

Project: LAND AT THE JUNCTION OF AERODROME ROAD/SPITFIRE WAY,
HAWKINGE - Planning Ref: 23/1972/FH
Document Title: TECHNICAL NOTE RESPONSE TO NATIONAL HIGHWAYS
Client: MASTERS KNOWLES DEVELOPMENTS LTD
Technical Note Ref: 5565-TNR
Document Ref: 5565-CON-XX-XX-RP-D-0001-S2-P01
Date: 28/03/2024

1. Introduction

Considine Ltd have prepared this Technical Note Response (TNR) in response to National Highways (NH) consultee comments for the above planning application. These NH consultee comments, dated 24th January 2024, are attached at **Appendix 1**. Reference should also be made to the Considine Transport Assessment Statement (Ref 5565 TA-P01 dated 11th July 2023) submitted for planning. NH currently recommend that planning permission should not be granted for a specified time to allow outstanding matters to be resolved. NH have concerns that the proposals will have an impact on the Strategic Road Network, the A20 in particular.

2. Considine Responses

Many of the issues within the NH consultee comments have already been discussed with them in relation to the DfT Transport Circular 01/2022. The items below have been concurred/noted by NH.

- The vision for the development in transport terms is to foster the use of sustainable modes of travel and with its position within Hawkinge, defined as a Service Centre in the FHDC Settlement Hierarchy, this is achievable. As demonstrated in the Transport Assessment (TA) document, the site is located within 15 minutes walks of a range of services and amenities and the proposed convenience store on the site will further enrich the sustainable credentials of the site and town.*
- Although the scheme is in outline, the proposed site street layout and car/cycle parking provision will accord with the principles of the Kent Design Guide (KDG) and will link in with the adjacent existing foot and cycle network. All dwellings will be less than a 400m walk to the nearest bus stops on Aerodrome Road. It should be noted that cycle parking spaces will be provided per bedroom/flat as well as an electric vehicle charging point for each dwelling in line with the KDG.*
- We are anticipating that any consent will have a Travel Plan condition attached that will need to be approved by KCC Highways before occupation of any of the dwellings on site. Measures such as Welcome Packs for residents, high speed broadband, cycle/bus vouchers would be included amongst others to encourage sustainable modes of travel to support the vision.*

NH have acknowledged the forecast trip generation for the proposals but have stated that these should be reviewed considering the DfT Circular. This will then allow them to determine whether there is a need for formal junction assessments to be undertaken as there are existing delays at the White Horse Hill A260/A20 roundabout junction. Taking the above items into account, it is considered that the forecast vehicle trip generation for the development could potentially be reduced by a typical 10% by an effective travel plan. Refer to **Appendix 2** for the initial weekday peak hour development vehicle

flow diagrams (that were submitted with the Transport Assessment) and **Appendix 3** similarly but with adjusted flows having a 10% reduction because of travel plan measures. With regards the A260/A20 roundabout, this reduction in vehicle movements would only result in one less vehicle on the busiest arm of this roundabout in both weekday AM and PM peak hours. Refer to Figures 2.1-2.4 of extracts of the vehicle flow diagrams below and on the following page.

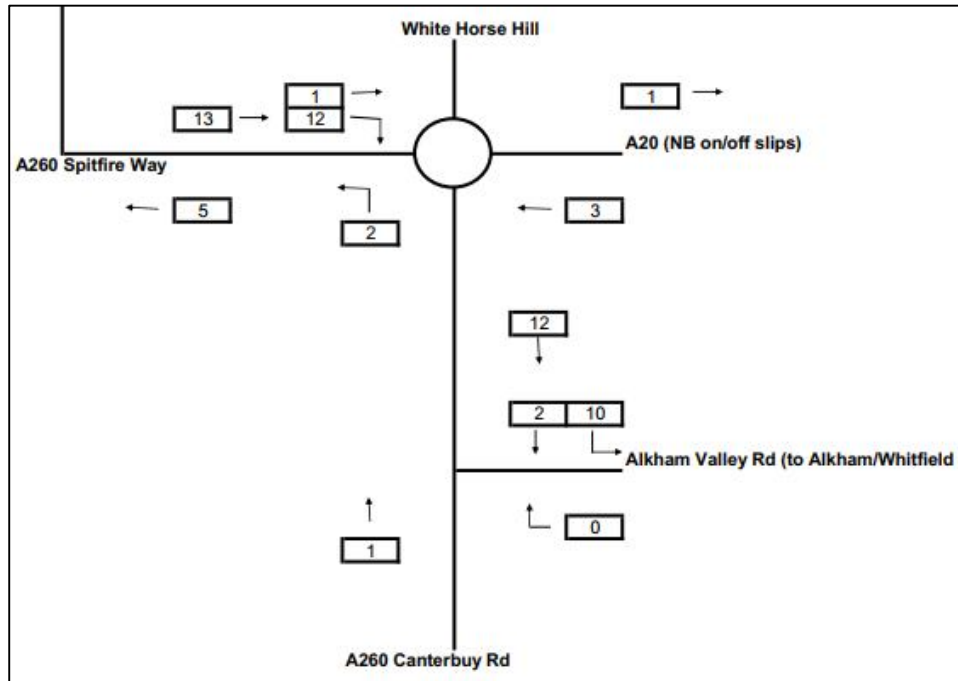


Figure 2-1 – AM Peak Hour Development Flows at A260/A20 Roundabout – No Travel Plan

