

[REDACTED]

From: [REDACTED]@esquiredevelopments.com>
Sent: Wednesday, May 14, 2025 18:26
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@dover.gov.uk>; [REDACTED]@DOVER.GOV.UK>; [REDACTED]
[REDACTED]@esquiredevelopments.com>; [REDACTED]
[REDACTED]@esquiredevelopments.com>; [REDACTED]@esquiredevelopments.com>
Subject: Re: Wingham Ctte

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Thanks [REDACTED]

We will double check the Assessment covers these points.
What's the process from here? Submit informally and back to Ctte with a legal report advising of the concern over the previous decision and in light of clarificatory informationto be reconsidered?



[REDACTED]
Head of Land & Planning

T. [REDACTED]
M. [REDACTED]

www.esquiredevelopments.com

Studio 3, The Old Laundry
Longfield Kent DA2 8EB



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Cc: [REDACTED]@dover.gov.uk>; [REDACTED]@DOVER.GOV.UK>; [REDACTED]
[REDACTED]@esquiredevelopments.com>; [REDACTED]@esquiredevelopments.com>; P
[REDACTED]@esquiredevelopments.com>
Subject: Re: Wingham Ctte

Dear [REDACTED]

██████ had the opportunity to discuss this with ██████ last week. Additional information that may assist in demonstrating highway safety (ideally written by a highway expert) includes the following;

- An explanation as to why pedestrians would use the proposed crossing as opposed to the desire line across the mouth of the junction, with reference to the Manual for Streets recommendations referenced at committee.
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Please could the above be incorporated into the Road Safety Assessment.

Kind regards,

██████



██████
Senior Planning Officer

Dover District Council

Council Offices, White Cliffs Business Park, Whitfield,

Dover CT16 3PJ

Tel: ██████

Email: ██████@dover.gov.uk

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From: ██████

Sent: Wednesday, May 14, 2025 15:55

To: ██████

Cc: ██████

Subject: RE: Wingham Ctte

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Hi ██████

Sorry to chase again but I am out the office for the next couple of days after today and keen to understand where we sit and if a meeting is in the diary with the Chairman and Leader etc.



Head of Land & Planning

Studio 3, The Old Laundry
Longfield Kent DA2 8EB

T.
M.



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From: [REDACTED]
Sent: 12 May 2025 15:47
To: [REDACTED]@dover.gov.uk>; [REDACTED]@DOVER.GOV.UK>; [REDACTED]@dover.gov.uk>
Cc: [REDACTED]@esquiredevelopments.com>; [REDACTED]@esquiredevelopments.com>
Subject: RE: Wingham Ctte

Afternoon [REDACTED]

Would we be able to have an update on the likely date of the meeting please? We are a little in limbo at the moment so keen to understand what our way forward is (it's been 5 weeks since ctte)?

I have the Road Safety Assessment already, so we are keen to share that informally - if you think it would assist?

From: [REDACTED]
Sent: 06 May 2025 14:22
To: [REDACTED]@dover.gov.uk>; [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@esquiredevelopments.com>; [REDACTED]@esquiredevelopments.com>
Subject: RE: Wingham Ctte

Afternoon [REDACTED]

Hope you had a good BH weekend.

Any update on this meeting please?

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[REDACTED]

From: [REDACTED]@esquiredevelopments.com>
Sent: 19 May 2025 16:30
To: [REDACTED]
Subject: RE: [REDACTED]

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Hi [REDACTED]

I tried to call but reception couldn't get through to you.
Im free now if you are around?

[REDACTED]

[REDACTED]
Head of Land & Planning

T. [REDACTED]
M. [REDACTED]

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From: [REDACTED]@dover.gov.uk>
Sent: 19 May 2025 14:15
To: [REDACTED]@esquiredevelopments.com>; [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@esquiredevelopments.com>
Subject: [REDACTED]

Hi [REDACTED]

[REDACTED]

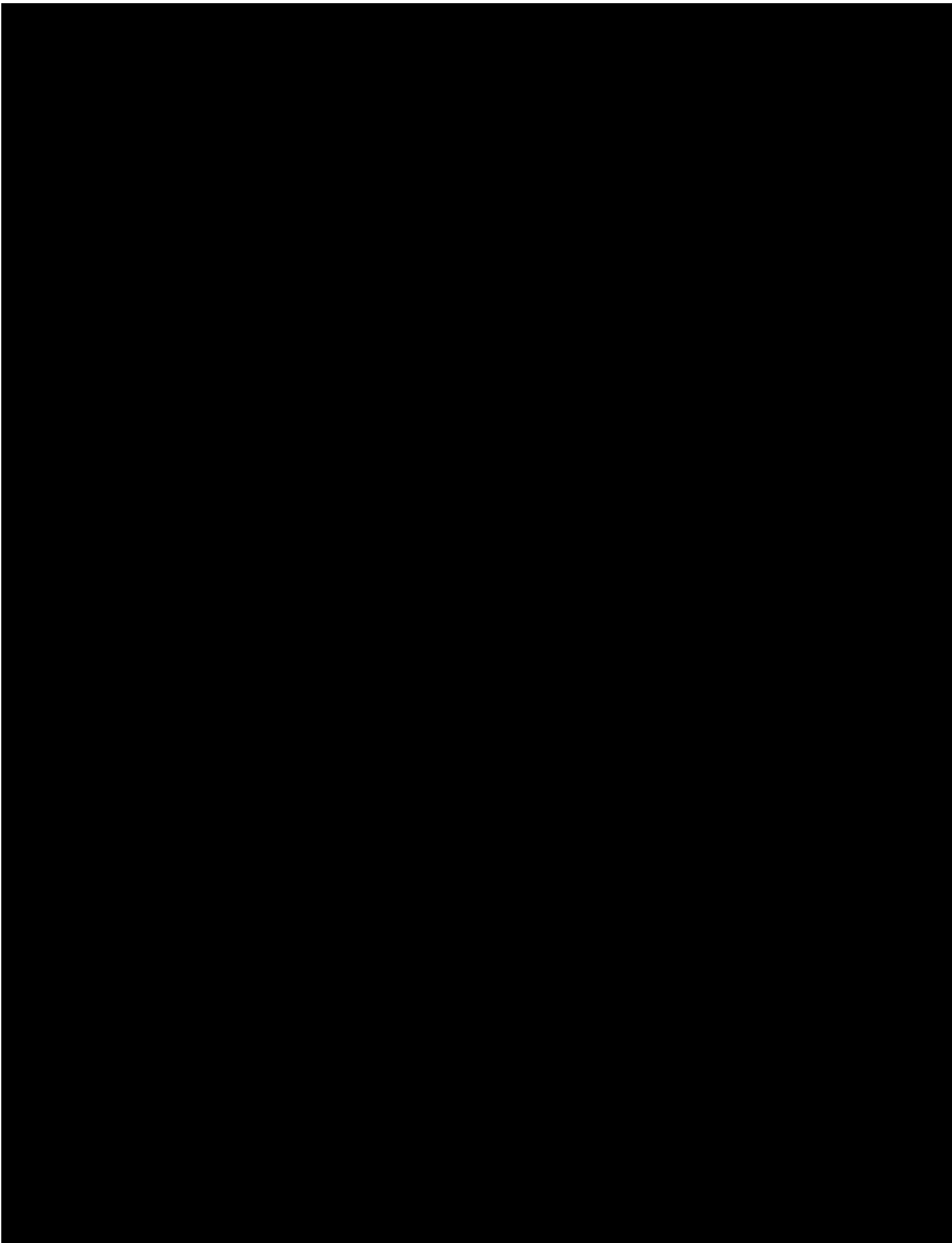
I have tried to call you about Gobery Hill. Could you let me know when would be a good time to catch up.

