

CLLR RORY LOVE OBE

Kent County Councillor for Cheriton, Sandgate, & Hythe East
Vice Chairman, Environment & Transport Cabinet Committee



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By email

5th October 2021

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NATTRAN/SE/S247/3254 or DPI L2250 21 22 SUOH - Princes Parade Objection to the Stopping-up and Diversion of Princes Parade, Hythe - Statement of Case by Councillor Rory Love

I write as the Kent County Councillor for Cheriton, Sandgate, and Hythe East; the County Council Division which includes the development site and the surrounding area.

I have confined my case for objecting to the Stopping Up Order solely to the matter of the road closure and its impact. My objection to the road closure, on behalf of the fifteen thousand residents I represent, is not based on any wider objection to the development of the site adjacent to Princes Parade. Indeed, I have previously been on record as supporting the proposal to build a new swimming pool on this site.

My starting point is that the onus is on Folkestone & Hythe District Council to demonstrate that the closure of the road is necessary to allow for the planning consent to be implemented, and that the merits in closing the road outweigh the demerits that arise from its closure. The onus is not on the objectors to demonstrate that it is not necessary to close and divert the road. The default position, unless the Council succeeds in proving that the closure is necessary and that the supposed merits of closure are not outweighed by the demerits, must be that the Order is not confirmed and the road is not closed.

Necessity Test for diverting the road adjacent to the 'Detailed Consent' part of the site

The case for closing the road around the part of the site that has the benefit of detailed planning consent (the swimming pool/leisure centre site) should be taken separately from the case for closing and diverting the road around the part of the site that has the benefit only of outline planning consent (the housing site).

At its easternmost point, the leisure centre building encroaches onto the



position of the current road by approximately 1.5m. This is the maximum encroachment onto the position of the current road. At a point approximately half way along the leisure centre building, the encroachment onto the current road is just 0.5m. Given that the new road at the rear of the leisure centre is likely to be around 7.3m wide (to match the width of the current road), there appears to be adequate room to move the leisure centre by 1.5m in a northerly direction, thereby eliminating the need to close the existing road. Indeed, there would be sufficient room to move the building by 3.25m, thereby enabling the current 1.75m width of pavement on the north side of Princes Parade to be retained. This would also allow an additional 4m undeveloped buffer strip between the leisure centre and the Royal Military Canal.

I therefore question whether the necessity of moving the road adjacent to the leisure centre is proven. My view is that this is such a minor relocation of the leisure centre that the case cannot be made for the necessity of the road diversion even around this section of the development.

Necessity Test for diverting the road adjacent to the 'Outline Consent' part of the site

Irrespective of whether the relocation of the road around the leisure centre is necessary, I believe it is impossible to argue the case for the relocation of the road around an outline planning consent for the development at the western end of the site. There is no detailed planning consent; merely an ambition and acceptance in principle that 150 homes will be built. When the detailed plans are drawn up, the buildings can certainly be positioned in order to avoid the need to close the road. Indeed, the outline plans show the illustrative positions of the building set back from the front building line of the leisure centre, and it appears highly likely that the buildings do not encroach at all onto the road, and barely onto the pavement on the north side of the road. Only a very minor adjustment, if any at all, would be required from the illustrative outline plan. Furthermore, the illustrative position of buildings on an outline plan does not constitute a detailed planning consent.

There is no necessity for the movement of the road around the outline section of the development site.

The Merits Test with respect to Impact on Traffic, including Traffic Displacement

Finally, I wish to turn to the impact of the diversion of the road, and in particular, the impact it will have on the behaviour of the drivers of the vehicles that undertake, on average, 4,500 vehicle movements per day on Princes Parade.

I understand from Kent County Council Highways Team that vehicle displacement is not an exact science. However, the impact of introducing into the road two 'Priority Give-way' features, up to four raised pedestrian crossing platforms, and six new bends is that a proportion of motorists will be dissuaded from using the road.

