



Our ref: #18698

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**FAO: Canterbury City Council - Policy and Strategy Team**

16 January 2023

Dear Ms Asimaki,

**DRAFT CANTERBURY DISTRICT LOCAL PLAN TO 2045**

Thank you for your notification dated 24 October 2022 inviting National Highways to comment on the Draft Canterbury district Local Plan to 2045, seeking a response no later than 5pm on Monday 16 January 2023.

**Background**

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN; in this case, particularly the A2 that runs through the district, as well as other parts of the SRN likely to be affected by the Plan, for example M2J7 Brenley Corner and its vicinity. We have particular interest in any sites or infrastructure proposals which could have implications for these routes and the wider SRN network.

In accordance with national planning and transport policy and our operating licence, we are entirely neutral on the principle of development as it is for the local planning authority to determine whether development should be allocated or permitted; albeit it must comply with national policy on locating development in locations that are or can be made sustainable. Therefore, while always seeking early and fulsome engagement with local plans and/or developers, we will simply be assessing the transport impact of plans or proposals and agreeing any necessary mitigation.

In progressing Local Plans, we will seek to agree the following:

- Modelling methodology
- Baseline modelling i.e. to demonstrate that the model accurately predicts current flows
- Forecast modelling i.e. to assess the impact of proposed development; as appropriate, at various trigger points during the lifetime of the Plan; and at the end of the Plan period; and, if required, at full build out if that occurs after the end of the Plan period
- Outputs and outcomes of modelling, demonstrating, as appropriate, what mitigation will be required, in what form, where and when
  - It should be noted that a suite of modelling may be required that includes strategic modelling covering an area at least one major junction beyond the district boundary, localised network modelling where several links/junctions are close together and/or individual junction modelling
  - A DMRB complaint Merge/Diverge assessment may also be required for relevant grade-separated junctions
- The design of any mitigation, to at least General Arrangement design stage (provided this does not raise any immediate concerns for us) or preliminary design stage (including any required Road Safety Audits and Walking, Cycling, Horse Riding Assessment and Reviews). Whichever degree of detail is agreed, the products must be in full compliance with the Design Manual for Roads and Bridges
- Industry standard mitigation costings may should be produced, tested via independent assessment, and then agreed by National Highways.
- The framework setting out who has responsibility for promoting, funding, governance and the timing for any mitigation delivery. It should not be assumed that National Highways will have any of these responsibilities. Funding and delivery requirements should be detailed as part of the relevant Infrastructure Delivery Plan (IDP).
- If considered appropriate, a “Monitor & Manage” (M&M) framework, aimed at delivering mitigation or other infrastructure in a manner which responds to the real-world impacts of development. This can include the move from a ‘predict & provide’ style of delivery to ‘a vision & validate’ style; but must not be seen as simply a means to ignore issues now, hoping that circumstances in the future will be different.
  - Any M&M framework must be based on “worst case scenario” modelling and mitigation, as well as setting out the desired alternatives. It must set out details of responsibility, funding, governance and the timing for any mitigation delivery. It must be translated into plan policy and application conditions that clearly set out that if X development is to be occupied, Y mitigation must be in place unless Z M&M is agreed by National Highways that demonstrates an alternative form, level or location of mitigation is justified.

While ideally all of the above should be agreed prior to the Submission of the Local Plan, we recognise that this is not always possible. However, all parties should work towards

all matters being agreed and reflected in a Statement of Common Ground (SoCG) by the start of the Local plan Examination.

Ideally the SoCG between the Council and National Highways will track progress towards final agreement on all relevant matters starting from the earliest plan iterations until the final version is agreed ahead of the Examination.

It is acknowledged that Government policy places much emphasis on housing delivery as a means for ensuring economic growth and addressing the current national shortage of housing. The NPPF is very clear that:

*“strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.”*

However, new DfT C1/22 and the NPPF are equally clear that any development, including housing delivery, must be tempered by the requirement to ensure that it can be accommodated without unacceptable impacts on the safety, reliability and operation of the SRN. Therefore, as necessary and appropriate, any plan and/or development must be accompanied by suitable mitigation in the right places at the right time, that is to the required standards and is deliverable in terms of land availability, constructability and funding.

