APPENDIX 4

PROJECT CENTRE

Technical Note

Highways Review

Project	Land off Highfield Road, Sheppey	Job No	1000007836
Subject	Highways Review Response to Vectos Note (Doc Ref: 205427)	Issue	01
Prepared by	Rob Franklin	Date	08/06/22
Approved by	Ben Meekings	Date	08/06/22

Introduction

1.1 Swale Borough Council (SBC) 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 We (PCL) provided an initial highways review dated 12 April 2022, concluding further information was required before the proposal could be fully supported on highways grounds.

1.3 Vectos has provided a response (Document Reference: 205427), to our points deemed outstanding. This TN therefore outlines our concluding comments and the response provided by Vectos.

1.4 By way of summary, we consider the response provided by Vectos to be sufficient to address most of our initial concerns, noting:

- The scheme is considered compliant with relevant national and local highway policy.
- Additional information has been provided by Vectos and the design of the site access is considered suitable.
- All other matters are to be addressed at the reserved matters stage and therefore we have no further comments.

- The development is considered appropriate in relation to transport matters.

PCL Comments and Vectos Response

2.2 Our issued comments are bulleted below, with a summarised response from Vectos, detailing the key points, provided in italics.

Access Arrangement

- 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.
    - *"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."*

2.3 We acknowledge comments from KCC, however, this review is provided on behalf of SBC with their direct input.

2.4 Our wording of vehicles 'often' parking on the southern side of Highfield Road may not be conclusive, given a single site visit to the site.

2.5 With that said, no evidence of parking trends on Highfield Road have been provided by the applicant.

2.6 Given that there are no vehicle crossovers onto Highfield Road for approximately 15m and 16m to the west and east of the site access, respectively, there is opportunity for parking within the required visibility splays, which could occur regularly.

- *"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."*
- *"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."*

2.7 We acknowledge the information provided. Based on the number of dwellings proposed and associated vehicle trips, we accept that the site access will operate similar to the junctions highlighted in the Vectos response.

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

2.8 We acknowledge the information provided. Based on the road collision data provided, we acknowledge that there have been no reported road accidents on Highfield Road, or residential streets in the immediate area.

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

2.9 We acknowledge the information provided from Manual for Streets 2 and consider the commentary to be fair.

2.10 In relation to Table 1 of the Vectos report, which relates to traffic volumes and road speeds on Highfield Road, we have provided a response below, relating directly to the information provided.

- *"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."*

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Table 1: Vectos ATC Survey Results as Presented

Table 1: ATC Survey Results

	EB	WB	TOT	Avg Speed* W/B	Avg Speed* E/B	85th%ile Speed* W/B	85th%ile Speed* E/B
ATC West of Access							
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
ATC East of Access							
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

2.11 We acknowledge the ATC data, as requested. We have not been able to identify where the eastern and western survey locations were undertaken, as presented in Appendix C, however, we acknowledge these were taken somewhere on Highfield Road.

- *"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."*
- *"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."*
- *"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."*

2.12 We have reviewed the 85th percentile speeds as provided above and in Appendix C. It is evident that a high percentage of vehicles exceed the 20mph speed limit on Highfield Road, especially when travelling eastbound on Highfield Road.

2.13 However, we acknowledge the revised visibility assessment based on 85th percentile speeds on Highfield Road and conclude that visibility assessment provided as part of drawing 205427-A01 Rev D, is sufficient.

2.14 Based on the evidence provided, we conclude that double yellow lining is not required for the full length of the assessed visibility splay.

Internal Road Assessment

2.15 In relation to the internal road assessment, the Vectos response states:

- *"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."*
- *"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."*

2.16 In relation to the above, we acknowledge the design of the internal road is to be addressed at the reserved matters stage.

2.17 With that said, confirmation was requested relating to proposed traffic calming measures within the site to maintain a traffic speed of 10 mph, as per the forward visibility assessment submitted, as this link directly interacts with the proposed site access point on Highfield Road.

2.18 However, we also acknowledge the revised plan 205427_PD01_B which shows a 25m forward visibility assessment within the site and consider this to be sufficient to address our initial query. We consider 20mph speeds on approach to the site access to be more realistic and find the revised assessment sufficient.

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Policy Review

2.19 As part of our initial review, we requested:

- 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.

2.20 We have reviewed the revised policy compliance for the development. Based on the development proposal and the evidence submitted, we consider the development to comply with national and local planning policy and have no further comments.

Trip Generation Forecast

2.21 In relation to proposed traffic generation for the site, Vectos state:

- *"It is unclear as to why PCL has requested further analysis when they have already concluded that the vehicle trip generation forecast is low."*
- *It 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.*
- *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.

2.22 Our original response was clear why a revised assessment was requested, noting:

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

2.23 In addition, each development proposal being assessed on a site-by-site basis. With that said, we acknowledge that the use of census data for a development of this scale has been deemed appropriate by SBC before.

2.24 On this basis and given the information provided, we consider the trip generation for the site acceptable and consistent with other approved developments close to the site.

Conclusions

3.1 To summarise:

- We consider the response provided by Vectos to be sufficient to address most of our initial concerns, as documented in our initial response dated 12 April 2022, noting:
  - The scheme is considered compliant with relevant national and local highway policy,
  - Additional information has been provided by Vectos and the design of the site access is considered suitable.
  - All other matters are to be addressed at the reserved matters stage and therefore we have no further comments.
  - The development is considered appropriate in relation to transport matters.