



Mr S Harvey
Newington Parish Council
27 August 2022

Dear Mr. Harvey,

21/505722: Proposed Development of 46 Dwellings at 128 High Street, Newington

I can confirm that I have been instructed to review the transport work that has been submitted in support of the above planning application.

I am Director of Railton TPC Ltd, a transport planning consultancy that I set up ten years ago. In total, I have worked for over thirty years in the transport planning industry. I have dealt with the transport and access arrangements for a wide range of development types from local to strategic scale and have been involved with numerous transport studies for public and private sector clients. I have given evidence at informal hearings and numerous public inquiries, participated in Local Plan Inquiries and at a DCO Hearing.

The original Transport Statement (DHA, Sept. 2021) is available on the Swale Borough Council (SBC) Planning portal.

Kent County Council Highway Authority has submitted two consultation responses dealing with this application. The first is dated 04 February 2022 and identifies a number of issues requiring further information and clarification from the applicant. The second consultation response is dated 18 March 2022 and comments on additional information submitted subsequently. Further information is requested with regard to highway safety concerns arising from vehicle conflict at the site access/A2 junction. The response seeks further clarification before any overall view is adopted by the Highway Authority. National Highway has raised no objection to the proposals (response dated 03 March 2022)

I set out below my assessment of the transport information submitted by the applicant to date and my views as to the acceptability of the proposals from a transport and highways perspective.

Highway Safety Concerns at Proposed Site Access

I note the comment made by the Highway Authority in its response dated 18 March regarding the unacceptability of the vehicle access for No. 132 crossing the footway on the western access junction bell-mouth. I would agree that this arrangement is not acceptable for highway safety reasons.

The 18 March response also notes that the appropriate visibility splay to the east should be 43m (in accordance with Manual for Streets) but drawn to the edge of the carriageway rather than to a 1.0m offset as shown on the access drawing (DHA drawing H-01 rev. P3). When I scale from the drawing I find that a visibility of only 39m can be achieved to the edge of the carriageway. I also note that this visibility passes over the north-west corner

of property 132. It is not acceptable to assume that the brick pillar currently located just to the east of the north-west corner of the property boundary will remain as the visibility constraint into perpetuity. The visibility should be drawn to avoid passing over any third party land. The approach that has been adopted by the applicant is therefore unacceptable and the visibility needs to be redrawn. The implication is that the available visibility to the east is less than the 39m currently shown and does not, therefore, meet relevant standards.

Absence of Safe Pedestrian Route to Local Facilities

The Highway Authority, in its response dated 04 February notes that to access the village to the west requires crossing of the A2 but adds that, *'the carriageway is of a width and visibility along this section sufficient that it can be crossed by the majority of pedestrians in safety'*. The A2 is a very busy route and presents a significant barrier to movement for those with mobility impairments or for other groups such as parents with young children seeking to access the local school. The route via public right of way ZR61 and Callaways Lane, although bypassing the section of the A2 with no footway on the southern side, does not overcome the safety issue since there are no existing pedestrian crossings of the A2 between Callaways Lane and the centre of the village including Church Lane that leads to the local school. I therefore conclude that the site does not offer safe pedestrian access to most local facilities and no mitigation is proposed to overcome the problem.

Absence of Feasible Mitigation at Key Street Roundabout

The 04 Feb response from the Highway Authority identifies the requirement for a £31,200 contribution towards improvements at the Key Street roundabout. I have made the point in previous submissions in relation to other local development proposals that there is currently no viable scheme to increase the capacity of the Key Street roundabout. Reference has been made in other submissions supporting other developments to a more comprehensive signalisation scheme at the junction. Detailed modelling of the scheme has shown that it does not provide any improvement over the current limited signalisation arrangement. In the absence of a viable scheme there is no justification for requiring contributions since there is no certainty that the assumed mitigation can be delivered.

Lack of Credible Air Quality Mitigation

I note that the applicant is offering air quality mitigation (DHA Technical Note, July 2022). The mitigation takes the form of an annual bus pass for each dwelling, a three-year Network Railcard per dwelling and a contribution towards a local e-bike hire scheme. The Technical Note suggests that the mitigation could lead to a 10% reduction in car use. However, the evidence that is presented in support of the predicted change in travel behaviour is not compelling.

