

Proposed Station Road West Multi-Storey Car Park

A formal response to public consultation
on behalf of Canterbury Clean Air group

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Introduction

This document outlines some objections to the planned Station Road West Multi-Storey Car Park from the Canterbury Clean Air group. The Canterbury Clean Air group was formed in April 2017 to raise awareness of air pollution in Canterbury and to object to proposals which increase it.

The objections are grouped into sections according to the guidelines which inform them. Each objection is backed by the relevant guideline *in italics* and then is followed in a box by our explanation of why we believe this guideline to be applicable.

Objections with reference to NICE guidelines

The National Institute for Health and Care Excellence (NICE) recently released guidelines for outdoor air quality with respect to health(NG70) [1], the guidance is specifically targeted towards local authorities as the following bullet points, quoted verbatim under the “Who is it for?” section of the document:

- *Local authority staff working in: planning, local air quality management and public health, including environmental health*
- *Staff working in transport and highways authorities*

Broadly the guidelines recommend (Section 1.1.1) to:

“include air pollution in ‘plan making’ by all tiers of local government, in line with the Department for Communities and Local Government’s National Planning Policy Framework”

Development encourages the use of motorised travel

The guidelines explicitly mention that when ‘plan making’, all levels of government should consider (Section 1.1.2):

“siting and designing new buildings, facilities and estates to reduce the need for motorised travel”

Whilst it has been argued that the proposed Station Road West Multi-Storey Car Park is sited to encourage the use of public transport, such encouragement is generally oriented towards high-speed trains toward London which is the main growth driver for the station [2].

The council would be hard pressed to argue that the station reduces the number that would otherwise drive to London.

In anycase, the material affect of increasing car parking at a heavily used commuter station, if successful, will be to encourage AM and PM peak traffic in Canterbury city and further worsen the effects of air pollution whilst encouraging car use to get to the station over other forms of transport.

Development creates a street canyon which traps pollution

Examining specific recommendations, the guidelines explicitly mention that when ‘plan making’, all levels of government should consider (Section 1.1.2):

- *avoiding the creation of street and building configurations (such as deep street canyons) that encourage pollution to build up where people spend time*

It is worth noting that the effect on air quality of street canyons has been known and has been part of modeling software for a long time [3] and thus it is our belief that the plans should not have got this far with such a design problem in place.

At present the existing car park area is very open, which helps disperse air pollution. The proposed Station Road West Multi-Storey Car Park will both remove this openness, and in narrowing the road will create a street canyon. This will encourage pollution build up and further exacerbate health problems in the area.

Development does not commit to any cycling provision

Section 1.2 of the guidance on “Development management” encourages developers to mitigate road-traffic air pollution. Section 1.2.1 offers direct examples, one of which is by:

“supporting active travel”

The proposed Station Road West Multi-Storey Car Park consultation document states “*Cycle racks and seating would also be provided where space is available*”. Ergo, no commitment is provided for any cycle racks as it might transpire that no space is available for them. This is unacceptable and a clear commitment on quality and number of cycle racks should be given.

Development reduces space for cyclists

Section 1.6.3 of the NICE guidance states that:

“where busy roads are used consider:

- *Providing as much space as possible between the cyclist and motorised vehicles.”*

The proposed Station Road West Multi-Storey Car Park consultation document indicates removal of the station road west parking bays, and an effective road narrowing. This will reduce the effective space between cyclist and motorised vehicles.

Furthermore more generally, there is no cycling provision provided on the adjusted road.

Objections with reference to the National Planning Policy Framework (NPPF)

The National Planning Policy Framework [4] is central government's planning policy document from which all local plans must derive. It's purpose is to *“help achieve sustainable development.”* with a community engagement goal oriented around *“allowing people and communities back into planning”*.

Development encourages an increase in greenhouse gas emissions

Requirement 30 in section 4 of the NPPF states:

“Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.”

The proposed Station Road West Multi-Storey Car Park consultation document proposes a car park. As a car park is populated by cars, this will increase emissions and congestion at peak times when the cars arrive at and leave from the station.

The money for the car park would be better spent improving local cycling infrastructure toward the station, and greening walking routes toward the station.

Development gives priority cars rather than pedestrians and cyclists

Requirement 35 in section 4 of the NPPF states that developments should:

- *give priority to pedestrian and cycle movements, and have access to high quality public transport facilities*
- *create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones*

Since it is proposed the entire space upto the existing road boundary be re-developed, it would be feasible to incorporate modifications for cyclists, this has not been done. Cars have been given priority over cyclists.

