

THE FLOUR MILL, EAST HILL, ASHFORD, KENT TN24 8PA

TRANSPORT STATEMENT



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TRANSPORT STATEMENT ON BEHALF OF MULBERRY TREE HOLDINGS LTD

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December 2021



TRANSPORT STATEMENT

DOCUMENT CONTROL SHEET

Project Name The Flour Mill, East Hill, Ashford, Kent

Project No. 21145

Rev	Issue Purpose	Author	Checked	Reviewed	Approved	Date
-	First Draft	DJ	TN	DJ	MJB	Aug. 21
Α	For Submission	DJ	TN	DJ	MJB	Dec. 21



TRANSPORT STATEMENT

CON	ITENTS						
1.0	INTROE	DUCTION	1				
2.0	TRANSI	PORT PLANNING POLICY	3				
3.0	EXISTING CONDITIONS AND SUSTAINABLE TRANSPORT						
4.0	PROPOSED DEVELOPMENT 1						
5.0	TRIP GI	ENERATION	19				
6.0	6.0 SUMMARY AND CONCLUSION						
FIGU	JRES						
Figure 1		Site Location Plan					
Figure 2		Local Facilities Plan					
Figu	re 3	Public Transport Accessibility Plan					
Figure 4 Local Cycle Routes Plan		Local Cycle Routes Plan					
DRA	WINGS						
21-1	45-001	Proposed Traffic Calming Arrangement on East Hill					
21-1	45-005	Swept Path Analysis – Refuse Vehicle					
21-1	45-006	Swept Path Analysis – 7.5t Box Van Delivery Vehicle					
21-145-007		Swept Path Analysis – Medium Car					



TRANSPORT STATEMENT

APPENDICES

Appendix A Site Layout Plan

Appendix B Pre-application Advice

Appendix C TRICS Outputs



1.0 INTRODUCTION

1.1 General

- 1.1.1 This Transport Statement (TS) has been prepared by Odyssey on behalf of Mulberry Tree Holdings Ltd to accompany a planning application relating to a proposed residential development at the former 'Pledges' The Flour Mill, in East Hill, Ashford, Kent. This report examines highways and transport matters associated with the scheme.
- 1.1.2 The site is located within the administrative boundary of Ashford Borough Council (ABC) who act as the Local Planning Authority, and Kent County Council (KCC) who act as the Local Highway Authority. A site location plan is provided at **Figure 1**.
- 1.1.3 The site currently comprises the Flour Mill, which is vacant, and was most recently used as a nightclub with some residential use on upper levels. The description of development is as follows:

'Redevelopment comprising the conversion of the existing Flour Mill, demolition of existing structures, and the erection of four ancillary blocks to provide a total of no. 53 apartments (Use Class C3), ancillary residential facilities (including residents' gym and 'superlounge'), 1 x office (Use Class E(g)(i)), retained access from East Hill, parking, and associated landscaping and infrastructure.'

1.1.4 This TS has been produced following pre-application advice from ABC. The primary highways and transport issue identified within the pre-application advice is the potential loss of the on-site car park, which is currently utilised by ABC market traders, in addition to members of staff for the Ashford School, which is also located on East Hill. The pre-application advice also outlined the need to produce a Travel Plan, which has also been produced by Odyssey. The pre-application advice is included within **Appendix B**.

1.2 Scope of Assessment

1.2.1 This TS assesses the suitability of the proposals in the context of transport matters including access, parking, public transport accessibility and the ease of access to key local facilities. The TS identifies the expected trip generation of the development across various transport modes and considers the potential effect of the proposals on the surrounding highway and public transport networks.



TRANSPORT STATEMENT

1.2.2 The remainder of this TS is set out as follows:

- Section 2.0 considers national and local policy.
- **Section 3.0** reviews the existing highway and public transport networks in the vicinity of the site.
- **Section 4.0** provides a description of the development proposals and outlines the proposed access, parking, delivery and servicing arrangements.
- Section 5.0 provides an analysis of the estimated development trips.
- Section 6.0 provides a summary and concludes the TS.



2.0 TRANSPORT PLANNING POLICY

2.1 General

2.1.1 This section sets out national, regional and local transport planning policy relevant to the design and delivery of the development proposals.

2.2 National Policy

National Planning Policy Framework (NPPF) - July 2021

- 2.2.1 The National Planning Policy Framework (NPPF), first published in March 2012 and most recently updated in July 2021, provides a structure for development within the UK, with a presumption in favour of sustainable development and the promotion of economic growth.
- 2.2.2 The National Planning Policy Framework sets out in paragraph 110 that:

"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."
- 2.2.3 Paragraphs 111 to 113 of the NPPF state that:
- 111. "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.
- 112. 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 STATEMENT

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.
- 113. 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."

2.3 Local Policy

- 2.3.1 Kent County Council is the highway authority for the area, with Ashford Borough Council including detail of expected transport and highways related policies within their planning policy. The Core Strategy sets out the Ashford Borough Council vision, aims and objectives which would determine the future pattern of development in the Borough up until 2030.
- 2.3.2 The Ashford Local Plan was adopted in February 2019 and covers the period between 2011 to 2030. The adopted Local Plan supersedes the earlier Ashford Core Strategy 2008. Chapter 8 'Transport' sets out policies to ensure a sustainable transport network is delivered and maintained in the borough.
- 2.3.3 Policy TRA3 (a) 'Parking standards for residential development', sets out the minimum car parking standards for new residential developments. Parking should be provided at one space per unit for sites located within town centres. Visitor parking should be provided on-site at 0.2 spaces per dwelling.
- 2.3.4 Policy TRA3 (b) sets out the car parking standards for non-residential use. Parking standards for office use are one space per 20 square metres (sqm) (up to 500sqm total floor space). In addition, one space per two staff should also be provided.



TRANSPORT STATEMENT

- 2.3.5 Policy TRA6 'Provision for Cycling' outlines the minimum cycle parking standards for new developments. It states that 'it is expected that sufficient accommodation would be provided in any case for houses.' Covered cycle parking would be provided in garages or car barns for those units which have them. Sheds would be provided in the rear gardens of those units without car barns or garages for cycle parking. It also states the Council would seek to improve conditions for cyclists through the following measures:
 - Promoting and developing a Borough-wide network of cycle routes.
 - Developments should, where opportunities arise, include safe, convenient and attractively designed cycle routes, including, where possible, connection to the Boroughwide cycle network.
 - Promoting and providing cycle parking facilities in town centres, at railway stations and at major public buildings, and requiring new development to provide cycle parking facilities in agreement with the Council.
 - Taking opportunities to consider active travel when designing new routes and establishing connections with existing routes, encouraging journeys by bicycle.
- 2.3.6 Policy TRA8 'Travel Plans, Assessments and Statements' outlines that planning applications should be supported by either a Transport Statement, or a Transport Assessment depending on the nature and scale of the proposal and the level of significant transport movements generated. Where appropriate, it is noted that the Council would liaise with the relevant highway authority in relation to the level of evidence is required. The recommendations of these studies, including Travel Plans, would be required to be delivered prior to or as part of the development and would be secured through either a condition or S106 agreement.

2.4 Planning Policy Summary

2.4.1 Based on the above policy reviewed in this TS, it is concluded that the site, its proposed land use, and the design proposals would be broadly compliant with the relevant planning policies.



3.0 EXISTING CONDITIONS AND SUSTAINABLE TRANSPORT

3.1 Preamble

- 3.1.1 The site currently comprises the 'Pledges' Flour Mill, which is a 5-7 storey former mill, which has had various uses and was most recently used as a nightclub with some residential use. As of 2013, the site has been vacant, with the exception of the adjacent car park, which is predominantly used by ABC market traders and some staff who work at Ashford School.
- 3.1.2 The existing car park has a total of 51 parking spaces, of which seven spaces are allocated to Ashford School members of staff. The remaining spaces are informally used by ABC market traders (circa three to seven vans on market days), ABC staff and occasionally, local residents.
- 3.1.3 As part of the pre-application advice received from ABC, the Council confirmed that use of the existing car park at the Flour Mills site for Council staff was not required, as staff were able to also park at the Civic Centre. However, the Council also advised that the shift towards home working as a result of the Covid-19 pandemic, would further negate the need for Council staff to utilise car parking spaces at the Civic Centre.

3.2 Site Location

- 3.2.1 The site is bounded by East Hill to the north-west of the site, Mace Lane to the north-east and Mill Court to the east. The site is bisected by the River Stour (East Stour), which divides the site boundary into two distinct parts. The south of the site is bound by land which has been acquired by the client from ABC.
- 3.2.2 The site's surrounding location comprises various uses, with Ashford School and associated land located to the north-west, The Star Inn East Hill located directly to the south-west and the Mill Court residential development, which contains various amenities including a medical centre, pharmacy and convenience store, located directly to the south-east of the site.
- 3.2.3 Beyond the immediate vicinity of the site, the local area is predominantly residential and commercial in nature. A site layout plan is included at **Appendix A** and a location plan at **Figure 1**.

3.3 Local Highway Network

3.3.1 For additional context and information, a qualitative description of the local highway network is presented in this section, which provides a summary of the existing highway network and its local characteristics.



TRANSPORT STATEMENT

A292 Mace Lane

- 3.3.2 The A292 Mace Lane is a two-way, dual carriageway road, which is orientated in a broadly east to west alignment. Mace Lane is a primary road, which provides a route through Ashford and other settlements. The eastbound and westbound carriageways are separated by a grass verge adjacent to Mace Lane's priority junction with East Hill.
- 3.3.3 At approximately 50 metres (m) to the south-east of Mace Lane's priority junction with East Hill, Mace Lane forms a roundabout junction with Mill Court, which routes to the south-west, and Henwood, which routes to the north-east. Beyond this roundabout junction, Mace Lane becomes the A292 Hythe Road. Further to the south-east A292 Hythe Road merges with the M20, which provides access to Folkestone to the south-east and Maidstone to the north-west.
- 3.3.4 At approximately 600m to the north-west of Mace Lane's priority junction with East Hill, A292 Mace Lane becomes Somerset Road. Somerset Road provides access into other locations within Ashford, and access onto the A28 access road which connects Ashford to Junction 9 of the M20 to the north-west.
- 3.3.5 Mace Lane has a signalised crossing located within 70m to the east of its priority junction with East Hill, therefore allowing pedestrians to access the footway to the north.
- 3.3.6 **Photographs 3.1** and **3.2**, show Mace Lane in the vicinity of the site, with views to the east and west respectively.



Photograph 3.1: View of A292 Mace Lane to the West of its priority junction with East Hill



Photograph 3.2: View of A292 Mace Lane to the East of its priority junction with East Hill





TRANSPORT STATEMENT

East Hill

- 3.3.7 East Hill is a two-way, single carriageway, access road, which is orientated in a broadly north-east to west alignment. East Hill forms a priority junction with A292 Mace Road to the north, which in turn, provides access to the M20 to the south-east and access towards other locations in Ashford further to the west. East Hill has bollards at its western extent, which prevent vehicular access High Street beyond this point. Pedestrian access can be obtained from the western extent of East Hill onto A2042 Wellesley Road and retail facilities in the centre of Ashford.
- 3.3.8 East Hill has parking restrictions (double yellow lines) in place throughout the majority of its length and has a 'No Through Road for Vehicles' information sign located as vehicles approach East Hill from its priority junction with A292 Mace Lane. East Hill has a carriageway width of circa 6.5m.
- 3.3.9 East Hill has two crossovers in place to the east, which provide access to a total of five car parking spaces, which form part of the on-site parking provision.
- 3.3.10 East Hill also includes an access road, which provides a southern access (refectory access) into Ashford School.
- 3.3.11 **Photographs 3.3** and **3.4**, show East Hill in the vicinity of the site, with views to the north and south respectively. The Flour Mill site is located to the east and Ashford School is situated to the west.



Photograph 3.3: View of East Hill Approaching A292 Mace Lane Southbound (Site to the East)



Photograph 3.4: View of East Hill from A292 Mace Lane Northbound (Site to the East)





3.4 Highway Safety

- 3.4.1 A Crashmap assessment of the site has been undertaken for the most recent five years up to December 2020. The assessment identified no serious or fatal accidents in the immediate vicinity of the site, with a single 'slight' accident occurring on Mace Lane, 10m to the west of its junction with East Hill, and two slight accidents on East Hill adjacent to the Star Inn East Hill. Two slight accidents were also identified at Mace Lane's roundabout junction with Henwood and Mill Court, with one further slight accident occurring towards the Henwood arm approach and the other towards the Mill Court approach.
- 3.4.2 It is noted that as only one collision occurred in 2020, with the other five occurring in 2018 and 2019, there is no correlation which suggests any increase in collisions.

3.5 Local Facilities

- 3.5.1 Several key facilities are accessible within walking distance of the site. These include retail opportunities, food and café provision and services that would be used by future residents, such as local educational facilities. The facilities located in proximity to the site are presented in **Figure 2**.
- 3.5.2 **Table 3.1** lists local key facilities and the respective walking distance and time to each.

