

Newtown Railway Works, Ashford, Kent

Planning Application Reference PA/2026/0171 and PA/2026/0229



**Desktop Assessment and Supporting Submission
for South Willesborough & Newtown Community Council**

April 2026

1 TERMS OF REFERENCE

Aprica Ltd has been commissioned by South Willesborough and Newtown Community Council (SWAN) to comment on planning applications PA/2026/0171 and PA/2026/0229 for *'Redevelopment of the site [Newtown Railway Works] for a mixed use development comprising: Change of use, upward extension and external alterations to the Locomotive Shed building to provide 412 residential dwellings and commercial floorspace (577m²) (Use Class E); Change of use, upward extension and external alterations to the Engine Shed building to provide 20 residential dwellings and commercial floorspace (724m²) (Use Class E); Erection of four new buildings providing 383 residential dwellings, internal parking spaces and commercial floorspace (64m²) (Use Class E); Change of use of the Paint Shop building to provide commercial floorspace (108m²) (Use Class E); Change of use of the Acetylene Store (55m²) and Clock Tower (70m²) buildings to provide commercial floorspace (Use Class E) and/or community floorspace (Use Class F2), plus associated infrastructure, landscaping, parking, servicing, access and other associated works'* at Newtown Railway Works, Newtown Road, Ashford, TN24 0PN.

It should be noted that an extant (still valid) planning permission exists for a 2019/2020 film studio, hotel/restaurant and residential development. This is by virtue of some enabling works having been carried out. Weight might, therefore, be given to this when Planning Officers consider the current application.

Ian Taylor has produced this Transport Statement on behalf of Aprica Ltd. Ian is an Incorporated Engineer and a Member of the Institution of Civil Engineers (I.Eng MICE) with thirty-five years' experience of public and private sector highway infrastructure disciplines including transportation planning, RoSPA trained accident investigation & prevention, traffic management, road safety audits, traffic regulations, and highway design & construction. Ian has led on numerous major highway schemes for Local Authorities and has presented at Planning Committees, Council meetings, Chambers of Trade and Commerce, Emergency Services Operations Centres, Round Table and Lions, and public meetings and drop-in events. Ian has also represented clients at Public Inquiry.

2 INTRODUCTION & EXECUTIVE SUMMARY

Introduction

This report considers the scheme as currently proposed, with a view to providing grounds for objection, seeking refusal, mitigation or improvements on the local highway network should the development go ahead.

To provide clarity, this report is separated into the following parts:

1. Terms of Reference
2. Introduction and Executive Summary
3. Review of Current Status and Overall Highway Proposals
4. Review of Proposed Access & Egress Arrangements
5. Sustainability
6. Collisions and Road Safety
7. Conclusions and Recommendations
8. Appendices

EXECUTIVE SUMMARY

This Transport Statement assesses planning applications PA/2026/0171 and PA/2026/0229 for the redevelopment of the Newtown Railway Works site. Based on a detailed review of the Transport Assessment (TA), available drawings, stakeholder comments and the conditions of the extant consent, the current application is considered fundamentally non-compliant with local and national transport policy and does not demonstrate that the development can operate safely or sustainably.

- Both Kent County Council (KCC) and Active Travel England (ATE) have issued formal objections, citing an unacceptable impact on highway safety, lack of evidence, and inadequate provision for sustainable travel.
- There is a severe under-provision of parking. The proposed parking ratio of 0.69 spaces per unit (563 for residents and just 19 non-residential – it is not clear what is meant by non-residential) is significantly below both the national average and local car-ownership levels. The development could result in an overspill of over 500 vehicles into neighbouring streets.
- The Transport Assessment (TA) is not fit for purpose. KCC confirms this, citing “*significant deficiencies*” within the TA. There is a high chance of an unacceptable impact on highway safety, which is contrary to NPPF requirements.
- Walking and Cycling provision is insufficient and fails policy tests. Footways along Newtown Road and Crowbridge Road are narrow, discontinuous, obstructed or absent, with no continuous, safe route to the site. Cycling conditions are unattractive and hazardous, with some proposals making conditions worse. Active Travel England concludes that ‘*the applicant has not demonstrated sufficient infrastructure prioritisation, relies on outdated approaches, and fails to provide safe or direct walking and cycling routes*’.
- Bus services and infrastructure are poor. The only bus serving the area is an hourly daytime service with no Sunday operation, and the developer proposes no meaningful improvements. Bus stops lack tactile paving, raised kerbs and shelters.
- Access arrangements create highway safety risks, being likely to increase congestion and delays. Pedestrian and cycle access is sub-standard. These issues represent a failure to demonstrate safe access for all users, as required by NPPF.
- 21 injury collisions (including 1 serious) have occurred on Newtown Road in the latest 5-year dataset. The application does not provide demonstrably safe highway design.
- The Travel Plan is unrealistic. KCC confirms that it is “*promotional rather than enforceable*”. Claims of low car use and increased sustainable travel cannot be relied upon.

