



Technical Note

Highways Review

Project	21/505722/OUT - High Street, Newington	Job No	1000007836
Subject	Highways Review	Issue	02
Prepared by	OR/RF	Date	16/12/2022
Approved by	BM	Date	16/12/2022

Introduction

- 1.1 Swale Borough Council (SBC) commissioned Project Centre (PCL) to provide a Technical Note (TN) reviewing highway matters relating to:
 - Outline application for demolition of existing residential dwelling and erection of up to 46 residential dwellings, including affordable housing, with access from A2 High Street (Access only being sought).
- 1.2 A Transport Assessment (TA) and Design and Access Statement were submitted in support of the application in October 2021.
- 1.3 Subsequent information has been submitted by the applicant for consideration, which is identified below.
- 1.4 To summarise:
 - Overall, the design of the access is in line with the Kent Design Guide and is acceptable in principle, subject to detailed design.
 - In relation to the visibility assessment reviewed:
 - Visibility is achievable to the required splays, at an offset of 0.29m, which is minor and is deemed acceptable.
 - These types of direct access on the High Street (A2) seem commonplace, with several vehicles required to reverse onto or from High Street (A2) for residential access.



- A review of the Personal Injury Collision (PIC) data provided as part of the TA does not show any apparent cause for accident when accessing these dwellings.
- We accept the comments made by KCC Highways in relation to the slight offset in visibility splay and acknowledge that the 20mph speed reduction to the west of the access will also help mitigate vehicle speeds on this approach.
- With that said, we advise that should outline planning permission be granted, a condition is attached requiring the visibility splays to be reassessed using topographical data to ensure confidence in accuracy of the achievable splays.
- We have our concerns relating to retaining access to 132 High Street, however, acknowledge that no other alternative can be provided which suits both existing and proposed land uses. It is also acknowledged that the manoeuvre into the existing access is not ideal, and the proposal appears no worse.
- The identified section of PROW ZR61 should be upgraded to facilitate pedestrian movements to and from the site. If this is not considered feasible, then a formal crossing point should be provided in the vicinity of the main site access to fully facilitate journeys on foot, especially trips to and from Newington train station.
- The TRICS assessment is considered suitable for a development of this size.
- A Travel Plan (TP) is required to support the application, should it be progressed to help mitigate the issues identified and promote sustainable travel within the immediate area. This should be secured via a planning condition.



KCC Highways and Newington Parish Council Comments

- 2.1 KCC Highways has provided commentary in relation to highways matters, which are provided in Appendix A. Comments raised by Railton, an independent transport consultant, acting on behalf of Newington Parish Council are also provided.
- 2.2 We have taken into consideration the points raised by KCC and Railton as part of this review.

PCL Review

- 3.1 Our review of the submitted information relating to the proposed access arrangement is discussed below and includes:
- DHA's Transport Assessment (TA) dated September 2021,
 - DHA's Transport Technical Note (TN) dated March 2022,
 - Visibility Splay Drawing: H-01 – P4,
 - Vehicle Swept Path Drawing: T-03-P1,
 - Design and Access Statement (DAS),
 - Correspondence from or on behalf of KCC and Newington Parish Council.

Proposed Access

- 3.2 The applicant seeks outline planning permission for a vehicle and pedestrian access onto High Street (A2), for up to 46 residential dwellings.
- 3.3 To accommodate the proposed access, it is understood that 128 High Street (residential dwelling) is to be demolished to provide appropriate width for a minor access road, in line with the Kent Design Guide. This includes:
- 5.5m wide carriageway,
 - 6m kerb radii at access,
 - 1.8m wide footway and verge on western side of access (3.6m wide total).
- 3.4 We note the design outlined in the TA and that shown in Drawing: H-01 – P4, shows different kerb radii of 12m. We assume these radii were increased to



accommodate larger vehicles accessing the site from High Street (A2), as shown in the refuse tracking plans provided in Appendix H of the TA.

- 3.5 We acknowledge that swept path analysis has been provided for a 4.71m estate car, demonstrating access to and from the site from High Street (A2).
- 3.6 Overall, the design of the access is in line with the Kent Design Guide and is acceptable in principle, subject to detail design. Additional comments in relation to access to 132 High Street are discussed in a later section.