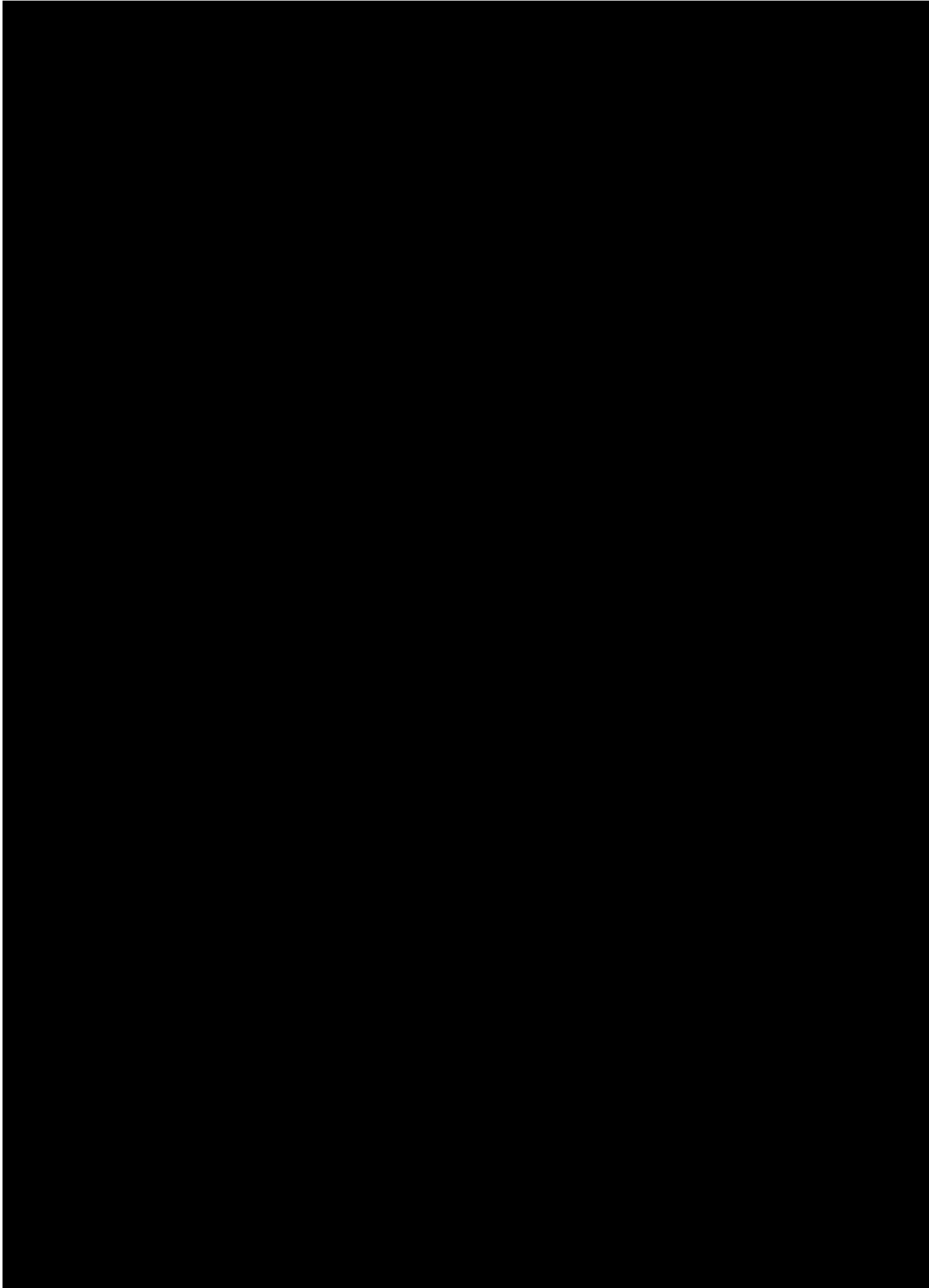
Many thanks

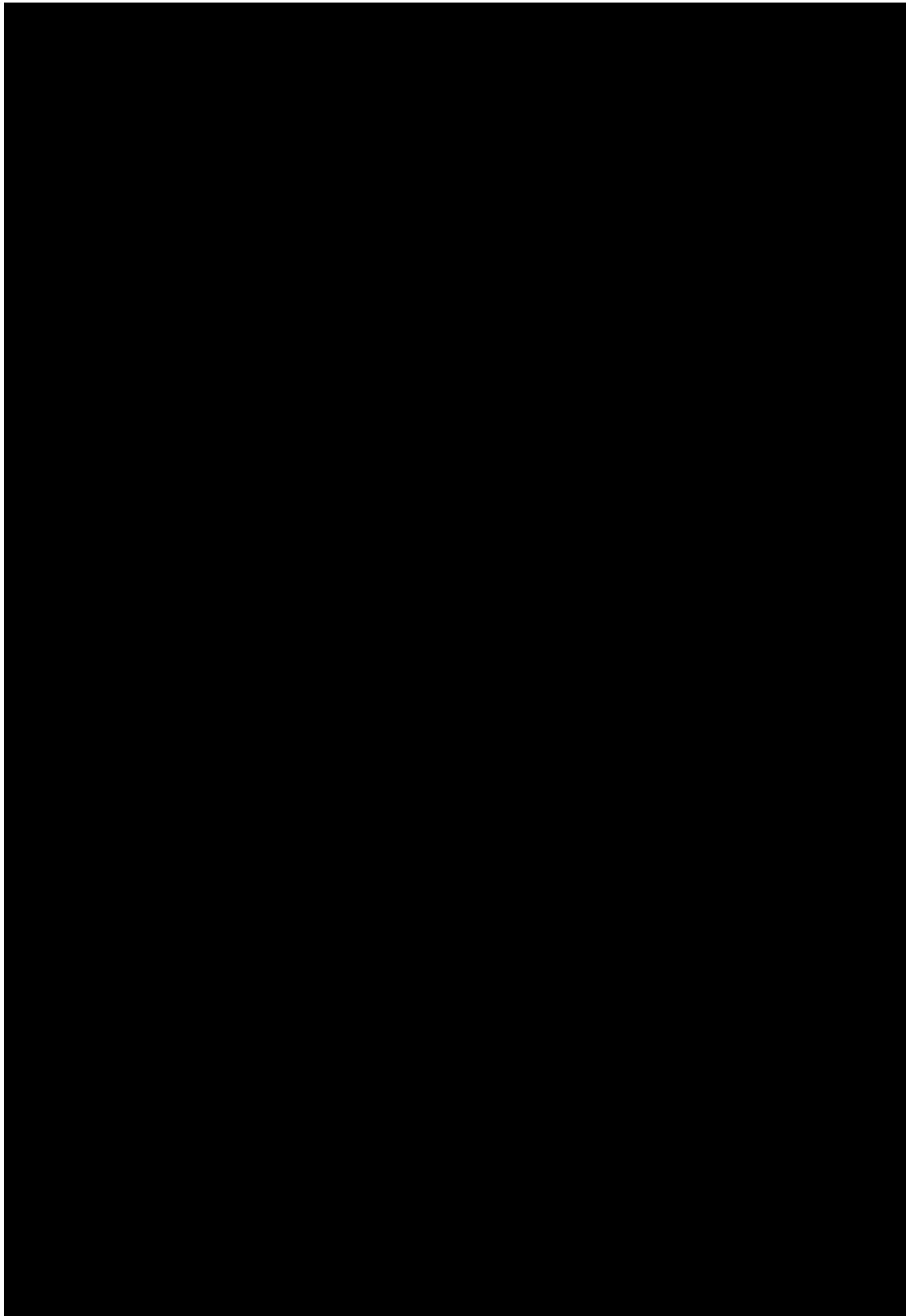
[REDACTED]

[REDACTED]

Planning & Development Manager
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ
Email: [REDACTED]@dover.gov.uk
Web: <http://dover.gov.uk>







the 1990s, the incidence of *S. flexneri* infections has increased in the United Kingdom [10]. In the United States, *S. flexneri* has been reported as the most common cause of bacterial dysentery in children [11].

