

Project Name : Canterbury District Draft Local Plan to 2040

Job No : 24-125

Note Title : Transport Technical Note

Author : AM

Checked : AM

Approved : SRB

Date : June 2024

1.0 PREFACE

1.1.1 Odyssey provides consultancy services for development, including transport planning, infrastructure planning, flood risk and river modelling, civil engineering, and highways design. Odyssey's transport planning team has been operational since the founding of the business in 2005 and has significant experience advising on large scale residential developments across London and the South of England.

2.0 INTRODUCTION

2.1 Objectives

2.1.1 This Transport Technical Note (TN) has been produced by Odyssey on behalf of Save the Blean Action Group (the 'Client'). The purpose of this TN is to provide Highways and Transport advice to support representations by the Client to the Draft Canterbury District Local Plan 2040, and specifically in relation to land north of the University of Kent, known as site C12.

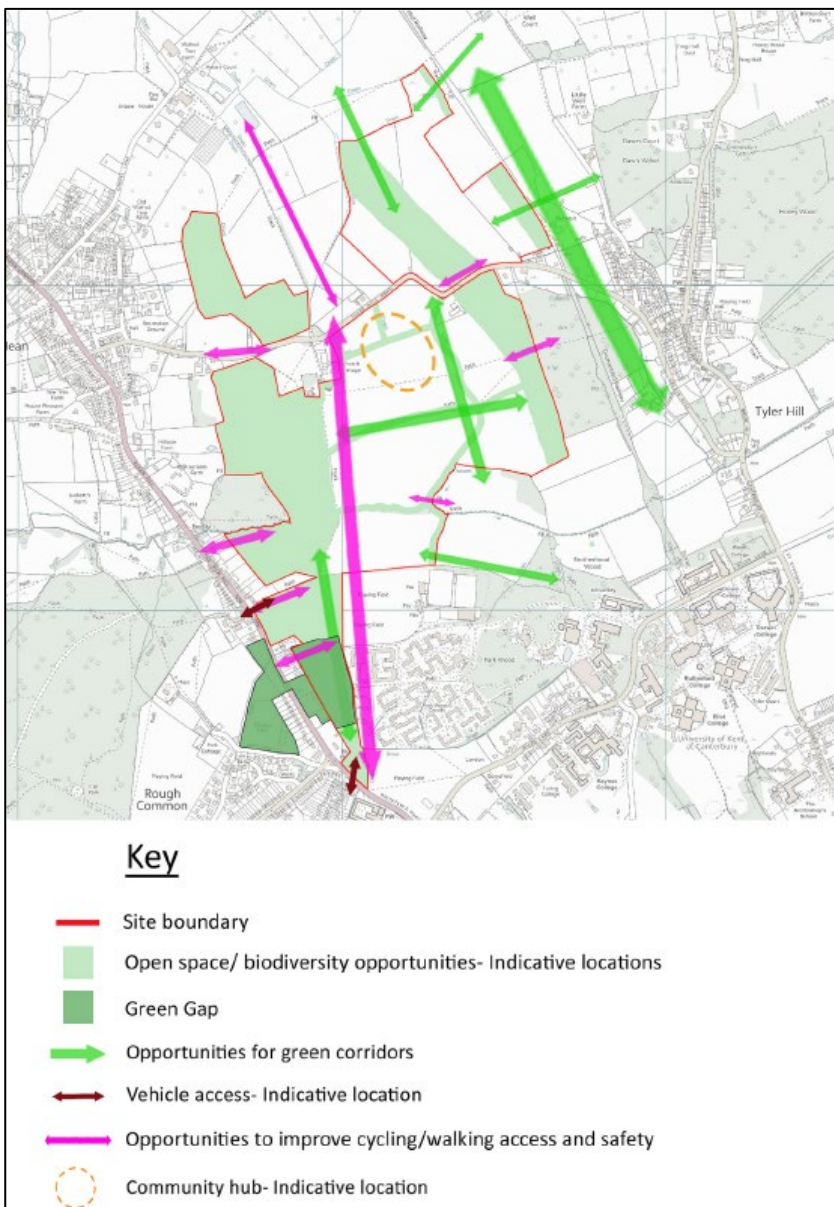
2.1.2 This TN aims to evaluate the appropriateness of development proposals on the site, as detailed in the draft Local Plan under policy C12, against National, Canterbury and Kent policy requirements as they relate to matters of Highways and Transport.



