Railton

Mr S Harvey

Newington Parish Council

06 August 2022

Dear Mr. Harvey,

21/504028: Proposed Development of 25 Dwellings at Land at School Lane, 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, July 2021) is available on the Swale Borough Council (SBC) Planning portal.

Kent County Council Highway Authority (KCCHA) has submitted two consultation responses dealing with this application. The first is dated 05 October 2021 and identifies a number of issues requiring further information and clarification from the applicant. The second consultation response is dated 04 May 2022 and comments on additional information submitted by the applicant with regard to traffic distribution, traffic impact, off-site works and internal layout. Further information is requested by the Highway Authority in relation to internal layout matters. The response does not state whether or not KCCHA is currently minded to offer its support for the proposals.

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.

Poor Access to Bus Services

The centre of the site is around 850m from the eastbound bus stop and 950m from the westbound bus stop. The recommended maximum distance between new development and bus stops is 400m[1] (a five minute walk). The site is therefore more than twice the recommended distance from bus services. It is further from bus services than any existing housing within Newington.

It is concluded that the site is poorly located to encourage the use of public transport.

1 See page 51 of Kent Design Guide, 'creating the design' that states, '*As a general rule, it is desirable for dwellings to be within 400 metres of a bus stop.*'

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Low Standard of Church Lane

Church Lane has limited capacity as a result of significant on-street parking along its length north of the A2. This reduces the street to single lane operation over significant lengths and requires drivers to seek gaps between parked vehicles to allow opposing traffic to pass. It is understood that these constraints already lead to drivers of the A2 wishing to turn into Church Lane, being forced to wait on the A2, thus blocking through traffic. Drivers may also be forced to brake suddenly while undertaking a turn into Church Lane as a result of vehicles on Church Lane being themselves forced to stop suddenly when confronted by oncoming vehicles. The on-street parking is the result of the majority of houses on both sides of the street having no off-street parking provision. This problem has been identified by the Highway Authority who also suggests the applicant consider new parking restrictions on Church Lane to ease the problem. It seems unlikely that any such traffic regulation order would be viable without local residents being provided with an alternative place to park their vehicles, a measure that has not been offered.

The proposed development, although modest in size, is likely to significantly increase the frequency of queues developing on Church Lane that have the potential to adversely affect traffic on the A2 thus exacerbating the existing highway safety concern relating to queueing on the A2.

The limited capacity of Church Lane already leads to vehicles queueing and waiting in the vicinity of the A2. The proposed development will increase the level of stationary traffic in the area thus further exacerbating the air quality concerns in the village. The issue is made more pressing when it is considered that the children attending the primary school are and will be exposed to these additional emissions while walking to and from school.

It is concluded that the constrained nature of Church Lane makes it highly sensitive to increases in traffic flows with potential adverse consequences both in terms of highway safety and in terms of air quality.

Impact on Trees and Hedgerows

The proposed site access as illustrated in DHA Drawing No. 15058-H-01 rev. P7 shows significant works around the site access to achieve safe visibility splays, to provide footways and create an access that can safely accommodate the various vehicle types that are expected to use it. The works will have a marked urbanising effect on the area and will require the removal of trees and vegetation along a 50m length on the southern side of Bricklands ('the road with no name') and the removal of vegetation to make way for a footway between the site access and the school access on the western side of School Lane. The introduction of a retaining wall on the north-eastern side of School Lane replacing the existing embankment to allow a footway to be constructed will further 'open up' and urbanise the area.

The overall impact of the works will be to significantly alter the rural character of the area. A further consequence of this will be to increase vehicle speeds, clearly undesirable in the vicinity of the school.

Impact on Lanes

Both School Lane and Bricklands are designated as 'rural lanes' under Policy DM26 of the Swale Local Plan. The policy states, '*Planning permission will not be granted for development that would either physically, or as a result of traffic levels, significantly harm the character of rural lanes. For those rural lanes shown on the Proposals Map, development proposals should have particular regard to their landscape, amenity, biodiversity and historic or archaeological importance*.' The proposed development will have a significant impact in terms of the removal of existing trees and roadside vegetation, in terms of altering the overall character of the lanes in the vicinity of the site access and in terms of increasing vehicle flows along School Lane and the section of Bricklands used for access. The proposals are therefore contrary to Local Plan Policy DM26.

Viability of Proposed Off-Site Mitigation

It is proposed to introduce a footway on the north- eastern side of School Lane south-east of the school access by removing the embankment and supporting the higher earth behind with a retaining structure. It is noted that the embankment has a height of around 1.5m. The applicant has provided no detail of the retaining structure and it is not clear whether there exists a viable engineering solution to achieve the standard of footway required while providing adequate support for the land and dwellings to the north-east. The applicant draws the line representing the retaining wall around 0.5m from the highway boundary in places and the retaining structure itself to have a width of 20-30cm (essentially the width of the line drawn on the plan). A simple retaining wall relying on gravity to withstand the pressure of the earth behind is likely to need to be 'battered', that is, wider at the base than at the top and could have a width of between half and three-quarters of its height; potentially a width of over 1.0m. The structure would be within around 4m of the adjacent houses. It is therefore hard to see how the proposal could be effectively implemented while allowing the provision of a footway that meets relevant safety standards.