There is a paucity of data on the epidemiology of *S. flexneri* in the United Kingdom. In the 1980s, *S. flexneri* was the most commonly isolated enteric pathogen from patients with acute colitis in the United Kingdom [12]. In the 1990s, *S. flexneri* was the most commonly isolated enteric pathogen from patients with acute colitis in the United Kingdom [13].

The aim of this study was to determine the prevalence of *S. flexneri* in the United Kingdom. The study was designed to determine the prevalence of *S. flexneri* in the United Kingdom. The study was designed to determine the prevalence of *S. flexneri* in the United Kingdom.

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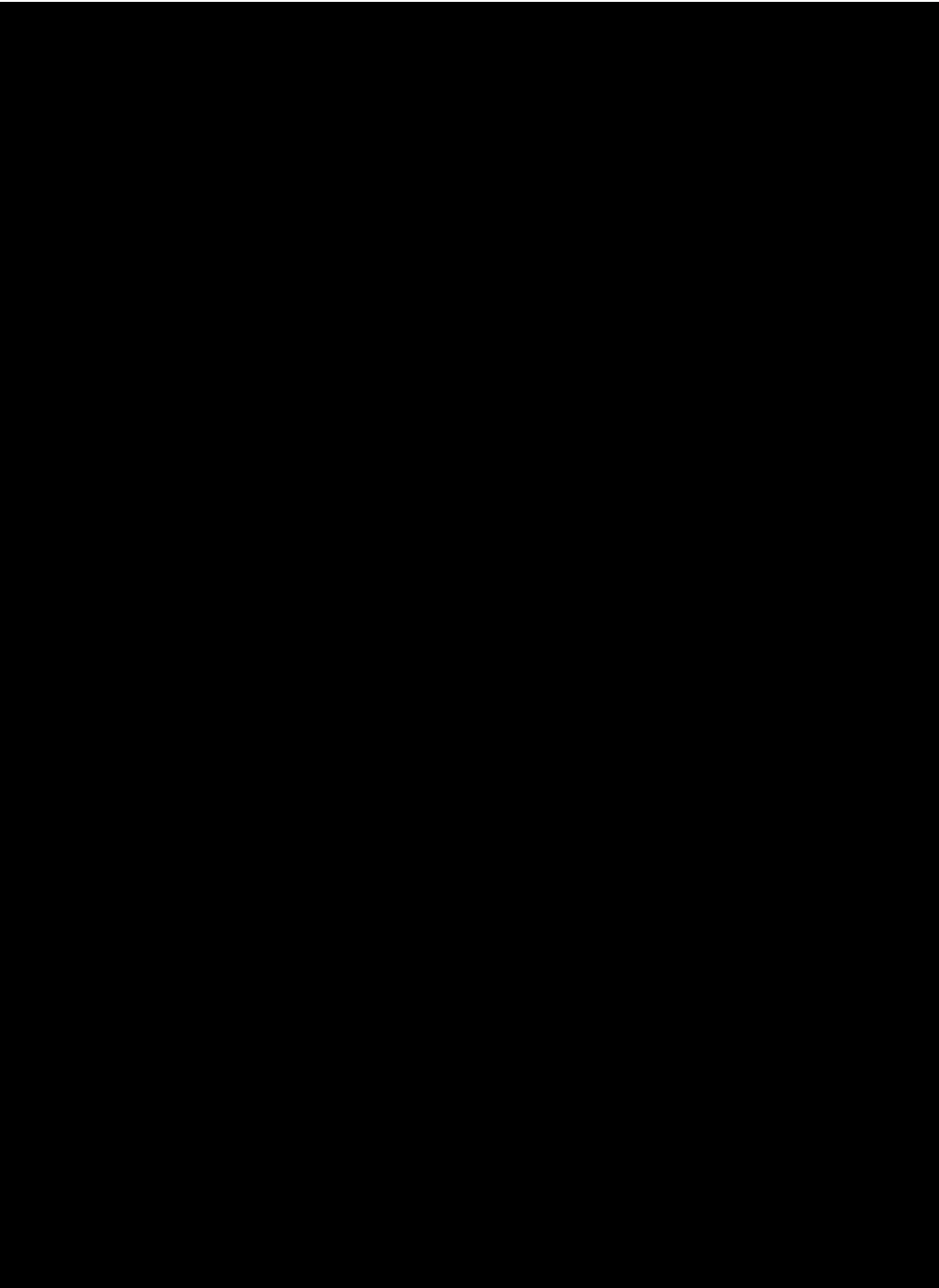
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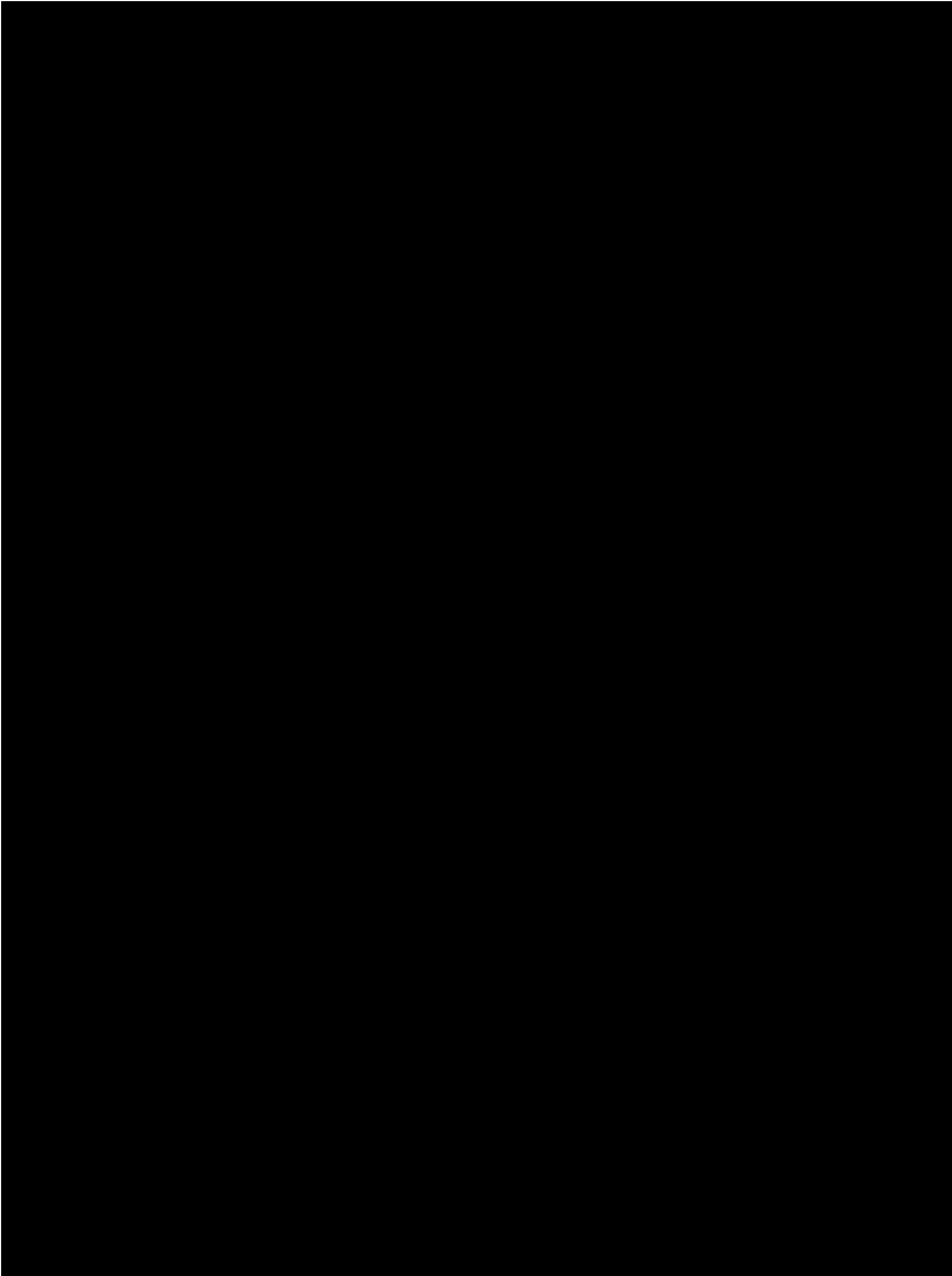
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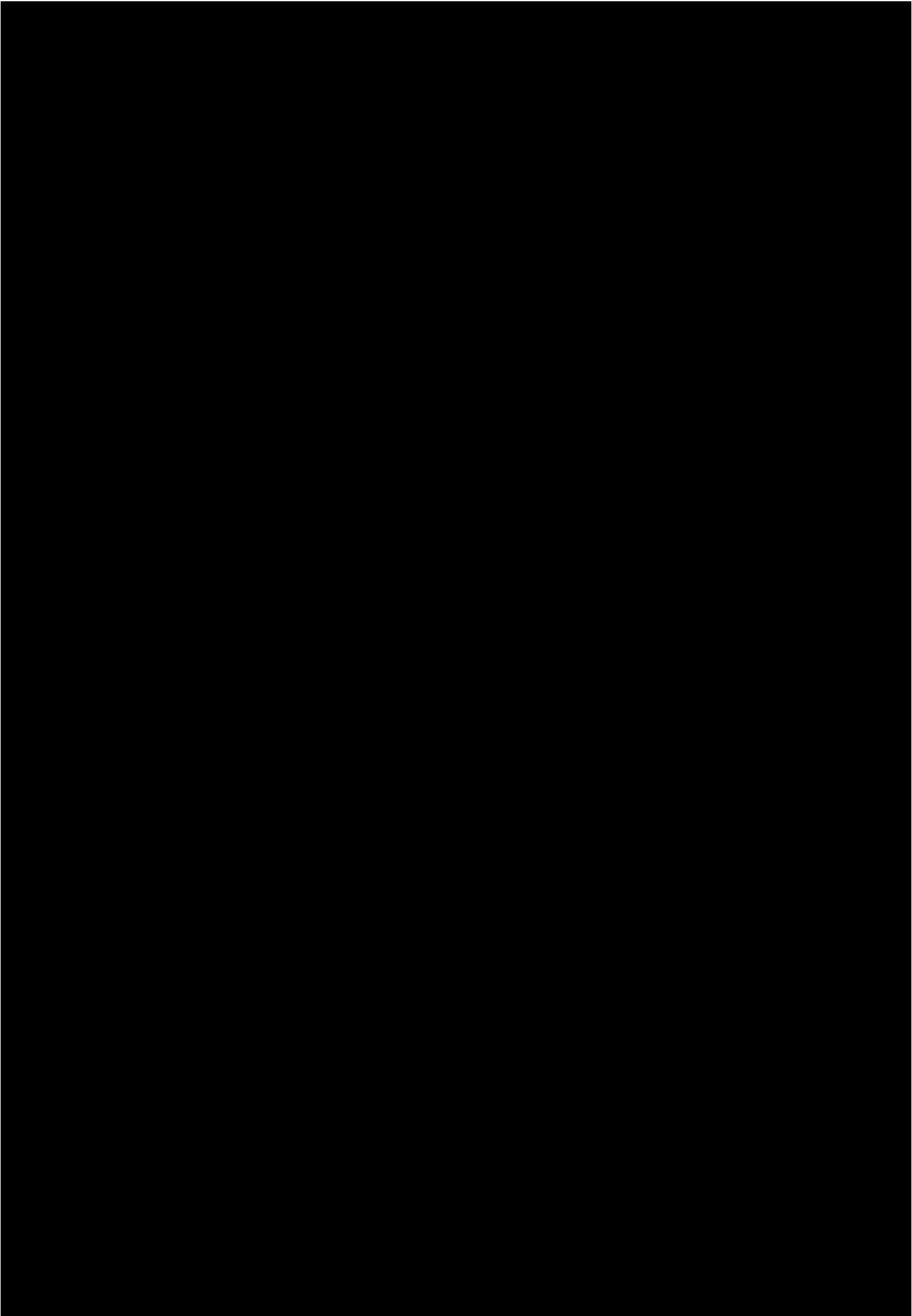
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From: [REDACTED]@esquiredevelopments.com>