2.2 Site Context

2.2.1 The location of the site, as referenced within the Draft Canterbury District Local Plan 2040 as C12, is shown in **Figure 2-1**. The site is located approximately 3km to the north of Canterbury City Centre and lies to the north of the University of Kent Canterbury Campus. The site is currently open greenfield land. Broadly, the main highways connections to the site are via Fleets Lane to the north east of the site, Hackington Road/ Canterbury Hill to the east, and the A290 Whitstable Road to the west of the site. Tyler Hill Road runs through the middle of site C12 in a broadly east/ west orientation.

Figure 2-1: Policy C12 – Land north of the University of Kent – Concept Masterplan
(Extracted from Draft Canterbury District Local Plan 2040)





2.3 Draft Site Allocation

2.3.1 Site C12, as referenced within the Draft Canterbury District Local Plan 2040, is allocated for a comprehensive mixed-use development. In transport terms, under 'Access and Transportation' the Local Plan states that Site C12 should meet the following criteria:

"The access and transport strategy for the site should:

- a) Provide safe and convenient pedestrian and cycle connectivity including:
 - i. Improved walking and cycle connections to the city centre via the Crab and Winkle cycle route and PRowS through the UoK estate;*
 - ii. Improved cycle connections to Whitstable via Crab and Winkle cycle route;*
 - iii. New and improved walking and cycling connections to Blean, Tyler Hill, Broad Oak and the wider countryside to the east; and*
 - iv. Improvements to PRowS within and around the site as required.**
- b) Provide a Transport Hub within the site to facilitate good access to public transport facilities for new residents, with a new bus route connecting residential areas and the community hub to Canterbury West railway station and the city centre;*
- c) Provide improvements to Canterbury West Station to include facilities for cycle parking and passenger flows;*
- d) Provide a primary access point to the site at the junction of Whitstable Road and Rough Common Road and secondary access to the site from Whitstable Road through land at Blean Primary School;*
- e) Minimise traffic flow onto Tyler Hill Road in both directions;*
- f) Provide an all-movement junction at A2 Harbledown through the provision of additional slip roads;*
- g) Provide highways improvements to Rough Common Road; and*
- h) Provide a Transport Assessment to demonstrate the connectivity of the site with the existing highway network, any necessary mitigation and measures to minimise the need for use of private cars."*



3.0 POLICY AND EVIDENCE REVIEW

3.1 Summary

3.1.1 In order to inform Odyssey's assessment, a number of draft Canterbury Planning policies and topic papers have been reviewed. This section of the report provides an overview of the relevant information found in each of the reviewed documents, with analysis provided within the following sections of this report.

3.1.2 The following policy and evidence documents have been reviewed:

- Draft Canterbury Local Plan
- Draft Canterbury District Transport Strategy
- Draft Infrastructure Delivery Plan
- Transport Topic Paper

3.2 Draft Canterbury Local Plan (DCLP)

3.2.1 The draft Local Plan sets the blueprint for the delivery of future growth and infrastructure along with a framework for protecting and enhancing the environment across the district. The Local Plan is the main piece of planning policy produced by the Council. The local plan sets out a positive vision for managing growth in the area until 2040 and sets out targets for the volume and form of development required in the area through the plan period.

3.2.2 Policy SS3 proposes the development of 1,149 new dwellings per year within the local plan period until 2040, with Canterbury urban area being the principal focus of new development in the area. Canterbury has been chosen as the focus for development, as "*focusing growth at the urban areas and Canterbury... presents the greatest opportunities to plan for a switch to sustainable transport*" (pg. 18).

3.2.3 Policy SS4 sets out the movement and transport strategy for the district, which aims to deliver a comprehensive programme of sustainable transport infrastructure measures to accommodate growth and to facilitate a significant shift to low-carbon and active travel journeys.

3.3 Draft Canterbury District Transport Strategy

3.3.1 The draft Transport Strategy has been produced to support the local plan and encourage sustainable travel within the area over private car use, ensure that every person has access to sustainable transport modes, and ensure that "*the district is able to absorb all the additional trips associated with the planned development* (pg.3).



3.3.2 Mode share and modal shift targets are outlined on page 5 of the document which are shown in **Table 3-1** below. The table shows that across all modes, including pedestrians, cyclists and public transport users, there was a decrease in travel mode share in 2021 compared to the surveyed 2011 travel mode share. This was due to an increase in working from home.

