

SECTION 5 - Response to the Transport Assessment.

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RESPONSE TO THE TRANSPORT ASSESSMENT

(a) Introduction

We are aware of the response by the St Thomas Hill residents group to the Public Consultation on the Draft Development Brief for the Business Innovation Centre in 2004 and the objection to the planning application for the first stage of the development of the Business Innovation Park in 2007 (attached as Appendices 1 and 2). We concur with the views expressed in those letters and very much regret that we did not all take part in those submissions, one of the reasons being the lack of information on the developments given to local residents as outlined in Appendices 1 and 2. Many of the issues raised have now come to pass or are obvious from the present application. In particular the first stage is undoubtedly an ugly massive wall, the attractive hillside is now wrecked, and the use appears to be generally unrelated to the University and innovation – it is just an out of town unsustainable business park with excessive parking provision.

Having spoilt one attractive hillside the case for despoiling another, doing further damage to our beautiful historic city and joining the University to the residential area must be considered much more carefully, as we have indicated in other sections of our submission.

For this present development an outline traffic appraisal has, at last, been provided for the whole Business Innovation Park, albeit described as a ‘worst case’ scenario. This shows a serious overloading of the St Thomas Hill / University Road junction even using some ‘favourable’ assumptions. Furthermore, while we take issue later with the ‘worst case’ scenario, the lack of a full Master Plan for all the University developments and the full analysis of all the traffic impacts is a serious omission. We note also that in the University’s Estates Strategy the sale of land for general housing has been mentioned as a possibility (see Section 2(g) of this submission, ‘History and Planning Policies relating to the Site’).

The development of a proper long term master plan for the University considering the impact on the environment, traffic, transport, parking, commercial, economic and social effects on the whole city should be properly considered before any piecemeal developments are considered, especially such large scale development as this hotel and the accommodation blocks.

(b) Traffic impact and ‘worst case’ scenario

Rather than work from the Traffic Impact Statement included within the application documents we have been provided with the consultants ‘full’ traffic appraisal including detailed data and the traffic modelling. We had requested this much earlier and it was only provided after considerable chasing and far too close to the closing date for submissions on the planning application to do full justice to our case. We have accordingly left a number of queries which we trust that the experts in the County and District Councils will be able to clarify fully.

We agree that the traffic impact of the student accommodation will be very small except at the beginning and end of term and for visitors to students from other parts

of Canterbury or Kent. Parking problems, despite the best efforts of the various control measures suggested, could occur, as discussed later, and other locations for student accommodation would reduce such problems, reduce social and disturbance problems and potentially increase the viability and use of the bus services.

While we understand the University's interest in a conference hotel from a commercial property owner's profit point of view, an alternative strategy also better integrated with the whole city's hotel and tourism strategy and with the University's other facilities should be followed. This is described in other parts of our submission and in section (c) below.

The traffic generation from the hotel conference centre is shown on its own not to be critical by the consultants. However they appear to assume a maximum of 200-250 conference guests despite a potential number of guests up to 500. Furthermore it appears that they have allowed the car park to be more than half full before the morning peak (122 out of 205 spaces) and so the additional conference traffic to the hotel seems to be artificially low.

As far as the direction of travel to the conference hotel is concerned, it has been assumed that 65% would come off the A2 through Rough Common and turn left into University Road. While this is the quickest route from the west, and GPS systems would tend to route people via this route, we would suggest that the signposted route would encourage conference visitors to use London Road, Whitstable Road and St Thomas Hill, then make a right turn into University Road. This right turn would also be made by people arriving by taxi, scheduled bus, or conference minibus (should one be provided).

We would suggest that the potential undercounting of morning peak arrivals and the routing could substantially underestimate the impact on the capacity of the junction.

Within the Transport Assessment document there is a print-out of modelled queue lengths, delays and reserve capacities at the St Thomas Hill / Whitstable Road junction (Appendix G of Transport Appraisal). While none of us have first-hand experience of using the TRL model, it appears to show that, for the right turn from St Thomas Hill into University Road, right-turning traffic would not hold up the straight-on movement going north. This may be the case if only a few vehicles are queuing to turn right, but is unlikely to remain true if we take into account the gradient and the fact that buses making right turns would be unable to pull away quickly, creating longer queues extending down the hill. Another relevant factor would be pedestrians and particularly school children coming from north Canterbury to the schools and crossing University Road. We are not sure if these effects have been properly considered. Even at present, queues sometimes extend some way down St Thomas Hill during the morning peak.

