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## Land off Highfield Road, Sheppey Post Submission Response

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205427

### Introduction

1.1 This technical note has been prepared in response to comments made by Project Centre (PCL), within a Technical Note (dated 14 April 2022) on behalf of Swale Borough Council (SBC) in respect of highway matters relating to development of 16 dwellings on land off Highfield Road, Sheppey. A copy of the PCL technical Note is provided at **Appendix A**. A summary of the comments made by PCL are as follows:

- For the most part, the development proposal is considered appropriate in principle, however, further information is required before the proposal can be fully supported at the outline stage, which include:
  - Determine the extent of parking restrictions required on Highfield Road, so that visibility is not obstructed at the site access,
    - This should include an assessment on the existing capacity and whether removed on street parking can be relocated within a reasonable walking distance.
  - Determine average speeds on Highfield Road, so a reliable visibility assessment can be determined,
    - Given the proximity of the site access to the downward slope of the hill on Highfield Road, vehicle speeds could potentially be higher and suitable traffic calming measures required on Highfield Road.
  - Visibility splay calculations should be undertaken in accordance with Manual for Streets 2 (MfS2) which takes into consideration longitudinal gradients when determining safe Stopping Sight Distances (SSD)
  - Confirm what traffic calming measures will be installed within the site to maintain a traffic speed of 10 mph, as per the forward visibility assessment shown within the site,
  - Demonstrate the suitability of the development in relation to national and local policy, as highlighted throughout this TN. This should also include an assessment against:
    - Local Transport Plan for Kent (LTP4),
    - Kent County Council Active Travel Strategy,
    - Swale Transport Strategy.

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- Journey purpose and trip generation and distribution assessments considering Temprow data, which takes into consideration consider localised travel habits should be considered as part of the outline application and provided by the applicant.

## Context

### The Application

1.2 The outline application (20/505921/OUT) was originally submitted on 11 December 2020 for development of 19 dwellings. This was supported by a detailed Transport Statement and supporting drawings. A revised scheme of 16 dwellings was submitted on 27 July 2021 which was supported by a TS Addendum and updated drawings.

1.3 The description of the development is set out below and as detailed on the SBC planning portal.

*Outline application for the development of up to 16 dwellings and all necessary supporting infrastructure including internal access roads, footpaths and parking, open space and landscaping, drainage, utilities and service infrastructure works. All detailed matters are reserved for subsequent approval except for access to Highfield Road.*

1.4 For clarity in transport terms it is only the access which forms a detailed component of the application. The layout of the scheme and the internal road is a matter to be determined at the reserved matters planning application.

### KCC Highways Response

1.5 KCC Highways provided a response on 21 January 2021 in respect of the original submission for 19 dwellings and again on 5 January 2022 in respect of the revised scheme of 16 dwellings. A copy of the highway responses are provided at **Appendix B**.

1.6 A summary of the KCC response provided on 22 January 2021 is set out below. KCC highways appreciate that the detailed layout, including parking provision, will need to be assessed through a subsequent reserved matters application, as access is the only matter being sought at this time for approval.

- I am satisfied that the level of vehicular activity associated with the proposed development of 19 dwellings, would not be considered to have a significant impact on the highway network.
- The proposed access road to the site is wide enough for two vehicles to safely pass one another and the access design complies with the requirements set out within Kent Design Guide. It is also noted that the proposed access is similar in scale to other nearby junctions and is what we would expect for a housing development of this size.
- I am pleased to note that a pedestrian footway has been provided, which will link the site with the existing footway on Highfield Road.
- Tracking has been provided for a large refuse vehicle and I am satisfied that the site would be able to accommodate appropriate access for service and emergency vehicles.
- Visibility splays of 2.4m x 43m in both directions have been shown on the proposed site access drawing, which are acceptable.

1.7 The response dated 5 January 2022 simply stated:

*I have reviewed the additional information and can confirm that I have no further comments to add to my previous response dated 21st January 2021. I will therefore adhere to the response provided at that time but will take the opportunity to update the informative requested to reflect the Highway Authority's current version*

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## Access Arrangement

### PCL Comments

- 1.8 PCL states that for the most part the access arrangement is supported.
- 1.9 PCL states that the visibility splays proposed exceed the requirements for Manual for Streets 1.
- 1.10 PCL states that parking restrictions will be required on Highfield Road to ensure visibility is not blocked at the proposed access location. PCL state that *'A site visit carried out by PCL in March 2022, confirmed that vehicles often park on the southern side of Highfield Road, close to the proposed site access location.'*
- 1.11 PCL request that speed survey is required to determine the 85<sup>th</sup> %ile speed to inform the visibility splay calculations. These calculations need to be in line with Manual for Streets 2 SSD which takes into account longitudinal gradients.
- 1.12 PCL note that the internal road has a visibility splay of 12m which his line with a 10mph road. PCL request that details of speed calming measures are identified.

### Vectos Response

#### Access Visibility – Parking Restrictions

- 1.13 It is welcomed that PCL consider that for the most part that the access arrangement is supported and that the visibility splays proposed exceed the requirements of Manual for Streets 1. For context KCC Highways incited within their consultation response that the access design complies with the requirements set out within Kent Design Guide. KCC Highways state that it is also noted that the proposed access is similar in scale to other nearby junctions and is what we would expect for a housing development of this size.
- 1.14 We do not agree with PCL that parking restrictions are required to restrict vehicles from parking within the visibility splay. PCL state that a site visit was undertaken in March 2022 and from this single visit they concluded that cars often park on the southern side of Highfield Road, close to the proposed access location. It's unclear how a site visit on one day can lead to the conclusion of this being an often occurrence. However, whilst it could be the case that on street parking does occur along Highfield Road, and this may impact on visibility splays at the proposed junction, we do not consider this to be an issue as explored further below. It is also notable that this issue has **not** been raised by the Highway Authority (KCC) as a concern.
- 1.15 The residential area surrounding the site has numerous T-junction arrangements and driveway accesses where there are no parking restrictions to restrict parking within visibility splays. **Figure 1** shows the junction where there are parking restrictions and where there are not.

