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Highways and Transportation
Ashford Highway Depot
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Tel: 03000 418181
Date: 6th May 2016

Application - CA/16/00600

Location - Land north and south of New Dover Road, Canterbury, extending north to Canterbury-Dover railway line, west to Nackington Road and south to A2.

Proposal - Hybrid planning application for the proposed South Canterbury urban extension, comprising: 1) Full (detailed) application proposals as shown on the associated plans for: 140 dwellings; vehicular, cycle and pedestrian access via New Dover Road; internal vehicular, cycle and pedestrian routes; drainage and utilities infrastructure; and public open space. 2) Outline application proposals with all Matters reserved except Access (but not including internal circulation) for the remainder of the Proposed Development as shown on the Parameter Plan, Land Use Budget, Green Infrastructure Plan, Building Heights Parameters and Access Arrangements Plans, comprising: up to 3,860 additional dwellings, amounting to a total of up to 4,000 dwellings; two primary schools on sites each of 2.05 hectares; a Community Hub, accommodating uses within classes A1-A5 (shops; financial and professional services; and food and drink outlets), B1 (business), C1 (hotel), C2 (residential institutions, including care ..

Thank you for consulting the Local Highway Authority on the above planning application. Whilst I currently have objections to the planning application it may be possible to overcome these objections if the following amendments were made as set out below. The comments made are in no particular order of relevance.

Transport Assessment and Drawings

4.3 Access Arrangements

New Dover Road - Phase 1 Access - The two most north-western properties (128 and 130 New Dover Road) do not have the ability to turn right into their dwellings or turn right out of their dwellings. KCC Highways are of the opinion that there is no imperative safety reason as to why these properties should not have the ability to manoeuvre to / from New Dover Road and the central island should therefore be shortened accordingly.

New Dover Road - Gyrotory Design - It is not clear from the application description whether or not the design of this gyrotory design is illustrative or approval is currently sought at this outline stage. This should be clarified with the applicant.

New Replacement A2 Junction - The Transport Assessment discusses the safety benefits of

the eventual closure of the A2 east-bound off-slip but does not currently discuss the journey time implications that this closure will have and how it will lengthen journey times for residents living in Bridge and also Bekesbourne and Patricxbourne. The Local Highway Authority understands the safety reasons needed for closure of this off-slip but this should not come at the potential expense of journey times for local residents of the above villages. The Local Highway Authority is also of the opinion that the proposed closure of the eastbound off-slip will help to prevent rat-running of vehicles from the A2 to the A257 Littlebourne Road as it will lead to an increase in journey time and make this route less attractive for motorists. Further information is therefore required as to how residents will be affected by this closure.

6.3 Anticipated Residential Trip Distributions

Under education both Barton Court Grammar School and Archbishop's School are likely to be schools which children aged 11-18 will attend and therefore need to be included in the analysis.

Under commuting/employment both Canterbury Christ Church University and the University of Creative Arts are major employers in the Canterbury city area and will therefore need to be included in the analysis.

6.11 Ancillary Land Uses

A hotel and care accommodation such as a care home or extra care facility will not generate internal or local trips only and therefore will have their own trip generation. This has not been included in the current trip generation figures for the commercial vehicle trips.

6.13 Effect of Highway Works

Banned Right Turn Movements at Junction 9 - The banning of right turn movements at this junction is likely to result in increased use of Puckle Lane onto South Canterbury Road and out of Ethelbert Road onto Old Dover Road both of which are sub standard junctions with poor visibility in a right direction out of both junctions. The visibility out of these junctions needs to be improved and therefore a suitable mitigation scheme needs to be put forward.

Banned Right Turn Movement at Junction 6 from St George's Place to Upper Chantry Lane. The current plan submitted for this junction (2013/1749/036) does not prevent this right hand turn manoeuvre from taking place and the Transport Assessment is therefore incorrect. The modelling results therefore need to be amended accordingly. Furthermore KCC Highways and Transportation have concerns about the use of Dover Street as the outbound fast bus link route due to the narrowness of Dover Street, the significant amount of on-street parking along Dover Street and the proximity of old listed buildings to the edge of the Dover Street, which are likely to have substandard foundations. The junction modelling for this junction will therefore need to be amended to provide this right hand turn movement.

