

Transport Statement
Former Highview School Site
Moat Farm Road
Folkestone
CT19 5DJ

RMB Consultants (Civil Engineering) Ltd
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RMB Consultants (Civil Engineering) Ltd
39 Cossington Road
Canterbury
Kent
CT1 3HU

Tel 01227 472128
www.rmbconsultants.co.uk

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1. Introduction

RMB Consultants (Civil Engineering) Ltd has been appointed to produce a Transport Statement to support a planning application for proposed development on land at the Former Highview School Site, Moat Farm Road, Folkestone, CT19 5DJ.

Pre-application advice has been obtained from Kent County Council as Highway Authority. The advice is as follows:

Access to the proposed site would be via Downside and Moat Farm Road. This raises no safety issues for us as the majority of houses on Downside and Moat Farm Road have driveways, and these two roads are quite wide in nature. Therefore any on street parking that does occur does not impede on the expected increase of traffic.

The width of the new road as part of the development is approximately 6m wide, which is adequate and allows for the safe passage of refuse vehicles and fire tenders. We would ask you to provide tracking for a 11.4m refuse vehicle, so we can ensure all turning heads provide the required turning space required. Please consider in particular the turning head in the south east corner, as this would appear to be too small for a refuse vehicle.

We note that in total 51 parking spaces have been provided, and current parking guidelines would require a total of 47 spaces in total (40 for the dwellings and 7 visitor parking spaces). We would recommend if you have the space available that you allocate 2 spaces for each 2 and 3 bed dwelling, to keep any on street parking to a minimum and to prevent obstructive parking in any turning heads. We would require plans demonstrating the parking allocation for each property. We also note that there are no parking spaces provided adjacent to the flats (we have assumed the parking spaces to the left of the entrance to the new road are for the flats). We would recommend that parking spaces are provided as near to the entrance of the flats as possible, as experience has taught us that failure to provide allocated parking close to the entrance of any flats leads to on street parking.

The visitor parking bays need to be evenly distributed throughout the development, and we would require plans demonstrating the allocation of visitor spaces.

We would also require details of the provision of bicycle storage for each dwelling. For the 2/3 bedroom dwellings one space per bedroom is required and this can be in the form of a shed in the garden. For the 1 bedroom flats a total of 6 spaces in a covered and secure facility would be required.

1.1 Site Location

The site is located off Moat Farm Road, Folkestone, Figures 1 and 2.

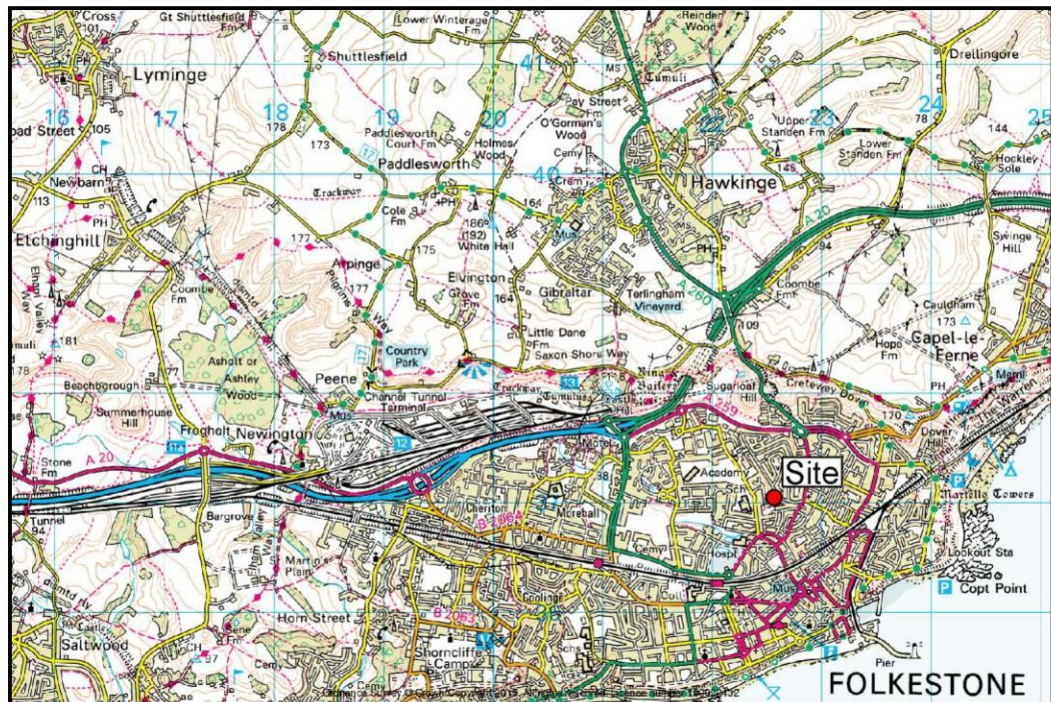


Figure 1. Site location.

