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**Highways and Transportation**

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**Tel:** 03000 418181

**Date:** 2 June 2023

**Our Ref:** FW

**Application - CA/23/00484**

**Location - Land At The Hill, Bekesbourne Lane, East Of Bekesbourne Hill, Bekesbourne, Canterbury, CT4 5EA**

**Proposal - Outline planning application for up to 300 residential dwellings (including affordable housing and older person accommodation), a new community hub, introduction of structural planting and landscaping, informal public open space and children's play area and surface water flood mitigation and attenuation. All matters reserved except for access.**

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters :-

This site is allocated as Site R15 in Canterbury's Draft Local Plan. In addition this site has been subject to pre-planning application advice with Kent County Council Highways and Transportation.

This is an outline application to consider access only for 300 dwellings, plus 30 older person accommodation and community/retail use area. All other matters will be considered as part of further Reserved Matters applications, should the LPA be minded to approve this application.

This site is located to the the south of the A257 The Hill, which makes up part of Kent County Councils Strategic Road Network. A new priority T-junction is proposed into the site from the A257, this road will lead through the site and connect to a new access to be created onto Bekesbourne Lane.

A Transport Assessment has been submitted, and having reviewed this a number of points require additional information or further clarification, detailed as follows:

Point 2.4.10 The Draft Local Plan details a number of points regarding access and transportation that should be investigated by this site, especially in relation to 'safe and convenient pedestrian and cycling connectivity'. I do not feel all the points raised here have been addressed by the applicant and further details should be submitted to demonstrate the applicant has reviewed and investigated all the areas detailed.

### Access

An indicative site plan has been submitted which shows the positions of the two proposed new accesses. Detailed drawings for both the new accesses have also been submitted, however no

plans have been submitted demonstrating swept path movements for a 11.4m long refuse vehicle entering or exiting both of the proposed accesses (Although drawing ITM16283-GA-004 Rev A is mentioned in the Road Safety Audit). In addition at pre-planning application stage there was mention of buses entering the site. If this is still the intention, then tracking for a 12.2m long bus will also be required for the main site access onto The Hill.

A Road Safety Audit has been conducted on both accesses. However until plans demonstrating the swept paths have been submitted, the findings cannot be verified.

The applicant proposes to extend the 30mph speed limit on Bekesbourne Lane. Whilst we have no objection to this, it would need to be backed up by valid data to demonstrate that reducing the speed limit is appropriate. An 7 day ATC survey conducted at the point of the proposed new access would be able to provide evidence of actual driven speeds at this location. It may require additional measures to reinforce any reduction in speed limit.

### Sustainability

The applicant has demonstrated on the indicative master plan that there will be pedestrian links from the site to the existing pedestrian network on the A257. An informal pedestrian crossing is proposed to the east of the new access, which will link a footway from within the site to the existing footway on the northern side of the A257.

However we have concerns that during peak hour travel times it will be difficult for pedestrians to use this. Point 4.3.8 states that the existing traffic flow survey demonstrates there are c750-950 two way vehicle trips on the A257 in the peak hours. This equates to one vehicle every 4 seconds, which is not an acceptable amount of time to enable pedestrians to safely cross the road. The applicant should investigate alternate means of providing a safe pedestrian crossing on the A257.

A pedestrian footway is proposed within the site, bordering the site frontage along Bekesbourne Lane. At the northern end, the footway will exit immediately onto the carriageway, just south of PROW CB156. We accept there is a lack of highway land to provide a direct footway link from the site to this PROW, however we feel the exit point could be located closer to the PROW.

At the southern end, again the footway will exit onto the carriageway. On making a site visit I noted a staff member from Howletts Zoo having to walk in the road to access the Zoo. It would also be safe to assume that those visitors who use the bus route on the A257 to visit the Zoo would have to walk in the carriageway. It would be beneficial if the southern end of the footway could link directly to the main entrance to Howletts Zoo, via an off-road link on Howletts Zoo land fronting onto Bekesbourne lane, or whether a pedestrian link can be provided directly into the Zoo car park from this site. We would ask the applicant to make contact with the Zoo and investigate either of these possibilities, which would provide a safer means of pedestrian access.

