

Objection to Proposed Parking Restrictions along Regent Way and Pearl Way, Kings Hill

1. Reason for Objection

- 1.1. I object to the proposed parking restrictions, they are unjustified, excessive, unnecessary and will lead to a highway safety problem.
- 1.2. I also raise issue with the consultation details:
 - The Statement of Reasons and the notices displayed on lampposts do not include the full proposals for Regent Way
 - The details provided on the TMBC consultation webpage <https://www.tmbc.gov.uk/parking-transport/parking-review-kings-hill> are very confusing as the description doesn't mention parking restrictions, only the one-way traffic proposal for Fortune Way and Milton Lane.
 - There is a list of roads affected and residents are only able to support/object to the whole list and not object to some roads and support others. To be fair and reasonable support/objections should be gathered for each road separately.

2. Previous Objection

- 2.1. I wrote during the previous consultation in July 2021 and that letter was signed by other residents of Pearl Way who wanted to petition against the parking restrictions. This was hand delivered to TMBC and sent via email to parking.office@tmbc.gov.uk. The proposed parking restrictions have not been changed in the current consultation and so it seems that no consideration has been given to the petition and the views of the residents who will live with the consequences of the restrictions, if implemented. My understanding is that petitions relating to highway matters should be considered by JTB members, however no acknowledgement or response has been received to date.
- 2.2. The letter which was signed by the residents outlines the reasons for the objection to the parking restrictions and provides significant reasoning and evidence to show that the proposed parking restrictions are excessive, unjustified and unnecessary and will lead to speeding issues and safety problems where there currently are none.

3. Parking Restrictions additional comment regarding access and highway safety

- 3.1. Regent Way is approximately 7m in width, allowing ample space for even the largest vehicle to pass a parked car. Please see below an extract from the Department for Transport Manual for Streets which shows an HGV can pass a car on a 4.8m wide carriageway and 2 HGV's can pass safely on a 5.5m wide carriageway. Clearly with a 7m carriageway, such as Regent Way, there is no

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issue with access for through traffic caused by parking, however, residents and visitors to Pearl Way will be impacted by the parking restrictions along Regent Way as the speeds will increase along Regent Way presenting a highway safety issue for drivers and cyclists turning out of Pearl Way and for pedestrians wishing to cross Regent Way.

Extract from Manual for Streets – Street Dimensions

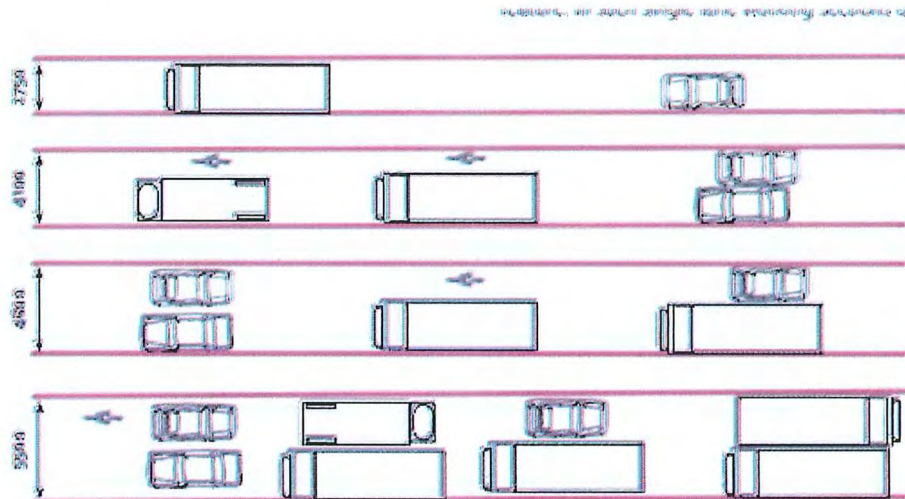
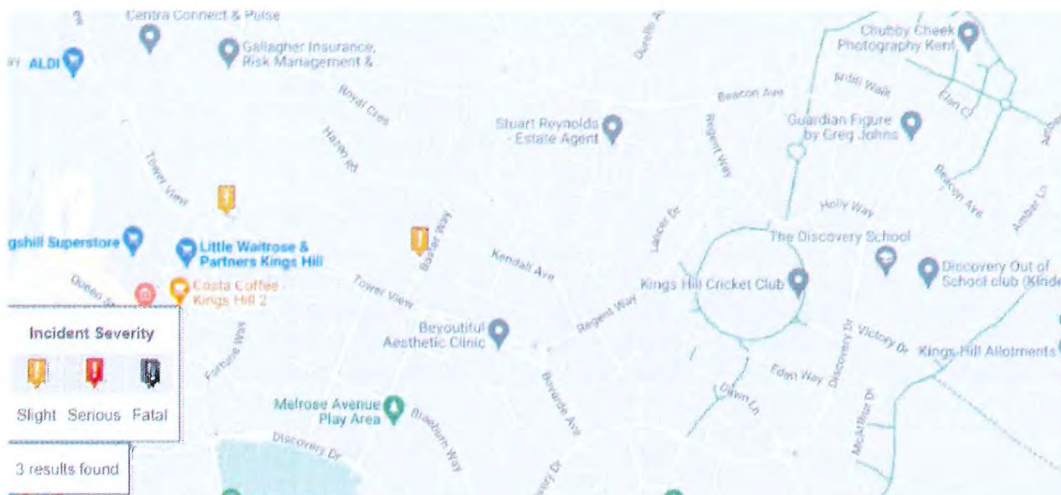