Figure 1: Parking Restrictions at Junctions



1.16 As shown in Figure 1, there are no parking restrictions at junctions within the residential area to the south of Queenborough Road to which the site is located, with the exception of the access to Halfway Houses Primary School where restrictions (school keep clear road markings) are in place for only 10 metres either side of the access, between 0830 and 0920 and 1430 and 1700.

1.17 Figure 2 shows collision data within the most recent 5 year period, which broadly covers the extent shown in Figure 1.

Figure 2: Collision Data



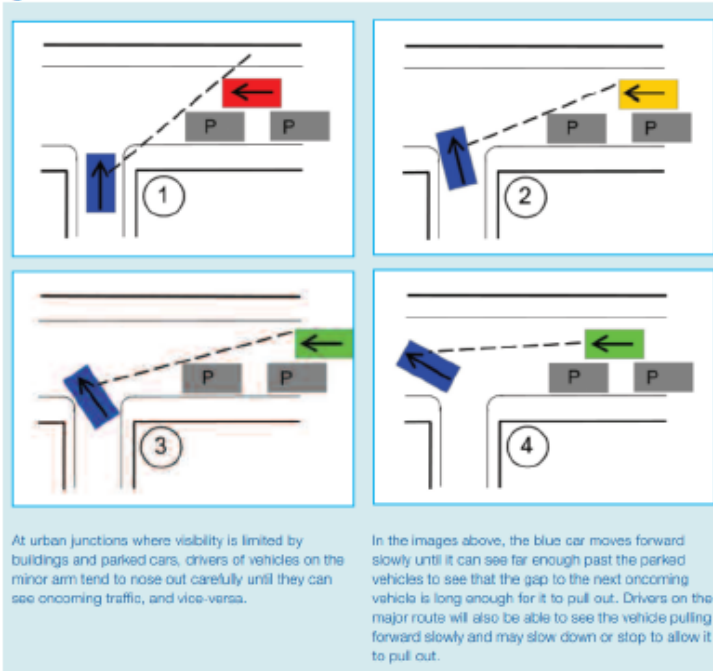
1.18 There are no recorded collision along the residential streets south of Queenborough Road, and equally there are no parking restrictions at junctions within this area (with the exception of the primary school). This demonstrates that on-street parking within visibility splays does not lead to a road safety concern. Moreover, the adjacent residential area is characterised by driveway access and on street car parking which can obstruct visibility splays from driveways. Despite this, there has been no recorded collisions within the residential area south of Queenborough Road for the most recent 5 years.

1.19 Further to this, Manual for Streets 2 is clear in that:

*Parking in visibility splays in built-up areas is quite common, yet it does not appear to create significant problems in practice.*

1.20 **Figure 3** is taken from MfS 2 shows how this access would work practice.

Figure 3: MFS 2 Extract



1.21 Given that traffic volumes are low and speeds are low (see table 1), then we do not consider this to be an issue. Parking is commonplace within the adjacent residential areas close to junctions and driveway accesses, yet the network is proven to operate safely.

1.22 Manual for Streets 2 also concludes that:

*It has often been assumed that a failure to provide visibility at priority junctions in accordance with the values recommended in MFS 1 or DMRB (as appropriate) will result in an increase risk of injury collisions. Research carried out by TMS consultancy for MFS2 has found no evidence of this. Research into cycle safety at T-junction found higher cycle collision rates are associated with greater visibility.*

Visibility Splay Calculation and Traffic Survey's

1.23 An ATC survey on either side of the access junction was undertaken for 7 days between Thursday 28 April 2022 and Wednesday 4 May 2022, which collected traffic data on volume, composition and speed. A summary of the ATC survey is set out in Table 1, and the full survey results are provided at **Appendix C**.

Table 1: ATC Survey Results

	EB	WB	TOT	Avg Speed* W/B	Avg Speed* E/B	85 <sup>th</sup> %ile Speed* W/B	85 <sup>th</sup> %ile Speed* E/B
<b>ATC West of Access</b>							
AM Peak	12	21	33				
PM Peak	37	10	47				
Daily	202	177	379	20.6 mph	22.4 mph	26.4 mph	28.3 mph
<b>ATC East of Access</b>							
AM Peak	11	21	32				
PM Peak	35	8	43				
Daily	192	165	358	20.6 mph	22.3 mph	26.1 mph	27.8 mph

\*Highest speed selected from 5 day and 7 day average

- 1.24 Traffic flows are low, ranging from around 33 vehicle during the AM peak hour and 47 during the PM peak hour. Speeds are in line with a 20mph speed limit the average speed eastbound is around 22.4mph and the average speed westbound is around 20.6mph.
- 1.25 To calculate visibility splays in line with MFS2, the following speeds and gradients have been used:
- Visibility to left of access (Eastbound 85<sup>th</sup> %ile speed from ATC West of Access): 28.3mph
    - o Gradient of -5.4% applied (based on LIDAR Data as per **Appendix D**)
  - Visibility to right of access (Westbound 85<sup>th</sup> %ile speed from ATC east of Access): 26.1mph
    - o No gradient factor applied as the approach is uphill and as such the application of such gradient would reduce the visibility requirement.
- 1.26 Based on the above and the equation set out in MFS 2, a visibility splay of 2.4m by 42.1m to the left should be provided and 2.4m by 35.3m to the right (visibility splay requirement to the right could be reduced as no gradient applied). The access design provided at drawings **205427-A01 Rev D** as submitted) shows a visibility splay of 2.4m by 43m to the left and right which is in excess of the minimum requirement.
- 1.27 This fully addresses the concern raised by PCL on behalf of SBC and confirms the access design as submitted is in line with the appropriate design requirements, road speed and gradients.

