategic road network (*SRN*), it is considered that pedestrian trips to and from the site will be limited.

## **Sustainable Transport**

### **Public Transport**

An assessment of the site's sustainable transport credentials, including opportunities for travel by public transport, has been undertaken by the applicant. This assessment concludes that there are good opportunities for travel by public transport given the sites proximity to the bus stop on Aylesford High Street and Aylesford train station.

The most direct route to the infrastructure in question is via the existing Public Right of Way (PROW) MR479A that runs north of the Medway Valley railway line. The unlit and unmade nature of the route will to some extent discourage trips via this route and trips by public transport. To mitigate this fact and encourage trips by more sustainable modes the applicant should be required to provide a S106 contribution towards the upgrading of MR479A

### **Walking and Cycling**

The existing pedestrian infrastructure terminates at the National Highways Coldharbour depot. To improve route connectivity the applicant is proposing an additional section of footway on the southern side of Coldharbour Lane, thus allowing onward connections to south Aylesford and Maidstone via Coldharbour Lane and the A20, London Road.

As identified within the applicant's TA there are few suitable cycling routes within the proximity of the site, with anyone wishing to cycle to the development having to utilise on carriageway provision. KCC Highways consider that this will significantly discourage cycle trips, given the heavily trafficked and strategic nature of Coldharbour Lane and the A20, London Road. KCC Highways consider that due to the developments isolated location sustainable modes of transport will have a limited role in meeting the development's operational demands.

### **Trip Generation**

The applicant's TA indicates that the trip rates used in support of the recently consented Vantage Point site (TMBC reference: 19/00449/FL) have been used for assessment purposes. As set out in KCC Highways formal pre-application advice this approach is acceptable in principle given how both sites have similar locational characteristics on the edge up of the built-up area and near to the strategic road network (SRN).

Table 6.1 of the TA indicates that in the AM peak a two-way trip rate of 0.497 has been used, with a trip rate of 0.448 used in the PM peak period. It is unclear why these trip rates have been adopted as higher trip rates were used in support of the Vantage Point development. Revised capacity assessments are therefore required using the higher trip rates that were agreed as part of the Vantage Point development. For ease of reference the previously agreed trip rates have been reproduced below in Table 1

<b>Trip rate (per 100 sq/m)</b>			
	<b>Arrivals</b>	<b>Departures</b>	<b>Two-way</b>
<b>AM Peak</b>	0.483	0.226	0.709
<b>PM Peak</b>	0.170	0.446	0.616

**Table 1:** Vehicular trip rates approved by KCC Highways as part of the Vantage Point TA

### **Trip Distribution**

The TA indicates that the development trips have been distributed onto the highway network according to the methodology agreed with KCC Highways as part of pre-application discussions. This is only partially correct, in that the principle of using Census Travel to Work data was agreed; however detailed distribution assumptions were never provided.

KCC Highways note these have now been provided in the Appendix of the TA with overall distributions indicated on the network diagram titled '*total distribution.*' The applicant anticipates

that 54% of trips will route via the Strategic Road Network using the M20 motorway. All remaining trips are anticipated to route via the local highway network using the A20, London Road or Hermitage Lane.

Having reviewed the detailed distribution breakdowns provided KCC Highways disagree with several assumptions within them. For example, a significant proportion of trips with a start/end destination in Medway have been split via the M20 east (*route 1*) and the A20 west (*route 6*), despite the fact that google real time journey planner confirms the fastest route to these destinations is via the A229, Bluebell Hill, which would involve travelling via the M20 (*east*). This is also true of several destinations that have an end destination in Maidstone. The distribution assumptions should therefore be revised to account for this fact. A detailed breakdown of where KCC Highways disagree with the distribution assumptions presented within the TA is available upon request.

In addition, there are numerous examples in route distribution table where the split across the identified routes does not correspond to the overall split for that destination. For example, MOSA EO2005127: Swale 013 indicates that this MSOA accounts for 1% of the overall split, with the trips being split across route 1 and route 6. The table indicates that 0% of trips have been evenly split across both these routes; however, 0% of trips across both these routes would not total 1%. This requires clarification

### **Traffic Surveys**

The applicant has undertaken an extensive set of manual classified counts on 6<sup>th</sup> October 2021. These traffic surveys have then been used as the basis for the junction capacity assessments presented within the applicant's TA. KCC Highways consider the use of the October 2021 counts to be a suitable basis for assessment, given that they were undertaken in a traffic neutral period outside of any Covid 19 restrictions.