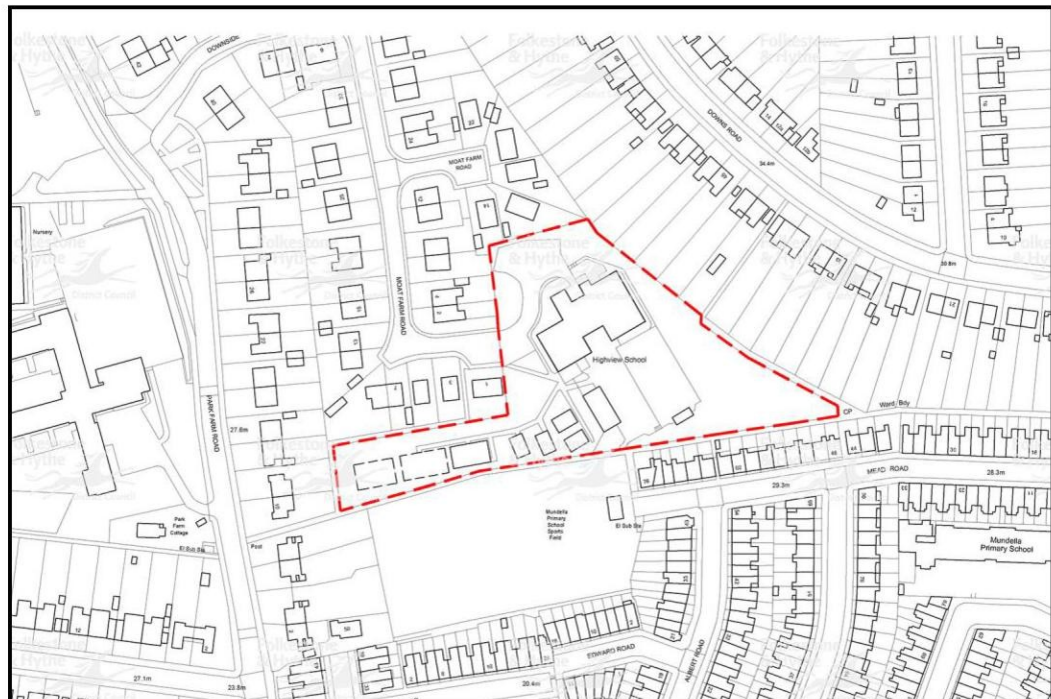


Figure 2. Site location plan.

1.2 Existing Site Use

The site is currently vacant but its former use was as a specialist school.

1.3 Proposed Site Use

The proposed development is for Local Authority social housing providing 33 dwellings. The proposal is for a mixture of 1,2, 3 and 4 bed properties to consist of:

- 1 No 2 bed bungalow (wheelchair compliant)
- 2 No 2 bed bungalows
- 11 No 2 bed houses
- 10 No 3 bed houses
- 2 No 4 bed House
- 1 No 4 bed House (Wheelchair compliant)
- 6 No 1 bed flats.

The proposed layout is shown in Figure 3.



Figure 3. Proposed site plan.

2. Scope

The report considers the transport effects of the existing and proposed development as follows:

Chapter 3 reviews the current national and local transport policy framework as applicable to the site.

Chapter 4 assesses the existing transport conditions.

Chapter 5 considers transport conditions as a result of the proposed development.

Chapter 6 considers a Travel Plan and initiatives that could be implemented to limit the use of cars and promote more sustainable travel options.

Chapter 7 assesses parking and the internal layout within the proposed development site.

Chapter 8 assesses the impact of the proposed development on the transport network and compliance with the national and local policy framework.

Chapter 9 provides a summary of and conclusion to the report.

3. Policy Framework

National Planning Policy Framework

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.

Chapter 9 Promoting sustainable transport states:

102. *Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
- a) *the potential impacts of development on transport networks can be addressed;*
 - b) *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised - for example in relation to the scale, location or density of development that can be accommodated;*
 - c) *opportunities to promote walking, cycling and public transport use are identified and pursued;*
 - d) *the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account - including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*
103. *The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.*

The following paragraphs apply when considering development proposals:

108. *In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

- a) *appropriate opportunities to promote sustainable transport modes can be - or have been - taken up, given the type of development and its location;*
 - b) *safe and suitable access to the site can be achieved for all users; and*
 - c) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*
109. *Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*
110. *Within this context, applications for development should:*
- a) *give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second - so far as possible - to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
 - b) *address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
 - c) *create places that are safe, secure and attractive - which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
 - d) *allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
 - e) *be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*
111. *All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.*

Local Transport Plan for Kent 2016-31

Local Transport Plan 4 sets out Kent's vision for 2016-2031. It identifies five policies that are targeted at delivering specific outcomes:

Outcome 1: Economic growth and minimised congestion

Policy: *Deliver resilient transport infrastructure and schemes that reduce congestion and improve journey time reliability to enable economic growth and appropriate development, meeting demand from a growing population.*

Outcome 2: Affordable and accessible door-to-door journeys

Policy: *Promote affordable, accessible and connected transport to enable access for all to jobs, education, health and other services.*

Outcome 3: Safer travel

Policy: *Provide a safer road, footway and cycleway network to reduce the likelihood of casualties, and encourage other transport providers to improve safety on their networks.*

Outcome 4: Enhanced environment

Policy: *Deliver schemes to reduce the environmental footprint of transport, and enhance the historic and natural environment.*

Outcome 5: Better health and wellbeing

Policy: *Provide and promote active travel choices for all members of the community to encourage good health and wellbeing, and implement measures to improve local air quality.*

Folkestone and Hythe District Council Core Strategy Local Plan 2013

Folkestone and Hythe District Council's Core Strategy Local Plan was adopted in September 2013.

Policy SS3 - Place-Shaping and Sustainable Settlements Strategy requires:

A design-led and sustainable access approach should be taken to density and layout, ensuring development is suited to the locality and its needs, and transport infrastructure (particularly walking/cycling). Efficient use should be made of central land in town centres or in easy walking distance of rail and bus stations, with appropriate redevelopment of complementary uses above ground floor retail, leisure or other active uses, to directly support the vitality of centres.

Policy SS5 - District Infrastructure Planning requires:

The location, design or management of development provides a choice of means of transport and allows sustainable travel patterns, for pedestrians, cyclists and/or public transport. All major trip-generating uses will provide Travel Plans.

There are a number of 'saved' Local Plan Review (2006) policies that continue to apply after the adoption of the Core Strategy which are relevant to transport. These include:

POLICY TR5 which requires the provision of secure and practically located facilities for cyclists in all new developments which are expected to generate a regular flow of traffic.

POLICY TR6 requires new development to consider the needs of pedestrians by providing safe, attractive and convenient pedestrian routes, particularly to public transport routes.

POLICY TR11 states that proposals which involve the formation of a new access, or would result in the intensification of the use of an existing access, will only be permitted where the access is not detrimental to the safety of vehicle traffic, cyclists and pedestrians or the access can alternatively be improved to a standard acceptable to the Highway Authority or the proposal will not increase the risk of accidents or create delays.

POLICY TR12 states that new development, redevelopment or a change of use will only be permitted if it makes provision for off-street parking.

POLICY TR13 requires a travel plan to be submitted where development proposals are considered likely to have significant transport implications including development where there is a particular local traffic problem.