#### Internal Road Assessment

- 1.28 For clarity the internal road network is not to be considered in detail at this stage. KCC highways state: *'It is appreciated that the detailed layout, including parking provision, will need to be assessed through a subsequent reserved matters application, as access is the only matter being sought at this time for approval.'*
- 1.29 It is unclear as to why PCL are requesting further information in terms of the site layout itself when it is not a detailed component of the current application. PCL acknowledge this within their response where they state in the policy section: *'all detailed matters are reserved for subsequent approval except for access to Highfield Road.'*



- 1.30 Notwithstanding the above MfS 2 is clear in that kerblines assist with reducing the speed of vehicles. The kerb radius shown on the internal road network is 11m and 8m, this equates to a design speed of 13/15mph, this is well within the design speed of 20mph as per drawing **205427\_PD01 Rev B** as submitted with the revised scheme. The horizontal alignment in the road will act as natural speed calming measures which will bring the speed of vehicles down so that the visibility splays shown are in line with the minimum requirement.
- 1.31 Notwithstanding this, PCL has not considered or provided any commentary on the illustrative drawings that supported the revised scheme for 16 dwellings which shows visibility splays of 25m which is in line with a 20mph road. However, again this is not a detailed component of the current application and is reserved for future consideration.

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## Policy Review

- 1.32 PCL has set out what they consider to be relevant policy and then consider whether the scheme is compliant with that policy. For clarity KCC as highway authority has provided no policy objection to this development.

### NPPF

- 1.33 Paragraph 111 of the NPPF states that “development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”. PCL within their response do not confirm there to be a severe impact. PCL do state that:

*At this stage we have not seen any potential network issues. Vehicle trip generation based on 16 dwellings is low.*

- 1.34 PCL state that the suitability of the access is not supported until further evidence has been provided.
- 1.35 PCL state that all detailed matters are reserved for subsequent approval except for access to Highfield Road.
- 1.36 The primary issue raised PCL is whether the access is suitably designed.

### NPPF – Vectors Response

- 1.37 The primary issue raised by PCL is in relation to the access. This note has addressed the concerns raised by PCL in respect of the access. This note confirms that the access design as submitted is in line with the appropriate design requirements, road speed and gradients.
- 1.38 The proposals accord with the requirements of the NPPF.

### National Planning Practice Guidance

- 1.39 PCL States:

NPPG notes how Transport Statements can positively contribute to different transport and highway improvements. The TS should therefore outline how the development contributes to:

- Encouraging sustainable travel,
- Lessening traffic generation and its detrimental impacts,
- Reducing carbon emissions and climate impacts,
- Creating accessible, connected, inclusive communities,
- Improving health outcomes and quality of life,
- Improving road safety; and;

- Reducing the need for new development to increase existing road capacity or provide new roads.

National Planning Policy Guidance – Vectos Response

- 1.40 The proposed development is located within a sustainable location and therefore provides the opportunity for trips to be made by sustainable travel modes and lessening traffic generation when compared to locating development in unsustainable locations. In turn this reduced the carbon emissions and climate impacts, improving health outcomes and quality of life. There are no inherent road safety concerns within the vicinity of the site to address. PCL has confirmed “*At this stage we have not seen any potential network issues. Vehicle trip generation based on 16 dwellings is low*” which means there is no need to increase exiting road capacity.

Local Policy – Swale Local Plan

- 1.41 PCL confirm that the development s complaint with most key aims of the Swale Local Plan. This is welcomed.
- 1.42 PCL state that: “One key aim which is not adhered to includes: “Achieving safe and suitable access to sites for all people and goods”.

Local Policy – Swale Local Plan Vectos Response

- 1.43 The primary issue raised by PCL on behalf of SBC is in relation to the access. This note has addressed the concerns raised by PCL in respect of the access. This note confirms that the access design as submitted is in line with the appropriate design requirements, road speed and gradients.

Other Policy

- 1.44 PCL has requested that the development should be assessed against the following policy documents:
- Local Transport Plan for Kent (LTP4)
  - Kent County Council Active Travel Strategy
  - Swale Transport Strategy
- 1.45 PCL has not referred to particular points or policy in relation to these documents. PCL has not identified any policies within these documents where the development is not complaint. For completeness a review of these documents is set out below.

Local Transport Plan for Kent (LTP4)

- 1.46 The purpose of the local transport plan for Kent is to identify the local transport priorities and the interest of the National Government and the Southeast Local Enterprise Partnership (SELEP) to support the growth of the area. Ultimately the LTP intends to deliver, infrastructure, housing, and economic growth.

To achieve this, the LTP defines 5 transport outcomes:

- **Outcome 1:** Economic growth and minimised congestion
- **Outcome 2:** Affordable and accessible door-to-door journeys

- Outcome 3: Safer travel
- Outcome 4: Enhanced environment
- Outcome 5: Better health and wellbeing

- 1.47 **Outcome 1:** Economic growth and minimised congestion and details its focus as:
- *“Policy: Deliver resilient transport infrastructure and schemes that reduce congestion and improve journey time reliability to enable economic growth and appropriate development, meeting demand from a growing population.”*
- 1.48 The proposed development is located in a sustainable location which enables opportunity for travel by sustainable modes. PCL confirm that “we have not seen any potential network issues. Vehicle trip generation based on 16 dwellings is low”.
- 1.49 **Outcome 2:** Affordable and accessible door-to-door journeys:
- *“Policy: Promote affordable, accessible and connected transport to enable access for all to jobs, education, health and other services.”*
- 1.50 For **Outcome 2** what has already been covered in terms of accessibility to relevant facilities within walking and cycling distance as per the TA. In this aspect, the site should be considered accessible and connected, due to its proximity to nearby, education, health, jobs and other services.
- 1.51 **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.”*
- 1.52 The site’s location is within a residential area where there has not been a recorded collision (all road users) within the latest 5 year period where data is available. This data is presented within the note.
- 1.53 **Outcome 4:** Enhanced environment
- *“Deliver schemes to reduce the environmental footprint of transport and enhance the historic and natural environment.”*
- 1.54 The proposed development is located in a sustainable location. PCL confirm that “we have not seen any potential network issues. Vehicle trip generation based on 16 dwellings is low”. This reduces the environmental footprint of transport.
- 1.55 **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.”*

