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Dear Sir/ Madam

National Highways Representation Draft Canterbury District Local Plan: Focused consultation 2025

Thank you for your email of 9 September 2025 consulting National Highways on the Draft Canterbury District Local Plan: Focused consultation 2025); seeking a response no later than 21 October 2025.

Background

National Highways is the government owned company which operates, maintains and improves the Strategic Road Network (SRN) as the strategic highway company appointed under the provisions of the Infrastructure Act 2015 and in accordance with the [Licence](#) issued by the Secretary of State for Transport.

National Highways is a statutory consultee to the planning process. It has a specific obligation to deliver economic growth through the provision of a safe and reliable SRN in line with the provisions set out in [DfT Circular 01/2022: The strategic road network and the delivery of sustainable development](#).

Further information about National Highways' role in the planning system and how we are aiming to be a proactive planning partner can be found at <https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/> .

Representation

We have reviewed the suite of online documents and have the following comments from the SRN perspective.

Introduction

- 1** National Highways (NH) has been consulted by Canterbury City Council (CCC) in relation to their Regulation 18 (Focused Consultation) for the Canterbury Local Plan.
- 2** The original Regulation 18 consultation for the emerging Local Plan took place in April and May 2024; and National Highways made representations at that time. Subsequent to this

consultation taking place, CCC have undertaken additional work, primarily concerned with identifying additional sites for potential allocation, in order to meet the increased housing target for the district which has arisen as a result of the update to the National Planning Policy Framework (NPPF) in December 2024.

- 3 This “focused consultation” is specifically seeking comments on the proposed revisions to the potential allocation sites under consideration; this comprises identification of additional sites and revision to quanta for certain previously identified sites. For avoidance of doubt, the consultation documents clearly state that the consultation is limited to these specific questions and is not seeking further or updated comments on the previous Regulation 18 documents.
- 4 The Focused Consultation materials comprise
 - a “Focused Regulation 18 Topic Paper” (dated August 2025)
 - and supporting documentation relating to
 - Housing Need, the Strategic Land Availability Assessment,
 - an updated Call for Sites,
 - Gypsy and Traveller provision,
 - Retail and Leisure study update,
 - Economic Development and Tourism update,
 - Strategic Flood Risk Assessment, Sustainability Appraisal and
 - Habitats Regulation Assessment.

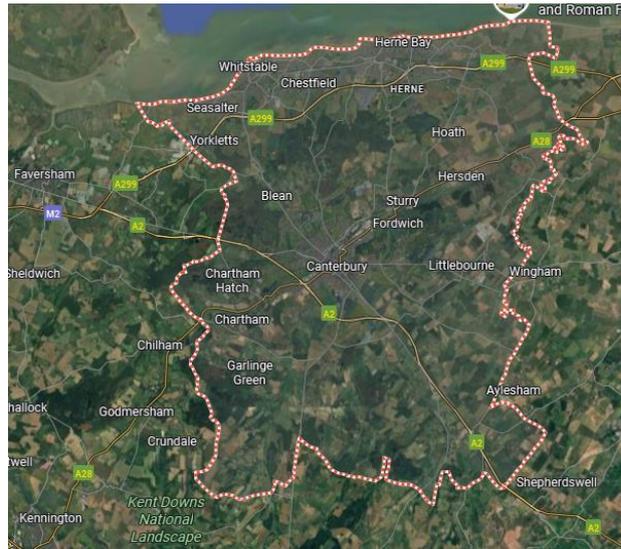
No updated Transport documentation is provided, and no specific additional transport technical work has been undertaken at this stage.

- 5 The following therefore presents a qualitative assessment of the overall change in development quanta, a high-level appraisal of the additional sites, and their potential impact on the Strategic Road Network.
- 6 **The changes to the potential development sites will need to be recognised and addressed in the scoping discussions which are expected to take place prior to the commencement of the next stage of transport technical work (i.e. to inform the subsequent Regulation 19 consultation).**
- 7 **In particular, we will wish to hear the Council’s position with regards the lifespan of the Local Plan and the evidence base to support it. NPPF (2024) paragraphs cover strategic matters of which transport is one. Local Plans and the evidence base are expected to look at least 15 years beyond the date of adoption. The Canterbury LDS indicates likely Local Plan adoption in 2027 while Paragraphs 1.1 to 1.7 of the R18 Focussed Consultation indicate an intention to change the end year to 2042/43. Therefore, we will wish to understand the changes to the evidence base to support this.**

Canterbury District and the SRN

- Canterbury district is indicated in figure 1 below. The A2 runs forming a key part of the Strategic Road Network (SRN) runs through and serves much of the district. But consideration and evidence base material is also required with regards the impact of the Local Plan proposals beyond the district boundary, alone and/or in combination with other emerging Local Plans. For example, with regards M2J7 Brenley Corner.

