

# SAVE SAINT PAUL'S

A precis of objections supporting the campaign against the KCC

**Pencester Road, Dover, proposed northbound bus contraflow.**

## 1. Administrative failures.

- i) A traffic survey was not carried out, to establish volume, nature, and timing of traffic bottlenecks.
- ii) The scheme makes no attempt to estimate the inevitable growth in car ownership, and all forms of commercial traffic using Dover Town centre roads during forthcoming years nor the impact that growth will have on this scheme and the roads capacity to accommodate it. Most of the affected roads are already close to saturation, and in very poor condition.
- iii) The equality impact assessment (EQIA) submission disclosed alongside the consultation document has no validity in the survey, because it primarily uses cut and paste from the KCC over-positive quotes contained in the scheme consultation document. The EQIA deals mainly with the construction phase and ignores the long-term impact on the affected locality and minority groups (stakeholders), i.e:
  - a) Age
  - b) Disability
  - c) Faith and religion
  - d) Parents with child
- iv) Stakeholder groups were not consulted. The EQIA identifies only two stakeholders, Dover District Council, and Stagecoach. Local groups affected by it were neither identified nor contacted.
- v) When this scheme was conceived years ago; its original and stated **PREFERRED** route was quite different. KCC dishonestly claim the change of route to then create a contra-flow in Pencester Road, so to facilitate direct bus access into Maison Dieu Road, was born out of a realisation that the preferred route might become subject to circumstances of delay outside their control, those circumstances were well known to KCC before they named the preferred route. Having changed their mind to a more controversial route they chose NOT to reveal it publicly. No doubt because they knew it would be vigorously opposed. To minimise the chances of successful opposition KCC left it until 17<sup>th</sup> November 2023 to publish it and open it for consultation, **BUT** allowing only a **24-day** window, and compelling objectors to register on the KCC website before being eligible to enter objections. KCC have made it as difficult as they possibly can for objections to be made to a scheme that they intend will be in place by April 2024, only six months after consultation was offered, knowing also that construction was estimated to take four out those six months. Plain evidence that KCC intend this scheme to be implemented no matter the safety risks it encapsulates or its impact on local stakeholder groups, nor the level of other opposition. They see it as a done deal.

## 2. Objections on the basis of safety.

- i) The busiest junction in Dover Town centre, Worthington St, Biggin St, Pencester Rd will change from one-way travel to a two-way TL control for buses, cars and bicycles. The complexity and confusion this will cause, is incalculable, for motorists and cyclists but especially for pedestrians, who will include unaccompanied children, elderly, and disabled, some driving disabled trolleys; a factor not considered in the consultation document.
- ii) Pencester Road contra-flow will facilitate a bus lane allowing buses and cycles to travel NE against the flow of all other traffic, with two new stops for passenger loading and unloading on the NW kerb. The separation of contraflow traffic to be achieved by painting white lines on the road. It doesn't say if the white lines are to be "double lines" prohibiting overtaking, or single lines as shown on the plans. Double lines or not it is naïve in the extreme to assume that cyclists stuck behind a stationary bus loading or unloading large numbers of passengers is going to wait patiently until the bus resumes. Cyclists will pull into the contraflow lane and attempt to overtake so confronting oncoming traffic of all kinds, as well as pedestrians crossing from either side who will have no idea of what direction to look for dangers. Or cyclists will decide to take to the narrowed footpaths crowded with bus passengers and pedestrians so to pass the stationary buses. The risks in either action couldn't be assessed by the best bookmaker.
- iii) The plans show no intent to seek a 20 MPH speed limit for the road; that at least would demonstrate an awareness on the part of planners that some risk exists in the scheme. Clearly, they see none, they must view it as completely safe!!!!
- iv) As a local motorist using Pencester Road almost daily I am constantly aware of pedestrians of all ages and states of mobility seeking to cross the road, they are always in fear, no doubt caused by the speed, size and intentions of the traffic they face. The contraflow will make this endeavour so much more dangerous, for bus users will now have a reason to rush across the road with diminished attention to risk if their intended bus is arriving on the other side of the road.
- v) Exiting the car park at the NW end of Pencester Rd will become more dangerous because drivers will almost always confront a situation where a stationary bus is sitting at the TL controlling the junction with Maison Dieu Rd (MDR) while traffic from MDR is pouring in. All drivers will be blind to the other traffic thereby imposing a substantial risk of collision, particularly when confronted by a multitude of changes, impatient drivers and pedestrians, so prompting driver stress and a rush to blindly get out of the way. If the plans go through, and that car park becomes the only place for disabled drivers they will be the drivers faced with this situation.
- vi) Dealing with the junction of Maison Dieu Road (MDR) with Pencester Road, (PR) there are multiple safety issues.
  - a) The plan increases to three the number of traffic lights within a 600-metre section of Maison Dieu Rd, (MDR) a main 'A' class route that is critical to the continuous free flow of traffic around the town centre. That traffic already travels faster than is safe for pedestrian road users particularly at the junction with PR, a fact that DDC will refuse to acknowledge but the pedestrian users of that piece of road know to their constant fear. The future of a pedestrian controlled set of TL in MDR a few metres East of the junction with PR is unknown because one set of plans says it will be relocated, another says it will remain. Perhaps KCC want pedestrian users to guess the outcome until after they've rubber stamped the scheme and then they can remove it altogether. Furthermore, the proposed traffic

