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## TRANSPORT TECHNICAL NOTE

**Site:** Land to the South of School Lane, NEWINGTON

**Response to Railton note (7<sup>th</sup> February 2023) provided by Newington Parish Council**

**Prepared by: DHA, Eclipse House, Eclipse Park, Sittingbourne Road, Maidstone**

**Date:** June 2023

### INTRODUCTION

- 1.01 Railton provided a note dated 7th February 2023 to Newington Parish Council (NPC) which has been referred to by NPC and submitted as part of its response to the current planning application.
- 1.02 Similar Railton opinions were provided by NPC to the previous planning application at the site (21/504028/FULL).
- 1.03 Kent County Council Highways & Transportation (KCC H&T) raised no objection to either 21/504028 or the current application, subject to conditions and contributions to be secured through a Section 106 Agreement: these have been agreed between Swale Borough Council (SBC) and Fernham Homes. Whilst 21/504028 was refused planning permission on landscape grounds, there was no reason for refusal related to highways.
- 1.04 The Railton responses have been reviewed by DHA Transport and DHA Planning which prepared the Transport Statements and Planning Statements for the previous and current applications. DHA Transport and DHA Planning have provided joint comments on the Railton conclusions.

### **A) Railton point 1: the site has very poor access to bus services**

#### **DHA response:**

- 2.01 The site is accessible to bus stops and Newington train station. They are within 10 - 11 minutes' walk, along pedestrian footways which are subject to street lighting.
- 2.02 Railton's focus on bus services ignores the fact that the site is very accessible to a number of other local facilities and services, ensuring that a significant proportion of day-to-day needs can be met through walking, as shown below (Table 2.1 from the Transport Statement accompanying the application).

Facility	Walk Distance (metres)	Walk Time (Minutes)
Primary School (Newington C of E School)	50 metres	1 minute
Church (St Mary the Virgin)	350 metres	4 minutes
Pharmacy/Post Office	700 metres	9 minutes
Take Away (Mings Chinese)	700 metres	9 minutes
Public House (The Bull)	750 metres	9 minutes
Convenience Store (Coop Food)	750 metres	9 minutes
Bus Stop (A2 High Street)	800 metres	10 minutes
Railway Station (Newington)	900 metres	11 minutes
Village Hall	900 metres	11 minutes

2.03 This is recognised in the report to the March 2023 SBC Planning Committee on the current application:

- paragraph 9.12 “it [the site] is well located for housing in respect of future occupants being able to access services and facilities via sustainable travel methods including walking and cycling”
- paragraph 9.13 “Newington has a reasonable array of services within walking distance of the site, including a train station, pub, school, shops, access to bus routes, and a cricket club. As such, it can be said that the site is in a sustainable location for the purposes of Paragraph 10 of the NPPF”.

**B) Railton point 2: The assessment of highway safety records is out of date and needs to be revised**

**DHA response:**

3.01 The following plan shows the data held by Kent County Council on crashes which resulted in injury on the surrounding road network for the 5 year period of 1st October 2017 – 30 September 2022.

3.02 This clearly shows that all were caused by individual error rather than the layout or condition of the highway network itself, and that the vast majority resulted in ‘slight’ injuries.



Location	Severity	Date	Description
1	Slight	07/11/2017	Pedestrian crossed from Station Road to Bull Lane at the same time a car was turning and cancelled the indicator and collided with one another. Briefly stopped and then drove off.
2	Slight	13/11/2017	Car stationary on High Street, Newington waiting to turn right onto Church Lane as motorcycle tried to overtake the car turning right through filtered traffic. Both vehicles travelling west towards Rainham.
3	Fatal	05/04/2018	7.5 tonne goods vehicle waiting at roadworks, pedestrian on foot crossing the road south to north in front of the lorry. Road worker controlling traffic signalled the goods vehicle to move forward and collided with the pedestrian, causing fatal injuries.
4	Slight	18/04/2018	Pedestrian on non-motorised scooter riding on the pavement along Church Lane and fell off into the road, made contact with a car travelling slowly in the opposite direction.
5	Slight	02/05/2018	One car collided into the rear of another after coming over the brow of the hill outside Ashton Burkinshaw lettings. Car collided into was stationary at time of impact.
6	Serious	21/01/2019	Car pulling out of Bull Lane to the right hit by a motorbike on the right-hand side of the car. Motorcyclist has come off the bike and broke their left femur.
7	Slight	20/11/2019	Pedestrian slipped off pavement into the road and was hit by the moving car's wing mirror. One witness stated that the pedestrian ran into the road.
8	Serious	25/11/2019	Minibus turning right out of Bull Lane, car sped up through amber/ red light and crashed into the front of the ambulance.
9	Slight	21/04/2020	Motorcycle approached blind bend on the opposite side of the road and due to speed of the motorcycle could not take evasive action. Head on collision between car and bike.
10	Slight	11/06/2021	Pedestrian mowed down by electric scooter outside Coop doorway. Cuts and grazes to knees and ankle.
11	Slight	05/08/2021	Car travelling south down Wardwell Lane and continuing onto Church Lane collided with a car turning right out of Iwade Road.