The benefit of the e-bike scheme is based on survey work undertaken in Brighton, a city that is well provided with cycle facilities. No designated cycle facilities are provided in Newington. The Technical Note quotes the research that clearly states that, *'Successful interventions to encourage a switch to cycling include separating cycle routes from other*

vehicles [...]'. In practical terms, the A2 is a very busy route and presents a highly threatening environment for cyclists. The benefit of any e-bike scheme is therefore likely to be very small indeed.

The other source of evidence to support the claim of a 10% reduction in car travel is taken from an evaluation of the 'Sustainable Towns Demonstration Project'. Newington is not a 'sustainable town' and any claim that it can be made into one with a few token contributions is unjustifiable. Bus use in Newington is currently at around 2% (2011 Census). To transfer 10% of car trips onto bus would require around a 4-fold increase in bus use. With no change in bus frequency, no extension of bus hours and no improvement to the bus network, an argument for such a quantum of change cannot be sustained. In terms of train travel, the network card does not allow reductions in price during peak periods and the train, by its nature, can only cater for a small proportion of trips given the limited number of destinations and the relative infrequency of services.

I conclude that the level of benefit suggested by the applicant grossly exaggerates that which could reasonably be expected and the level of mitigation is therefore also grossly over-estimated. I would therefore caution against making judgements as to the acceptability of the proposals on the basis of the applicant's predictions of the effectiveness of mitigation.

Failure to Consider Cumulative Impact

The Highway Authority has not explicitly dealt with the issue of cumulative impact. A development of 46 dwellings, in isolation, is unlikely to give rise to a level of new traffic that could lead to unacceptable highway capacity impacts on the wider highway network. However, there have recently been numerous planning applications for residential and other developments in and around Newington and there is concern locally that the cumulative impact of these developments may be severe.

Figure 1 attached summarises consented and proposed developments in the area. In total, including the 128 London Road development, 216 dwellings are proposed within Newington. The Paradise Farm brickearth extraction will generate 101 vehicle movements including 85 HGV movements per day, albeit over a limited period. In addition, four committed developments in the wider area have been identified that will generate additional vehicle movements on the A2 through Newington.

Table 1 attached summarises the trip generation of the various consented and proposed developments in the area. This shows that developments within Newington will generate 1,123 new vehicle trips per day on the local highway network. To this will be added 955 vehicle movements along the A2 associated with other committed development in the area. In relation to existing traffic flows on the A2, this additional traffic represents a 12% increase on a daily basis. In transport environmental terms, an increase in excess of 10% is deemed to be potentially significant in sensitive areas¹. Newington is a sensitive area as evidenced by the presence of an Air Quality Management Area (AQMA) covering the whole

1 See Guidelines for the Environmental Assessment of Road Traffic, Institute of Environmental Assessment, 1991

of the village. The recently implemented 20mph zone on the A2 in the village centre also points to the sensitivity of the area to traffic impact.


From the data that is available it is clear that in cumulative terms, the proposed development has the potential to lead to significant adverse impact.

Summary

In summary, there remain serious concerns over the safety of the proposed site access arrangements, the proposals fail to provide for a safe route for pedestrians between the site and the majority of local facilities, the predicted reduction in car use due to air quality mitigation is grossly exaggerated and the proposed development is likely to lead to a significant adverse cumulative highways impact when considered alongside other proposed local developments. In relation to the requested contribution towards improvements at the Keycol roundabout there is doubt as to whether this justifiable since no feasible scheme has been identified.