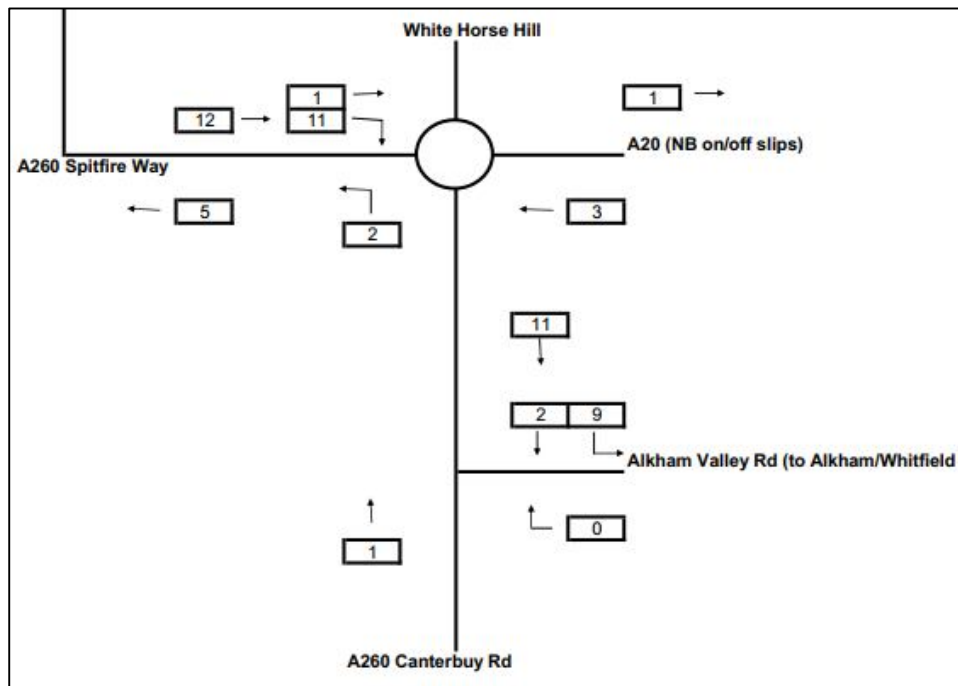


Figure 2-2 – AM Peak Hour Development Flows at A260/A20 Roundabout – With Travel Plan

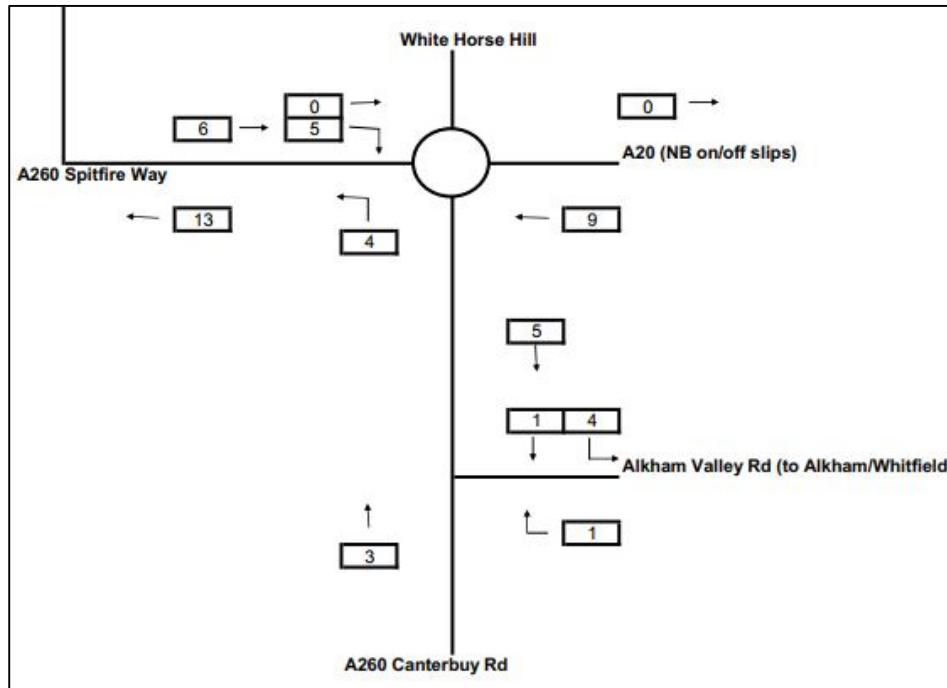


Figure 2-3 – PM Peak Hour Development Flows at A260/A20 Roundabout – No Travel Plan