Folkestone and Hythe District Council Core Strategy Review 2019

Folkestone and Hythe District Council is currently consulting on the Folkestone & Hythe District Council's Core Strategy Review Submission Draft. The extracts of Policies SS3 and SS5 quoted above are the same in the Review Submission Draft.

Folkestone and Hythe District Council Transport Strategy

Folkestone and Hythe District Council published a Transport Strategy in February 2011. The Transport Strategy establishes a sound and robust evidence base and considers transport matters within the District and those relating to the potential strategic site allocations which have been made for future development.

4. Existing Transport Conditions

4.1 Local Transport Network

Local Road Network

The site is located to the north of Folkestone town centre. The site is accessed from Park Farm Road via Downside and Moat Farm Road. Park Farm Road gives access to the wider road network, Figure 4.

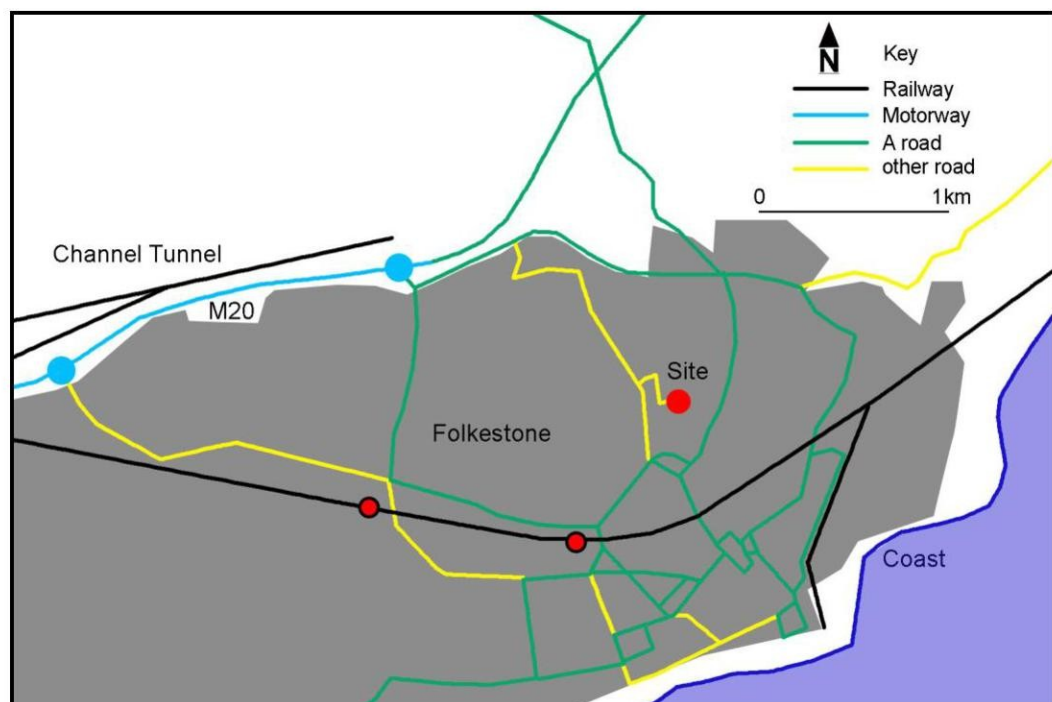


Figure 4. Local road and rail network.

Rail Connections

Folkestone has good rail links to London and East Kent. High speed services to London have journey times of 55 minutes. Folkestone is also home to the Channel Tunnel terminal with Eurotunnel services to Calais.

Bus Connections

The nearest bus stops to the site are on Park Farm Road, adjacent to the site. Bus services from bus stops on Park Farm Road are shown in Table 1.

Route No.	Route	Weekday Frequency	Saturday Frequency	Sunday Frequency
168B	Hythe - Folkestone - Hawkinge	school service	no service	no service
73	Hawkinge - Folkestone Town Centre - Cheriton	every 20 minutes	every 20 minutes	every 30 minutes
91	Dover - Holywell - Folkestone - Broadmead	19 services	19 services	no service
976	Swingfield Minnis - Hawkinge - Folkestone Academy	school service	no service	no service

Table 1. Local bus routes from the bus stops on Park Farm Road.

Additional bus services are available from stops on Black Bull Road just over 400m from the site, Table 2.

Route No.	Route	Weekday Frequency	Saturday Frequency	Sunday Frequency
16	Hythe - Folkestone - Canterbury	every 20 minutes	every 20 minutes	every 30 minutes
19	Saltwood - Hythe - Folkestone - Hawkinge	school service	no service	no service
71	Cheriton - Folkestone - East Cliff - Creteway Down	every 20 minutes	every 20 minutes	every 30 minutes
B	Folkestone - Cheriton - Brockhill Park School	school service	no service	no service

Table 2. Additional local bus routes from the bus stops on Black Bull Road.

The site has good access to regular bus services serving Folkestone and the local area.

Pedestrian and Cycle Connections

There are footways on both sides of Moat Farm Road and Downside linking to Park Farm Road. A footpath (HF13) runs along the southern boundary of the site linking Park Farm Road to Downs Road and Black Bull Road. This footpath (HF13) also links to Moat Farm Road, Figure 5.