Based on Aprica’s assessment and the formal responses from statutory consultees, the current proposals should be refused. Any revised submission would need to demonstrate: A realistic parking strategy aligned with local ownership levels; Safe, direct and policy-compliant walking and cycling routes; Improved bus infrastructure and service enhancements; Access arrangements that demonstrably reduce congestion and safety risks; A robust, enforceable Travel Plan with measurable targets; Wider-area connectivity improvements, not localised measures only.

Until such evidence is provided, the application cannot be considered to be compliant with the NPPF, the Ashford Local Plan, or KCC Highways’ requirements.

3 CURRENT STATUS & OVERALL HIGHWAY PROPOSALS

For the two applications in excess of 900 documents are lodged on the Portal. There are no highway proposal drawings on the Portal and this report focuses on Drawing Numbers 'Q145-MA-XX-XX-DR-C-02000, 02001, 02002 and 02003. from an earlier extant application, which are being used for the basis of public and consultee comments on the current application. These drawings show the various access proposals, rather than there being the usual overall 'General Arrangement' drawing for highway works. The report also considers documents such as the Environmental Assessment (ES) - Transport and Access, Transport Assessment (TA), Design & Access Statement (DA) and Ashford Local Plan 2030. Aprica does not have the software (normally 'TRICS') or expertise to analyse the TA's trip calculations in detail and so cannot refute the assertions made for trip generation and distribution. It should be noted, however, that in practice trip numbers (especially for private vehicles) are very often higher than those suggested in TA's. Software can easily be used to manipulate and adjust modelled outcomes, whereas in real-world circumstances, people's behaviour and choices dictate what actually happens.

As mentioned above, there is an extant (still valid) planning consent for the site, which despite the significant difference in intended use (film, hotel and housing vs mostly housing with some commercial space) will probably carry weight in the consideration of the current proposals.

In addition to the above-mentioned documents, issued with the planning application, Aprica has reviewed comments from a number of stakeholders, including Kent County Council (KCC) and Active Travel England (ATE) along with public comments on the Planning Portal. Most of these are discussed in the Sustainability section but of significant note is Kent County Council's response below.

Kent County Council (KCC)

KCC Highways state that they are "*unable to support the application in its current form due to significant deficiencies in the submitted TA [Transport Assessment]. These deficiencies mean that I [they - KCC] cannot conclude that the proposal would avoid an unacceptable impact on highway safety on the highway network, as required by NPPF Paragraph 116.*" **KCC recommends refusal.**

As will be recommended in the 'Conclusions and Recommendations' section, in line with KCC's comments it is also Aprica's view that the application should, as it stands, be refused.

Of strong concern is the proposed suggested parking provision of just 0.69 spaces per unit. With current National car ownership levels of over 1.2 per dwelling and rising, even taking into account possible increases in more sustainable travel, and the probable lower figure for people living in apartments, there would have to be a vast downward shift in car ownership for anywhere near 0.69 to be achievable. It is Aprica's view that this is virtually impossible in the short and medium term, and most unlikely even in the longer term. It is also of significant note that the earlier planning application for film/hotel/housing assigned a figure of 1.2 spaces per unit, in line with the known actual averages. Any figure below 1.0 is only acceptable in planning terms, or indeed realistic, in car-free developments such as London or other big city centre settings, where residents and visitors have 24/7 access to frequent buses and trains.

In simple mathematical terms, the 815 dwellings and commercial units, being likely given the National and published local averages (over 1.4 in the ONS 2021 Census) to generate somewhere

close to 1.2 spaces per unit including visitors, plus 'commercial' parking as described below, is likely to create a need for over 1000 vehicles to be accommodated in the proposed 563 spaces, resulting in the 'overspill' of over 500 vehicles into the surrounding area. The TA itself, on page 31 just before on page 32 where the 563 residential parking spaces are proposed (with just 19 non-residential spaces and visitor parking to be agreed), shows KCC's Parking Policy figures of "1 space per residential unit and 0.2 visitor spaces". It goes on to state that Ashford Borough Council's Policy (ABC) is "TRA3(a) advises that suburban areas should have a minimum parking provision of 1 space per 1 bed dwelling whilst 2 and 3 bed dwellings should have a minimum parking provision of 2 spaces".

In terms of 'commercial' parking, ABC's Policy recommends 1 space per 30 to 50 m2 depending on use (café, office etc). Over 1600 m2 of commercial space is proposed. The TA states that "non-residential use will be flexible but will cover Use Class E". For Class E use ABC recommends 1 space per m2 between a range of 20% and 50% depending on use (20% for retail/café, 25% for gym, and 30 to 60% for office space). Averaging these out to, say, 30% (although the guidance is for 'worst case scenario' to be used) the 1600 m2 of commercial space could require over 50 parking spaces. Worst case would be around 80. In addition, 'servicing space' would be required for deliveries, recycling skips, waste disposal etc.