Visibility

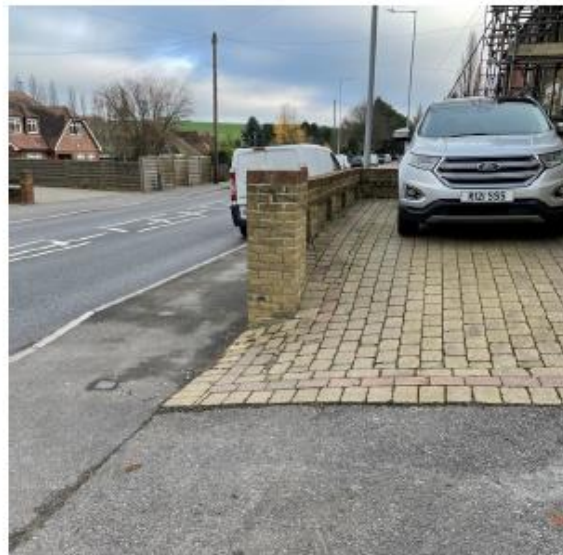
- 3.7 The applicants visibility assessment includes:
- Original visibility splay assessment of 2.4m x 42.5m to the west and 2.4m x 54.8m to the east, measured '1m from channel line'.
 - Following comments from KCC Highways, visibility plans were revised noting 2.4m x 42.5m to the west and 2.4m x 38.4m to the east (or 2.4m x 43m if measured 0.29m from the channel line).
 - The 0.29m offset was considered acceptable by KCC given the presence of drainage gullies to influence the positioning of motorbikes. In addition, it was noted that a 20mph speed restriction has recently been introduced just to the west of the access, and this is likely to reduce speeds on the approach.
- 3.8 As per the latest access drawing appended to the submitted TN, third party land is used at 132 High Street to achieve the visibility splay. We acknowledge the concerns raised by Railton in relation to this, however, a 0.29m offset is considered relatively minor.
- 3.9 Following a site visit in December 2022 by PCL, we note:
- The neighbouring property at 132 High Street has an existing 1.5m high wall at the back of the footway. It is unlikely that this property will build the wall out any further as this would block their off-street parking access.
 - These types of direct access on the High Street (A2) seem commonplace, with several seeming to require vehicles to reverse onto or from High Street (A2) for residential access.
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- A review of the Personal Injury Collision (PIC) data provided as part of the TA does not show any apparent cause for accident when accessing these dwellings.
 - We accept the comments made by KCC Highways in relation to the slight offset in visibility splay and acknowledge that the 20mph speed reduction to the west of the access will also help mitigate vehicle speeds on this approach.
- 3.10 If the proposal is to be granted planning permission, we advise that a condition is attached requiring the visibility splays to be reassessed using topographical data to ensure confidence in accuracy of the achievable splays.
- 3.11 We note the applicants drawings are based on OS mapping, which does come with a degree of inaccuracy and does not accurately depict the existing wall at 132 High Street.
- [Access to 132 High Street](#)
- 3.12 In relation to 132 High Street:
- It is understood that vehicle access is to be retained, with vehicles relating to this dwelling anticipated to turn onto the new access road before reversing into the existing driveway.
 - The current arrangement requires vehicles to reverse onto the driveway from High Street (A2).
- 3.13 KCC Highways commented:
- The proposed access arrangement was reviewed and it was considered that the swept path analysis was assisted by the new junction when turning into the existing property.
 - Also, that the lower levels of activity and speed along the site access than the A2, would mean less chances of conflict than at present.
 - The proposed junction has been subjected to an independent Stage 1 Road Safety Audit, and this has not raised any concerns over the design of the access.
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- 3.14 We acknowledge comments made by Railton, noting the RSA Stage 1 did not identify any safety issues relating to the parking area at 132 High Street, which was a potential omission by the safety auditor.
- 3.15 While we cannot confirm this, we do agree that no evidence has been provided to support the statement in the Technical Note that "adequate visibility to a vehicle accessing the parking space can be achieved from approaching vehicles on the A2".
- 3.16 As shown in Figure 1, the carriageway of High Street (A2) is set some distance below the parking area of 132 High Street, which could impede visibility for left turning vehicles into the site, when vehicles are reversing into the parking area of 132 High Street.

