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Dear Planning,

**NETWORK RAIL RESPONSE TO CANTERBURY CITY COUNCIL LOCAL PLAN  
(REGULATION 18) CONSULTATION**

Thank you for providing Network Rail Infrastructure Limited (Network Rail) the opportunity to make comment on the Regulation 18 version of the Canterbury City Council (CCC) Local Plan.

It is important that opportunities to promote the use of the railway as a more sustainable modes of transport are identified and taken forward. The railway network is a vital element of the country's economy and a key component in the drive to deliver the Government's sustainable agenda.

Network Rail is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland, and Wales. As statutory undertaker, Network Rail is under license from the Department for Transport (DfT) and Transport Scotland (TS) and regulated by the Office of Rail and Road (ORR) to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway. As a matter of course, proponents of sites which are close to the railway boundary or sites which could affect the railway asset directly are required to engage with our Asset Protection and Optimisation team (ASPRO).

Network Rail has comments which we hope are of use to the Council and are keen to assist where possible to deliver these. We appreciate the engagement the Council has had with Network Rail and wish for this to continue as the Plan progresses.

Network Rail notes the Council's Spatial Strategy which proposes Canterbury, Whitstable and Herne Bay as the three urban areas within the District. The Strategy notes the National Planning Policy Framework (NPPF) approach towards increasing the rate of housebuilding through the standard methodology. It is important that the CCC Local Plan seeks to meet housing need in full and maximises development opportunities within the three urban areas. There appears to be a conflict whereby Whitstable and Herne Bay are considered secondary areas for development when compared with Canterbury within the Local Plan despite the hierarchy suggesting the three urban areas are the core locations for development.

One of the most sustainable locations for housing provision is around transport nodes, such as railway stations, and the Council should give due consideration to these opportunities. Network Rail can support the Council on this should this assistance be sought. Additionally, it is vital that the transport infrastructure required to support the level of growth is fully considered and is identified as a key priority for the Plan to support the local economy and promote sustainable modes of transport.

### **Rail network in Canterbury**

Network Rail welcome the continued growth of Canterbury District, and in particular the urban area of Canterbury. However, it is important to highlight how rail improvements will be required to facilitate this growth in both housing and employment across the planning area.

Canterbury benefits from excellent rail connections with access to High Speed 1 (HS1) available at Canterbury West allowing for access to London in under an hour. Faster services also stop at Herne Bay, Chestfield and Swalecliffe and Whitstable stations. Slower services to London are provided via Chartham, Bekesbourne, Adisham and Canterbury East however journey times remain good and this provides for excellent connectivity.

Given the multitude of connections, the railway provides a significant benefit for Canterbury District, and it should be at the heart of the Council's Local Plan. Encouraging use of the railway is a genuine means of decarbonising the local transport network by promoting mass transit of people which significantly reduces car journeys.

In terms of stations, Canterbury West is a Category A station which means it benefits from a fully accessible footbridge with lifts between platforms. Herne Bay station is currently being upgraded to include two lifts on the footbridge to enhance accessibility. Canterbury East is also a Category A station and is fully accessible.

There are however several stations that could benefit from upgrades to enhance accessibility and accommodate increasing numbers of passengers. Chartham and Sturry stations are classed as Category B1, which means there is a degree of step free access between the platforms however this is achieved by using a level crossing which increases risk to safety of users.

Bekesbourne, and Adisham stations are Category B2 which means there is some step free access but this is limited and would benefit from improvements to significantly enhance accessibility. Chestfield & Swalecliffe is a Category C station which means there is no step free access at the station. Given it serves an area between Whitstable and Herne Bay and benefits from HS1, upgrades to Chestfield & Swalecliffe would be of enormous benefit to its users and enhance the railway significantly.

Network Rail would welcome the opportunity to discuss contributions towards funding the stations where improvements could be made with the Council and developers or other third parties.

### **Canterbury West**

Canterbury West station is of significant local and regional importance within Kent. Its location on HS1 line combined with its accessibility to Canterbury City makes it a significant driver for the local economy and contributes significantly to supporting leisure and tourism. Leisure travel is the fastest growing use of the railway since Covid 19. Given its importance, Canterbury West suffers from significant constraint both in terms of accommodating capacity at the station and having sufficient platforms to support 12 car trains on the HS1 network. As result, overcrowding and accessibility issues remain at the station and need to be resolved as a high priority. Network Rail identify opportunities to resolve these constraints in the Infrastructure Delivery Plan section of this response below.

As noted, Canterbury benefits from a significant number of tourists visiting with around 7 million a year who spend an estimated £45 million. Canterbury is therefore one of the key economy drivers both locally and regionally within Kent. Ensuring more of these visitors travel by train, quickly and easily will open Canterbury and reduce the number of car journeys made thereby having a positive impact on local congestion issues. HS1 provides the speed to access Canterbury via the railway and enhancements to Canterbury West will make journeys easier through reducing congestion and accommodating more passengers.