I have illustrated in part of my attached letter (Headed "Appendix" and dated 16th August 2018) the impact of such traffic displacement based upon assumptions clearly set out in the

letter. The impact of additional traffic on the remaining three junctions by which motorists can access or exit the residential area of Hythe to the south of the Royal Military Canal will be felt not only by those motorists, but other road users as well. This is especially the case at the Twiss Road/East Street roundabout and at the Portland Road/Scanlons Bridge Road junctions. At both of these junctions, vehicles exiting south Hythe to travel eastwards towards Folkestone have first to travel westwards before completing a U-turn either at a roundabout (East Street) or at a complex junction arrangement at Scanlons Bridge Road. In both cases, these vehicles will impact upon traffic travelling eastwards from the Dymchurch direction. At the East Street roundabout, a likely consequence will be for traffic from the west to use the bus lane to take a short-cut into Station Road and Mill Road before rejoining Seabrook Road, with a knock-on impact for the safety of residents in the narrow Mill Road.

In the light of the merits case concerning the traffic impact, I urge the Inquiry:

1. To consider carefully the necessity case for stopping up and diverting the road around the leisure centre, as compared with a minor relocation of the leisure centre by 3.25m in a northerly direction, and
2. To reject the case to stop up and divert the road around the section of the site which benefits only from outline planning consent.

If, and only if, the Inquiry is satisfied that there is a proven necessity case for diverting the road around the leisure centre, then I would urge it to consider recommending to the Secretary of State that the Order is modified to stop up and divert only that part of the road in front of the leisure centre.

This reduced diversion would remove some of the physical intervention measures which would cause significant traffic displacement from a road described by Folkestone & Hythe District Council themselves as a “Strategic Road Link.” This would minimise the impact on motorists using Princes Parade, but also using the A259 (Dymchurch Road, Scanlons Bridge Road, Military Road, Prospect Road, East Street and Seabrook Road), as well as the minor residential roads that will carry increased traffic displaced from Princes Parade (St Leonards Road, Portland Road, Stade Street, and Twiss Road.) to

Yours faithfully,

Rory Love

Attached: Letter confirming that I do not withdraw my objection to the Order (dated 7th June 2021) with my traffic analysis appended (letter dated 16th August 2018, and headed “Appendix”). I may refer to information from these letters at the Public Inquiry.

CLLR RORY LOVE OBE

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7th June 2021

Reference: NATTRAN/SE/S247/3254
Princes Parade Stopping Up Order

Dear Mr Madden,

I write in response to your email of 10th May 2021 in which you invite me to consider Folkestone & Hythe District Council's (FHDC's) responses to my objection to the Stopping-up Order for Princes Parade, which I lodged on 7th June 2018, and further to consider whether I wish to withdraw my objection.

Having now studied in detail the report by Buckles Solicitors, which considers the various objections made to the Order, I write to inform you that my objections have not been addressed. I am therefore **not** withdrawing my objections to the Order.

As there are two email addresses quoted for any response to your email, I have sent a copy of this letter to both addresses, as well as to the case officer at the Department for Transport.

So serious are the omissions and failures by the Buckles report to address the concerns that I raised in my original letter of objection, that I believe the only way for a full analysis of all objectors' concerns, many of which I highlighted or referenced in my own objection letter, is for the Secretary of State for Transport to hold a full local public inquiry. Given that many of the concerns on the impact of the stopping up of the Princes Parade road were not examined as part of the planning application, a public inquiry is essential to give the public the confidence that due process has been undertaken.

I made six specific objections to the proposed Stopping-up Order. I shall address the inadequacy of the Buckles responses to all of them.



Objection 1 - The stopping up and diversion of such a large section of Princes Parade is unnecessary for the proposed leisure centre development and the associated housing.

Buckles have argued that the closure of the road is necessary for two reasons: to avoid physical obstacles and to avoid legal obstacles.

However, there appears to be no physical obstacle to the development of either the leisure centre or the housing. The only part of the development proposals which would be curtailed by the presence of the road is the doubling in width of the promenade to 11m. This can hardly be considered a necessary part of the development.

The Buckles report also argues that there are legal obstacles to the development caused by the presence of the road in its current location. At paragraphs 6.7 and 6.8, they cite a number of planning conditions which they claim present such legal obstacles.

