Highways and Transportation
Ashford Highway Depot
4 Javelin Way
Ashford
TN24 8AD
Tel: 03000 418181
Date: 14 December 2022
Our Ref: MH

Ashford Borough Council
Civic Centre
Tannery Lane
Ashford
Kent
TN23 1PL

Application - PA/2022/2772
Location - Land south of Asda, Kimberley Way, Ashford
Proposal - Application for outline planning permission for up to 46,000 sqm of employment floorspace (Use Class E and B2) with all matters reserved except access (excluding internal circulation routes and links to pedestrian and cycle network) and change of use of land to parkland including flood storage area.

Thank you for the consultation on the above planning application. The proposals have been subject to significant discussions with the applicant to discuss the scope of the submitted Transport Assessment and proposed access arrangements in the form of a traffic signal junction onto the A2042 (Avenue Jacques Faucheux). Nonetheless, I have the following comments to make:

Transport Assessment

Chapter 4 - Existing and Proposed Use

Site Access - Pedestrians and Cycles

- KCC Highways and Transportation would wish to see the footway/cycleway on the corner between the A2042 and Norman Road be widened to provide a 3.5 metre wide segregated route to/from the existing toucan crossing on the A2042 and then up to the coach exit point on Kimberley Way. This would be in the form of a 2 metre cycleway and 1.5 metre wide footway. This is to make the proposal more compliant with Local Transport Note 1/20 due to the significant bend here due to the roundabout junction and to prevent potential conflicts between pedestrians and cyclists. These works are likely to require the provision of a retaining structure at the back of the footway / cycleway and require vegetation clearance / relocation of existing streetlighting. As such an amended plan should be submitted showing these improvements.
- KCC Highways and Transportation requests that the applicant provides a toucan crossing across Norman Road to link in with the existing footway / cycleway that runs through open space to the west of the A2042. This has been promoted as part of the Land at Norman Road planning application (PA/2022/2669), however this application has not yet been decided and so the provision of this toucan crossing cannot be guaranteed at this stage.
- All of these works will need to be delivered by a Section 278 Highway Agreement at the applicant's expense.

Site Access - Vehicles

- The provision of a signalised left in / left out arrangement onto Avenue Jacques Faucheux is accepted by KCC Highways and Transportation. As part of the access arrangement, the speed limit is proposed to be reduced to 50mph along Avenue Jacques Faucheux and so an Automatic Traffic Count (ATC) survey recording speed, volume and classification was carried out in November 2021 which showed that mean vehicle speeds were 52.6mph. The access onto the A2042 will be restricted to use by delivery vehicles (vans and HGVs) and emergency vehicles.
- A turntable is being proposed within the site so that vehicles can be turned around within the site. However, should for any reason the turntable stop working vehicle tracking has been undertaken to demonstrate that an articulated HGV can turn in the space. Given that HGVs can turn within the site it is questioned as to whether or not this turntable is actually required.
- A Road Safety Audit stage 1 was undertaken for the signalised arrangement of the site access onto the A2042. Following further discussions with KCC Highways and Transportation and the Road Safety Auditors, the drawing was amended, moving the access 125m north towards the outlet, and signals were added to the outlet southern car park slip road and the A2042. The access has been designed in accordance with CD109 and CD123 for a 50mph road. The location of the access provides at least the required stopping sight distance for a 50mph road, which is deemed to be sufficient for this class of road. Swept path analysis has been carried out assuming the maximum legal articulated vehicle (16.5 metres long).
- The submitted access drawing (332410583/100_100/004 Revision F) can be found in Appendix M of the Transport Assessment.

Parking

- 30 disabled parking spaces are being proposed, accessed via the Designer Outlet overflow car parking. These car parking spaces will need to meet minimum size requirements of 3.6 metres in width by 5.5 metres in length as part of any future Reserved Matters planning application. 3 of the spaces will need active charging provision and the other 27 spaces should have passive provision, in accordance with the Kent Design Guide parking standards. People can then access the building via the raised footway either by foot or by electric buggy that will be available to use.
- No further car parking is being proposed, which is accepted by KCC Highways and Transportation given the nature of the applicant's business and the fact that they are encouraging sustainable travel from the outset.
- Cycle parking will need to be provided for both Brompton Bikes and conventional bikes as part of any future reserved matters planning application.

