

## Technical Note

Project No: ITL09289  
Project Title: Land at Appledore Road, Tenterden  
Title: Planning Application Highways Response  
Ref: NM/BC/ITL09289-024B TN  
Date: 14 April 2020

### **SECTION 1**      **Information**

1.1.1 This note has been prepared following Kent County Council's (KCC) highways consultation response letter (dated 4 March 2020) to the planning application on the Land between Woodchurch Road and Appledore Road, Tenterden, Kent (reference: 19/01788/AS).

1.1.2 The comments provided by KCC are further to those dated 16 January 2020 which i-Transport prepared a technical note response (ITL0928-023D TN).

1.1.3 In keeping with KCC's letter format, the main comments that have been addressed as part of this note fall into three main headings:

- Appledore Road;
- Woodchurch Road; and
- Footway and Bus Stop.

## SECTION 2 Appledore Road

### 2.1 CAVAT Tree Values

2.1.1 Appendix A of the technical note (ITL0928-023D TN) of 26 February 2020 set out in detail the applicant's response to the arboricultural issues raised in KCC's consultation response of 16th January 2020. It concluded that *'the applicant does not accept the CAVAT values stated by KCC as proportionate, accurate or reasonable. Use of the full CAVAT method yields values that are roughly a third of KCC's values and can be compared with the Helliwell system values that are roughly a tenth. Seeking compensation for such inflated values is not reasonable. Certainly, seeking the removal of a tree (no111) that does not need to be removed, despite whether or not it should be removed for Arboricultural reasons, is entirely unreasonable'*.

2.1.2 KCC in their response of the 4<sup>th</sup> March state:

'The confirmed CAVAT value as previously quoted in my consultation response for the amenity value of loss of the 3 highway horse chestnut trees on Appledore Road has been calculated from a site assessment of the 3 trees in questions by colleagues in KCC's soft landscaping team and is therefore correct. The tree on the southern side of Appledore Road opposite 13 Appledore Road should also be removed due to the limited life expectancy of that tree and that this tree is in effect a pair tree with the tree on the opposite side of the road which has to be removed as result of the development proposals'

2.1.3 Given the above, the applicant's arboriculturist contacted Barry McKenna in the soft landscaping team at KCC Highways and Transportation to arrange a site meeting to discuss the matter further. Whilst this was cancelled due to the current government advice regarding covid-19, the applicant's arboriculturist has been in discussions with Mr McKenna to discuss the valuation of the existing trees. During these discussions Mr McKenna confirmed that the valuation of the existing trees came from the Council's database which includes only the basic value of each tree, and that a full valuation would be more appropriate in this situation.

2.1.4 The total CAVAT value calculated by KCC as a result of doing a 'full' valuation and after discussion with the applicant's arboriculturist is quoted as £95,342.00.

2.1.5 Whilst noting that KCC has moved on from their original request for £230,956.19, we remain of the view that our full CAVAT valuation is a more appropriate calculation and that using the Helliwell system should not be entirely discounted. Our CAVAT calculation if we agree to the removal of all three trees being necessary would be £61,544, (£51,225 if it is agreed that tree no. 111 does not need to be removed). That said the applicant is, on a without prejudice basis, prepared to agree to the figure of £95,342 being included in the S106 agreement so as to move matters forward. Should the application go to appeal the applicant will however review their position accordingly.