According to the plans shown for proposed Station Road West Multi-Storey Car Park Pedestrians are expected to walk across the entrance and exit of the car park. Renderings and diagrams in the consultation show no accommodation for pedestrians crossing these road areas, not even markings.

If this development goes ahead, the road areas over which pedestrians are expected to cross must be marked as pedestrian priorities and signposted to drivers as such.

Development is out of character with character and history of Canterbury

Requirement 58 in section 7 of the NPPF states that:

“Planning policies and decisions should aim to ensure that developments:

- *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation; “*

As one of the main tourist entry points into Canterbury, it is important that any development reflects its local character and history. The proposed design of the car park is clearly out of character with an ancient medieval city and the grandeur of the Cathedral architecture. In order to preserve the heritage of Canterbury, the design should be rejected on this basis.

Development does not improve the character of the area

Requirement 64 in section 7 of the NPPF states that:

“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions”

The proposed development resembles highrise monoblock architecture reminiscent of dense urban sprawl. It misses an opportunity to improve the character of the area, and therefore should be refused.

It would be feasible to design a car park taking up half the space, with underground levels that could free up some of the existing car park for more green space. There is little innovation shown in the design of the building and the poor design worsens the character of the area.

Development destroys local arboreal ecosystem

Requirement 109 in section 11 of the NPPF states that:

“The planning system should contribute to and enhance the natural and local environment by:

- *protecting and enhancing valued landscapes, geological conservation interests and soils;”*

It goes on further in requirement 118 to state that:

“When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- *if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;”*

The proposed development informs us that it requires the destruction of the existing trees:

“The existing mature horse chestnut trees along the front of the existing car park would need to be removed as they are in poor health and the multi-storey car park requires piled foundations which would destroy roots. “

The NPPF guidelines recommend for rejection in the case where damage cannot be

avoided. In this case the developers admit that the trees will be destroyed by the development.

The trees are a cherished feature of the street and should be left intact. The development should be refused if it cannot go ahead without leaving the trees.

No evidence has been provided to backup the developer's claim that the trees are "in poor health" and thus should be taken as speculative.

Development increases air pollution

Requirement 109 in Section 11 of the NPPF indicates that:

"The planning system should contribute to and enhance the natural and local environment by:

- *preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability;"*

The proposed car park development will directly increase air pollution by:

- a) Increasing the influx of cars during AM and PM peaks in-line with commuter train use
- b) Turn the street into a canyon, which encourages the buildup of air pollution [3]

The keywords in the NPPF requirements are "unacceptable risk" and "unacceptable levels". Background modeling of PM2.5 near to Station Road West [5] according to Canterbury City Council for 2016 already exceeds WHO guidelines [6] of 10 ug/m³. As the WHO inform us:

"These are the lowest levels at which total, cardiopulmonary and lung cancer mortality have been shown to increase with more than 95% confidence in response to long-term exposure to PM2.5"

Since current air pollution levels are already harmful to the population of and visitors to Canterbury, the development should be refused because it increases the level of air pollution in the two manners established above. This is even more important because of the enormous pedestrian footfall in the area of the development.

Objections with reference to the Emerging Canterbury Local Plan

The Canterbury local plan is currently under development and is a disparate set of documents and amendments to those documents. The references given here refer to the Canterbury District Local Plan Publication Draft [7], submitted for examination in November 2014 and the amendments proposed in the appendix of the Inspector's Report from June 2017 [8].

Development has a detrimental effect on congestion, road safety, and pollution

Policy TCL6, reference MM69 states that:

“Planning permission for main town centre uses outside the centre boundaries will be granted where the applicant has successfully demonstrated:

- *(d) The proposed development does not have a significant detrimental effect on the highway network in terms of congestion, road safety and pollution.*

“

The proposed development contravenes all these requirements in that:

- It will have a significant detrimental effect on congestion by increasing AM and PM traffic peaks by upto the capacity of the car park, in an area which is already congested.
- It will be of detriment to road-safety by narrowing the road making it more dangerous to cyclists, and by having car part entrances bisecting the pedestrian footpath.
- It will be of detriment to pollution owing to the compounding effects of both increased cars, and the canyon effect that the development will impart to the street.

Based on this, the development proposal should be rejected.