3.3.3 As the 2021 Census was conducted during the Covid-19 pandemic, surveyed travel behaviours were likely to have been substantially impacted. In particular the ‘work from home’ mode share in 2021 was substantial, therefore analysis has been undertaken to reduce the ‘work from home’ mode share in 2021 to align with that forecast in 2031 and disaggregate the remainder across all other modes proportionally. The updated 2021 mode share shows that reducing work from home increases larger modes such as driving and walking substantially. Comparing the 2031 mode share targets to the adjusted 2021 mode share shows that the mode shift targets equate to a 5% increase in pedestrians and a 7% increase in public transport users along with an ambitious 15% decrease in car mode share.

Table 3-1: DCLP Mode Share Targets

Mode	2011 Mode Share	2021 Mode Share	2021 Adjusted Mode Share (WfH at 2031 level)	2031 Mode Share	% Change (Adjusted 2021 – 2031)
Driving a car or van	55%	46%	57%	42%	-15%
On foot	14.7%	11%	13%	18%	5%
Bicycle	2.7%	2%	2%	4%	2%
Bus, minibus or coach	4.9%	3%	4%	7%	3%
Train	5%	2%	3%	7%	4%
Working from home	11.6%	30%	14%	14%	0%
Passenger in a car or van	4.7%	4%	5%	7%	2%
Other	1.5%	2%	2%	2%	0%
Total	100%	100%	100%	100%	0%

3.4 Draft Infrastructure Delivery Plan (DIDP)

3.4.1 The draft Infrastructure Delivery plan has been produced as a supporting document to the draft Canterbury Local Plan to “*identify the key infrastructure requirements to support growth*” (para 1.1) during the plan period. This document aims to detail the infrastructure improvements required to support the planned development, contained within site allocations. The document notes in paragraph 1.2 that whilst this plan identifies infrastructure requirements, that “*further work is required on phasing and delivery.*”



Funding/ Contributions

3.4.2 Section 8 of the report DIDP sets out the Council's approach to developer contributions, which is in line with national guidance, stating that *"all development should mitigate itself/ provide proportionate contributions toward strategic mitigation measures"* (para 8.1), stating that new infrastructure required for allocated sites should be funded using Section 106 agreements rather than CIL income.

3.4.3 Large infrastructure proposals have been costed and evaluated based on studies published in 2022 and costed in 2021 (DIDP, 2022, Table 8.1). Infrastructure schemes are proposed to be funded using a combination of S106 contributions and CIL, which is also applied to public transport improvements, whilst active travel works are proposed to be CIL funded.

Sustainable Transport and Highways

3.4.4 Section 10 of the DIDP deals with sustainable transport and highways proposals and infrastructure proposals. Paragraph 10.1 of the DIDP summarises a study undertaken by Jacobs in 2019 that fed into the draft Local Plan which stated that traffic flows through the district were *"generally lower than when traffic counts were undertaken in 2009... but despite this reduction in overall traffic flow, journey times are unstable and incidents create severe congestion"* (para 1.2). The study continues to state that without additional transport interventions, congestion on the ring road will continue and result in worsening air quality and quality of life. In response, the plan proposed a new movement corridor to the east of the city, to bypass the city centre and create a ring road with the existing A2. We understand that these proposals are no longer being pursued in the latest draft local plan and that the Council has now adopted a bus led strategy.

3.4.5 We understand Kent County Council Highways previously noted that the earlier proposed infrastructure, as well as additional walking and cycling connections, would be *"essential"* to the delivery of C12 (DIDP, para. 10.8), with park and ride connections and improved bus infrastructure and connectivity also required.

3.5 Transport Topic Paper

3.5.1 A Transport Topic Paper was prepared which formed part of the evidence base for the draft Local Plan and specifically analysed transport related issues, opportunities and proposals in the district. The paper set out the Council's key transport objectives as being to:

- Reduce the volume of vehicle movements.
- Increase active travel mode share.
- 'Rapidly' electrify road vehicles.



3.5.2 The paper tested five options using transport modelling which, amongst other issues, tested the impact of the circulation plan on traffic flows and air quality. We understand these five options are no longer being pursued. However, the SWECO option 3 closely replicates what is now being proposed in the latest version of the DCLP.