Sent: Thursday, May 29, 2025 10:28

To: [REDACTED]@dover.gov.uk>; [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>

Cc: [REDACTED]@esquiredevelopments.com>; [REDACTED]@esquiredevelopments.com>; [REDACTED]@esquiredevelopments.com>

Subject: FW: FW: Wingham Ctte

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Further to ongoing discussions, please find attached clarificatory information addressing the previous committee's discussion points.

The specific comments below are addressed in Paragraphs 4.7 and 4.9 (Point 6), and 4.4 of the RSA, respectively and the cover letter sets out our position.

I understand there is a new Chair of planning ctte and that further discussions are taking place early next week.



[REDACTED]
Head of Land & Planning

T. [REDACTED]
M. [REDACTED]

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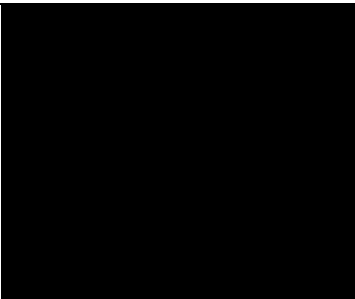


Road Safety Assessment

**Gobery Hill Development and Associated
Section 278 Works, Wingham**

Client: DHA Transport

Road Safety Answers reference no: PR046

Control Sheet

	Name	Date	Signature
Author		25/04/2025	
Checker		30/04/2025	
Authoriser		19/05/2025	

Report Version

Project Report Ref.	Version	Date of Issue
PR046	Final v1	01/05/2025
PR046	Final v2	06/05/2025
PR046	Final v3	19/05/2025

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1. Introduction

- 1.1** Road Safety Answers Ltd (RSA Ltd) has been commissioned by DHA Transport to carry out an independent road safety assessment on the highway works associated with a 17 dwelling residential development on Land North of Gobery Hill, Wingham and, in particular, the proposed Section 278 works at the junction of the A257 Gobery Hill and Preston Hill.
- 1.2** The Road Safety Assessment was carried out by Road Safety Answers (RSA) Ltd during April 2025, the site having been visited by RSA Ltd's Audit Team in May 2024, and then by the two directors of RSA Ltd on 22nd April, 2025.
- 1.3** This Assessment documents the thought processes of the road safety auditors during the 2024 audit, and discusses Wingham Parish Council's objections to the proposals and the concerns raised by Members of Dover District Council's Planning Committee..
- 1.4** RSA Ltd's safety reviewer, Paul Martin, has extensive experience in providing specialist consultancy and training services in traffic management and road safety engineering to a wide client base in both the public and private sectors in the UK and overseas.
- 1.5** As Director of his own consultancy, Road Safety Answers Ltd, and his previous role as Senior Road Safety Consultant at TMS Consultancy, a world leading Road Safety Engineering training company, Paul Martin has extensive experience of working in large consultancies as the lead in traffic and road safety engineering over the past 25 years, following on from 16 years in Local Authorities. He is a Chartered Engineer experienced in the design and project management of highway, traffic management, road safety, urban regeneration and parking schemes, and the development of road safety policies, programmes and road safety audit procedures.