The TA is therefore greatly at odds with KCC and ABC's parking standards, and it is Aprica's view that the figure of 0.69 spaces per unit is woefully inadequate and in practice the number is likely to be almost double that figure. On this basis the application should be refused, at least pending a more robust and realistic case to address the significant lack of proposed parking spaces for the number of proposed units. Conversely the proposal is for 1000 cycle spaces on the application site. This seems much too high a ratio. At the nearby Ashford Railway Station, for example, there are less than half this amount. Arguably the figure of 1000 is intended to be 'sensational' and appears to over-play the possibility of people cycling to and from the site, the approaches being so poor. Parking Policy guidance would suggest that around half this amount is appropriate, adding to the argument that the figure is misleadingly optimistic and misleading.

4 PROPOSED ACCESS AND EGRESS ARRANGEMENTS TO THE DEVELOPMENT

The proposed accesses are very much in line with the proposals put forward for the extant application and permission for the proposed film/hotel/housing. Indeed the earlier proposals are those being used for this current application. The intended use of the site is now completely different to that of the earlier application and, therefore, the new proposals and associated likely significantly higher traffic movements need to be fully considered before any planning decisions are made. Whilst KCC suggests that its assessment of the trip generation and distribution '*would not have a severe impact on the local highway network*', KCC does have concerns about vehicle numbers and parking. Real-world experience shows that developments very often have a much bigger impact than is suggested by modelling, particularly where traffic and parking is concerned. This can be for a number of reasons, such as optimistic TRICS figures being used, the regular failure of Travel Plans, lack of desired modal shift towards more sustainable travel, and the continued growth in car ownership Nationally.

Clocktower Junction

This junction is proposed to be signalised (condition 28 of the extant planning permission). Whilst existing nearby and more distant junctions and signals are proposed to be monitored and if necessary amended, there is little doubt that the likely traffic accessing and egressing Clocktower will cause delays, congestion and possible air & noise pollution on Newtown Road. It should be borne in mind that the modelled 'vehicular' traffic figures using the development could, as mentioned above, be almost double in practice. Congestion at the signals could lead to drivers seeking alternative access and egress via accesses such as the proposed nearby priority 'give way' junction and this also needs to be factored into the overall impact on the highway network

A pedestrian crossing is incorporated into the proposals, on the south-eastern arm. Those walking from the north-west (Avenue Jacques Faucheux direction) are therefore expected to walk on the opposite (south-west) side of Newtown Road, go past the site entrance, cross at the signals, then walk back to the site on the other side of the road. In practice this is going to be unattractive and in cases unlikely to happen. Anti-pedestrian 'cobble' are present on the north-eastern 'verge' from the railway bridge to the development. There are no obvious plans to change this and physical site constraints would probably preclude such footway improvements. In summary this means one footway, on the opposite side to the development, for those walking to or from the Avenue Jacques Faucheux or the Railway Station direction. Coming from the opposite (south-eastern direction) there is also only one footway, on the south-west side, again on the opposite side to the development. This footway is particularly unattractive due to its relative narrowness and sporadic obstruction by street furniture such as bollards. Anyone 'encumbered' with a wheelchair, buggy/double buggy etc, would probably struggle to get past in some places. No measures seem to be proposed to address this issue.

No measures are proposed for cyclists. The approaches for cyclists coming from either direction along Newtown Road are very unattractive. The narrow carriageway generally all the way along Newtown Road, particularly under the railway bridge, with a poor road surface and some gradients, mean that only the most ardent of cyclists would be likely to be inclined to cycle to and from the development.

Bus use is discussed later in this report, under 'Sustainability'.



Newtown Road Approach from North-East Direction – Google



Newtown Road Approach from South-West Direction – Google



Newtown Road Approach Through Railway Bridge – Google

New Priority Give Way Access from Newtown Road

As mentioned above this access could become attractive should the Clocktower signals become congested. Drivers have a habit of ‘finding a way through’, despite efforts to control through-movement within a development. The internal arrangements would need to be physically robust and fully self-enforcing.

A simple give way arrangement, whilst technically giving priority to the main carriageway, could lead to issues should it become preferable, due to congestion, to the traffic signals. Driver courtesy, for example, where drivers on the main carriageway stop to allow vehicles in or out, can lead to significant tailbacks. One vehicle emerging from the minor arm can affect dozens on the main carriageway. Furthermore in the above scenario, at just 90 metres (not much more than ten queuing mixed vehicles – car, LGV, HGV) from the proposed traffic signals could easily lead to tailbacks through and beyond the proposed signals.

As for the proposed signals themselves, no improvement measures seem to be proposed for pedestrians or cyclists. Indeed there are no proposals for any footways at all and there is no existing footway on the north-east side of Newtown Road. It is impossible to identify how pedestrians would

be able to use this junction safely yet there do not appear to be any proposed measures to regulate its use by them.

Ellson Close

(Referred to as Ellson Way in drawings, and as Ellison Way in KCC's response)

A signalised pedestrian 'and cycle' crossing is proposed for this location (condition 30 of the extant planning permission). It is difficult to imagine, from the proposal drawings and the current highway layout, how cyclists would be able to use the crossing. The footways are not segregated, not even shared use, so cyclists would effectively become pedestrians pushing bicycles and then, only if coming out of Ellson Close and heading north-west, be able to re-mount.