Figure 1: Visibility to East on High Street (A2) With Identified Parking Area



- 3.17 That said, we note that movements relating to the site and 132 High Street are relatively low and conflict between these two movements would be unlikely.
- 3.18 Although we have our concerns relating to retaining access to 132 High Street, we acknowledge that no other alternative can be provided which suits both



existing and proposed land uses. It is also acknowledged that the manoeuvre into the existing access is not ideal, and the proposal appears no worse.

- 3.19 In addition, it is considered under the discretion of the highway authority to make the final decision around the suitability of the access arrangement, which KCC Highway are satisfied with the additional information provided by the applicant.

Pedestrian Links

- 3.20 As mentioned, a 1.8m footway is proposed on the western side of the access, which is in line with the Kent Design Guide. It is understood that a 1.0m footway will be provided around the eastern junction shoulder, to facilitate crossing opportunities across the mouth of the junction which will be provided with tactile paving and dropped kerbs. This is supported.
- 3.21 We do have some concern relating to the lack of pedestrian crossing facilities on Hight Street (A2), which will allow future residents to access local facilities including Newington railway station.
- 3.22 KCC Highway comments relating to pedestrian accessibility to and from the site, note:
- Westbound journeys on foot from the access would require crossing the A2/High Street, and that there would be insufficient carriageway space to create a pedestrian refuge. However, the carriageway is of a width and visibility along this section sufficient that it can be crossed by most pedestrians in safety.
 - The site also offers pedestrian connectivity to Callaways Lane and footways linking to the village centre via recent development at The Tracies, utilising part of PROW ZR61. This route lies on more of a direct desire line towards local amenities on High Street, when coming from the proposed dwellings.
 - As a minimum, the section of PROW ZR61 that facilitates this link would therefore need to be improved to the standard recommended by Public Rights of Way in their consultation. This link is confirmed on the submitted movement parameter plan and would therefore expect it to be realised if this site were to come forward for reserved matters.
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- If it appears that it was not viable, for any reason, then we would reserve the right to request the creation of a crossing point in the vicinity of the main site access to fully facilitate journeys on foot.
- 3.23 It is acknowledged that High Street (A2) is constrained in relation to available carriageway width, however, providing no enhanced pedestrian connectivity goes against both KCC and Swale planning policy, specifically those relating to providing infrastructure to support trips by sustainable transport.
- 3.24 Callaways Lane and The Tracies does provide more direct access into the site from the High Street retail area and Newington train station, however, also provided narrow footpaths which will not be suitable for all users.

Figure 2: Callaways Lane Looking South



- 3.25 With that said, this route does avoid the need for crossing High Street (A2). If pedestrian access was to be only via the A2, pedestrians traveling to and from the west would be forced to cross the main road, due to the southern footway stopping abruptly approximately 100m west of the proposed access point.
- 3.26 A signalised crossing is provided on High Street (A2), within Newington (west of Callaways Lane), which will help accommodate those crossing the road, when travelling to and from the village centre and Newington train station.

Figure 3: High Street (A2) Looking West



- 3.27 In line with KCC Highway comments, we agree that at a minimum, the identified section of PROW ZR61 should be upgraded to facilitate pedestrian movements to and from the site. If this is not considered feasible, then a formal crossing point should be provided in the vicinity of the main site access to fully facilitate journeys on foot.
- 3.28 Failing to provide any improvements to pedestrian infrastructure within the immediate area, notably PROW ZR61 and then subsequently High Street (A2) (if upgrades to PROW ZR61 are not feasible), would result in a noncompliance with:
- Local Transport Plan 4 (LTP4): Delivering Growth without Gridlock 2016-2031
 - Outcome 3: Safer travel - Policy: Provide a safer road, footway and cycleway network to reduce the likelihood of casualties and encourage other transport providers to improve safety on their networks.



Trip Generation and Assessment

- 3.29 We have reviewed the trip generation analysis as part of the TA and the TRICS outputs provided in Appendix I. We consider these suitable for a development of this yield.
- 3.30 We note that the site will generate around 20 and 21 two-way trips in the morning and evening peak periods, respectively. This equates to around one vehicle exiting or entering the site every three minutes during the peak periods, which is considered low.
- 3.31 As highlighted by KCC, once these trips are further distributed across the network, the volume of traffic would not be considered severe in relation to NPPF and is unlikely to impact on this section of the highway network, which we would agree with.