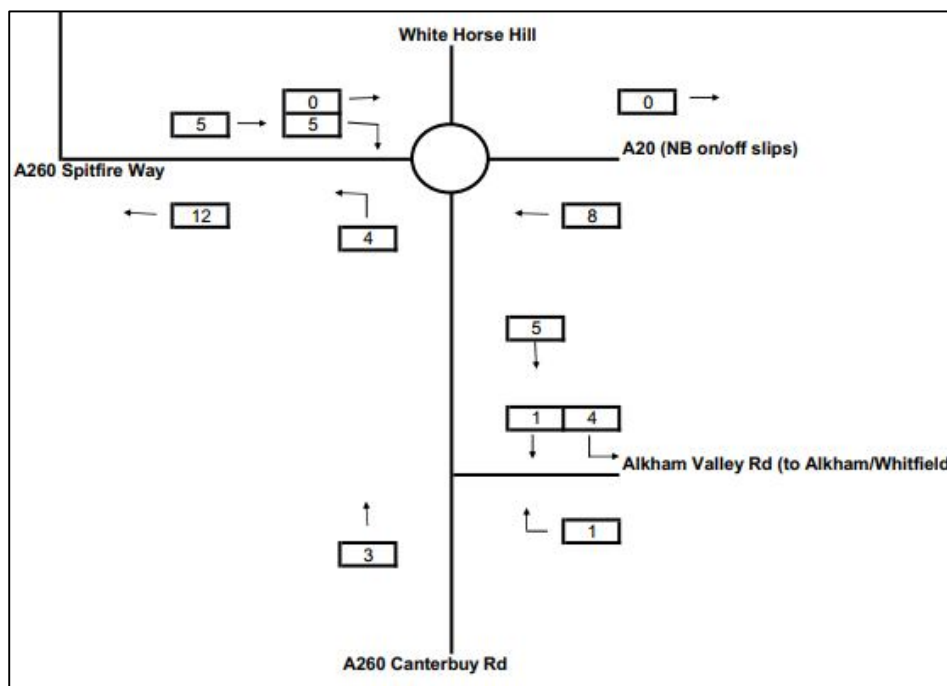


Figure 2-4 – PM Peak Hour Development Flows at A260/A20 Roundabout – With Travel Plan

Even a more effective Travel Plan that could reduce vehicle flows by 20% would only reduce flows on the busiest roundabout arms by a further vehicle movement. As can be seen on Figures 2.2 and 2.4 on the previous page and above, the vehicle movements from the A20 roundabout entrance are 3 and 8 vehicle movements in the AM and PM peak hours respectively. This equates on average to one additional vehicle movement every 20 and 7.5 minutes during the peak hours. These de minimis vehicle movements are well within the daily traffic variation for this roundabout entrance arm.

To prove this, reference has been made to NH's WEBTRIS Service for recently recorded vehicle flows on this entrance arm (off-slip) and these are included in **Appendix 4**. The latest traffic flow data currently available is from Monday 26th February to Thursday 29th February, 2024. It is evident from the data that Monday hourly vehicle flows are lower than Tuesday-Thursday flows and have therefore been removed from the daily variation calculations in Table 4.1 below. This demonstrates that the proposed additional development flows would not be discernible and have a negligible effect on the current junction operation or any queuing along the A20 off-slip.

Table 2-1 – Traffic Data from WEBTRIS A20 off-slip

Date	AM Peak Hr (08:00-09:00)	PM Peak Hr (17:00-18:00)
Tuesday 27 th Feb, 2024	452	960
Wednesday 27 th Feb, 2024	497	889
Thursday 27 th Feb, 2024	469	913
Average Day	473	921
Daily Variation %	+/- 5%	+/-4%

Note: Average Day and % Figures have been rounded to nearest whole number.

3. Conclusions

It is concluded that the proposed development would generate minimal additional vehicle movements at the A260/A20 roundabout junction which are well within the daily variations of vehicle movements at this junction. The vehicle trip reductions as a result of an effective travel plan would only reduce vehicle movements at this junction by the odd vehicle movement due to the small number of initial predicted trips. Therefore, further junction assessments are not considered warranted for the A260/A20 junction in connection with this size of proposal.

Prepared By: Mike Seare BEng (Hons) MCIHT

Checked By: Roland Cooper BEng, CEng, MICE, IMaPS

Approved By: Roland Cooper BEng, CEng, MICE, IMaPS

Appendices

- Appendix – 1 National Highways Consultee Comments dated 24th Jan, 2024
- Appendix – 2 Weekday AM & PM Development Flow Diagrams (from App 10 of TA)
- Appendix – 3 Weekday AM & PM Development Flow Diagrams with Travel Plan Reduction
- Appendix – 4 WEBTRIS data for A20 northbound exit slip

Appendix 1 – National Highways Consultee Comments dated 24th Jan, 2024



National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

From: Christine Allen, Regional Director
Operations Directorate
South East Region
National Highways
PlanningSE@nationalhighways.co.uk

To: Folkestone & Hythe District Council (FAO Mr A Stafford)
planning@folkestone-hythe.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 23/1972/FH

Location: Land at the Junction of Aerodrome Road & Spitfire Way, Hawkinge

Proposal: Outline planning permission, with all other matters reserved (except for access & landscaping) for a mixed use development, comprising up to 53 dwellings comprising 37 houses and 16 flats, with a provision of up to 13 self/custom-build homes, and 13 'affordable' homes; together with up to 400 sq.m of convenience retail development (Class E), including access from Spitfire Way, landscaping, and new pedestrian access route

National Highways Ref: NH/24/04419

Referring to the consultation on a planning application dated 8 January 2024 referenced above, in the vicinity of the A20 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~

c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);

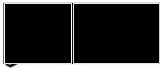
d) ~~recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningSE@nationalhighways.co.uk.

Signature:  	Date: 24 January 2024
Name: Nigel De Wit	Position: Assistant Spatial Planner National Highways
National Highways Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ planningSE@nationalhighways.co.uk	

¹ Where relevant, further information will be provided within Annex A.

Annex A **National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommended Non-Approval

It is recommended that the application should not be approved until **24 April 2024**.

Reasons

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of the A20 near Hawkinge.

We have reviewed the Transport Statement (dated 11 July 2023) which has been submitted to us and our comments are provided below.

We require further information to be provided by the applicant on this application in order that an informed decision can be made in relation to the potential impacts of the development on the strategic road network. In particular, the following comments should be passed onto the applicant:

Throughout this response **ACTION points** for the applicant are highlighted in **underlined bold**.

Policy Context

The TS contains reference to a number of policy documents.

The Department for Transport released a new document setting out the policy of the Secretary of State in relation to the SRN on 23 December 2022. The document, entitled 'Strategic Road network and the delivery of sustainable development', replaces the policies in the Department for Transport circular 02/2013 of the same title.

The document can be accessed online:

<https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development/strategic-road-network-and-the-delivery-of-sustainable-development>.