This crossing's entire purpose seems to be for the relatively small number of local residents living around Ellson Close, to circumvent the lack of footway on the north-east side of Newtown Road. Those living closer to Samuel Peto Way could much more easily use the proposed new access off Samuel Peto Way itself. Arguably those living around Ellson Close could also use that access more conveniently.

On the face of it, although possibly beneficial in theory, this proposal seems to be quite disproportionate and perhaps unnecessary if alternatives could be considered.

Crowbridge Road Bridge

On Crowbridge Road there is a narrow hump-back bridge. It is understood that the planning application is subject to a structural and operational upgrade of the bridge, to include removal of the current 7.5 tonne restriction and strengthening to support more modern 40 tonne vehicles. An independent structural check would be carried out by KCC's Bridges Department.

There is a proposal to signalise (for formalised single-way shuttle working) the bridge and incorporate a new footway along Crowbridge Road. It is understood that there is a requirement to review this location under Policy SP6 of the Ashford Local Plan 2030, for quality design and permeability in use.

The carriageway over the bridge is narrow - single way working - and there are no footways, the footway on the north-eastern side terminating before the bridge. The proposal is for '*signalisation of the Crowbridge Road bridge and provision of new footway along Crowbridge Road*' (condition 27 of the extant planning permission).

The proposal is to extend the north-eastern footway over the bridge, reduce the carriageway width, and provide a signalised pedestrian crossing to connect with the existing footway on the opposite side near Gladstone Road. A one-way system (into Gladstone Road only) is proposed to prohibit exiting traffic and allow entering vehicles to clear the junction.

Whilst on the face of it this proposal is beneficial to pedestrians, there is little connectivity particularly for those on foot travelling north-westwards towards the application site. There is no footway on the south-west side beyond the bridge (in the direction of the site), and the footway on the north-east side is narrow and partially overgrown. Pedestrians heading north-west towards the site would

therefore have to cross from the south-western side footway to the new footway on the north-east, either at the existing controlled crossing near Samuel Peto Way or the proposed one at Ellson Close (or indeed 'uncontrolled' near the Old Mill Stream footpath where the south-western footway is better), then cross back across Newtown Road to enter the development. This is tortuous and highly un-pedestrian friendly, and seems to be a weak attempt to improve connectivity.

For any cyclists the proposal is disastrous. The design makes an already hazardous section of highway even more hazardous. There are no efforts to cater for cyclists, in fact it is actually proposed to prohibit cyclists from traveling south-eastwards on Crowbridge Road, forcing them onto Mead Road and back up Gladstone Road to rejoin Crowbridge Road by turning right across the two lanes of traffic. This is certain to deter cycling rather than encourage it, and should not be allowed. Cyclists, riding south-eastwards, would need to travel nearly 400 metres along residential streets with parked cars etc to negotiate, instead of 135 metres in a straight line. To all intents and purposes it is an anti-cycling measure.



Crowbridge Road Bridge, travelling South-Eastwards - Google



Crowbridge Road Bridge, travelling North-Westwards - Google

Access from Samuel Peto Way

Access is proposed, from the existing highway network, via Samuel Peto Way where it is then proposed to create 34 parking spaces within the development. The earlier planning application (film/hotel/housing) apparently did not show a need for this access, yet it is now proposed despite the claim that the current proposal requires a minimal number of spaces 'per unit'.

Current arrangements on Samuel Peto Way/Ellson Close and Harold Way are a mix of formal parallel and perpendicular parking, leaving the carriageway clear for traffic and occasional short-term parking for deliveries etc. There are already reports of long-term parking by non-residents seeking convenient free parking. Notwithstanding the significant (in terms of additional compared with existing) additional 'through traffic' accessing the development, it is highly likely that one of the first places to attract overspill parking would be Harold Way/Ellson Close and Samuel Peto Way, adversely changing the entire 'feel' of this relatively quiet residential area.

Policy SP7 of the Ashford Local Plan 2030 '*resists the coalescence of two or more separate settlements*' or '*erosion of a gap between settlements*'. Arguably the Samuel Peto Way/Harold Close/Ellson Close area, and the Alfred Road & Turner Close areas are settlements separated by Newtown Road, and therein lies a conundrum in that whether the proposed pedestrian crossings would coalesce the settlements, or indeed the additional traffic would erode the gap, in either case the development would come under the scope of Policy SP7.