lights in MDR at the junction with PR, are intended to give bus priority out of PR eastbound but are not intended to have any pedestrian demand. The consequence for pedestrians crossing MDR in either direction is to force them to compete with fast moving traffic, much of which will increase speed to beat the amber inter-green phase; a well-known phenomenon known to police officers. The consultation document does not recognise this as a safety issue anywhere.

- b) The aforementioned risk is magnified exponentially for the elderly, disabled, and parent escorting child.
- c) On the day of important Christian festivals, and every weekend, between Saturday evening and Sunday lunchtime, at the end of services, in St Paul's church, between 60 and 150 people, children, parents with buggies, elderly, disabled, and mobile adults pour from the church onto the small concourse at the front of the building seeking to cross MDR for the town and car park. Daily services have smaller congregations but with a much higher age profile. All are pedestrians facing unassisted crossing of a dangerous road. The risks to all of them could not be calculated, nor are they recognised in any of the KCC documents. The scheme represents a major discrimination of Christians attending St Paul's church.
- d) All churches, St Paul's is not an exception, hold funerals and weddings throughout the year, when large vehicles (hearses etc), necessarily present for the ceremony are stationary outside the church, often for extended periods of time. This will not change, whether this plan is adopted or not; they are integral to the churches' raison d'être. If the plan is adopted those vehicles will be right in the middle of the new controlled area, but in much narrowed traffic lanes, and likely to cause delay for MDR traffic and PR bus egress, and more significantly, will present exponentially increased danger to the vehicle users. The church has no alternative options available because they do not own the narrow lane to the east of the church building. The church has a small car park at the rear which is in very poor repair and gives no access for ANY form of disability.
- e) At present many elderly and or disabled church attendees are dropped off by a driver or taxi outside the church before and after services, allowing the driver then to park elsewhere. If this plan is adopted those vehicles will present the same obstruction as at d) above, and again this will not change, unless elderly and disabled attendees decide not to attend, which will raise the objection that the plan discriminates against aged and disabled people because of the danger it presents to them.
- f) See also item 4), i), a) below.

### 3. **Objections on basis of discrimination.**

- i) Age:
  - a) See 2.vi).b.c.d.e. above, also 4. I), d) below.
- ii) Disability:
  - a) See 2.vi).b.c.d.e. above
  - b) Removal of disabled parking bays in Pencester Road further discriminates against the disabled and will create a competition for places in PR car park at times of high demand.
- iii) Faith and religion:
  - a) See 2.vi).b.c.d.e. above
  - b) See item 5 below.