We would also draw your attention to the then Highways England document ‘*The Strategic Road Network, Planning for the Future: A guide to working with National Highways on planning matters*’ (September 2015) [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/461023/N150227 - Highways England Planning Document FINAL-lo.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/461023/N150227_-_Highways_England_Planning_Document_FINAL-lo.pdf)

This document sets out how National Highways intends to work with local planning authorities and developers to support the preparation of sound documents which enable the delivery of sustainable development.

### **Updated ‘Strategic road network and the delivery of sustainable development’ circular (C1/22)**

It should be noted that since the start of the consultation process on the Canterbury Local Plan, on the 23rd December 2022, the Department for Transport released a new circular on the ‘*Strategic road network and the delivery of sustainable development*’ (Circular 01/2022), which replaces all of the policies in Circular 02/2013 of the same name. These representations take account of the new circular and the requirements in terms of the Local Plan evidence base and process.

We request that the upcoming Canterbury Local Plan submission is prepared in line with all aspects of the new circular. Particularly, the principles of sustainable development

(paragraphs 11 to 17), new connections and capacity enhancements (paragraphs 18 to 25), and engagement with plan-making (paragraphs 26 to 38).

## **National Highways Representations**

### **Canterbury District Local Plan policies (October 2022)**

#### **Policy SS3 – Development strategy for the district**

The Garden Community Broad Location at Cooting Farm was not included in the adopted 2017 Local Plan and we should, therefore, be provided with sufficient evidence demonstrating the impact of this allocation on the SRN (See also our comments re Policy R1).

#### **Policy SS4 – Movement and transportation strategy for the district**

In line with circular 01/2022 paragraph 31, your evidence base should ensure that all options to reduce a reliance on the SRN for local journeys including a reduction in the need to travel and integrating land use considerations with the need to maximise opportunities for walking, wheeling, cycling, public transport and shared travel have been explored.

We should be provided with sufficient evidence that the Eastern Movement Corridor (EMC) is required and any implications for any required mitigation on the SRN, specifically at the A2 at Bridge.

We would also note that a DMRB compliant design for the upgrades at the A2 junction at Harbledown is yet to be agreed upon with us. Whilst a detailed design (see notes above in 'Background') may not be required for the plan making stage, we would suggest that Canterbury City Council (CCC) need to agree with us how this scheme will be assessed. This is in line with DfT Circular 01/2022 which states that:

*“New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway infrastructure. However, there cannot be any presumption that such infrastructure will be funded through a future RIS. The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy.”*

### Policy C5 to C10 – South West Canterbury

With regards to the South West Canterbury Link Road, we would request that you explain the scheme layout for the “new on/off slips on A2 Coastbound” that will be adopted when assessing the Local Plan.

### Policy C11 to C16 – East Canterbury

Your transport evidence base will need to provide with and without scenarios for the proposed EMC, so that we can determine whether a capacity enhancement to the SRN is required in accordance with paragraph 23 of circular 01/2022. In line with paragraph 23, alternative options to manage down the traffic impact of planned development or improve the local road network are a first preference.

### Policy W4 – South Whitstable

We acknowledge that the Land at Brooklands Farm (1,300 dwellings) allocation has the potential to generate significant traffic on the A299 connecting to the M2/A2 Junction. In accordance with circular 01/2022, appropriate consideration should be given to encouraging the use of sustainable modes for strategic journeys as well as local journeys (e.g. improved connectivity to Whitstable Railway Station).

### Policy R1 - Land at Cooting Farm

We are aware that one of the most significant additions to the emerging Local Plan, compared with the adopted 2017 Local Plan, is the inclusion of a new Garden Village at Land at Cooting Farm (3,200) dwellings. We envisage there to be a significant number of new trips using the A2 mainline and the A2/A260 junction as a result of the location of this development. Given the site's out of town nature and its potential to generate a significant number of additional car trips in the SRN, we would request that in line with circular 01/2022 paragraph 13 and 28, CCC should provide evidence of how the site can be made sustainable and clearly illustrate the opportunities to maximise walking, wheeling, cycling, public transport and shared travel whilst ensuring that the SRN is not being relied upon for the transport accessibility of the site.