Figure 1 Canterbury District



Previous R18 National Highways Representations

- NH has previously provided comments on the previous Regulation 18 stage of the Local Plan study in June 2024 as described above. Action points within this previous response included the requirement for baseline conditions on the highway network (current and end of plan period) that factors in current commitments without the local plan; ideally strategic transport modelling testing strategy for the Local Plan, along with the IDP being further detailed. All of these points remain valid and will need to be addressed through further discussions with CCC, KCC and their consultants (Jacobs).

Review

- The Regulation 18 focused consultation topic paper summarises the changes to the previously considered allocated sites. It is noted that for the most part, the previously considered sites have not changed, and the Focused Regulation 18 consultation adds sites to be considered into the Local Plan quantum.
- The regions considered in the document are as follows:
 - Canterbury area;

- Whitstable area;
 - Herne Bay area; and
 - Rural area.
- 12** The housing allocations considered in the previous Regulation 18 draft Local Plan are presented beneath paragraph 2.24 of the Focused Consultation document. The yield of all the sites from the previous consultation totals 4,161 dwellings. Two sites are proposed for removal from the previously undertaken Regulation 18 study, namely the Land north of the University of Kent, and Land to the north of Hollow Lane. This is due to concerns over suitable access and impact on the surrounding highway network (paragraph 2.34). It is considered that these concerns have been informed by comments from both KCC and National Highways at the previous regulation 18 consultation, in particular the routing of development traffic to and from the SRN, and the uncertainty around the ability of the sites to support credible sustainable alternatives to car travel.
- 13** We note the apparent intention of the University of Kent to continue to pursue their proposals. As per national policy and the terms of our Operating Licence, we will remain neutral with regards the principle of the development but will engage as appropriate with all parties to discern any impacts on the SRN that would arise from the proposals and seek to agree any necessary mitigation accordingly.
- 14** The new and updated sites identified for development are indicated after paragraph 2.41, of which the revised total yield is 5,425 dwellings. The largest sites in the Canterbury area are noted to be the Land at Merton Park – 1930 dwellings (N1), Land South of Littlebourne Road – 1,520 dwellings (N4), and Land south of Bekesbourne Lane – 860 dwellings (N5).

South West Canterbury Strategic Development area

- 15** Policies N1 – N3 of the Focused Regulation 18 consultation consider sites within the South West Canterbury region. The following sites have been identified to be in proximity to the SRN.

Policy N1 - Land at Merton Park

- 16** Policy N1 concerns the Land at Merton Park site. This site was considered in the previously submitted Local Plan consultation, significant changes to the site transport and access strategy are proposed, including:
- The removal of the requirement to deliver new slip roads to the coastbound carriageway of the A2;
 - The 310 dwellings previously considered under Land at Ridlands is now proposed to be removed from the Merton Park area, and adopted under Policy CF1 (Strategic Allocations);
 - The removal of a park-and-ride facility within Merton Park due to the A2 slip roads no longer being proposed.
- 17** It is noted that National Highways and KCC have been informally consulted by the developers of Merton Park and CCC on the revision to the slip road proposals, and that these changes are to be made feasible in principle through the delivery of the new 4th slip

at the adjacent Wincheap junction, which is now being brought forward as part of works to support delivery of housing allocated in the current adopted Local Plan.

- 18 The concept masterplan for the Site indicates the main vehicular access to the Site would be from the southeast of the site from Hollow Lane.
- 19 Approximately 1930 dwellings are proposed within the development site. This is a significant reduction from the quantum of 2,250 dwellings proposed in the previous Regulation 18 consultation.
- 20 It is also noted that a secondary vehicular access from Nackington Road is proposed in the Focused Consultation, located immediately to the north of the A2.
- 21 **While the formerly proposed slip roads are no longer part of the proposals, it will be necessary for the evidence base to carefully and fully assess the impact of the proposals on the SRN. For example, while active and sustainable transport links to the city centre are included, it would seem inevitable that occupants and visitors would also wish to make use of the nearby A2, especially for longer distance journeys. Therefore, we need to understand the impacts of traffic seeking to gain access to the A2, for example, at Wincheap or Bridge (as the junctions currently exist or are proposed to be amended). Therefore, further details will need to be provided as part of the Regulation 19 TA to ensure development that Merton Park does not have adverse impacts on the SRN.**

Policy N2 - Land at Langton Lane

- 22 The Land at Langton Lane site is also proposed within the focused Regulation 18 study. While this is located a short distance to the northwest of the Land of Merton Park and a short distance from the Nackington Road overpass, the estimated capacity of the site is 14 dwellings, therefore this is anticipated to have minimal impact on the SRN.

