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Via email: consultations@canterbury.gov.uk

18 May 2026

Dear Planning,

NETWORK RAIL RESPONSE TO DRAFT CANTERBURY DISTRICT LOCAL PLAN (2042/43)

These representations are submitted to Canterbury City Council ('the Council') by Network Rail Infrastructure Limited ('Network Rail'), in respect of the draft Canterbury District Local Plan (2042/43) Regulation 19 consultation ('the Local Plan').

On the path towards Great British Railways (GBR), Network Rail (NR) and Southeastern railway have formed South Eastern Railway (SER) which operates services through Canterbury and into Kent. Therefore, these representations should be considered as a joint railway response covering the SER route. NR remains the statutory consultee on planning applications and planning consultations.

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.

NR is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland, and Wales. As statutory undertaker, NR 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).

Representations

NR welcome the opportunity to comment on the Local Plan and our comments are set out below. NR also appreciates the on-going discussions with the Council and officers as the Local Plan has developed. The following areas are covered within NR's response to the Local Plan consultation:

- Spatial Strategy
- Canterbury
- Whitstable
- Herne Bay
- Rural Areas
- Strategic Site Allocations

Spatial Strategy

Policy SS5 – Movement and Transportation Strategy for the district

NR welcome the draft Policy to encourage modal shift, including upgrades to railway stations as in paragraph 2a.

Policy SS6 - Infrastructure Strategy for the district

NR notes that the draft Policy includes several necessary improvements to support strategic development allocations and that these are in addition to key transport infrastructure improvements. It is important to maintain this distinction to ensure that the strategic development allocations do not wholly swallow up, or are prioritised for, funding opportunities.

Canterbury

Policy C1 - Canterbury City Centre Strategy

NR continues to support the promotion for sustainable transport as part of the wider strategy for the city centre as set out in paragraph 1. Canterbury West rail station provides direct services to London in under an hour and plays a crucial role in supporting tourism by getting visitors to Canterbury. Opportunities continue to be pursued to improve the operation of the station to benefit passengers, including extending the platforms and exploring a new northern entrance onto Roper Road. Recently, improvements have been made to the existing southern entrance to help alleviate queuing at the gateline however further interventions will be needed to ensure the station remains able to meet demand. NR welcomes third party and developer contributions being directed towards the station to further improve sustainable transport modes in the city centre. The draft Transport Strategy should include reference to s106/CIL contributions in Table 7.4 for Canterbury West northern entrance.

Canterbury East station also aides travelling to and from the city centre albeit its location is not as prominent as Canterbury West and does not benefit from high-speed rail links. Notwithstanding that, Canterbury East remains a well-used station and is particularly able to assist sustainable transport journeys for draft site allocations to the south of the city centre.

Policy C5 - Land north of Canterbury West Station

NR is promoting this draft site allocation to enable railway infrastructure improvements alongside working with our partners, Platform 4, who are owned by Department for Transport (DfT) and NR and set up to deliver increased development around railway stations. NR supports the principle of 'innovation hub and railway infrastructure improvements with supporting residential development'. Paragraph 1a, states approximately 11 dwellings at the site. NR and Platform 4 have undertaken initially work to identify the potential for 11 houses or 22 flats on the site identified for residential development. To maximise development around transport hubs, such as railway stations, the quantum of development should allow for a mix of housing that could be brought forward. Flexibility in the wording for the draft allocation would help to support this aim. 'Approximately' may be sufficient given it doesn't provide an exact number, NR would just like to highlight the need for degree of flexibility.

The draft allocation allows for the bringing forward of a new access onto Roper Road as set out within our response to Policy C1 and included within paragraph 3a. This is currently unfunded, however a combination of enabling development within the allocation and opportunity for development that will benefit from a northern access would help to realise the delivery.

NR supports the draft site allocation within the Local Plan.

Policy C6 - Land at Station Road East

NR is promoting this draft site allocation to enable railway infrastructure improvements alongside working with our partners, Platform 4, who are owned by DfT and NR and set up to deliver increased development around railway stations. NR supports the principle of the draft allocation to provide a mixed-use development, with 37 dwellings. This allows for maximising land around rail stations. As in paragraph 3a, there is a need to ensure provision of adequate car parking at the station to meet existing and future demand. SER continue to monitor the capacity at the station car park.

NR supports the draft site allocation within the Local Plan.

Policy C8 - Canterbury City Centre Regeneration Opportunity Areas

NR notes the proposal to bring forward development briefs (or similar). NR wish to be involved in this process to help support sustainable transport and develop opportunities to improve the railway as per paragraph 2a of draft Policy SS5 in the Spatial Strategy.

Policy C10 - Land at Merton Park

NR supports paragraphs 4 iii and b of the draft Policy in outlining the improvements to connections to Canterbury East station and at the station itself. Canterbury East is well located to support sustainable transport journeys for those living or working at the site. We welcome continued engagement as to how those improvements could be maximised for the benefits of new users and how these can be encouraged to use the railway.