7.1 Transport Infrastructure Phasing Strategy

The trigger points in relation to the various infrastructure improvements have not been agreed with KCC Highways and Transportation, apart from the temporary traffic lights on the A2 eastbound off-slip, new A2 junction, provision of Fast Bus Link and Park and Ride facility. Each of the infrastructure improvements needs to have an agreed trigger point in writing with both KCC Highways and Transportation and Canterbury City Council so that KCC Highways can be assured that the necessary transport infrastructure is provided prior to each respective phase of development.

7.2 Walking and Cycling Improvements

New Dover Road (2013/1749/01) - It is expected that the new Dover Road service road is surfaced in a block paving surfacing to make drivers aware that they are entering a shared use environment. Furthermore the left turn only into the service road should be a tighter radii to prevent any chance of vehicles trying to turn right into this service road from New Dover Road.

7.4 Fast Bus Link

The modal share targets associated with the planning application and subsequent expected trip rates are on the basis of the fast bus link from the site into the City Centre being provided. It is therefore imperative that the applicant provides the necessary parking restrictions along South Canterbury Road and Nunnery Fields in order to provide for this fast bus link as set out in drawing number (2013/1749/012). Policy SP3 of the Canterbury Local Plan requires the provision of the fast bus link from the development site into Canterbury as part of the draft allocation of this site and these parking restrictions are required in order to facilitate the fast bus link. The applicant should therefore contact my colleagues in the engineering department at Canterbury City Council in order to progress the Traffic Regulation Order required for the parking restrictions. The parking restrictions must be agreed and sealed before any planning permission for this site can be given as this is subject to separate legislation governed by the Highways Act which is outside of the planning application process.

Agreement needs to be reached between the applicant and East Kent Hospitals University Foundation Trust about how the fast bus will travel around the Kent and Canterbury hospital site and further details should be submitted with this application.

As stated above Dover Street is not felt to be an appropriate route for buses and buses should travelling along St George's Place before turning right at the signalised junction onto Upper Chantry Lane.

7.5 New Dover Road Bus Priority

It is unclear why the bus lane cannot be provided straight along New Dover Road and has to join in with general traffic opposite the junction of Barton Road and New Dover Road. The alignment of New Dover Road could be shifted slightly in order to provide a continuous bus and general traffic city bound and ensure journey time reliability for buses.

7.7 Capacity Improvements

Junction 11 and 12 Old Dover Road / Nackington Road / St Lawrence Road - The parking restrictions and subsequent Traffic Regulation Order that are required in order to provide the right hand turn lane from Old Dover Road into St Lawrence Road have not been submitted to the City Council. These are essential in order to provide the above junction improvement. The applicant should therefore contact my colleagues in the engineering department at Canterbury City Council in order to progress the Traffic Regulation Order required for the parking restrictions. The parking restrictions must be agreed and sealed before any planning permission for this site can be given as this is subject to separate legislation governed by the Highways Act which is outside of the planning application process. Furthermore KCC Highways and Transportation are of the opinion that to allow the side road arms of The Drive and St Lawrence Road to operate within the same stage as opposing arms is a highway safety concern. There is not space in the middle of the junction for vehicles wishing to turn right without obstructing the junction for vehicles wishing to do the opposite manoeuvre from the other opposing arm.

Junction 7: St George's Roundabout - KCC Highways and Transportation agree for a financial contribution of the improvements to the St George's Place arm of the roundabout being transferred to KCC Highways and Transportation via a Section 106 Agreement. The Highway Authority is currently working on a Ring Road review and an improvement to this junction is likely to take a different form to the above. The applicant will however need to cost these works so that they can form part any required Section 106 Agreement should there be a resolution to grant planning permission on the site.

Junction 1: A2 Off-Slip / Bekesbourne Road - In drawing number 2013/1749/108 the articulated vehicle coming off the A2 onto Bifrons Hill overhangs the grass verge and the wheels of the vehicle over-run the grass verge. Bifrons Hill is therefore required to be slightly widened in order to ensure that none of the vehicle and / or wheels overruns the grass verge.

