



**Maidstone Borough Council**  
Maidstone Planning Department  
King Street  
Maidstone  
Kent  
ME15 6JQ

**Highways and Transportation**  
Ashford Highway Depot  
4 Javelin Way  
Ashford  
TN24 8AD  
**Tel:** 03000 418181  
**Date:** 5 April 2019

**Application - MBC/18/506656/FULL**  
**Location - Popesfield, Bearsted Road, Weaving, Kent**  
**Proposal - Erection of a new two-storey primary school and special educational needs secondary school with formation of new access onto Bearsted Road, together with associated car parking and drop off area, pedestrian access, drainage, areas for formal and informal outdoor play and landscaping works.**

Thank you for your consultation in relation to the above planning application.

It is noted that the application seeks full planning permission for the erection of a new two-storey primary school and special educational needs (SEN) secondary school at Pope's Field, Bearsted Road, Maidstone.

KCC Highways has reviewed the Transport Assessment (dated December 2018) and Transport Technical Note (dated March 2019) submitted alongside the application.

### **Access Strategy**

The proposed access arrangements via Gidds Pond Way form part of a school layout that, in effect, turns its back on its nearest residential community. This is not conducive to encouraging travel to school on foot in how it lengthens the home to school journey distances for many pupils and parents. The implication is that there will be higher levels of car dependency than could otherwise be achieved.

KCC Highways note that the new schools are intended to meet an urgent need for education provision in northern Maidstone. If this need is not met locally, it is likely that children will be transported over longer distances to attend school with an even greater likelihood that their journeys will involve travel by car. It is therefore accepted that an objection founded on the principle that new education developments should maximise sustainable travel opportunities and prioritise pedestrian movement is likely to be counter-intuitive in this instance.

### **Pedestrian Access Proposals**

KCC Highways maintain the view that any new school must be provided with satisfactory routes of access for pedestrians to ensure walking is a safe and attractive travel option for parents,

pupils and staff. The approach to the site along Gidds Pond Way and Newnham Court Way is to an appropriate standard in how it incorporates a continuous shared footway/cycleway.

Further to the west, the County Council's 'Bearsted Road Improvement Scheme', due to be implemented in Summer 2019, will afford improved footway provision along parts of Bearsted Road and New Cut Road. Importantly, the scheme will also provide additional controlled crossing facilities on the Newnham Court Way and Bearsted Road (east) arms of the New Cut roundabout, which will assist pedestrian movement.

To the south and east, the approach along Bearsted Road is currently hazardous for pedestrians on account of the narrow and disjointed nature of the footway provision. Paragraph 5.3.3 of the Transport Assessment (TA) confirms that '*the majority of future pupils will travel from the Weaving/Bearsted area*'. Many of these journeys, if undertaken on foot, will involve use of this part of Bearsted Road. Although this route has a relatively good crash record, with only one vehicle collision incident recorded in the last three years, KCC Highways regard it to be essential that pedestrian provision is improved in the interest of highway safety.

The applicant has proposed to widen the existing footways to achieve a minimum width of 1.5m, the minimum necessary to enable a pedestrian to pass an opposing pushchair or wheelchair user. Due to land constraints this footway widening has necessitated a narrowing of the carriageway width to a minimum of 5.5m. The narrowing is limited to the sections of the route with a relatively straight horizontal alignment and achieves the minimum necessary for two opposing Heavy Goods Vehicles to pass. KCC Highways regard this width to be acceptable in view of the designation of this part of Bearsted Road, as the C349 rather than the A249, and the benefits to pedestrian safety.

The land constraints mean that the applicant is unable to provide footways on both sides of carriageway. At two locations, where pedestrians are currently required to cross due to the one-sided nature of the footway arrangement, a narrower carriageway width of 4.1m is proposed to accommodate kerb build-outs that will form uncontrolled crossing points for pedestrians. The build-outs assist pedestrian safety in how they reduce the width of carriageway that pedestrians must cross, whilst also making waiting pedestrians more visible to oncoming road users.

Traffic flow at each of the build-outs is proposed to be managed as a one-way priority shuttle arrangement. This will result in queuing and delays along Bearsted Road, particularly during busy periods, although the western build-out alongside Gidds Pond Cottages will to some extent replicate the interruption to traffic flow currently caused by on-street parking.

The build-outs will require street lighting and support the applicants' proposal to extend the 30mph speed limit westwards along Bearsted Road as far as the New Cut roundabout.

A Stage 1 Road Safety Audit has been completed that has raised no substantive issues with the proposals, aside from the need for refuse bins to be kept clear of the footway outside Gidds Pond Cottages.

KCC Highways nonetheless wish to draw attention to the following:

- The western build-out will only be acceptable in the event that a new off-street parking area for Gidds Pond Cottages residents is delivered as part of the County Council's 'Bearsted

Road Improvement Scheme'. In addition, parking restrictions will be required to ensure that traffic flow on the approaches to the build-out is not impeded by parked vehicles.