However, the conditions to which they refer in their Report are not the conditions agreed by the Council (under delegated authority in accordance with the decisions made at the planning committee meeting). Buckles have quoted a draft list of conditions which was superseded when the final planning decision notice was issued on 18th July 2019. The conditions they have cited, where they differ from the final agreed conditions, therefore have no basis in law. This is a surprisingly careless and potentially negligent error for a firm of solicitors. Even if the planning conditions which most closely match those cited are applied, the argument that they present a legal obstacle fails at any reasonable analysis.

They say at para 6.7:

In particular, planning condition 44 imposes a strict and absolute legal obstacle to the carrying out of the development without such an order [an order made by the SoS for transport in accordance with S247]. It provides:

“44. The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans”.

However, agreed Condition 4, which is the closest match to draft condition 44, is quite clearly concerned only with details relating to the leisure centre. It refers to drawings showing the floor plans and the car and coach parking arrangements for the leisure centre. While the drawings show the re-aligned road, this is incidental to the purpose of the drawing. There would need to be access from the road to the car parks wherever the road was situated, and there is sufficient room on site to accommodate any alternative access.

In para 6.8.1, reference is made to draft Condition 65. This carries little weight as the draft condition is significantly different from the final planning Condition 13, which is the closest match. Buckles’s interpretation of draft Condition 65 is:

Condition 65 - both the promenade and the road re-alignment are works to be included within the phasing plan to be agreed prior to commencement of the development and implemented in accordance with it. As matter of construction programming such works will need to be completed earlier in the phase plan;

The clear implication is that once agreed, there is a legal impediment to starting the development unless the road is re-aligned. However, Buckles’s highly selective choice of words to summarise the draft Condition omits a key phrase that appears in both the draft

and final Conditions, namely: “unless otherwise agreed in writing by the local planning authority”. It can hardly be argued that a planning condition necessitates the closure of the road if that very same planning condition specifies the alternative of seeking agreement with the planning authority for a variation to the plan.

In para 6.8.2, draft Condition 51 is cited as evidence that there is a legal obstacle to the leisure centre being occupied until the re-aligned road is opened. The Buckles report says:

Condition 51 - prevents first occupation of the leisure centre until the realigned road, and thus the parking facilities accessed off it, are open;

In truth, neither the draft Condition 51 nor the agreed Condition 33 (which is the closest match) even refer to the road alignment. They are both entirely concerned with ensuring adequate parking facilities, and that such facilities are open before occupation of the leisure centre. The Buckles summary of this Condition turns the Condition on its head, suggesting the road is the primary point and the parking facilities are a consequence. In truth, the Conditions do not require the road to be re-aligned, but do require parking facilities to be in place. Draft Condition 51, and the reason for it, are as follows:

51. Prior to construction above foundation level, details of vehicular and cycle parking facilities for the leisure centre and the eastern public car park shall be submitted to the local planning authority for approval in writing, with such details as approved made available prior to the first use of the leisure centre and kept available for parking purposes at all times thereafter.

Reason:

It is necessary to make provision for adequate off street car and cycle parking to prevent obstruction of the highway and to safeguard the amenities of occupants and visitors to the development.

Agreed Condition 33, which has the narrower scope of the Leisure Centre, and not of any building on the site above foundation level, says:

33. Prior to construction of the leisure centre building hereby permitted above foundation level, details of vehicular and cycle parking facilities for the leisure centre and the eastern public car park shall be submitted to and approved in writing by the local Planning Authority. The approved facilities shall be made available prior to the leisure centre being first opened to the public and thereafter shall be kept available for use for parking in connection with the leisure centre and public car park at all times.

Reason:

It is necessary to make provision for adequate off street car and cycle parking to prevent obstruction of the highway and to safeguard the amenities of occupants and visitors to the development.

It seems to me that the imaginative interpretation and augmentation of a draft Condition is designed to intimidate those who argue against the re-alignment of the road by presenting a fabricated argument for the necessity of the road re-alignment.

Finally, Buckles report cites draft Condition 38 as evidence of the necessity of the road closure in order for the development to proceed. However, both this draft Condition and agreed Condition 30, which is the closest match, are entirely concerned with the phasing arrangements for any works, as the Reason states:

In order to minimise the extent and duration of parking displacement and ensure the roadworks follow highway authority procedures...

