

Green = additional spoken text

### Introduction

*Grahame Wickenden MICE FIHT – I am a Chartered Civil Engineer with 40 years’ experience and whilst I semi-retired in 2020 I still take an active part in major project reviews on a freelance basis I have worked across the globe in the promotion, design and construction of major and minor civil engineering and infrastructure projects. Locally, and in this respect, I have led the majority of major infrastructure schemes in Kent and Essex for the last 20 years  
Before joining the private Consultancy sector, I also led the major design teams for Kent County Council and was more recently involved in the most successful UK infrastructure development bids for Essex as part of the largest Private / Public sector joint venture currently active.*

### Summary

In my proof of evidence, I offer my opinion relating to Highway matters and ‘merits tests’ for the Section 247 Stopping Up Order and diversion proposed

From a Highway perspective my concerns are in the following areas:

- The loss of visual / seafront amenity
- The loss of parking and disabled / elderly access
- The effect on the RMC
- Ecological highway aspects
- Traffic, highway alignment and Safety

In summary and in my professional opinion the Stopping up of the existing highway and its proposed realignment would result in a number of harms which I consider ought to lead the Secretary of State to not confirm this Order

### Evidence text

In the main these are summarised in Section 7 – ‘Public objections and the Councils response’ of the Buckles report of May 2021

Buckles Response themes are underlined

3) C) Loss of seafront parking - Any loss here directly impinges on direct seafront access and egress for all, but in particular the elderly or disabled.

Princes Parade is currently heavily used for parking and whilst alternative parking has been offered in the development it is some distance from that currently enjoyed. The report accepts this but does not highlight the distance factor which is crucial for these key user groups

This Disability Discrimination act of 1995 recommends a maximum distance of 50m for several Disability groups (without rest) and a max gradient of 5% (ideally as slack as 2.5 %). Does the Councils provision make such allowances?

I again consider this a de merit and see no adequate mitigation

4)D) Loss of seafront Highway visual amenity - this is not a 'may cause' loss as stated but a 'will' cause loss position. In relation to specific clauses:

D ii) I do not agree with the Council with the Council when they say, the new road improves visual amenity?

D iii) The wider promenade facility is noted but believe the existing promenade width (circa 4m – 5m) to be adequate and indeed I have concerns that the wider prom offered will encourage higher cycling speeds.

D iv) Noted but the statement made has no foundation when the existing visual privilege is provided but the new arrangement will not provide anything like such.

I consider a de merit and non-necessity

5)E) Reduced accessibility to the seafront for people with disabilities – see my opinion above on point C.

-Disabled access to RMC noted but have the Council considered this as a betterment against the more popular promenade use as the existing RMC access tracks are, at times, not conducive to disabled use?

I consider a further de merit with a loss of existing provision

6)F) Adverse impact on setting of the RMC

~~I consider the Council have addressed the concern of the objections to the RMC as a historic monument only and not as the Objections were framed~~

~~These objections were about the wider environment of the RMC and the effects on the Wildlife, user groups and local residents and school. The proposed new road damages these criteria and fail to see how this has been addressed~~

~~Highways wise I remain concerned on how the Surface Water strategies has been created and any deficiencies in design leading to overtopping and spillages cause us great concern as well as health risks~~

~~Flood Risk also links to this with the Councils own Strategic Flood Risk Assessment (SFRA – of 2015) with the site is (or was at publication) in Flood Zone 3a – a zone with the highest probability of Flooding. The highway or increases in hard/ impermeable paved area will exacerbate flood risk to the RMC~~

~~In calculating run-off volumes for design I would anticipate 100years plus a min 30% to 40 % additional allowance for Climate change (The EA could confirm this if required) but note the Councils ES addendum strategy only appears to utilise 100-year events although extreme events and tide locking has been tested but this is not clear.~~

~~It is unclear what specific highway oil interception facilities are to be provided as I am concerned about Canal side pollution. I believe Full retention Oil Interceptors should be provided given site sensitivity~~

~~It is unclear how the existing site based leachates be controlled wrt contamination into the RMC or are barriers proposed alongside the new highway? I accept this is in the status quo, but the highway work will disturb this lower medium.~~

~~I note the Drainage appears undetermined as I am aware a proposal to potentially pump and discharge to the Sea has been considered. I note however the current attenuation details indicate the surface water discharge will be into the Canal, details are unclear.~~

~~In my opinion the above present a significant de merit~~

Based on what I now understand I am happy to remove section 6)F).