Alternative Options

Detailed investigation into alternatives is beyond the scope of this Report but, an overarching and more acceptable idea based on known information, might be to reduce the scale of the development, aim for development that reflects the town's history and heritage, perhaps linked to Newtown Railway and the development of South Willesborough by early Engineers, to reflect the architecture and character of this railway town. Improvements could be made to the proposed Clocktower access (possibly using any money saved on abandoning or scaling down other highway proposals) to further enhance them for pedestrians and cyclists), use a more realistic figure for vehicles per unit, and abandon the proposals for the new priority give way junction, the signalised crossing at Ellson Close, and revise the proposals for the Crowbridge Road bridge to make them pedestrian and cycle friendly, and abandon the idea of the vehicular access off Samuel Peto Way (another potential money saving alternative). This would almost certainly be less impacting on traffic, arguably safer for road users, and more appealing to existing local residents, whilst still creating homes and employment.

Aprica feels that much more thought could go into the type and size of the development, and the associated highway proposals, to reduce the likely impact on the highway network.

5 SUSTAINABILITY

Sustainability is possibly the area of greatest concern with the current proposals, particularly in view of the Developer's ambitious claims about minimal car use and the associated low number of proposed parking spaces. The application severely lacks provision or evidence of sustainable measures that would help to reduce the need to travel by car.

Comments by stakeholders/consultees and in some cases the Developer's own agents have a common theme: that there is 'potential' for sustainable travel, but that the proposals fall short of demonstrating a real chance of achieving it. Comments on the Planning Portal already mention that parking is an issue locally and that additional pressure would be placed upon the already-struggling services and facilities, such as Doctor's surgery, and that pollution could increase.

Comments include:

- Active Travel England (ATE) '*ATE welcomes the development's location in a sustainable area but raises concerns about the adequacy of transport planning, particularly regarding prioritisation of sustainable modes; the applicant has not demonstrated sufficient infrastructure prioritisation or detailed assessments of off-site facilities; the trip generation analysis focuses mainly on vehicle traffic during peak hours, neglecting all-day trips by walking, cycling, and other modes, thus relying on outdated planning approaches; existing pedestrian, cycling, and public transport access is generally good [i.e. has potential], but the applicant has not provided qualitative audits of key links or detailed plans for improving infrastructure, especially along Newtown Road, which currently lacks compliant cycle infrastructure and safe crossings; the proposal includes improvements to junctions and access points, but lacks adequate provisions for cyclists and pedestrians at multiple access points, with concerns about connectivity, safety, and directness of routes*' and concludes that ... **"The applicant is advised to revise transport assessments, develop detailed infrastructure improvement plans, and work with authorities to secure necessary funding and contributions, ensuring the development maximizes sustainable travel opportunities and aligns with policy frameworks"**. This is quite critical, particularly for ATE.
- Kent County Council (KCC) has commented that there is '*lack of detail as to how the proposals are compliant with Local Transport Note 1/20, lack of commitment to upgrade the existing bus service, lacks Travel Plan enforceability, no modal share targets within the Travel Plan, there is no Cycling Assessment or Walking Audit (as required by Local Transport Note (LTN) 1/20, and concludes that "As submitted, the Transport Assessment does not provide a sufficiently robust evidence base for a development of this scale"*'.

This alone should be sufficient for Planning Officers to refuse the application as it stands. KCC also asks for '*a comprehensive controlled parking zone strategy*'. Whilst Controlled Parking Zones (CPZ's) can be effective in controlling all-day parking etc, they often adversely affect existing residents and can be quite 'clunky' if visitor permits etc are a requirement. They can also be costly to enforce if short period restrictions apply. Alternatives should be considered if possible.

- The Ashford Local plan 2030 includes requirements for '*safe access, parking strategies, and traffic management*' and '*promoting new pedestrian and cycle links*'. These are not demonstrated in the planning application and in some locations, such as the Crowbridge Road bridge, the opposite is considered to be the case. The Local Plan (Policy SP6) also requires developments to have '*ease of movement*'. Movement, at least by sustainable means, is not and would not be easy, and arguably wouldn't be particularly easy even by car.

- The Transport Assessment (TA) acknowledges the emphasis on sustainable travel and quotes the National Planning Policy Framework (NPPF), NPPG, DfT Circular 01/22, Kent's LTP5, Kent's Active Travel Strategy (ATE), the Ashford Local Plan (2019) and the then emerging Local Plan. It claims that '*the development will promote active and sustainable travel, with existing good connectivity to bus and rail services*' and that '*sustainable travel needs to be 'practical'*'. Whilst one argue that the TA 'promotes' sustainability, in reality for the reasons mentioned above in each category of sustainable travel, it is not the case. This view is stated in several other parties' responses.

It is Aprica's view that if sustainability is to be achieved, far more needs to be done to make walking, cycling and bus travel more accessible, attractive and safe. KCC and ATE have been particularly critical of the sustainability proposals.

Travel Plans

Travel Plans are notoriously ambitious and unenforceable, with incentives such as free bus passes, cycle vouchers, car clubs and bus company subsidies often having a very low uptake and then lapsing over time. Few, if any, instances of enforcement are known of. KCC describe the Travel Plan as '*promotional rather than enforceable*', a view shared by Aprica.