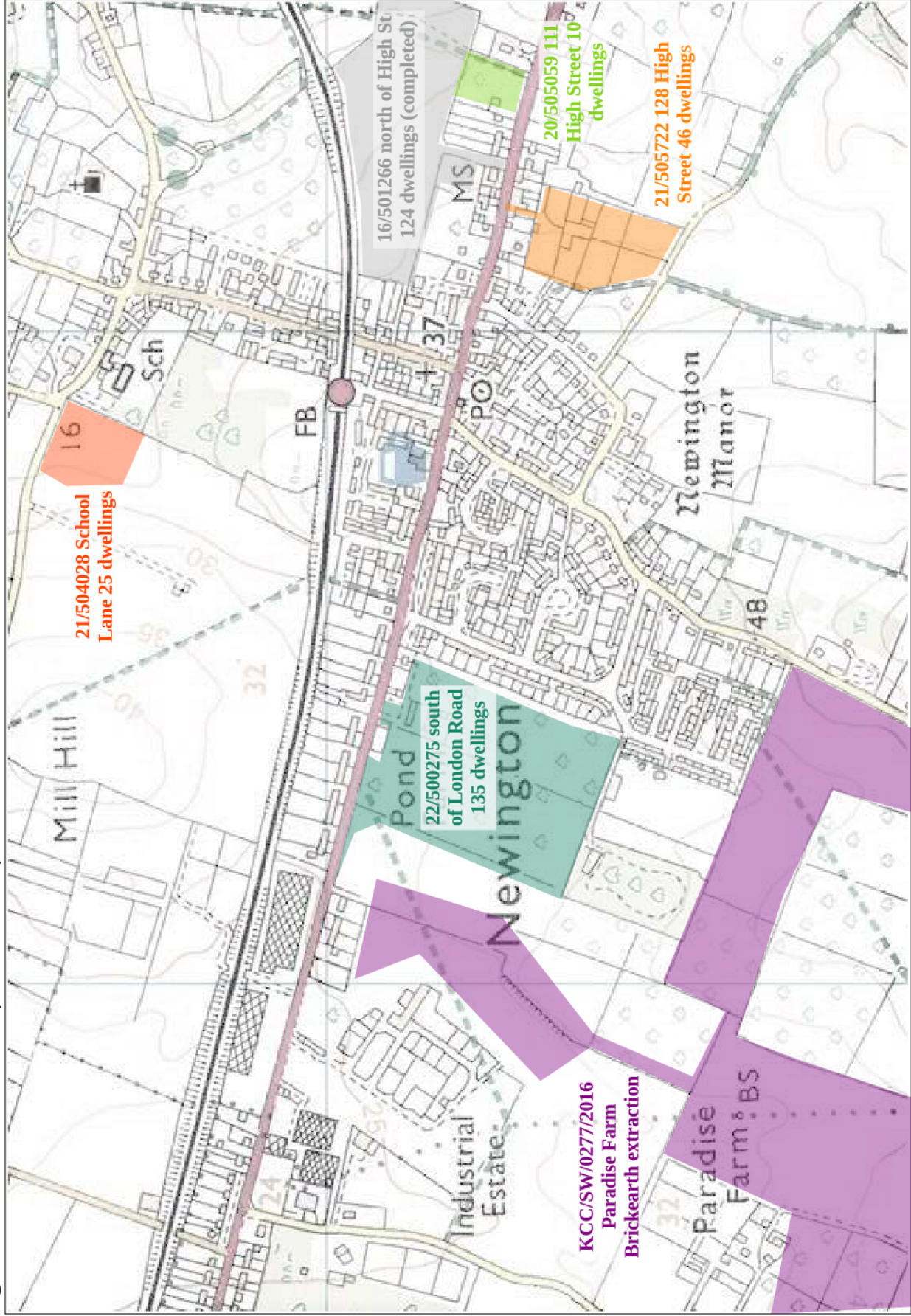
I trust the above is clear. Please do not hesitate to contact me if you have any queries.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "B Bamber".

Bruce Bamber BSc MA MSc MCIHT, Director

Figure 1: Consented and Proposed Developments



- 17/505711 Wises Lane 595 dwellings
- 18/502190 Quinton Road 852 dwellings
- 17/500727 Manor Farm Key St 50 dwellings
- 18/500258 Hill Farm Bobbing 20 dwellings

Table 1: Summary of Committed Traffic

app. Ref	name	description	2-way trips			% Daily Change
			AM Peak	PM Peak	Daily	
20/505059	111 High Street	10 dwellings	4	4	33	
21/505722	128 High Street	46 dwellings	21	20	200	
22/500275	Land south of London Rd	135 dwellings	84	89	715	
21/504028	School Lane	25 dwellings	9	9	74	
KCC/SW/0277/2016	Paradise Farm	Brickearth extraction			101	
		Total within Newington	118	122	1,123	6%
17/505711	Wises Lane	595 dwellings	35	35	289	
18/502190	Quinton Road	852 dwellings	70	63	550	
17/500727	Manor Farm Key St	50 dwellings	3	3	25	
18/500258	Hill Farm Bobbing	20 dwellings	11	11	91	
		Total through Newington on A2	119	112	955	5%
		Total				12%

Effect of M2 Junction 5 improvements 16 -13

2018 AADT A2 West of Callaways Lane (from Paradise Farm TA) **17,508**