Cumulative Impact

The Highway Authority has not explicitly dealt with the issue of cumulative impact but has sought a contribution towards a scheme to increase capacity at the A249 Keycol Junction (see Highway Authority response dated 05 October 2021). A development of 25 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 School Lane 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 areas[2]. Newington is a sensitive area as evidenced by the presence of an Air Quality Management Area (AQMA) covering the whole 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. The only mitigation that is proposed relates to the Keycol junction. No further mitigation is proposed to deal with the adverse impacts associated with increased traffic levels on the A2 through Newington village.

In summary, the proposed development suffers from very poor access to bus services, will add to congestion, highway safety and air quality concerns on Church Lane and the A2, is likely to lead to a significant adverse cumulative highways impact when considered alongside other proposed local developments, will lead to significant urbanisation of what are currently rural lanes and may fail to deliver safe pedestrian facilities along School Lane since the viability of the proposed retaining structure has not been demonstrated.

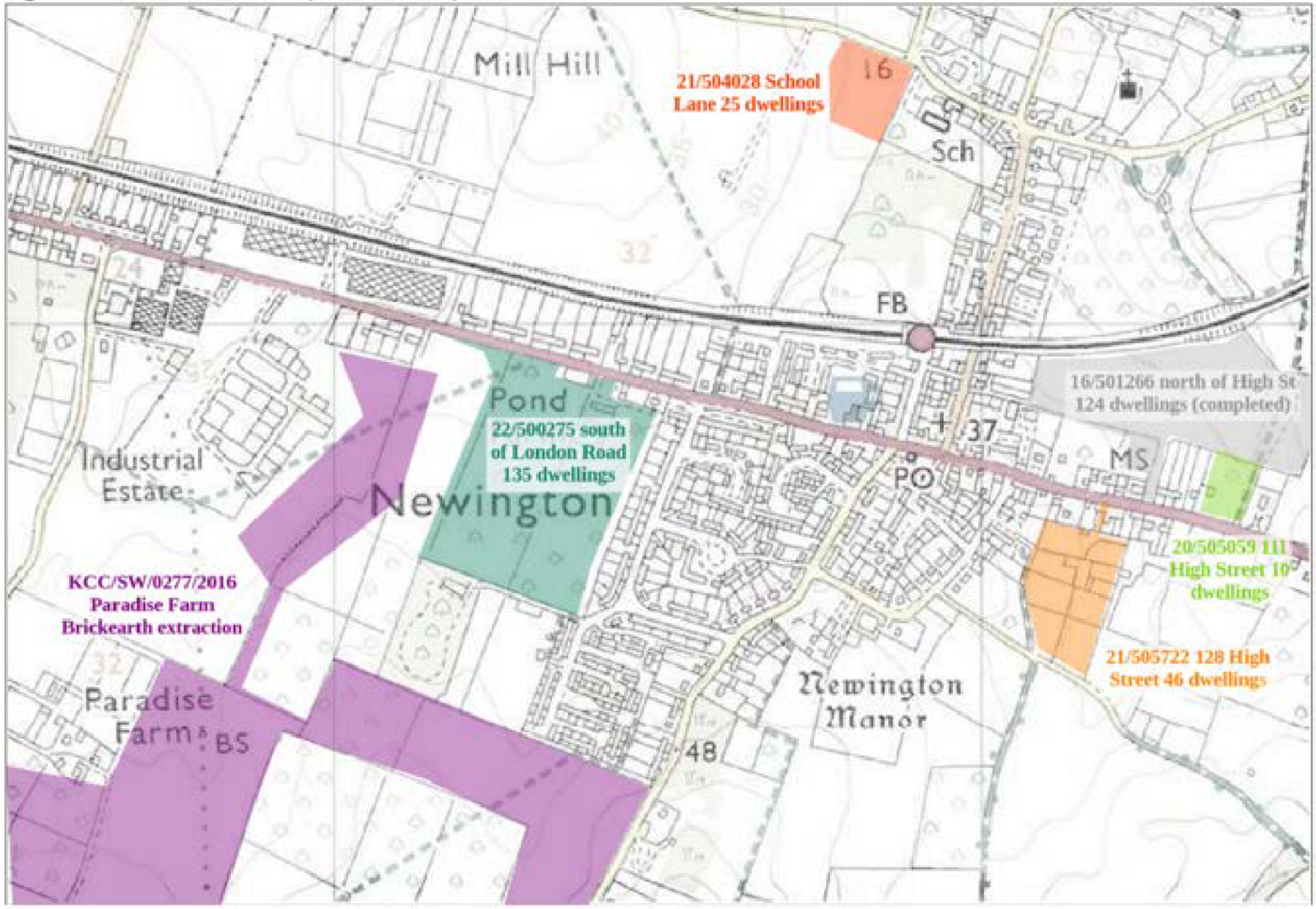
I trust the above is clear. Please do not hesitate to contact me if you have any queries.

Yours sincerely,

Bruce Bamber BSc MA MSc MCIHT, Director

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

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 AM Peak	2-way trips PM Peak	2-way trips Daily	% Daily Change
Developments within Newington	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%**
Developments generating traffic through Newington	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**	