1.56 Even though the site's size doesn't create the significant transport impacts that would merit a travel plan, the sites accessibility to nearby facilities by active transport help to deliver the expected good health and wellbeing for the area. The location of the site makes it an appropriate place to use active transport to reasonably reach local amenities.

1.57 In summary the development on the land south of Highfield Road is entirely within keeping of the expectation laid out by the outcomes of Kents latest LTP.

*Kent County Council Active Travel Strategy*

1.58 The Kent County Council Active travel strategy aims to make active travel an attractive and realistic choice for short journeys in Kent. The primary outcomes of the strategy is:

- Improved health through an increase in physical activity
- Reduced congestion on the highway network by providing better travel choices
- Safer active travel

1.59 The strategy also states that in regard to integrating active travel, KCC would

*"Work with developers to ensure active travel routes are a priority, both within developments and linking sites to other services, community facilities and transport hubs"*

1.60 The development delivers on this. The proposed development is located within a sustainable location and therefore provides the opportunity for trips to be made by sustainable travel modes and lessening traffic generation when compared to locating development in unsustainable locations. In turn this reduced the carbon emissions and climate impacts, improving health outcomes and quality of life. There are no inherent road safety concerns within the vicinity of the site (for all road users) to address. PCL has confirmed "At this stage we have not seen any potential network issues. Vehicle trip generation based on 16 dwellings is low" reaffirming the fact there the impact development on congestion would not be noticeable.

*Swale Transport Strategy*

1.61 The Swale Transport Strategy currently in draft form. It is unclear if PCL is referring to this draft document.

1.62 This Strategy provides a framework to guide the development of transport-based improvements and interventions within the borough for the period up to 2038 and is intended to replace Swale Transportation Strategy 2014-2031. Like the KCC LTP4 this document presents its general standards across 6 objectives:

- **Objective 1:** To promote active and sustainable travel enabling residents to take up these modes.
- **Objective 2:** To reduce and mitigate the impact of poor air quality related to transport whilst striving for net zero.
- **Objective 3:** To improve the journey time reliability and resilience across the transport network.
- **Objective 4:** To support the economic growth and development projected in the Local Plan Review.
- **Objective 5:** To consider the needs of all users across the transport network.

- **Objective 6:** To substantially reduce all road casualties and progress towards zero killed and seriously injured (KSI) casualties.

- 1.63 In relation to **Objective 1** the site does not create significant transport implications that would require a travel plan that would directly promote active and sustainable travel. The site is located in a sustainable location which provides opportunity for trips to be made by sustainable modes of travel.
- 1.64 In the case of **Objective 2 and 3**, PCL has confirmed that “we have not seen any potential network issues. Vehicle trip generation based on 16 dwellings is low”
- 1.65 For **Objective 4** the proposal seeks to deliver 16 dwellings within a sustainable location.
- 1.66 In terms of **Objective 5** the transport statement sets out a multi-modal trip generation for the site and considers the accessibility of the site by sustainable modes. It provides information on footpaths, cycle routes, bus times, rail times and identifies local services facilities. The access design forms a detailed component of the application which includes a footpath connecting to Highfield Road.
- 1.67 **Objective 6** the sites location is within a residential area where there has not been a recorded collision within the latest 5 year period where data is available. This data is presented within the note.
- 1.68 In summary the site delivers transport entirely within the goals of Swale Transport Strategy.

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## Trip Generation Forecast

### PCL Comments

- 1.69 PCL states that at this stage we have not seen any potential network issues. Vehicle trip generation based on 16 dwellings is low.
- 1.70 PCL agree with the TRICS site section criteria for development.
- 1.71 PCL request that TEMPRO data is used to calculate journey purpose percentages.

### Vectos Response – Traffic Generation

- 1.72 It is welcome that PCL have seen no network issues and that the vehicle trip generation based on 16 dwellings is low.
- 1.73 It is welcomed that PCL agree with the TRICS site selection criteria.
- 1.74 It is unclear as to why PCL has requested further analysis when they have already concluded that the vehicle trip generation forecast is low.
- 1.75 In this respect, it is relevant to note that a planning application (19/503810/OUT) for development of 17 dwellings on the nearby Bartlett's Close was recently allowed at appeal. The vehicle trip generation associated with this scheme did not utilise information from TEMPRO. The traffic forecast was 9 vehicle trips during the AM hour and 9 vehicle trips during the PM peak hour. The traffic forecast for the proposed development of 16 dwellings is 8 vehicle trips during the AM peak hour and 8 vehicle trips during the PM peak hour. This is consistent with the appeal site.
- 1.76 Also relevant, is planning application 19/501921/FULL, approved by SBC, for a residential development of 153 dwellings on Belgrave Road. Applying the vehicle trip rates from planning application 19/501921/FULL to the proposed 16 dwellings then the trip forecast would be 8 vehicle trips during the AM peak hour and 8 vehicle trips during the PM peak hour. This is the same as what has been forecast for the proposed development.
- 1.77 There is no further requirement to assess the trip generation forecast. It is consistent with what SBC has already consented on adjacent sites (application 19/501921/FULL) and has also been tested at appeal (19/503810/OUT).