8.5 - Junction 4 - Barton Road / New Dover Road

The PICADY analysis that has been undertaken for this junction assumes that the junction currently operates with free flowing traffic, which is not the case especially in the AM peak with traffic queuing slowly along New Dover Road at this point. The PICADY analysis that has been undertaken does not represent a true reflection of how this junction currently operates.

8.6 - Junction 5 - St Lawrence Road / New Dover Road

The PICADY analysis that has been undertaken for this junction assumes that the junction currently operates with free flowing traffic, which is not the case especially in the AM peak with traffic queuing slowly along New Dover Road at this point. No mitigation of this junction is proposed, which is unacceptable as the RFC on the St Lawrence Road both left and right will go above the 0.85 notional capacity of the junction. Furthermore the tight radii of this junction means that it is not possible to have two lane queuing for vehicles exiting both left and right. In the 2031 Do Something AM Peak Scenario B there will be a 17 vehicle queue (11+6 vehicles). Currently on-street car parking is allowed on St Lawrence Road in the form of 4 hour visitor bays. An increase in queuing of 15 vehicles will directly interfere with the free flow of traffic along St Lawrence Road as any car queuing next to the parked cars will block the road and prevent the free flow of traffic heading from New Dover Road to Old Dover Road. A suitable mitigation scheme for this junction is therefore required. No supporting evidence is provided to justify the applicants stance that the bus gate will allow platooning of traffic out of this junction onto New Dover Road.

8.7 - Junction 6 - St George's Place / Upper Chantry Lane / Lower Chantry Lane / New Dover Road

A formal pedestrian crossing point is required across Upper Chantry Lane in order that pedestrians accessing the city centre from the application site can safely cross the road here. Currently pedestrians have to cross Upper Chantry Lane under no control and traffic enters Upper Chantry Lane from 3 directions, confusing pedestrians whom are crossing the road here. The junction should therefore be re-modelled in order to provide for this signalised crossing point.

8.9 - Junction 8 - Riding Gate Roundabout

The ARCADY analysis that has been undertaken for this junction assumes that the junction currently operates with free flowing traffic, which is not the case as both in the AM and PM peak the traffic is queuing on all arms of the roundabout. The mitigation measures proposed of a wider entry width of the Old Dover Road arm is insufficient to achieve a nil detriment scenario

for the Old Dover Road arm for Scenario A and B with the RFC's increasing from 0.891 in the 2031 Do Minimum AM peak to 0.938 and 0.982 respectively. Further mitigation measures are therefore required to achieve a nil detriment scenario in order to prevent the blocking of the Vernon Place junction.

8.10 - Junction 9 - Oaten Hill / Nunnery Fields / Old Dover Road

The proposals will result in an increase in the use of buses coming out of Nunnery Fields onto Old Dover Road. Currently there is no formal crossing point for pedestrians wishing to cross Nunnery Fields from the St Mary Bredin Church to the other side of Nunnery Fields. The increase use of Nunnery Fields by buses will make it more difficult for pedestrians to cross Nunnery Fields and KCC Highways and Transportation are of the opinion that the pedestrian crossing point should be signalised in order to provide a safe crossing point for pedestrians. The junction should therefore be re-modelled in order to provide for this signalised crossing point.

8.15 - Junction A - (5-arm roundabout)

ARCADY modelling has been undertaken for Junction A, a new 5 arm roundabout within the development. The Transport Assessment references drawing number 2013/1749/100 however I am unable to take accurate measurements from the drawing, The junction is also shown in drawing 2013/1749/116 on which measurements have been annotated. The ARCADY file has differing geometry to that shown on drawing 2013/1749/116, clarification is required on the correct measurements/design of the junction and if necessary revised modelling is required. Given these discrepancies we have not been able to carry out any assessment of this part of the overall transport evidence.

10.4 M2 Junction 7 - Brenley Corner

Section 10.4.7 of the Transport Assessment highlights a maximum impact of 490 two way movements during the AM peak and 545 two way movements in the PM peak at the junction. Modelling of the junction is required to assess the impact of the development on this junction.