-
- 1.6** Having worked for TMS between September 2014 and February 2019, Paul was a trainer on many of the courses, such as the RoSPA Road Safety Engineering and Highways Agency Certificate of Competency for Highway Inspectors, and constantly developed new courses that focussed on up-to-date topics, providing highly relevant Continuing Professional Development for highway industry professionals.
- 1.7** Trained by RoSPA on their Road Safety Engineering Courses, Paul is a Fellow and was, until 2018, a committee member of the CIHT's Society of Road Safety Auditors (SoRSA), and sat on the CIHT's Road Safety Panel. He has carried out over 4000 road safety audits over a 31-year period, over 150 of which have been on trunk roads and motorways in the south of England. He contributed to the 2015 update to the road safety audit national standard, HD 19/15 (now GG 119), writing the curriculum of the road safety engineering/road design core module of the former Highways England's RSA Certificate of Competency. He carried out one of the first safety risk assessments for Highways Agency using the standard GD 04/12, and now carries out National Highways' safety risk assessments nationally in accordance with their latest standard, GG 104.
- 1.8** Paul has sat on both the ICE committee offering advice to the House of Commons Select Committee on Traffic Law and Enforcement, and the Parliamentary Advisory Committee for Transport Safety. He has also carried out road safety work outside of the UK, namely in Kuwait, Abu Dhabi, Qatar, Republic of Ireland, and Romania.
- 1.9** Paul has been a speaker at several national and international conferences, the topics including the effects of design standards on road safety, quality audit, shared space, safety auditing controversial schemes, and the future of collision investigation and road death reduction.

2. Background

2.1 Dover District Council (DDC), the planning authority, considered the planning application for this development during October 2024 (planning application DOV/24/00580 -- Erection of 17 dwellings, new vehicular access with associated parking and landscaping - Land North of Gobery Hill, Wingham). The original proposal was considered by KCC officers and the original safety audit team from Road Safety Answers Ltd (Team Leader – Paul Martin), and was deemed acceptable subject to alterations recommended in the road safety audit (report ref. RSA871). These alterations were made by the Design Team at DHA Transport.

2.2 Dover District Council's Planning Committee, however, were unhappy with the original safety audit and sought another, independent, road safety audit of the amended design, i.e the design that was altered to mitigate the risks identified in the original audit. The independent audit considered the redesigned scheme (which mitigated the risks of all seven problems identified in the original audit) and found one additional problem relating to the visibility splay northwards from the eastern side of the uncontrolled pedestrian crossing on Preston Hill. The applicant, therefore, made a slight revision to their proposed layout to accord with the comments made by the independent safety audit team. This resulted in the pedestrian visibility splay cutting across to the rear extent of the highway boundary in front of the adjacent dwelling to the east, from a point 0.95m back from the kerblines, as opposed to a point on the kerblines (considered during the original RSA) where a pedestrian would normally stand to judge a safe gap to cross between, or after, approaching traffic. The visibility splay recommended during the independent RSA would require a localised hedge, that is overhanging the highway, to be cut back.

2.3 It should be noted that, if a road safety audit does not mention a particular issue within the problems section of the report, this does not mean that the issue has not been considered in safety terms. All aspects of a design are considered by the audit team and only the ones that create a potential hazard are entered into the report with recommendations to alter the design to mitigate the risks associated with them.

2.4 Following the redesign after the second, independent, road safety audit, the highway boundary was then checked by KCC officers on site and as such they were content that the revised plan, as tabled by the applicant, is deliverable in terms of safety. As such, they maintained their original representation of no objections subject to the previously recommended conditions.

2.5 Following the independent RSA and KCC's decision not to raise a highways objection to the revised design, Wingham Parish Council (WPC) continued to object on the grounds of road safety and, in particular, vehicle/pedestrian conflicts, as follows:

- 1. A recent injury collision on the A257 between Wingham and Shatterling that resulted in a fatality;*
- 2. WPC believes that cutting back of the hedge on the eastern side of Preston Hill will not result in the required visibility splay for pedestrians northwards;*
- 3. Even if the cutting back of the hedge achieves the required visibility splay, its viability depends on the resident keeping it consistently maintained as such, which is uncertain;*
- 4. WPC consider that a small child could not be seen whilst waiting to cross even if the hedge was removed;*
- 5. The proposed pedestrian crossing starts in an overrun area and the design does not acknowledge that the DfT's Traffic Advisory Leaflet 12/93 (Overrun Areas) and Local Transport Note 1/07 (Traffic Calming) set out that, if not located appropriately, overrun areas can cause difficulties and possible*

-
- danger for pedestrians, and recommends avoiding positioning these areas in places where pedestrians often cross the road;*
- 6. Manual for Streets (DfT 2007) states that "Pedestrian desire lines should be kept as straight as possible at side-road junctions unless site-specific reasons preclude it...Dropped kerbs with the appropriate tactile paving should be provided at all side-road junctions where the carriageway and footway are at different levels. They should not be placed on curved sections of kerbing because this makes it difficult for blind or partially sighted people to orientate themselves before crossing."*
 - 7. The DHA Transport Statement notes speed surveys were undertaken on Preston Hill at the crossing point measuring 85th percentile speeds, all taken at non-peak times during half term breaks. The Traffic Signs Manual, Chapter 6, states: "13.4.3. Vehicle speeds should be recorded at peak and off-peak periods".*
 - 8. Considering whether current guidance constitutes a design requirement or not, the placement of a pedestrian crossing within an overrun area, on a bend and where there are not deliverable visibility splays is not a wise decision and one that, undoubtedly, will lead to vehicle/pedestrian issues; and*
 - 9. Finally, in reality, the proposed crossing is not likely to be used by pedestrians walking from the proposed new development. Pedestrians are much more likely to take a straight route via the traffic island at the bottom of Preston Hill. Essentially this means that the upheaval associated with the proposed crossing and loss of parking spaces to existing Preston Hill residents is a pointless and redundant exercise.*

2.6 Members of DDC's Planning Committee, resolved to refuse the application on highway safety grounds at the deferred meeting but a decision to that effect has not yet been issued. The planning authority

are now considering reporting the application back to their Planning Committee following their review of this road safety assessment.

3. Methodology

- 3.1** The assessment has been carried out using engineering judgement based on the assessor's experience in road safety engineering, risk assessment and the analysis of injury collisions.
- 3.2** It investigates whether the junction of Gobery Hill and Preston Hill has an unduly high risk of injury collisions, and goes through the considerations of the Team Leader of the first road safety audit: Paul Martin was the Team Leader and also visited the site during April, 2025, for this road safety assessment. The assessment then considers the safety-related objections raised by Wingham Parish Council (which were echoed by Members of DDC's Planning Committee), and assesses their validity. It then concludes whether the proposed development is likely to result in the Gobery Hill/Preston Hill junction having a significantly increased risk of injury collisions.