The emerging Local Plan also requires that Land at Cooting Farm “provides proportionate contributions towards the Eastern Movement Corridor”. We will be able to determine whether a capacity enhancement to the SRN is required in accordance with paragraph 23 of circular 01/2022 when we are provided with the with and without scenarios for the EMC as requested above. In line with paragraph 23, alternative options to manage down the traffic impact of planned development or improve the local road network are a first preference.

### Policy DS7 – Infrastructure delivery

We are unable to comment on your delivery programme until the impact of the emerging Local Plan, and the required scheme(s) for mitigation, have been agreed upon. It may be necessary for us to comment further on CIL at such time there is greater clarity on other matters. However, you should note that SRN mitigation cannot be delivered through CIL as it does not provide the DfT Secretary of State with sufficient guarantee that monies collected will be spent on the required SRN mitigation. Hence SRN mitigation is delivered through a combination of Local Plan policy and S278 agreements.

### Policy DS14 – Active and sustainable travel

We would highlight that circular 01/2022 places an emphasis on walking AND wheeling throughout the document, the latter being to emphasise the needs of the those moving at walking pace but using wheeled assistance such as prams and wheelchairs. If such users are not adequately provided for, it often results in the need for car trips. We would hence request that CCC consider this distinction in the policy wording on active travel, including the movement hierarchy covered in policy DS13.

We support your policy wording that states that “proposals for more than 10 homes within the urban areas should be located no more than 400 metres from a frequent bus service”, subject to CCC clarifying the criteria which defines what a “frequent” bus service is.

We request that CCC include additional policy wording that encourages the strategic development sites to implement sustainable travel measures that reduce the number of single occupancy vehicle trips for strategic purposes and not just local journeys (i.e. appropriate bus and rail links).

### Policy DS15 – Highways and parking

We request the following policy wording/supporting text changes for policy DS15:

*Current wording: “Proposals for development that will generate a significant volume of traffic should be accompanied by a transport statement or assessment and a travel plan”*

*Requested wording:*

*Both of which should include the requirements of circular 01/2022 ‘Strategic road network and the delivery of sustainable development’ (updated 23 December 2022), when consideration of the development is required by National Highways”*

(The above can either be added to the policy or included as supporting text)

### **Transport Topic Paper (October 2022)**

We will require sufficient evidence demonstrating, firstly, that the proposed schemes are needed to support Local Plan development and secondly, that the A2 mainline/junctions will operate throughout the plan period without an unacceptable safety impact or the residual cumulative impacts being severe. Where an unacceptable safety impact or a severe cumulative impact is identified, we will need to agree upon any required mitigation scheme(s) once alternative options to manage down the traffic impact of development or to improve the local road network have been considered.

The Transport Topic Paper should clearly consider the transport strategy and residual car driver trips for the proposed Garden Village at Cooting Farm. This is because the proposed Garden Village at Cooting Farm is one of the most significant changes from the previously adopted Local Plan, it is distant from the main overarching transport strategy for Canterbury City outlined in Option 5 and has the potential to result in significant traffic flows on the A2.

### **Canterbury Local Plan – Preferred Strategic Growth Local Plan Option (October 2022)**

#### **Forecast baseline schemes**

We request to be consulted on the layout of the proposed baseline schemes, to ensure that the schemes which are included in the base scenario are committed and that the assessed layout corresponds with our understanding.

#### **Option 5V3 schemes**

Circular 01/2022 (and indeed circular 02/2013) states that capacity enhancements such as modification to existing junctions or road widening should only come after alternative options to manage down the traffic impact of planned development or improvements to the local road network have taken place as a first preference (paragraph 23).

Paragraph 31 states that the Local Plan evidence base should “explore all options to reduce a reliance on the SRN for local journeys including a reduction in the need to travel and integrating land use considerations with the need to maximise opportunities for walking, wheeling, cycling, public transport and shared travel”.