11.3 - 'Phase 2' Sensitivity Test

The Barton Road / New Dover Road junction and St Lawrence Road / New Dover Road junctions will suffer from significant increase in vehicle delay if the modal shift targets as set out in the Travel Plan submitted the planning application are not realised. The maximum increase in delay at the Barton Road / New Dover Road junction could be another 123 seconds for the Barton Road right arm in the PM peak. The maximum increase in delay at the St Lawrence Road / New Dover Road junction could be another 381 seconds for the St Lawrence Road left arm in the PM peak. This increase in delay will interact with the junction of The Drive / St Lawrence Road / Old Dover Road and will result in capacity issues at this junction with vehicles blocking it as a result of substantial queuing on St Lawrence Road. Further mitigation measures will need to be proposed in this Transport Assessment for these junctions in order to reduce vehicle delay in the event that the modal shift targets are not met.

Travel Plan

KCC Highways and Transportation are satisfied that the proposed travel plan targets is acceptable. However the provision of a 3 month free bus pass and then 50% off bus travel voucher for the rest of the two year period for new residents is not considered to be a suitable method of encouraging sustainable travel from the outset. It would be more appropriate for a free bus fare for all new residents for a 1 year period and then 50% off in the second year.

In order to effectively monitor the travel plan a Section 106 contribution of £20,000 will be required (£1,000 per annum over a 20 year period).

Phase 1A Site Layout

- 1) The cycle way does not connect with the new shared surface footway / cycle way along New Dover Road.
- 2) The adoption plan should include the proposed footways next to the internal spine road.
- 3) A 2 metre wide margin / footway is required in front of the parking spaces in front of Block 4 so that the parking spaces have appropriate visibility splays.
- 4) It is not clear what the street type is serving blocks 4 and 5. Please clarify the type of street
- 5) There are steps proposed in the footway / cycleway on blocks 2 and 3. This is unacceptable and the steps need to be moved to within the private threshold of the dwellings.
- 6) There is likely to be on-street car parking issues as a result of the tandem parking relationship for dwellings in block 5. IGN3: Kent Parking Standards does not accept the use of tandem parking in suburban locations such as this and therefore an alternative design solution is required.
- 7) A 1:500 scaled plan is required showing service margins / routes, indication of levels throughout the site and shared surfaces.
- 8) The current design of the junction in between blocks 2, 3, 4 and 5 is not clear as to whom has priority. This should be delineated through the use of block paved crossing points and the main road through the site having a tarmac surface.
- 9) The transition from a one to two lane approach travelling in a south easterly direction on New Dover Road is too sudden and a 1 in 20 taper should be used for this transition.
- 10) The visibility that can be achieved out of the side road serving block 4 is severely constrained by the row of trees in both directions. These trees should be removed or set to the back of the footway.
- 11) Speed restraint features are required every 60 metres for all major access roads. A further speed restraint feature is therefore required on the north / south road to the north of the main square.
- 12) A cycleway is required for the north / south road to the south of the main square. This must be a minimum of 3 metres width and act as a shared surface. From there the cycleway can continue on the southern side of the road travelling in an easterly direction.
- 13) Further details are required as to the exact brand / colour of the block paving proposed so that KCC Highways can be assured that this on the list of adoptable materials.

Notes - As part of the adoption of the internal spine road and to ensure ease of movement for all vehicles, double yellow lines will be required in order to ensure that no on-street car parking takes place. The provision of double yellow lines will be secured through the Section 38 Highway Agreement process.

Further Comments

The current planning application site masterplan does not provide land that is required for an Eastern By-pass from New Dover Road (A2050) to Littlebourne Road (A257) should the By-pass ever be required in the future. The draft Canterbury City Transport Strategy states that funding and consideration of the scheme justification/benefits will be kept under review. It is not clear from the current proposals where a connection point would be or even if the applicant has even considered this point and this needs to be addressed and to be made clear on the proposed masterplan for the site.

Yours faithfully

Matt Hogben

Principal Transport & Development Planner