4. Safety Assessment

Gobery Hill/Preston Hill/High Street

4.1 The latest 5 years of injury collision data on the public website Crashmap indicates that there have been two injury collisions in the vicinity of, but not at, this junction (Crashmap details in **Appendix A**). Both records indicate that the collisions were more than 20m away from the junction. There are currently five properties whose residents may choose to walk into Wingham to use the various shops and facilities such as the primary school: Topaz and Choristers Cottage, on the north-east corner of the junction; Gobery Farm, the access of which is 150m east of the junction on Gobery Hill; Broom Hill, 200m east of the junction; and Gobery House, 250m east of the junction. Pedestrian movements across the mouth of Preston Hill are, therefore, currently few in number, and the risk of a pedestrian being struck by a vehicle is low due to the small number of crossing movements and the low vehicle speeds approaching and travelling through the junction: the fastest vehicles using Preston Hill are the left turners into Preston Hill, although these speeds have been reduced to circa 20mph by the relatively recent kerb build-out on the south-western shoulder of the junction: during their April 2025 site visit the RSA Ltd directors were not comfortable turning left off High Street at more than 20mph. Speeds approaching the give way on the Preston Hill approach are also relatively low due to the 140m of frequent parking along the west side of Preston Hill which results in opposing vehicles having to give way to one another at regular intervals. This junction, therefore, currently has a **Low** risk of injury collisions.

4.2 It should be noted that it is not possible to state that the risk of injury collisions at any location is nil, given the possibilities of human error, changes in the environmental conditions (such as ice, heavy rain, snow, fog) and vehicle defects (such as worn tyres, faulty brakes), so the recognised risk level for a junction with no injury collisions in

the latest five year period has to be described as **Low**: the Department for Transport, in their Safety Risk Assessment standard, GG 104, has the following risk table, in which the lowest level of risk is **Low**.

Likelihood (L) x Severity (S) = Risk value (R)		Severity (S)				
		Minor harm; Minor damage or loss no injury	Moderate harm; Slight injury or illness, moderate damage or loss	Serious harm; Serious injury or illness, substantial damage or loss	Major harm; Fatal injury, major damage or loss	Extreme harm; Multiple fatalities, extreme loss or damage
Likelihood (L)	Very unlikely; Highly improbable, not known to occur	1	2	3	4	5
	Unlikely; Less than 1 per 10 years	2	4	6	8	10
	May happen; Once every 5-10 years	3	6	9	12	15
	Likely; Once every 1-4 years	4	8	12	16	20
	Almost certain; Once a year or more	5	10	15	20	25
Risk Value (R)		Required action				
Low (1-9)		Ensure assumed control measures are maintained and reviewed as necessary.				
Medium (10-19)		Additional control measures needed to reduce risk rating to a level which is equivalent to a test of "reasonably required" for the population concerned.				
High (20-25)		Activity not permitted. Hazard to be avoided or risk to be reduced to tolerable.				

Considerations of the Audit Team during the May 2024 Road Safety Audit

4.3 The May 2024 road safety audit found seven safety related problems, only one of which involved a potential hazard in Preston Hill, that of parking on the west side restricting visibility to the north for eastbound pedestrians using the proposed uncontrolled crossing, circa 12m from the eastern end of the give way lines, and 20m from the western shoulder of the junction. The risks associated with this problem were mitigated by modifying the design to include a northwards extension of the double yellow lines.

4.4 regarding visibility to the south from the western side of Preston Hill, as stated in paragraph 4.1 above, the fastest vehicles using Preston Hill are the left turners into Preston Hill, although these speeds have been reduced to circa 20mph by the relatively recent kerb build-out on the south-western shoulder of the junction: the recent speed survey showed that the 85th percentile speed of traffic passing the

Preston Hill junction is 21.3 mph. Vehicles turning left into Preston Hill are likely to be travelling slightly slower than this as they turn, at circa 20mph. A 20mph design speed requires intervisibility between approaching traffic and a pedestrian crossing of 25m and, given that the design can provide intervisibility in excess of this (30m), this did not raise a concern for the auditors.

4.5 When considering the visibility northwards from the east side of the proposed uncontrolled crossing on Preston Hill, the auditors recognised that the required visibility can be achieved from the kerbline once the hedge overhanging the highway has been cut back, and can still be achieved if the hedge is allowed to grow back and overhang the highway slightly. Visibility is normally provided from a point set back from the kerbline so that an approaching driver can see a pedestrian approaching the crossing and, at the same time, the pedestrian approaching the crossing can see the approaching vehicle and can maintain their walking speed across the road if the appropriate gap in the traffic is available. However, because visibility northwards is not available for a pedestrian until they reach the crossing due to the curved kerbline and hedge abutting the limit of highway land, the auditors recognised that a pedestrian is likely to stand at the kerbline to assess visibility once at the crossing. Provision of visibility from a point set back from the carriageway is particularly important if pedestrians approach the crossing perpendicular to the road from a distance, i.e. on a wide footway, or having just exited a nearby building or park. This is not the case at this crossing point as pedestrians have to approach the crossing parallel to the kerbline, so the auditors considered that providing visibility from a point set back from the kerbline is less important on the east side of the proposed crossing.

4.6 Furthermore, the provision of an overrun strip gives a pedestrian the chance to take one step onto the road to check that the approaching southbound driver has seen them and is far enough away for a

collision to be avoided. Although an overrun area is part of the carriageway, it is generally only overrun by the rear wheels of a large goods vehicle, car and van drivers avoiding them due to their uneven nature and the risk of a puncture due to their tendency to collect detritus. So, the risk of a pedestrian who enters the overrun area being struck by a vehicle is low. Although an overrun area is often an uneven surface, such a granite setts which are slightly proud of the road surface, the May 2024 audit was carried out on a preliminary design, and the auditors knew that an audit of a future detailed design would recommend a gap in the overrun area where the carriageway surface would be smooth. This is not uncommon where a pedestrian crossing coincides with an overrun area.

- 4.7** The auditors recognised that pedestrians do not want to deviate from their desire line, and that some would continue to cross Preston Hill near to the give way lines, using the existing traffic island. Those doing so, however, would likely have no mobility or sight disabilities as there are no dropped kerbs or tactile paving on each side of the road or at the traffic island. They would also need good hearing so that they can listen for traffic approaching on Preston Hill as they do not have the full visibility splay available because of the bend on the approach to the give way lines. The auditors also considered that those pedestrians from the proposed development who have no mobility, sight or hearing impairments, and are willing to traverse a full height kerb, would also be likely to cross Gobery Hill, just north of the junction, where they only have to judge traffic approaching from two directions, and where there is already a footway outside the driveway of no. 117 High Street (see dotted white line on the Google extract below). In any case, the number of pedestrians walking into the village from this development of 17 dwellings is likely to be small, keeping the risk of pedestrian/vehicle conflicts low.



Google extract showing another informal crossing point for pedestrians who want to avoid using the proposed crossing on Preston Hill

- 4.8** So, the auditors concluded that the proposed uncontrolled pedestrian crossing, with the modifications to extend the waiting restrictions (double yellow lines), to cut the hedge back outside the property 'Topaz', and leave a smooth asphalt area within the overrun strip, would be acceptable in safety terms, the crossing unlikely to result in the current low risk level of pedestrian /vehicle collisions being raised. Note: The independent road safety audit recommended a further improvement to the visibility northwards from the eastern side of the proposed uncontrolled crossing, and KCC Highways agreed that this is achievable.

Safety-related Objections Raised by Wingham Parish Council (WPC)

- 4.9** WPC raised nine perceived safety-related objections, listed above in paragraph 2.4 (repeated here for convenience and underlined). The Assessor's views on these objections as are follows:

1. A recent injury collision on the A257 between Wingham and Shatterling that resulted in a fatality – The assessor is not aware of this collision as the Crashmap records are only

available to the end of 2023. WPC states that it occurred on the A257 between Wingham and Shatterling and is, therefore, not a material consideration with the proposed development access or the proposed improvements at the Preston Hill junction.