3.5.3 For information, the previous optioneering concluded that the modelling exercise highlighted an *“issue to the north of the city with considerable congestion around junctions at Hackington Road to the north of the University... and significant increases in traffic flow on Whitstable Road and Tyler Hill Road. For this reason, development at the University is not currently being pursued within this Local Plan”*.



4.0 ASSESSMENT OF POLICY AND EVIDENCE

4.1 Summary

4.1.1 For the reasons set out within this TN the allocation of the land referred to in the draft Local Plan as site C12 for c.2,000 dwellings is considered inappropriate based on a review of the local and national planning policy, the local context of the site and potential impact that this scale of development at the site could have in transport terms.

4.1.2 A review of the draft Local Plan, draft Transport Strategy, draft Infrastructure Delivery Plan and Transport Topic paper has been undertaken to evaluate the proposed allocation of the site against Canterbury/ Kent Council policy documents.

4.1.3 The policy review has formed the basis for the analysis contained within the remainder of this report, with the key findings summarised below:

- The lack of site specific modelling provided as part of the evidence base.
- The proposed location of vehicle access to the site all being concentrated to the south west corner of the site and its impact.
- The impact of the proposed development on the surrounding road network including on Tyler Hill Road.
- The proposed modal shift targets set out in the Council's strategy likely to be insufficient to absorb the likely trip generation impact of the proposed development.
- Delivery of the proposed off site strategic network improvements likely to be incompatible with the development roll out.

4.2 Odyssey's Findings

4.2.1 A consultation at Reg 18 would generally be provided with district-wide transport modelling including site-specific transport modelling for large, proposed development sites. A thorough review of the evidence base and the draft Local Plan has been undertaken, but no specific assessment has been found to quantify the impact of the proposed development at site C12 in detail. Whilst it is appreciated that the development is only at the Regulation 18 consultation stage of the draft Local Plan process, given the scale of the development proposed, it is hard to justify the apparent lack of information provided.

4.2.2 For context, we have been unable to find modelling in any of the evidence base that specifically quantifies the impact of this development in the context of the most recent bus and Active Travel led transport strategy. Without this, it is difficult to see how the consultation exercise



undertaken by the Council could be considered meaningful, as residents, consultees, stakeholders and Councillors are not able to establish the impact of the proposals, even at a preliminary stage.

4.2.3 Furthermore, it is not possible for residents, consultees, stakeholders and Councillors to establish if the proposals if, in their opinion, the proposals would have an “*unacceptable impact on highway safety, or [if] the residual cumulative impacts on the road network would be severe*” (NPPF, 2023, pg. 33, para. 115) as outlined within the National Planning Policy Framework (NPPF). We would therefore request that no decisions are taken to further promote site C12 until and unless site-specific information is provided, to demonstrate that the impacts of the development could be realistically mitigated, and the overall impacts would not be severe.

4.3 Local Impact

4.3.1 The site allocation requirements as set out in the draft Local Plan states in point ‘d’ (para 2.3.1 above) that the primary access point for the site should be situated at the junction of Whitstable Road and Rough Common Road, with a secondary access provided from Whitstable Road through land at Blean Primary School.

4.3.2 The location of **both** access points to the southwestern corner of the site, from Whitstable Road is questioned, as all traffic flows generated by the development would be concentrated on Whitstable Road. Development traffic accessing the site from or having local destinations to the north and the eastern side of Canterbury would therefore need to detour to access the site from the west. Aside from focusing the impact of all the development traffic onto Whitstable Road, and impeding access to future residents travelling to/from the northern and eastern parts of the city, providing access on one side of the development goes against best practices of making developments permeable from all directions. Furthermore, this strategy would leave large parts of the C12 site remote from a vehicular connection with the existing highway network. This is likely to lead to an unacceptable increase in traffic flows along Whitstable Road and would add pressure to the use of Tyler Hill Road, contrary to point ‘e’ (“*Minimise traffic flow onto Tyler Hill Road in both directions*”) of the Council’s list of requirements for the allocation of this site. This approach also begs the question as to whether a suitable vehicular access connection could be achieved to the east of the site onto Fleets Lane, which is a narrow lane not considered suitable for large scale development traffic.

4.3.3 The site allocation also states that the proposed access across land associated with Blean Primary School cannot be developed on until the new school is provided at the point where 25% of new houses are occupied, possibly leaving the site reliant on a single vehicle access for a number of years. Again, the impact of all development vehicle traffic concentrated through one access has not been assessed or modelled in any publicly available document.