The Condition itself refers to the need to submit a phasing strategy and have it approved by the local planning authority prior to commencement of the development. Such a phasing strategy would be required whatever alignment the road took. Condition 30 is not evidence of the necessity of the road re-alignment.

I believe that Buckles Solicitors have failed to supply any sound evidence for the necessity of the stopping up and re-alignment of the road.

Objection 2 - The proposed diversion will have a detrimental impact on the road users.

Objection 3 - The inconvenience will cause many Motorists to switch to Seabrook Road

Objection 4 - The unnecessary road diversion and its consequences are a greater concern to many residents than the development itself.

The focus of all of these Objections is that the proposed diversion will make the Princes Parade route less attractive for drivers as they negotiate four new bends and encounter restrictions giving priority to pedestrians and to motorists travelling in the opposite direction. The speed limit will also be reduced from 40mph to 30mph, although the Council has also set out its intention to “change [Princes Parade’s] character by designing for vehicle speeds of 20mph.” (From an FHDC Exhibition Panel outlining the “Key project objectives.”) I do not seek to judge the merits of these key objectives. They may be considered entirely appropriate for the road. But it is likely that they will have an impact on the use of the road. It is a plausible scenario that they will make the road less attractive to motorists using it as a ‘strategic road link’ (FHDC’s own description of Princes Parade) between Hythe and Folkestone, and are likely to dissuade many motorists from using it. For every motorist dissuaded from Princes Parade, there will be an additional motorist on one of the alternative access points to Seabrook Road, which will then carry all such displaced vehicles.

In my objection to the stopping up order, and in more detailed analysis as part of my objection to the planning application (which I have attached as an appendix to this letter), I outlined my concerns about the impact this displaced traffic could have on the existing road network. In the open letter to the Members of the Planning Committee, I said:

“I ask that committee members satisfy themselves that traffic arrangements are adequately covered before approving the plans.”

It later transpired that Members of the Committee were not shown my submission, despite my receiving an acknowledgement of its receipt at the Council, and were not therefore able to consider my analysis. This analysis, which explores scenarios using FHDC’s own consultants’ highway usage figures, shows circumstances leading to a 24% increase in traffic making a left turn out of Twiss Road between 7am and 10am. It also illustrates a 20% increase in the traffic on the East Street roundabout which takes priority over (and therefore delays) traffic proceeding from Prospect Road to East Street.

The only traffic issues that have had an opportunity to be aired and debated are those relating to (1) predicted general traffic growth to 2023, and (2) the additional traffic

generated by the development. The Officers' Committee Report DCL/18/10 refers to the objection I raised in my earlier letter (dated 25th October 2017) as follows:

6.5 Representation from Cllr Rory Love;

Object to the proposal in relation to the relocation of the road, displacing traffic onto Seabrook Road to the detriment of the amenity of local residents;

However, the issue of displacing traffic onto Seabrook Road is neither considered nor answered in any report that went before the Planning Committee, and remains unanswered in the Buckles Report. The Buckles Report does, however, explain that the Secretary of State for Transport:

...must determine whether the disadvantages and losses, if any, flowing directly from a closure or diversion order are of such significance that he/she ought to refuse to make the closure or diversion order.

My question is how can the Secretary of State determine those disadvantages unless they are fully and publicly explored? It is not sufficient that a senior Officer of FHDC states in private correspondence that:

"The analysis carried out suggests that any displacement ... will not be significant."

If such analysis has been carried out, then it should be made public and subjected to scrutiny. If for no other reason, this should be done to confirm the effectiveness of the Council's declared strategy to "discourage 'rat-running'" along Princes Parade. In the absence of publication of the analysis, many people will find it a little curious that the inclusion of three raised traffic platforms, two priority working constrictions, four new bends, and a reduced speed limit is predicted to result in no significant reduction in the volume of traffic using Princes Parade and being displaced onto other roads. They will also find it curious that if such an analysis exists, it has not already been published both in the interests of transparency and to inform decision-making.

Objection 5 - Impact upon the tranquility of the historic setting of the Royal Military Canal

This objection has been correctly summarised by Buckles as:

"...the contention of several objectors that the closure and diversion of the road will directly cause adverse noise and air pollution to walkers of the RMC due to its closer proximity."