2. WPC believes that cutting back of the hedge on the eastern side of Preston Hill will not result in the required visibility splay for pedestrians northwards – Kent Highways have independently assessed the northwards visibility splay from the east side of Preston Hill and have confirmed that, if the hedge is cut back to highway limits, the required intervisibility between a pedestrian on the side of the uncontrolled crossing and a driver approaching on Preston Hill, can be achieved.
3. Even if the cutting back of the hedge achieves the required visibility splay, its viability depends on the resident keeping it consistently maintained as such, which is uncertain – It is the responsibility of the property owner to ensure that their hedge does not obstruct the highway in any way, and the highway authority has the power to serve a notice on the property owner, under the Highways Act 1980, to cut back the hedge if necessary.
4. WPC consider that a small child could not be seen whilst waiting to cross even if the hedge was removed – Once the visibility splay has been achieved by cutting back the hedge, a small child can see and be seen from an approaching vehicle as the visibility would be achieved down to footway level. Furthermore, small children should be supervised by an adult at all times on the highway, and especially when crossing a road, so it is unlikely that a small child will be using this crossing on their own.
5. The proposed pedestrian crossing starts in an overrun area and the design does not acknowledge that the DfT's Traffic Advisory Leaflet 12/93 (Overrun Areas) and Local Transport Note 1/07 (Traffic Calming) set out that, if not located

appropriately, overrun areas can cause difficulties and possible danger for pedestrians, and recommends avoiding positioning these areas in places where pedestrians often cross the road

– The Assessor agrees that an overrun area can cause problems for pedestrians if they have to walk on it, but the detailed design and stage 2 road safety audit would ensure that a gap, with a smooth asphalt surface, would be left within it on the line of the pedestrian crossing.

6. Manual for Streets (DfT 2007) states that "Pedestrian desire lines should be kept as straight as possible at side-road junctions unless site-specific reasons preclude it...Dropped kerbs with the appropriate tactile paving should be provided at all side-road junctions where the carriageway and footway are at different levels. They should not be placed on curved sections of kerbing because this makes it difficult for blind or partially sighted people to orientate themselves before crossing." – At this junction site-specific conditions do, indeed, preclude keeping the preferred pedestrian crossing movement on a straight desire line. Dropped kerbs and tactile paving would be provided, and the blind and partially sighted would be able to orient themselves either using the blips within the tactile paving or the edges of the tactile paving which will point towards the edges of the tactile paving on the other side of the road. Furthermore, blind people are often guided through a new scheme, when it is first constructed, by a friend, relative or the local blind association.
7. The DHA Transport Statement notes speed surveys were undertaken on Preston Hill at the crossing point measuring 85th percentile speeds, all taken at non-peak times during half term breaks. The Traffic Signs Manual, Chapter 6, states: "13.4.3. Vehicle speeds should be recorded at peak and off-peak periods" – Irrespective of whether the speed surveys were carried out at the best times, the Assessor is of the opinion that the geometry of the Preston Hill/Gobery Hill/High

Street junction limits approach and turning speeds from, and into, Preston Hill to levels that are appropriate for the proposed visibility splays from each side of the uncontrolled pedestrian crossing point, in all directions.

8. Considering whether current guidance constitutes a design requirement or not, the placement of a pedestrian crossing within an overrun area, on a bend and where there are not deliverable visibility splays is not a wise decision and one that, undoubtedly, will lead to vehicle/pedestrian issues – WPC's point 8 is answered by points 2, 5 and 6 of this paragraph.
9. Finally, in reality, the proposed crossing is not likely to be used by pedestrians walking from the proposed new development. Pedestrians are much more likely to take a straight route via the traffic island at the bottom of Preston Hill. Essentially this means that the upheaval associated with the proposed crossing and loss of parking spaces to existing Preston Hill residents is a pointless and redundant exercise – The Assessor agrees that not all pedestrians from the new development will use the proposed crossing: those that have no mobility or sight impairments may use the traffic island in the mouth of the Preston Hill junction, or may cross the A257 just east of the junction if they wish to go to the General Store, the dentist, the estate agent or the primary school, all of which are on the left (east) side of the High Street as they walk into Wingham. However, those with mobility and partial sight impairments will need to use the proposed uncontrolled crossing where they can be seen by motorists approaching from all directions, where the blind and partially sighted are given appropriate guidance with tactile paving, and where they do not have to negotiate full height kerbs. The flush kerbs at the proposed crossing are particularly important for wheelchair and mobility scooter users.

5. Summary and Conclusion

5.1 The Design Organisation has produced a scheme which provides access to a 17 unit residential development and improvements to the nearby junction of Gobery Hill/Preston Hill/High Street, Wingham. The scheme has passed two independent road safety audits, the design modified due to the audits' recommendations, mitigating all of the risks associated with the hazards discovered during the audits. KCC Highways have agreed that the design meets current standards in terms of visibility from both sides of the uncontrolled pedestrian crossing on Preston Hill, in all directions.

5.2 As a road safety, highway design and traffic management practitioner with 41 years of experience I am satisfied that both the proposed junction accessing the development on Gobery Hill, and the pedestrian crossing improvements in Preston Hill, can be provided without increasing the risks to all road users beyond the current low levels experienced. Where hazards were introduced by the early preliminary design the risks associated within them have been mitigated during the road safety audit process and subsequent redesign.

5.3 Wingham Parish Council's perceived safety-related objections are, I believe, unfounded given that the visibility requirements at the proposed uncontrolled pedestrian crossing on Preston Hill can be met and have been agreed by the highway authority, Kent County Council. This proposed crossing will particularly benefit pedestrians with mobility and sight impairments, given the proposed dropped kerbs and tactile paving which do not currently exist at this junction. Such facilities will, of course, also benefit the current pedestrians crossing Preston Hill at the junction with High Street and Gobery Hill.

6. Road Safety Assessor

[REDACTED]
National Highways Approved Road Safety Audit Certificate of
Competency
Director, Road Safety Answers Ltd

Signed:

[REDACTED]

Date 19th May 2025

Road Safety Answers

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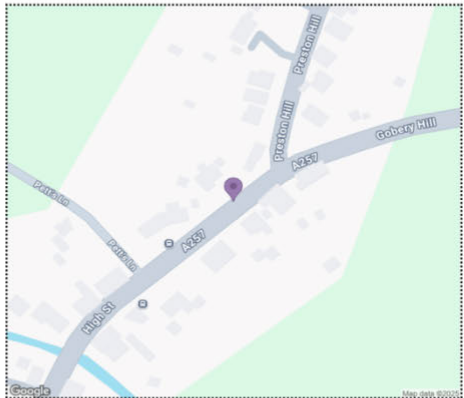
Appendix A – Crashmap data for Preston Hill/Gobery Hill/High Street – 2019 to 2023

Collision 1



Validated Data

Crash Date:	Thursday, January 10, 2019	Time of Crash:	17:20:00	Crash Reference:	2019460812263
Highest Injury Severity:	Serious	Road Number:	A257	Casualties:	2
Highway Authority:	Kent exc Medway Towns			Vehicles:	4
Local Authority:	Dover			OS Grid Reference:	624447 157943
Weather Description:	Fine without high winds				
Road Surface Description:	Wet or Damp				
Speed Limit:	30				
Light Conditions:	Darkness: street lights present and lit				
Carriageway Hazards:	None				
Junction Detail:	Not at or within 20 metres of junction				
Junction Pedestrian Crossing:	No physical crossing facility within 50 metres				
Road Type:	Single carriageway				
Junction Control:	Unknown				
Vehicles Involved					