The combined effect of these possible 'favourable' assumptions used by the consultant could cause problems with the hotel and conference centre on their own without the rest of the business park.

The consultants 'worst case' scenario shows significant congestion problems at the St Thomas Hill / University Road junction. They also 'pass the buck' on such problems for the next development at the Business Innovation Park to solve.

We contend that whether or not the further development of the business park goes ahead, it is a commitment at present and has a full status in the Canterbury development plan so is really a 'base case' rather than a 'worst case'. A real or worst case scenario would more properly be based on all the planned developments included in a University master plan, together with other long term plans for the Canterbury district.

The consultants' analysis of the so called 'worst case' scenario, in addition to the comments on the hotel as described above, makes the favourable assumption of lower traffic generation from the business park, as it is assumed to be high tech, and the lower number of parking spaces (542 rather than up to 760). We know that at present the occupants are far from high tech and so the extra traffic could easily be nearly 50% greater than their predictions.

Apart from the potential serious underestimation of the traffic effects at the St Thomas Hill / University Road junction, there would be problems at the Giles Lane / Whitstable Road junction, and problems for residents exiting from properties or crossing the road on foot, all along Whitstable Road and particularly on the gradient of St Thomas Hill.

(c) Impact of alternative sites

This subject is discussed in more detail elsewhere in our submission (Section 4) but where there is a transport or traffic impact we have drawn attention to the much less harmful effect of potential alternative sites for the student accommodation and hotel.

It is normal planning practice to consider the most appropriate sites first, avoiding green field or environmentally attractive sites. For student accommodation there is substantial scope to add to the existing development in Parkwood, particularly the car parks which are genuinely brown field sites. There are also other sites to the north of the University which would do far less harm in visual intrusion terms.

Providing student accommodation in such areas would have the added advantages that:

- students would find that the nearest point they could leave their cars would be much further away, reducing the incentive for students to have cars and the pressure on the University to enforce the no-car policy;
- the numbers of students using the buses to get into town from the end of the route would increase, improving the viability and quality of the bus services for all;
- anti-social behaviour by students walking from the town centre to the nearby Chaucer Fields accommodation would be reduced (walking over short distances when drunk or disorderly is easier and a greater temptation).

For hotel developments it is understood that there are a number of approved applications elsewhere within Canterbury city. There are also potential brown field sites (eg Wincheap) which could accommodate any sort or size of hotel including a conference centre. Such location would have potential for more sustainable transport and support the overall economy of the city better (including shopping and restaurants).

If a conference hotel on the University is really a high priority for Canterbury city, its better integration with other University facilities would be helpful. The area where the Estates Department is currently located is one obvious site. The Estates office is apparently in poor condition and does not make good use of the site so it is a potential brown field site. It also seems that the traffic impact of completing the business park would cause considerable traffic problems such that it could not be satisfactorily implemented. As irreparable damage has already been done to that green field site, a hotel may now be an appropriate use. Both these sites are close to other existing University student accommodation, to provide potential extra delegate accommodation, and much closer to other lecture theatres, seminar rooms etc. Accordingly they would make more sense and provide a better return to the University.

(d) Road Safety

As described above, the right turn into University Road will become significantly more difficult or even seriously congested. With the hill start, a number of cycles and other vehicles speeding down St Thomas Hill, reduced braking on the slope, and child and other pedestrians crossing, the intensification of traffic at this junction is a real potential hazard. The generous geometry, with large corner radii, also encourages fast left turns in and out of University Road, posing a further danger to pedestrians and particularly child pedestrians.

In addition, as already pointed out, exiting from private properties on St Thomas Hill is already difficult and potentially dangerous and has got noticeably worse over the last few years with the increasing traffic flow (reported in the consultant's Transport Appraisal). This is particularly true for people wishing to turn right. Further traffic increases for the hotel and business park will add considerably to such potential hazards for residents and visitors to the area.

(e) Parking

We welcome the University's no car policy for students and also recognise the importance of limiting parking spaces to limit car trips and encourage sustainable transport. Unfortunately, not providing parking in order to limit traffic is a difficult message to get across to students, staff, visitors and indeed some council officers and members. People are also generally personally selfish and want freedom to park their own cars anywhere convenient and for no charge.