However, in their response, they have said:

"...the Council's Environmental Health Officer in response to the planning application did not advise of any adverse air pollution levels arising from the development nor required a noise acoustic report. (8 See paragraph 5.16 of the Officer's Committee Report.)"

This is a blatant misrepresentation of the text of the Officer's Committee Report (DCL/18/10), which actually said:

Noise - After reviewing further road plans and taking consideration to the proposed speed restrictions, the amount of traffic using this road is unlikely to cause a significant noise issue to the future residents. Therefore a noise acoustic report is not required.

The air pollution and noise levels referred to in the Officer's report were not those "arising from the development", and nor were they those that would "cause adverse noise and air pollution to walkers of the RMC"; the concern of the objections. Rather, the Officer's Report was describing the pollution and noise likely to arise from the relocated road in a way that would impact on the residents of the proposed housing. This assessment was carried out as part of a planning application before granting consent to build new housing. It is a standard assessment for any planning application in the vicinity of a source of pollution or noise. It does not make any comment on the impact on walkers of building a new road adjacent to the canal bank's footpaths.

Interestingly, this noise assessment had been revised on 21st November 2017, as was stated in the report. The Environmental Health officer's position prior to that date had been:

Noise - The main source of noise will be traffic on the Princes Parade and the A259. A noise impact assessment is therefore required to highlight any potential noise problems and propose suitable mitigation. [DCL/18/10 Section 5.16, opening paragraph]

This change is significant because the reason for the change is given as the "road plans" and "speed restrictions" and their impact on "the amount of traffic using this road". The clear implication is that less traffic will be using the road as a result of the restrictions, which again conflicts with the Council's contention that "any displacement will not be significant", and with the MLM Consulting Technical Annex 8, which includes traffic projections on the basis of no displacement of traffic.

Objection 6 - Urging that due attention is paid to important issues raised by residents of my County Council Division

I have been unimpressed by the level of attention that has been paid by Buckles Solicitors, working on behalf of FHDC, to the objections I have raised to the stopping up and relocation of the Princes Parade highway. I know that some of these issues, and more besides, have been raised by residents I represent at Kent County Council. These residents deserve answers to the questions and concerns that they have raised.

My Response to the Buckles Report and my Call for a Local Public Inquiry

The issues raised by the public and by me about the proposed stopping up, relocation, and traffic calming of Princes Parade and their impact on the wider local road network were neither answered nor even addressed at the stage of the planning application.

Furthermore, such are the errors, misrepresentation, and avoidance of the issues by Buckles Solicitors in their response to the objections to the stopping up Order, that I believe the only way to address the objections, and to be seen to be addressing the objections, is for the Secretary of State for Transport to call a local public inquiry.

I therefore urge the Secretary of State for Transport, in the interests of due process and transparency, to call a local public inquiry to consider the objections thoroughly and transparently before making a decision on whether to make an Order under Section 247 of

the Town and Country Planning Act on the stopping up and diversion of Princes Parade, Hythe.

Yours sincerely,



Attached as Appendix:

For convenience, I have attached my objection letter for the planning application in which I present an analysis of the possible impact of traffic displaced onto Seabrook Road. The traffic analysis is directly relevant to my objections to the Stopping Up Order.

CLLR RORY LOVE

Folkestone & Hythe District Councillor for Sandgate & West Folkestone, and
Cabinet Member for Customers, Communications, and Digital Delivery.
Kent County Councillor for Cheriton, Sandgate, & Hythe East



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16th August 2018

Folkestone & Hythe

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Dear Mr Allan,

Princes Parade Planning Application Y17/1042/SH

I write, further to my objection of 25th October 2017, as the County Divisional Member for Cheriton, Sandgate, and Hythe East, the Division which includes Princes Parade and Seabrook Road. My purpose is to encourage members of the Planning Committee to consider carefully the traffic implications of the current set of plans for the proposed Princes Parade development. I ask that committee members satisfy themselves that traffic arrangements are adequately covered before approving the plans.

I know that committee members will have studied **Technical Annex 8 - Transport** in the planning application. I shall not therefore cover every example of the concerns that I have about the proposal to stop-up and divert the road at Princes Parade. However, I believe it might be helpful if I illustrate my concerns with one or two examples.