<u>Chapter 5 - Transport Strategy</u>

Travel Plan

- A travel plan will be of key importance to support the provision of no general staff car parking being provided on site. The travel plan will need to set out the measures, targets, monitoring and reporting which the company will obligate to as part of planning conditions. This will be secured by planning condition and produced in detail as part of the first reserved matters planning application. A travel plan monitoring fee of £5,000 (£1,000 per annum over a 5 year period) is required so that KCC Highways and Transportation can effectively monitor the travel plan and ensure that appropriate measures are implemented from day 1 and appropriate targets are set out over a 5 year monitoring period. This will include a cycle loan and purchase scheme, cycling events for staff and the wider public, community involvement with local charities and schools, public transport discounts for staff, car parking management on roads within the Newtown and South Willesborough area (which are the two most likely locations for staff car parking) and Section 106 parking monitoring and

safeguarding of funding for potential controlled parking zones in the Newtown and South Willesborough area.

- A Construction Logistics Plan (CLP) will be required prior to the commencement of any works on site. This is due to the sensitive nature of the A2042 and the need to prevent lane closures within peak hour periods and also ensure that construction traffic accesses the site via the M20 Junction 10 and 10a and does not go via Ashford Town Centre.

Chapter 6 - Parking

- As discussed above there will be no car parking spaces provided at the proposed development site other than for mobility impaired drivers, hence the development will be considered 'car free development'.
- Brompton has entered into discussions with the operator of the HS1 car parks, including the large 1,200 space multi storey Eurostar car park and the surface car parks within the same area, and there is an agreement in principle between the parties for use of this car park on a paid-for arrangement.
- A parking strategy document will be developed by Brompton to outline the parking options available for staff. Details of this will need to be secured through a suitably worded planning condition requiring details prior to the occupation of any development on site.
- For the purpose of junction modelling, a worse case position has been assumed where all car trips use the nearest Outlet car park, as detailed further below.
- It is acknowledged that employees of Brompton could potentially park at the McArthur Glen southern car park due to its locality to the site. Whilst no on-site parking will be provided for employees as the ethos of Brompton is sustainable travel, it is recognised that there may be staff that are unable to use sustainable travel to get to and from work. However, it does not mean that Brompton wish to encourage driving and therefore a carefully balanced approach to parking will be used when confirming where and how users park within existing facilities nearby.
- Car parking data for the McArthur Glen southern car park has been submitted for a typical weekday and Saturday and a peak weekday and Saturday. The car parking does not reach its maximum occupancy levels on any of the above days. The maximum parking accumulation is below the total number of parking spaces available, with approximately 613 spaces still available during the peak parking period on a typical weekday, and 139 spaces available during the peak parking period on a peak weekday. On both an average and peak Saturday, the maximum parking accumulation is below the total number of parking spaces available, with approximately 507 spaces still available during the peak parking period on a typical Saturday, and 21 spaces available during the peak parking period on a peak Saturday. Whilst it is acknowledged that the peak Saturday accumulation is close to the 750 parking spaces, there are significantly less people working at Brompton on a weekend in comparison to a weekday. It is noted that the peak Saturday shown within the graph is in the run up to Christmas, which would only impact a few weekends of the year.
- On the days when there may be peak traffic to the Designer Outlet such as discount/promotion days, there may not be adequate capacity to accommodate the parking worst case. However there is still plenty of capacity in the HS1 car parks for Brompton staff which can easily be reached on foot / cycle.
- It is suggested that the in the car parking strategy that the applicant has regular discussions with the Designer Outlet management so that they are informed of the busy periods such as discount/promotion days and so Brompton staff will be able to make alternative arrangements such as the HS1 car park.

Chapter 7 - Existing Traffic Flows

- The following junctions were surveyed in November 2021. This was a time when there was no Covid-19 related restrictions and so is therefore acceptable to KCC Highways and

Transportation:

1. Priority roundabout of Norman Road / A2042 Romney Marsh Road / Kimberly Way;
2. Signal controlled junction of Newtown Road / A2042 Romney Marsh Road;
3. Priority roundabout of A2042 Ave Jacques Faucheux / A2042 Bad Munstereifel Road / Malcolm Sergeant Road;
4. A2042 / Elwick Road / Station Approach;
5. A2042 Beaver Rd / Victoria Road / A2042 Signal Junction
6. A2070 Bad Munstereifel Road / The Boulevard / Waterbrook Avenue.

- Appropriate TEMPRO growth factors have been used up to 2030 (which is the end of the Local Plan period)

Committed Developments

- The Designer Outlet expansion (14/01402/AS) should not be classed as a committed development as it was fully built out at the time of the traffic surveys and should therefore be removed.
- The land at Junction of Romney Marsh and North of Norman Road (19/00709/AS) application should be removed as this refused at a planning appeal.
- Elwick Phase 1 (15/01195/AS) should not be classed as a committed development as it was fully built out at the time of the traffic surveys and should therefore be removed.
- All of the above traffic figures should therefore be removed to avoid double counting.