4.3.4 Given the high-level way that the junctions have been marked on plan in the draft Local Plan, it is impossible to assess the design of the junctions within the context of the surrounding highways network. As stated in **Section 3.2** of this report, additional information would be required to fully assess the proposals.

4.3.5 The site allocation states that the development should minimise traffic flows onto Tyler Hill Road in both directions. Given that Tyler Hill Road runs through the site, and that no access is provided directly into the site from the east, it is difficult to see how this could be achieved and significant increases in two way traffic flows along Tyler Hill Road could be avoided. Tyler Hill Road at its eastern side is a narrow country lane which measures c.4m in width, and therefore would not be capable of accommodating any significant volume of traffic. Canterbury City Council and Kent County Council should demonstrate their strategy for preventing additional traffic from using this narrow road. The ability of such a strategy to succeed is questioned, when Tyler Hill Road runs through the proposed site and provides one of the only east/ west links in the area.

4.3.6 Given the queries raised both within **Section 3** of this report, additional site specific information regarding the impact of the site on the surrounding road network, highways safety and access proposals must be provided and properly considered by stakeholders and consultees so that the impacts can be assessed fully against paragraph 115 of the NPPF.

4.4 Strategic Impact

4.4.1 The Council's draft Infrastructure Delivery Plan states that infrastructure is key to supporting growth in the area, and that all developments should mitigate their own impact and contribute toward strategic measures. Significant infrastructure is proposed to enable the proposed development at site C12 and mitigate the negative impacts of the proposals – with National Highways noting that improvements to the A2 Junction (to provide full east and west facing slips at the Harbeldown interchange) are 'essential' to facilitating development at the site (noted in the draft Infrastructure Delivery Plan).

4.4.2 The draft Infrastructure Delivery Plan further notes that allocated sites should fund their required infrastructure using S106 funding rather than CIL funding. The requirement to negotiate S106 contributions with the developer of the site and adjacent sites may raise a significant risk to the viability of developing the site both financially but also in terms of programme. If S106 negotiations are required to secure essential infrastructure that is necessary at the initial stages of the development, before any units have been built or sold, there is a risk that developers may not be able to accommodate the required risk so early in the development process. Similarly, the negotiation of essential infrastructure not only risks delaying the delivery of the infrastructure, but also may lead to the diluting of proposals if the full sum is not able to be achieved through said negotiations.



4.4.3 The infrastructure required to enable development on the site, does not appear to have been designed to any detail, with a significant design and review period required for the scale of works proposed at the A2 Harbledown junction, and associated land safeguarding, possible compulsory purchase and planning works all proposed to be undertaken following the allocation of the site. Additionally, the proposed infrastructure schemes were last costed as part of the draft Infrastructure Delivery Plan which was published in 2022. Given the rate of inflation since 2021, costs are likely to have risen since the last costing exercise, even if the full scheme cost is secured by S106 agreement this amount would likely not be sufficient to deliver the scheme to completion.

4.4.4 If, as is being suggested the C12 site could not be developed without the A2 slip road improvements, it is essential that evidence is put forward at this stage of the local plan process to demonstrate how these improvements are to be achieved. In addition, it would be essential that any modelling undertaken of the improved highway network should consider not only the traffic generated by the C12 development, but also as a result of new traffic routing through the Whitstable Road corridor to access the improved A2 interchange. No detailed evidence to demonstrate this effect appears to have been available to stakeholders during this consultation period.

4.5 Modelling Review

4.5.1 Canterbury City Council commissioned Jacobs to undertake modelling as part of their Local Plan evidence base in 2021, with five scenarios modelled. Although five scenarios were modelled in 2021, none accurately reflect the latest bus led proposals now made as part of the draft Local Plan. In order to undertake meaningful consultation a new scenario should be modelled with results published before adoption of the local plan. Option 3 however represents the closest modelled scenario to current proposals and has therefore been reviewed for this report.

4.5.2 The Jacobs report notes (Kent Countywide Model, Jacobs, May 2021) that Option 3 would result in *“very high congestion and queueing on the ring road due to very high traffic leading to the City Centre... all ring road junctions experience very high delays and bad traffic conditions”* (Jacobs, 2021, pg.6). In traffic terms, the impact of Option 3 has therefore been demonstrated to result in a significant detrimental impact on traffic flows on the roads leading to the City Centre and on to the ring road. This will not only have a negative impact on private cars, but this congestion will also negatively impact buses, cyclists and could negatively impact the air quality in the area.