We note that the University's Travel Plan has been quite successful, mainly as a result of the vastly improved bus service from the town centre, but could be greatly improved by managing parking effectively. Traffic volumes in the area are still

increasing, which is certainly not a desirable or acceptable situation for a historic city like Canterbury.

Typical car parking charging rates for staff are less than £50 per year when the real cost of a parking space is nearly that per month - effectively subsidising staff to travel by car. No attempt has been made to ration or charge for car parking for the business park. (Note that this was a suggestion made in the St Thomas Hill submission on the application - see Appendix 2). This application makes no firm commitment to the pricing of parking with a view to creating a level playing field between those driving to the hotel and those using sustainable modes of transport, nor does it consider a design which could cope with a robust parking management strategy.

While we might accept that the strategy to control students bringing cars to the University is fairly innovative, its enforcement in practice may well be highly problematic. For example, what entitlement does the University have to search DVLA records for the owner of any car parked on the public highway? Furthermore, if the car in question were owned by a member of the student's family (e.g. an in-law with a different name), what enforcement action could be taken? The difficulties would be further compounded if there were only a few reports of abuse, or if the student had special circumstances for use of the car. With an alternative location of student accommodation in the Parkwood area the difficulties of students having cars in Canterbury and the possibility of monitoring them would be much greater and so they would be much less likely to flout the University rules.

(f) Conclusions

From the points of view of traffic, transport and parking, the proposed hotel and student accommodation (and indeed the Innovation Centre/ Business Park) are in the wrong places for Canterbury city and the University. The traffic, safety, transport and sustainability of the proposals are seriously damaging.

As shown elsewhere in our submission, the proposed development is also in the wrong position for environmental, architectural, open space and a wide variety of other reasons. The planning application should be rejected on all or any of these grounds and an alternative well-thought-through strategy should be developed by the University in consultation with local residents and the Council in the form of a Master Plan.

APPENDIX 1

Mr Ian Brown
Head of Regeneration and Economic Development
Canterbury City Council
Military Rd
Kent CT1 1YW

30 - 7 - 2004

(Case Officer –Peter Jarvis)

Dear Mr Brown

Public Consultation – Draft Development Brief, Business Innovation Centre, University of Kent

I have just heard about these proposals through others who have also learnt through the grapevine.

I am obviously disappointed that as I live in the immediate area and have a direct border with the University I have had no direct information and have seen no notices in the vicinity. This is a very sizeable proposal which has an impact throughout north Canterbury and effects views from areas in all quadrants of the City. As presently envisaged it would also cause serious traffic problems and do permanent damage to the visual environment of this beautiful City.

On this basis, before the City Council's Executive discuss the proposal, it would be reasonable to hold a well advertised public meeting or at least an advertised exhibition with arrangements for questions to be raised by the public. I would be grateful if you or the University/SEEDA/developer could make arrangements for this.

Despite the short notice I have had to study the proposals and make representations I have been able to track down the 'Consultation' and 'Development Brief' documents on the web and have the following comments on the proposals, general development of Canterbury and specific development of the 'University Site':-

1.The Principle of an innovation centre

I understand and support the principle of having an Innovation Centre adjoining the University however it must be a genuine innovation centre and not just another outdated, unsustainable and car dominated business park. It should also not spoil the landscape. Its location within the overall University site needs to be looked at in an Integrated Holistic way.

2.Transport

Sustainable principles are outlined on page 14 of the Development Brief and specifically it is mentioned that "The objectives of PPG13 are to reduce the need to travel by integrating planning and transport at all levels ---". I do not believe any serious attempt has been made to do this in the choice of site within the whole UKC site or in the planning of the road and parking system for the site or in its vicinity. My conclusion on this is further evidenced by the statements on page 11 of the Development Brief which show that most of the transport issues have not been looked at – "This issue will be addressed by the travel plan", "the capacity of this junction would require assessment as part of the transport assessment---", "measures to

encourage a transfer from car travel to bus travel would be evaluated within the Transport assessment”.

I note that there are well over 500 parking spaces planned and a potential workforce and visitor population of about 1000. The traffic situation in north Canterbury will become chaotic and dangerous and furthermore the layout of the site would encourage car use. Statements such as “Potential opportunities exist to incorporate ‘Park and Ride’ facility---” (para 3.3) are unreal.