There is a need for reference and adherence to be made to Department for Transport Circular 01/2022.

Trip Rates and Trip Generation

The submitted information is not compliant with DfT Circular 01/22 in terms of trip generation.

The below diagram illustrates the iterative process and evidence base that is now required in line with the circular.



With reference the circular, we require the vision for the development. This should describe the aims of the development in terms of transport and explain how the aims are in line with the circular. We expect development promoters to enable a reduction in the need to travel by private car and prioritise sustainable transport opportunities, ahead of capacity enhancements and new connections on the SRN.

For residential-led developments, due consideration should be given to home and street layouts, broadband infrastructure, safe and secure cycle parking, and access to local amenities and open space in support of these aims, while mobility or micro mobility hubs should be provided in larger schemes. In addition, high-powered and open-access EV charge points should be installed where developments include on-street or communal parking to support the government's objective to end the sale of new conventional petrol and diesel cars/vans by 2035.

Once the vision and supporting approach are agreed upon, it would be appropriate to move onto an assessment of residual transport impacts. This should be undertaken in line with the circular, particularly paragraphs 47-54.

Where an assessment indicates that a development would have an unacceptable safety impact or the residual cumulative impacts on the SRN would be severe, the developer must identify when, in relation to the occupation of the development, transport improvements become necessary.

Existing Traffic Data

In the event it is necessary to undertake assessment of the A20 / A260 interchange, existing traffic flows and queue data will be required to be provided.

Collision Analysis

In the event it is necessary to undertake capacity assessment of the A20 / A260 interchange, a detailed STATS 19 collision analysis data will need to be undertaken covering the five years pre-pandemic, as well as the pandemic period.

Trip Rates and Trip Generation

The applicant has used TRICS to provide trip rate forecasts for the residential component of the development. The site selection criteria have been reviewed and found to be acceptable.

The residential vehicle trip generation has been calculated based on 53 dwellings. It is seen that there are forecast to be 24 vehicle trips during the AM peak and 25 vehicle trips during the PM peak.

Table 5.1 – Predicted Weekday Peak Hour Trips for Proposed Site of 53 dwellings

Transport Mode	AM Peak Hour (08:00-09:00)			PM Peak Hour (17:00-18:00)		
	In	Out	Total	In	Out	Total
Vehicles	7	17	24	17	8	25
Cyclists	0	1	1	0	0	0
Pedestrians	3	7	9	2	1	4
Public Transport Users	0	1	1	1	0	0
Total People	11	35	46	24	11	36

The trip rates associated with the convenience foodstore have also been forecast by the applicant using TRICS database. The site selection criteria have been reviewed and found to be acceptable.

The vehicle trip generation has been calculated based on the 400 sqm convenience foodstore. It is seen that there are forecast to be 73 vehicle trips during the AM peak and 82 vehicle trips during the PM peak.

Table 5.2 – Predicted Weekday Peak Hour Vehicle Movements for a Proposed 400sqm Food Store

Transport Mode	AM Peak Hour (08:00-09:00)			PM Peak Hour (17:00-18:00)		
	In	Out	Total	In	Out	Total
Vehicles	36	37	73	40	42	82

The proposed trip rates are not compliant with DfT Circular 01/2022. There is a need to present the vision for the site, identify the measures required to achieve the vision and to then identify the impact which those measures will have on the vehicle trip rates, as documented above.

Trip Distribution/Assignment

The residential trip distribution/assignment has been based on 2011 Census 'Journey to Work' dataset for Middle-layer Super Output Area (MSOA) Shepway 002.

The convenience foodstore trips are noted to be 'mainly by linked trips or by-pass trips and not new trips'. We agree that we would not expect primary trips associated with the 400 sqm convenience store to be travelling on the SRN.

We acknowledge that the distribution/assignment analysis is currently extended to the SRN, this should be reviewed considering the above comments related to the vision and trip rates.

Assessment Scenarios

The TA contains assessment at the 2028. In the event that SRN junction assessment is required, this should be in accordance with the requirements of DfT Circular 01/2022.

Committed Development

We acknowledge that the TS includes two committed development sites which have been agreed with KCC Highways:

- Land off Aerodrome Road (Monks Farm) 110 dwellings – planning reference 21/2552/FH
- Otterpool Park Garden Village – planning reference 19/00257/FH

In the event there is a need for assessment of the SRN, we will require confirmation from the LPA with regard to the committed development assumptions.

Background Traffic Growth

The background traffic growth within the TA has been undertaken using TEMPro. The presented rates between 2023 and 2028 have been reviewed and concluded to be acceptable. In the event assessment is required of the SRN, any committed developments which are considered should be removed using TEMPro 'alternative assumptions'. This approach applies if the committed developments are contained within the adopted Local Plan and are also located within MSOA Shepway 002.

Junction Assessment

We require to see the finalised trip generation and trip assignment, in line with DfT Circular 01/2022, prior to finalising any SRN junction assessment requirements.

In the event that SRN junction assessment is required, the models will require to be calibrated and validated using queue data.

Construction Management Plan

Given the location of the application site and the degree of existing traffic congestion, at the appropriate stage of the planning process we are minded to recommend the following planning condition:

‘Condition: Prior to the commencement of the development hereby permitted a Construction Management Plan shall be submitted to and approved in writing by the Local Planning Authority (in consultation with the Highway Authority for the A20. The plan shall include as a minimum:

- Construction phasing
- Construction routing plans
- Permitted construction traffic arrival and departure times

Thereafter all construction activity in respect of the development shall be undertaken in full accordance with such approved details unless otherwise approved in writing by the Local Planning Authority in consultation with the Highways Authority.