4.5.3 Interventions such as an expansion of the park and ride (P&R) bus services in the city would have a reduced impact with the modelling report stating, *“new P&R locations around the city centre [ability to] help to reduce traffic issues is limited due to very high existing traffic volumes”* (pg.6). Equally the impact of the proposed infrastructure on the A2 (referred to in the Jacobs report as the Thannington 4th slip), is also noted to have a reduced impact compared to its scale, due to the existing congestion, with the report stating that the infrastructure would have a local impact only.



4.5.4 Importantly, the modelling of Option 3 also demonstrates that it would result in “*increased traffic [flows] on lower class rural roads*” and cause traffic to use rat runs (pg.100). Considering the rural nature of many roads surrounding the proposed site C12, including Tyler Hill Road, the conclusions of the Jacobs modelling exercise present concerning conclusions surrounding highways safety.

4.6 Mode Shift toward Active and Public Transport Modes

4.6.1 A key policy of the draft Local Plan, is the mode shift push toward active and sustainable transport modes, as outlined in policy SS4 of the draft Local Plan and detailed within the draft Transport Strategy.

4.6.2 The wording of the sustainable travel goal as set out in the draft Transport Strategy is twofold, aiming to “*ensure that every person has access to sustainable transport modes and ensure that the district is able to absorb all additional trips associated with the proposed development without increasing congestion.*” (draft Canterbury Transport Strategy, pg.3). However, the modelling undertaken by Jacobs and analysed within the previous section of the report demonstrates that proposed development would have a significant impact on congestion both within the city centre, but also on surrounding rural roads.

4.6.3 Mode shift toward active and sustainable transport is encouraged by National Planning policy and National Agencies such as Active Travel England. However, research shows that the shift toward active and sustainable modes requires both infrastructure provision and if the infrastructure is provided, time to allow for behaviour change. Research undertaken in regional UK cities (Southampton, Cardiff and Kenilworth), shows that although “*provision of dedicated cycle infrastructure is critical for achieving higher levels of cycling*”¹ (NIH, 2016), “*behaviours change may take more than a year or two, [especially] once people are habituated to using private motor vehicles*” (ibid).

4.6.4 Mode shift targets as set out in the draft Transport Strategy detail the mode shares surveyed in Canterbury in 2011 and 2021 as part of the Census, as well as 2031 mode shift targets (see **Table 3-1** above). It appears that the 2031 targets are based upon mode shares surveyed in 2021, however as the 2021 Census was undertaken during the Covid-19 pandemic, they are expected to demonstrate substantially different travel behaviours to those experienced post pandemic, for example the ‘working mainly from home’ mode shows mode share of 30.4% in 2021. Section 3.3 of this report provides an adjusted mode share table to reduce the impact of the pandemic on mode share and establish the true mode share targets.

4.6.5 Additionally, active and public transport modes were shown to have reduced between 2011 and 2021, with pedestrian, cycle, bus and train mode shares reducing over the period of the previous



transport strategy. As such, whilst the push toward active and sustainable modes is admirable and encouraged, the realism of the targets proposed in the draft transport strategy are questioned given the lack of detailed information and plans regarding interventions or infrastructure proposed to facilitate modal shift.

4.6.6 Additionally, the local topography of the city should be considered, specifically with regard to the proposed allocation of site C12, which lies uphill from the city centre and would require significant effort for cyclists to navigate, especially on a congested road such as Whitstable Road.

¹ Song, Y, Preston J and Ogilvie, D, 'New Walking and Cycling Infrastructure and Modal Shift in the UK', *PubMed Central Journal*, 2016.

4.7 Trip Generation Impact Assessment

4.7.1 In order to gain some perspective of the impact of the quantum of development being proposed at site C12, a high-level trip generation assessment has been undertaken to quantify the impact of the Council's projected modal shift on development traffic associated with the proposed site allocation. Population information obtained from the local Parish Councils has been used to estimate the number of households in the surrounding area, whilst high level trip rates have been used to estimate trip generation.