<u>Chapter 8 - Traffic Generation, Distribution and Assignment</u>

- The existing Brompton site at Greenford has a current modal share of 33% car driver and 50% cyclist. The other 17% either walk or take public transport.
- The table below shows Brompton's aims for modal share based on a decide and provide approach. This is reasonable based on their existing Greenford site.

Mode	Mode Share
Train	2%
Bus or coach	4%
Taxi	0%
Motorcycle	1%
Driver of Car or Van	31%
Passenger in a car or van	9%
Bicycle	35%
On foot	18%

- The Greenford site has currently 150 parking spaces which are typically all utilised. As the proposed site is expected to have three times the floor space of the existing facility at Greenford, it is logical to assume the proposed site will have three times the number of employees and thus in a worst-case scenario a demand for three times the number of parking spaces. This equates to a demand of 450 spaces and thus 450 additional vehicles using the Ashford network to get to and from work, arriving to the site during the morning and leaving in the afternoon and evening.
- Data provided has shown that employees that currently work at the Greenford site have staggered start times, with most factory workers starting shifts at either 0600, 0630 or 0700

and finishing before 1700 or after 1800. The majority of non-factory workers, including customer services, sales, logistics, management etc, work 38 or 40-hour weeks. Therefore, it is assumed that they will start work between 0800-0900 and finish between 1700-1800. This is likely a worst-case scenario as many of the non-factory workers are expected to work from home several days a week, with such travel patterns now being typical in the post Covid-19 era.

- Even though the overall operation of the proposed site is likely to be similar to the existing site in Greenford, with an element of shift work and a number of similar roles, it is also likely that elements will be different as the proposed site will be much larger and producing a wider range of bicycle types (e.g. electric bicycles). Therefore, it is difficult to know at this stage exactly how many workers will arrive and leave within the peak hours (0800-0900 and 1700-1800) and how many will be working shifts and thus start and finish outside the peaks. Therefore, data from TRICS has been obtained to logic check and build on the first principles approach above. It also provides the opportunity to understand arrivals and departures per hour.
- Based on the TRICS assessment the site could generate 234 vehicle movements in the AM peak (8am-9am) and 230 vehicle movements in the PM peak (5pm-6pm) as set out in Table 8.4 of the Transport Assessment. This is acceptable to KCC Highways and Transportation.
- Brompton have highlighted that there are a variety of different vehicles that make deliveries to the site, which include HGVs and small delivery vans. The existing site in Greenford has approximately 59 deliveries a day to the site, which averages approximately 7 vehicles an hour. With the new proposed site to be three times as big as the existing site, this flow has been multiplied by three. This would equal an average of approximately 20 vehicles going to site each hour. This would be 40 two-way movements an hour.
- It is anticipated that all the delivery vehicles would arrives to the site from the M20 J10a, and enter the site from the south, U turning at the Norman Road/Kimberley Way roundabout and entering the site via the signalised left in left out arrangement along the A2042. All trips would leave the site via the left in left out arrangement and travel towards the M20 J10a. Details of this can be agreed as part of a delivery routing strategy condition prior to the occupation of any development on site.

Chapter 10 - Signal Controlled Site Access Junction

- This traffic signal junction will operate with plenty of spare capacity in a 2030 future year scenario with a maximum degree of saturation (DoS) of 54% on the Avenue Jacques Faucheux arm in the PM peak with a maximum queue of 8 vehicles.

Chapter 11 - Signal Controlled Junction at Station Approach / A2042 Station Road / Elwick Road and at Victoria Road / Beaver Road / A2042 Ave Jacques Faucheux

- These traffic signal junctions are operating in excess of capacity in a 2021 baseline year with a maximum DoS of 92.3% on Beaver Road A2042 Ahead Right in the AM peak and 91% on Station Road (A2042) Left Ahead in the PM peak. The practical reserve capacity is - 2.5% in the AM peak and -1.1% in the PM peak.
- In a 2030 Baseline the capacity worsens quite significantly with a worst maximum DoS of 108.8% on A2042 Romney Marsh Road Right in the AM peak and 109.2% on Station Road (A2042) Left Ahead in the PM Peak. The practical reserve capacity is -20.9% in the AM peak and -21.3% in the PM peak.
- In a 2030 scenario with development the capacity slightly worsens in the PM peak with journeys back towards Ashford Town Centre. This is however not considered to be severe as per the National Planning Policy Framework. The maximum DoS is 109.4% on Station Road (A2042) Left Ahead. The practical reserve capacity is -21.5%.
- Because of this slight worsening in capacity the applicant is proposing a minor adjustment to the staging sequence of the signals on the north side of Beaver Bridge. Within the

existing KCC traffic model, the pedestrian crossing on the Elwick Road exit arm, does not operate as a walk with traffic, only during an all red phase. A change has been made to the staging to allow this pedestrian crossing to operate with other staging and therefore adds additional traffic green time back into the model.