## Summary and Conclusions

- 1.78 This technical note has been prepared in response to comments made by Project Centre (PCL), within a Technical Note (dated 14 April 2022) on behalf of Swale Borough Council (SBC) in respect of highway matters relating to development of 16 dwellings on land off Highfield Road, Sheppey.
- 1.79 KCC as highway authority has not objected to the development.
- 1.80 This note comprehensively responds to points raised by PCL and concludes that the development is acceptable in policy and design terms.
- 1.81 There is no policy or technical reason to object to this application from a transport point of view.



Appendix A



## Technical Note

### Highways Review

Project	Land of Highfield Road, Sheppey	Job No	1000007836
Subject	Highways Review – Technical Note	Issue	02
Prepared by	Rob Franklin	Date	12/04/22
Approved by	Ben Meekings	Date	12/04/22

### Introduction

- 1.1 Swale Borough Council (SBC) has commissioned Project Centre (PCL) to provide a Technical Note (TN) reviewing highway matters relating to:
  - Land At Highfield Road, Minster-on-sea - Outline application for the development of up to 16 dwellings and all necessary supporting infrastructure including internal access roads, footpaths and parking, open space and landscaping, drainage, utilities and service infrastructure works.
- 1.2 It is noted that all detailed matters of appearance, landscaping, layout and scale are reserved for subsequent approval except for access to Highfield Road which is to be determined at outline planning stage.
- 1.3 We note that an outline Transport Statement (TS) was submitted in December 2020 detailing a proposal for up to 19 dwellings. However, since then a revised development yield of up to 16 dwellings is proposed.
- 1.4 We have therefore reviewed all submitted information with the revised dwelling totals in mind.
- 1.5 Further information is required before the proposal can be fully supported, which is summarised as part of this TN's conclusion.



### **Access Arrangements**

- 2.2 For the most part, the access arrangement is supported, noting:
- 5.5m wide carriageway,
  - 6m junction kerb radii, and
  - 2m wide pedestrian footpaths.
- 2.3 It is noted that we have not reviewed any drawing files at the time of this review and cannot confirm these geometries other than those provided as part of the outputs.
- 2.4 Desktop visibility plans provided by the applicant show that visibility splays of 43m can be achieved in both directions, compliant with requirements for 30mph roads. Highfield Road is subject to a 20mph speed limit and therefore visibility exceeds the requirements in Manual for Streets 1 (MfS1).
- 2.5 Parking restrictions will be required on Highfield Road to ensure visibility is not blocked at the proposed site access location. A site visit carried out by PCL in March 2022, confirmed that vehicles often park on the southern side of Highfield Road, close to the proposed site access location, as shown in Figure 1.
- 2.6 The site visit confirmed that visibility to the hill crest on Highfield Road from the site access is around 60m. An SSD of 43m is therefore noted to be achievable before the hill crest.

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Figure 1: Parking on Highfield Road Near Proposed Access



- 2.7 Speed surveys should be undertaken to determine 85<sup>th</sup> percentile speeds on Highfield Road, where the site access is proposed. Given the proximity of the site access to the downward slope of the hill on Highfield Road, vehicle speeds could potentially be higher and suitable traffic calming measures required on this street.
- 2.8 In addition, visibility splay calculations should be undertaken in accordance with Manual for Streets 2 (MfS2) which takes into consideration longitudinal gradients when determining safe Stopping Sight Distances (SSD).
- 2.9 The TS notes that the internal road has a visibility splay of 12m which is in line with the requirements of MfS1 for a 10mph road. Although this is acknowledged, the TS does not outline what traffic calming measures are proposed to achieve these vehicle speeds.
- 2.10 As the internal road ties directly into the site access, it is considered the above measures should be outlined to ensure vehicle speeds remain low to and from the proposed junction with Highfield Road.



- 2.11 Therefore, the above matters should be addressed before the proposed access arrangement is considered acceptable.

#### **Parking Provisions**

- 2.12 The shown parking provisions adhere to Swale Borough Council Parking Standards.
- 2.13 It is acknowledged that proposed parking provisions are detailed matters and are reserved for subsequent approval.

#### **Refuse Collection and Servicing**

- 2.14 We have reviewed the vehicle tracking plans, which demonstrate refuse vehicles entering and exiting the site in a forward direction and consider these acceptable.
- 2.15 Given the proposed geometries of this site access, it is considered the access is sufficient in terms of geometries to accommodate servicing vehicles also.

#### **Policy Context**

##### **National Policy**

- 2.16 We have reviewed the TS in relation to national planning policies, noting:
- National Planning Policy Framework (NPPF)
    - Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location (para. 110);
      - We note that the TS outlines infrequent bus services throughout the week, noting that only one bus service (334 Service) is every 30 minutes. It is considered that public transport could be unattractive for those residing at the site due to infrequent services.



- Safe and suitable access to the site can be achieved for all users (para. 110);
    - We note that the suitability of the access is not supported until further evidence has been provided, as requested in this Technical Note.
  - The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code (para. 128);
    - All detailed matters are reserved for subsequent approval except for access to Highfield Road.
  - Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree (para. 104).
    - At this stage we have not seen any potential network issues. Vehicle trip generation based on 16 dwellings is low.
- 2.17 As stated in NPPF (para 111); *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”.*
- 2.18 In relation to this, further evidence is required to deem the site access is suitable for purpose and therefore cannot support the proposal on highway grounds.
- National Planning Practice Guidance (NPPG)
    - The TS discusses the effectiveness of implementing Travel Plans, however, the applicant has noted that a Travel Plan is not required due to the nature of the proposal and therefore this information is irrelevant.