Reason: To mitigate any adverse impact from the development on the A20 in accordance with DfT Circular 01/2022’.

The above represents our *initial* requirements. As the analysis progresses, it is possible that further requirements may emerge.

Conclusion

Given the above, it is currently not possible to determine whether the application would have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN (the tests set out in DfT Circular 01/2022 and DLUHC NPPF December 2023 [particularly paras 114 to 117]). This response details the steps that need to be taken in order to resolve this issue.

In light of the above, National Highways currently recommends that planning permission not be granted (other than a refusal if the Council so wishes) for a period of three months from the date of this response to allow the applicant to resolve the outstanding matters.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 74 and 109 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 108 and 114 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

Appendix 2 – Weekday AM & PM Development Flow Diagrams (from App 10 of TA)

DIAGRAM A: SPITFIRE WAY RESI DEVELOPMENT FLOWS. WEEKDAY AM PEAK HOUR

KEY
TOTAL MOTOR VEHICLES (in PCUs)

Note: Rounding errors may occur

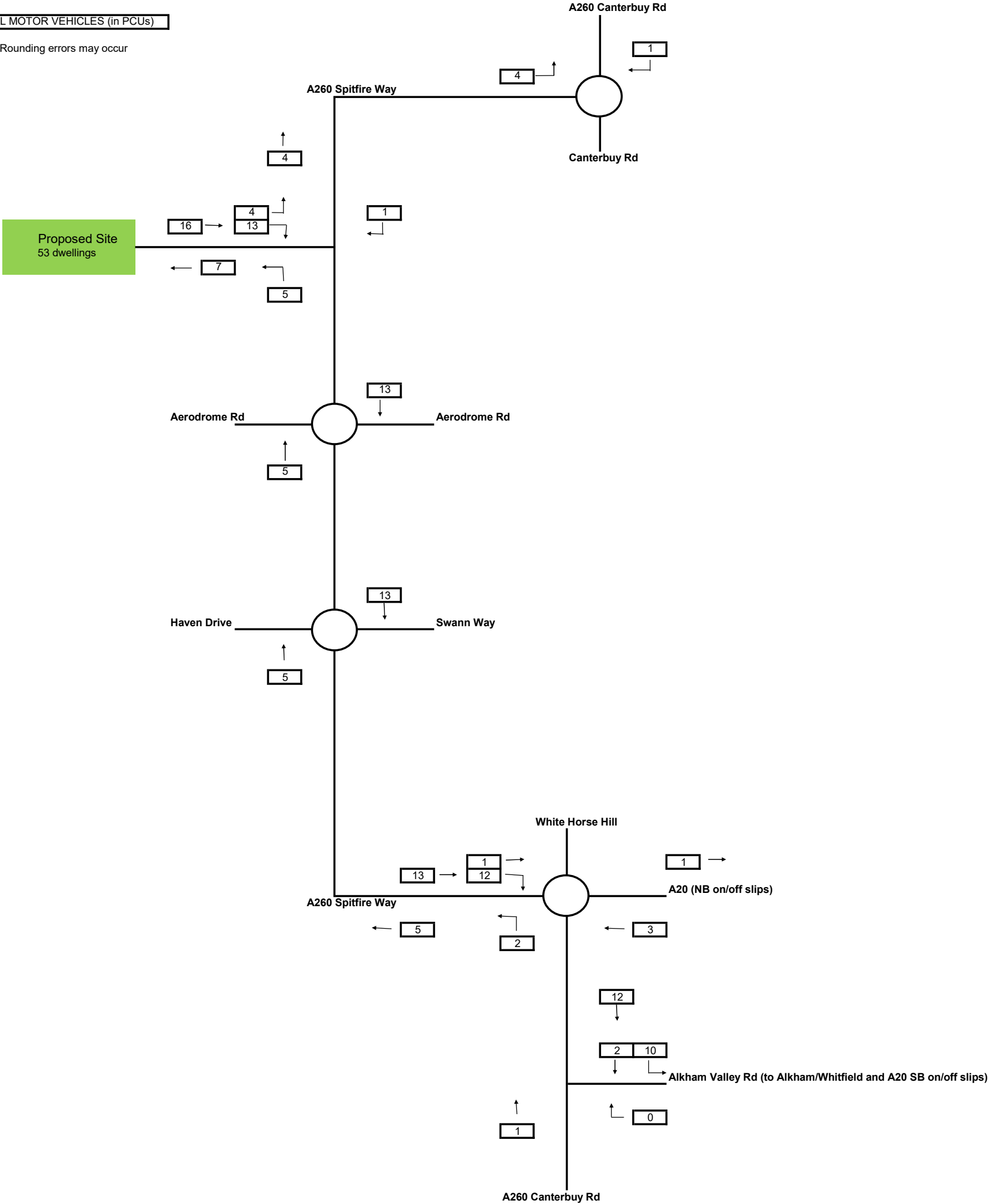
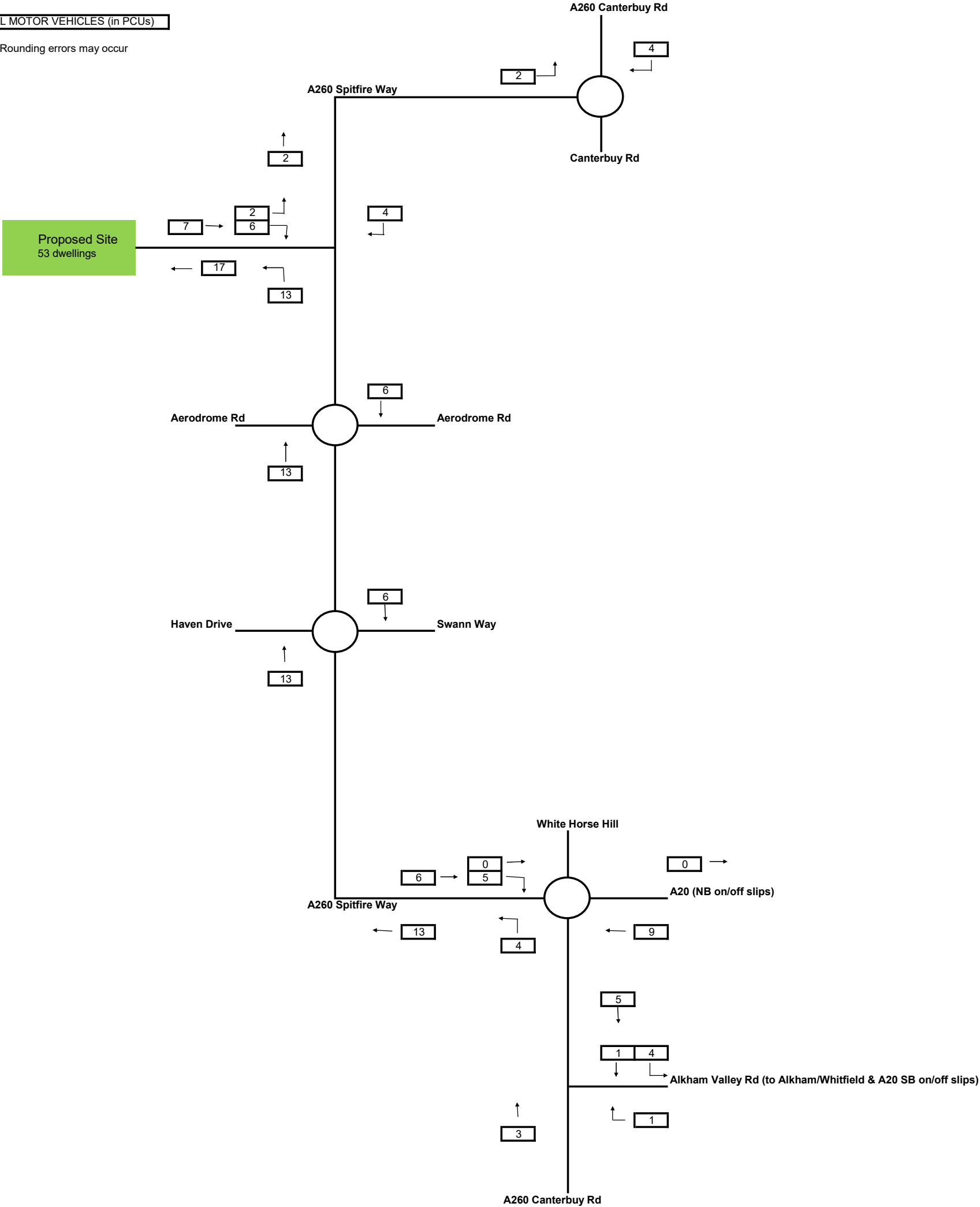