As a transport specialist with specific knowledge, experience and understanding of all aspects of transport planning, traffic engineering and more recently travel planning, the transport proposals are fundamentally flawed. I would be pleased to describe this in detail to your Executive or work with your professional planning and transport teams to identify and clarify the issues.

3. Site location and impact

The site in its present form is enjoyed by many residents of Canterbury (including several thousand students) on formal and informal footpaths and from more distant vantage points it forms an important part of the overall scenery and general environment of green spaces around north Canterbury. It’s development would also mean the loss of easily accessible sports fields at a time the country has at last realised we need to encourage more active exercise and stop the loss of sports fields. The development brief claims other sites have been investigated but no evidence is provided of any appraisal.

Canterbury has a number of potential Brownfield sites including vast areas of underused land for private and public parking in the town centre and the ‘shopping parks’ East and West close to the A28. The university itself has a large car park to the north at the eastern end of Giles Lane which would be a much better site and which could be used much more intensively with much less detriment to the environment and helping to allow an integrated travel plan to work for the whole campus.

While it would be highly desirable to remove some of the outbuildings from the listed building of Beverley Farm the setting of the farm within the ‘business park’ approach to this innovation centre will not meet City Council policies of enhancement.

4. Other matters

I understand that there is a long history on the development of the University Campus and have been advised that a case is being made that it was always planned to develop more of the land for University uses. The original creation of the University was in a very different planning environment which would not be acceptable today. Also since that time a range of new universities have been created possibly obviating the need for the original development. Furthermore the site is in public ownership and should be protected from unnecessary development by all tiers of government in the wider public interest - not just in an Estates and a financial planning interest of the University.

Related to this comment I have also been advised that the University are considering the possibility of a hotel on the lower slopes on the other side of the university road. While I have already mentioned some criticisms of the transport arrangements it is surprising that a roundabout is planned for one of the accesses to the innovation centre but not the other one. If

this roundabout is being planned in advance for access to a hotel in this location an access road on the other key site on the northern slopes of Canterbury would indeed be worrying.

As mentioned earlier I would be pleased to take part in any further discussions on these proposals but as presently envisaged I believe they are highly objectionable on National, County and City Council policies and the best interests of all Canterbury residents and visitors.

APPENDIX 2

Mr Kim Bennett
Head of Development and Planning
Canterbury City Council
Military Rd
Kent CT1 1YW

8 - 3 - 2007

(Case Officer – Katie Miller)

Dear Mr Bennett

Planning Application No. CAN/07/00153/CAN Business Innovation Centre, University of Kent

I and most of our immediate neighbours are very disappointed not to have been informed directly of this application or even to have heard any more about this proposal since my letter of 30th July 2004 (copy attached to covering e-mail). Despite that previous letter and being in very close proximity to the site (with a direct boundary and direct access to the publicly available open space around the University) and walking over the site itself it at least once a week, I have only just heard about this application (only four out of the twelve of us received notification).

My previous comments, albeit on the basis of my knowledge of the previous version of the Local Plan, still hold following a review of the documents related to the planning application and the new Local Plan. Furthermore I would very much appreciate the opportunity of making these points and the additional points outlined in this letter personally to the Council's Planning Committee.

General comments

1. This first stage of the proposal should not be considered in isolation of the total proposals for the business centre for the reasons of integrated planning, ensuring the full traffic impacts are properly assessed for the whole development and the case against the rest of the development could be weakened. Once the first stage is built as a very significant part of environmental and landscape damage will have been done with the first stage. This is covered further in the detail points below.
2. The initial stage and the full scheme are so much against the principles of sustainable development and particularly since the publication of the Stern Report (post Local Plan publication) that it is probably appropriate for this and the full site application to be considered by the Secretary of State at a Public Inquiry. Furthermore as the development involves public authorities the only sure way to ensure public scrutiny has been seen to be carried out is by an independent appraisal at such an Inquiry.

