

Mr S Harvey  
Newington Parish Council  
14 November 2022

Dear Mr. Harvey,

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

Further to my previous letter dated 27 August 2022, I have reviewed DHA's Transport Technical Note dated March 2022 and Kent County Council's (KCC's) response dated 25 August 2022. I note that although the Technical Note is dated March 2022, it did not appear on the Swale Planning Portal until 25 August 2022.

The Technical Note purports to deal with the concerns raised by KCC in their response dated 18 March 2022. KCC's earlier response identified concerns about the visibility splay from the proposed access road to the east being drawn to a 1m off-set from the kerb-line and safety concerns relating to access to the parking area for No. 132 High Street. I set out my comments below.

I previously raised a concern about the visibility splay to the east being drawn over third party land. I note that the revised drawing (15809 -H-01 rev P4) still shows the visibility drawn over land owned by No. 132 High Street. As it stands, the applicant relies on an off-set of 0.29m to achieve the necessary 43m visibility splay. If the visibility were to be drawn correctly over only highway land, it is likely that the off-set would need to be increased, potentially to 1.0m or above. KCC made it clear in the 18 March response that a 1.0m off-set would not be acceptable. I conclude that it has not been demonstrated that the proposed access achieves the necessary safe visibility standards.

The Technical Note argues that the proposed access arrangements improve safety in relation to access to the existing No. 132 parking area. The swept paths attached as Appendix B of the Technical Note show a vehicle reversing from the A2 westbound lane into the existing parking area. A second swept path shows a car turning into the access road and then reversing into the parking space. This second diagram is labelled, '*Car-Existing demonstrating car can not access drive from existing track*'. The diagram, however, shows that the car **can** access the parking area from the existing track. Further, no consideration is given to the forward manoeuvre into the parking space that appears to allow a car to then reverse out onto the access track and travel in a forward gear onto the A2. It therefore appears that the Technical Note has presented selective information to exaggerate the risks associated with the existing situation.

The Technical Note goes on to suggest that the manoeuvre using more of the access road would represent an improvement in terms of safety. The evidence that is available suggests that there will be no improvement in terms of a driver's ability to leave and enter the A2 in a forward gear. The Technical Note, however, glosses over the other impact of using the track as the main access into the proposed development which is that the route

will carry far higher traffic flows than at present. A car reversing into the parking space will be on the wrong side of the access road and vehicles approaching from the east will have limited visibility of the vehicle. The Technical Note states, '*Adequate visibility to a vehicle accessing the parking space can be achieved from approaching vehicles on the A2*' (para. 1.3.2) yet no evidence is provided to demonstrate whether or not this is the case. The presence of third party land tight up against the edge of the eastern side of the access road suggests very strongly that visibility for drivers approaching from the east would be very constrained.

I conclude that it has not been demonstrated that the proposed access arrangements do not lead to a reduction in highway safety in relation to access to the parking area of No. 132 High Street.

Both DHA and KCC refer to the fact that the parking safety issue was not identified in the initial site access Safety Audit. In my professional opinion, the Safety Audit should have considered this matter since it relates to an obvious potential conflict between highway users. Notwithstanding the strong likelihood that the lack of mention was a failure on the part of the safety auditor, I note that the access has changed significantly since the original safety audit was undertaken. In particular, the footway that was originally proposed on the eastern side of the access road has now been removed and the access road itself has been moved to the east. I would not, therefore, give any weight to the lack of comment in the original Safety Audit in coming to an overall conclusion about the safety issue relating to the parking area at No. 132 High Street.

Overall I conclude that the applicant has failed to demonstrate that the proposed development will not have an unacceptable impact in relation to highway safety.

I can also confirm that the additional information presented in the Technical Note does not deal with and certainly does not alter my concerns, previously described, relating to the absence of a safe pedestrian route to local facilities, the absence of feasible mitigation at the Key Street roundabout, the lack of credible air quality mitigation and the failure to consider cumulative impact.

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", with a long horizontal line extending to the right.

Bruce Bamber BSc MA MSc MCIHT, Director