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Highways and Transportation

Kroner House

Eurogate Business Park

Ashford

TN24 8XU

Tel: 03000 418181

Date: 14 June 2023

Our Ref:

Application - MBC/23/500899/OUT

Location - Land North Of The A20 Ashford Road Hollingbourne Kent

Proposal - Outline application for the erection a building for storage and distribution (Class B8 use) with a floorspace up to 10,788sqm (Gross External Area), ancillary offices, associated car parking, HGV parking, landscaping and infrastructure (All matters reserved except for access).

Thank you for your re-consultation in relation to the above planning application.

It is noted that the applicant has submitted a 'Traffic Impact Addendum' and a Technical Note entitled 'Response to KCC Comments' (both dated 19 May 2023).

KCC Highways has the following additional comments:

Site Access

Section 2.2 of the Technical Note (TN) indicates that a 25m separation distance is achieved between the centreline of the proposed site access and the existing Ashford Road slip road junction. Whilst KCC Highways accepts the accuracy of this measurement, the separation distance reduces to approximately 10m when measured between the closest corner kerblines.

The County Council's vehicle crossover guidance indicates how a 15m separation distance between the corner kerblines is appropriate on major roads. The TN does not clarify whether the access junction could be repositioned further to the west to achieve increased separation without compromising visibility sightlines.

Whilst KCC Highways maintains its concern over the proximity of the junctions, it is nonetheless accepted that the potential for hazardous conflicts between road users has not been raised in the Stage 1 Road Safety Audit. An objection on this basis would therefore be difficult to sustain.

Section 2.1 of the TN has confirmed how the speed survey conducted in closest proximity to the proposed site access location in October 2022 was used to derive 85th percentile speeds on Ashford Road. The speed survey data has been supplied to KCC Highways for review and is acceptable.

The TN and survey data also confirms that the methodology applied in calculating 85th percentile speeds is compliant with CA185 (Design Manual for Roads and Bridges) in terms of the timing of the surveys, number of surveyed vehicles and weather conditions.

It is understood that the October 2022 speed surveys supersede those that were available at the time of the Stage 1 Road Safety Audit in February 2022. This is appropriate in how it ensures visibility requirements are based on the most recent data available.

Section 2.3 of the TN confirms that a departure from standard is not required in respect of forward visibility on the eastbound approach to the junction. This is supported by updated drawings showing the vertical profile to an object height of 0.26m. The TN also draws attention to Appendix C of the Stage 1 Road Safety Audit, where the auditor confirmed the suitability of the 155m sightline illustrated on drawing ITB15323-GA-010/D. KCC Highways is therefore satisfied that the visibility requirements have been met.

Section 2.4 of the TN confirms that the applicant does not regard it to be necessary to provide a secondary emergency access. KCC Highways is mindful that such provision would provide increased resilience and mirror arrangements at the adjacent Woodcut Farm development site. It is recommended that the views of Kent Fire and Rescue are sought on this matter.

Walking and Cycling

Section 3.1 of the TN has confirmed that the proposed section of footway/cycleway on Ashford Road will narrow to 2.8m at the point it is constrained by land availability. This falls marginally below the recommended 3m width for shared use routes in Table 6.3 of Local Transport Note 1/20.

The TN also describes how the off-site footway/cycleway arrangements will tie in with those already planned in conjunction with the Woodcut Farm development. It confirms that one additional pedestrian refuge crossing is proposed to the east of the site access. Vertical visibility profile drawings have been provided to demonstrate that suitable forward visibility is achievable to/from the refuge to an object height of 0.26m.

Traffic Impact

The 2022 traffic count survey data has been supplied to KCC Highways for review and is acceptable.

Section 4.3 of the TN has quantified how the development is expected to generate up to seven additional trips at the Ashford Road/Willington Street junction in the peak periods. This forecast is derived from the analysis within the Transport Assessment, which had forecast 19% of vehicle trips to route through the junction. KCC Highways accepts that this impact is likely to fall within the daily variations in traffic flows and does not therefore warrant further capacity modelling analysis.

Section 4.4 of the TN provides an overview of committed developments in the local area. It is noted that the applicant has chosen to extract and add the traffic flows associated with Neighbourhood Plan land allocations in Lenham that have been the subject of planning applications and the consented Church Road development in Maidstone. This provides a

greater degree of robustness within the forecasts. The Traffic Impact Addendum (TIA) confirms that the traffic flows have been sourced from the relevant Transport Assessments.

The traffic flows associated with the other committed developments, which are largely in and around the Maidstone urban area and at varying stages of construction, have been assumed to be captured within the traffic surveys or background traffic growth. This replicates the methodology used within the Transport Assessment and KCC Highways previous comments on the limitations of this approach therefore remain pertinent.

Further junction capacity modelling has been undertaken to reflect the revised traffic flow forecasts for 2027 and 2037. This shows the site access junction to operate satisfactorily in both peak periods, thereby addressing Stage 1 Road Safety Audit recommendation A3.2.

At the A20/M20 link road roundabout, congestion is forecast to occur by 2027 irrespective of the proposed development. Although the additional development trips are shown to result in a further deterioration of conditions in the absence of intervention, the predicted increases to queuing are no greater than five PCUs (see Note 1) in the 2037 PM peak sensitivity test scenario. This does not represent a justifiable ground for objection.

Notes

(1) Passenger Car Units (PCUs) are a means of translating all types of vehicle into a common traffic 'currency'

Recommendation

On the basis of the information provided in the additional submissions, KCC Highways can now remove the holding objection.

KCC Highways does not therefore raise an objection to this planning application subject to the applicant being required to enter into a Section 278 Agreement to secure the highway layout alterations on Ashford Road.

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

- 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 the Travel Plan monitoring fee (£1,422) prior to the use of the site commencing.
- The development shall be implemented in accordance with the submitted Travel Plan. 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 measures to prevent the discharge of surface water onto the highway.
- Completion and maintenance of the access shown on the submitted plans prior to commercial occupation of 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 a 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.