4.7.2 The high-level trip generation exercise has been undertaken and is provided in **Tables 4-1 to 4-4**. In order to undertake the assessment, the following assumptions have been made;

- Households have been presumed to each contain on average 2.4 people;
- An assumption has been made that each household would generate 1.0 trips/ unit in the AM peak hour; and
- The mode shift targets provided within the transport strategy have been used to split the trips by mode.

Table 4-1: High Level Trip Generation Assessment (Existing Population)

Area	Existing Population	Number of Households	AM Peak Hour Trips
Blean	1,500	1,829 households	1,829 trips in the AM peak hour
Hackington and Tyler Hill	590		
Rough Common/ Hambledown	2,300		
Total	4,390		



4.7.3 The AM peak hour trip generation has been broken down using the mode shift targets provided within the transport strategy in **Table 4-2** below.

Table 4-2: AM Peak Hour Trips (Split by Mode) (Existing Population)

Mode	2031 Mode Shift Target	Trips
Driving a Car or Van	42%	766
On Foot	18%	330
Bicycle	4%	74
Bus, Minibus or Coach	6.5%	118
Train	6.5%	118
Working from Home	14%	256
Passenger in a car or Van	6.5%	118
Other	2.2%	40
Total	100%	1,829

4.7.4 Trip generation for the proposed development at site C12 is provided within **Table 4-3** below.

Table 4-3: High Level Trip Generation Assessment (Proposed Population)

Area	Number of Households	AM Peak Hour Trips
C12	2,000 households	2,000 trips in the AM peak hour

4.7.5 **Table 4-4** below shows the proposed trips split by mode.

Table 4-4: AM Peak Hour Trips (Split by Mode) (Proposed Population)

Mode	2031 Mode Shift Target	Trips
Driving a Car or Van	42%	840
On Foot	18%	360
Bicycle	4%	80
Bus, Minibus or Coach	6.5%	130
Train	6.5%	130
Working from Home	14%	280
Passenger in a car or Van	6.5%	130
Other	2.2%	44
Total	100%	2,000

*Numbers may not sum due to rounding



4.7.6 As shown in **Table 4-4**, even with the Council's proposed mode share targets being met, the C12 development would likely produce an additional 840 vehicle trips within the AM peak hour. This amount of traffic would be far in excess of the reduction achieved by a 15% modal shift to sustainable modes as forecast to be achieved by the Council's strategy. Considering the noted congestion on Canterbury's Roads and the fact that the development will likely operate with a single access point for some time (see paragraph 4.2.3) the impact of these additional trips would be substantial.

4.7.7 The draft Transport Strategy notes one of the strategy's goals is to ensure that the district is able to absorb all additional trips generated by proposed development. This high-level assessment demonstrates that the proposed development at this site would generate a substantial volume of residual vehicular trips which would be concentrated into/ out of the site through one access, and would then be fed into an already congested road network.

4.7.8 The Save the Blean group undertook a freedom of information request regarding meetings between Canterbury Council and the University of Kent and received all available minutes from these meetings (**APPENDIX A**). In one such meeting, the council notes that there is congestion on Whitstable Road and that the inner ring road is overloaded, officers pose the question internally to consider *"whether inclusion of the University site [as part of the site allocations in the draft Local Plan] would require further mitigation over and above that identified in the current iteration of the Transport Strategy. The obvious way of answering this question is to include the University site within a further model run and this would be necessary in any event before any regulation 19 plan is prepared for consultation and then submitted for Examination"*.

4.7.9 The conclusions drawn by CCC in the above meeting with the University of Kent is completely in line with the arguments made within this report. Namely that additional analysis, including modelling, must be undertaken to quantify the impact of the proposed site allocation and quantify whether the required mitigation would be realistically achievable. Additionally, given the strength of local interest, and in order to provide meaningful consultation this additional analysis needs to be provided to and fully considered by residents, consultees, stakeholders and Councillors as part of the local plan process.

5.0 CONCLUSION

5.1.1 This Technical Note has been produced by Odyssey on behalf of Save the Blean Action group (the 'Client'), to support representations by the client to the Draft Canterbury District Local Plan 2040, with specific focus on the proposed allocation of the land to the north of the University of Kent, known as site C12.



5.1.2 This note has evaluated the appropriateness of development proposals at site C12 against National, Canterbury and Kent policy requirements as they relate to matters of Highways and Transport. This note considers that the proposed development would have a detrimental impact on the surrounding highways network beyond the level currently mitigated against. Furthermore, insufficient evidence has been provided to stakeholders and consultees to enable them to fully assess the proposals and establish if they would have an *“unacceptable impact on highway safety, or [if] the residual cumulative impacts on the road network would be severe”* (NPPF, 2023, pg. 33, para. 115) as outlined within the National Planning Policy Framework (NPPF).