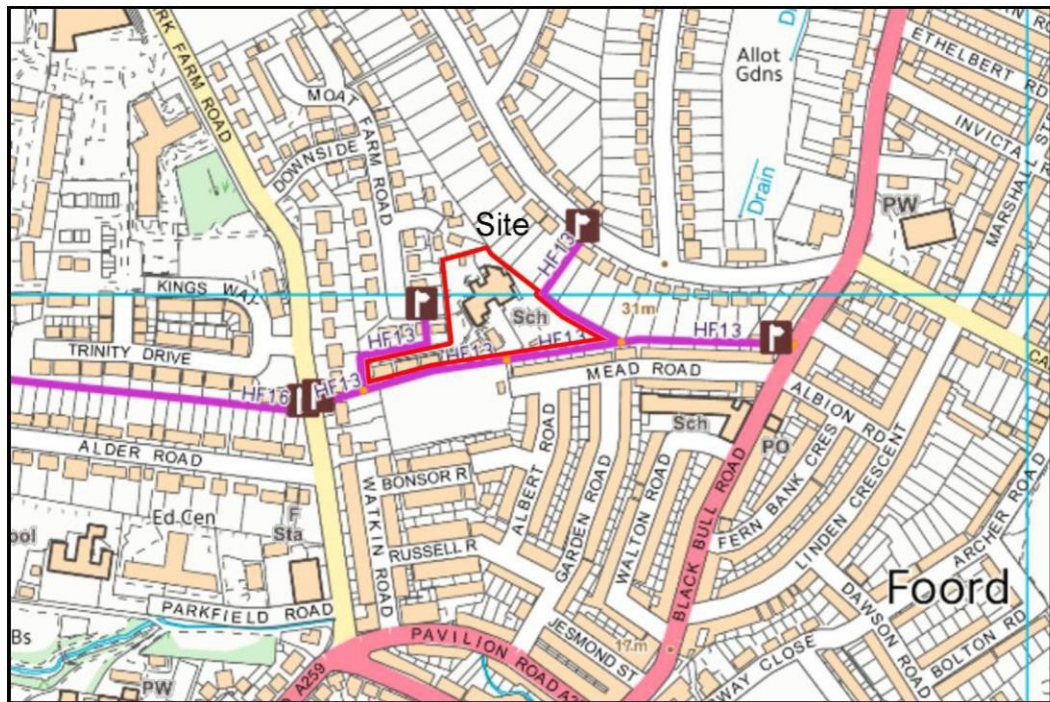


Figure 5. Local footpaths (purple). (© Kent County Council).

4.2 Accessibility and Sustainability

Folkestone and Hythe District Council's Core Strategy Review identifies Folkestone as a Sub-Regional Town. The role of Folkestone is defined as:

To accommodate substantial residential, commercial and social development. To provide improved (inter-) national transport links, and a good choice of employment, retail, cultural/leisure and public services for the whole of the district, adjoining districts and visitors.

The settlement hierarchy is shown in Figure 6.

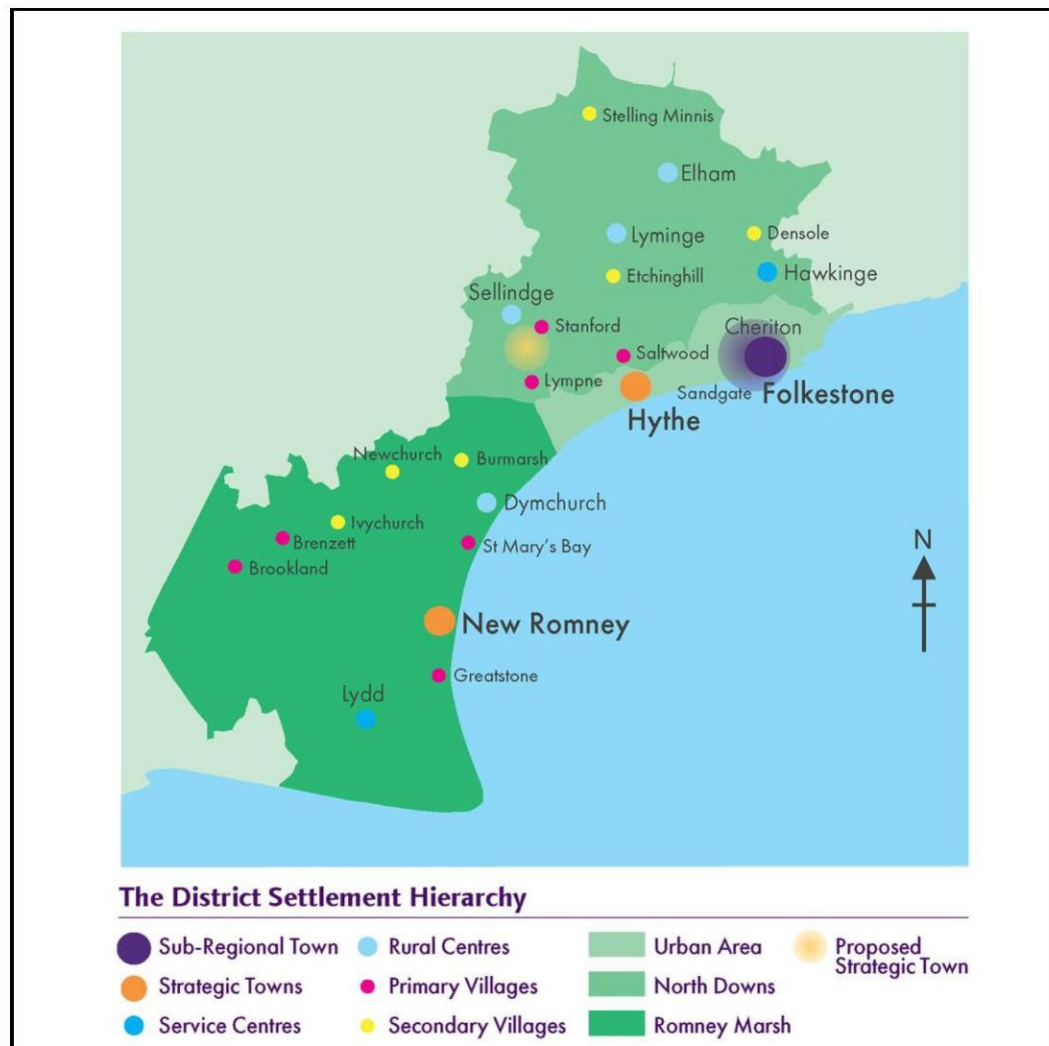


Figure 6. Settlement Hierarchy from the Folkestone and Hythe Core Strategy Review 2019.

TRACC, a leading multi-modal transport accessibility tool which was developed in conjunction with the Department for Transport, local authorities and transport planners, has been used to identify travel times from the site by various transport modes.