- o NPPG notes how Transport Statements can positively contribute to different transport and highway improvements. The TS should therefore outline how the development contributes to:
    - Encouraging sustainable travel,
    - Lessening traffic generation and its detrimental impacts,
    - Reducing carbon emissions and climate impacts,
    - Creating accessible, connected, inclusive communities,
    - Improving health outcomes and quality of life,
    - Improving road safety; and
    - Reducing the need for new development to increase existing road capacity or provide new roads.
- 2.19 We have not seen sufficient evidence that the development adheres to critical national policies, notably those relating to the suitability of the site access, which should be demonstrated.

#### Local Policy

- 2.20 We have reviewed the TS in relation to Local planning policies, noting:
- Swale Borough Local Plan (Swale LP)
    - o We consider the development compliant with most key aims outlined in the Swale LP.
    - o One key aim which is not adhered to includes: *"Achieving safe and suitable access to sites for all people and goods"*.
      - We note that the suitability of the access is not supported until further evidence has been provided, as requested in this Technical Note.
  - SBC Parking Policy
    - o As mentioned, it is acknowledged that proposed parking provisions are detailed matters and are reserved for subsequent approval.
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- o We note that further investigation should be made relating to local car ownership levels, in line with SBC Parking Policies, to ensure there is not an over provision of parking on site, which could encourage inappropriate levels of car ownership.
- 2.21 We note that the development should also be assessed by the applicant against the following Local policy documents:
- Local Transport Plan for Kent (LTP4),
  - Kent County Council Active Travel Strategy,
  - Swale Transport Strategy.
- 2.22 We do not consider the development to adhere to critical Local Policies, notably those relating to the suitability of the site access, which should be addressed.
- Trip Generation and Distribution**
- 2.23 We have reviewed the submitted trip generation and distribution methodology, notably Appendix D.
- 2.24 We consider the TRICS site selection suitable for the development.
- 2.25 In relation to trips by journey purpose, we consider the use of Tempro is a more robust method of calculating journey purpose percentages, as it provided more detailed information local to the site, whereas National Travel Survey data is based on national averages, which are not site or area specific.
- 2.26 We therefore advise that the journey purpose assessment be revised using Tempro data to consider localised travel habits, with the trip generation updated accordingly.





### Conclusions

PROJECT  
CENTRE

2.27 To conclude:

- PCL have reviewed highways matters relating to and outline planning application for a residential development at Land at Highfield Road, Minster-on-sea,
- For the most part, the development proposal is considered appropriate in principle, however, further information is required before the proposal can be fully supported at the outline stage, which include:
  - Determine the extent of parking restrictions required on Highfield Road, so that visibility is not obstructed at the site access,
    - This should include an assessment on the existing capacity and whether removed on street parking can be relocated within a reasonable walking distance.
  - Determine average speeds on Highfield Road, so a reliable visibility assessment can be determined,
    - Given the proximity of the site access to the downward slope of the hill on Highfield Road, vehicle speeds could potentially be higher and suitable traffic calming measures required on Highfield Road.
  - Visibility splay calculations should be undertaken in accordance with Manual for Streets 2 (MfS2) which takes into consideration longitudinal gradients when determining safe Stopping Sight Distances (SSD)
  - Confirm what traffic calming measures will be installed within the site to maintain a traffic speed of 10 mph, as per the forward visibility assessment shown within the site,



- o Demonstrate the suitability of the development in relation to national and local policy, as highlighted throughout this TN. This should also include an assessment against:
  - Local Transport Plan for Kent (LTP4),
  - Kent County Council Active Travel Strategy,
  - Swale Transport Strategy.

Journey purpose and trip generation and distribution assessments considering Temprow data, which takes into consideration consider localised travel habits should be considered as part of the outline application and provided by the applicant.

Appendix B



**Swale Borough Council**  
Swale House  
East Street  
Sittingbourne  
Kent  
ME10 3HT

**Highways and Transportation**  
Ashford Highway Depot  
4 Javelin Way  
Ashford  
TN24 8AD  
Tel: 03000 418181  
Date: 21 January 2021

**Application - SW/20/505921/OUT**  
**Location - Land At Highfield Road, Minster-on-sea, Kent**  
**Proposal - Outline application for the development of up to 19 dwellings with associated supporting infrastructure including internal access roads, footpaths and parking, open space and landscaping, drainage, utilities and service infrastructure works (All Matters Reserved for future consideration except for access to Highfield Road).**

Thank you for your consultation in relation to the above outline planning application. I note that all matters, excluding access, are reserved with this application. Consequently, I have the following comments to make in relation to the proposed access for this application;

- I am satisfied that the level of vehicular activity associated with the proposed development of 19 dwellings, would not be considered to have a significant impact on the highway network.
- The proposed access road to the site is wide enough for two vehicles to safely pass one another and the access design complies with the requirements set out within Kent Design Guide. It is also noted that the proposed access is similar in scale to other nearby junctions and is what we would expect for a housing development of this size.
- I am pleased to note that a pedestrian footway has been provided, which will link the site with the existing footway on Highfield Road.
- Tracking has been provided for a large refuse vehicle and I am satisfied that the site would be able to accommodate appropriate access for service and emergency vehicles.
- Visibility splays of 2.4m x 43m in both directions have been shown on the proposed site access drawing, which are acceptable.

It is appreciated that the detailed layout, including parking provision, will need to be assessed through a subsequent reserved matters application, as access is the only matter being sought at this time for approval. When further plans are submitted, they should also include adequate parking provision for number 37 Highfield Road. This will ensure vehicles do not need to reverse off the driveway, which will be reduced in order to form the access road for this development.

## APPENDIX 3

With this in mind, I can 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
  
- Completion and maintenance of the access shown on the submitted plans (ref 205427-A01 Rev D) prior to the use of the site commencing.
  
- Use of a bound surface for the first 5 metres of each access from the edge of the highway.
  