I better understand the nuances towards the transfer of circa 4,500 vehicles on the new road.

My section on adverse impact on the setting of the Royal Military Canal I am happy to remove that text, the whole of it.

I maintain there will be an adverse impact on the setting, but I will remove this text.

~~8)H) Noise and air pollution – Diverting vehicles along the re-aligned Princes Parade would impact on existing residents, RMC user groups and the school and unclear if these are considered. I have only seen reference to future residents in reports to date.~~

~~I do not think considerations also been given to the creation of potential 'facade' effects between highway noise created on the new road being cast towards the existing residents. The noise of the new road, together with the facade effect may require acoustic barriers.~~

~~I fail to see how the Council 'contends' this aspect as acceptable. Again, the wider environment has not been addressed at this stage and consider a de merit~~

I will take the same stance on 8)H) as I am on 6 )F) and I will remove that text. I would like to maintain there will be an effect on noise and air pollution of putting 4,500 vehicles on a road that close to the canal.

9)I) Traffic impact to the Highway network - the reports and addenda address the traffic impact in 2023 (assume 'year of opening'?) but there appears to have been no consideration of the usage in 10 or 20 years and effects on the local network.

These factors are, in my opinion, critical as day of opening maybe adequate but further local growth will alter this balance without wider highway improvements. I am particularly concerned about dispersed traffic that would now chose not to go through a traffic calmed corridor as is the national norm

In my professional opinion the Secretary of State needs to be satisfied on the following matters:

It is unclear how will the existing eastern (Sandgate) junction perform to incorporate variable flows, mixed use, pedestrian and cycle safety and access / egress to the new road.

It is unclear if any traffic signals planned here.

It is unclear, with the new road traffic calmed how are journey times assessed and how has re distribution to the old A259 been considered.

I think a full design life traffic model created should have been created.

It is unclear what form of traffic calming is proposed in the new highway section as this can cause additional noise and air pollution issues. Such calming is also not conducive to on street parking and safety conflicts.

It is unclear how are cyclists routed in the new arrangement as separate routes are not clear in the highway corridor sections shown.

The accident record on the existing Princes Parade is low but if all the current traffic is now directed through a Residential area, I am doubtful that a low accident record can be maintained.

The new alignment has a number of sharper radii but I am unclear on the design speed, if the existing 40mph were maintained, and presents a further safety concern.

Details are unclear and Sight stopping and Visibility splay spaces need accommodating and formal Design Departures would need to be sought and agreed with KCC.

I note formal Vehicle control barriers (VCB) are to be installed, at the recommendation of the Safety Audit team, so they are clearly concerned regarding speed and the high-level differences to the RMC. In such roads these barriers would be last resort addition and are not to me construed as a mitigation for sub-standard alignment.

~~It is unclear how the new road is to be 'supported' and protected given its proximity to the canal but also ease of access to children, dogs, wildlife etc.~~

These Safety matters appear to be at large at present and represent another concern of mine but note a number are also referenced in the Councils own Road Safety Audit

It is unclear how the Council address the High risk (RED) matters from the Design South East document of 2016 - 'Building for Life' review where the new road is strongly challenged on re aligned route and position

I see these aspects as a further de merit and completely refute the 'no traffic impact' statement made by Buckles. On what basis can this statement be made when so little detail is evident and a stated increase in traffic generation is a certain and stated scenario.

## Conclusion

10) In my professional opinion I see several significant Highway related matters that remain unresolved nor fully challenged particularly against the retention of the existing Highway alignment.

The case for the stopping up and proposed diversion is in my opinions flawed

To this end I urge the Secretary of State to consider the manifold detriments of the newer aligned and consider the harm to outweigh the benefit and so the Order should not be confirmed.

The evidence I have prepared and provided to this Inquiry in this proof of evidence is true and confirm the opinions expressed are my professional opinion

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