DIAGRAM B: SPITFIRE WAY RESI DEVELOPMENT FLOWS, WEEKDAY PM PEAK HOUR

KEY
TOTAL MOTOR VEHICLES (in PCUs)

Note: Rounding errors may occur



Appendix 3 – Weekday AM & PM Development Flow Diagrams with Travel Plan Reduction

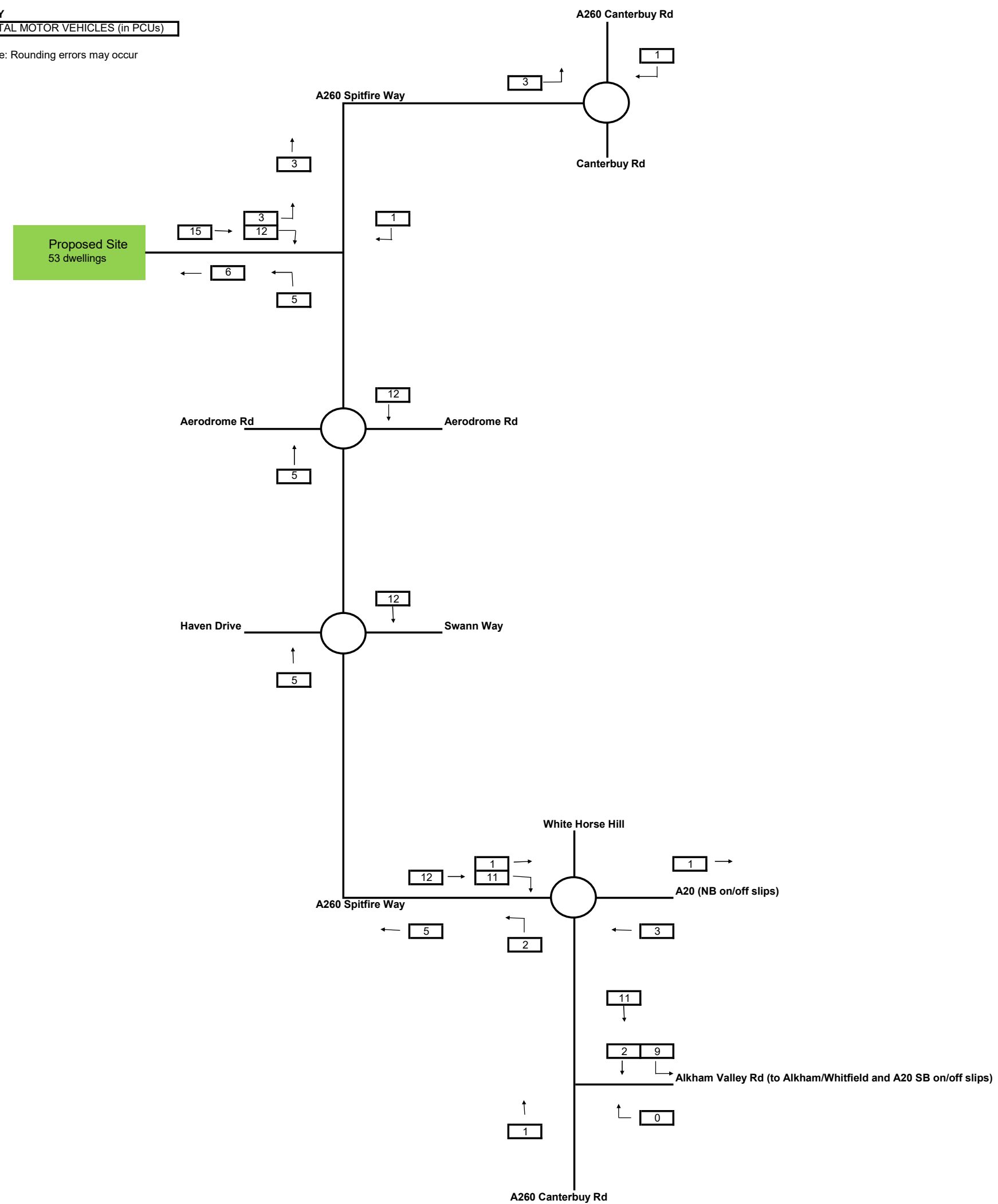
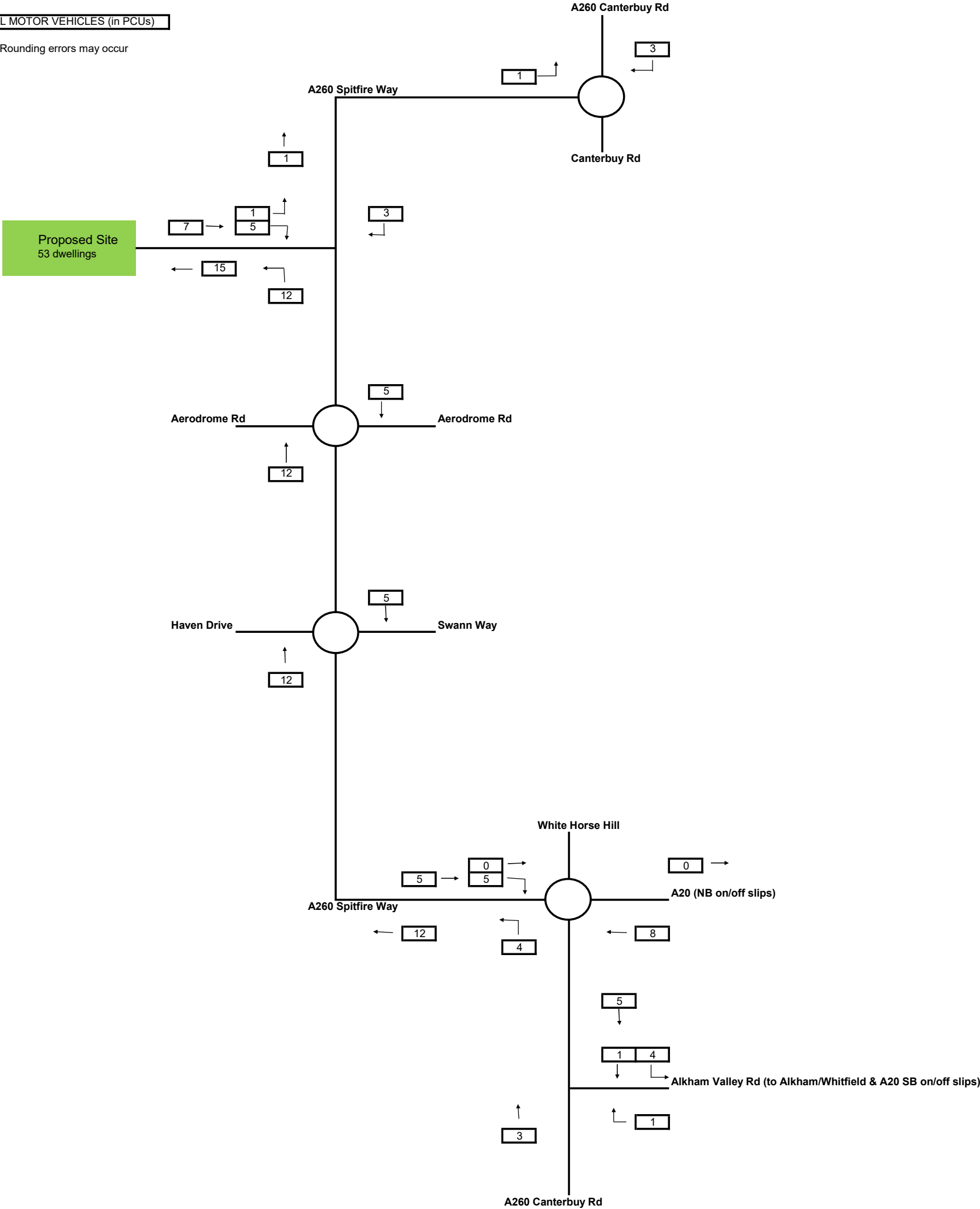