Figure 7.8 Illustrates what various carriageway widths can accommodate. They are not necessarily recommendations.

As some time has lapsed since my previous letter and petition were submitted, I have rechecked the crash record along Regent Way and Pearl Way and found that there have still been no recorded personal injury crashes within the latest 5 year period as can be seen from the extract from Crashmaps below:

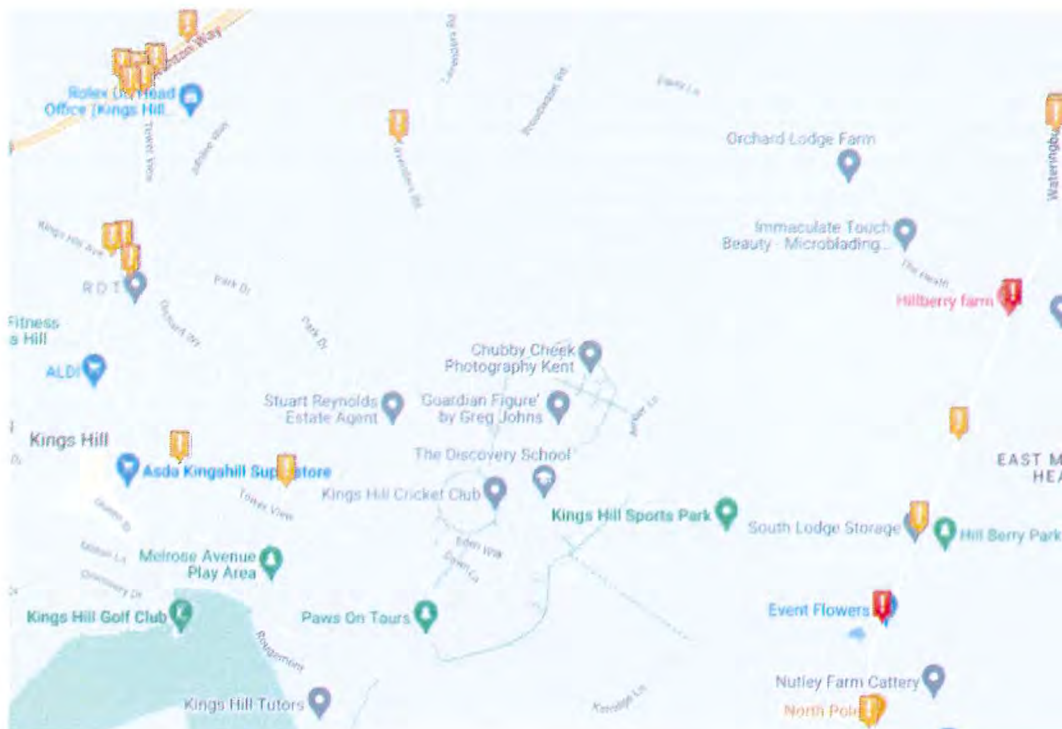
Extract from Crashmaps – Personal Injury Crashes latest 5 year period, Kings Hill