## SECTION 3 Woodchurch Road

### 3.1 Site Access and Pedestrian Crossing

- 3.1.1 The visibility splays shown on drawing ITL9289-GA-044D are based on the existing speed limit and the recorded 85<sup>th</sup> percentile speeds from the Automatic Traffic Counter, both being based on stopping site distances from Manual for Streets 2. KCC has requested that a 93 metre stopping site distance be provided. This appears to be based on a combination of Manual for Streets 2 and DMRB calculations (which is not applicable to a 30mph speed limit road).
- 3.1.2 Review of recent guidance Department for Transport (DfT) Chapter 6 of the Traffic Signs Manual (2019) details recommended visibility distances for pedestrian crossings (Table 15-1). For a 35mph 85<sup>th</sup> percentile speed a stopping sight distance of 51m is recommended, and for a 40mph 85<sup>th</sup> percentile speed a stopping sight distance of 80m is recommended. The existing 85<sup>th</sup> percentile speed of traffic along Woodchurch Road at 38.3mph is somewhere between these two stopping sight distance recommendations.
- 3.1.3 As a worst case, and to show the requisite pedestrian visibility can be obtained on topographical survey, both 43m and an 80m visibility splays are shown on revised drawing ITL9289-GA-044E. At the request of KCC, these visibility splays have been shown to the edge of nearside carriageway on both sides rather than offset position previously shown (although it is considered the offset position is entirely appropriate in this instance, reflecting the likely position of a driver's line of sight to a pedestrian).
- 3.1.4 The visibility splays shown in ITL9289-GA-044E show that visibility is achievable for 85<sup>th</sup> percentile speeds up to 40mph in line with DfT Traffic Signs Manual and far above those typically required for a 30mph speed limit.

## SECTION 4 Footway and Bus Stop

### 4.1 New Bus Stops

- 4.1.1 As some parts of the site will be located more than 400m from the existing and proposed bus stops on Appledore Road and Woodchurch Road, KCC has requested that additional bus stops (with shelters) are provided on Woodchurch Road in the vicinity of the pedestrian access point and to introduce clearways on the approaches.
- 4.1.2 It should be noted that circa 80% of the site is located within 400m of an existing bus stop on either Woodchurch Road, Appledore Road, or Shrubcote. 100% of the residential element of the development is within 600m of one of these bus stops.
- 4.1.3 The 400m distance was originally recommended by Planning for Public Transport in Developments (1999). However that figure, which is rather dated, is guidance. 400m is generally taken to equate to a 5 minute walk time. However there is no national standard or universal agreement on what might be acceptable walking distances to a bus stop or other services/facilities. The Institute of Highways and Transportation's guidelines for journeys on foot suggest that for commuting, walking to school and recreational journeys, distances of 2km can be considered but that 500m is desirable. The Manual for Streets 2007 refers to 'walkable neighbourhoods' being typically characterised by 'having a range of facilities within 10 minutes – up to about 800m'. National Travel Survey data identifies the mean walking distance to a bus stop is 580m and the 85th percentile walking distance to a bus stop is 810m.
- 4.1.4 It is therefore considered that such small areas of the site that are beyond 400m, but still within 500m-600m of an existing bus stop, does not merit the need to introduce additional bus stop infrastructure on Woodchurch Road and therefore the request is unjustified.
- 4.1.5 As the relevant highway authority responsible for the maintenance and operation of Woodchurch Road, it is for KCC to provide new clearways on the bus stops on Woodchurch Road to prohibit inappropriate parking should they consider this to be an existing issue. The development proposal will not generate any demand for any additional on-street parking in these areas.
- 4.1.6 It is noted that the existing bus stop for the 2A eastbound route includes a new pole and flag with no shelter provided (shown in Image 4.1 below); this is common in Tenterden and reflects the character of the existing streets, including bus stops along Appledore Road, Oaks Road, Ashford Road (A28) and the High Street.

**Image 4.1 – Existing Eastbound Bus Stop along Woodchurch Road**



- 4.1.7 To be in keeping with the surrounding streets, and to ensure that the character of the surrounding streets is not adversely impacted, it is proposed that bus shelters are not provided at the existing or proposed bus stops by the junction of Woodchurch Road/Beacon Oak Road. As noted within the following section, the demand created by the proposal is also of insufficient volumes to warrant the need for new bus stop infrastructure.

## 4.2 Increased Frequency for Bus Route 2A

- 4.2.1 KCC has requested that the existing 2A bus route should be improved in both directions from two-hourly in the off-peak periods to hourly. This would require the developer to enter into a funding agreement with Stagecoach East Kent to provide this improved service upon the occupation of the 50<sup>th</sup> dwelling for a five-year period and to be secured through a Section 106 legal agreement.
- 4.2.2 In order to assess the demand for an increased bus service, the expected level of bus users from the development has been calculated. Using the agreed travel mode split from Census data (as contained within the Transport Assessment and Travel Plan Statement) the expected level of bus users can be

determined. The bus, minibus or coach mode split from Census (MSOA Ashford 013) is 2.2%, using this percentage from all modes trip generation the following development bus users are:

- 5 two-way bus trips in the AM peak hour;
- 5 two-way bus trips in the PM peak hour; and
- 43 two-way bus trips across the 12-hour day.