**4. Objections on the basis of increased obstruction to the flow of traffic throughout the Town and wider area.**

- i) As stated in 2, vi), a) above MDR is a major route within the town and when obstructed, as it has often been, it can bring the traffic flow around the town to a standstill. This scheme encapsulates multiple threats to the free flow. A thorough traffic survey, as commonly conducted prior to introduction of similar schemes would have revealed the threat.
- a) Pedestrian demand upon the proposed PedTL at the NE end of PR must by design stop buses moving out of PR while also stopping all traffic including buses entering PR while pedestrians use that crossing. If KCC plans to integrate a right turn only red light, in order to facilitate continuous flow on the other lane in MDR, then the threat to pedestrians seeking to cross MDR either northerly or southerly is exponentially increased due to the confusion of movement and stoppage it will create for them. Vehicles necessarily stopped outside St Paul's church (see 2. vi), d), e) above) before and after services will block the through lane pushing the traffic onto the PR lane, which will also be stopped (as aforesaid) at unknown intervals but certainly every 5 to 7 minutes or less in peak times, this will have the knock-on effect of a traffic build-up in both lanes, which at peak times is likely to feed back to the 5-ways TL, and possibly back to Charlton. The scheme plan doesn't recognise any of these risks, it blithely assumes the free flow of traffic will be unaffected and that safety risks do not exist. The plans do NOT show an intent for the MDR - PR lights to be multi-function; they only show them as a stop - go for both lanes simultaneously.
- b) The bus lane in PR is to be accessed from Worthington Street (WS) via a bus priority traffic light-controlled junction, but non-bus traffic will also use WS and the junction to access into one-way Biggin Street (BS). The buses, once in PR will stop to load/unload at one of two new stops. At peak times it is inevitable that stationary buses in PR will enforce waiting buses behind to remain in WS until space becomes available in PR, which in turn will back-up to block the junction with York Street (YS). I don't suggest that York Street will be obstructed, but the risk exists that it will if high traffic volumes place two or more buses departing the railway station necessarily to enter a blocked WS. Then the roundabout will be affected along with Folkestone Road. KCC will ignore this risk by choice, but Dover residents who've many times been locked into total grid-lock on Folkestone Road by just such circumstances would like the KCC mandarins to remove head from sand and realise that ignoring the risks, as this plan does, has major impact on people's lives and local business.
- c) The car park in PR is shown in the plan as DDC's answer to all parking problems in the town centre, especially elderly and disabled seeking access to the town shops or to St Paul's church. To access the car park drivers will have to turn right across the new bus lane, but that lane might be blocked by stationary buses waiting at the traffic lights and or pedestrian lights, such a stoppage would then prevent traffic on MDR from entering PR potentially blocking the egress of buses when the lights actually permit it. Once again grid-lock will arise, only resolved when the vehicles can enter the car park, or some dangerous manoeuvring takes

place. Frequent repetition of this eventuality will build a back-log in the MDR south lane or both lanes (see 4. i), a), above).

- d) Still dealing with the PR car park, delays will operate in the reverse of the circumstances illustrated above. When the bus lane is blocked by a bus, or vehicles trying to enter the car park as others try to exit, delay inside the car park will mount. A queue of cars will grow, as seen in other town car parks, and that will impact on the safety of pedestrians using the footpath outside it. The footpath has priority for the safety of pedestrians, but frustrated drivers, entering or leaving are likely to ignore that priority thereby endangering pedestrians, (elderly, disabled, children accompanied and unaccompanied).
- e) Currently the movement of buses and other traffic through PR southbound at peak times becomes congested to the point of backing up to the junction with MDR due to multiple factors, bus movements in and out of bus stands and the Stagecoach private car park, fairground HGVs accessing Pencester Park, commercial vehicles, loading unloading, B & M trucks accessing their unloading bay, the pedestrian lights at the south end in constant demand. Whilst some of the commercial usage will end the pedestrian crossing light demand will increase, bus priority access to PR will stop the flow, so there is an increased probability that backing up will lead to a blocking of entry from MDR into PR, which in turn will slow or block the flow of traffic in MDR and so on backwards, as stated in 4. i), a), above.