The fact that there are no recorded personal injury crashes along the whole length of Regent Way and Pearl Way indicates these roads are safe as they are, without the restrictions. The existing on-street parking along Regent Way slows traffic speeds and acts as traffic calming. There is no safety problem and no regular issues relating to access. With budget cutbacks, a cost of living crisis and everyone else making savings where they can, surely the limited resources we have available to us should be spent where they can achieve the most impact, so why not target this funding on areas where there is already a proven crash record and where that funding can make a positive impact to highway safety!?

I have provided another extract from Crashmaps below and zoomed out to show that there are areas in and around Kings Hill where sadly people have been injured in road accidents. There are clusters on the Tower View/Park Drive/Kings Hill Avenue roundabout, the A228/Tower View roundabout and along Waterringbury Road, East Malling. Why not use the funding allocated for parking restrictions on making safety improvements to some of these areas so that our roads are safer and less people are killed or injured? This would help to achieve the Vision Zero Road Safety Strategy for Kent as opposed to implementing measures which would lead to higher speeds to the detriment of highway safety. <https://www.kent.gov.uk/roads-and-travel/road-safety/road-casualty-reduction-strategy>

Extract from Crashmaps – Personal Injury Crashes latest 5 year period, Kings Hill



The Statement of Reasons for the proposed parking restrictions lists the reason as follows:

The aims of the restrictions are:

- to improve traffic movements,
- to maintain access to properties,
- to maintain public transport facilities
- to visibility at junctions
- to improve safety near schools

No evidence is provided of any of these issues. As I have stated in my previous letter of objection, I have been a resident for many years and I have never experienced or witnessed any issues relating to the above along Regent Way or at its junction with Pearl Way and this is backed up by the fact that there have been no personal injury crashes along Regent Way or indeed Pearl Way. The proposed restrictions on Regent Way are excessive and junction parking never occurs on Pearl Way so the proposed 15m parking restriction into the Pearl Way is completely excessive, unjustified and unnecessary.