5.1.3 It is therefore requested that no decisions are taken to further promote or progress the allocation of site C12 until and unless additional site-specific information is provided, to demonstrate that the impacts of the development could be realistically mitigated, and the overall impacts would not be severe. Namely, an updated modelling assessment should be provided to fully assess the impact of the proposed development in highways terms. The requirement for site specific modelling to be provided was noted by council officers during meetings regarding the scheme (see **Paragraph 4.7.8** of this report), however was not acted upon. When the site specific modelling is produced it must be made available to consultees and stakeholders with sufficient time for feedback to be provided, in order to ensure that the site has been consulted on in a meaningful way. Should the modelling show that an unacceptable impact on highways safety or residual impacts on the highways network, the impacts must be fully mitigated, or the site removed from the local plan.



APPENDIX A

Freedom of Information Request Output



[REDACTED]@canterbury.gov.uk>

UoK meeting 13.04 and next steps

To: [REDACTED]@canterbury.gov.uk> 14 April 2023 at 16:32
(Avison Young - UK) [REDACTED]@avisonyoung.com>
Cc: [REDACTED]@canterbury.gov.uk>, [REDACTED]@canterbury.gov.uk>,
[REDACTED]@kent.gov.uk>, [REDACTED]@wsp.com,&br/>[REDACTED]@wsp.com> [REDACTED]@kent.ac.uk, [REDACTED]@kent.ac.uk>,
[REDACTED]@avisonyoung.com

Dear [REDACTED]

Thank you for meeting with us yesterday. It was a very helpful meeting that allowed us to draw together the work that has been done to date.

We also had a useful discussion about the strategic importance of the University to Canterbury and wider East Kent, which is reflected in the Vision for the draft local plan. We acknowledged that the Universities, along with the valuable heritage in Canterbury, are major economic assets that are key to the future prosperity of the District.

The main focus of the meeting was to consider the transport implications of your proposals for housing on the land north of the University and what, if any, mitigation would be required if your site were to be developed as you propose. As these discussions are taking place through the pre-application process, our comments are of course given without prejudice to any future decision that will be made about your site through the Local Plan process.

It is understood that, in principle, the provision of two accesses would provide sufficient access to serve the site. Also, linking these two accesses would help to mitigate the impacts of additional traffic flow onto Tyler Hill. Along Rough Common Road improvements will be necessary and these appear to be achievable.

The outstanding issue which we discussed was the evidence around the impacts of the development on the city centre. There are particular issues at the London Road/Whitstable Road junction and the level crossing and the additional traffic on the already overloaded inner ring road, including the capacity at the St Stephens Hill / Giles Lane junction.

The wider Transport Strategy proposes a strategic solution for mitigating the impacts of the additional traffic that would come from the sites that have been identified in the regulation 18 draft Local Plan; of course the University site is not one of these so its impacts have not been assessed through this work.

The question that we agreed needs to be answered is whether inclusion of the University site would require further mitigation over and above that identified in the current iteration of the Transport Strategy. The obvious way of answering this question is to include the University site within a further model run and this would be necessary in any event before any regulation 19 plan is prepared for consultation and then submitted for Examination.

The initial thinking is that the inclusion of the University site would rely upon improvements to the highway network at Harbledown. However, you said that the assessments that you had carried out to date demonstrate that the inclusion of the University site shows that the impacts of the University in traffic terms would be adequately mitigated through the existing draft transport strategy. [REDACTED] has agreed to review your work and we agreed to meet again within the next two weeks to review the position and decide whether any further work would be needed at this stage.

We also discussed the issue of air quality in so far as it impacts upon the Blean Complex designated site. The initial opinion of our consultant is that your report, which concludes there would not be a likely significant effect on the Blean Complex, appears technically sound. However, he has raised some queries as to the methodology. You have now provided me with a response to his queries which I have sent to him for review. I hope to hear back from him, with his final advice, shortly.

I look forward to meeting with you in the next couple of weeks.

Kind regards,

[REDACTED]

Deputy Planning Manager - Development Management
Canterbury City Council
www.canterbury.gov.uk/planning