Table 3.1: Local Facilities

Facility	Walking Distance	Walking Time
The Star Inn East Hill	90m	1 minute
Mace Lane Bus Stop (Eastbound)	80m	1 minute
Mace Lane Bus Stop (Westbound)	120m	2 minutes
Ashford School	250m	4 minutes
Ashford Fire Station	350m	5 minutes
Ashford Post Office	450m	5 minutes
Sydenham House Medical Centre	400m	5 minutes
Tesco Express	450m	5 minutes
Ashford International Train Station	750m	9 minutes

3.6 Access to Public Transport

3.6.1 This section of the TS details sustainable public transport options available within walking distance of the site, including bus and rail services. **Figure 3** shows a map of the local public transport network in the vicinity of the site.



Bus

- 3.6.2 The nearest bus stops are located to the north of the site on Mace Lane, with the westbound stop situated approximately 120m walk from the site, and the eastbound stop situated approximately 80m from the site. These bus stops serve several bus routes, including 1, 2, 2A, 10, 10A, 10X, 11, 11A, 1SS, 18A, 111, 123, 124, 125, 516, 518, 666, 925, AS2, AS3, C, RJ1 and WS2. The aforementioned bus routes provide numerous services to other locations in Kent including Canterbury, Tenterden, Faversham and Folkestone.
- 3.6.3 Details of the main bus routes and destinations accessible from these stops are given in **Table 3.2**.

Table 3.2: Local Bus Services

Service	Route	Weekday Frequency
1/1A/1X	Ashford - Canterbury	c.Ten services per day
2/2A	Ashford – Tenterden & Rolvenden	Every two hours
10	Folkestone - Ashford	Every hour
11/11A	Ashford – Lydd & New Romney	Every hour
18A	Ashford - Canterbury	Every two hours
111 (Thursday Only)	Ashford – Folkestone	One per day
123	Ashford - Biddenden	c. Four services per day
124 (School Services)	Egerton – Hythe Road School	c. Two services per day
125	Ashford – Aldington - Ashford	c. Five services per day
516 (School Service)	Towers School – Ashford - Willesborough	One Service
518 (School Service)	Ashford Hythe Road Schools - Tenterden	One Service
666	Ashford - Faversham	c. Ten Services per day

National Rail Services

3.6.4 Ashford International Railway Station is located approximately 750m walking distance to the south of the site, which is approximately a nine-minute walk. Ashford International Station is also accessible via the number 1 and 2 bus routes, which can be accessed from the bus tops located on Mace Lane. Ashford International Station is managed by National Rail, with both Southeastern and Southern trains serving the station.



- 3.6.5 Ashford International Station also has Eurostar services; however, it is understood as a result of the COVID-19 pandemic, there will be no Eurostar services from Ashford International Station until at least 2022.
- 3.6.6 Ashford International Station affords step-free access to all users and has bicycle and car parking provision available at the station. 454 sheltered cycle spaces are situated adjacent to the bus stop in front of the station and a total of 135 car parking spaces are available at a daily charge of £8.30, with an off-peak rate of £7.50.
- 3.6.7 Ashford International Station also has 15 accessible car parking spaces available, which are free of charge for blue badge holders. A taxi rank is located to the front of Ashford International Station on Station Approach Road, with accessible taxis available to book on request.
- 3.6.8 Typical weekday off-peak services from Ashford International Railway Station are as follows:
 - 2 trains per hour to London St Pancras International (fast service via High Speed 1);
 - 1 train per hour to London St Pancras International via Dover Priory, Ramsgate and Faversham;
 - 2 trains per hour to London Charing Cross via Tonbridge;
 - 2 trains per hour to London Victoria via Maidstone East;
 - 1 train per hour to Dover Priory;
 - 1 train per hour to Canterbury West;
 - 1 train per hour to Eastbourne via Hastings
 - 1 train per hour to Ramsgate via Canterbury West; and
 - 1 train per hour to Margate via Canterbury West.

3.7 Active Travel Accessibility

Walking

- 3.7.1 Within the National Travel Survey (2019), it has been identified that 31 minutes is the average length of a commuting trip in England. Of all "journey to work" trips, it is noted that 39% are made by non-car/van modes of transport (with walking making up 12% and local buses making up 8% of trips.
- 3.7.2 At an average walking speed of three miles per hour (mph) or 80 metres (m) per minute, and a novice cycling speed of 10mph, it is estimated that walking and cycling trips could therefore be made within 1.5 miles (2.5km) for walking, and five miles (8km) for cycling.



TRANSPORT STATEMENT

- 3.7.3 Mace Lane, East Hill and the surrounding roads facilitate access on foot from the site into Ashford town centre and its amenities. The route to Ashford is a generally well-maintained and accessible pedestrian environment. Footways are present on both sides of East Hill and Mace Lane to aid pedestrian movement, and dropped kerbs are present at minor junctions.
- 3.7.4 Key routes in the vicinity of the site, such as those to Ashford town centre, are of good quality and are conducive to travel by foot. The footway network also enables convenient pedestrian movement to and from nearby transport connections.

Cycling

- 3.7.5 It is noted from guidance outlined by the Department for Transport (DfT) that most cycling trips are for short distances, with 80% being under five miles and approximately 40% being less than two miles. However, it should be noted that most trips, by all modes, are also short distances (67% are less than five miles, and 38% are less than two miles). Therefore, the bicycle is a potential mode for many of these trips (DfT, 2014a).
- 3.7.6 Electric bicycles extend the range that can be cycled comfortably, and combined cycle-rail or cycle-bus journeys could offer an alternative to car travel for many longer trips.
- 3.7.7 Additionally, many of the residential roads in the vicinity of the site are suitable for cycling, due to their low-speed limits and relatively shallow gradients. It is outlined in **Figure 4**, which shows local cycle routes, that Mill Court adjacent to the site is suitable for cycling and largely follows the East Stour River. This would provide access from the site towards Ashford International Train Station via Newtown Road.



4.0 PROPOSED DEVELOPMENT

4.1 Overview

4.1.1 This section outlines details of how the site would be developed and accessed, along with providing details of the associated proposed cycle and car parking facilities.

4.2 Development Proposals

- 4.2.1 The development proposals considered in this TS comprise the redevelopment of the site to provide 53 residential units including a residents' gym and a 'superlounge' and 123sqm of office use. A proposed site layout plan is attached at **Appendix A**.
- 4.2.2 The schedule of residential accommodation comprises the following:
 - 3 x studio units;
 - 21 x one-bedroom units;
 - 27 x two-bedroom units; and,
 - 2 x three-bed units.

4.3 Access Arrangements

- 4.3.1 Vehicular access into the Flour Mill site is currently taken from East Hill via an access road, which is located at approximately 68m to the south of East Hill's priority junction with A292 Mace Lane. The existing access arrangement in the form of an all-movements simple priority junction with East Hill is to remain the same following the redevelopment to residential use, as can be seen in **Drawing 21-145-001**.
- 4.3.2 The vehicular access has visibility of 43m in either direction, which is compliant with the 30mph speed limit in place on East Hill. Visibility splays are shown on **Drawing 21-145-001**.
- 4.3.3 It is proposed that the pedestrian access would be located approximately 10m to the north of the vehicular access road via a separate pedestrian only access point directly from East Hill.
- 4.3.4 Following pre-application advice from ABC (included within **Appendix B**), a traffic calming measure is proposed to slow down oncoming vehicles approaching the site on East Hill by the proposed site access. The traffic calming proposals are included within **Drawing 21-145-001**.



4.3.5 The proposed build-out would locally narrow the width of East Hill to 3.7m, which would be adequate for single-file traffic, including larger vehicles such as refuse vehicles. The kerbed build-out would prevent two cars from passing each other as a result of traffic bollards being in place, thereby creating a shuttle priority arrangement, to reduce prevailing traffic speeds on East Hill.

4.4 Parking Arrangements

Parking Arrangements – Vehicular

4.4.1 ABC's adopted car parking standards for residential and office uses are set out in **Table 4.1**Table 4.1: Cycle Parking Standards

Table 4.1: Car Parking Standards

	Cycle Parking Standards
Residential	- 1 space per unit
Office	 1 space per 20sqm of office floorspace
Office	plus 1 space per 2 members of staff

- 4.4.2 It is proposed that the site would provide a total of 54 car parking spaces, of which two would be disabled spaces. Three of the 54 bays would be bays dedicated for visitors. Seven spaces located adjacent to the site's frontage with East Hill, would be retained for the use of staff at Ashford School.
- 4.4.3 Four spaces would be provided for the proposed office use with 43 car parking spaces (including the visitor and disabled spaces), available for the proposed residential use.
- 4.4.4 Whilst the above provision of car parking is slightly below ABC's adopted standards for town centre development, it is considered that the proposed car parking provision would be sufficient owing to the site's good sustainable transport links and access to local amenities.
- 4.4.5 It is noted that ABC's adopted parking policy includes a provision which states that in exceptional cases, proposals may deviate from the standards in Polices TRA3 (a) or (b), if any of the following apply:

16

- The specific circumstances of the site may require a lower level of parking provision including the sites accessibility to public transport.
- To ensure the restoration or refurbishment of listed buildings or buildings affecting the character of a conservation area.



- To allow the appropriate re-use of the upper floors of buildings in town centres or above shop units.
- 4.4.6 The pre-application advice outlined that a reduction in car parking ratio, from one space per unit in town centre sites, would not result in an objection from ABC Officers. Furthermore, the loss of the existing car parking currently used by ABC Council employees is not considered to be detrimental given the site's proximity to sustainable modes of transport. In addition, and as described above, parking for seven staff at Ashford School would be retained along the site frontage.
- 4.4.7 **Drawing 21-145-007** has been prepared to show the swept path analysis of a medium car accessing and egressing various car parking spaces on the site.

Parking Arrangements - Cycle

4.4.8 Cycle parking spaces would be provided within the development in accordance with Ashford Borough Council requirements, as outlined in **Table 4.1** below. It is noted that ABC's adopted Local Plan 2030 (2019) has updated the standards that are outlined in the ABC's *Adopted Residential Parking & Design Guidance SPD* (2010).

Table 4.1: Cycle Parking Standards

	Cycle Parking Standards
Residential	- 1 space per unit
Office	1 space per 1,000sqm for short-medium spaces1 space per 200sqm for medium-long stay spaces

- 4.4.9 The cycle parking standards show that for a development of this size, a total of 55 cycle parking spaces should be provided. However, the applicant proposes to provide 90 cycle parking spaces on the site.
- 4.4.10 The residential use cycle spaces would be provided internally at ground floor level, in a secure bicycle store. The two office use cycle spaces (one Sheffield stand) would be provided adjacent to the front entrance of the office. Cycle parking provision is shown on the ground floor plan at **Appendix A**.

4.5 Deliveries, Servicing and Refuse Collection

4.5.1 Similarly, it is anticipated that delivery and servicing trips would be undertaken using the proposed site access on East Hill and the dedicated delivery and servicing bay as shown on **Drawing 21-145-006.** All such vehicles would be able to enter and exit the site in forward gear.



TRANSPORT STATEMENT

- 4.5.2 Waste for the residential and office uses would be stored in separate bin stores with the residential waste/ recycling to be collected by a Council operated waste collection. A private waste collection would serve the office use.
- 4.5.3 Waste would be stored in a refuse and recycling store close to the residential and office accesses, as shown on the site plans located within **Appendix A**. The residential bin store would be within a 10m drag distance for waste operatives of a 11.3m Council operated refuse vehicle.
- 4.5.4 **Drawing 21-145-005** provides a swept path analysis of a Council operated 11.2m refuse vehicle. The drawing demonstrates that the layout is suitable for a refuse vehicle to access and egress the site in a forward gear.



5.0 TRIP GENERATION

5.1 General

5.1.1 This section investigates the trip generation potential of the proposed 53 residential units and considers its impact on the local transport network. Although the extant use of the site is a nightclub, this use has not been in operation since 2013, therefore, the development has been classified as vacant for the purpose of this trip generation assessment. The trips generated by the 53 residential units are therefore deemed to be newly generated trips.

5.2 Trip Generation – Proposed Residential Units

- 5.2.1 Trip rates used to derive the quantum of residential trips for the proposed new units were extracted from the TRICS trip rate database. Trip rates were selected from comparable sites of privately-owned apartments located in England (excluding Greater London sites), with consideration given to location, type, and parking ratio. The full TRICS outputs are included within **Appendix C**.
- 5.2.2 Derived residential (apartments privately owned) trip rates by mode are shown in **Table 5.1**. Application of these trip rates to the proposed 53 residential units would result in the estimated number of trips for the site as outlined within **Table 5.2**.

