



**Swale Borough Council**

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**Highways and Transportation**

Ashford Highway Depot  
4 Javelin Way  
Ashford  
TN24 8AD

**Tel:** 03000 418181

**Date:** 12 May 2022

**Our Ref:**

**Application - SW/21/505461/PSINF**

**Location - HMP Standford Hill, Church Road, Eastchurch, ME12 4AA**

**Proposal - The construction of two houseblocks to provide criminal justice accommodation for 120 prisoners, along with a proposed record store, library, office and extension to the existing visitor car park (40 spaces).**

Dear Corinna

Thank you for your consultation of 5<sup>th</sup> May 2022, following the submission of additional information to address my previous comments.

**Staff Numbers and Forecast Vehicular Trips**

The Ministry of Justice has now confirmed that the development proposals would require the increase in operational staff by 10, and non-operational staff by 3. The transport statement details that the operational staff work 3 shift patterns, which therefore derives the following for operational staff:

Early shift - 06:00 to 14:30 (40% = 4 staff)

Late shift - 12:30 to 21:30 (40% = 4 staff)

Night shift - 19:00 to 08:00 (20% = 2 staff)

The 3 non-operational staff work 2 shift patterns (Main shift 1 – 07:30 to 17:30 and Main shift 2 – 08:30 to 16:00)

**Highway Impact**

As previously acknowledged, the operational staff shift patterns mean that the vehicular movements associated with travel to and from work will occur outside of the network peaks. The additional 4 trips at the start and end of each of these shifts are therefore considered to have a negligible impact on the highway network. Similarly, the 3 additional non-operational staff members spread over their two shift patterns more aligned with the normal working day would also be considered to have a negligible impact.

In terms of the current application, the impact is acceptable, but it will incumbent on the current larger Elmley prison expansion application to assess the cumulative impact. I can therefore confirm that the cumulative impact study is not required for this application for Standford Hill.

## **Parking**

As previously accepted, the amount of additional parking proposed is appropriate for the scale of development. The applicant has now confirmed that proposed Electric Vehicle parking spaces will be increased by 4 in total, as requested, so I am satisfied that this issue has been resolved.

## **Travel Plan**

The Travel Plan has been revised to include working with the other prisons in the cluster to promote reduced car travel. I would like to see a firmer commitment to clearer targets and a monitoring strategy, together with actions to be taken if the targets are not met. Staff surveys should be completed on mode of travel and general location of origin so this can be used to assess the possibility of the mini bus service. I am content that the approval of a Travel Plan to include these requirements can be secured by condition.

## **Other Matters**

I note that the committee report anticipates comment on the Parish Council's request for traffic calming measures on Church Road. However, the scale of the current development, and negligible traffic impact from 13 additional staff would not warrant any mitigation. In any case, it is not considered that there is any evidence from the latest crash records to indicate that there is an existing problem that requires attention. Consequently, no off-site highway works will be sought from this development proposal.

I confirm that provided the following requirements are secured by condition or planning obligation, then I would raise no further objection on behalf of the local highway authority.:

- 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 4 Electric Vehicle chargers to Mode 3 standard (providing up to 7kw). Approved models are shown on the Office for Low Emission Vehicles Homecharge Scheme approved chargepoint model list:  
<https://www.gov.uk/government/publications/electric-vehicle-homecharge-scheme-approved-chargepoint-model-list>
  
- Provision and permanent retention of the vehicle parking spaces as shown on the submitted plans prior to the use of the site commencing.
  
- The development shall not be brought into use until a Travel Plan, to reduce dependency on the private car, has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall include objectives and modal-split targets, a programme of implementation and provision for monitoring, review and improvement. Thereafter, 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.

**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.