

Dear Sirs,

The format suggested for responses is unsuitably worded for what we wish to say, especially as our CPRE Kent Branch Director, Hilary Newport has already responded generically - ID ANON-TWTA-YWBE-Q. I write on behalf of the Canterbury District Committee of CPRE Kent and wish to comment as follows on the Air Quality problem as it affects Canterbury specifically.

1. Following our messages to and from your Air Quality team, we are most surprised and concerned that Canterbury is still not on your list of towns and cities which appears in the Consultation Document. We assume this is because Canterbury City Council (CCC) has not presented you with an up-to-date Air Action Plan, since its former one, now 8 years old. In the intervening period, the AQMAs have become even more polluted due to the increasing number of vehicles within and around the City.

2. We made strong representations about Air Quality to the Inspector (Michael Moore) who presided over the Canterbury Draft Local Plan Examination, but he was given no up-to-date information about Air Quality by CCC during the Examination. Mr. Moore's report into the draft Plan is still awaited, but he has expressed his concerns in writing to CCC.

3. Only this year, 2017, the CCC Councillors who represent Wards within the City (Canterbury Area Members Panel) resolved to recommend to the full City Council that Canterbury should have one traffic-free day each week to allow for the dispersal of the worst of the pollution, but regrettably the full Council would not adopt that resolution and decided that only Kent County Council Highways could make that decision. KCC Highways have taken no action whatsoever, so far as we are aware.

4. Despite representations made by us and others about the proposals some time ago by CCC to merge the then separate AQMAs into one enormous AQMA, CCC went ahead and created one new AQMA. This makes it difficult for the problems in different parts of the City to be tackled individually, and also makes it impossible for the escalating pollution to be accurately monitored. We should tell you that little, if any, of the monitoring equipment used by CCC records diesel particulates, and, furthermore, in our view it is not present in areas where new air quality problems have arisen. Nor is there sufficient equipment to provide the necessary monitoring.

5. You should note that one of worst polluted areas is in Military Road which passes an adjacent Primary School, whose head teacher has expressed his concerns for the health of his staff and children. Furthermore, Military Road is bounded and surrounded by quite intensive residential property. Another badly polluted area is St. Dunstan's Street, where there is a railway level crossing coupled with very regular polluting diesel buses. The crossing closures result sometimes in traffic waiting for up to 5 minutes, with long queues of vehicles in both directions. Even one of the City Councillors has stated at a CCC Planning Meeting that one of his elderly relatives visiting St. Dunstan's Street was so badly affected by the traffic fumes that he had to withdraw. Again, this area is intensively residential.

6. You should also note that Canterbury basically sits in a bowl on the floodplain of the River Stour with higher land around, so that when cloud cover is low, or during conditions of extreme heat, traffic fumes are unable to dissipate and the City suffers from even worse pollution than usual. Geological situations should always be taken into account where they worsen existing bad pollution. Such areas will often have medieval street plans, like Canterbury, which trap fumes more than modern, wider, roads, which also may adversely affect the fabric of historic buildings and World Heritage Sites. Virtually the whole of the City Area is filled by Conservation Areas, and there are

three World Heritage buildings, Canterbury Cathedral, St. Augustine's Abbey and St. Martin's Church.

7. In the Canterbury Draft Local Plan there are proposals for development on the edges of the City, directly adjoining intensively developed built-up areas, which potentially would bring a minimum of an additional 25000 (twenty-five thousand) vehicle movements in the City on a daily basis. and which would increase Canterbury's population by at least 25%. There are no remedies proposed for lessening the traffic fumes which would result, apart from the provision of cycle routes, footpaths and a "fast" bus supply.

8. We should like the Government to impose the following conditions upon local authorities throughout the country so that, nationally, the serious dangers to public health can be lessened - resulting, incidentally, in massive savings within the NHS in the treatment of lung and heart related diseases which are caused by air pollution.

a. A traffic free day once each week, apart from PSVs and vehicles for disabled/sick persons. Travelling by Public Transport should be free on those days.

b. Illuminated signs at the entries to each large town and city preventing vehicles entering when the pollution exceeds statutory limits.

c. Publicity requiring drivers to switch off their engines when stationary for more than, say, 20 seconds.

d. A ban on diesel-engined buses in city and town centres.

e. More traffic officers on patrol to check readings from diesel and petrol engined vehicles, with powers to ensure that those vehicles with polluting levels are not used until either scrapped or appropriately repaired.

f. Publicity on television and other media outlets - on a very regular basis (similar to the alcohol/drug and tobacco smoking campaigns - warning people of the dangers to public health and persuading them to use Public Transport.

g. Separation, by physical barriers, of cycle routes from roads. At present, people local to Canterbury are dissuaded from using cycles to travel to the City because of the dangers from vehicles. There are frequent accidents involving cycles.

h. No driving licences to be issued unless the driver produces a certificate of competence in riding a cycle/tricycle.

i. Every Local Authority to be required to acquire, keep maintained, and use at the AQMA hotspots during peak traffic flow hours, at least twice every week, air monitoring equipment that provides readings for all pollutants, especially including diesel particulates, and for readings to be displayed prominently - we would suggest in local newspapers, free of advertising costs.

We are sure you will have heard similar representations from others and also other solutions that we do not mention. You should aim for a sea change in public attitudes towards the use of cars.

Finally, at a time when we have all been horrified by the terrible fire in West London, may we remind you that up to 40000 deaths in the UK each year are said by medical experts to be caused or

hastened by traffic pollution, yet, because air pollution is invisible it is convenient for Government and Local Authorities to just pay lip service to the problem. If vehicle manufacturers and fuel producers were legally required to include colouring agents in the fuel used, resulting in coloured exhaust fumes, this would give a salutary warning of the dangers caused.

As we have found the Consultation form unsuitable for our purpose, we ask you to formally acknowledge this message, to pass it to the Section dealing with the matter and to notify us of the person within that Section in charge of collating the responses. Thank you.

Yours faithfully,

Barrie Gore, Acting Chairman, Canterbury District Committee, CPRE Kent, Queen's Head House, Ashford Road, Charing, Ashford, Kent, TN27 0AD