



Technical Note

Highways Review

Project	21/505461/PSINF - HMP Stanford Hill	Job No	1000007836
Subject	Highways Review Technical Note	Issue	01
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Approved by	Ben Meekings	Date	07/06/22

Introduction

- 1.1 Swale Borough Council (SBC) has commissioned Project Centre (PCL) to provide a Technical Note (TN) reviewing highway matters relating to:
- HMP Stanford Hill, Church Road, Eastchurch, ME12 4AA - 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).
- 1.2 A Transport Statement (TS) was submitted by Ministry of Justice (MoJ) in November 2021 in support of a full planning application (21/505461/PSINF) for the extension of HM Prison Stanford Hill in the Isle of Sheppey.
- 1.3 A separate application was previously submitted by the applicant to extend the HM Stanford Prison car park by 40 spaces in March 2021 (21/501437/FULL) however, this application was withdrawn and these proposals are subsequently being considered as part of this application.
- 1.4 It is noted that there are ambitions to expand the wider prison site, with an additional application under consideration to increase resident capacity at HM Prison Elmley (21/506787/PSINF), with access from Brabazon Road via Church Road.
- 1.5 We (PCL) have been commissioned to review the submitted information in to the HMP Stanford Hill proposal outlined above.

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- 1.6 Concerns have been raised by Eastchurch Parish Councillors relating to highway safety on Church Road. As part of this review, we undertook a site visit on 26 May 2022, to identify any existing issues on Church Road. Given the sensitivity of the site, we did not review Brabazon Road.
- 1.7 By way of summary, the applicant must provide additional information before the proposal can be supported, including:
- o Demonstrate how the proposed development adheres to national and local policy, as highlighted in section 2 of this TN. In particular, we require the applicant to demonstrate how the development encourages active travel,
 - o Establish the number of prisoners expected to leave or arrive at the site each day. This should include:
 - Prisoner mode of travel, as well as the numbers of prisoners accessing the site, to determine the impact on the local highway network,
 - o We advise that the discussed shuttle bus, as demonstrated in the Travel Plan Statement (TPS), should be secured by a planning condition,
 - o The applicant should provide vehicle speed surveys on Church Road to determine whether there is an existing speed issue.

Policy Context**National Policy**

- 2.1 We have reviewed the Transport Statement (TS) and associated Travel Plan Statement (TPS) Revision A, in relation to national planning policies, noting:
- National Planning Policy Framework (NPPF)
 - o Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location (paragraph 110);
 - o Safe and suitable access to the site can be achieved for all users (paragraph 110);
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- 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 (paragraph 128);
- 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 (paragraph 104).
- In NPPF (paragraph 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".
- National Planning Practice Guidance (NPPG)
 - 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.



Local Policy

- 3.1 We have reviewed the TS and TPS in relation to Local Planning Policies, noting:
- SBC Parking Policy
 - Swale Borough Local Plan
 - Swale Transport Strategy
 - Kent Local Transport Plan 4 (LTP4)
 - Kent County Council Active Travel Strategy
- 3.2 Based on a review of the submitted documents against the national and local policy outlined above, due to the nature and location of the development, opportunities to promote sustainable travel and minimise dependency on vehicles are limited.
- 3.3 We note that the TPS outlines that the site can be accessed on foot, on bicycle and public transport. Whilst the proposed development is located within walking distance to a bus stop on Brabazon Road, it is noted that these services are infrequent and may be unattractive, particularly to visitors due to bus times and visiting times not coinciding.
- 3.4 It is noted that the bus services coinciding with prison change over times only serve Sheppey and not the mainland. We consider that buses might be considered a convenient mode of travel to staff members on the site, the majority of which are likely to travel from within Sheppey (paragraph 4.7 of the TS).
- 3.5 It is deemed that buses are unlikely to be used by visitors, as the buses which serve routes beyond Sheppey to the mainland do not coincide with visitor arrival or departure times, and visitors to the site are more likely to be travelling from further afield.
- 3.6 The submitted TPS outlines the following initiatives and measures to promote sustainable travel:
- Provide a Travel Information Pack for staff,
 - Promote events and increase awareness of active travel,
 - Provide a noticeboard on sustainable travel routes,
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- Provide promotional leaflets,
 - Provide plans indicating safe cycle routes and where cycle parking facilities are located,
 - Provide an active travel reward system for staff,
 - Promote car sharing,
 - Allocate priority parking to car sharers,
 - Provide four electric vehicle charging spaces on site,
 - Investigate the potential to provide a dedicated minibus between the Sheppey Prison Cluster and Sheerness Railway Station at key shift times.
- 3.7 We consider that the initiatives and measures outlined in the updated TPS to promote sustainable travel options (particularly cycling) are unlikely to lead to an uptake in active travel.
- 3.8 Due to the site being geographically isolated and accessed via an A road (A2500), it is considered unlikely that cycling or walking will be considered an attractive method of transport for staff or visitors. It is therefore considered imperative that the provision of a shuttle bus between the prison cluster and Sheerness Railway Station at key shift change times is secured as a condition of the planning application, and it is advised that the applicant considers how a shuttle bus service to Sheerness Railway Station can be accommodated during visiting times as well to increase the accessibility of the site for those who want to, or can use public transport as opposed to private vehicles.
- 3.9 Furthermore, access to the development is from Church Road via the A2500 which the LTP4 highlights experiences serious congestion. The submitted information on increased number of staff movements (4 two-way movements per day) is considered a negligible impact to the A2500.
- 3.10 As outlined in the TS, this is an open prison, so further information is required on predicted prisoner movements and their predicted mode. This information has not been provided at the time of this review. It is advised that information on prisoner movements, including which mode they are expected to travel are provided by the applicant before the application can be fully supported.
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- 3.11 Site observations and a conclusion about the necessity for measures to improve road safety on the local highway network can be found in Section 4 of this TN.