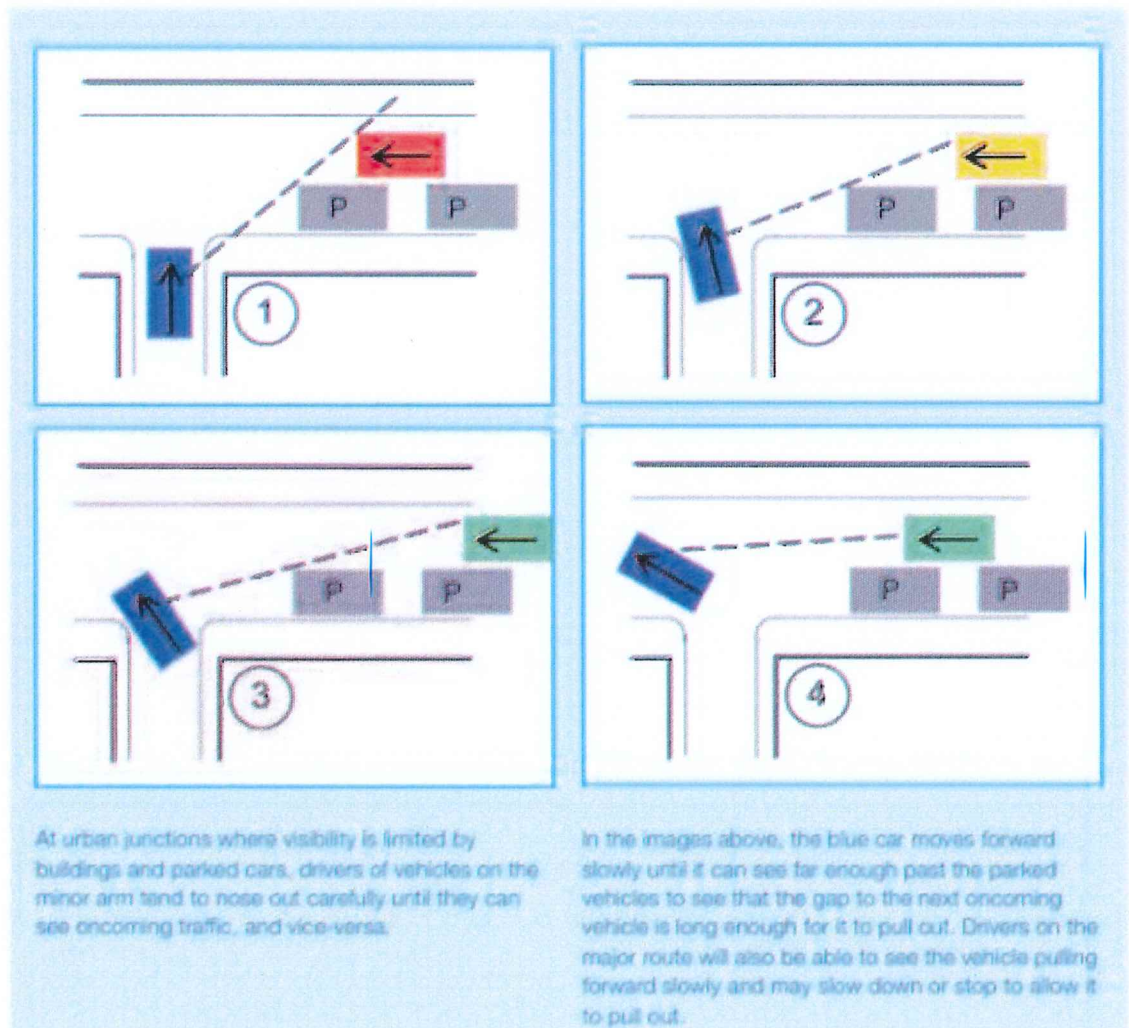
As I stated in my objection during the previous consultation in July 2021, I do not consider that there is a need for such extensive restrictions at the junctions and in particular at residential cul-de-sacs. In the case of the junction of Regent Way and Pearl Way, currently no parking takes place to restrict visibility. The only restriction to visibility is the landscaping at the junction which often becomes overgrown. I would like to point out that current guidance for visibility splays on residential streets is given in the Department for Transport document Manual for Streets. Paragraph 10.7 of Manual for Streets2 'Obstacles to Visibility' states that parking in visibility splays in built-up areas (such as Kings Hill) is quite common, yet does not appear to create problems in practice. An extract is provided below for ease of reference

Extract from Manual for Streets2 re visibility

10.7_ Obstacles To Visibility

10.7.1 Parking in visibility splays in built-up areas is quite common, yet it does not appear to create significant problems in practice. Ideally, defined parking bays should be provided outside the visibility splay. However, in some circumstances, where speeds are low, some encroachment may be acceptable. (See Example below.)

10.7.2 The impact of other obstacles, such as street trees and street lighting columns, should be assessed in terms of their impact on the overall envelope of visibility. In general, occasional obstacles to visibility that are not large enough to fully obscure a whole vehicle or a pedestrian, including a child or wheelchair user, will not have a significant impact on road safety.



4. Concerns regarding the Current Consultation

I would also like to point out that the details provided on the TMBC consultation website <https://www.tmbc.gov.uk/parking-transport/parking-review-kings-hill> are very confusing as the description doesn't mention parking restrictions, only the one-way traffic proposal for Fortune Way and Milton Lane, copied below for ease of reference:

Description from TMBC website re September 2023 consultation

September 2023

KCC are considering one-way traffic proposals for Fortune Way and Milton Lane, as a large proportion of Queen Street has not been adopted. Introducing roads with one-way traffic flows can have significant effect on the parking habits in those roads, and accordingly affects the wider parking proposals.

