



**Tonbridge & Malling Borough Council**

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**Highways and Transportation**

Ashford Highway Depot  
4 Javelin Way  
Ashford  
TN24 8AD

**Tel:** 03000 418181

**Date:** 10 May 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**

This response should be read in conjunction with this authority's previous consultation responses dated 27<sup>th</sup> January 2022 and 9<sup>th</sup> March 2022. In response to this authority's previous comments, it is noted that the applicant has submitted the following additional information:

- Transport Technical Note (*TTN*) dated 25<sup>th</sup> March 2022
- Transport Note (*TN*) dated 6<sup>th</sup> May 2022

**Access**

**Vehicular**

The applicant has proposed a revised site access strategy to address the concerns raised in the Road Safety Audit (*RSA*). Whilst some amendments have been made the previously proposed priority changes are retained. Kent County Council (*KCC*) Highways continue to consider this to be acceptable, given how the development will be the primary trip attractor on Coldharbour Lane

Amendments include the removal of the previously proposed footway, which has enabled a wider carriageway width to be provided. Problems 2.1.1, 2.1.2 and 2.1.3 of the *RSA* related to the narrow carriageway width and consequential potential for personal injury collisions (*PIC*) as a result. The auditor recommended that the carriageway be widened to reduce the potential for

conflict. These recommendations have now been accepted by the applicant and incorporated in the latest site access strategy proposals (*drawing number: 10 Rev A*).

Problems 2.2.2 and 2.2.3 of the RSA relate to the limited visibility through the bend and existing National Highways Depot/Shannon House access. The auditor recommended that vehicle speeds on Coldharbour Lane should be reduced via the implementation of appropriate signage and road markings. Again, the applicant has now accepted the recommendation. Subject to the incorporation of adequate road signage and markings on Coldharbour Lane at the detailed design/S278 stage, it is considered that these problems have now been satisfactorily addressed.

A drawing to demonstrate the available visibility from the National Highways/Shannon House access, as well as forward visibility through the bend has been provided by the applicant. Visibility sight lines commensurate with a driven speed of 17 and 10 miles per hour (*mph*) are proposed. KCC Highways consider these to be appropriate, given how vehicles travelling south on Coldharbour lane will have to navigate a near 90-degree bend on the approach to the access in question.

Problem 2.2.1 relates to the increased risk of conflict at the existing Coldharbour Lane, which will no longer have priority over the private service road. As highlighted by the auditor visibility from the access will be obscured as a consequence of vegetation and other boundary features that abut the neighbouring property. Visibility sight lines of 2.4 by 26 or 2.4 by 25 meters are proposed. This is commensurate for the design requirements of 20 mph. The applicant has confirmed that vegetation clearance will be undertaken to achieve the visibility sight lines proposed, thereby addressing the auditor's concern.

For the avoidance of doubt the applicant has incorporated the existing access for '*Holtwood Rangers*' (*problem 2.2.4 in the audit*) into the latest proposals. This provides the required confirmation that this access will be retained, thereby addressing the problem identified in the audit.

Finally, problem 2.3.1 of the audit relates to tactile crossing provision. As highlighted in the applicant's designer response the previously proposed footway provision has now been removed. Consequently, this problem is no longer relevant in the context of the latest site access strategy.

## **Pedestrian**

KCC Highways maintain the view that pedestrian trips, particularly those from the direction of the M20 J5 will be limited, owing to the intimidating nature of the route. The isolated nature of the site on the edge of the built-up area away from existing sustainable transport infrastructure further reduces the propensity for trips by sustainable modes.

As highlighted in the latest TTN an existing Public Right of Way (*PROW*) route, *PROW: MR479A/2* lies north of the site and allows direct connectivity with Aylesford village centre. In lieu of a direct pedestrian link on Coldharbour Lane a S106 contribution should be secured towards the upgrade of *PROW: MR479A/2*.

## **Trip Generation**

Revised trip generation forecasts have now been provided by the applicant. In accordance with this authority's previous comments the revised site selection parameters focus on sites in a

'edge of town' location. KCC Highways consider this to accurately reflect the locational characteristics of the development site.

Bespoke trip rates for Unit 2 have also now been provided. Given the limited sample available the trip rates presented for this unit are considered acceptable for forecasting purposes. The use of bespoke trip rates for Unit 2 adds robustness to the applicant's assessment, given how a parcel delivery/distribution use would generate more traffic than a traditional industrial unit.

### **Committed Development**

Both the previously omitted Aylesford Household Waste Recycling Centre (*HWRC*) and Aylesford Retail Park developments have now been included in the revised assessment. This satisfactorily addresses KCC Highways previous comments, whilst also ensuring a 'cumulative' assessment of the development's impact.

### **Traffic Impact**

#### **Coldharbour Lane junction with M20 J5 (*Roundabout Junction*)**

Revised capacity assessments using the trip rates now agreed with KCC Highways and all relevant committed development have been provided. These assessments confirm that the junction will operate without any unacceptable levels of queuing or delay, even with the additional development traffic.

#### **Coldharbour Lane junction with A20, London Road (*Signalised/Roundabout Junction*)**

Revised capacity assessments have now been provided using the correct geometrical parameters. Importantly, the results of the applicant's revised assessment confirm that the additional development traffic can be accommodated, without prejudice to improvement scheme that KCC Highways are seeking to bring forward at this junction in the near future.