For more information about the data please visit: www.crashmap.co.uk/home/faq

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Validated Data

Crash Date: Thursday, January 10, 2019 **Time of Crash:** 17:20:00 **Crash Reference:** 2019460812263


Vehicle Ref	Vehicle Type	Vehicle Age	Driver Gender	Driver Age Band	Vehicle Manoeuvre	First Point of Impact	Journey Purpose	Hit Object - On Carriageway	Hit Object - Off Carriageway
1	Car (excluding private hire cars 2005 onwards)	14	Male	66 - 75	Vehicle proceeding normally along the carriageway, on a left hand bend	Offside	Unknown	None	None
2	Car (excluding private hire cars 2005 onwards)	14	Male	56 - 65	Vehicle proceeding normally along the carriageway, on a right hand bend	Offside	Journey as part of work	None	None
3	Car (excluding private hire cars 2005 onwards)	10	Female	26 - 35	Vehicle proceeding normally along the carriageway, on a right hand bend	Offside	Journey as part of work	None	None
4	Car (excluding private hire cars 2005 onwards)	-1	Female	46 - 55	Vehicle proceeding normally along the carriageway, on a right hand bend	Front	Journey as part of work	None	None

Casualties


Vehicle Ref	Casualty Ref	Injury Severity	Casualty Class	Gender	Age Band	Pedestrian Location	Pedestrian Movement
1	1	Serious	Driver or rider	Male	66 - 75	Unknown or other	Unknown or other
3	2	Slight	Driver or rider	Female	26 - 35	Unknown or other	Unknown or other

For more information about the data please visit: www.crashmap.co.uk/home/faq

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Collision 2


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Validated Data

Crash Date: Monday, April 11, 2022 **Time of Crash:** 08:26:00 **Crash Reference:** 2022461169940

Highest Injury Severity: Slight **Road Number:** U **Casualties:** 1

Highway Authority: Kent exc Medway Towns **Vehicles:** 2

Local Authority: Dover **OS Grid Reference:** 624476 158011

Weather Description: Fine without high winds

Road Surface Description: Dry

Speed Limit: 20

Light Conditions: Daylight: regardless of presence of streetlights

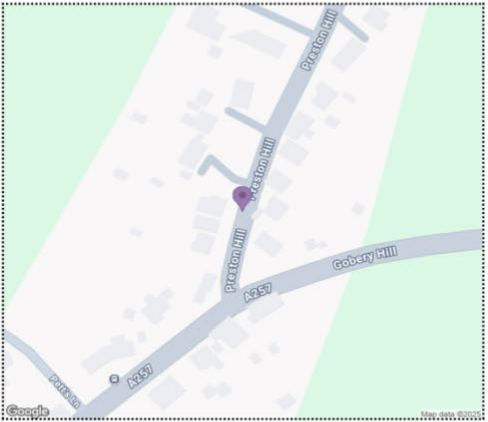
Carriageway Hazards: None

Junction Detail: Not at or within 20 metres of junction

Junction Pedestrian Crossing: No physical crossing facility within 50 metres

Road Type: Single carriageway

Junction Control: Unknown




For more information about the data please visit: www.crashmap.co.uk/home/faq

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Validated Data

Crash Date: Monday, April 11, 2022
 Time of Crash: 08:26:00
 Crash Reference: 2022461169940

Vehicles Involved


Vehicle Ref	Vehicle Type	Vehicle Age	Driver Gender	Driver Age Band	Vehicle Manoeuvre	First Point of Impact	Journey Purpose	Hit Object - On Carriageway	Hit Object - Off Carriageway
1	Car (excluding private hire cars 2005 onwards)	7	Female	46 - 55	Vehicle proceeding normally along the carriageway, not on a bend	Nearside	Unknown	None	None
2	Car (excluding private hire cars 2005 onwards)	-1	Unknown	Unknown	Vehicle is parked in the carriageway	Did not impact	Journey as part of work	None	None

Casualties

Vehicle Ref	Casualty Ref	Injury Severity	Casualty Class	Gender	Age Band	Pedestrian Location	Pedestrian Movement
1	1	Slight	Pedestrian	Male	56 - 65	In carriageway, not crossing	In carriageway, stationary - not crossing (standing or playing)

For more information about the data please visit: www.crashmap.co.uk/home/faq

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██████████
Dover District Council

Our ref: PL/33018

Sent by Email

19 May 2025

Dear ██████████

**PLANNING APPLICATION REFERENCE: 24/00580
LAND NORTH OF GOBERY HILL, WINGHAM – ROAD SAFETY ASSESSMENT**

I write with reference to the meeting of Dover District Council (DDC)'s Planning Committee on Thursday 3rd April 2025 – where Members resolved to refuse the above-referenced planning application on highway safety grounds – and your subsequent engagement with the applicant.

In view of the nature of the concerns raised by Planning Committee Members and Wingham Parish Council, the applicant has instructed the author of the original Road Safety Audit (Paul Martin, of Road Safety Answers Ltd) to prepare a Road Safety Assessment report, which specifically addresses these concerns and documents the thought processes of the Auditors when carrying out the Audit. A copy of the Road Safety Assessment is enclosed. It concludes:-

"As a road safety, highway design and traffic management practitioner with 41 years of experience I am satisfied that both the proposed junction accessing the development on Gobery Hill, and the pedestrian crossing improvements in Preston Hill, can be provided without increasing the risks to all road users beyond the current low levels experienced."

As you are aware, Kent County Council (KCC) as the Local Highway Authority concurs with this view.

With specific regard to the concerns expressed by Members and the Parish Council in respect to the ongoing maintenance of the hedge fronting the property 'Topaz' on the eastern side of the A257 / Preston Hill junction, I wish to draw your attention to Sections 141 and 154 of the Highways Act 1980. Section 141 reads as follows:-

"141 Restriction on planting of trees etc. in or near carriageway

planning transport design environment infrastructure land



- (1) Subject to sections 64 and 96 above and section 142 below, no tree or shrub shall be planted in a made-up carriageway, or within 15 feet from the centre of a made-up carriageway.*
- (2) If a tree or shrub is planted in contravention of this section the highway authority for the highway... may by notice given either to the owner or to the occupier of the land in which the tree or shrub is planted require him to remove it within 21 days from the date of service of the notice.*
- (3) If a person fails to comply with a notice under subsection (2) above he is guilty of an offence and liable to a fine..."*

Section 154 further states:-

"154 Cutting or felling etc. trees etc. that overhang or are a danger to roads or footpaths

- (1) Where a hedge, tree or shrub overhangs a highway or any other road or footpath to which the public has access so as to endanger or obstruct the passage of vehicles or pedestrians, or obstructs or interferes with the view of drivers of vehicles... a competent authority may, by notice either to the owner of the hedge, tree or shrub or to the occupier of the land on which it is growing, require him within 14 days from the date of service of the notice so to lop or cut it as to remove the cause of the danger, obstruction or interference."*

It is therefore clearly evident that KCC has the means to compel the owner of the hedge in question to ensure its ongoing maintenance in perpetuity and to take enforcement action if instructions to this effect are not adhered to.

Furthermore, the applicant is willing to instruct their appointed development management company to include regular monitoring and upkeep of the hedge as part of its ongoing maintenance regime, which KCC Highways and Transportation have confirmed would be permissible in this case.

I trust that the above and enclosed information is sufficient to enable the planning application to be reconsidered positively by the Planning Committee. If you have any further questions, please do not hesitate to contact me.



Yours sincerely,

[Redacted signature]

[Redacted name]

Director

Direct email: [Redacted] [@dhatransport.co.uk](mailto:[Redacted]@dhatransport.co.uk)