Road Safety on the Local Highway Network

- 4.1 A site visit was undertaken on 28 May 2022 and observations were made around existing road safety and speeding issues on Church Road, as required by SBC.
- 4.2 Specifically, concerns have been raised around staff from the prison cluster speeding along Church Road during shift change over times.
- 4.3 We have assessed collision data in the vicinity of the site including Church Road as provided in the TS and note that only one collision has occurred in the last five-year period, which related to vehicles turning and did not indicate speeding issues.
- 4.4 Based on a review of the provided data we consider there is no pattern of accidents recorded associated with speeding vehicles. As set in Section 5 of this TN, the prison extension will only result in a minor increase in staff vehicle trips (four trips per day).
- 4.5 Staff movements were raised as a key concern from Parish Councillors. Based on the evidence provided by the applicant it is therefore not anticipated that additional staff trips will adversely impact on the local highway network.
- 4.6 The following observations were made on Church Road:
- 40mph signs are mounted back-to-back with 30mph signs at the junction of Church Way and the Rowetts Way roundabout, however these were not illuminated, as illustrated in Figure 1.

Figure 1: 30mph signage in direction of prison at entry to Church Road



- 15mph speed limit signage is mounted back-to-back with 30mph signage at the entry to Church Road from Brabazon Road as shown in Figure 2, this signage is also not illuminated.

Figure 2: 30mph signage at entrance to Church Road from Brabazon Road



- A vehicle activated speed (VAS) sign was observed on Church Road close to the junction with Kent View Drive. It is noted this did not activate while on site, however, the green power light was on.
- Another VAS sign which is no longer functional was observed further to the north on Church Road, closer to the Rowetts Way roundabout.

4.7 It is advised that the applicant provides the following as part of the planning application:

- Vehicle speed surveys for both directions on Church Road, to determine whether there is an existing speed issue.

Vehicle Movements

Staff Movements

5.1 The TS assumes the normal staffing ratio during the day is:

- One operational staff member for every 16 prisoners,
- One non-operational staff member per 5 prisoners.

5.2 Existing staff numbers at the site are as follows:

- 29 operational staff,
- 93 non-operational staff.



- 5.3 With the number of prisoners increasing by 120, it has been assumed that the proposed site would add another:
- 8 operational staff,
 - 24 non-operational staff.
- 5.4 However, it is noted that in the response from the applicant to KCC Highways dated 3rd May 2022, the applicant has provided updated information on predicted staffing numbers from the Ministry of Justice (MoJ), as follows:
- 3 operational staff.
 - 10 non-operational staff.
- 5.5 The response from the applicant to KCC Highways notes that these 13 additional staff accessing the site will be working full-time Monday to Friday with occasional weekends, however below it is noted that this will only lead to 2 additional staff accessing the site daily (4 two-way movements).
- 5.6 We question whether this is an error and whether this is in reference to an additional 2 staff members accessing the site during peak hours.
- 5.7 Nonetheless, we acknowledged that the number of additional staff trips will be low and will not materially impact the local or strategic highway network.
- Visitor Movements**
- 5.8 The TS outlines that personal visits occur 4 days a week and official visits occur each day.
- 5.9 The proposed expansion is anticipated to generate up to an additional:
- 240 personal visits per month.
 - 60 personal visitors a week (15 personal visitors a day over four days).
 - 120 official visits per month.
 - 30 official visitors a week (4 per day over seven days).



- 5.10 The TS outlines visiting times are as follows:
- Personal visits, on Wednesdays, Thursdays, Saturdays and Sundays occur for a maximum of 2 hours between 13:45 and 15:45 and;
 - Official visits occur every morning for 2.5 hours between 09:00 and 11:30.
- 5.11 It is acknowledged that visiting times occur outside typical highway peak hours, and it is considered that the additional visitor trips resulting from the expansion of the site are considered negligible and will not cause a material impact to the local or strategic highway network.
- Prisoner Movements
- 5.12 As outlined in Section 1.3 of the TS, is acknowledged that HM Prison Standford Hill is an open prison.
- 5.13 At present, as outlined in Section 2.3 of the TS there is existing capacity to house 464 prisoners onsite, and approval is being sought for accommodation for an additional 120 prisoners.
- 5.14 As such it has been assumed that a prison population of up to 584 could have the capability to come and go from the site, however the TS does not address prisoner movements.
- 5.15 We request that the applicant addresses the number of daily potential prisoner movements and establishes which modes they are likely to use, before the application can be fully supported.



Conclusion

6.1 6.1 To conclude:

- Project Centre has reviewed highways matters relating to an application for two additional prison blocks housing 120 prisoners and an extension to the prison car park by 40 spaces.
- For the most part the development is considered acceptable however further information is required from the applicant before the proposed development can be fully supported:
 - Demonstrate how the proposed development adheres to national and local policy, as highlighted in section 2 of this TN. In particular, we require the applicant to demonstrate how the development encourages active travel,
 - Establish the number of prisoners expected to leave or arrive at the site each day. This should include:
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