Folkestone and Dover are accessible within 30 minutes of the site using public transport, Figure 7. Hythe and Ashford are accessible within 45 minutes. Canterbury is accessible within 60 minutes. These times include the time taken to walk from the site to the public transport node plus the journey time.

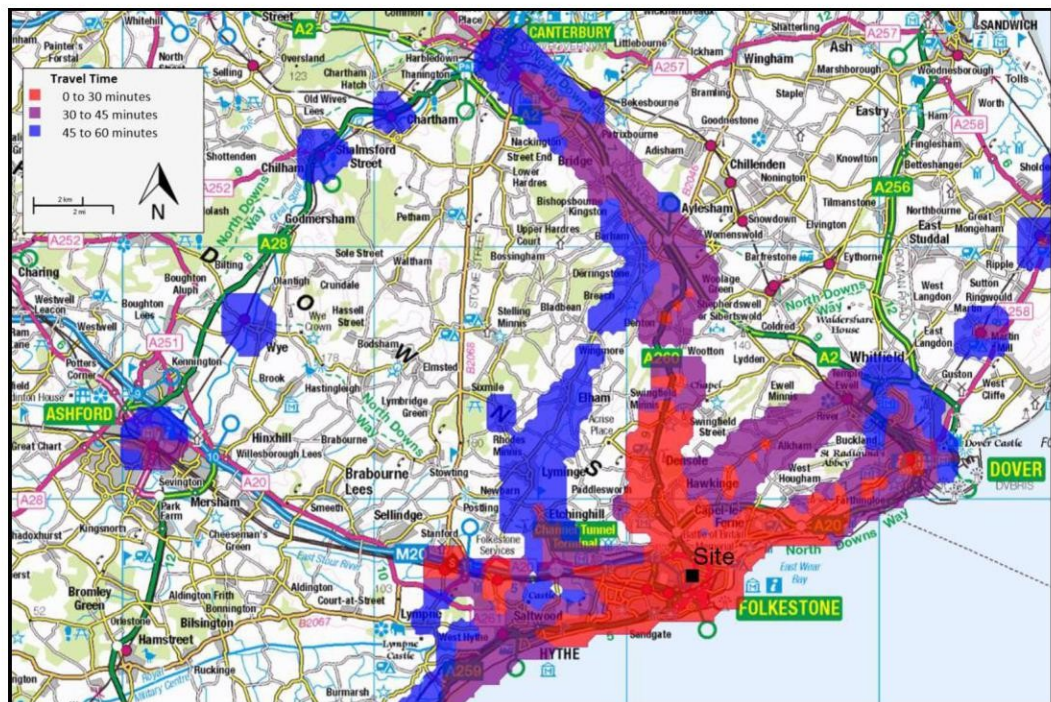


Figure 7. Areas accessible within 30 to 60 minutes of the site using public transport.

By bicycle, Folkestone Central railway station is accessible within 5 minutes. Folkestone town centre and Folkestone West railway station are accessible within 10 minutes, Figure 8.

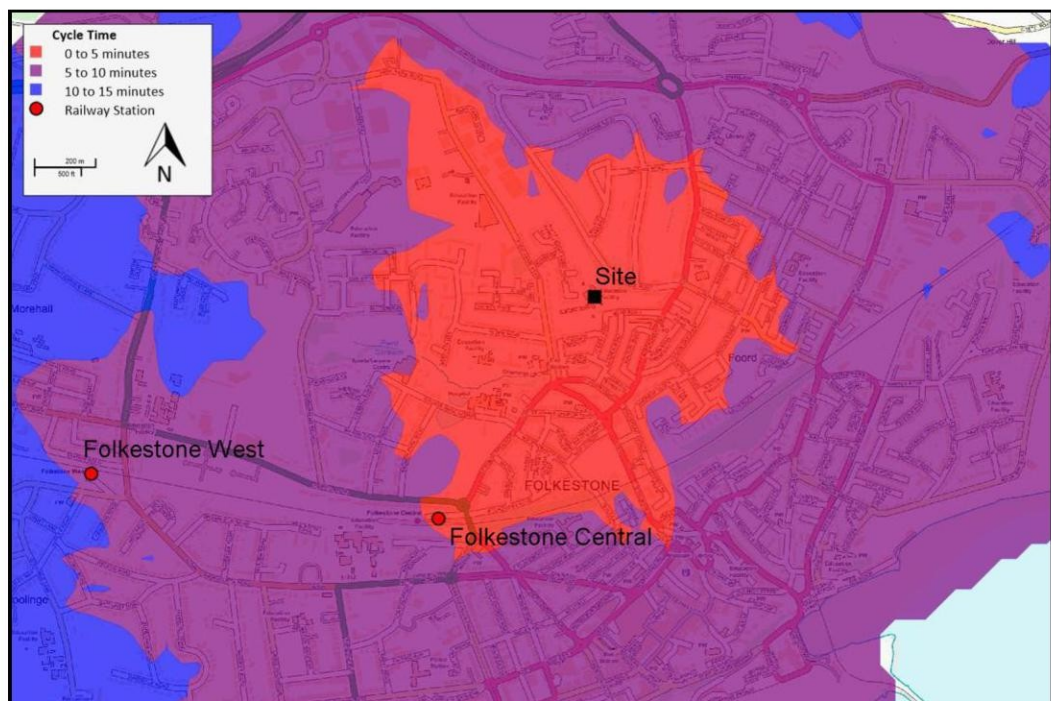


Figure 8. Areas accessible within 15 minutes of the site by bicycle.

TRACC has also been used to identify the areas that are within 400m to 1,200m walk distance of the site using roads and public footpaths. Local bus stops are within 400m of the site. Folkestone Central railway station is within 1,200m walk distance of the site, Figure 9.