Policy N3 - Thanington Recreation Park

- 23 The Thanington Recreation Park is proposed to be located to the west of the Wincheap Interchange. The proposals include a park and ride facility which is to provide approximately 900 parking spaces and associated infrastructure. A separate Transport Assessment to indicate the anticipated impact is to be provided for the development. **The scope of this TA should be discussed and agreed with National Highways prior to its production and relevant data and assumptions will need to be incorporated into the wider Regulation 19 strategic modelling exercises. In particular, the location of the site access and the interplay of this access with the other nearby current/ planned A2/A28 junctions at Wincheap.**

East Canterbury Strategic Development Area

- 24 The East Canterbury region is comprised of the sites pertaining to Policies N4 – N7. The sites in proximity to the SRN are assessed below.

Policy N4 - Land South of Littlebourne Road

- 25 The Land South of Littlebourne Road is located approximately 1.7km to the north of the A2/A2050 Roman Road and would accommodate approximately 1,520 dwellings. Traffic from this site would primarily be expected to access the SRN via the existing and/or planned A2/A2050 Bridge junction.

Policy N5 - Land South of Bekesbourne Lane

- 26 The Land South of Bekesbourne Lane site is located approximately 1.1km to the north of the A2/A2050 Roman Road and would accommodate approximately 860 dwellings. Traffic from this site would primarily be expected to access the SRN via the Harbledown junction.

Policy N6 - Land North of Bekesbourne Lane

- 27 The Land North of Bekesbourne Lane site is located approximately 1.8 km to the north of the A2/A2050 Roman Road and would accommodate approximately 67 dwellings. Traffic from this site would primarily be expected to access the SRN via the existing and/or planned A2/A2050 Bridge junction. It is noted that a series of active travel facilities have been identified for the Site.

- 28 **Policies N4 to N6 cumulatively will introduce 2,487 dwellings to the A2050 corridor and as such a significant impact is likely to be observed at the existing/ planned Bridge junction. The strategic modelling work will need to ensure that these proposals are reflected in the modelling specification, in a manner which is consistent with the requirements for sites to present and justify an appropriate “Vision” and corresponding trip generation and mode share assumptions. We will need to understand the degree to which these proposed allocations can be, individually and/or collectively, accessed independently of the development of Mountfield Park, or whether build out would have dependencies.**

Canterbury Urban Area

- 29 The Canterbury Urban Area is located within and surrounding the Canterbury city centre, this is located to the northeast of the A2 Wincheap Interchange, relating to Policy N8 – N19. A majority of the sites are small in scale (with a combined total of 94 dwellings) and therefore their impacts will be captured as part of the Regulation 19 modelling; no additional comments are considered necessary at this time. Sites N10 is considered separately below.

Land at Military Road (Policy N10)

- 30 The Land at Military Road site is located to the east of the Canterbury urban area. The proposed capacity of the site is 180 dwellings. The site is located approximately 4.1km to the northeast of the A2 Wincheap Interchange; the scale of development is such that it is not expected to exert a material impact on the junction in its own right. However, an appropriate Vision will be required to demonstrate how the site will contribute to the wider goals of the Local Plan in transport terms and be consistent with the requirements of Circular 01/22.

Rural Sites

- 31 The rural sites proposed within the Focused Regulation 18 study are located across the Canterbury region (Policy N31 – N34). A majority of these sites are noted to be located a significant distance from the SRN and accommodate small numbers of dwellings, however those in close proximity to the SRN are noted below.

Policy N34 - Barnham Layby

- 32 The Barnham Layby is located immediately to the east of the A2. This is to comprise a vehicle resting area with up to 20 HGV parking spaces. The Layby is expected to provide additional facilities for existing HGV traffic and is not of a scale where it would be expected to “attract” HGVs away from other routes. We have been working with several parties with regards the replacement of layby facilities to be lost elsewhere. **This location appears to have potential, but further work will be required by all the parties, that includes the Council, before any design, funding and implementation can be agreed.**

Comparison to Previous Regulation 18 Draft Local Plan

- 33 The Focused Regulation 18 Consultation provides an updated quantum for further development sites within the Canterbury region in addition to those considered in the previous Draft Local Plan stage.
- 34 National Highways’ response from June 2024 requested actions relating to the University of Kent proposed allocation site and the A2 Merton Park off-slips which have now been removed from Local Plan proposals.
- 35 The other main action points of providing transport information including strategic transport modelling testing strategy for the Local Plan and further information on the Infrastructure Development Plan remain outstanding.
- 36 **It is recommended that, following completion of the Regulation 18 focused consultation, a further discussion is held with CCC, KCC and Jacobs to confirm how the proposed amendments to the proposed allocation sites will be represented in the strategic modelling and other elements of the Regulation 19 TA, including any associated requirements for mitigation.**

Next Steps

National Highways is committed to working closely with all parties to facilitate this Local Plan commensurate with our obligations with regards the safety, reliability and operational efficiency of the SRN.

We will work with Canterbury seeking to address all outstanding matters. Subject to progress, we recognise we may need to make R19 representations and, in due course, participate in the Local Plan Examination.

If any party has any queries with regards our representations, please contact us via PlanningSE@nationalhighways.co.uk

Yours sincerely



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