Sustainability traffic and parking

3. I have insufficient time to look at the full Transport Assessment especially as it is not available on the web. However I am aware that this site is unsuitable for access by sustainable transport and that there is already very significant traffic congestion at peak periods in both directions on Whitstable Road/St Thomas Hill and University Road; an extra 500 plus parking spaces and 1000 people working or visiting the whole development would cause very serious congestion, and safety problems for vehicles. Even more important it would result in reduced opportunities to cross the roads and hence cause safety problems for pedestrians, and particularly children, going to the schools in the area.
4. Guidance documents on Travel Plans all advise that Travel Plans can never make badly connected sites acceptable - this site certainly is not suitable for sustainable travel. Furthermore the travel plan as submitted is woefully inadequate to even try and achieve a reasonably sustainable modal split – the Travel Plan document is just an aspirational. hope. Neither the Transport Assessment nor the Travel Plan take into consideration the whole University travel requirements as required under policy C20 (*Major development proposals at the University shall be subject to a transport assessment, within the context of the existing transport impact of the of the University, and preparation of a Travel Plan*). I understand that you may be receiving further documents on this and would wish to make further representations when these documents are available. Similarly the proposal does not seem to conform in any respect to policies C21, 22 or 23
5. Notwithstanding my comments that the whole development should be considered as one (see above), the 137 parking spaces allowed for 170 staff are tantamount to admission that the majority of workers on the site would travel by car producing yet another unsustainable development. 137 spaces are in any case in excess of the maximum Kent and Medway 2006 parking standards for business use for offices over 2500 sq m. Furthermore this number of spaces is several times the number to meet the requirement of both policies C21e and C23e - that spaces should be ‘kept to the operational minimum’.

Impact on landscape and environment

- 6 The council policy (R7) and proposal map identifies the whole University Campus as an area of high landscape value; this slope together with Beverley farm must be one of the areas of highest landscape value within the campus. You will note in my 2004 letter I did identify a much more suitable site within the University campus (on the north side of the eastern end of Giles Lane) that is if a business park is really needed on the campus itself. I contend that the first stage of this development would do ‘unacceptable harm’ to the landscape. Furthermore the stark nature of the development ‘wall’ of the first stage will do harm to the outstanding building of Beverley farm; at this stage I have not been able to ascertain whether it is listed and other policies would apply. The establishment of the ‘wall’ would weaken the arguments against subsequent development of the business park partially hidden behind the ‘wall’. The staged development seems to be an underhand way of starting this whole unsuitable development by the developer; no public body should approach or be allowed to approach planning in such a way.

Economic development and needs of innovation centre and high quality B1 space

- 7 I recognise that the new version of the Canterbury Local Plan gives much greater weighting to:
- proposals for economic development,
 - specifically include development of an innovation centre linked to the Higher Education facilities and also
 - point to the lack of high quality office space.

But the Local Plan also stresses the importance of sustainability and protection of natural and built environment.

Following the Stern report the sustainability considerations are of even greater import. Anywhere else in Canterbury is close enough to both the major academic institutions to meet the needs of the 'innovation centre'. For any office development to be sustainable, even in a large city, it needs to be closely associated with major public transport hubs and shopping facilities. There are more than adequate sites within the regeneration areas included in the Local Plan, or other already publicly owned sites in and around the City centre (e.g. car parks - please see July 2004 letter), to allow the development of 3870 square metres of B1 space and almost certainly for the rest of the whole scheme and other B1 needs in Canterbury. The use of this site or any site for a business park within the University would be folly until such other sites are brought into proper use. At the very least there are much more suitable sites within the University Campus which would meet the quoted needs better.

As mentioned in my previous letter I would be pleased to take part in any further discussions on these proposals but as presently envisaged I believe they are highly objectionable on National, County and City Council policies and the best interests of all Canterbury residents and visitors.

I have discussed the contents of (and received contributions to) this letter with other immediate residents and can confirm that:-

Mrs AMJ Elliott of 20 St Thomas Hill
Mr G Cryer of 3 Humpty Dumpty Meadow St Thomas Hill
Mrs J. Cryer of 3 Humpty Dumpty Meadow St Thomas Hill
Mr P. Bushell of 18 St Thomas Hill
Mrs A. Bushell of 18 St Thomas Hill
Mr M Boutorabi of 1 Humpty Dumpty Meadow 24 St Thomas Hill
Mr M Boutorabi of 1 Humpty Dumpty Meadow 24 St Thomas Hill
Mr K Kamalvand of 14 St Thomas Hill
Mrs E. Kamalvand of 14 St Thomas Hill
Mr O Hajilou of 22 St Thomas Hill
Mrs N Hajilou of 22 St Thomas Hill

support the content of this letter.

Yours sincerely,

John Elliott
On behalf of those named above

cc. All listed above
Ward Councillors: St Stephens, Westgate and Blean