Table 5.1: Residential Trip Rates (Per Dwelling) – Privately Owned Apartments

Mode of	AM Peak Hour (08:00 – 09:00)		PM Peak Hour (17:00 – 18:00)		Daily Trips (07:00 – 19:00)	
Travel -	In	Out	In	Out	In	Out
Vehicles	0.057	0.234	0.197	0.119	1.607	1.652
Cyclists	0.000	0.004	0.000	0.000	0.028	0.028
Pedestrians	0.041	0.184	0.111	0.074	0.852	0.912
Bus	0.004	0.086	0.045	0.004	0.162	0.155
Rail	0.000	0.004	0.012	0.000	0.028	0.024
Taxis	0.000	0.004	0.004	0.000	0.048	0.048
OGVs	0.000	0.000	0.000	0.000	0.012	0.012



Table 5.2: Residential Trips – Applied to 53 Privately Owned Apartments

Mode of		ak Hour – 09:00)	PM Peak Hour (17:00 – 18:00)		Daily Trips (07:00 – 19:00)	
Travel —	In	Out	In	Out	In	Out
Vehicles	3	12	10	6	85	88
Cyclists	0	0	0	0	1	1
Pedestrians	2	10	6	4	45	48
Bus	0	5	2	0	9	8
Rail	0	0	1	0	1	1
Taxis	0	0	0	0	3	3
OGVs	0	0	0	0	1	1

5.2.3 Based on the results of the above exercise, the proposed 53 residential units are estimated to generate 15 vehicle trips during the AM peak hour and 16 during the PM peak hour, with an estimated total of 173 vehicle trips daily. A reasonable proportion of trips are expected to take place via sustainable modes such as walking and using public transport, as is detailed in the sections below.

5.3 Trip Generation – Proposed Residential Units

- 5.3.1 Trip rates used to derive the trips for the proposed office element was extracted from the TRICS trip rate database. Trip rates were selected from comparable office sites located in England (excluding Greater London sites), with consideration given to location, type, and parking ratio. The full TRICS outputs are included within **Appendix C**.
- 5.3.2 Derived office trip rates by mode are shown in **Table 5.3**. Application of these trip rates to the proposed 123sqm (NIA) of office space would result in the estimated number of trips for the site as outlined within **Table 5.4**.

Table 5.3: Office Trip Rates (Per SQM)

Mode of	AM Peak Hour (08:00 – 09:00)		PM Peak Hour (17:00 – 18:00)		Daily Trips (07:00 – 19:00)	
Travel -	In	Out	In	Out	In	Out
Vehicles	3.759	0.350	0.175	3.059	14.793	14.798
Cyclists	0.262	0.000	0.000	0.000	1.065	0.961
Pedestrians	0.874	0.000	0.000	0.437	7.079	7.535
Bus	0.437	0.000	0.000	0.262	1.415	1.310
Rail	0.175	0.000	0.000	0.087	0.175	0.191
Taxis	0.000	0.000	0.000	0.000	0.191	0.191
OGVs	0.000	0.000	0.000	0.000	0.262	0.262

20



Table 5.4: Office Trips – Applied to 123sqm Office

Mode of		ak Hour – 09:00)		Peak Hour Daily : :00 – 18:00) (07:00 –			
Travel -	In	Out	In	Out	In	Out	
Vehicles	5	0	0	4	18	18	
Cyclists	0	0	0	0	1	1	
Pedestrians	1	0	0	1	9	9	
Bus	1	0	0	0	2	2	
Rail	0	0	0	0	0	0	
Taxis	0	0	0	0	0	0	
OGVs	0	0	0	0	0	0	

5.3.3 Based on the results of the above exercise, the proposed office unit is estimated to generate five vehicle trips during the AM peak hour and four during the PM peak hour, with an estimated total of 36 vehicle trips daily. A reasonable proportion of trips are expected to take place via sustainable modes such as walking and using public transport, as is detailed in the sections below.

5.4 Net Trips

5.4.1 **Table 5.5** located below combines the residential and office trips to provide the total trips that the site would be expected to generate.

Table 5.5: Total Trips – Residential and Office Uses

Mode of		ak Hour – 09:00)	PM Peak Hour (17:00 – 18:00)		Daily Trips (07:00 – 19:00)	
Travel -	In	Out	In	Out	In	Out
Vehicles	8	12	10	10	103	106
Cyclists	0	0	0	0	2	2
Pedestrians	3	10	6	5	54	57
Bus	1	5	2	0	11	10
Rail	0	0	1	0	1	1
Taxis	0	0	0	0	3	3
OGVs	0	0	0	0	1	1

5.4.2 Whilst the site would inevitably generate new trips when compared to the site's current vacant use, it is noted that the newly generated trips would not have a significant impact on East Hill during the network peak hours. The 20 additional vehicle trips during the AM peak hour, would equate to an additional trip every three minutes, which would not be noticeable on the wider highway network and would not have a significant effect on the existing school trips during the AM period. The PM peak hour (17:00-18:00), would not coincide with school leaving time circa 15:00-16:00.

21



5.5 Impact on the Pedestrian Network

5.5.1 The pedestrian infrastructure in the vicinity of the site is of good quality and enables access into Ashford town centre and to associated amenities. It is estimated that over the surveyed period (07:00-19:00), there would be 111 pedestrian trips as is outlined within **Table 5.2**. The footway network is considered capable of accommodating the relatively small number of additional pedestrian trips at no detriment.

5.6 Impact on the Cycle Network

5.6.1 No detrimental impact to the local cycle network is anticipated, as the site is expected at first glance to generate relatively few additional cycle trips (four two-way cycle trips) in total as outlined within **Table 5.2**. It would however be the job of the Travel Plan associated with the proposed development to increase the take up of cycling by those living at the new development.

5.7 Impact on the Public Transport Network

5.7.1 The proposed development would likely to lead to an increase of circa 23 trips on the local public transport network throughout the surveyed daily period (07:00-19:00) as outlined within **Table 5.2**. This relatively low level of additional trips is not expected to cause capacity issues on the local bus/rail networks, as the trips would be spread across multiple modes, stops/stations and services. As with cycle usage, it would be the aim of the Travel Plan to increase rail and bus use over time at the expense of the forecast use of the private car.



6.0 SUMMARY AND CONCLUSION

6.1 General

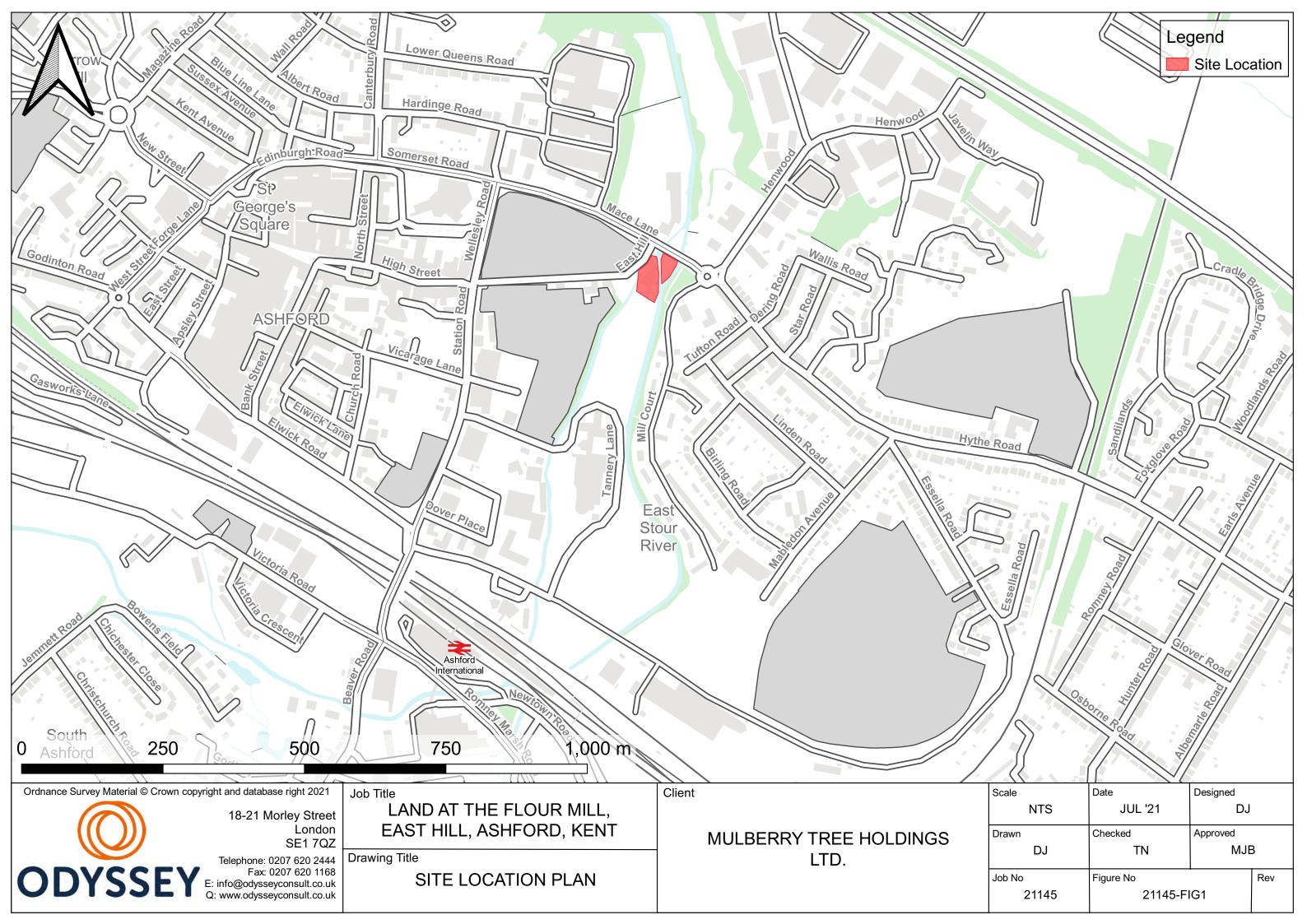
- 6.1.1 This Transport Statement (TS) has been prepared on behalf of Mulberry Tree Holdings Ltd to accompany an application for the development of 53 residential units at The Flour Mill, East Hill, Ashford, Kent, TN24 8PA. The site has had several different uses over the years and was most recently used as a nightclub until 2013.
- 6.1.2 The site is located within the administrative boundary of Ashford Borough Council who act as the Local Planning Authority, and Kent County Council who act as the Local Highway Authority. The TS has been produced following pre-application advice received from ABC, which is included within **Appendix B**.
- 6.1.3 From a study of the existing transport conditions, it is considered that the site benefits from convenient access to regular bus and rail services, which provide access to local employment centres, as well as sustainable commuting trips into other locations in Kent, in addition to central London via Ashford International Railway Station.
- 6.1.4 Local bus stops and Ashford International Railway Station are accessible by walking and cycling modes, thus providing potential future users of the proposed residential units with sustainable alternatives to private car use. The development is also situated close to Ashford town centre and a range of everyday facilities within walking and cycling distance.
- 6.1.5 The proposed development would make appropriate provision for a total of 90 cycle parking spaces, which would be in excess of ABC's adopted parking standards, with residential cycle parking located in a secure store within the development. Cycle parking for the office use would be located adjacent to the office frontage. In addition, the development proposals would provide a total of 54 car parking spaces, of which seven would be allocated to members of staff of Ashford School, and four allocated to the office use. 45 car parking spaces would be available for the proposed residential use.
- 6.1.6 Vehicular access into the Flour Mill site is currently taken from East Hill via an access road, which is located at approximately 68m to the south of East Hill's priority junction with A292 Mace Lane. Vehicular access would continue to take place from East Hill.
- 6.1.7 Following Pre-application Advice from ABC, a traffic calming measure has been proposed adjacent to the site to slow down oncoming vehicles approaching the site from East Hill.

