# **CAPEL-LE-FERNE PARISH COUNCIL**

Clerk to the Council Maureen Leppard Website: <u>www.capel-le-</u> fernepc.kentparishes.gov.uk

14 February 2017

Kent County Council Planning Applications Group, First Floor, Invicta House, County Hall, Maidstone, Kent ME14 1XX



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Planning Case Officer: Mr Mike Clifton

#### Dear Mr Clifton

Please find attached comments as representation from Capel-le-Ferne Parish Council on the following application:

Application No: KCC/SH/0005/2017 (KCC/SH/0005/2017)

Applicant: J Taylor & Son

Location: Hope Farm, Crete Road East, Folkestone, CT18 7EG

<u>Proposal</u>: Extension to the existing Hope Farm Composting Facility along with the variation of conditions to planning permission reference SH/14/751 in respect of the inclusion of Bank Holiday deliveries of waste, removal of restriction on sources of material, increase in waste throughout, utilisation of processed material on other surrounding farms and increase in current restriction on vehicle movements

Capel-le-Ferne Parish Council are against this proposed application for the following reasons and with significant concerns over;

- What is meant by future proofing the consent by allowing flexibility in terms of materials permitted to be collected at this site?
- How much the increase hours of operation will be?
- Effect the additional traffic flow and movements will have to our village.
- Currently, condition (12) restricts green waste vehicle movements to a maximum of 84 movements per week. 18,000 Tonnes per annum, proposal is to increase to 35,000 tonnes double capacity. This will result in an increase in vehicle movements to and from the site. In a separate report (in support for the amendment) it identifies vehicle movements will increase from approximately 2,097 per annum to 2,842 per annum, using the same access road and with an increase in activity proposal on bank holidays, which does not stack with Kent County Council's numbers.

The concerns are not with the nature of the business but the Highway Safety and Traffic Accidents: It is not safe to increase the traffic volumes or increase vehicle movements on the B2011 and through the village, together with the access/egress of vehicles onto the B2011.

There have been 4 road traffic accidents within 500m of the site access in the last 8 months, 3 serious. (Evidence detailed attached).

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At the access point to Hope Farm, the B2011 is a single carriageway with no 'turn right' lane at the access point, this causes congestion at busy times. This section of the B2011 has street lamps but with Kent County Council's current street lighting policy, these are not lit.

Because of the height above sea level, Capel-le-Ferne is frequently prone to fog. Therefore the combination of increased traffic accessing/egressing the site together with no right turn lane, no street lighting and frequent poor visibility on a section of road at the National Speed Limit, the increased risk of accidents is inevitable.

The traffic assessment document does not seem to take into account tractor/trailer movements when the composted material is moved from Hope Farm to a storage area accessed from Crete Road East. This can mean up to 56 movements a day (28out/28return) on the B2011.

Consideration must be given to:

- A right hand turn lane at the site entrance
- Moving the 40mph speed limit to the Folkestone side of the site entrance.
- Appropriate signage warning motorist of vehicles including tractors accessing/egressing the site

#### **Evidence:**

#### 1) Traffic Volumes

The B2011 is a well-known local short cut between Dover and Folkestone and volumes are well above those which would normally be expected on a B road. Additionally, it is used as the diversion route for the A20. The result is that the traffic volumes on a B road are much higher than would be expected on a minor rural road. The traffic assessment report indicated the traffic volumes as being an average 10,243, of which 1,338 were HGV per day. The Department of Transport's Road Traffic Estimate Great Britain 2015 quotes average traffic volumes for a minor road at 900 per day, and those for a rural A road as being 1,130 per day.

The proposal will increase traffic volumes by more than the additional HVGs travelling to/from the site. Currently the compost is moved by tractor and trailed along the B2011. The proposal states that the increased production will be used over a wide area. This therefore means that there will be additional farm traffic.

In response to increased visitors by car, the local tourist attraction the Battle of Britain Memorial Trust Site, has applied for permission to considerably increase its car park. Traffic volumes will also increase as a result of the housing development at the other end of the B2011.

Despite volumes being as high as a rural A road, the B2011 is not as well maintained as an A road.

### 2) Pedestrian Safety

The traffic assessment plan indicates an average speed of about 53 mph however, a significant number of vehicles were travelling in excess of 60mph. Whilst acknowledging that this area is national speed limit, it MUST be put into context – local residents and visitors have to cross this road to use the bus service. Crossing a road when the traffic rounds the corner at 65 mph is no joke! The area is part of the North Down Way and there are many walkers, (including the Armed Forces Cadets).

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## 3) Road Accidents

Contrary to the Traffic Assessment, New Dover Road does NOT have street lighting.

The data supplied relating to road incidents are out of date. In addition to the accidents contained in the traffic assessment there has been:

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14th July 2015	Serious crash 1 car & 2 motorcyclists. Bike collided with a car. 2
	motorcyclists to hospital. Happened near Courtwood Roundabout.
	Lower limb amputation(s). Happened near Courtwood Roundabout. Lower
	limb amputation(s). Airlifted from scene. More information not known.
6th February 2016	Car and minibus towing a car trailer collide head on. 8 people badly injured.
	Happened New Dover Road at 1am.
27 <sup>th</sup> August 2016	Cyclist on Dover Hill has accident, airlifted from scene. More information
C C	not known.
8th September 2016	Fatal accident moped rider collided with stationary truck. Sun was low and
_	probable he was dazzled by the sun. Happened next to junction at Winehouse
	Lane at 6.55am.
12th October 2016	Two vans crash head on at 11.56am minor injuries.
20th December 2016	2 Lorries crash at 11.20pm. 1 man injured.
23rd December 2016	Double decker bus collides with car and smashes into wall of the valiant sailor
	at 2.30pm. Serious injuries, 1 patient airlifted to Kings, patient still in hospital.
	Car engine through houses brick wall.
5th January 2017	Double lorry crash at 2.17pm.
10th January 2017	2 car crash 1 to hospital. Happened new dover road at 3.34pm (already getting
5	dark at this time). Post was damaged on central island and car needed to be
	recovered.
27 <sup>th</sup> January 2017	At approx. 0900. Travelling on New Dover Road from Capel towards Dover
	and the other driver came out of Winehouse Ln (from Satmar Caravan Park)
	and he just didn't see me and pulled out straight in front of me. The collision
	was at about 40mph as I managed to break (a bit). His car was written off and
	mine is still in for assessment. He did not suffer any injuries and I as per
	above is in pain with my back and neck. I don't think there were any issues
	with visibility he just didn't look when he pulled out.
13 <sup>th</sup> February 2017	Car pulled out from Avondale/Helena Road onto B2011 into path of
15 1°C01uary 2017	oncoming vehicle. Driver Ok. Debris strewn across road. Police arrived,
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	swept up and left the chunky debris on the side.

Yours sincerely

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Maureen Leppard Parish Clerk to Capel-le-Ferne Parish Council