### **Canterbury vision**

Network Rail supports the vision for Canterbury which seeks to build on the city's role within Kent and diversifying the local economy and offer. The proposal to reduce traffic congestion through a decisive switch towards public transport is also supported. The promotion of public transport, especially rail, should be a key part of the Council's strategy. Reference to high speed rail to Canterbury West should be included to promote the speed with which passengers can travel within Kent and into London.

Network Rail supports the identification of 'Land adjacent to Canterbury West Rail Station' as being a regeneration opportunity area on the Canterbury city centre key diagram.

### **Policy C3: Land north of Canterbury West Station**

Network Rail supports the proposed allocation of this site. An integral part of the allocation is to deliver much needed improvements to the Station, including platform extensions to accommodate 12 car trains. The bringing forward of development on land identified as part of the draft allocation will enable significant improvements to the Station to resolve some of the issues identified by Network Rail. The draft site allocation red line boundary appears to differ from that submitted as part of the Call for Sites last year. The Call for Sites submission included land additional land, not with Network Rail's control but understood to be required to deliver the proposed re-development.

### **Policy C4: Canterbury City Centre Regeneration Opportunity Areas (ROA)**

Network Rail supports this approach and the preparation of detailed development briefs for all the identified ROAs.

### **Policy C6: Land at Merton Park**

Network Rail supports the proposal to provide new and enhanced cycle connections to Canterbury East station as set out in para 4 a (iii) within the draft Policy and improvements to the Station as stated in para b. The development proposed is significant and therefore opportunities to encourage use of the Station and improve accessibility to support its increased usage should be supported. This will support the Canterbury vision to reduce traffic congestion through a decisive switch to public transport.

#### **Policy C7: Land to the North of Hollow Lane**

Network Rail supports the proposal within part 4b of the draft Policy to secure improvements to Canterbury East station.

#### **Policy C9: Milton Manor House**

Network Rail supports the proposal within part 4b of the draft Policy to secure improvements to Canterbury East station.

#### **Policy C12: Land north of the University of Kent**

Network Rail supports the proposal within part 4b of the draft Policy to provide a transport hub to support good access to Canterbury West station. Additionally, Network Rail supports the proposal within part c to provide improvements to Canterbury West station.

#### **Policy C14 – Land at Station Road East**

Network Rail supports the allocation of the land forming this draft Policy. The site has been promoted for development through previous iterations of the Council's Local Plan. In part 1 a of the draft Policy, Network Rail suggests that reference is made to a minimum of 37 dwellings, rather than approximately, to allow for scope for a higher yield. As part of this, Network Rail suggests a change to part 2 a of the draft Policy to refer to remove reference to apartments and to use dwelling houses as the term for all types of housing for the site. This provides flexibility to ensure viable delivery on the site.

As noted with part 4 a of the draft Policy, adequate car parking will need to be retained to support those who wish to drive to the station. The promotion of improved active travel links through walking and cycling in part 4 b is essential to encourage fewer car journeys and better connect the station with its surroundings. At present, the site is more isolated but gives rise to opportunities to better connect the station a part of the re-development.

#### **Policy C15: Land at the Former Chaucer Technology School**

Network Rail notes the proximity of the proposed allocation to the railway line. Part 3 d of the draft policy is supported however it is important that the developer of the site engages with Network Rail to ensure sufficient boundary fencing and treatments are in place to protect the railway and sufficient buffer is provided to allow access to the railway for emergency and planned works when necessary. This should be included within the proposed Policy for the allocation.

#### **Policy C16: Land at Folly Farm**

Network Rail notes the proximity of the proposed allocation to the railway line. Part 3 d of the draft policy is supported however it is important that the developer of the site engages with Network Rail to ensure sufficient boundary fencing and treatments are in place to protect the railway and sufficient buffer is provided to allow access to the railway

for emergency and planned works when necessary. This should be included within the proposed Policy for the allocation.

### **Policy C18: Land on the eastern side of Shelford Landfill**

Network Rail notes the proximity of the proposed allocation to the railway line. Part 3 g of the draft policy is supported however it is important that the developer of the site engages with Network Rail to ensure sufficient boundary fencing and treatments are in place to protect the railway and sufficient buffer is provided to allow access to the railway for emergency and planned works when necessary. This should be included within the proposed Policy for the allocation.

### **Policy C19: Wincheap commercial area**

Network Rail supports the proposal to provide a masterplan for the re-development of the site.