- Traffic Regulation Orders will be required for the 30mph speed limit extension and the imposition of on-street parking restrictions alongside Gidde Pond Cottages.
- Keep clear markings will be required at the western build-out to ensure traffic flow, including the passage of emergency vehicles, is not blocked in the event of westbound queuing along Bearsted Road from the New Cut Roundabout.
- The design of the western build-out must accommodate the access and turning requirements of the existing properties on both sides of Bearsted Road at this location.
- On account of the road alignment and tree canopy, additional speed reduction and road user awareness measures will be required on the westbound approach to the western build-out.
- As Public Footpath KH47 provides the most direct walking route from the residential area immediately south of Weaving Heath, improvements to the route and its interface with Bearsted Road will be required.

KCC Highways require the above to be included in the applicants' mitigation proposals for Bearsted Road in order to maintain highway safety and effective traffic flow. On the basis that they can all be delivered by the applicant as part of a Section 278 Agreement, there is no ground for objection in this regard.

### **Travel Plan**

The applicant has submitted a 'Draft Travel Plan' to provide a basis for encouraging sustainable travel patterns and reducing vehicle trips over time.

The potential measures and initiatives put forward in the Travel Plan include a 'Walking Bus' scheme, cycle parking and training, public transport fare discounts, a car sharing database for staff, promotional material and the dissemination of travel information. Implementation will be overseen by a Travel Plan Co-ordinator.

The Travel Plan targets seek to achieve a 5% reduction in the proportion of pupils travelling by car and a 5% reduction in staff travelling in single-occupancy vehicles within the first five years. The applicant has also committed to registering with the KCC Jambusters resource as part of the monitoring regime.

KCC Highways will require the content of the Travel Plan to be developed further with a view to more ambitious targets being adopted to reduce levels of car dependency. A legal mechanism is also required that compels the applicant to identify and implement remedial measures in the event that the measured car mode share should exceed the target mode share specified in the Travel Plan.

### **Wider Highway Network Impact**

The trip generation forecasts in the TA and Transport Technical Note (TTN) assume that the primary school pupil mode share will be comparable to that of village schools in Maidstone

Borough where there are few opportunities for non-car travel. This has resulted in an assumption that 62% of primary school pupils will be driven to school, which KCC Highways regard to be a suitably robust basis for forecasting.

SEN pupil travel has been assumed to reflect trends at the Five Acre and Bower Grove schools, with 82% of pupils travelling by minibus. Staff travel has been based on 2011 Census Travel to Work data, with 80% predicted to travel by car.

The forecast trips have been adjusted to reflect known trends across Kent schools (attendance at school clubs, pupil absences and shared travel by siblings) and, in the case of the primary school, distributed in accordance with the catchment areas served by the nearby East Borough Primary, Roseacre Junior/Thurnham Infant and St. Johns Primary Schools. This is consistent with the purpose of the school to cater for unmet education demand in north Maidstone. Importantly, adjustments have also been made to the distribution to account for the greater dependency on car travel that is likely to exist in areas to the east of the site that are not within a suitable walking distance of 2km.

Capacity modelling of junctions has been undertaken for a 2028 horizon year, with background traffic growth and committed developments included. The key findings are summarised as follows:

- The school PM peak (15:00 – 16:00) will be prior to the network PM peak (17:00 – 18:00). The greatest impact will therefore arise in the AM peak (08:00 – 09:00).
- The upgrades to the New Cut and A249/M20 Link roundabouts on Bearsted Road as part of the County Council's 'Bearsted Road Improvement Scheme' are shown to satisfactorily accommodate the additional school traffic movements.
- Any queuing caused by the frequent activation of the controlled pedestrian crossings at the New Cut roundabout that are to be provided as part of the 'Bearsted Road Improvement Scheme' is likely to be transient in nature.
- By 2028 the A20 Ashford Road/New Cut Road junction is predicted to be approaching theoretical capacity (1) and the additional school traffic is shown to worsen the average delay by 6.3 seconds in the AM peak.
- By 2028 the A249 Chiltern Hundreds Roundabout is predicted to be above theoretical capacity and the additional school traffic is shown to worsen the average delay by 54 seconds in the AM peak. The Penenden Heath Road arm will be most affected, with 43 additional PCUs (2) in the queue in the AM peak.
- The signalised Bearsted Road/Eclipse Park junction, when accounting for the improvement proposed as part of the consented M&S store development, is shown to satisfactorily accommodate the additional school traffic movements.
- By 2028 M20 J7 is predicted to be above theoretical capacity and, in the event that it is signalised, the additional school traffic is shown to worsen the average delay by 10 seconds in the AM peak.

## Notes

(1) A measure of the overall performance of a junction, where the ratio of flow to capacity is at or above 100%.

(2) Passenger Car Units (PCUs) are a means of translating all types of vehicle into a common traffic 'currency'.

KCC Highways note that most of the impacts are likely to fall within the day-to-day variations in queuing and delay that can be expected to occur. They are not therefore of a severity sufficient to warrant mitigation.