Development increases cross-town traffic and discourages cycling

Policy T1, Reference MM80 of the emerging local plan says:

“In considering the location of new development, or the relocation of existing activities, the Council will always take account of the following principles of the Draft Transport Strategy:

- *a. Controlling the level and environmental impact of vehicular traffic including air quality;*
- *b. Providing alternative modes of transport to the car by extending provision for pedestrians, cyclists and the use of public transport;*
- *c. Reducing cross-town traffic movements in the historic centre of Canterbury;*

“

The proposed development abrogates these principles by:

- a) Encouraging traffic and an increase in air pollution in an already congested area of the city.
- b) Narrows the road affecting cyclists, discourages pedestrians by bisecting pedestrian walkways with car park entrance/exits, and discourages public transport by encouraging car use.
- c) Encourages cross-town traffic by encouraging the use of cars to travel to/from the station rather than alternate means.

On this basis the development should be rejected.

Development does not seek to minimise air pollution

In Section 8.7, Reference MM109 the draft local plan insists that:

“Developments should conserve natural resources, be energy efficient and minimise pollution.”

Furthermore in 8.10, Reference MM113 the draft local plan sets out a table of points which must be considered in terms of sustainability, including under Pollution:

- *Avoiding or minimising any emissions or discharges.*
- *Avoid potentially polluting developments*
- *Avoid/minimize noise, olfactory, air and light pollution*

The development encourages car use and therefore emissions and pollutants and should be rejected on this basis.

This is particularly pertinent since an AQMA is already in place within canterbury for NO2.

Development destroys existing arboreal ecosystem

In Section 8.10, Reference MM113 the draft local plan sets out a table of points which must be considered in terms of sustainability, including, under Ecology and Landscape:

- *Conservation and retention of high quality natural features (trees, hedgerows, watercourses, water bodies etc.) and the contribution made to increasing and enhancing biodiversity*
- *Biodiversity – impact loss of habitat, trees, features*

The proposed development informs us that it requires the destruction of the existing trees:

“The existing mature horse chestnut trees along the front of the existing car park would need to be removed as they are in poor health and the multi-storey car park requires piled foundations which would destroy roots. “

The trees are a cherished feature of the street and should be left intact. The development should be refused if it cannot go ahead without leaving the trees intact.

No evidence has been provided to backup the developer’s claim that the trees are “in poor health” and thus should be taken as speculative.

Development gives priority to cars over pedestrians and cyclists

In Section 8.10, Reference MM113 the draft local plan sets out a table of points which must be considered in terms of sustainability, including, under Transport:

- *A safe circulation system for vehicles, pedestrians and cyclists with priority clearly given to pedestrian and cycling safety and links to public transport nodes*
- *Bicycle storage*

Despite a clear preference hierarchy for pedestrians and cyclists, pedestrians are forced to walk over the entrance and exits of the car park, which gives priority to cars.

The proposed Station Road West Multi-Storey Car Park consultation document states “*Cycle racks and seating would also be provided where space is available*”. Therefore no commitment is given that bicycle storage will even exist.

Development detracts from the distinctive character of the Canterbury District

Policy DB3, Reference MM116 indicates that:

“The distinctive character, diversity and quality of the Canterbury District will be promoted, protected and enhanced through high quality, sustainable inclusive, design, which, reinforces and positively contributes to its local context creating attractive, inspiring and safe places.”

The contemporary design and imposing nature of the design is clearly out of character with the majestic city of Canterbury with its cathedral grandeur and deep medieval heritage. The development should not be permitted in its current form.

References

- [1] National Institute for Health Care and Excellence and Public Health England, "Air pollution: outdoor air quality and health, NICE guideline." 30-Jun-2017 [Online]. Available: <https://www.nice.org.uk/guidance/ng70>
- [2] Canterbury City Council, "The Impact of High Speed One Scrutiny Review – Final Report." Dec-2011 [Online]. Available: <https://www.canterbury.gov.uk/media/533824/HS1-Final-report-and-appendicies-2.pdf>
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- [6] Who, World Health Organization, UNAIDS, and Who Regional Office, *Air Quality Guidelines: Global Update 2005*. World Health Organization, 2006.
- [7] Canterbury City Council, "Canterbury District Local Plan Publication Draft." 2014 [Online]. Available: <https://www.canterbury.gov.uk/media/941559/CDLP-11-Canterbury-District-Local-Plan-Publication-Draft-June-2014-with-maps-CCC.pdf>
- [8] The Planning Inspectorate, "Report on the Examination of the Canterbury District Local Plan (APPENDIX)." Jun-2017 [Online]. Available: <https://www.canterbury.gov.uk/media/1497764/Inspectors-Main-Modifications-June-2017.pdf>