### **Baseline Assessments, Horizon Year and Tempo Rates**

To factor up the baseline assessments to the assessed future year (*2026*) the applicant has used Tempo growth factors. Whilst this is acceptable in principle to KCC Highways the TA does not confirm what census Middle Super Output Area (*MSOA*) the growth rates in Table 6.6 relate to. Ordinarily, they would be related to the Census MSOA that the development is located in. Confirmation is required.

To validate the baseline assessments the applicant has used queue length data, which was obtained at the time of the October traffic surveys. This is considered to be a robustly robust method for validation. A future year of 2026 has been utilised by the applicant, KCC Highways consider this to be a suitable year for assessment purposes

### **Committed Development**

The following committed developments have been accounted for within the applicant's junction capacity assessments:

- Land south of London Road, 250 dwellings (*Waites site TMBC reference: 19/01814/OA*)
- Land east of Claire Park, 110 dwellings (*East Malling Research Station site, TMBC reference: 18/03008/FL*)
- Land at Kiln Barn Road, 300 dwellings (*East Malling Research Station site, TMBC reference 18/02966/OA*)

- Land south of London Road, 840 dwellings (*Whitepost Field site, TMBC reference 17/01595/OEA*)
- Land off Oakapple Lane, 118 dwellings (*TMBC reference: 20/01218/OA*)
- Land off Oakapple Lane, 187 dwellings (*MBC reference: 20/501773/FULL*)
- Aylesford Newsprint, employment site (*TMBC reference: 20/01820/OEA*)

Unfortunately, despite the fact that proposals for the expansion of the Quarry Wood retail park (*TMBC reference: 19/00979/FL*) and a new household waste recycling centre (*KCC reference: TM/0284/2019*) also benefit from planning permission, they have not been included within the applicant's assessment. Revised capacity assessments that include all committed development are therefore required.

### **Traffic Impact**

Whilst KCC Highways are unable to form a view on the suitability of the conclusions drawn within the TA until such time as the previous comments in this consultation response are addressed, KCC Highways have the following supplementary comments in relation to traffic impact.

#### **Coldharbour Lane junction with A20**

Paragraph 7.22 of the TA indicates that the future year assessment for this junction has been based upon the mitigations required as part of the consented Whitepost Field development. Whilst this development will provide improvements to the Poppyfields roundabout and a new link road between the A20 and Hermitage Lane, which will include a new roundabout access onto Hermitage Lane, it is only required to provide a financial contribution towards the Coldharbour Lane roundabout scheme that KCC Highways are seeking to bring forward.

The applicant should therefore clarify what junction configuration the future year assessment has been based upon. Table 7.5 would indicate that some form of signalised arrangement has been modelled as the performance indicators are given in degree of saturation and not RFC's. Should this be the case then this would be concerning as KCC Highways are bringing forward an enlarged roundabout arrangement that does not include traffic signals.

In the event that a future year assessment has not been undertaken which includes the enlarged roundabout arrangement, a further assessment is required. Drawings of this arrangement that can be used for assessments purposes can be made available upon request

#### **A26, Tonbridge Road junction with Fountain Lane**

The TA does not quantify the amount of additional traffic that is anticipated to route through this junction. This junction is known to suffer from congestion at peak hours and KCC Highways are actively looking to progress an improvement scheme. Consequently, the amount of additional development traffic that is anticipated to route through this junction at peak hours should be quantified. Once this is quantified KCC Highways will form a view on if any further assessment is required.

### **Parking**

#### **Car Parking**

337 car parking spaces are proposed.

As explained within the applicant's TA the overall level of parking required will depend upon the eventual end user of the use, with E(g) (iii) use (formerly B1 light industrial use) having a more intensive parking demand, than B8 use (storage and distribution). Consequently, to strike a balance between having too little and too much parking, parking has been provided at an overall rate of space per 81 square meters across the site.