- Provision of measures to prevent the discharge of surface water onto the highway.
  
- Provision and maintenance of the visibility splays shown on the submitted plans (ref 205427-A01 Rev D)) with no obstructions over 0.9 metres above carriageway level within the splays, prior to the use of the site commencing.
  
- Provision and permanent retention of the vehicle parking spaces and/or garages in accordance with details to be submitted to and approved in writing by the Local Planning Authority prior to the use of the site commencing.
  
- Provision and permanent retention of electric vehicle charging points in accordance with details to be submitted to and approved in writing by the Local Planning Authority prior to the use of the site commencing.
  
- Provision and permanent retention of the cycle parking facilities in accordance with details to be submitted to and approved in writing by the Local Planning Authority prior to the use of the site commencing.

INFORMATIVE: It is the responsibility of the applicant to ensure , before the development hereby approved is commenced, that all necessary highway approvals and consents where required are obtained and that the limits of highway boundary are clearly established in order to avoid any enforcement action being taken by the Highway Authority.

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 road. This is called 'highway land'. Some of this land is owned by The Kent County Council (KCC) whilst some are owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Information about how to clarify the highway boundary can be found at

<https://www.kent.gov.uk/roads-and-travel/what-we-look-after/highway-land/highway-boundary-enquiries>

Planning permission does not convey any approval for construction of the required vehicular crossing, or any other works within the highway for which a statutory licence must be obtained. Applicants should contact Kent County Council - Highways and Transportation (web: [www.kent.gov.uk/roads\\_and\\_transport.aspx](http://www.kent.gov.uk/roads_and_transport.aspx) or telephone: 03000 418181) in order to obtain the necessary Application Pack.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under such 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.

Yours faithfully

**Alison Coppin**  
Development Planner



**Swale Borough Council**  
Swale House  
East Street  
Sittingbourne  
Kent  
ME10 3HT

**Highways and Transportation**  
Ashford Highway Depot  
4 Javelin Way  
Ashford  
TN24 8AD  
Tel: 03000 418181  
Date: 5 January 2022  
Our Ref:

**Application - SW/20/505921/OUT**

**Location - Land At Highfield Road, Minster-on-sea, Kent**

**Proposal - Outline application for the development of up to 19 dwellings with associated supporting infrastructure including internal access roads, footpaths and parking, open space and landscaping, drainage, utilities and service infrastructure works (All Matters Reserved for future consideration except for access to Highfield Road).**

Thank you for your consultation in relation to the submission of additional information for the above planning application.

I have reviewed the additional information and can confirm that I have no further comments to add to my previous response dated 21<sup>st</sup> January 2021. I will therefore adhere to the response provided at that time but will take the opportunity to update the informative requested to reflect the Highway Authority's current version:

**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

**APPENDIX 3**

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.



Appendix C

Isle of Sheppey ATC, Highfield Road (Eastern Site)

Direction: Eastbound

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5mph	Bin 2 5-10	Bin 3 10-15	Bin 4 15-20	Bin 5 20-25	Bin 6 25-30	Bin 7 30-35	Bin 8 35-40	Bin 9 40-45	Bin 10 45-50	Bin 11 50-55	Bin 12 >=55
Thu 28 Apr 2022	173	27.1	22.0	4.9	0	1	14	40	57	47	4	0	0	0	0	0
Fri 29 Apr 2022	280	28.1	22.8	5.2	0	3	15	60	106	81	13	2	0	0	0	0
Sat 30 Apr 2022	148	27.9	22.6	5.2	0	2	8	31	61	38	7	1	0	0	0	0
Sun 1 May 2022	104	26.2	20.2	5.8	0	2	18	27	41	14	1	0	0	1	0	0
Mon 2 May 2022	93	27.5	21.8	5.5	0	1	12	16	39	20	5	0	0	0	0	0
Tue 3 May 2022	196	27.8	22.0	5.5	0	3	18	47	67	52	11	0	0	0	0	0
Wed 4 May 2022	218	28.4	22.8	5.4	0	2	12	50	79	61	13	0	0	1	0	0
5 Day Ave.	192	27.8	22.3	5.3	0	2	14	43	72	52	9	0	0	0	0	0
7 Day Ave.	173	27.6	22.0	5.3	0	2	14	39	66	45	8	0	0	0	0	0

360 TSL Ltd

Direction: Westbound

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5mph	Bin 2 5-10	Bin 3 10-15	Bin 4 15-20	Bin 5 20-25	Bin 6 25-30	Bin 7 30-35	Bin 8 35-40	Bin 9 40-45	Bin 10 45-50	Bin 11 50-55	Bin 12 >=55
Thu 28 Apr 2022	178	26.7	20.7	5.8	2	7	12	57	63	30	6	1	0	0	0	0
Fri 29 Apr 2022	213	27.0	21.3	5.5	2	5	15	53	93	36	8	1	0	0	0	0
Sat 30 Apr 2022	119	26.9	21.6	5.1	0	2	6	40	40	26	5	0	0	0	0	0
Sun 1 May 2022	92	25.7	20.2	5.3	0	2	15	23	36	15	1	0	0	0	0	0
Mon 2 May 2022	73	24.9	19.3	5.4	0	3	12	24	26	7	0	1	0	0	0	0
Tue 3 May 2022	183	26.2	20.8	5.3	0	7	14	53	76	27	6	0	0	0	0	0
Wed 4 May 2022	179	25.6	20.7	4.7	0	5	13	56	74	31	0	0	0	0	0	0
5 Day Ave.	165	26.1	20.5	5.3	1	5	13	49	66	26	4	1	0	0	0	0
7 Day Ave.	148	26.1	20.6	5.3	1	4	12	44	58	25	4	0	0	0	0	0