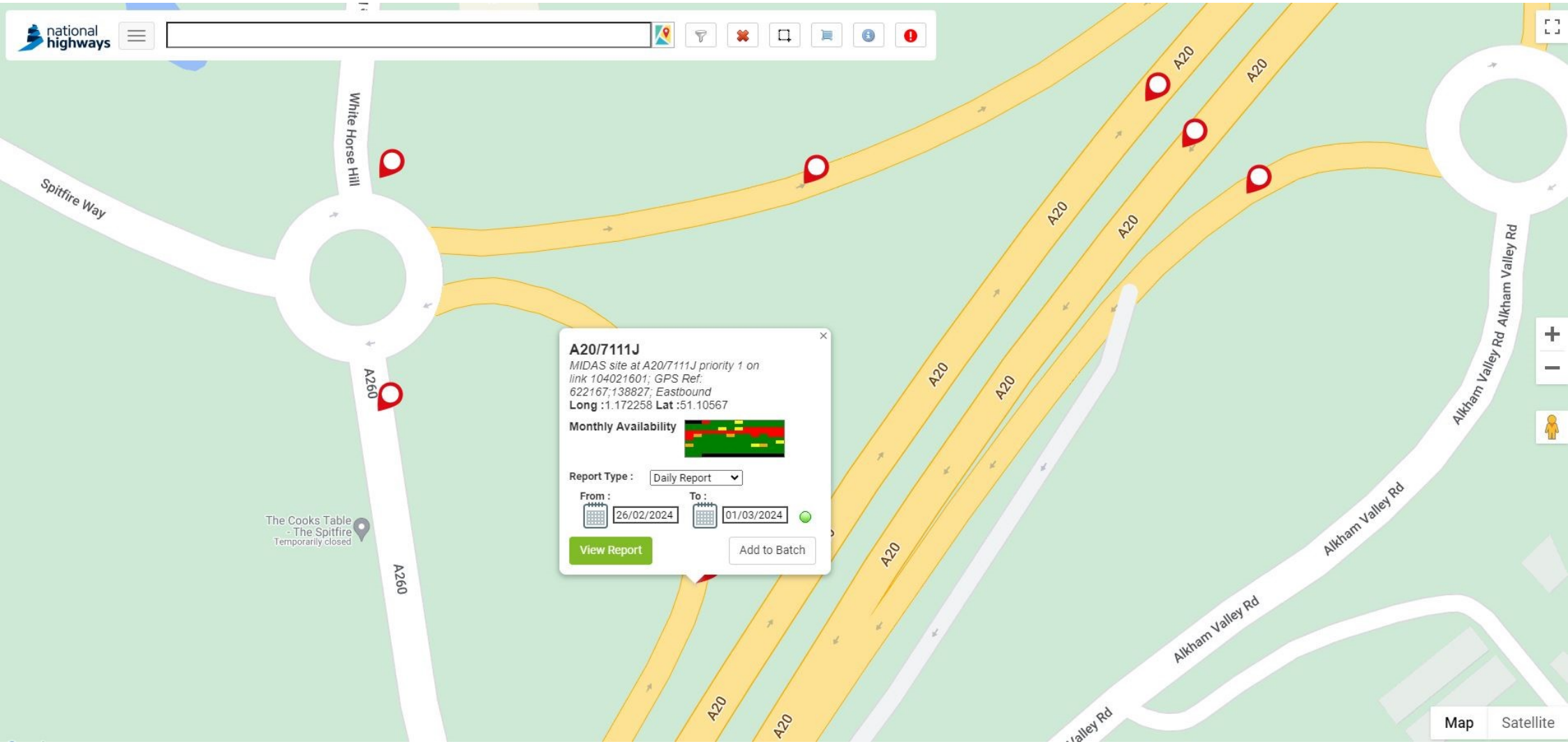
DIAGRAM B: SPITFIRE WAY RESI DEVELOPMENT FLOWS, WEEKDAY PM PEAK HOUR - 10% REDUCTION BY TRAVEL PLAN

KEY
TOTAL MOTOR VEHICLES (in PCUs)

Note: Rounding errors may occur



Appendix 4 – WEBTRIS data for A20 northbound exit slip



A20/7111J

MIDAS site at A20/7111J priority 1 on link 104021601; GPS Ref: 622167;138827; Eastbound

Long :1.172258 Lat :51.10567

Monthly Availability

Report Type :

Daily Report

From :

26/02/2024

To :

01/03/2024

View Report

Add to Batch

Please note this is a preview of the selected report. Click on the "Download Full Report" button to download the full report as a CSV file

[Download Full Report](#)

Daily report between 26/02/2024 and 01/03/2024

For site: A20/7111J

MIDAS site at A20/7111J priority 1 on link 104021601; GPS Ref: 622167;138827; Eastbound

[Standard Report](#)[Hourly Tabular Report](#)[15 Minute Tabular Report](#)

Report Date	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	Total
Mon 26 Feb 2024	29	28	15	24	15	66	229	466	405	404	367	423	446	463	518	661	798	897	553	320	222	183	134	85	7751
Tue 27 Feb 2024	46	27	22	13	30	65	244	535	452	489	470	224	278	517	628	787	888	960	633	389	252	218	175	81	8423
Wed 28 Feb 2024	34	33	13	22	32	80	259	500	497	489	448	464	542	575	629	761	913	889	559	180	128	193	151	63	8454
Thu 29 Feb 2024	28	13	17	21	35	70	253	462	469	483	446	442	546	540	576	684	893	913	539	376	264	225	162	81	8538

Please note this is a preview of the selected report. Click on the "Download Full Report" button to download the full report as a CSV file

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