For illustrative purposes, I shall confine myself to traffic movements between 7am and 10am, although the principles will apply to all other times as well. All vehicular movement figures I have quoted are from the traffic surveys in Appendix 6 of Annex 8, and all relate to 7am-10am.

As committee members will have seen, the current planning application is for Princes Parade to be diverted. I believe the introduction of four sharp bends, pedestrian priority measures, and a 20mph speed limit will dissuade many of the current users of Princes Parade as a 'strategic road link' from using it in future. This would be in line with the views of the Council's Strategic Development team that motorists should not be using Princes Parade, and should be using Seabrook Road instead. (It would, however, appear to differ from the Council's original position, when it pledged to "Keep Princes Parade as a strategic road link...")

I shall make the assumption that as many as one third of the vehicles currently using Princes Parade to travel from south Hythe (i.e. the significant residential area south of the canal) towards the A259 heading east will continue to do so in future, despite the anti-traffic

measures described above. In reality, of course, more may be dissuaded from using Princes Parade and switch instead to Seabrook Road.

Between 7am and 10am, 366 vehicles travel eastbound on Princes Parade. Assuming that two-thirds are dissuaded from Princes Parade, and that those 244 are split evenly between the three junctions onto the A259 at Portland Road, Stade Street and Twiss Road, each junction will handle approximately 81 additional vehicles between 7am and 10am.

The only A259 junction that is included in the traffic survey tables is the Twiss Road junction. All dissuaded traffic at Twiss Road will need to turn left to make a U-turn at the East Street roundabout. Currently, 339 vehicles turn left out of Twiss Road. An additional 81 vehicles represents nearly a quarter more vehicles making this turn (24%). These vehicles will then make a U-turn at the East Street roundabout, where they will have priority over traffic heading from Prospect Road to East St (and on to Seabrook Rd) in an easterly direction, and over traffic from Prospect Rd seeking to make a U-turn to use Waitrose. All of these vehicles joining the roundabout from Prospect Rd will be held up by the additional traffic now using this roundabout to make a U-turn to head towards Folkestone.

It would appear that the table column headed "A259 Prospect Rd West U turns" on page 81 of Annex 8 (the table with all other columns headed "A259 Seabrook Road East...") is mislabelled. This same column heading appears (seemingly correctly) on page 77 alongside other columns headed "A259 Prospect Rd West..." It is likely that this column on page 81 should read "A259 Seabrook Road East U-turns". This would mean that the additional 81 estimated vehicles making a U-turn at this roundabout would more than treble the number of vehicles making such a U-turn (from 31 to 112). The number of vehicles using the roundabout to take priority over (and therefore hold up) traffic proceeding straight across from Prospect Rd to East St would increase by 20%. (These are the vehicles turning right around the roundabout from East St to enter the High St or Station Rd, or to make a U-turn.)

There is no similar traffic survey data available to committee members for Stade Street and Portland Road. This is, in my view, an unfortunate omission, as committee members do not have access to important information relating to the other junctions which will bear additional strain from traffic which would previously have used Princes Parade. The Stade Street junction is already busy, and the Portland Road junction will result in traffic using the congested Light Railway junctions in order to make a U-turn to travel eastwards.

Seabrook Road, in the vicinity of East Street, will carry approximately 20% more traffic. (244 extra vehicles on top of the existing 1216 vehicles.)

The question for the committee members to consider with regard to traffic arrangements is whether they are satisfied that the current junctions can cope with the additional demand without detriment to the motorists using them or to local residents. My personal view is that the additional traffic would be unnecessarily detrimental to both motorists, and the residents of my Division.

I should stress that no part of my concerns on the traffic issues should be interpreted as opposition to the principle of the sports facility on Princes Parade. Indeed, I have supported

this location as the best out of those that are available. My concern is related solely to the knock-on effects of moving the road.

There are other benefits of not moving the road. The opportunity would be available to increase the amount of parkland created by the sports centre development. Ironically, there could also be further space available to create additional capital gain from sales of the properties necessary to fund the sports centre.

I would ask that committee members ensure that they are fully satisfied with the traffic implications before approving the application, and would ask that consideration is given to revising the scheme to remove the detrimental implications of stopping up and diverting the road.

Yours faithfully,

Cllr Rory Love