Air Quality

It is noted that the area is not currently an air quality management area (AQMA) but it is common knowledge that the World Health Organization (WHO) considers air pollution to be '*a major environmental health problem, causing millions of deaths and other health issues each year*'. This proposal, as it stands, is not sustainable and will undoubtedly add in some way to air pollution (from increased traffic to and from the development and possibly from the traffic coming from the M20 along Newtown Road to the Railway Station), with engine 'idling' at the proposed signals etc, creating high concentrations of fine particulates and nitrogen dioxide in very close proximity to some dwellings such as those with balconies fronting Newtown Road.

Hierarchy of Sustainable Travel Modes

There is a desirable National hierarchy of sustainable travel modes, which are addressed in order of preference below.

1. Walking

As described in detail above, the footways along the entire length of Newtown Road and Crowbridge Road are not continuous. In many places the footways are narrow, overgrown and obstructed by street furniture. Vulnerable road users would find it particularly difficult to safely negotiate some of the existing footways and there is very little in the proposals to improve this situation. On Newtown Road opposite Samuel Peto Way is a signalised crossing for pedestrians and cyclists, the only section of cycleway along the entire length. It is less than 150m long. The crossing gives access to an underpass to walk or cycle under the railway lines to Hunter Avenue. The street furniture at the crossing actually hinders those wishing to continue walking along Newtown Road. Pedestrians can

barely pass without getting hazardously close to the kerb edge, whilst anyone with a wheelchair etc would probably need to go on the carriageway. Interestingly a 'Google' drive along Newtown Road shows only two or three pedestrians and no cyclists whatsoever along the entire length between the Railway Station to beyond Samuel Peto Way. The weather looks to have been favourable on the day of the filming and this level of footfall is unusually low, perhaps due to the lack of connectivity, a matter which is not due to be sufficiently addressed in the planning proposals.



Newtown Road Approaching Underpass – Google



Pedestrian Approaching Newtown Road Underpass – Resident Photo

Near Mead Road/Albion Road there is a footpath which is intended for people on foot to use instead of walking on the grass verge (there is no footway) then crossing the narrow bridge which also has no footways. The path is not surfaced and not maintained, so is regularly too muddy to use and those with wheelchairs, buggies or mobility scooters find it impossible so have to travel in the carriageways. Another example of the severe lack of connectivity for sustainable travel.



Mead Road Bridge – Google



Mead Road Path – Resident Photo

2. Cycling

The proposal is for 1000 cycle spaces on the application site. This seems a highly ambitious number of spaces. At the nearby Ashford Railway Station, for example, there are less than half this amount. Arguably the figure of 1000 is intended to be ‘sensational’ and appears to over-play the possibility of people cycling to and from the site, the approaches being so poor. Parking Policy guidance would suggest that around half this amount is appropriate, adding to the argument that the figure is misleadingly optimistic. In many places along Newtown Road and Crowbridge Road cycling is unattractive and potentially hazardous. At the Crowbridge Road bridge the situation would be made worse by the proposed highway works. There is no cycle priority whatsoever in the proposals and little confidence that cycling will be improved elsewhere in the area.

As mentioned above, a Google drive-by does not show any cyclists on the entire length of Newtown Road or Crowbridge Road. This is not particularly surprising given the 'unfriendliness' of the roads for cyclists. The short section of shared use footway (now not desirable as segregated cycleways become the preferred measure) only serves the Underpass and riverside route to the Designer Outlet. It is not appropriate for users of the proposed development.

Local Transport Note 1/20 (LTN1/20) is the 'go-to' document, commissioned by the Department for Transport, providing National guidance on designing high-quality, inclusive cycling infrastructure to promote cycling as a key part of the transport system. Whilst its primary focus is on cycling, it operates on the principle that good cycle design should not come at the expense of pedestrians. It contains several critical design mandates for walking environments, the core philosophy of which is separation. LTN 1/20 moved the UK design away from shared use paths because they often create conflict and make walking feel unsafe, particularly for people with visual or mobility impairments. The existing and proposed arrangements for cyclists and pedestrians fall far short of the principles of LTN 1/20 and should be considered using LTN 1/20 as the primary guidance.

3. Bus Travel

It is understood (and confirmed by KCC) that since the previous proposals were granted planning permission, the bus service has been reduced from twice per hour to just hourly.

The nearest bus stop to the application site is near Alfred Road. At just over 100 metres from the site the bus stop falls within the Nationally recognised (Institution of Highways and Transportation (IHT)) acceptable distance of 'no more than 400 metres'. Not all the bus stops along Newtown Road and Crowbridge Road have bus box markings or raised 'boarder' kerbs. None have tactile paving and none have shelters. This is not user-friendly or in line with current good practice. As a minimum, raised boarder kerbs, tactile paving and bus box markings should be provided, and where possible (except for alighting only stops) shelters installed.

The only bus service on Newtown Road and Crowbridge Road is the 507. The service is hourly or less, daytime only and none on Sundays, which is hardly convenient for people to get to and from Ashford town centre or indeed the development site. There is a local desire for the Newtown Road and Crowbridge Road area to be better connected with the William Harvey Hospital. Currently people from the area have to walk the 300 metres or so to Twelve Acres then catch the service 503. Hospital connectivity could be investigated to make bus travel more appealing.