To this end, we would request a 2045 run of the model which includes the proposed Local Plan developments alongside the impact of maximising opportunities for walking, wheeling, cycling, public transport and shared travel, but without any capacity enhancements to the SRN (beyond those already committed). The evidence base should then clearly show whether this scenario would be anticipated to have an unacceptable safety impact or the residual cumulative impacts on the SRN would be severe. If so,

capacity enhancements should then be designed to mitigate the safety and/or residual cumulative impacts identified. Currently, the evidence base is not clear on what these impacts are and hence the most effective way of mitigating them.

### Development

We seek clarification from CCC as to how “committed” developments have been defined. This is because it is our understanding that the South Canterbury development that has been included as committed development for 4,000 dwellings relates to an active, undecided, planning application (reference: CA//16/00600). DfT Circular 01/2022 (footnote 21) defines committed development as: “development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next 3 years”. We acknowledge the history of Mountfield Park and simply require the evidence base to be clear on what is included as baseline/ reference case, what sensitivities are included and/or how else sites are being reflected in the evidence base

There are inconsistencies between the Forecasting Report and the draft Local Plan document. For example, the draft Local Plan document allocates development at Merton Park for 2,075 dwellings (not 2,283 dwellings) and development at Land at Cooting Farm for 3,200 dwellings (not 3,520 dwellings). We request that your uncertainty log is provided for review, to confirm that the allocations that have been assessed correspond with the policy wording in the Plan document.

### Trip rates

Given the need for the application of the new circular and the focus on maximising opportunities for walking, wheeling, cycling, public transport and shared travel, a review of the trip rates utilised in the modelling is required, considering how they may respond to this requirement (for example considering the principles set out in the TRICS Decide and Provide guidance, particularly for the larger allocations to ensure that the assumptions and mitigation considered at Local Plan stage are broadly in accordance with what may come forward at development stage). When this review has been completed, the TRICS output reports used by Jacobs need to be provided in order to determine the suitability of the TRICS analysis undertaken.

### Background traffic growth

The background traffic growth approach is considered satisfactory, however, we would request that the proposed growth factors for cars, HGVs, and LGVs are provided for review.

The sites which a reduction has been applied to should be clarified (either/or both of internalisation or sustainable mode reductions).



### Trip internalisation

A 5% internalisation factor has been applied to capture: residential trips by active modes/short trips to local services provided in the development sites, and encouragement for live/work/teleworking.

Further justification is required to show that 5% is a reasonable assumption (i.e. neither too high nor too low) to encompass reducing the need to travel by car for these purposes. Such evidence may include the proportion of jobs in the Canterbury district which can be undertaken from home, the number of trips undertaken to local facilities as well as the nature of the facilities considered e.g. shops / cafes / health facilities and/or any research CCC may have done regarding 20 minute neighbourhoods.

Furthermore, as a result of this evidence, wording is required within the policy for each of the allocations where a reduction due to internalisation has been applied, to ensure that proximity to the local facilities outlined in the evidence referred to above is provided within a suitably agreed distance. A requirement to provide high speed internet connections to facilitate working from home is also required as part of an appropriate policy, to further justify the internalisation factor agreed.

### Trip reduction due to sustainability

We note that an assumed reduction of car demand for development trips using bus corridors of 5% at a number of key sites. As with the internalisation factor, Tables 5-12 and 5-13 show trip reductions due to sustainability for other sites (e.g. Land at Cooting Farm). Therefore the sites which this has been applied to should be clarified.

### Trip generation

We are unable to comment on the proposed trip generation until the above further information has been provided for review (TRICS output reports, uncertainty log, and trip reduction assumptions).

### Trip distribution

It is stated that the full list of donor zones is available in Appendix B. We acknowledge that a table is provided in appendix B showing the development zones, development descriptions and donor zones, however, to allow for review, we would request that a map is provided presenting the development zones, development descriptions and donor zones. This is to ensure that the proposed selection of donor zones is robust, relative to the actual location of the developments. Subject to this review, there may be a need for an alternate methodology to be followed (e.g. a population distance gravity model).