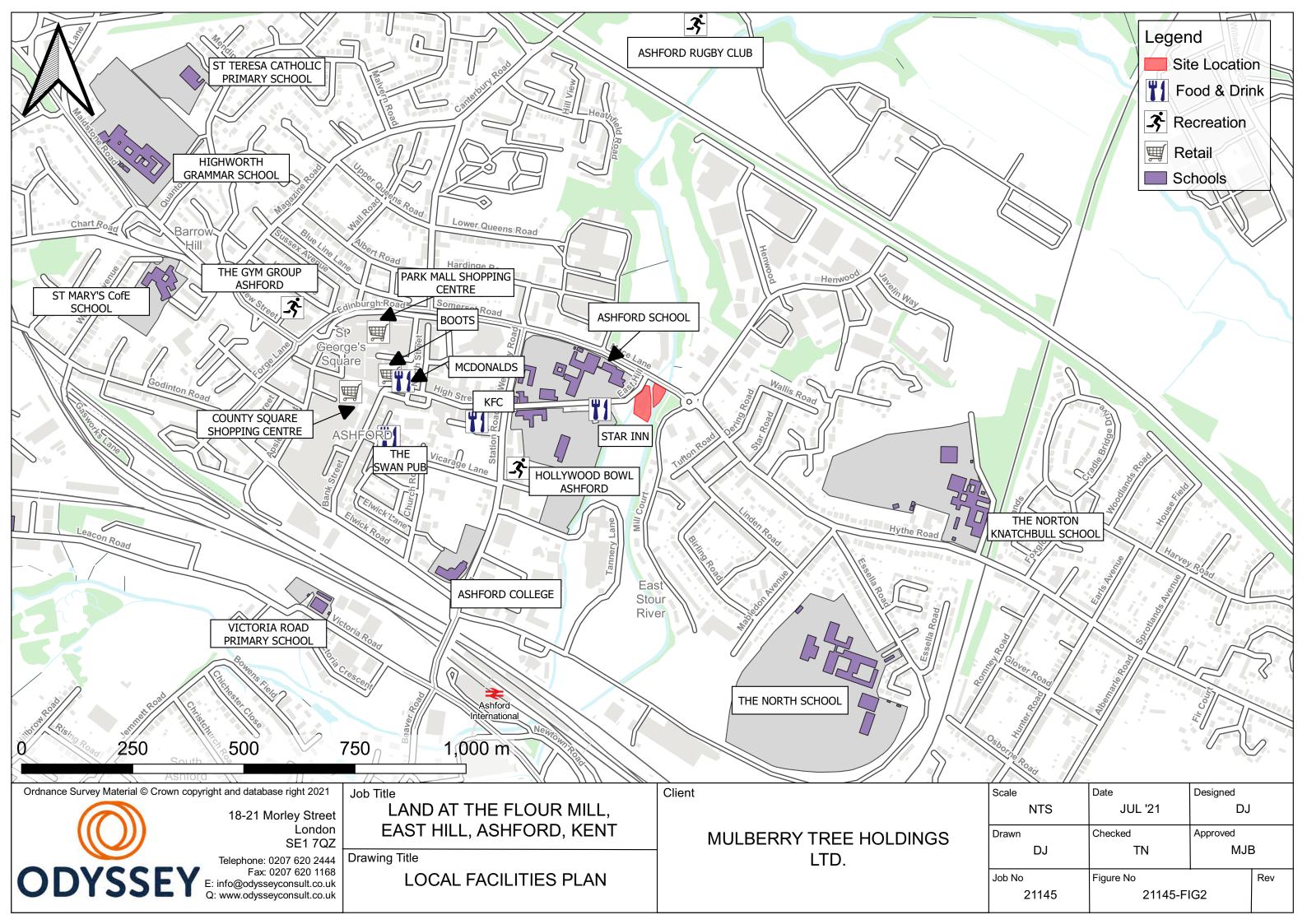


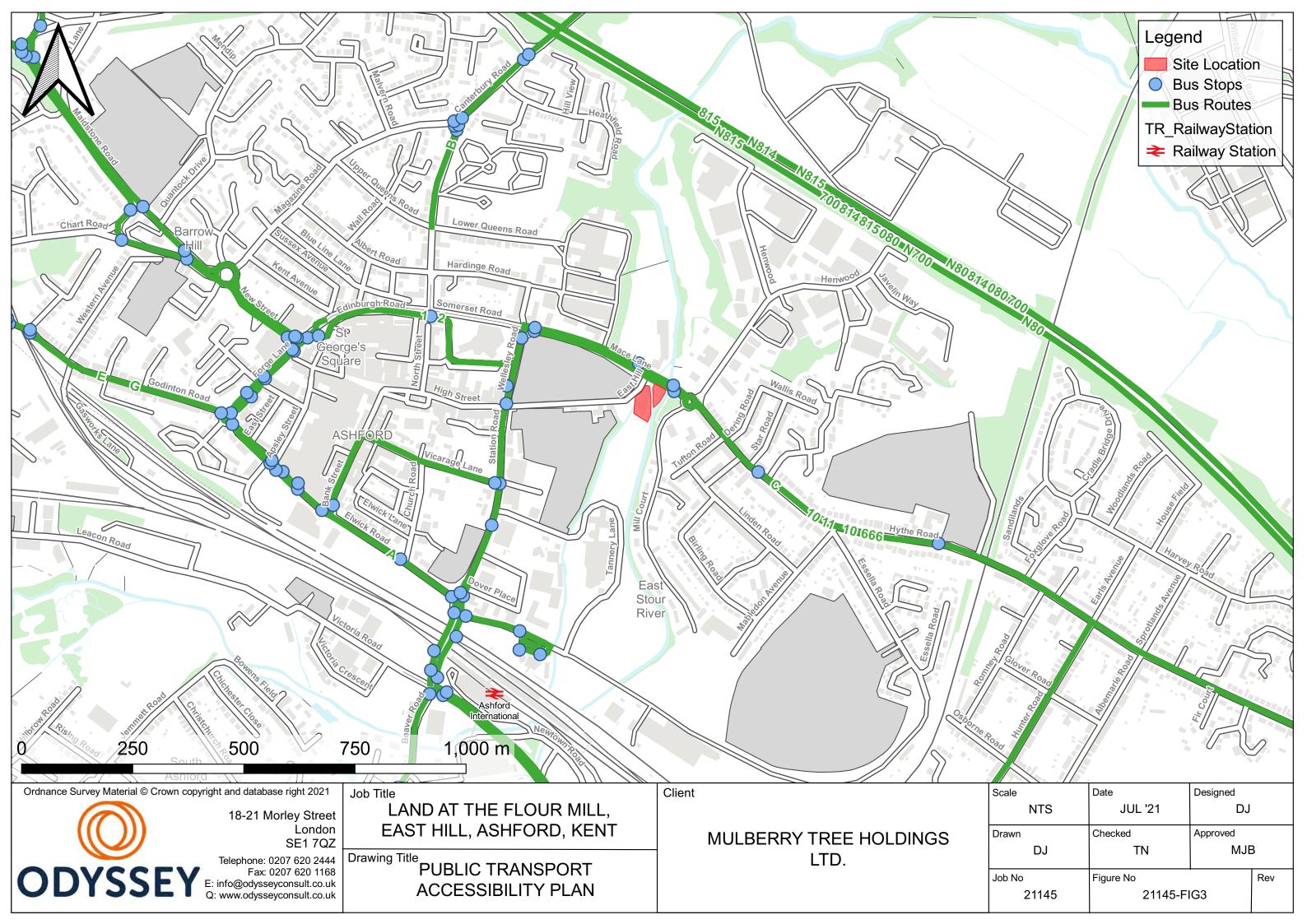
TRANSPORT STATEMENT

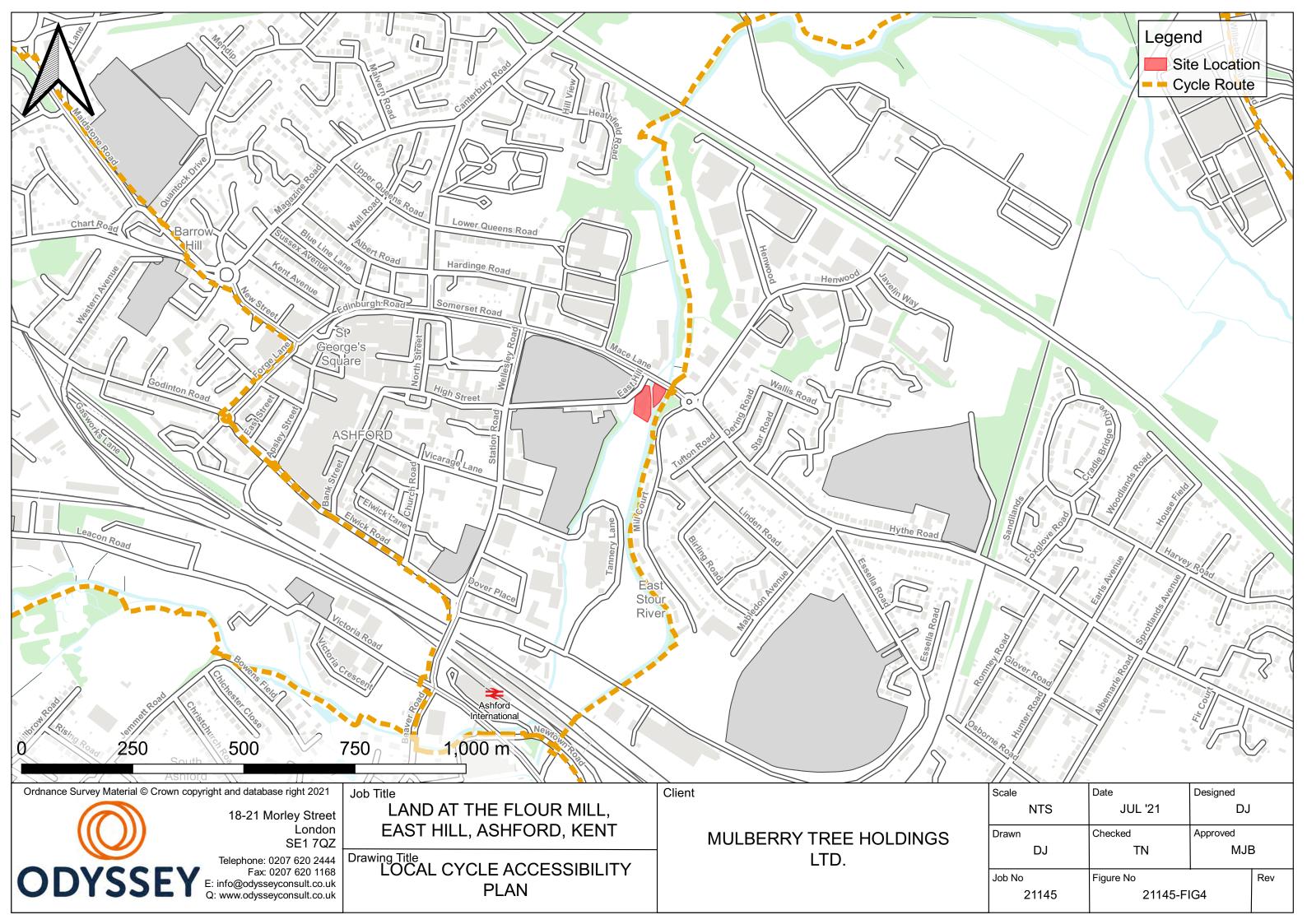
- 6.1.8 The TS has provided an analysis of multi-modal trips expected to be generated by the proposed development. It has been estimated that the development would result in an increase in daily multi-modal trips, however, a significant proportion of trips would be made by sustainable modes including walking, cycling and public transport.
- 6.1.9 It is considered that the proposals would result in a minimal impact on the local highway network. Any additional trips from the proposed development would not be anticipated to result in a detrimental transport impact and would be suitably accommodated within the existing highway and transport networks.
- 6.1.10 Based on the above, it is considered that the proposals could be accommodated without detriment to the operation of the local highway and transport infrastructure networks. As such, the development proposal would not result in a 'severe' impact and is considered acceptable in accordance with national and local policy.