**School Lane, Newington  
Accident Data  
June 2023**

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**C) Railton conclusions 3, 4, 5 and 6:**

- The proposal will generate car trips using Church Lane and passing the school on School Lane in the peak hours and during school drop-off and pickup periods
- The parking area for school staff and parents will make it more likely for more cars to drive past the school
- Church Lane is sensitive to changes in traffic levels due to on-street parking, narrow or absent footways and its function as the main access to the school for those on foot
- It is likely that increased vehicle queuing and delays resulting from additional traffic using Church Lane will have an adverse impact in terms of highway safety on the A2 and at the A2/Church Lane junction

**DHA Response**

4.01 Car park

- There is an existing car park at the site, on a short term lease, which is well used.
- Surveys by Fernham Homes have indicated up to 33 cars parked here at school pick up time. These parents already drive past the school.
- Without the car park there would be increased parking in surrounding residential areas/on School Lane. Double yellow lines will be extended by approximately 130m to the north along School Lane as part of the development.
- KCC “Children, Young People & Education directorate” stated on 20<sup>th</sup> October 2021:
  - *“there is a clear need for a permanent car parking and drop off area to ensure that the school has appropriate facilities to operate at the school’s maximum capacity”.*
  - *“since the temporary area has been made available, NCEPS have reported a significant improvement in traffic flow outside the school in peak hours, reducing idling cars and therefore improving air quality around the school and increased pedestrian safety”.*

4.02 Impact on Church Lane

4.03 The number of trips (as agreed with KCC H&T) that would be generated by the housing proposed are:

	Time	Total	Total using Church Lane
<b>AM peak</b>	08.00 – 09.00	15	12
<b>PM peak</b>	17.00 – 18.00	12	10
	07.00 – 19.00	117 (i.e. 9.75 per hour, i.e. an additional car every 6 minutes)	

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4.04 Whilst cars do park on Church Lane, KCC H&T agrees that there are adequate passing places along it.

4.05 The following table indicates (from pre-Covid traffic counts) the levels of traffic at the A2 / Church Lane junction and the percentage increase that additional traffic from the development would have.

Time	No. vehicles on A2	% increase	No. vehicles on Church Lane	% increase	No. vehicles using junction	% increase
08.00 – 09.00	1,107	1.08%	196	6.1%	1,303	0.9%
17.00 – 18.00	1,207	0.8%	125	8%	1,232	0.8%

4.06 It is commonly accepted that traffic levels vary by c.10 – 15% per day. The increases in vehicles using Church Lane, the A2 and the junction is considerably less than this. KCC H&T’s response to the previous application (21/504028/FULL) on 4<sup>th</sup> May 2022 was that traffic increase levels are “negligible”, and KCC H&T does not raise concerns regarding highway safety at this junction.

4.07 There are pedestrian footways along the whole length of Church Lane, and the works to be secured through the development will provide a further footway from Blaxland Grange to the car park: at present none exists. The existing 20 mph speed limit will be extended 50m to the north along School Lane. KCC H&T raise no concerns regarding pedestrian safety

**A) Railton conclusion 7: air quality**

5.01 Please see response provided by Fernham Homes regarding air quality under separate cover.

**B) Railton conclusion 8: The proposals will have a significant adverse impact on the landscape of Bricklands and School Lane, designated as rural lanes.**

**DHA Response:**

6.01 The number of additional trips to be generated – as agreed with KCC H&T - through the housing element (an average of 1 every 6 minutes) will not have a tangible impact on the landscape or tranquillity of the lanes – as reflected in paragraph 9.44 of the report on the current application to the SBC Planning Committee in March.

6.02 The road widening, footway and kerbs proposed along School Lane will not significantly alter the character of School Lane – it will still appear as a very verdant lane, with strong vegetation and hedgerows forming the boundaries of the agricultural land to the south of the cemetery, the north eastern edge of the school and the boundary of Shenley, the house to the north of the modern development on the north-eastern corner of School Lane, and the site itself. Paragraphs 9.46 and 9.47 of the report on the current application to the SBC Planning Committee in March sets out that the character of lanes would be conserved.

6.03 The extension of the 20 mph zone to the north will mean that cars will not travel faster through this area, contrary to Railton’s assertion.

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**C) Railton conclusion 9: It is unlikely that the proposed earthworks on the western side of School Lane in the vicinity of the school could be implemented while maintaining a footway of a width that meets relevant standards**

**DHA Response:**

7.01 KCC H&T will have considered this point in reaching its conclusion that the off-site highway measures are acceptable. The footway is shown to be 1.5m in width, to deter parking on School Lane and to reduce the earthworks that will be required to implement the footway KCC H&T have agreed that a double height kerb shall be installed along the roadway to 'build up' the footpath. A simple low level brick retaining structure of less than 500mm in height will be capable of retaining the earth embankment.

**D) Railton point 10: No assessment has been made of the cumulative impact of the proposals in the context of numerous other developments in the local area**

**DHA Response**

8.01 KCC H&T will have been aware of the various committed and proposed schemes in the area, did not request that these be assessed, and is satisfied with the robustness of the Transport Assessment undertaken.

**E) Railton point 11: The effectiveness of the proposed Travel Plan and associated measures have been exaggerated and are unlikely to lead to any measurable change in travel behaviour of the residents in the proposed development.**

9.02 DHA Transport considers that the approaches set out in the Transport Statement to bring about travel behaviour change are realistic given the accessible nature of the site, as described above. Nevertheless, the trip generation figures used in the Transport Statement, and considered by KCC H&T, did not take account of any mode shift as a result of the Travel Plan.

**Conclusion**

10.01 The above sets out the joint position of DHA Transport and Planning in response to the Railton note. The Transport Statement supporting the application is robust. The impacts on the highway network, and off-site highway works and low levels of additional traffic, have been considered by KCC H&T and SBC officers, and all are considered to be acceptable. This is reflected in the report to the SBC Planning Committee in March 2023.