Travel Plan

- 3.32 It is considered that a Travel Plan (TP) is required to support the application, should it be progressed.
- 3.33 The site is in Newington Air Quality Management Area (AQMA) and therefore sustainable modes of travel to and from the site should be promoted to ensure the already low levels of acceptable air quality are not exacerbated by increasing traffic on the network.
- 3.34 Although we acknowledge that this development as standalone would not cause severe traffic impacts, we are aware of several residential developments within the immediate area which are under consideration or committed.
- 3.35 These developments combined will have a cumulatively impact on the road network (in relation to capacity and air quality) and therefore sustainable incentives should be promoted from the start if outline planning permission is granted.
- 3.36 The TA notes that the proposals are seen to comply with all relevant national and local transport planning policies, however, no considerations have been made by the applicant relating to:
- Local Transport Plan 4 (LTP4): Delivering Growth without Gridlock 2016-2031,
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- Outcome 2: Affordable and accessible door-to-door journey - Policy: Promote affordable, accessible and connected transport to enable access for all to jobs, education, health and other services.
- Outcome 4: Enhanced environment - Policy: Deliver schemes to reduce the environmental footprint of transport and enhance the historic and natural environment.
- Outcome 5: Better health and wellbeing - Policy: Provide and promote active travel choices for all members of the community to encourage good health and wellbeing and implement measures to improve local air quality.
- Bearing Fruits 2031: The Swale Borough Local Plan (2017),
 - Policy CP2 – Promoting Sustainable Travel,
 - Policy DM6 - Managing transport demand and impact.

3.37 It is considered that a TP could help mitigate the issues identified and promote sustainable travel within the immediate area. The TP should be secured as part of a planning condition, should outline planning permission be granted.

Conclusions

4.1 To conclude:

- Overall, the design of the access is in line with the Kent Design Guide and is acceptable in principle, subject to detailed design.
 - In relation to the visibility assessment reviewed:
 - Visibility is achievable to the required splays, at an offset of 0.29m, which is minor and is deemed acceptable.
 - These types of direct access on the High Street (A2) seem commonplace, with several vehicles required to reverse onto or from High Street (A2) for residential access.
 - A review of the Personal Injury Collision (PIC) data provided as part of the TA does not show any apparent cause for accident when accessing these dwellings.
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- We accept the comments made by KCC Highways in relation to the slight offset in visibility splay and acknowledge that the 20mph speed reduction to the west of the access will also help mitigate vehicle speeds on this approach.
 - With that said, we advise that should outline planning permission be granted, a condition is attached requiring the visibility splays to be reassessed using topographical data to ensure confidence in accuracy of the achievable splays.
- We have our concerns relating to retaining access to 132 High Street, however, acknowledge that no other alternative can be provided which suits both existing and proposed land uses. It is also acknowledged that the manoeuvre into the existing access is not ideal, and the proposal appears no worse.
- The identified section of PROW ZR61 should be upgraded to facilitate pedestrian movements to and from the site. If this is not considered feasible, then a formal crossing point should be provided in the vicinity of the main site access to fully facilitate journeys on foot, especially trips to and from Newington train station.
- The TRICS assessment is considered suitable for a development of this size.
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Appendix A – KCC & Newington Parish Council Commentary



KCC Highways Review Comments

KCC's Highways and Transportation Team has provided commentary in relation to highways matters, which are summarised below. We have therefore taken into consideration the points raised by KCC as part of our review.

Response Dated 4/02/22

- Trip Generation
 - KCC were satisfied with the submitted TRICS trip rates presented in the applicant's TA and considered these to be robust in accordance with accepted practice.
 - Trip rates were provided for the site, noting 46 dwellings would generate 21 vehicle movements in the AM peak hour and 20 vehicle movements in the PM peak hour.
 - Trip Distribution
 - KCC accepted that additional vehicle movements would not result in a very negligible impact on the local highway network., however, because additional movements would be generated, Section 106 contributions were sought, as part of a condition, to undertake planned highway capacity improvements at the nearby Key Street roundabout.
 - Access Proposals
 - New access road is noted to be provided in accordance with Kent Design Guide principles to adequately serve the proposed size of development and cater to pedestrian movements.
 - A stage 1 Road Safety Audit (RSA) was undertaken and its recommendations approved, however KCC requested tracking plans to be submitted to address the recommendations.
 - Visibility splays provided caused some concern to KCC Highways, who questioned whether the footway to the east of the access road was in fact 2.5m as shown on the access plan, and therefore whether adequate splays could be achieved.
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- Pedestrians travelling eastwards would have to cross the A2, where there is no crossing facility at present, and KCC notes there is insufficient width to install a pedestrian refuge.
- Parking Provision
 - Parking was acknowledged to be addressed at the reserved matters stage.