Network Rail supports the proposal within part 4a (ii) of the draft Policy to secure new and improved walking and cycling connections to Canterbury East station. Given the site's proximity to the rail station, and the opportunities to encourage use of the railway, opportunities to secure improvements to the station should be pursued. As such, an additional paragraph should be included within the Policy to secure improvements to Canterbury East station.

### **Whitstable**

Whitstable station is classed as Category B2 meaning there is some step free access at the station, but improvements could be made. There is a stepped footbridge allowing for access between the two platforms. The provision of a fully accessible footbridge would make accessing either platform easier and would help support the growth of Whitstable and its town centre. The railway station should be viewed as a key feature in enhancing the local economy and being the focus around which growth can be secured.

### **Policy W1: Whitstable Town Centre Strategy**

Reference should be made within the draft Policy to the rail station at Whitstable and the opportunities to promote use of the railway.

### **Policy W3: Whitstable urban area**

Part 3 of the draft Policy is supported to provide improved links to the railway as part of enhancing first and last mile provision.

### **Policy W6: Bodkin Farm**

Network Rail supports part 4a (ii) to provide new and improved connections to Chestfield and Swalecliffe station. Opportunities to pursue improvements to the railway station should be sought within the draft Policy.

### **Herne Bay**

Herne Bay station is currently under-going significant improvements to enhance the passenger experience and ensure it accommodates increased use. Network Rail would encourage the Council to support opportunities to maximise improvements to Herne Bay

station by encouraging development to locate nearby alongside improved access to the station. As noted in the Economic Development and Tourism Study (2020), *'as more traditional seaside town, Herne Bay would benefit from investment in its tourism product'*. Given Herne Bay benefits from high speed rail services, the potential to further develop the local economy is significant given the increasing use of the railway for leisure travel.

### **Policy HB3: Herne Bay urban area**

Network Rail supports Part 2 of the Policy to improve links to the railway station.

### **Policy HB4: Land to the west of Thornden Wood Road**

Network Rail supports part 4a (ii) and improving links to the two stations.

### **Policy HB5 – Land comprising Nursery Industrial Units and former Kent Ambulance Station**

Network Rail notes the proximity of the proposed allocation to the railway line. Part 3 c of the draft policy is supported however it is important that the developer of the site engages with Network Rail to ensure sufficient boundary fencing and treatments are in place to protect the railway and sufficient buffer is provided to allow access to the railway for emergency and planned works when necessary. This should be included within the proposed Policy for the allocation.

### **Policy HB8: Altira**

Network Rail notes the proximity of the proposed allocation to the railway line. Part 2 g of the draft policy is supported however it is important that the developer of the site engages with Network Rail to ensure sufficient boundary fencing and treatments are in place to protect the railway and sufficient buffer is provided to allow access to the railway for emergency and planned works when necessary. This should be included within the proposed Policy for the allocation.

Part 4a (iii) of the draft Policy is supported in improving links to Herne Bay station.

### **Land at Herne Bay Station**

The above is an allocated site within the 2017 Local Plan for 35 dwellings located on land adjacent to Herne Bay station, under Policy HD1. Access to the site is achievable towards the west and, given its proximity to the railway station, presents a significant opportunity to promote a 'car lite' development. The site has been in operation over the last few years by Network Rail's contractors to facilitate the delivery of the Access for All improvements at Herne Bay station. With that work now coming to an end the site is no longer needed for operational requirements and allows for the site to be re-developed. Network Rail support the site remaining as an allocation within the new Local Plan for a minimum of 35 dwellings, with a realistic delivery timeframe of 1-5 years.

### **Policy R7: The Hill, Littlebourne**

The proposed allocated site is located within relatively close proximity to Bekesbourne railway station and as such is within a reasonable walking and cycling distance. In part 4a (iii) reference should be made to providing new and improved connections to Bekesbourne railway station. It is likely that cycling would be the most appropriate means of travelling to the station therefore reference should be made to providing improvements to Bekesbourne railway station within the draft Policy.

## **Sturry**

### **CF1: Land at Sturry/Broad Oak**

The site is an allocation within the 2017 Local Plan and has outline planning permission. The development provides the opportunity to close level crossings along the railway, which would remove a significant safety risk to the public. Additionally, there exists the opportunity to extend the platforms at Sturry to accommodate 12 car trains and increase the effectiveness of trains stopping at the station. These issues should be considered holistically alongside the bringing forward of the Sturry link road and the development of the site.

### **Policy DS7: Infrastructure delivery**

Network Rail supports the draft Policy and its intent on securing infrastructure as required by development. As a key provider of infrastructure, Network Rail supports an approach which secures either the provision of, or funding towards, the required infrastructure as early in the planning and delivery process as possible. It is often most suited to time the phasing of housing delivery to ensure the requisite infrastructure is secured and/or in place, alongside the appropriate funding. To enable the effective phasing, Network Rail supports the use of Grampian planning conditions. Inclusion of the use of Grampian planning conditions to secure infrastructure should be included within the draft Policy. This is essential to ensure that the required infrastructure is secured and delivered.

