



Maidstone Borough Council
Maidstone Planning Department
King Street
Maidstone
Kent
ME15 6JQ

Highways and Transportation

Kroner House

Eurogate Business Park

Ashford

TN24 8XU

Tel: 03000 418181

Date: 23 October 2023

Our Ref:

Application - MBC/23/504068/OU

Location - Land East Of Albion Road And North Of Copper Lane Marden Kent TN12 9EG

Proposal - Outline application with some matters reserved (access only sought) for the removal of 2 former agricultural sheds and erection of up to 117no. dwellings and associated infrastructure including partial footways on Albion Road.

Introduction

The proposals seek permission for outline permission with some matters reserved (*access only sought*) for the removal of 2 former agricultural sheds and erection of up to 117no. dwellings and associated infrastructure including partial footways on Albion Road.

Kent County Council (KCC) Highways note that the proposals are supported by a Transport Assessment (TA), which is dated August 2023 and was produced by I-Transport. I have the following comments to make in respect of it:

Access

Vehicular

Consistent with the requirements of the Kent Design Guide (KDG) access is proposed via a singular all purpose vehicular access onto Albion Road, with a secondary emergency only access also to be provided on Copper Lane. Even though the proposals will include amendments to the highway layout the applicant has not sought to provide a stage 1 Road Safety Audit (RSA), as is common practice. KCC Highways consider this to be a significant omission.

To determine the required visibility sight lines from the primary vehicular access the applicant undertook a traffic survey in February 2022 outside of school holiday periods. Whilst use of this data is acceptable in principle for assessment purposes, the raw data has not been provided for validation purposes. This should be provided.

Based upon the results of the traffic survey visibility sight lines of 2.4 by 49 meters to the right (*southbound*) and 2.4 meters by 44 meters to the left (*northbound*) are proposed. The TA indicates that the sight lines have not been adjusted to account for bonnet length in accordance with paragraph 7.6.4 of Manual for Streets.

This is incorrect as if considering junction, or forward visibility, typically the distance between the driver's position in the vehicle and front of the car bonnet is typically 2.4 meters. If the SSD is not adjusted for bonnet length, then the oncoming vehicle would hit the front of the car bonnet. Consequently, the visibility splays should be recalculated with bonnet length accounted for.

Whilst KCC Highways note that swept paths have been provided, this confirms that larger vehicles will be required to overrun adjacent traffic lanes when completing turning movements. The applicant considers this to be acceptable owing to the infrequent nature of such sized vehicles and the potential for excessive speeds, should a larger junction arrangement be provided.

Although KCC Highways would accept that movements by larger vehicles are likely to be infrequent, given the unconstrained and greenfield nature of the site, amendments to the junction should be considered to fully accommodate larger vehicles. This could include the use of overrunable areas, which would still maintain the appearance of a tighter junction, thus preventing excessive vehicle speeds.

Finally, the TA confirms that the proposed emergency only access would be secured via lockable bollards. This method is considered acceptable.

Visibility sight lines of 2.4 meters by 43 meters in either direction are also proposed from the emergency access. However, the applicant has not sought to demonstrate the suitability of these sight lines, despite the fact that Copper Lane is subject to the national speed limit of 60 mph. Appropriate justification should therefore be provided.

Pedestrian

To provide pedestrian connectivity with Marden village centre the applicant is proposing access via a nearby Public Right of Way (*PROW*), route KM821. Whilst KM821 does provide a link to the footways associated with nearby estates, KM821 is overgrown, unlit and lacks any form of natural surveillance. This is likely to significantly discourage route use.

The TA sets out whilst consideration was given to providing a footway that would link with the adjacent recently constructed development, this was not taken forward for several reasons, including the desire to maintain the rural characteristics of Albion Road. KCC Highways do not consider that a desire to maintain a rural appearance provides sufficient justification for not providing the optimum access strategy.

It is not currently considered that the applicant has demonstrated with sufficient confidence that safe pedestrian access can be achieved. The applicant should therefore be required to pursue the extension of the existing footway to the development access, particularly given how this would provide a quicker and clearer route to Marden village centre.

Off site highway works (including traffic calming)

The TA makes reference to the potential for a traffic calming scheme along Albion and Thorn Road, with an indicative scheme drawing appended to the TA. It is understood that this scheme is in response local concern, with elements of it included within the local highway improvement plan (*HIP*).

Unfortunately, the TA is definitive on what works are proposed as part of the development, with the TA simply indicating that a discussion would be welcomed on the matter. Consequently, the

applicant should be required to confirm the extent of highway works being proposed as part of the development.

Sustainability

Walking and Cycling

Section 4 of the applicant's TA consider the site's sustainability, including the propensity for walking and cycling trips. Whilst the TA correctly identifies that there are some local services and facilities within walking distance of the site, including a school, doctors, local shops and public houses, these are limited. Consequently, to some extent residents are likely to be reliant on the use of the private car to supplement their day-to-day needs.

