

The Wincheap Society

Comments on the implications for the Canterbury District Local Plan of the High Court decision in *ClientEarth (No.2) v Secretary of State for the Environment, Food and Rural Affairs [2016] EWHC 2740 (Admin)*

Air quality is an issue of rising concern in the Wincheap area owing to the high degree of traffic congestion on Wincheap itself (A28) at many times of the day and night and our growing awareness of its impact on our health.

As we have stated in previous submissions to the Planning Inspector, there is a bottleneck for traffic in both directions under the railway bridge into and out of the Wincheap roundabout, and tailbacks for a considerable distance from this point are frequent. Stationary traffic with engines running is a feature of this street on weekdays and at weekends. There has never been an air quality monitoring station in the area although it lies in an Air Quality Management Area.

When we submitted our response to the amendments to the Draft Local Plan on 15th January 2016, we drew the Inspector's attention to the inevitable increase in traffic congestion on Wincheap – and hence in air pollution – which any new developments in the Thanington area would cause. Many properties in Wincheap and the surrounding area have front doors opening directly onto the narrow pavements, meaning residents are highly exposed to such pollution. There is also a children's play area with the entrance and exit directly on Wincheap.

The diversion of traffic off Wincheap at Cow Lane and through the industrial estate as a relief road has been promised, but no commitment has been made to implement this before any construction work takes place in Thanington and before a new slip road off the southbound A2 is built. We should add that there is a day care centre and bowling alley close to the street on the proposed relief road, so there is an urgent need to reduce the amount of traffic and consequent emissions detrimental to health, especially that of young children, even when traffic has been diverted off Wincheap for some of its extent.

We wholeheartedly endorse Prof. Stephen Peckham's Further observations on air quality related to the Canterbury District Local Plan resulting from the recent judgement by the High Court in *ClientEarth (No.2) v Secretary of State for the Environment, Food and Rural Affairs [2016] EWHC 2740 (Admin)*. He notes that **current emissions modelling underestimates actual future emissions** and that "*in particular, air quality in Wincheap and along sections of the A2050 and A28 breach limits set by the Air Quality Directive 2008/50/EC. These lie within the current AQMA, which covers these roads within the city.*" (13.)

Canterbury City Council's Draft Local Plan lacks any substantive plans for the alleviation of air pollution in the city. We therefore appeal to the Inspector to require the Council to carry out a full Health Impact Assessment of the Draft Local Plan and establish a clear Air Quality Action Plan, demonstrating how air pollution will be reduced and maintained within the limits set by the Air Quality Directive 2008/50/EC.

6th December 2016