FIGURES

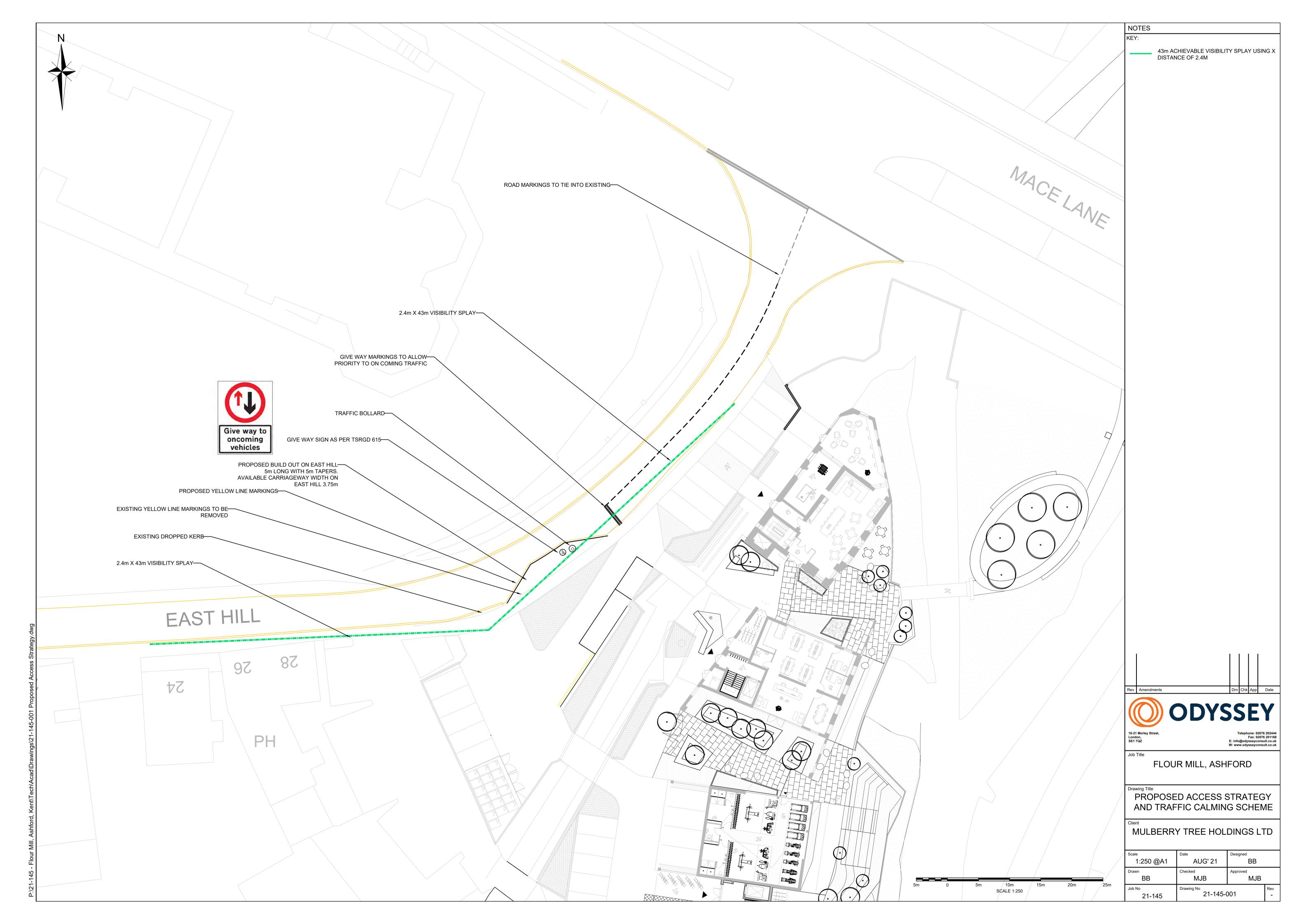


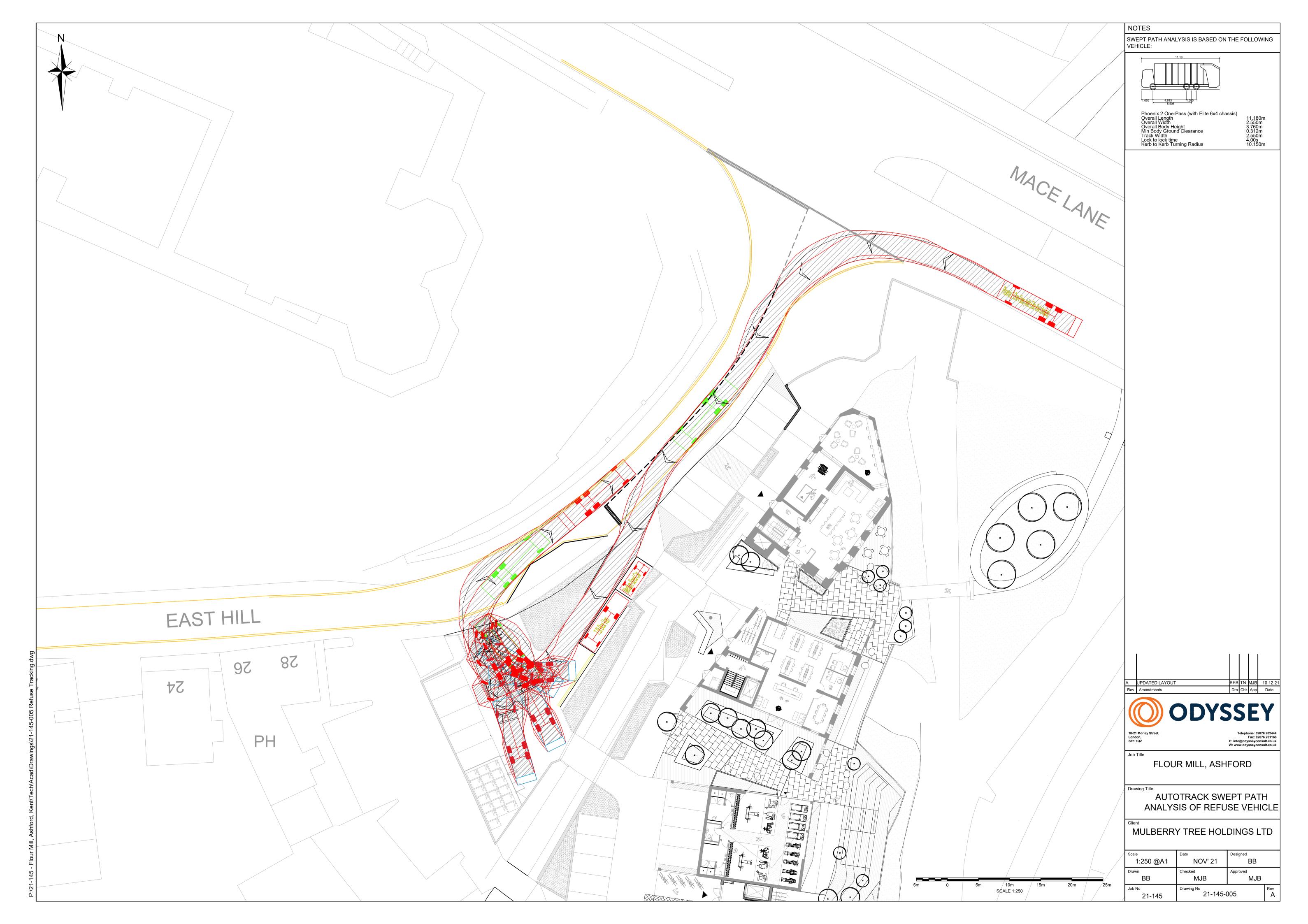


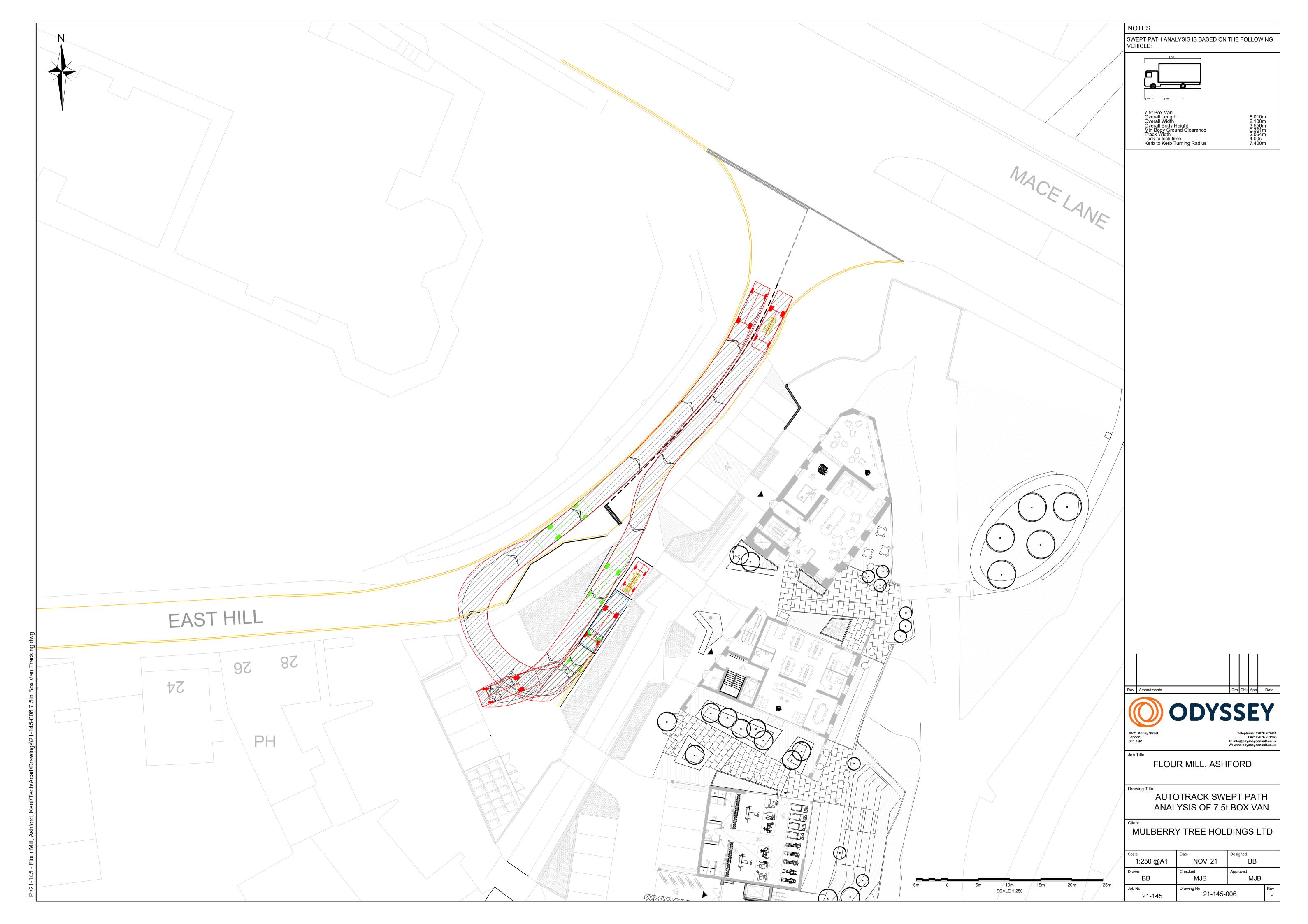


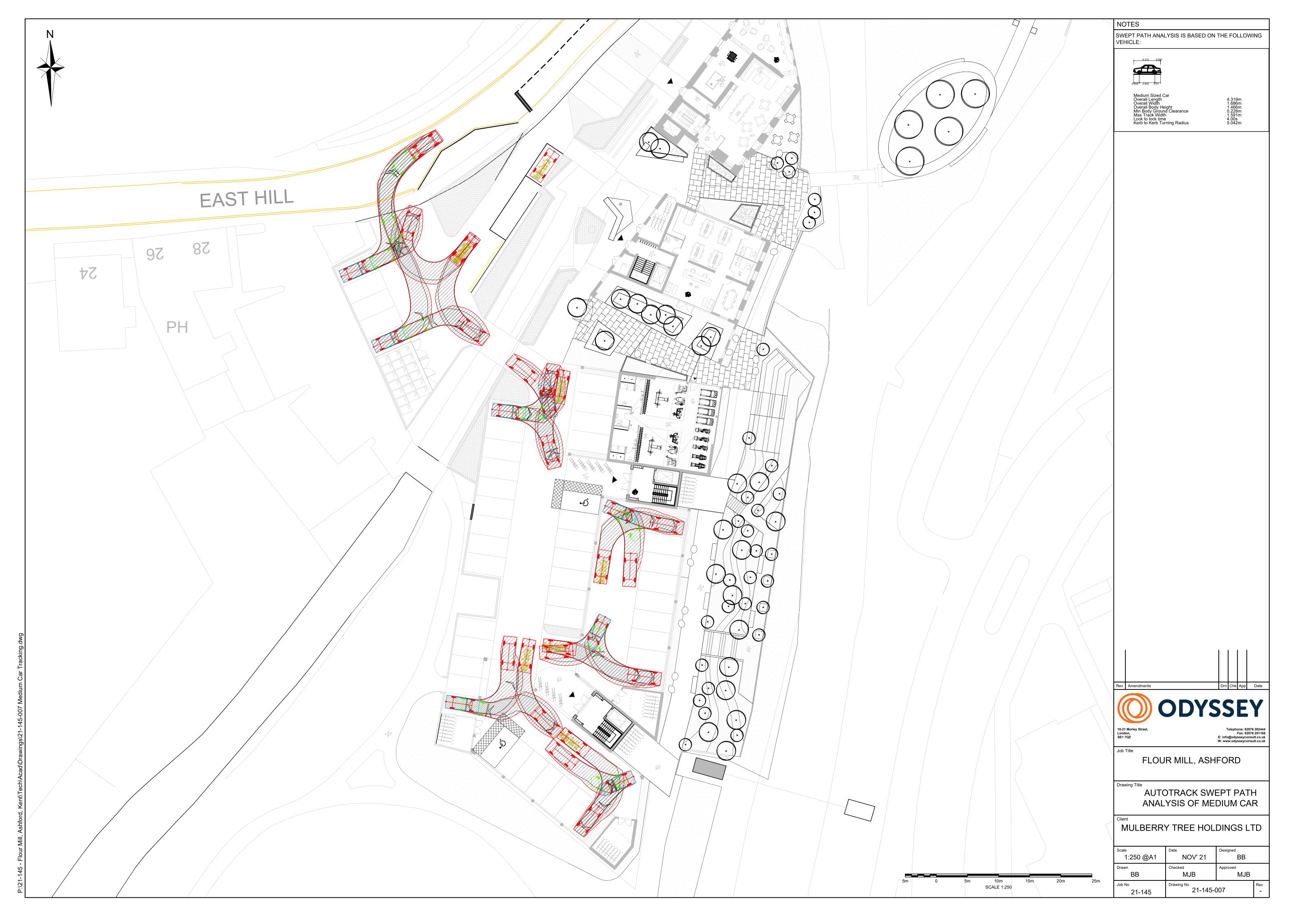


DRAWINGS



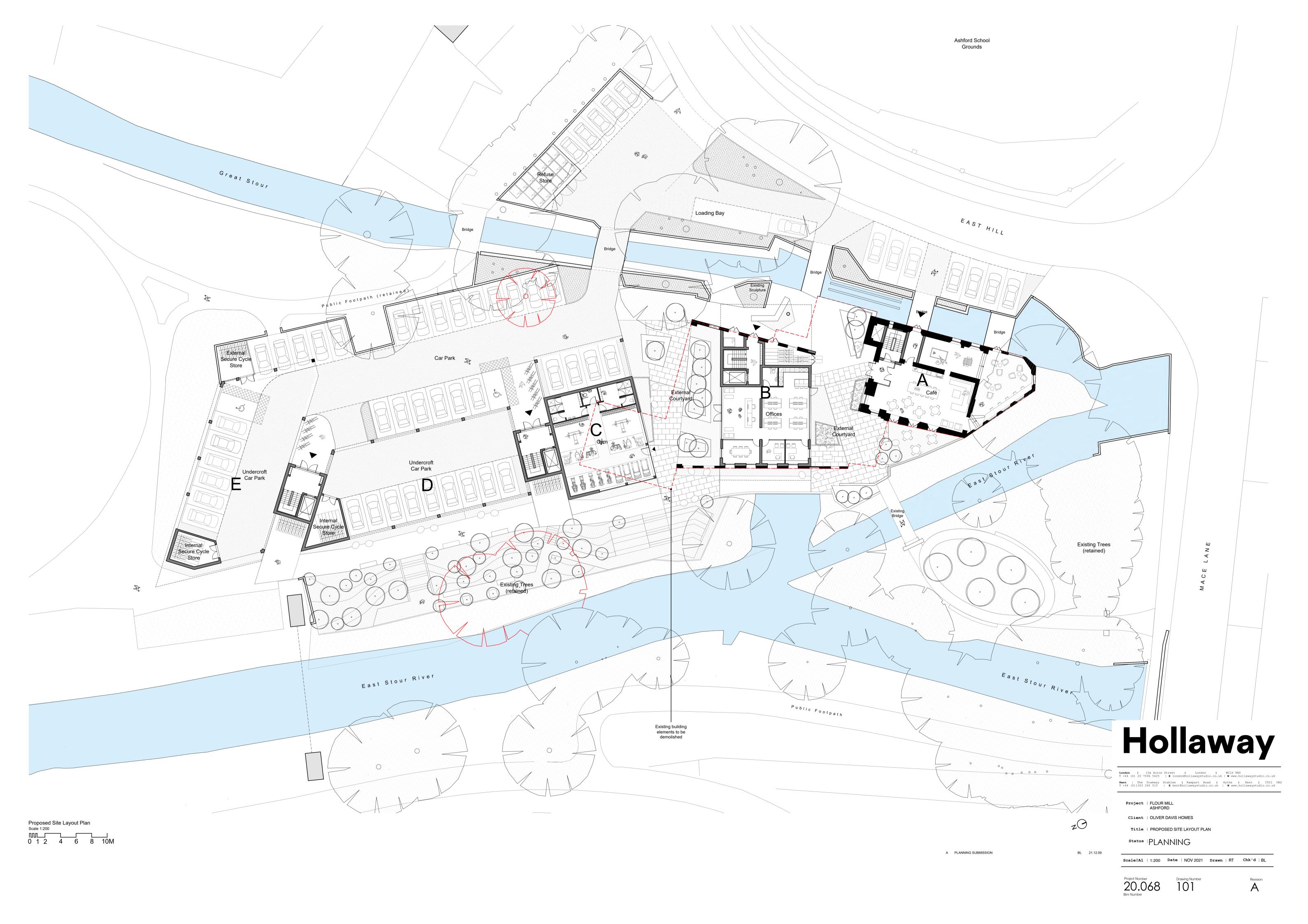






APPENDIX A

Site Layout Plan



APPENDIX B

Pre-application Advice

Planning and Development

Ask for: Lesley Westphal

Email: lesley.westphal@ashford.gov.uk

Direct Line: (01233) 330386

Mr B Ludlow
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Kent
CT21 5BG

Civic Centre Tannery Lane Ashford Kent TN23 1PL 01233 331111

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AshfordBoroughCouncil

Our Ref: 20/00263/PRE Date: 11 March 2021

Dear Mr B Ludlow

Location The Old Flour Mills, East Hill, Ashford, Kent

Proposal Residential development comprising the conversion of the existing

'Pledges' Flour Mill and the erection of two additional blocks (A and B) to provide a total of no. 72 apartments (Use Class C3), access, parking, and

associated infrastructure

I refer to your request for pre application advice that was received on 05 October 2020.

These comments are made in respect of the revised submission made in January following officers response to the initial scheme. Please accept my apologies for the delay in this formal response.

Identified Constraints:

Within Ashford Town Centre

Nearest Listed Buildings are in East Hill to the West

Within Ashford Town Centre Conservation Area

Nature Reserve identified as/filled ground in the top left corner of the site

Public Open Space- island and around the main part of the site

Ashford Green corridor

Flood Zones 2 and 3

Ground Water Vulnerability

Stour Catchment: Upper Great Stour

The Site was most recently in use as a ground floor nightclub with apartments above, whilst the remainder of the site was in use for car parking. I understand the building is now currently vacant and last occupied in 2013.

Relevant Development Plan Policies:

Ashford Local Plan 2030

SP2

SP5

SP6

HOU1

HOU3a

HOU6

HOU12

HOU14

110014

HOU15

HOU18

EMP6

TRA3a

TRA4/5/6/

TRA7

ENV1

ENV2

ENV3a

ENV₆

ENV7

ENV8

ENV9

ENV11

ENV13

ENV14

COM1/2/3/4

IMP1

Relevant SPD's

Affordable Housing Provision

Sustainable Design

Public Green Spaces & Water Environment

Residential Parking

Sustainable Drainage

Fibre to the Premises

Residential Space and Layouts

Principle of Development

The site lies within the urban confines and the identified town centre of Ashford, and any new residential development would be subject to consideration under a number of policies, but Policy HOU3a summarises the most relevant matters and specifies the general issues that would need to be addressed and resolved in order that permission could be considered acceptable. I wont rehearse the terms of this policy here but needless to say compliance with this policy and the respective policies to which it leads would need to be resolved in order for the principle to be established and considered acceptable.

The primary issues I consider to be:

- the impact upon the flood plain,
- impact upon the European Designated Site at Stodmarsh lakes,
- impacts upon the Green corridor,
- the loss of open space,
- impact upon the Conservation Area and
- Design

- parking/the loss of the public car park.
- Trees
- Ecology/Biodiversity

Flooding:

The majority of the Flour Mill site is located within flood zones 2 & 3 and is at risk of flooding from the Great and East Stour. A small area around the substation is the only part of the site not located within Flood Zone 2. I have not been able to consult with the Environment Agency but I see that previously we have advised that they have indicated that part of the site is also located within the functional flood plain (flood zone 3b) and this I would suggest is checked. You are aware of the risks in respect of the use of the site for residential use and advise that discussions with the EA are ongoing so I wont rehearse the potential difficulties associated with the placement of residential development in a flood zone can cause. Any application would need to address this issue and a Flood risk Assessment would need to be submitted demonstrating how it would meet the requirements of the Ashford Local Plan (ALP) Policy ENV1, the Ashford Strategic Flood Risk Assessment and the Ashford Stage 1 Surface Water Management Plan prepared by Kent County Council and the NPPF.

I am aware, following discussions with the EA previously, that we have advised that the site would not be suitable for any compensation storage given that it is located within a fluvial floodplain.

Policy ENV6 advises of strict adherence to the sequential and exception tests within the NPPF and clearly this scheme would not be located in the most sequentially appropriate location. However the conversion/future use of the former flour mill at least is bound to this site and It will therefore be a matter for you to demonstrate that the scheme would not put future residents at unacceptable risks as well as demonstrating that the risks elsewhere would not be increased as a result of this scheme. The NPPF at paragraphs 159-160 addresses the exception test and para 160 specifically sets out the matters that need to be addressed successfully should this scheme come forward. This will in my view form part of the planning balance which the Council will need to undertake but which will be informed by the evidence supplied by you within any submission.

Based upon a discussion with Mr Davies I understand the EA have suggestions that would necessitate the movement of the propose residential blocks back from the river edge some 3m's and you are currently working on how that will affect the scheme we discussed earlier this year. This may affect the riverside path during flood events and will require some lowering of land levels but I am told would not be harmful to any riverside trees: being a concern previously expressed. This remains with you to resolve.

I note that we have also previously advised that as a result of the presence of an electricity sub station on the site that historically this may have resulted in the storage of fuel at the site and it is likely that we would require a PRA for the site detailing any potential risk to receptors such as controlled waters. The Local Authority should be contacted in relation to contamination risks to human health.