In light of this, and the time that has passed since the previous formal consultation was carried out, we are re-consulting and inviting objections on the revised proposals, with the elements in Fortune Way and Milton Lane that would be affected by a potential one-way traffic scheme withdrawn. The re-consultation runs from 22 September until 15 October 2023. The proposals have not significantly changed since the previous consultation, save for the areas affected by the potential changes to traffic flow in Fortune Way and Milton Lane.

The drawing included in the online consultation page indicates parking restrictions along a significant length of Regent Way whereas the list of locations in the Statement of Reasons does not list Regent Way and neither do the notices placed on lampposts along and near to Regent Way. This is confusing – are there restrictions proposed as per the drawing or as per the list in the Statement of Reasons? I would expect the Statement of Reasons and the notices to include all roads where the restrictions are proposed so that those affected can easily consider the proposals and if they are affected make their views known and for the Order to be valid (if approved).

Extract from Statement of Reasons

Kendall Avenue (at the junction with Regent Way)	New double yellow lines
Kings Hill Avenue (at the Silver Ball roundabout)	New double yellow lines
Lancer Drive (at the boundary of the adopted road)	Short lengths of double yellow lines to complement any restrictions that may be introduced to the unadopted areas.
McArthur Drive (at the junctions with Discovery Drive)	New double yellow lines
Melrose Avenue	New double yellow lines
Milton Lane (at the Fortune Way junction)	New double yellow lines
Pearl Way (at the junction with Regent Way)	New double yellow lines
Queen Street	New double yellow lines
Quindell Place (at the junction with Discovery Drive)	New double yellow lines
Richmond Avenue (at the Fortune Way junction)	New double yellow lines
Rougemont (at the junction with Discovery Drive)	New double yellow lines
Ruby Walk (at the junction with Regent Way)	New double yellow lines
Sunrise Way (at the junction with Regent Way)	New double yellow lines
Tower View	New bus stop clearways

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I am very concerned that the details of the consultation are so unclear and will result in members of the public not responding to this consultation exercise. In order to be transparent, open and accessible to residents and visitors to Kings Hill, who will be affected on a daily basis by the proposed parking restrictions, it is important that the consultation provides clear details of the proposal in a manner that is easy to access and understand. I feel that this is currently lacking.

The consultation is too general. Support/objections are sought for the whole list not specific to each road. This is too general there are roads listed which would be appropriate for parking restrictions such as Fortune Way and others where restrictions

are inappropriate such as Regent Way. A high level of support for restrictions on one of the roads listed will mean that restrictions are applied to the whole list. The support/objections should be separated to each road listed so that it can be seen where parking restrictions are supported and where they are not.

I have provided a copy of my previous letter below and the contents are still relevant to the current consultation. I would appreciate an acknowledgement that this letter, my previous letter/petition have been received and will be considered.

Kind Regards

A solid black rectangular redaction box covering the signature area.

[REDACTED]
 Kings Hill,
 West Malling,
 Kent,
 ME19 4EJ

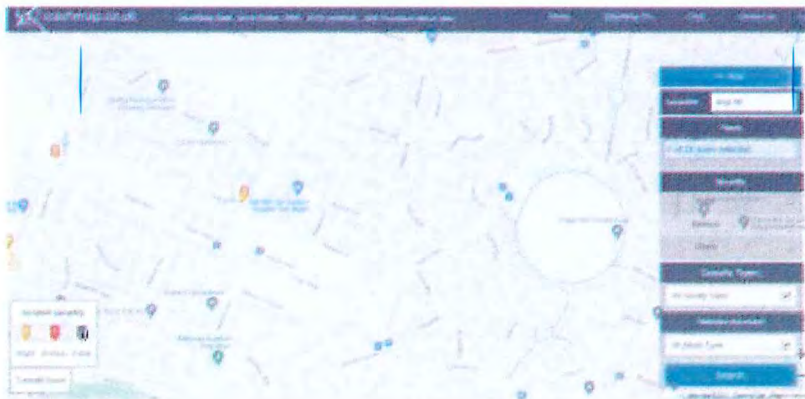
To parking.office@tmbe.gov.uk

Dear Sir/Madam

Kings Hill Parking Consultation July 2021

I refer to the consultation regarding parking restrictions on the adopted roads in Kings Hill.