Response Dated 18/03/22

- Additional information submitted at this stage included access drawings addressing the Road Safety Audit, with revised sightlines shown. However, in regard to the visibility splays, KCC deemed that a 43m y-distance would be the requirement to be drawn from the carriageway edge.
- KCC noted that access arrangements for 132 High Street would need to be re-addressed, due to the existing vehicular access for Number 132 being directly on top of the proposed junction radius. The applicant was required to submit further details to alleviate this concern.

Response Dated 25/08/22

- The applicant submitted a Transport Technical Note (TN) dated March 2022 in light of comments previously made by KCC. The TN provided an update access drawing illustrating turning movements could be made from 132 High Street using the newly proposed junction (access road into the site) without vehicles having to overrun onto the A2.
- KCC were satisfied with the submitted swept paths, and therefore no further concerns were raised over the design of the access.
- Furthermore, the TN illustrated that the previously requested visibility splays could be achieved for a 30mph road. This was deemed acceptable and KCC also noted that a 20mph speed limit had been introduced west of the proposed access, outside No. 63 High Street, which, they reported, is likely to slow eastbound traffic down further.

Response Dated 5/09/22

- Additional information submitted at this stage concerned a Mineral Resource Assessment, which did not alter the Highway Authority's views on the development proposals.
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- A number of conditions were requested by KCC, including:
 - Submission of a Construction Management Plan (CMP);
 - Provision and permanent retention of vehicle parking spaces and garages shown;
 - Provision of Electric Vehicle Charging Points (EVCP) for each dwelling;
 - Provision and permanent retention of cycle parking facilities;
 - Completion and maintenance of the access; and
 - Section 106 contributions towards highway improvements to Key Street.

Newington Parish Council Comments

[Response Dated 27/08/22](#)

Newington Parish Council commissioned Railton TPC Ltd to carry out a review of the transport and highways implications of the development associated with this planning application.

It is noted that this objection was submitted after the submission of the applicant's TN mentioned above (dated March 2022), however, the objection does not take the TN and its amendments into consideration.

The main objections raised by Railton on behalf of Newington Parish Council include:

- Highway safety at proposed site access, namely visibility splays, which the objection deems unacceptable due to being 1m offset from the carriageway and only achieving 39m visibility to the east of the access;
 - Lack of a safe pedestrian route to local facilities and a critique of the highway authority's judgment that the carriageway at this section of the A2 is of sufficient width and visibility for the majority of pedestrians to traverse without difficulty, which, the objection deems unacceptable due to the difficulty posed to vulnerable road users of not having sufficient width for a pedestrian refuge island;
 - Lack of mitigation for increased vehicle movements at the Key Street roundabout (KCC later request a S106 contribution for such improvements);
 - Lack of credible air quality mitigation, namely:
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- A contribution towards a local e-bicycle hire scheme being inappropriate for the location of the development; and
- Contributions towards an annual bus pass for each dwelling and a three-year National Railcard per dwelling being unlikely to shift 10% of vehicle trips to public transport due to lack of capacity on buses and infrequency of rail services.
- Failure to consider cumulative impact – the objection suggests the highway authority have not given enough consideration to other development sites locally and states that locally, the cumulative traffic impact could be severe.

[Response Dated 14/11/22](#)

Further to the Parish Council's objection dated in August 2022, a further submission was made having considered further submitted information from the applicant. This review highlights the following key highway concerns:

- That the new access road is inappropriate considering the proposed intensification of the site;
- That a further RSA should be undertaken due to the access arrangement having changed since the first drawings were submitted in support of the application;
- Once again concerns are mentioned in regards to the overall impact on highway safety and discourages additional vehicles being added to the local highway network.