**5. Objection based on disruption of tradition in St Paul's church, Maison Dieu Road for a hundred and fifty years.**

The plan will force frequent, possibly prolonged periods of stationary traffic directly outside St Paul's church, which will bring about loud engine noise of heavy goods vehicles and buses causing interference to services, annoyance, and distress to worshippers at the services, that occur multiple times every day.

**6. Objection based on the fact there is an alternative method of achieving the same outcome without causing the disruption and safety risks set out herein; an option considered many years ago but rejected for reasons now capable of simple remedy using cheap and openly available technology.**

7.

- i) Many years ago DDC explored the idea of improving the flow of traffic round the town by turning Ladywell/Park Street (lower end) into one-way traffic northbound as far as Maison Dieu Road, and removing the traffic lights currently at the junction of Biggin Street and Ladywell, so that the traffic would flow freely in three lanes as it does today, to the lights at High Street and Bridge Street where it would break down into three directions, north-west, south-west and north-east. There was one major objection to the idea. The Fire Station based in Ladywell. Following the one-way system then proposed would add 3-5 minutes to the service's attendance time at any fires on the north-east right round to the south-east sides of the town, unacceptable delay. The idea went no further. Such an objection would not now succeed because modern technology would facilitate the traffic lights at the aforesaid junction to remain there, but on permanent green, until the fire service had need to change them to red, which could be achieved remotely from inside the fire station. Fire appliances would then not be delayed at all; they would turn south into Ladywell

- unopposed then right into the High Street, as they do now. Such a scheme would require minor changes to the technology of the lights and the placement of a road sign warning that the lights would go red when the fire service required it, No different from the operation of traffic lights at a railway crossing.
- ii) With the traffic lights on permanent green (except as stated above) flow of traffic from the railway station would be faster as far as the lights with MDR. The right lane could be a bus lane with lights operating a bus priority, again using available technology. Park Street could become three lanes, as it currently is, with the centre lane signed as a right turn into MDR, leaving the left lane to access Godwyne Road, and Park Avenue. On approach to the junction with Pencester Road centre lane and right lane can merge for the right turn into Pencester Road.
  - iii) In this plan there would no need for traffic lights at the junction of MDR and Pencester Road, traffic would flow much more freely than in the KCC scheme and without all the safety risks encapsulated in it.
  - iv) The KCC scheme removes all on-street parking including disabled, relying on Pencester Road car park to compensate for the loss. If bus movements remained as they are today with all buses entering from MDR, the on-street spaces outside the car park and what is now the Taxi stand could become disabled parking and some on-street parking remain on the NE side of Pencester Road, though I would prefer more disabled places.
  - v) The bust stops intended for the new fast-track bus can be outside the B&M store and the locksmiths, allowing space for B & M to access their parking bay, and the private taxis to enter their parking area.
  - vi) There could be an additional stop for the fast-track bus on MDR at Taswell Street, which is currently used by the Deal and Maxton buses.
  - vii) Remove the bus stop in Priory Street for out-of-town buses, Canterbury, Folkestone, Sandwich, and restrict it for Town buses only. This would improve flow around that area, as there are stops in Pencester and nearby in the High street, and Folkestone Road for those passengers on the longer distance journeys.
  - viii) Worthington Street to remain unchanged from its current usage.
  - ix) Pedestrian lights at SE end of Pencester to remain unchanged.
  - x) There are, no doubt other refinements that traffic management specialists could and should add to this idea, but it is the basis of a much less disruptive and safe plan than the KCC scheme.
  - xi) Likewise, if the first preferred route for the Fast-Track bus were resurrected in conjunction with this one-way for Ladywell/Park Street, it could become an alternative route when the preferred route has slowed due to congestion.