The Council would of course seek advice from the Environment Agency as part of any application submission but from our discussions thus far it appears that this would be resolved prior to any application submission.

SUDS /Drainage

The scheme should be designed in accordance with the Ashford Sustainable Drainage

(SuDS) SPD. This matter would be subject to consultation with the County Council at application stage and if you require details of contacts at KCC for discussion of this matter please let me know.

Please find below a developers' checklist from KCC to assist developers as to the level of information that is required when submitting an application to assist in ensuring that all information required by KCC is received. Early dialogue with the applicant's design consultants is advisable.

	For detailed planning application, those listed for an outline planning application as well as details of:					
 Impermeable area Discharge location Infiltration capacity Design calculations for peak flow, volume control and greenfield runoff, and/or brownfield runoff where appropriate Inclusion of climate change & future development allowances Topographical survey of the site Details of any adjacent water course Areas of flood risk Quantification of any surface water flows on-site from off-site locations Exceedance routes Offsite works Consents Any constraints which affect the development Locations of sensitive receptors, including groundwater protection zones, habitat designations or archaeological features Temporary drainage during construction Proposed extent of adoption Phasing Correspondence from any receiving authority or permitting authority. 	 Final design calculations Plan of proposed SuDS with sub-catchment areas including impermeable areas and phasing Existing and proposed site sections and site levels Long sections and cross sections for the proposed drainage system Details of connections to watercourses and sewers Soil and groundwater conditions if discharging to ground Operational characteristics of any mechanical features Access arrangements for all proposed drainage measures Management plan for all non-adopted drainage Landscape planting scheme if proposing vegetated sustainable drainage measures Plan for management of construction impacts including any diversions, erosion control, phasing and maintenance period (pre-adoption) Correspondence from any receiving authority or permitting authority 					

Stodmarsh European Designated Site:

The scheme also needs to take into account the impacts of the new development upon the European Designated Site of Stodmarsh Lakes.

From our meeting this is an issue with which you are familiar so there is probably little I can say that you do not already know from other sites with which you are dealing around the District. In summary the Council are, along with other affected authorities working on a mitigation strategy but that is not in place yet and at present we are not able to approve permission for any new residential scheme within the Stour Catchment area unless it can be demonstrated that it would not have any likely significant effects upon the designated sites. Our working practice is such that we will work on submitted schemes to the point of determination and if the only outstanding matter is the impact upon Stodmarsh, will seek an extension of time to allow time to devise a mitigation strategy or until such time as an approach becomes apparent that would not result in adverse impacts upon the designated sites. The Council does now have access to a consultant who can advise us on any nutrient neutrality submissions when they are submitted.

Green Corridor:

The site lies in the identified Ashford Green Corridor and ALP Policy ENV2 advises that the protection and enhancement of this corridor is a key objective. Development proposal

will be permitted providing that it is "compatible with or ancillary to their principal open space use or other existing uses and can be demonstrated that It would not cause significant harm to the overall environment, bio diversity, visual amenity, movement networks or functioning of the Green corridor."

This policy also refers to other forms of development not being permitted unless it relates to the redevelopment of a suitable brownfield site or delivers overriding benefits and can be demonstrated to cause "no significant harm to the overall environment, bio diversity, visual amenity, movement networks or functioning of the corridor." The site is previously developed and most of it is not an undeveloped natural green open space. However some of it is a greenfield, undeveloped space and even that part forming the car park in fact is largely open with views through the site.

Having discussed the revised submission with our policy team, officers view is that the scheme could meet the requirements of Policy ENV2, subject to final design considerations and the full policy 'balance' assessment to be undertaken when the full scheme comes in for consideration.

In particular, as a brownfield site, as set out in Policy ENV2, the proposals may be acceptable even though residential use is not considered 'ancillary' to the function of the green corridor. In addition, it appears the scheme could include some elements which could be considered 'ancillary', such as a café. The clear improvement from my perspective is that the island would cease to be inaccessible and could form a very attractive and accessible open space, particularly bearing in mind its proximity to the flats, office and café as well as the creation of a riverside walk at this point where currently there is none.

Additionally the draft proposals appear to be making a positive contribution to the green corridor by taking into consideration the requirements of the policy to provide improvements to the Green Corridor functions, in that biodiversity improvements would be made, as well as improvements to the movement network and open space and this would allow connection with both North Park and Queen Mothers Park.

A final scheme would need to meet the requirements set out above and in ENV2, and the requirements for improvements set out in the Action Plan. You will need to provide evidence that there is no significant harm to the overall environment, biodiversity, visual amenity, movement networks and setting of the Green Corridor. The proposal to address these issues at Design Review Panel are supported.

Consultation with EA and KSCP, who manage much of the Green Corridor in this location, is also recommended.