- The highway mitigation proposed is seen to improve practical reserve capacity by 2.5% in the AM peak hour and 5.2% in the PM peak hour, going to -17.5% in the AM peak and -16.3 in the PM peak.
- This mitigation should be secured through a suitably worded planning condition prior to the occupation of any development on site. This a very minor highway improvement which will be of minimal cost to the applicant.

Chapter 12 - Signal Controlled Junction at A2042 Avenue Jacques Faucheux / Newtown Road

- This traffic signal junction will operate with plenty of spare capacity in a 2030 future year scenario with development with a maximum degree of saturation (DoS) of 77% on A2042 Ahead Left in the PM peak and a queue of 12 vehicles.
- No highway mitigation measures are therefore required for this junction.

Chapter 13 - Priority Roundabout at A2042 Avenue Jacques Faucheux / Norman Road / Kimberley Way

- The roundabout junction will operate with plenty of spare capacity in a 2030 future year scenario with development with a maximum RFC of 0.58 on A2042 South arm in the AM peak and a queue of 1 vehicle.
- No highway mitigation measures are therefore required for this junction.

Chapter 14 - Priority Roundabout at A2042 Avenue Jacques Faucheux / A2042 Bad Munstereifel Road / Malcolm Sargent Road

- KCC Highways and Transportation have recently upgraded this roundabout through the use of turbo markings to indicate lane usage. This in effect reduces the number of conflict points at the roundabout.
- There are however wider plans by KCC to improve this roundabout through part signalisation, widening of entry arms and a bypass lane from the A2042 North to the A2042 Bad Munstereifel Road.
- Currently the turbo roundabout operates with minor queuing and delay on all arms in the AM and PM peaks as suggested in Table 14.1.
- The modelling results in a 2030 future year scenario without the proposed development show that in the AM Peak hour the junction operates with long delays and queues on the A2042 (E) arm, the Malcolm Sargent Road arm and the A2042 (S) arm. In the PM peak hour, the modelling results also show that the junction operates with long delays and queues and queues on the A2042 (E) arm and the A2042 (N) arm.
- The modelling results in a 2030 future year scenario with the proposed development show significant worsening on the A2042 (S) arm and the Malcolm Sargent Road arm in the AM peak. In the PM Peak there is significant worsening on the A2042 (E) arm and A2042 (N) arm.
- The traffic signal scheme significantly improves the operation of the junction such that the junction will still operate within capacity in both a 2030 baseline and a 2030 baseline plus development scenario with a maximum degree of saturation (DoS) of 89.5% on the Malcolm Sargent Road Left Ahead in the AM Peak together with a practical reserve capacity of 0.6% in a with development scenario. The PM peak modelling results are better still with a maximum degree of saturation of 67.9% on the A2070 (E) Exit Left Ahead together with a practical reserve capacity of 32.6% in a with development scenario.
- Funding for this improvement scheme has not been fully secured to date and so an

appropriate Section 106 contribution is required from this site. It has been identified in the Transport Assessment that there is the potential for 118 movements through this junction in the PM peak, although based on their likely modal share targets (31% driving a car compared to 2011 census data which suggests 61%) the likely number of movements is 60 movements so contributions should only be calculated on this basis. This equates to a required contribution of £564,942 and this should be payable prior to the occupation of any development on site. The financial contribution will need to be index linked from Quarter 4 2022 and be based on the construction price index (new work, infrastructure).

Chapter 15 - Signal Controlled Junction at A2070 / The Boulevard (Orbital Park – Bellamy Gurner)

- This junction is within the ownership of National Highways and so their views should be sought on the impact of the proposed development on this junction.
- This junction is being upgraded from a priority roundabout to a signalised junction and works are due to be completed by the end of January 2023. This will allow vehicles to be able to turn right out of Avocet Way (currently they can only turn left out).
- The signalised junction will operate just over capacity in a 2030 baseline and baseline plus development scenario and therefore a mitigation scheme is being proposed which involves minor adjustments to the stage sequence
- Table 15.4 is however exactly the same as Table 15.3 and does not identify the capacity improvements as a result of these adjustments. The Table should therefore be updated accordingly.

I look forward to further commenting on the planning application once additional information is submitted to address the above concerns.

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 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.