In the interest of robustness, the applicant has also provided a further assessment for this junction, which assumes that the link road required as part of the White Post Field development is not operational. As the signed S106 agreement for this site only allows for 175 dwellings to be occupied in advance of the link road being operational, in this scenario the applicant has only accounted for the traffic for 175 units. This is reasonable given the sealed status of the S106 agreement. The results of this assessment also confirm that following the upgrading of the junction, even without the link road, the junction would continue to operate satisfactorily.

#### **Coldharbour Lane junction with A20, London and St Lawrence Avenue (*Roundabout Junction*)**

Revised capacity assessments for a scenario with and without the link road have been provided for this junction also. In the future year assessed the junction is expected to operate satisfactorily, except for the St Lawrence and Kent Police arms of the junction where significant increases in queuing are expected to occur.

The applicant's assessment is based upon the existing highway layout and not the enlarged roundabout arrangement that the White Post Field site is required to bring forward in accordance with the extant consent. Consequently, the applicant's assessment can be considered a 'worst-case' assessment that would be unlikely to occur in practice.

Queues are anticipated to increase by a maximum of 2 vehicles in the PM peak on these arms because of the development traffic. KCC Highways do not consider that such minor increases in queuing could be reasonably considered as 'severe', particularly given how the other arms of

the junction, which cater for through traffic on a strategic route are anticipated to continue to operate without any significant levels of queuing or delay.

### **A20, London Road junction with B2246, Hermitage Lane (*Signalised Junction*)**

Finally, a revised capacity assessment using the trip rates and distributions agreed with KCC Highways has been provided for this junction. Again, a scenario with and without the White Post Field link road has been considered by the applicant.

In the future year scenario without the White Post Field link road following the addition of committed development the junction is anticipated to operate with a degree of saturation in excess of 100% and significant delays in both peak hour periods. The development traffic is anticipated to increase these delays by a maximum of 7 seconds across the junction in the AM peak hour.

The applicant's future year assessment with the link road open confirms that conditions at the junction will significantly improve, with all arms expected to operate at acceptable levels other than the A20, westbound and internal eastbound stop line, which will operate with a degree of saturation (*DOS*) greater than 100%. The development traffic is anticipated to worsen the *DOS* by 0.8 on the westbound arm of the A20 in the PM peak hour. KCC Highways do not consider that an objection based on such a minor worsening of conditions could be sustained.

### **A26, Tonbridge Road junction with Fountain Lane (*Signalised Junction*)**

Based upon the agreed trip rates the applicant anticipates that the development will generate 10 two-way movements in the AM peak and 12 two-way movements in the PM peak at this junction. KCC Highways remain mindful of the existing congestion experienced at this junction and where reasonable will look to new developments to make contributions towards planned improvements. However, in this instance it is not considered that a financial contribution could be sought, given the modest amount of additional traffic that is anticipated to route through the junction because of the development.

## **Parking**

### **Car Parking**

A revised accumulation exercise has been undertaken by the applicant using the now agreed trip generation forecasts. To account for any 24/7 a high level of overnight parking (*53% of the total provision*) has been assumed. This is considered a highly robust assumption.

Whilst the revised accumulation exercise does confirm that for a short period of the day (*between 11:00 and 12:00*) the overall parking provision would reach capacity, the isolated nature of the site away from the public highway is recognised. In the event of any parking being displaced it is therefore likely that it will be displaced onto the site's internal access road themselves, rather than the public highway. Consequently, the likelihood of any unacceptable impacts on the public highway because of insufficient parking provision is limited. On this basis an objection on parking grounds is not considered to be sustainable.

### **Lorry Parking**

The applicant has confirmed that across the site there is capacity for 108 lorry parking spaces, inclusive of each unit's yard areas. An overall provision of 108 spaces represents 17 more spaces than required under KCC Highways adopted standards, Supplementary Planning

Guidance Note (SPG4), Kent Vehicle Parking Standards. This authority's previous comments in respect of this matter have now been satisfactorily addressed.

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

Additional PIC analysis to include all the junctions within the agreed scope of assessment has now been provided. This analysis confirms that during the period assessed 5 collisions were recorded at the B2246, Hermitage Lane junction with the A20. All these collisions were 'slight' in severity. Neither the highway layout nor any defects within it are listed as a contributory factor in any of the recorded collisions.

### **Summary and Recommendation**

I refer to the above planning application and having considered the development proposals and the effect on the highway network, raise no objection on behalf of the local highway authority subject to the following conditions:

-A financial contribution towards the upgrading of PROW MR479A/2 to be secured via a S106 Agreement

-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.

-Provision and permanent retention of the vehicle parking spaces and/or garages shown on the submitted plans prior to the use of the site commencing.

-Provision and permanent retention of the vehicle loading/unloading and turning facilities shown on the submitted plans prior to the use of the site commencing.

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

-Provision and permanent retention of the cycle parking facilities shown on the submitted plans prior to the use of the site commencing.

-Completion and maintenance of the access shown on the submitted plans (*drawing number 08 Rev A titled 'Proposed Site Access Arrangement'*) prior to the use of the site commencing.

-Provision and maintenance of the visibility splays shown on the submitted plans (*drawing number 10 Rev A titled 'Proposed Site Access Arrangement-Visibility Assessment'*) with no obstructions over 0.6 metres above carriageway level within the splays, prior to the use of the site commencing.

**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.