Shared cycle and pedestrian footways within the site would be required to be 3m in width. Whilst the applicant has stated in point 4.3.10 that the site is located in the catchment area of the majority of local facilities for cyclists, they have not proposed any enhancements to improve cycle connectivity from the site to the local area. In particular Bekesbourne Station is located 2km from the site, however access to this at present would be along Bekesbourne Lane. The applicant should investigate whether any improvements can be made to existing off road links to the station that would encourage residents to cycle to here.

There are existing bus stops on The Hill, and the applicant is proposing to provide a footway link within the site frontage bordering the A257, to enable new and existing residents to reach the westbound bus stop.

Bekesbourne Station is the nearest rail station, though this is located approximately 2km from the site. There is limited parking at this site, and no cycle storage facilities. To encourage the use of bicycles the applicant should investigate with Network Rail the possibility of providing appropriate cycle storage here.

### Existing Highway Network

Manual counts were conducted by the applicant on a number of junctions on the highway network within the surrounding area of the site, to assess the existing traffic flows. However, the manual count data is limited to one day only, which does not take into account any traffic anomalies that may have occurred on that day. As such more robust data is required, and a 7 day ATC survey may be more appropriate in certain locations. If an ATC was carried out on the A257 and Bekesbourne Lane at the location of both of the proposed new accesses, the data may validate the manual turning count figures that have been submitted.

6.2.8 The applicant has based all future development traffic flow on the end of the Draft Local Plan, however we would also expect to see traffic flows demonstrated for application year + 5 years. This will provide a sensitivity test against the 2045 projected data.

6.3.6 States The Hill application ref 19/01665, however this was a discharge of conditions, the outline application was in fact 15/01711. No figures from Appendix J within the TA for that application have been detailed, so they can be verified. In addition, on the relevant flow diagram in Appendix 6D, the access for this site is not shown.

We do accept the reasons for not including the following sites in the impact assessments on the A257: Canterbury Riverside (17/02092), Hoplands Farm (16/00404), Former Chislet Colliery (16/00673), Sturry (17/01383), Broad Oak (18/00868).

Howe Barracks - the figures quoted in Table 6.1 do not appear to correspond with figures used in the flow diagram for this site within appendix 6D.

South Canterbury Site - the figures quoted in Table 6.2 do not appear to correspond to figures in the flow diagram - further clarification is required.

However the flow diagrams have not been fully assessed as we require further verification of the manual count figures. In addition the capacity assessment for Buffs Road/A257 junction has not been fully assessed, dependant on verification of manual count figures.

I would also point out that on the relevant flow diagrams for the site itself, the site accesses have not been demonstrated

6.4.9 The traffic flow diagram for the re-assigned traffic flows (Appendix 6F) does not show the proposed route through the site, with the associated flows demonstrated.

Appendix 7B - Picady 10 junctions assessment - we would normally expect to see a diagram of the proposed junction included, visually confirming the arms stated. An annotated drawing would also be expected demonstrating the geometry of the junctions.

### Trip Generation

TRICS has been interrogated to determine the trip rates for the proposed site. The figures presented were agreed in pre-planning application advice. Whilst the presented data is from 2022, I have interrogated TRICS myself using the more recent 7.10.1 version, and the figures are comparable.

Each of the three land class uses have been presented in separate tables, however an overall table combining all of the trip rates should be presented for clarity

### Travel Plan

This is being assessed by our Travel Plan Co-Ordinator and comments will be provided in due course.

### Contributions

The site will be expected to provide contributions towards the Local Infrastructure Delivery Plan, and these will be advised on in due course.

I look forward to further information being submitted to assist me in determining this application from a highway perspective.

Yours Faithfully

**Director of Highways & Transportation**

\*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.