4. Rail Travel

Rail travel is a good sustainable possibility at this location, with the application site being so close to the Ashford Railway Station. Currently rail travellers can reach a number of towns and coastal areas within around 20 minutes, with London being only 40 minutes or so away. Upgrading the station to International status again, which seems a distinct possibility, would make rail travel even more attractive. The obstacle, however, is the journey from the application site area and surrounding area to the Station. It is very pedestrian and cycle unfriendly, and buses are few and far between, meaning that rail travellers would be more than likely to use cars or taxis to get to and from the Station.

5. Private Car

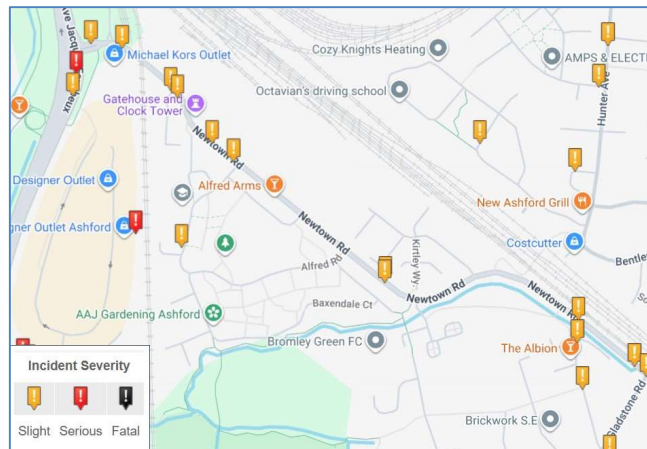
Conversely to the above-mentioned number of cycling spaces at the Railway Station (around 450 vs the application site's 1000), there are around 2400 car parking spaces vs the application site's 563. This is a huge disparity and suggests that either Network Rail have it wrong, or the Developer does.

In view of the lack of proposals for safe and attractive sustainable travel it is considered that the application, as it stands, should be refused.

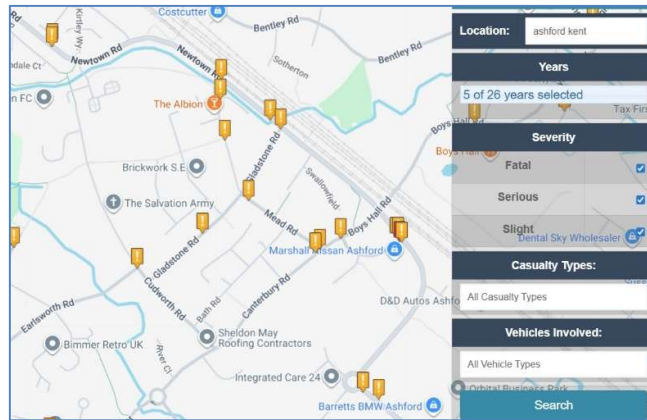
6 COLLISIONS AND ROAD SAFETY

'CrashMap' is a website that uses official government data (the STATS19 database) collected by police forces across the country, to allow users to see where, when, and (for a fee) how road traffic collisions (RTC's) are occurring in their local area.

Data for the most recent five-year period (the accepted period in the Highways profession) 2020-2024 inclusive, shows 21 collision injuries along Newtown Road, comprising 20 slight and 1 serious injury. This is reasonably high for an unclassified 'local' distributor road. It should be noted that although there is little published data on unreported collisions the Department for Transport (DfT) suggests that 'for every reported and recorded injury collision there could be as many as 5 unreported injury collisions and 20 damage-only collisions'. Near misses could be as many as 300 per recorded injury collision.



Collisions on Newtown Road. Source: CrashMap



Collisions on Crowbridge Road. Source: CrashMap

Road Safety Audits (RSA):

An RSA is a process for checking the road safety implications of proposed highway improvement schemes. The purpose of the RSA is to minimise the occurrence and severity of collisions once the scheme has been built and the road comes into use. The RSA is separated into 4 parts:

- Stage 1 - Completion of Preliminary Design – it is assumed that this has been completed
- Stage 2 - Completion of Detailed Design – it is not certain whether this has been completed but, if it has, it seems to have failed to address what appear to be some major flaws as mentioned above
- Stage 3 - Completion of Construction
- Stage 4 - Post Opening Monitoring 12 months after opening.

Whilst the RSA1 has probably now been completed there are, as mentioned, issues in the Proposed Highway Works drawings which need to be closely scrutinised. There is a great deal of scope for further improvement to the proposals.

7 CONCLUSIONS AND RECOMMENDATIONS

Conclusions

- **Kent County Council (KCC)** states that there is an “*unacceptable impact on highway safety on the highway network*”. This is a view shared by Aprica.