I have lived here for some 19 years and I have never seen any issues relating to access for buses, deliveries or emergency services. On occasion there is need for some 'give and take' due to parked cars which act as traffic calming, reducing the available road space and reducing vehicle speeds. I fear that the removal of the on-street parking will lead to speeding issues and introduce a highway safety problem which currently does not exist. I attach an extract from Crashmap.co.uk which identifies personal injury crashes in the Kings Hill area for the latest 3-year period. You will see that there are very few and no crashes on Boverde Avenue or along Regent Way during the last 3 years, even though on-street parking took place during this period. I therefore wonder whether there is actual evidence of safety problems which have led to this consultation, or are these simply perceived problems raised by a few residents/visitors who would like to travel along these residential roads faster and without the 'give and take' that is currently needed to pass the parked cars.



Extract from Crashmap.co.uk

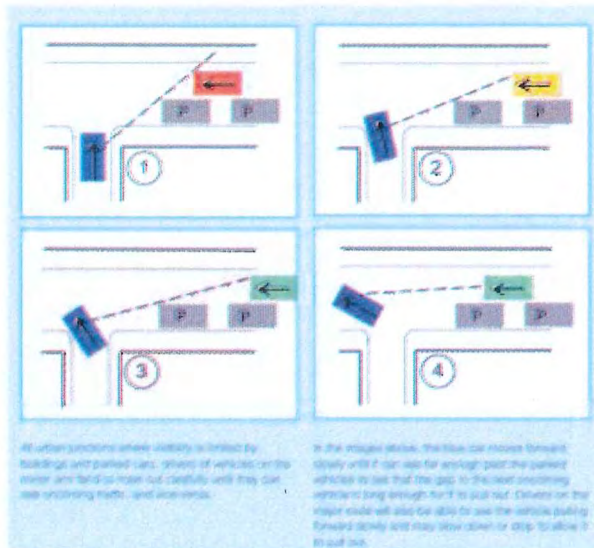
With regard to the parking at junctions I do not consider that there is a need for such extensive restrictions at the junctions and in particular at residential cul-de-sacs. In the case of the junction of Regent Way and Pearl Way, currently no parking takes place to restrict visibility. The only restriction to visibility is the landscaping at the junction.

which often becomes overgrown. I would like to point out that current guidance for visibility splays on residential streets as given in *Manual for Streets*, prepared by the Chartered Institute of Highways and Transportation (CIHT). Paragraph 10.7 of *Manual for Streets 2* "Obstacles to Visibility" states that parking in visibility splays in built-up areas (such as Kings Hill) is quite common, yet does not appear to create significant problems in practice. An extract is provided below for ease of reference:

10.7 Obstacles to Visibility

NOTE Parking in visibility splays in built-up areas is quite common, yet it does not appear to create significant problems in practice. Ideally, defined parking bays should be provided outside the visibility splay. However, in some circumstances, where spaces are few, some encroachment may be acceptable. (See Example below.)

NOTE The impact of other obstacles, such as street trees and street lighting columns, should be assessed in terms of their impact on the overall envelope of visibility. In general, occasional obstacles to visibility that are not large enough to fully obstruct a whole vehicle or a pedestrian, including a child or wheelchair user, will not have a significant impact on road safety.



Extract from *Manual for Streets 2*

To sum up I do object to the proposed parking restrictions in Kings Hill as I consider them to be excessive, unjustified and will lead to speeding issues and safety problems where there currently are none. Once such issues arise traffic calming will be required to address the problems, however due to lack of funding this is unlikely to be provided until there is a proven safety problem. The existing on-street parking already slows traffic speeds and acts as traffic calming, there is no proven safety problem, and no regular issues relating to access.

Yours faithfully