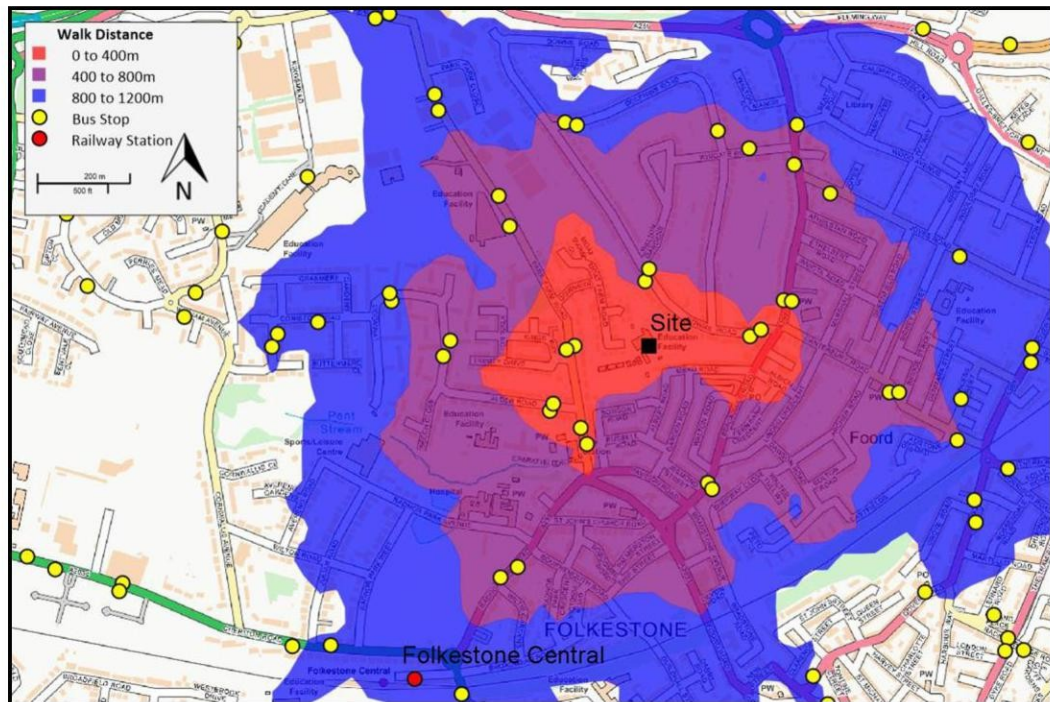


Figure 9. Areas accessible within 400m to 1,200m of the site.

The locations of local major amenities are shown in Figure 10. Mundella Primary School is within 400m walk distance of the site, Stella Maris Catholic Primary School and Beacon SEN School are within 800m as is the Lower Radnor Park Play Area. Radnor Park and Folkestone Sports Centre are within 1,200m walk distance of the site.

The above demonstrates that the site is in an accessible location and is sustainable in terms of transport options.

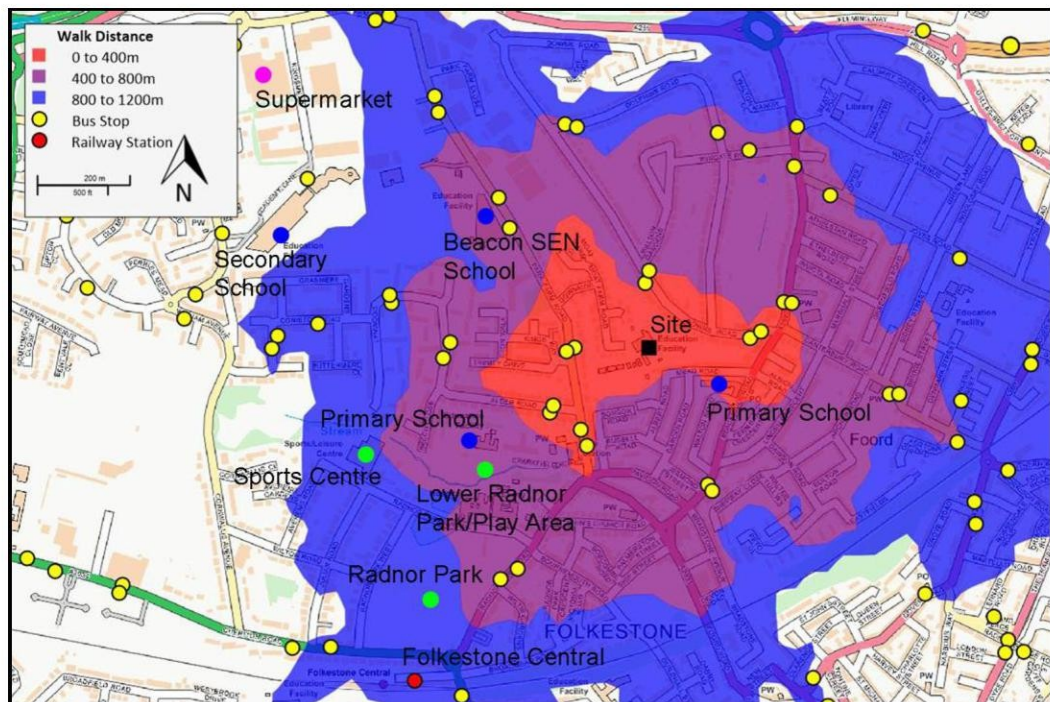


Figure 10. Major amenities accessible within 400m to 1,200m of the site.

4.3 Traffic Data

The closest Department for Transport (DfT) traffic count points to the site are on Black Bull Road (46869), Radnor Park Road (26854) and Foord Road (16799), Figure 11. The annual average daily flow (AADF) of traffic at each point for 2017 is shown in Table 3.



Figure 11. DfT count points.

Count Ref. No.	Pedal Cycles	Motor-cycles	Cars	Buses	LGVs	HGVs	Total Motor Vehicles
16799	41	49	5,276	6	801	94	6,227
26854	56	118	12,335	301	1,382	75	14,210
46869	57	149	12,747	227	1,625	134	14,881

Table 3. AADF traffic counts near to the site 2017.

4.4 Existing Site Access

The site has existing vehicular and pedestrian access onto Moat Farm Road.

4.5 Traffic Generation from the Existing Site

The site is currently vacant. The site is the former home of the Highview school. The 2014 Ofsted report indicates that there were 179 pupils on the school roll.

The Trip Rate Information Computer System (TRICS) is a database of transport surveys and is used to validate assumptions about the transport impact of new developments. Typical trip rates for educational use are shown in Table 4.