Open Space:

Policy COM2 advises that the provision of public open space, natural greenspace, informal greenspace and other forms of open space shall be consistent with the standards established in the Public Open Space, Green Spaces and Water Environment SPD. That part of the site lying between both river channels and currently fenced off from the adjacent footpath was, in your most recent submission, shown to be remain undeveloped and to be made available to the public – a development which the council would wholeheartedly support and which in association with the benefits of the new riverside walk and proximity to the proposed development including a café, provide benefits to the Ashford Green corridor as addressed above.

It is likely that the Council would require the following different types of green open public

space for the residents of any approved scheme, based upon the Councils Public green Spaces and Water Environment SPD:

Outdoor sports pitches
Informal/Natural Green Space
Childrens and Young Peoples play Space
Allotments
Strategic Parks
Cemeteries

Apart from the use of the island the site would not appear capable of providing these on site and it would therefore be usual to secure financial contributions for these infrastructure improvements to the standards set out in the relevant SPD.

Heritage and Conservation Area Issues:

The site itself is partly occupied by the Flour Mill; a late 19th and early 20th century industrial mill building. The site lies in the Conservation but the Mill is not listed. The CA is a designated Heritage Asset whilst the Flour Mill is considered to be a non designated heritage asset and to be of local heritage interest. There are map indications of earlier mill buildings being on this site and remains of these may survive on site. The flour mill itself is of local heritage interest in that it was a key local industry and there is potentially some local heritage literature.

Redevelopment would need to take into account the archaeological importance of the mill as well as its value as a local heritage asset. You provided evidence regarding the previous levels of development on the site, albeit those have since been reduced to the levels now seen.

The site is close enough to the Town Centre Conservation Area to have an impact upon the setting of that CA and therefore ABC Local Plan Policy ENV13 would be relevant in respect of the potential impacts of the development of this scheme and its impacts upon the setting of the CA and the former mill building. Both being subject to the requirement of preservation and enhancement. It may be that a conservation area character appraisal would assist in identifying how the redevelopment of this site could contribute to the setting of the adjacent CA and therefore the form of that development, rather than being prepared afterwards to support an already identified form of development.

Redevelopment of this site would need to take into account the local heritage interest and archaeological industrial interest in the current building; the archaeological interest of the early mill buildings and landscaping works; and the palaeo-environmental interest of the Alluvium. Redevelopment of the site could mean the loss of an important local historic industrial site but it could present an opportunity to explore heritage interpretation of the site and ensure that the flour mill and its heritage are still accessible to the local community and visitors. The fact that the site will provide for some community accessible areas would suggest that to a greater or lesser degree this would be possible. The key historic character of this site is its industrial character. This should not be lost as part of development and should preferably be enhanced within the development scheme.

The application needs to carry out some work to discover the industrial importance of this site. I would suggest that you appoint an industrial archaeologist at an early part of the project, rather than think of it as a supporting document to a formal application, as it may uncover important remnants, which may curtail the development later. The site does not appear to lie within an area of archaeological interest however.

The benefit of carrying out repairs to renovate and convert the Flour Mill, as a non-designated heritage asset, will be an important material consideration in the application. The benefit of restoring the Flour Mill and any contributions that could be made by making the mill accessible to the public, in whatever form, would be a contributing factor in the overall planning balance for the submitted scheme.

In our discussions about the various options advanced, comments had been made by our CO regarding the potential adverse impacts of terraces on the elevations facing onto the CA. Likewise he referenced the importance upon both the setting of the CA and the impact upon the mill of the bulk, form and mass of new build around the site. It was considered important that any new build should be set back from the front of the mill so that the mill remains visible from the adjacent park as a focus on the site rather than being subsumed by proposed new buildings. In the second submission your preferred option (and ours) took advantage of that approach and set the proposed new 'wing' back from the main mill frontage. It allowed the tower to remain as the most prominent feature of the site acting as a lynchpin to the mill and the new 'wing' proposed . A number of other issues have been raised and are set out below:

- It still needs to be established what historic fabric would need to be altered to facilitate the conversion into residential.
- This as an opportunity to seek heritage gains by improving the interpretation of the site. As part of any application, it is requested you provide a heritage strategy. Can display boards be installed showing the history of the site?
- Will the words 'Flour Mills 1901' on the tower be retained?
- What improvements to the public realm are proposed in front of the mill?
- What about bin storage? It will be important these are stored in a discreet location to avoid harming the character of the conservation area.

Design:

I understand that you are happy to take the scheme through the design panel process but would prefer to do that before the design becomes too finalised – the concern being that a lot of time would have been expended which potentially may then need to be 'undone'. That approach is understood and agreed. The comments below therefore relate to the higher order design issues of layout and scale / massing rather than specific detail. Further information is needed before more detailed comments can be offered on architectural design. In terms of the submission to the review panel a scheme will be needed of course that provides enough detail regarding the layout, bulk and mass of the scheme with some indication of the design approach to be taken such that the panel have sufficient detail upon which they can base their assessment, comments and recommendations, but which avoids the detail necessary for a completed submission to planning. You advise that a member of your team is a member of the panel, so I think we should be able to rely upon the fact that you have enough experience of this process to ensure that sufficient detail is provided to ensure a worthwhile response from the panel to guide the next steps of this process. If you can let me know when you anticipate having plans ready for this process I would be grateful so that I can ensure that this scheme is 'on the list' for the next available meeting.

Option 1 was identified at our discussion as your preferred option: an approach supported by the Council based upon the fairly limited information available at our meeting, but being the approach which, at this stage, seems to offer the greatest opportunity to develop into a successful scheme. We discussed a number of issues and these are set out below:

• In terms of siting, Block B is an improvement on the previous scheme and is likely

to preserve important views of the mill. We support the setting back of all of the blocks which will now be subservient to the mill.

- The CO has commented that the angled form of the blocks does not reflect the mill in his view and the design of the blocks would appear slightly contrived. On the other hand, if executed well these bespoke building types could introduce a contemporary edginess to this part of the development and create a more responsive enclosure to the river corridor. Perhaps this is something that could be considered further through design review and supported with further information.
- The scheme would enhance the green corridor, improve access and utilise the island as a new public space. It would retain the green infrastructure on Mace Lane. A key element of the conservation area is the green open spaces. Historic photographs show the area surrounding the mill was open land, by returning the island to a green open space there is an opportunity to enhance the character of the conservation area. I understand that the block proposed would need to be set back further from the river which would encourage greater open space around the river and an enhancement of the green corridor at this point, as well as providing potential for greater bio diversity enhancements.
- Is the pedestrian access into the space between Blocks B and C sufficiently legible?
 The four parking spaces adjacent to the west elevation of Block B seem to block its route.
- The success of the space between Blocks B and C relies on the success of the two new café/commercial units that are proposed on the ground floor of Block C. Whilst this is a bit of a chicken and egg argument, is there sufficient footfall to support these uses? What might go there if they prove commercially unviable?
- Lighting of footpath? Security issues?
- Waste storage and collection. It is not clear where bins will be stored or how refuse will be collected.
- The breaking up of the new build elements into smaller blocks is supported.
- Compared to the previous scheme it would seem that there are a lot less single aspect flats which is supported.
- All new build flats will need balconies. We have previously raised concerns about balconies on the west face of the development with views from East Hill. In this new arrangement with the new build elements set back the most 'sensitive' part of the development in this respect is the west face of Block B. Can balconies be integrated into the building form on this face of Block B?
- The treatment of the public realm around all edges of building will be important. Too
 much tarmac exists already so a better planting, materials and quality porous
 surface should be looked at. The landscaping, water and history of the building
 means a very integrated, creative and attractive setting to all edges of the building
 should be explored.

Parking:

Please refer to the Councils Local Plan policy TRA3a which specifies the anticipated parking standard which references 1 space per unit in town centre sites. I understand you will provide parking at the rate of 1/unit with 20% for visitor parking resulting in a total of 86 spaces.

The scheme would be built on land under the Councils control and partly owned by the Council and which is used for a car park. The Council would not object to the development on the basis of the loss of parking at Flour Mills car park and I understand anyway that you have the ability to terminate the Councils access to the majority of the car park with only a few months notice.

This car park is hardly used at all by fee-paying customers but is used by ABC staff, which kept spaces free in the main Civic Centre car park which could then be used by fee-paying customers. The number of occasions (pre-Covid) when the car park was full to the brim would indicate that having some staff parking elsewhere is a benefit. Reduced office working practices post-Covid might make the sort of additional capacity we have in Flour Mills unnecessary, as there could be expected to be fewer people coming onto the site than was the case previously.

ABC market traders (roughly between 3-7 vans on market days) park in Flour Mills. If we lose the Flour Mills parking we will need a place with space for them in the meantime. As these are large vans, we need to be aware that in other car park they could overhang into more than one bay, making the overall impact of their presence in a busier car park more than a simple head-count of vans. These vans currently park in the rear set of bays in Flour Mills, so their overhang can hang over the verge by the river. As the traders set up early, they can be pretty much assured of these spaces on market days as virtually no other users have arrived by that time- we have never, to my knowledge, had a problem for traders finding a space here, even if no bays are specifically set aside for 'market trader' use. This is a localised arrangement with no legal footing but we would work with the traders to find alternative parking for their vehicles.

Ashford School staff are heavy users of this car park too. The submitted plan indicates that Ashford School are going to retain some spaces, but these are outside the current car park boundary, so we do not enforce these at the moment anyway. We have provided a number of free parking permits to the staff at Ashford school and are currently trying to clarify if there are any legal agreements in place relating to this or if it is a localised arrangement.

The ABC sections are shown as remaining as parking spaces on the drawings, but there would be only about 20 spaces left and it is possible that the Council would not consider retaining these as parking bays due to vehicular access matters ,but seek an alternative use for that area. However whilst these do remain in use for parking ,access to them should be retained and I am advised that the Council has rights of access across 2 x 4 m wide strips of land to these spaces.

Trees:

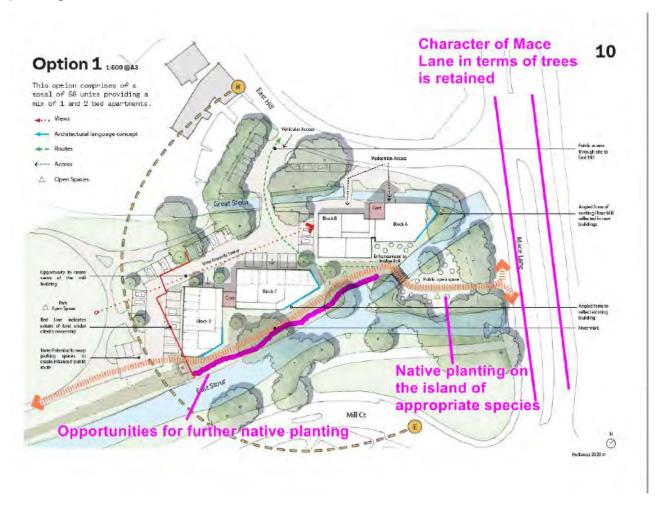
The trees and associated riverside vegetation are an integral feature of the green corridor. They are visible in views north and south along Mace lane and east and west along the green corridor and are an important visual feature within the Conservation Area. The site makes an interesting approach to town centre providing a dense cluster of trees to contrast with the built form of the town centre.

The trees along Mace Lane and on the island appear to have been left unmanaged for many years, and as a result, they have grown to a size where future management to give clearance along the river and over the highway may need to be considered. This can be done sensitively and should not necessitate their removal.

The original scheme has been amended such that the proximity of trees to proposed buildings has changed overcoming some original concerns. We would obviously need details of the quality and grade of the trees on and around the site that could be affected by the scheme – the aim being to avoid the loss of any good quality trees. Rather we

should be looking to add to the trees along this green corridor.

The plan below offers an indication of those areas considered to offer potential for new planting and tree retention.



Ecology/Biodiversity:

Land to the south east and south west of the existing car park is identified as being a Nature Reserve which runs around the nearby leisure centre whilst the Great Stour running to the west of the site is identified as the Great Stour, Ashford to Fordwich Wildlife site. Policy ENV1 of the ABC Local Plan 2030 specifies the Councils approach for such matters and it would be expected that the nature of the scheme on this previously developed site should be able to make material improvements to the standards of bio diversity on and around the site.

This site makes an important contribution to linking larger areas of green space to the north and south of the site and indeed the nature reserve which stretches north and south either side of the Mace Lane and an appropriate scheme should take the opportunity to strengthen this corridor. It would appear from the Option 1 submissions that this would be the case and I understand that potentially a wider corridor may be needed between the proposed development and the river which should enable greater enhancement than had been apparent when we last discussed Option 1. This could involve appropriate waterside planting to strengthen this corridor and encourage movement between the wildlife habitats to the north and south of the Mill. Since the Great Stour corridor is designated a Local Wildlife site (AS27) I would suggest that prior to any strategy being considered that an ecological scoping assessment including walk over survey be carried to inform the need for any further surveys and the design of the finished scheme.

Obviously the issue of Stodmarsh is also covered by this policy but this in my view could be dealt with really as a separate issue to be resolved independently of any bio diversity improvements on and around the site, albeit of course both issues need to be resolved

before any permission could be issued.