To demonstrate the suitability of the proposed provision the applicant has undertaken a parking accumulation exercise. In order to account for any 24/7 use it has been assumed that the car park would be 33% full overnight. KCC Highways consider this to be a reasonably robust assumption.

The results of this assessment are shown in Table 4.8 on page 24 of the applicant's TA. KCC Highways have sense checked this assessment and the calculations contained in the table do not correspond to the TRICS output in Appendix A8 of the TA. A revised assessment is therefore required. In addition, it is unclear how the applicant has derived the anticipated arrivals and departures between the hours of 19:00 and 07:00, as the TRICS data contained in the TA only covers the period between 07:00 and 19:00. This matter should be clarified.

Although the TA considers what level of lorry parking should be provided, dependent upon the end use and size of each unit, it does not confirm what level of lorry parking will be provided across the site. This should be clarified so KCC Highways can assess the level of provision proposed against adopted standards and likely operational demands.

### **Cycle Parking**

142 cycle parking spaces are proposed.

The level of provision accords with this authority's long stay cycle parking standards, as set out in Supplementary Planning Guidance Note 4 (SPG4), Kent Vehicle Parking Standards. Although the level of provision represents a shortfall when considered against the 'short stay' standard, KCC Highways consider that cycle trips to the development will be limited.

As highlighted within the applicant's TA there are no dedicated cycle routes within the proximity of the site, with the heavily trafficked and strategic nature of the roads leading to the development likely to discourage cycle trips. In summary, KCC Highways consider the proposed provision to be adequate for the development's likely operational demands.

### **Turning and Servicing**

To accommodate the turning requirements of HGV's the applicant has proposed yard areas adjacent to each of the individual units. Swept path analysis demonstrating the suitability of these areas for HGV's is contained in Appendix A7 of the applicant's TA. This analysis confirms that HGV's can enter the site, manoeuvre and then egress onto the public highway in a forward motion. Accordingly, the internal site layout is considered acceptable for the operational demands of the development.

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

The applicant's TTN contains PIC data for the 5-year period up to the 30<sup>th</sup> September 2021. Whilst the source of this data is acceptable to KCC Highways the assessment contained within the TTN focuses on the M20 J5 roundabout.

No analysis of the local highway network (LHN) has been undertaken, with Hermitage Lanes junction with the A20 also excluded from the assessment. The scope of the assessment should

be extended to include the junction in question, as well as the other junctions within the scope of the assessment that are located on the LHN.

### **Summary and recommendation**

KCC Highways wish to raise a **holding objection** on the basis that the applicant should provide the following information/clarifications:

- A revised site access strategy that addresses all the problems in the stage 1 RSA;
- Submission of revised PIC data and analysis that includes all junctions on the LHN within the scope of the assessment;
- Revised capacity assessments that include the following:
  1. The higher trip rates agreed as part of the Vantage Point development;
  2. Revised distribution assumptions that have been agreed with KCC Highways;
  3. All committed development, as identified in this consultation response;
- Confirmation of why the split of development trips for some MSOA's presented in the distribution table do not correlate with the overall split presented in the table;
- Confirmation of the census MSOA the Temprow growth rates in table 6.6 relate to;
- Confirmation of what junction arrangement has been used for the future year assessment at Coldharbour Lane junction with A20, London Road
- Quantification of the amount of development trips that are anticipated to route through the A26, Tonbridge Road junction with Fountain Lane
- Submission of a revised car parking accumulation exercise that accords with the TRICS data in Appendix A8 of the TA;
- Confirmation how the arrivals and departures for the period between 19:00 and 07:00 presented in Table 4.8 on page 24 of the TA have been derived;
- Confirmation of the amount of lorry parking that will be provided across the site;

**Informative: It is important to note that planning permission does not convey any approval to carry out works on or affecting the public highway.**

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be given because planning permission has been granted. For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

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 public highway. Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have highway rights over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process.

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 have been obtained and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority. The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant 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.

Guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181

Yours Faithfully

**Director of Highways & Transportation**

\*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.