KCC Highways consider it essential that in the interests of sustainability, as well as highway safety, safe and suitable pedestrian links to/from Marden village are provided.

Public Transport

Although Marden benefits from a mainline train station providing services to local and regional destinations at a good level of frequency, bus services are more sporadic. For example, there is only a limited range of services to/from Maidstone on a day-to-day basis, with residents having to interchange at other stations should they wish to access Maidstone by rail. To some degree this is likely to discourage trips by alternative more sustainable means.

Trip Generation

The development is anticipated to generate 61 trips (*combined arrivals and departures*) in the AM peak and 63 trips in the PM peak.

To derive the trip generation forecasts the applicant has interrogated the TRICS database focusing on sites in an 'edge of town' location. Whilst KCC Highways consider that the sites selected broadly reflect the development's locational characteristics there are concerns about the inclusions of TRICS sites ES-03-A-08, given how it is located in a larger town near to regular bus and train services. This contrasts to the development site which whilst near to a mainline train station with a good frequency of service, it limited bus services. Sensitivity testing should therefore be completed.

Trip Distribution and Assignment

KCC Highways note that the applicant anticipates the majority (78%) of development trips to route north via the A229, or other available northerly routes.

To reflect the fact that people undertake trips for different reasons including employment, education and leisure the applicant has utilised two different assessment methodologies. Employment trips have been distributed using Census Travel to Work Data, whilst trips for all other purposes have been distributed based upon a gravity model.

Although KCC Highways remain mindful that 2021 Census data is now available, given how it was collected during the Covid-19 pandemic it is considered to be skewed. Resultingly, whilst dated it is considered that 2011 Census data provides a more robust basis for assessment.

Development trips have been assigned across the network via the available routes by the applicant using a real time journey planner (*Google Journey Time Planner*). KCC Highways consider this approach acceptable, given how it identifies route options based upon actual

traffic conditions. Importantly, this reflects the propensity for motorists to make journeys using the route that affords the quickest journey time.

Assessment Methodology

To assess the impact upon the local highway network the applicant undertook traffic surveys on Thursday 16th June 2022 across the study area. Given how the surveys were undertaken outside of any Covid-19 restrictions in a traffic neutral period in the last 3 years, KCC Highways consider that they provide a suitable basis for assessment purposes.

Whilst the outputs for the capacity assessments have been provided the raw traffic survey data has not been provided. This should be provided for validation purposes. Use of Temprow growth factors for forecasting purposes is also considered acceptable.

Traffic Impact

Site Access junction with Albion Road (*Priority Junction*)

The applicant's capacity assessment confirms that following the addition of the development traffic the junction will operate within capacity, without any unacceptable levels of queuing or delays.

Albion Road junction with Plain Road (*Priority Junction*)

The applicant's capacity assessment confirms that following the addition of the development traffic the junction will operate within capacity, without any unacceptable levels of queuing or delays.

Albion Road junction with High Street and Howland Road (*Priority Junction*)

The applicant's capacity assessment confirms that following the addition of the development traffic the junction will operate within capacity, without any unacceptable levels of queuing or delays.

B2079, High Street junction with B2079, Maidstone Road (*Priority Junction*)

The applicant's capacity assessment confirms that following the addition of the development traffic the junction will operate within capacity, without any unacceptable levels of queuing or delays.

West End junction with Pattenden Lane and Church Green (*Priority Junction*)

The applicant's capacity assessment confirms that following the addition of the development traffic the junction will operate within capacity, without any unacceptable levels of queuing or delays.

Parking, Turning and Servicing

As only outline permission with access is sought at this time matters, including the site's internal layout, will be assessed as part of a future reserved matters application. On this basis, KCC Highways have no comments to make in respect of these matters at this time.

Personal Injury Collision (PIC) Record

PIC data has been obtained and analysed by the applicant, with the results confirming that during the period in question 11 collisions occurred. All these collisions were '*slight*' in severity with no serious or fatal collisions recorded in the study area. 3 collisions occurred on the B2079

or at Chantry Roads junction with Church Green, with the remaining occurring across the study area.

Neither the highway layout or any defects within it are listed as a contributory factor in any of the collisions, with driver error a factor in all of them. KCC Highways therefore accept that the development will not exacerbate any pre-existing highway safety issues across the wider network.

Summary and Recommendation

KCC Highways wish to raise a ***holding objection*** to the proposals on the basis that the applicant should be required to provide the following additional information:

- Submission of a stage 1 RSA and supporting designer's response;
- Submission of the raw traffic survey data used to derive the visibility splays from the primary vehicular access;
- Recalculation of the visibility splays from the primary vehicular access, with bonnet length accounted for;
- Amendments to the junction layout to fully accommodate larger vehicles, without the overrunning of adjacent traffic lanes;
- Submission of appropriate evidence to demonstrate the suitability of the visibility sight lines from the emergency only access;
- Submission of a revised pedestrian access strategy;
- Confirmation of the extent of off-site highway works being offered as part of the development;

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.