## Summary of results – flow plots, LOS plots and journey times

We would note that the flows plots provided by Jacobs show that several sections of the A2 around Canterbury are predicted to experience flows greater than 3,200 vehicles (morning and evening 2045 5V3 scenarios). For example, the section between A2 Thanington and A2 Bridge is forecast to experience 3,372 vehicle in the morning peak and 3,324 vehicles in the evening peak. This would imply that an additional mainline lane may be required on certain sections of the A2 around Canterbury. To confirm whether this is the case, we would suggest that CCC should undertake merge and diverge assessments for the A2 within their authority and also for the A2/M2 junction. These assessments should consider the merge and diverge requirements at each junction in the morning and evening peak periods and, as previously stated, scenarios without capacity enhancements to the SRN should be provided initially, with further assessments with mitigation in place as required.

Additionally, the flow plots do not clearly show the eastbound and westbound flows on the M2, nor the flow at the A2 / A250 junction. We require this information to show the cumulative impact of the proposals (including Land at Cooting Farm).

In order to identify the impacts of the emerging Local Plan, the following information is required:

- Tables of flow increases (absolute and % difference) at key locations on the SRN;
- Plots and tables of changes to LOS at key SRN junctions; and
- Merge and diverge assessments at SRN junctions.

Once the impacts of the Local Plan are agreed (including a scenario considering maximising sustainable transport), more detailed junction capacity modelling is likely to be required to develop suitable schemes to mitigate significant impacts.

## Infrastructure delivery plan (October 2022)

Paragraph 33 of circular 01/2022 states that the approach to funding capacity enhancements to the SRN which are necessary to deliver strategic growth should be secured by a policy in a Local Plan or spatial development strategy. Therefore, we request that the approach to funding is detailed in the Local Plan document as well as the IDP.

## Sustainable Transport and Highways

Your transport strategy was designed to facilitate a switch to active travel modes for local trips and the council subsequently prepared a separate draft Local Cycling and Walking Implementation Plan [LCWIP]. The LCWIP includes a network of route proposals that integrate with existing routes, with key destinations and planned developments. The

schemes are not included in the draft IDP, but it is stated that they will be incorporated into later iterations following feedback. It is stated that an updated IDP will support a future Regulation 19 draft Local Plan consultation. The extent to which the cycling network proposals may support Local Plan allocations and the trip internalisation reductions outlined in the “Canterbury Local Plan – Preferred Strategic Growth Local Plan Option (October 2022)” section should be considered and any development requirements, in terms of contributions towards cycle networks or sections of route to be provided as part of site development, should be incorporated into site allocation policy wording.

### Cooting Farm Garden Community and Rural Areas

We request that you engage with us on the proposed railway station upgrades to ensure that the package of sustainable measures is proportional to the scale and potential impact from the Cooting Farm Garden Village allocation and that the impacts (which could be significant) are accounted for in the strategic modelling as set out in paragraphs 21 and 33 of circular 01/2022.

### Schedule A – Sustainable Transport and Highways

We are included as a “lead and delivery partner” for the “New A2 Junction to provide access to sites C6 Land at Merton Park and C7 Land to the north of Hollow Lane”. We would refer to paragraph 29 of DfT Circular 01/2022 that states that:

*“New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway infrastructure. However, there cannot be any presumption that such infrastructure will be funded through a future RIS. The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy.”*

While we will need to agree the form of the upgrade (should it be required), there should not be any presumption that it will be funded through a future RIS. CCC will be responsible for the scheme’s promotion, funding and delivery.

### Conclusion

We conclude that while the inclusion in the plan of the overarching principles of encouraging sustainable development are welcomed, further evidence will be required to

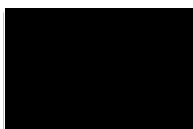
understand the direct, indirect and wider impacts on the SRN as part of the site selection process and identification of infrastructure to support the level of growth set out in the Local Plan.

Therefore, we will require further details regarding the selection of sites for development and to be informed of future development of the Canterbury District Plan and the policy framework that will apply to them.

We look forward to working with the Council as the Plan progresses and would be pleased to meet once you have had an opportunity to consider all representations received.

In the meantime, if you have any immediate queries, please contact us via [planningse@nationalhighways.co.uk](mailto:planningse@nationalhighways.co.uk).

Yours Sincerely



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