KCC requires ‘*a full and robust transport assessment*’ and states that ‘*they are unable to support the application in its current form due to significant deficiencies in the submitted TA; They cannot conclude that the proposal would avoid an unacceptable impact on highway safety on the highway network; the Transport Assessment does not currently demonstrate that the proposed development would avoid an unacceptable impact on highway safety given the significant parking shortfall; reliance on low car ownership is not evidence-based and current car ownership levels within the Newtown area are much higher than that suggested; The suggested provision is much lower than the previous planning permission on the site; The applicant needs to undertake a robust assessment compared to existing car ownership levels in the 2021 census; There is under-provision of on-site car parking with a high risk of overspill onto surrounding streets; No strategy for further parking restrictions on residential roads surrounding the site has been submitted; Detailed plans need to be submitted showing proposals for on-street parking restrictions (fundamental to make the development acceptable from a highways perspective). Lack of detail as to how the proposals are compliant with Local Transport Note 1/20 for the existing footways along Newtown Road; Lack of commitment to upgrade the existing bus service along Newtown Road; Travel Plan measures lack enforceability and require strengthening; There is no modal share targets submitted within the Travel Plan including targets for reduce private vehicle usage out of the site; As submitted, the Transport Assessment does not provide a sufficiently robust evidence base for a development of this scale; KCC H&T currently **objects** to the application’.*

Rarely does a Council’s Highways Team submit such a critical response and in many respects the response is refreshing to read. Aprica agrees with all KCC’s comments and echoes many of them.

- **Active Travel England** ‘*raises concerns about the adequacy of transport planning, particularly regarding prioritisation of sustainable modes*’ and states that ‘*the applicant has not demonstrated sufficient infrastructure prioritisation or detailed assessments of off-site facilities*’; ‘*relies on outdated planning approaches*’; ‘*Newtown Road currently lacks compliant cycle infrastructure and safe crossings*’; ‘*the proposal ... lacks adequate provisions for cyclists and pedestrians at multiple access points, with concerns about connectivity, safety, and directness of routes*’ and concludes that ... “*The applicant is advised to revise transport assessments, develop detailed infrastructure improvement plans, and work with authorities to secure necessary funding and contributions, ensuring the development maximizes sustainable travel opportunities and aligns with policy frameworks.* Aprica agrees with the ATE comments.
- The access proposals severely lack provision for pedestrians and cyclists, and in some cases are felt to increase vulnerability, particularly for cyclists.

- Existing walking and cycling facilities are poor, as is the one, limited, bus service. Pedestrians are not well catered for and the cycle facilities and bus stops are inadequate and nowhere close to current standards.
- Some of the highway works seem excessive even for the claimed benefits, and could have a significant adverse effect on congestion, pollution and the existing local residents' enjoyment of their locale.
- The suitability and effectiveness of the proposed highway works, the ratio of parking spaces to units, and indeed the acceptable number of units themselves should be re-considered. Alternatives should be explored with a view to improving road safety, connectivity and sustainability, whilst possibly value-engineering the proposals to better use available funds including Section 106 monies.
- A concerning number of recorded injury collisions have occurred in the most recently recorded five-year period. Bearing in mind the number, and likely unrecorded collisions, this is something that needs to be taken into consideration when deciding on the suitability of the highway measures proposed. The lack of similarity of the current application to the previously permitted, extant, application should also be considered.
- If sustainability is to be achieved, far more needs to be done to make walking, cycling and bus travel more accessible, attractive and safe.

For a development of this size, the application is weak and incomplete. There are numerous improvements that should be made to the proposed highway works, which make little or no effort to encourage genuine sustainable modes of travel or provide walking/cycling links to the application site.

The existing highway network is poor and outdated where pedestrians, cyclists and bus users are concerned. The application proposals need to be linked to improvements in the wider area if people are to be encouraged to walk, cycle or take the bus.

It is suggested that the RSA 1 (should it have been carried out) be reviewed or repeated whenever any revised, more detailed, application is made. The RSA2 (detailed design stage) should provide the technical confirmation that the proposals minimise the risk of occurrence and severity of collisions. The outcomes of the RSA should be secured by planning conditions.

Recommendations

Based on Aprica's assessment of the highway proposals to date, together with the evidence of the existing highway conditions in the area and the very low likelihood of better and increased sustainable travel, it is Aprica's considered opinion that this Planning Application should be refused.

It is recommended that the Applicant be required to review and revise their entire proposals, with a view to scaling back the proposed development to something that is far less likely to create overspill parking, revise the proposed Highway Works to make safe, sustainable travel more attractive and more achievable. Proposals for safe and sustainable travel should be expanded to cover the wider area so that there is connectivity to the application site. The ratio of residential, commercial and visitor parking should be much closer to Kent County Council and Ashford Borough Council's Policy figures. Any associated Travel Plan should be robust and enforceable with a monitoring and measuring process agreed. All of these issues should be secured by planning conditions and monitored & enforced after completion.

8 APPENDICES (also attached as separate PDF documents)

Appendix A – Q145-MA-XX-XX-DR-C-02000, 02001, 02002 and 02003.