4.2.3 Subtracting the peak hour bus trips from the daily results in circa 33 two-way trips across the day; on average this equates to less than two bus trips per hour in each direction outside of the peaks. These would also be dispersed across the number of bus services available to future residents as set out in the TA – many of which provide a combined frequency of hourly or better, but at a slightly longer walk distance (the frequency would compensate for the additional walk distance).

4.2.4 Furthermore, the above is based on the full development of 250 residential units; if an improved service was introduced upon the occupation of the 50<sup>th</sup> dwelling as KCC suggest, the number of new bus users would be approximately one fifth of the total, seven two-way trips per day (or less than one per hour). It is also likely that the development will be built out from the east, in accordance with the detailed element of the application, and therefore an enhancement of Route 2A along Woodchurch Road would be of limited benefit to the majority of occupiers of the development.

4.2.5 It is therefore anticipated that on full occupation of 250 dwellings, the development would generate demand for two additional bus departure and two bus arrivals per hour outside of the peak hours. For the reasons set out previously, passengers are likely to be willing to walk slightly further to access more frequent services. However, even in the highly unlikely scenario that future occupiers would only be willing to walk 400m to bus stops on Woodchurch Road, the demand for such a small additional number of hourly passenger on a single route (2A) cannot justify the need for a doubling of the bus frequency from one every other hour to one per hour.

4.2.6 The level of expected bus patrons from the development for all local bus routes does therefore not represent the requirements for an increased bus service frequency and would not meet the three tests set out in the Community Infrastructure Levy (CIL) regulations 122. They are not necessary to make the development acceptable in planning terms and would not be fairly and reasonably related in scale and kind to the development (Paragraph 56 of the National Planning Policy Framework). Therefore, it is not proposed to provide funding for an increased bus frequency.

## SECTION 5 Summary

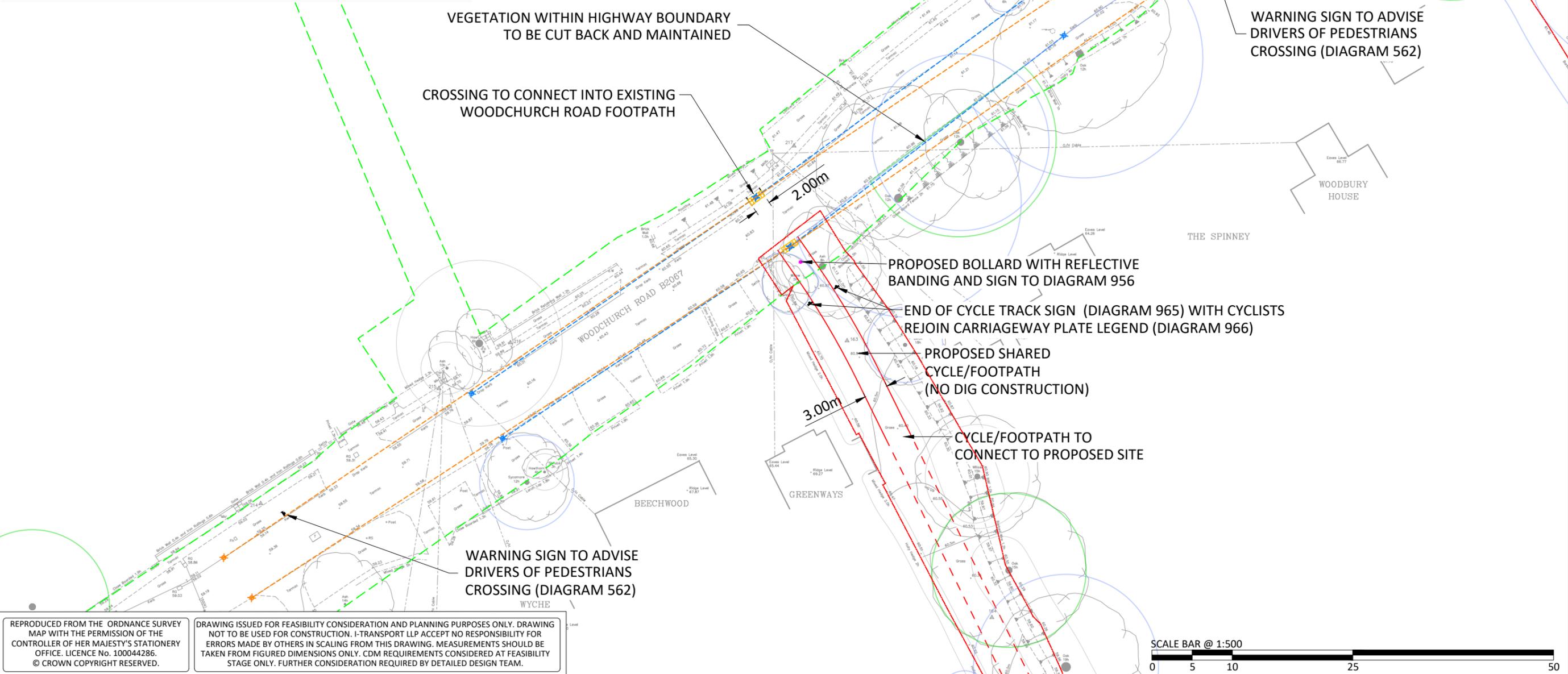
5.1.1 This response is in relation to KCC consultation letter dated 4 March 2020, to summarise:

- The total CAVAT value calculated by KCC as a result of doing a 'full' valuation and after discussion with the applicant's arboriculturist is quoted as £95,342.00. This is agreed for the S106 if the application is agreed at the local level;
- An updated drawing has been prepared with increased pedestrian visibility at the proposed Woodchurch Road crossing showing that the increased visibility splays can be achieved, this is in line with Manual for Streets guidance for the existing speed limit and Department for Transport guidance for 85<sup>th</sup> percentile speeds of 40mph;
- The existing and proposed bus stops on Woodchurch Road at the junction of Beacon Oak Road are within a reasonable distance of the development site, two additional bus stops along Woodchurch Road are not justified;
- To be in keeping with the surrounding streets it is proposed that bus shelters are not provided at the existing or proposed bus stops by the junction of Woodchurch Road/Beacon Oak Road; and
- The level of expected bus patrons from the development for all local bus routes, does not represent the requirements for an increased bus service frequency and would not meet the three tests set out in the CIL regulations 122 or paragraph 56 of the NPPF. Therefore, no funding is proposed for an increased bus frequency.

## **DRAWING**

**KEY**

- - - - - 43m PEDESTRIAN VISIBILITY, BASED ON 30mph SIGHT STOPPING DISTANCE
- - - - - 80m PEDESTRIAN VISIBILITY, BASED ON TABLE 15-1 OF TRAFFIC SIGNS MANUAL CHAPTER 6, 40mph 85 PERCENTILE SPEED
- - - - - HIGHWAY BOUNDARY
- - - - - SITE BOUNDARY



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REV	DATE	BY	DESCRIPTION	CHK	APD
E	18.03.20	JMc	VISIBILITY INCREASED	BC	NM
D	24.02.20	JMc	BOUNDARIES UPDATED	BC	NM
C	28.01.20	JMc	AMENDMENTS FOLLOWING STAGE 1 RSA	BC	NM
B	20.09.19	JMc	MINOR AMENDMENTS	BC	NM

STATUS: FOR INFORMATION

TITLE:	PROPOSED PEDESTRIAN AND CYCLE ACCESS FROM WOODCHURCH ROAD
PROJECT:	LAND AT APPLEDORE ROAD, TENTERDEN
CLIENT:	WATES DEVELOPMENT

SCALE @ A3:	1:500	CHECKED:	BC	APPROVED:	NM
FILE REF:		DRAWN:	JMc	DATE:	03.06.19
DRAWING No:	ITL9289-GA-044				
PROJECT No:	ITL9289	REV:	E		

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