Time	Trip Rates per Pupil	Trip Rates (179)
AM peak hour	0.23	41
PM peak hour	0.07	13
Daily	0.81	145

Table 4. Vehicle trips from the TRICS database for educational use.

The former education use is assessed as generating 41 am peak hour movements, 13 pm peak hour movements and 145 daily movements.

4.6 Crash Data

Crashmap indicates that there are no recorded crashes within the last five years along Downside or Moat Farm Road.

5. Proposed Development

5.1 Trip Generation

The proposed development is for Local Authority social housing and consists of 33 dwellings, six 1-bed flats, three 2-bed bungalows, 11 2-bed houses, 10 3-bed houses and three 4-bed houses.

The potential traffic generation from the development is based on typical trip rates from TRICS. Typical trip rates generated by residential development are shown in Table 5. Trip rates for housing vary depending on tenure and type.

Time	Typical Rates		Proposed Development Trips		
	Rate per flat	Rate per house	Flats (6)	Houses (27)	Total
AM peak hour	0.3	0.4	2	11	13
PM peak hour	0.3	0.5	2	14	16
Daily	3.0	4.0	18	108	126

Table 5. Typical trip rates from the TRICS database for housing development.

The proposed residential development is assessed as generating 13 am peak hour movements, 16 pm peak hour movements and 126 daily movements.

These movements are compared to potential trips generated by the educational use, Table 6.

Time	Education Use	Residential Use	Change
AM peak hour	41	13	-28
PM peak hour	13	16	+3
Daily	145	126	-19

Table 6. Comparison of vehicle trip generation.

The proposed residential use is assessed as generating fewer am peak hour and daily vehicle movements than the previous education use and comparable pm peak hour vehicle movements. The impact of the proposed development on the local road network is neutral in terms of vehicle trip generation.

6. Travel Plan

Kent County Council has published 'Guidance for Planning Officers on Transport Assessment and Travel Plans' (October 2008). The thresholds for producing a travel plan are 100 units for residential development.

Whilst a Travel Plan is not required under those criteria the following initiatives could be implemented as part of any development to limit the use of cars and promote more sustainable travel options;

- secure cycle storage will be provided for all dwellings;
- information on cycle routes, public footpaths, and local bus and rail services will form part of any home buyer's welcome pack;
- electric charging points could be provided for visitor parking; and
- broadband internet connections will facilitate home working.

7. Parking and Internal Layout

7.1 Car Parking

The proposed development will incorporate car parking in accordance with Kent Design Guide Review: Interim Guidance Note 3 (IGN3) on Residential Parking, published in November 2008.

The minimum parking standards based on a suburban location are shown in Table 7. Garage spaces are not considered to count towards the requirements of the guidance as garages are often used for storage. Open car ports or car barns are acceptable. Tandem parking is often underutilised and therefore additional provision should be allowed where tandem parking is proposed.

House/Flat	Spaces per unit	
	total	allocated
1/2 bed flat	1	0
2 bed house	1	1
3 bed house	1.5	1
4+ bed house	2	2

Table 7. Kent County Council minimum parking standards for a suburban location.

In addition, visitor parking is required at the rate of 0.2 spaces per unit. For 33 dwellings 7 visitor parking spaces are required.

The development provides six 1-bed flats, 14 2-bed dwellings, 10 3-bed dwellings and three 4-bed dwellings. The total number of spaces required for this mix of development is shown in Table 8.

House/Flat	Units	Spaces per unit	Spaces required
1/2 bed flat	6	1	6
2 bed house	14	1	14
3 bed house	10	1.5	15
4+ bed house	3	2	6
House Total	33	-	41
Visitor spaces	33	0.2	7
Space Total	-	-	48

Table 8. Development parking requirements.

A parking schedule is shown in Appendix A. The total number of spaces provided is summarised in Table 9. The layout of spaces is shown in Figure 12.

Type	Spaces
Allocated space	51
Unallocated space	6
Car barn	0
Visitor space	7
Total	64
Tandem space	0

Table 9. Parking spaces provided within the development.



Figure 12. Development parking layout.

Kent County Council recommended allocating two spaces per for each 2 and 3 bed dwelling to keep on street parking to a minimum. The majority of 2 and 3 bed houses have two allocated spaces. Site constraints mean that plots 19, 20 and 21 have one allocated parking space. In addition, the parking for the flats is within a courtyard adjacent to the flats and visitor parking has been distributed throughout the development as requested by Kent County Council.

The guidance requires a total of 48 parking spaces to be provided. The proposed development car parking follows the recommendations made by Kent County Council and provides 64 spaces. Car parking complies with IG3.

7.2 Cycle Parking

Kent County Council's advice is that secure, covered cycle parking should be provided at a minimum of one space per bedroom for houses and one space per flat. The parking should be independently accessible and at grade, i.e. cycles should not have to be carried through dwellings or up/down stairs.

For houses without a garage, cycle storage should be provided with rear access.

A secure cycle store is provided at ground floor level for the flats, providing six cycle parking spaces. Each dwelling has a cycle store/shed in the rear garden with external access via a side gate. This store has sufficient space to store two or three cycles depending on the number of bedrooms within the dwelling.

Cycle parking meets the requirements of Kent County Council.

7.3 Internal Layout

Access to the site will be via Downside and Moat Farm Road. Kent County Council has no safety issues concerning the access arrangements.

The proposed layout has been tracked for an 11.4 long refuse vehicle. There is sufficient space to access and turn within the proposed development. The swept path analysis is shown on drawing 35851/C/122 Vehicle Tracking.

8. Impact on the Transport Network and Compliance with Transport Policy

8.1 Impact on the Local Transport Network

Access to the site will be via Downside and Moat Farm Road. Kent County Council has no safety issues concerning the access arrangements.

The proposed residential use is assessed as generating fewer am peak hour and daily vehicle movements than the previous education use and comparable pm peak hour vehicle movements. The impact of the proposed development on the local road network is neutral in terms of vehicle trip generation.

The development is accessible to an 11.4m long refuse vehicle.