Other matters that would also need to be addressed as part of the consideration of a scheme on this site would include the following:

Affordable Housing:

Ashford Local Plan HOU1 identifies that an affordable housing contribution would be required other than in the Ashford Town Area within which this site lies, unless the scheme is proposed as a Build to Rent scheme, in which case by case consideration would be given to its ability to deliver affordable rented housing, upto a maximum of 20% of total dwellings. This would be resolved by means of the submission of verifiable viability evidence and it is usual for the Council to submit such evidence to its own viability consultants for assessment and for the applicant to pay for this assessment. Such evidence should be submitted with the application. Section 2 of this policy references how this matter is addressed should independently verified viability evidence establish that it is not possible to deliver the required affordable housing allowing a case by case assessment of how affordable accommodation may still be provided.

Space Standards & Lifetime homes:

The 'essential' standards to be operated by Ashford Borough Council, in the Residential Space and Layout SPD ,are therefore the minimum standards which need to be met in order for a scheme to be regarded as acceptable against the criteria of policies HOU12 and HOU15 of the ALP.

Whilst I imagine that the conversion of the original part of the Mill may be difficult to achieve lifetime homes standards it is assume that the relevant provision would be made within the new parts of the scheme.

Housing Mix:

ALP Policy HOU18 requires a scheme of this size to provide a range and mix of dwelling type and sizes to meet local needs. The borough wide SHMA document that supports the local plan identifies 2-3 bed houses as those most needed – Chapter 8). For most major sites and in the absence of a local evidence pointing to a specific need) as long as we see a mix of unit sizes and types on the site and it includes 2 and 3 beds, then we usually say that HOU18 has been met. In this case we are considering a flatted scheme and would still expect to see a range of unit sizes to be provided.

Highways:

KC carry out their own pre-application enquiry system so I cannot offer much comment here other than the comments below:

- A simple well designed traffic calming feature on the corner outside the main building building should be looked at to slow down vehicles leading into East Hill. This could help improve the impressions and setting of the frontage of the building if done sensitively.
- We would be supportive of a route through the site from Mace Lane although it is anticipated that this will need to be controlled/gated at times, but restricted to residents only when café is shut. The route through the car park to North Park needs to be defined, clear and obvious and not restricted by any barrier!

Refuse:

Tracking diagrams need to be provided to demonstrate layouts and evidence that the current bridge structure is sufficiently strong to accommodate these vehicles.

The bin store should be large enough and accessible to crews.

S106 contributions:

Contributions to the following could be expected as part of any scheme: the precise figures to be clarified at the time of submission:

Outdoor sports pitches
Informal/natural green space
Children and young Peoples play space
Allotments
Cemeteries
Strategic Parks
Monitoring Fee
Voluntary Sector
Public Art

Additionally the following contributions regarding County Council expectations would be expected:

Secondary Education Primary Education Libraries

Conclusion:

The site clearly has a number of constraints and issues that need to be resolved before it will become clear if an acceptable and policy compliant scheme can be developed and issues such as flooding remain outside the Councils scope of influence. Certainly the conversion of the Mill is supported in principle although work is obviously required to progress the design. On the basis of information submitted which does lie within the Councils remit (excluding comments on the loss of parking) it is considered that the scheme does warrant further exploration.

It is too early to identify what the planning balance may be given that so many issues remain unclear at present, but it is clear that there are benefits to the scheme that could form a part of such a balancing exercise, including for instance bringing a listed building back into use, and providing housing within a sustainable location of the Town Centre.

If you determine to pursue this scheme please let me know about the proposed date for the review panel so that we can progress matters from this end.

Given the nature of the proposal and the issues arising you may consider it worth carrying out some local consultation with the Ward Member(s), Town Council and local residents prior to any formal submission.

I hope this is of assistance but please let me know if any comments are unclear.

Yours sincerely

Holloway

Development Management Manager

Notes for your information:

1. When you make an application please ensure that it meets the requirements of the council's validation advice note and that a validation checklist appropriate for the type of application is completed and submitted with it.

- 2. The advice note and relevant checklist can be accessed via the "Applying for planning permission" pages of the council's website (www.ashford.gov.uk) on the "Is in my application valid" page.
- 3. The advice given by Council Officers for pre-application enquiries does not constitute a formal response or decision of the Council with regards to any future planning application. Any views or opinions are given in good faith, and to the best of ability, without prejudice to the formal consideration of any planning application.
- 4. The final decision on any application can only be taken after the Council has consulted local people, statutory consultees and any other interested parties.
- 5. A final decision on an application will be made by senior officers or by the council's Planning Committee and will be based on all the information available at that time.
- 6. This advice will be carefully considered in reaching a decision or recommendation on any resulting applications; subject to the proviso that the circumstances and information may change or come to light that could alter the position. It should be noted that the weight given to pre-application advice will decline over time.
- 7. It should be noted that if the planning application is delayed for a significant period then any pre-application advice may be overtaken by changes in national, regional or local policy and guidance.

APPENDIX C

TRICS Outputs

Thursday 22/07/21 Page 1 Licence No: 138301

Calculation Reference: AUDIT-138301-210722-0728

TRIP RATE CALCULATION SELECTION PARAMETERS:

White Hart Lane

: 03 - RESIDENTIAL Land Use

: C - FLATS PRIVATELY OWNED MULTI-MODAL TOTAL VEHICLES

Selected regions and areas:

SOUTH EAST

BEDFORDSHIRE BD 1 days

04 EAST ANGLIA

> NORFOLK NF 1 days

05 **EAST MIDLANDS**

NT NOTTINGHAMSHIRE 1 days

09 NORTH

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CUMBRIA CB 2 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings Actual Range: 35 to 62 (units:) Range Selected by User: 35 to 75 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

01/01/13 to 15/05/18 Date Range:

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Tuesday 2 days 1 days Wednesday Thursday 2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count 5 days Directional ATC Count 0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines.

Selected Locations:

1 Town Centre Edge of Town Centre 2 Suburban Area (PPS6 Out of Centre) 1 Edge of Town

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known

Selected Location Sub Categories:

Residential Zone 1 Built-Up Zone 2 No Sub Category

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village,

Thursday 22/07/21 Page 2

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Secondary Filtering selection:

Use Class: C3

C3 5 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

All Surveys Included

Population within 1 mile:

 1,001 to 5,000
 1 days

 10,001 to 15,000
 2 days

 25,001 to 50,000
 2 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

 5,001
 to 25,000
 1 days

 50,001
 to 75,000
 2 days

 75,001
 to 100,000
 1 days

 250,001
 to 500,000
 1 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

1.1 to 1.5 5 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

lo 5 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present 5 days

This data displays the number of selected surveys with PTAL Ratings.

Thursday 22/07/21 Page 3

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LIST OF SITES relevant to selection parameters

1 BD-03-C-02 BLOCKS OF FLATS BEDFORDSHIRE

STANBRIDGE ROAD LEIGHTON BUZZARD

Edge of Town Centre Residential Zone

Total No of Dwellings: 62

Survey date: TUESDAY 15/05/18 Survey Type: MANUAL

2 CB-03-C-01 BLOCK OF FLATS CUMBRIA

KING STREET CARLISLE

Town Centre Built-Up Zone

Total No of Dwellings: 40

Survey date: THURSDAY 12/06/14 Survey Type: MANUAL

3 CB-03-C-02 BLOCK OF FLATS CUMBRIA

BRIDGE LANE PENRITH

Edge of Town No Sub Category

Total No of Dwellings: 35

Survey date: WEDNESDAY 11/06/14 Survey Type: MANUAL

NF-03-C-01 BLOCKS OF FLATS NORFOLK

PAGE STAIR LANE KING'S LYNN

Edge of Town Centre Built-Up Zone

Total No of Dwellings: 51

Survey date: THURSDAY 11/12/14 Survey Type: MANUAL 5 NT-03-C-01 HOUSES (SPLIT INTO FLATS) NOTTINGHAMSHIRE

LAWRENCE WAY

Suburban Area (PPS6 Out of Centre)

No Sub Category

Total No of Dwellings: 56

Survey date: TUESDAY 08/11/16 Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

Page 4 Licence No: 138301

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TRIP RATE for Land Use 03 - RESIDENTIAL/C - FLATS PRIVATELY OWNED

MULTI-MODAL TOTAL VEHICLES Calculation factor: 1 DWELLS

Estimated TRIP rate value per 55 DWELLS shown in shaded columns

BOLD print indicates peak (busiest) period

	ARRIVALS			DEPARTURES				TOTALS				
	No.	Ave.	Trip	Estimated	No.	Ave.	Trip	Estimated	No.	Ave.	Trip	Estimated
Time Range	Days	DWELLS	Rate	Trip Rate	Days	DWELLS	Rate	Trip Rate	Days	DWELLS	Rate	Trip Rate
00:00 - 01:00	_											
01:00 - 02:00												
02:00 - 03:00												
03:00 - 04:00												
04:00 - 05:00												
05:00 - 06:00												
06:00 - 07:00												
07:00 - 08:00	5	49	0.127	6.988	5	49	0.234	12.848	5	49	0.361	19.836
08:00 - 09:00	5	49	0.057	3.156	5	49	0.234	12.848	5	49	0.291	16.004
09:00 - 10:00	5	49	0.111	6.086	5	49	0.156	8.566	5	49	0.267	14.652
10:00 - 11:00	5	49	0.111	6.086	5	49	0.127	6.988	5	49	0.238	13.074
11:00 - 12:00	5	49	0.115	6.311	5	49	0.090	4.959	5	49	0.205	11.270
12:00 - 13:00	5	49	0.139	7.664	5	49	0.119	6.537	5	49	0.258	14.201
13:00 - 14:00	5	49	0.123	6.762	5	49	0.139	7.664	5	49	0.262	14.426
14:00 - 15:00	5	49	0.082	4.508	5	49	0.078	4.283	5	49	0.160	8.791
15:00 - 16:00	5	49	0.111	6.086	5	49	0.090	4.959	5	49	0.201	11.045
16:00 - 17:00	5	49	0.180	9.918	5	49	0.094	5.184	5	49	0.274	15.102
17:00 - 18:00	5	49	0.197	10.820	5	49	0.119	6.537	5	49	0.316	17.357
18:00 - 19:00	5	49	0.254	13.975	5	49	0.172	9.467	5	49	0.426	23.442
19:00 - 20:00												
20:00 - 21:00												
21:00 - 22:00												
22:00 - 23:00												
23:00 - 24:00												
Total Rates:			1.607	88.360			1.652	90.840			3.259	179.200

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

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Parameter summary

Trip rate parameter range selected: 35 - 62 (units:)
Survey date date range: 01/01/13 - 15/05/18

Number of weekdays (Monday-Friday): 5
Number of Saturdays: 0
Number of Sundays: 0
Surveys automatically removed from selection: 0
Surveys manually removed from selection: 0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Page 5 Licence No: 138301

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TRIP RATE for Land Use 03 - RESIDENTIAL/C - FLATS PRIVATELY OWNED

MULTI-MODAL OGVS

Calculation factor: 1 DWELLS

Estimated TRIP rate value per 55 DWELLS shown in shaded columns

BOLD print indicates peak (busiest) period

	ARRIVALS			DEPARTURES				TOTALS				
	No.	Ave.	Trip	Estimated	No.	Ave.	Trip	Estimated	No.	Ave.	Trip	Estimated
Time Range	Days	DWELLS	Rate	Trip Rate	Days	DWELLS	Rate	Trip Rate	Days	DWELLS	Rate	Trip Rate
00:00 - 01:00												
01:00 - 02:00												
02:00 - 03:00												
03:00 - 04:00												
04:00 - 05:00												
05:00 - 06:00												
06:00 - 07:00												
07:00 - 08:00	5	49	0.004	0.225	5	49	0.004	0.225	5	49	0.008	0.450
08:00 - 09:00	5	49	0.000	0.000	5	49	0.000	0.000	5	49	0.000	0.000
09:00 - 10:00	5	49	0.000	0.000	5	49	0.000	0.000	5	49	0.000	0.000
10:00 - 11:00	5	49	0.000	0.000	5	49	0.000	0.000	5	49	0.000	0.000
11:00 - 12:00	5	49	0.000	0.000	5	49	0.000	0.000	5	49	0.000	0.000
12:00 - 13:00	5	49	0.004	0.225	5	49	0.004	0.225	5	49	0.008	0.450
13:00 - 14:00	5	49	0.004	0.225	5	49	0.004	0.225	5	49	0.008	0.450
14:00 - 15:00	5	49	0.000	0.000	5	49	0.000	0.000	5	49	0.000	0.000
15:00 - 16:00	5	49	0.000	0.000	5	49	0.000	0.000	5	49	0.000	0.000
16:00 - 17:00	5	49	0.000	0.000	5	49	0.000	0.000	5	49	0.000	0.000
17:00 - 18:00	5	49	0.000	0.000	5	49	0.000	0.000	5	49	0.000	0.000
18:00 - 19:00	5	49	0.000	0.000	5	49	0.000	0.000	5	49	0.000	0.000
19:00 - 20:00												
20:00 - 21:00												
21:00 - 22:00												
22:00 - 23:00												
23:00 - 24:00												
Total Rates:			0.012	0.675			0.012	0.675			0.024	1.350

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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