360 TSL Ltd

Direction: Total Flow

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5mph	Bin 2 5-10	Bin 3 10-15	Bin 4 15-20	Bin 5 20-25	Bin 6 25-30	Bin 7 30-35	Bin 8 35-40	Bin 9 40-45	Bin 10 45-50	Bin 11 50-55	Bin 12 >=55
Thu 28 Apr 2022	351	27.0	21.3	5.4	2	8	26	97	130	77	10	1	0	0	0	0
Fri 29 Apr 2022	493	27.7	22.1	5.3	2	8	30	113	199	117	21	3	0	0	0	0
Sat 30 Apr 2022	267	27.5	22.1	5.2	0	4	14	71	101	64	12	1	0	0	0	0
Sun 1 May 2022	196	25.9	20.2	5.5	0	4	33	50	77	29	2	0	0	1	0	0
Mon 2 May 2022	166	26.5	20.7	5.6	0	4	24	40	65	27	5	1	0	0	0	0
Tue 3 May 2022	381	27.1	21.4	5.4	0	10	32	100	143	79	17	0	0	0	0	0
Wed 4 May 2022	397	27.2	21.8	5.2	0	7	25	106	153	92	13	0	0	1	0	0
5 Day Ave.	358	27.1	21.5	5.4	1	7	27	91	138	78	13	1	0	0	0	0
7 Day Ave.	322	27.0	21.4	5.4	1	6	26	82	124	89	11	1	0	0	0	0

360 TSL Ltd



Isle of Sheppey ATC, Highfield Road (Western Site)

Direction: Eastbound

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5mph	Bin 2 5-10	Bin 3 10-15	Bin 4 15-20	Bin 5 20-25	Bin 6 25-30	Bin 7 30-35	Bin 8 35-40	Bin 9 40-45	Bin 10 45-50	Bin 11 50-55	Bin 12 >=55
Thu 28 Apr 2022	22	26.8	22.0	4.6	0	0	0	9	7	5	1	0	0	0	0	0
Fri 29 Apr 2022	16	27.8	23.8	3.9	0	0	0	2	9	4	1	0	0	0	0	0
Sat 30 Apr 2022	21	29.2	20.9	8.1	1	1	2	5	6	4	1	1	0	0	0	0
Sun 1 May 2022	17	24.6	17.2	7.2	0	2	6	4	2	2	1	0	0	0	0	0
Mon 2 May 2022	10	29.9	22.0	7.6	0	1	0	2	5	1	0	1	0	0	0	0
Tue 3 May 2022	15	28.1	20.8	7.0	0	1	1	5	5	2	0	1	0	0	0	0
Wed 4 May 2022	16	28.9	23.4	5.2	0	0	1	3	5	6	1	0	0	0	0	0
5 Day Ave.	16	28.3	22.4	5.7	0	0	0	4	6	4	1	0	0	0	0	0
7 Day Ave.	17	27.9	21.4	6.2	0	1	1	4	6	3	1	0	0	0	0	0

390 TSL Ltd

Direction: Westbound

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5mph	Bin 2 5-10	Bin 3 10-15	Bin 4 15-20	Bin 5 20-25	Bin 6 25-30	Bin 7 30-35	Bin 8 35-40	Bin 9 40-45	Bin 10 45-50	Bin 11 50-55	Bin 12 >=55
Thu 28 Apr 2022	25	25.9	19.9	5.8	0	2	3	5	11	4	0	0	0	0	0	0
Fri 29 Apr 2022	25	24.9	20.7	4.1	0	0	2	8	12	3	0	0	0	0	0	0
Sat 30 Apr 2022	28	27.9	22.3	5.4	0	0	1	10	9	5	3	0	0	0	0	0
Sun 1 May 2022	19	27.8	20.7	6.9	0	2	2	3	7	4	1	0	0	0	0	0
Mon 2 May 2022	14	25.3	21.1	4.1	0	0	1	4	7	2	0	0	0	0	0	0
Tue 3 May 2022	19	25.9	19.9	5.9	0	1	3	4	9	1	1	0	0	0	0	0
Wed 4 May 2022	26	26.8	21.5	5.1	0	1	0	9	10	5	1	0	0	0	0	0
5 Day Ave.	22	25.8	20.6	5.0	0	1	2	6	10	3	0	0	0	0	0	0
7 Day Ave.	22	26.4	20.9	5.9	0	1	2	6	9	3	1	0	0	0	0	0

390 TSL Ltd

Direction: Total Flow

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5mph	Bin 2 5-10	Bin 3 10-15	Bin 4 15-20	Bin 5 20-25	Bin 6 25-30	Bin 7 30-35	Bin 8 35-40	Bin 9 40-45	Bin 10 45-50	Bin 11 50-55	Bin 12 >=55
Thu 28 Apr 2022	47	26.4	20.9	5.3	0	2	3	14	18	9	1	0	0	0	0	0
Fri 29 Apr 2022	41	28.3	21.9	4.2	0	0	2	10	21	7	1	0	0	0	0	0
Sat 30 Apr 2022	49	28.5	21.7	6.6	1	1	3	15	15	9	4	1	0	0	0	0
Sun 1 May 2022	36	26.4	19.0	7.2	0	4	8	7	9	6	2	0	0	0	0	0
Mon 2 May 2022	24	27.4	21.5	5.7	0	1	1	6	12	3	0	1	0	0	0	0
Tue 3 May 2022	34	26.8	20.3	6.3	0	2	4	9	14	3	1	1	0	0	0	0
Wed 4 May 2022	42	27.6	22.3	5.2	0	1	1	12	15	11	2	0	0	0	0	0
5 Day Ave.	38	26.9	21.4	5.3	0	1	2	10	16	7	1	0	0	0	0	0
7 Day Ave.	39	27.1	21.1	5.8	0	2	3	10	15	7	2	0	0	0	0	0

390 TSL Ltd