Network Rail supports the implementation of a viability review mechanism to ensure that development which can contribute towards infrastructure does so, especially when it is initially set out that such costs cannot be covered but latterly the opportunity to provide the necessary funding becomes available.

### **Policy DS10: Town centres and community facilities**

Network Rail notes the proposed hierarchy of centres and the identification of Herne Bay and Whitstable as district centres. Given access to the rail network, opportunities to maximise development opportunities within these centres should be pursued due to the sustainable nature of them. Where possible, development close to rail stations should be encouraged and supported to maximise opportunities to encourage people to utilise the railway.

### **Policy DS11: Tourism development**

Network Rail supports part 1a of the draft Policy in its requirement for development to be accessible by public transport. Leisure travel growth is significant on the railway and opportunities to maximise this should be sought.

### **Policy DS13: Movement hierarchy**

Network Rail notes the hierarchy as proposed in the draft Policy. The identification of public transport within this is supported and, to encourage the effective implementation of this hierarchy, the railway should be actively promoted throughout the Local Plan.

### **Policy DS14: Active and sustainable travel**

Opportunities should be sought to enhance first and last mile principles within new and existing development. This focuses on the promotion of providing uninterrupted access via walking and/or cycling from development to the nearest railway station. Reference to first and last mile should be incorporated within the draft Policy.

#### **Policy DM14: Flood Risk**

Protecting rail infrastructure from increased surface water flooding is vital to ensure the safe and efficient running of the railway. Where new development is close to the railway, or within a flood risk zones 2 and 3, recognition should be given to ensuring there are no adverse impacts on the railway. Flood Risk Assessments should consider this and provide detailed mitigation where required. The applicant should be responsible for fully funding any mitigation required to ensure no adverse impacts on the railway as a result of the development. Reference to the above should be included within the draft Policy. This should also be in conjunction with Policy DM15.

#### **Policy DM15: Sustainable drainage**

Cross reference with comments provided on Policy DM14 to ensure a holistic approach to maintaining rail infrastructure. Part L of the draft Policy is supported however this needs to go further to minimise impacts.

#### Level crossings

There are a number of level crossings within the District, and there are a number in close proximity to stations at Chartham, Sturry and Canterbury West. Level crossings create a significant risk to public safety, and many experience incidents of misuses. Network Rail has a duty to ensure that this risk is managed appropriately and reduced, or remove entirely, where possible. Where development interacts with level crossings, appropriate mitigation should be sought to ensure there is no increased risk to safety arising from the new development.

Should the Council pursue development opportunities that increases the interaction of members of the public with level crossing on the rail network, then closure or mitigation of such crossings should be an essential consideration within the new Plan. This would not block development but would need to be identified as a vital safety feature when developing site allocations or taking a decision on planning applications. Network Rail suggest that this would take the form of inclusion of a specific Policy focused on level crossing safety and mitigations as required arising from development or inclusion of this within a relevant Policy, within the Plan. No new rail crossings should be promoted without consultation with Network Rail to ensure this does not bring additional safety risks.

It is noted that where a level crossing supports a Public Right of Way, this would be the responsibility of Kent County Council however it would be beneficial to have a supporting policy for this within the CCC Local Plan.

As the experts in rail safety, Network Rail would be able to support the Council in developing an effective approach which ensures the safety of residents and other users without compromising the safe and efficient running of the railway.

#### **Rail improvements**



In addition to the above, the draft Canterbury District Transport Strategy (CDTS) has been reviewed and the indicated rail improvements remain supported. It should, be noted that platform extensions are proposed at Sturry as opposed to only widening, therefore this change should be made to provide clarity. Additionally, the Plan provides the opportunity for improving step free access between the platforms however it is noted that there is limited development now proposed within Adisham. Reference to improving step free access at Adisham however should be included within the CDTS as it remains an opportunity, subject to the availability of funding.

### **Summary**

The rail network within Canterbury provides an excellent basis to pursue development opportunities and to promote sustainable transport as a genuine alternative to using the car. Additionally, Network Rail supports the identification of public transport as a key priority/opportunity within the new Local Plan. The Plan should continue to be developed, with appropriate policies and site allocations which promote the rail network in encouraging its usage and pursuing development opportunities.

Network Rail are keen to continue to work with the Council and other stakeholders in helping to deliver transport and infrastructure improvements for the benefit of residents of Canterbury District.

I trust the above is of use and if there any issues raised that needs further discussion then please do not hesitate to contact me.

Kind regards,

**Craig Hatton MRTPI**  
**Senior Town Planner**