Paragraph 109 of the NPPF states that *Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*

The proposed development is considered to be neutral in terms of impact on the local transport network and is therefore acceptable under the NPPF.

8.2 Compliance with Transport Policy

The proposed development is considered alongside the requirements of national and local transport policy.

National Planning Policy Framework

Paragraph 108 of the NNP requires development to ensure that:

- *appropriate opportunities to promote sustainable transport modes can be - or have been - taken up, given the type of development and its location.*

The site benefits from footway connections to Park Farm Road and footpath connections to Park Farm Road and Black Bull Road. Local bus stops are within 400m of the site. Folkestone Central railway station is within 1,200m walk distance of the site. Mundella Primary School is within 400m walk distance of the site, Stella Maris Catholic Primary School and Beacon SEN School are within 800m as is the Lower Radnor Park Play Area. Radnor Park and Folkestone Sports Centre are within 1,200m walk distance of the site.

By bicycle, Folkestone Central railway station is accessible within 5 minutes. Folkestone town centre and Folkestone West railway station are accessible within 10 minutes. Folkestone and

Dover are accessible within 30 minutes of the site using public transport. Hythe and Ashford are accessible within 45 minutes. Canterbury is accessible within 60 minutes. These times include the time taken to walk from the site to the public transport node plus the journey time.

The analysis demonstrates that the site is in an accessible location and sustainable in terms of transport options.

- *safe and suitable access to the site can be achieved for all users;*

There are footways of both sides of Moat Farm Road and Downside linking to Park Farm Road. A footpath runs along the southern boundary of the site linking Park Farm Road to Downs Road and Black Bull Road. This footpath also links to Moat Farm Road.

The development is accessible to an 11.4m long refuse vehicle and benefits from an existing access.

- *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

The proposed residential use is assessed as generating fewer am peak hour and daily vehicle movements than the previous education use and comparable pm peak hour vehicle movements. The impact of the proposed development on the local road network is neutral in terms of vehicle trip generation.

Paragraph 109 states that *Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*

Kent County Council has no safety issues concerning the access arrangements. The development will not create an unacceptable impact on highway safety and the cumulative impacts on the road network will be neutral. The development is considered acceptable under the NPPF.

Local Transport Plan for Kent 2016-31

The site is within 400m of bus stops. Residents will be able to access local services by walking and district services by public transport. This promotes active travel choices to encourage good health and wellbeing in accordance with Outcome 5: Better health and wellbeing of Kent County Council's Local Transport Plan 4 2016-2031.

Shepway District Council Core Strategy Local Plan 2013

The development is considered to meet the policy requirements of the Local Plan 2013. The location encourages walking and sustainable transport in accordance with Policies SS3 and SS5. Cycle parking will be provided in accordance with Policy TR5. Pedestrian links are excellent and can be improved as part of the development in accordance with Policy TR6. The access is not detrimental to the safety of vehicle traffic, cyclists and pedestrians in accordance with Policy TR11. Off-street parking will be provided in accordance with the latest guidance in accordance with Policy TR12.

9. Conclusion

This Transport Statement has been commissioned to support a planning application for proposed development on land at the Former Highview School Site, Moat Farm Road, Folkestone, CT19 5DJ. Pre-application advice has been obtained from Kent County Council as Highway Authority and the development has been designed to reflect this advice.

The site is located off Moat Farm Road, Folkestone. The site is currently vacant but its former use was as a specialist school. The proposed development is for Local Authority social housing providing 33 dwellings.

The site benefits from footway connections to Park Farm Road and footpath connections to Park Farm Road and Black Bull Road. Local bus stops are within 400m of the site. Folkestone Central railway station is within 1,200m walk distance of the site. Mundella Primary School is within 400m walk distance of the site, Stella Maris Catholic Primary School and Beacon SEN School are within 800m as is the Lower Radnor Park Play Area. Radnor Park and Folkestone Sports Centre are within 1,200m walk distance of the site.

By bicycle, Folkestone Central railway station is accessible within 5 minutes. Folkestone town centre and Folkestone West railway station are accessible within 10 minutes. Folkestone and Dover are accessible within 30 minutes of the site using public transport. Hythe and Ashford are accessible within 45 minutes. Canterbury is accessible within 60 minutes. These times include the time taken to walk from the site to the public transport node plus the journey time.

The analysis demonstrates that the site is in an accessible location and sustainable in terms of transport options.

There are footways of both sides of Moat Farm Road and Downside linking to Park Farm Road. A footpath runs along the southern boundary of the site linking Park Farm Road to Downs Road and Black Bull Road. This footpath also links to Moat Farm Road.

The proposed residential use is assessed as generating fewer am peak hour and daily vehicle movements than the previous education use and comparable pm peak hour vehicle movements. The impact of the proposed development on the local road network is neutral in terms of vehicle trip generation.

The development is accessible to an 11.4m long refuse vehicle. Car parking is provided in accordance with IGN3. Cycle parking is provided in accordance with the requirements of Kent County Council.

Kent County Council has no safety issues concerning the access arrangements. The development will not create an unacceptable impact on highway safety and the cumulative impacts on the road network will be neutral.

Paragraph 109 states that *Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*

The development will not create an unacceptable impact on highway safety and the cumulative impacts on the road network will be neutral. The development is considered acceptable under the NPPF.

Appendix A - Parking Schedule

Highview, Moat Farm Road, Folkestone, CT19 5DJ

Parking Schedule

Plot	Space	Car barn	Tandem	Independantly Accessible	Unallocated	Visitor
1	2			2		
2	2			2		
3	2			2		
4	2			2		
5	2			2		
6	2			2		
7	2			2		
8	2			2		
9	2			2		
10	2			2		1
11	2			2		1
12	2			2		
13	2			2		
14	2			2		
15	2			2		1
16	2			2		1
17	2			2		
18	2			2		
19	1			1		
20	1			1		
21	1			1		
22	2			2		3
23	2			2		
24	2			2		
25	2			2		
26	2			2		
27	2			2		
28					1	
29					1	
30					1	
31					1	
32					1	
33					1	
TOTAL	51	0	0	51	6	7