The exception is the Chiltern Hundreds roundabout, where more pronounced increases in queuing and delay are predicted to occur. KCC Highways require that this impact is mitigated, either through Travel Plan measures aimed at ensuring Penenden Heath/Vinters Park parents and pupils travel without use of a car, or through physical improvement of the junction.

## **Car Parking**

The applicant has proposed to provide a car park with 82 staff parking spaces, 45 pick-up/drop-off spaces, 14 minibus drop-off bays and 2 minibus parking spaces.

SPG4 requires that a maximum of 1 space per member of staff plus 10% is provided. On the basis that the two schools will employ 110 staff, a maximum of 121 spaces should be provided. The proposed 82 staff spaces meet this requirement and accommodate the applicants' forecast demand of 81 members of staff travelling by car.

The 45 pick-up/drop-off spaces are proposed to cater for those parents wishing to access the primary school by car. Paragraph 5.3.3 of the TTN forecasts that a parking demand of 185 vehicles in the AM peak and 178 vehicles in the PM peak will be generated. The applicant has argued that the 45-space provision will be sufficient as some pupils will attend before/after school clubs (Table 5-5 of the TA specifies 20 pupils attending before school clubs and 30 pupils attending after school clubs) and there will be a turnover in the use of spaces. There will also be little or no overlap with the SEN school due to staggered start/finish times, which may enable some or all of the minibus spaces to also be used.

It is evident that the car-dependent nature of the proposals has served to inflate the car parking demand and there is limited scope for this to be wholly met within the confines of the site. Whilst KCC Highways accept that some turnover of spaces is likely to occur as pupils are dropped off in the morning, this is less likely in the afternoon as parents typically congregate in advance of the school day finishing. There is thus a high likelihood that the car park will become fully subscribed, even when allowing for on-site management by school staff.

Overspill parking is most likely to occur on the site access road and Gidds Pond Way, a private street that is subject to parking restrictions. Enforcement of those restrictions could encourage parents to park further afield. Although this raises the potential prospect of displaced parking on the wider KCC highway network, the likelihood is that the lengthy walking distance will instead prompt parents to queue and wait on Gidds Pond Way until on-site spaces become available. The Local Planning Authority may wish to consider the implications of such behaviour on air quality.

It is noted that paragraph 5.2.11 of the TA forecasts a potential parking demand of 23 taxis/minibuses based on a vehicle occupancy of five pupils. This may result in a level of demand for minibus parking that exceeds the proposed 16 space on-site capacity, although the

deployment of staggered school start/finish times should help to ensure that other on-site parking spaces are available for use if required.

The applicant has also proposed to provide 12 cycle parking spaces and 20 scooter parking spaces. This meets minimum requirements and there is scope for monitoring and potential expansion as part of the Travel Plan.

### **Recommendation**

KCC Highways do not raise an objection in respect of this planning application, subject to a condition being imposed that prevents occupation of the development until the 'Bearsted Road Improvement Scheme' has been implemented by KCC. This is reasonable and necessary on account of the proposed new schools requiring elements of this scheme to be in place for access and highway capacity purposes.

The recommendation of no objection is also subject to the applicant being required to enter into a Section 278 Agreement to secure the highway works on Bearsted Road and, as may be necessary, at the Chiltern Hundreds roundabout. The Travel Plan and its associated monitoring fee should be secured via a Section 106 Agreement to ensure there is a robust and effective mechanism for delivery and ongoing monitoring. KCC would want to be party to the Section 106 Agreement.

It should be noted that KCC Highways would object to this planning application if the above provisions are not secured as part of any planning consent, on the grounds that:

- the proposed development will generate an increase in pedestrian traffic on a highway network lacking adequate footways and crossing facilities, with consequential additional hazards to all users of the highway; and
- the proposed development will result in additional car journeys that will have a severe residual impact on the highway network.

The following should also be secured via planning conditions as part of any planning consent:

- Provision and permanent retention of the vehicle parking spaces shown on the submitted plans prior to opening of the school hereby permitted;
- Provision and permanent retention of vehicle loading/unloading and turning facilities shown on the submitted plans prior to opening of the school hereby permitted;
- Provision and permanent retention of the cycle parking spaces shown on the submitted plans prior to opening of the school hereby permitted;
- Completion and maintenance of the accesses shown on the submitted plans prior to opening of the school hereby permitted;
- Provision of measures to prevent the discharge of surface water onto the highway;
- Preparation and submission of a Construction Management Plan for approval by the planning and highway authorities; and

- Provision of wheel washing facilities prior to commencement of work on site.

INFORMATIVE: It is the responsibility of the applicant to ensure , before the development hereby approved is commenced, that all necessary highway approvals and consents where required are obtained and that the limits of highway boundary are clearly established in order to avoid any enforcement action being taken by the Highway Authority.

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 road. This is called 'highway land'. Some of this land is owned by The Kent County Council (KCC) whilst some are owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Information about how to clarify the highway boundary can be found at

<https://www.kent.gov.uk/roads-and-travel/what-we-look-after/highway-land/highway-boundary-enquiries>

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under such 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.

Yours faithfully

**Brendan Wright**

Principal Transport & Development Planner