Policy C14 - Milton Manor House

NR supports paragraph 4 b of the draft Policy in outlining the improvements to connections to Canterbury East station and at the station itself. Canterbury East is well located to support sustainable transport journeys for those living at the site. We welcome continued engagement as to how those improvements could be maximised for the benefits of new users and how these can be encouraged to use the railway.

Policy C15 - Land south of Littlebourne Road

NR supports paragraph 4 iv and d of the draft Policy in outlining the improvements to connections to Bekesbourne railway station and at the station itself. Bekesbourne station can support sustainable transport journeys for those living at the site. We welcome continued engagement as to how those improvements could be maximised for the benefits of new users and how these can be encouraged to use the railway.

Policy C16 - Land south of Bekesbourne Lane

NR supports paragraph 4 iv and d of the draft Policy in outlining the improvements to connections to Bekesbourne railway station and at the station itself. Bekesbourne station can support sustainable transport journeys for those living at the site. We welcome continued engagement as to how those improvements could be maximised for the benefits of new users and how these can be encouraged to use the railway.

Policy C18 - Wincheap Commercial Area

NR supports paragraphs 4 ii and b of the draft Policy in outlining the improvements to connections to Canterbury East station and at the station itself. Canterbury East is well located to support sustainable transport journeys for those living or working at the site. We welcome continued engagement as to how those improvements could be maximised for the benefits of new users and how these can be encouraged to use the railway.

Policy C25 - Land at St Stephen's Road

The draft Policy should include the need for the development to consider its impact, from pedestrians, cyclists and vehicles, on the nearby level crossing on St Stephen's Road within a Transport Assessment. This should discourage the use of the crossing and where possible promote 'car lite' or 'car-free' development. In the interests of soundness, the above should be included to ensure full consideration of all impacts around the development to ensure this complied with national policy and is justified. NR suggests the following wording:

d. Mitigate and/or minimise noise impacts from the nearby railway line. *Consideration of the impact of all travel modes from the development on the nearby St Stephen's Road level crossing should be included within a Transport Assessment.*

Policy C30 - Land at Folly Farm

The site sits immediately adjacent to a footpath level crossing. This brings increased risk to future occupiers and the draft Policy must ensure that the level crossing is sufficiently considered. Without this, the allocation cannot be sound as it would not comply with national policy and would not be justified. This is especially important given the draft Policy highlights walking and cycling connections close to the level crossing. To remedy this, the following wording is required:

Mitigate and/or minimise noise impacts from the nearby railway line. Consideration of the impact of pedestrians and cyclists from the development on the adjacent level crossing should be included within a Transport Assessment.

The draft Policy also fails to consider the impact of the adjoining railway.

WhitstablePolicy W1 - Whitstable Town Centre Strategy

Whilst outside the town centre boundary, the strategy should improve connections to Whitstable railway station. This will support tourism and night time economy by encouraging use of the rail network. Wording to this effect could be included within paragraph 9 to deliver

wayfinding to the station as part of public realm improvements. This is considered necessary to make the draft Policy sound and ensure it complies with national policy. The following wording (in italics) should be included:

Enhanced public realm and digital infrastructure will further increase accessibility and connectivity between different areas providing for shopping, public art, community and leisure events and festivals *as well as improved connections and wayfinding towards Whitstable railway station.*

NR is seeking to enable a step free access at Whitstable station however funding for this is sought. To assist in accessing funding, third party/developer contributions would be beneficial. The two references to step free access in Table 7.4 of the draft Transport Strategy should be updated to include s106/CIL contributions as a funding mechanism.

Policy W4 - Land at Brooklands Farm

The site is located equidistant from Whitstable and Chestfield and Swalecliffe stations. Passenger facilities at Chestfield and Swalecliffe are very limited and it is noted that the draft Policy proposes connections via site 12 within paragraph 4a iii. However, the reference in paragraph 4d is welcome in ensuring improvements to both Whitstable and Chestfield and Swalecliffe stations given both are accessible from the site. Whitstable station is seeking funding for a step free access scheme between both platforms so that more users can use the station. NR considers the draft Policy sound in its current form.

Policy W7 – Land at Bodkin Farm

NR supports the inclusion of paragraph 4a ii and b in supporting use and improvement of Chestfield and Swalecliffe station.

Herne Bay

Policy HB1 - Herne Bay Town Centre Strategy

NR supports the reference in paragraph 11 of the draft Policy to improving connectivity to Herne Bay station. The station has recently undergone significant improvement with an Access for All (AfA) scheme delivered to aid improved access for those with mobility issues. Encouraging use of the station to benefit from the AfA scheme should be prioritised.

Policy HB5 - Land to the West of Thornden Wood Road

NR supports paragraph 4a ii of the draft Policy to improve connections with Herne Bay and Chestfield and Swalecliffe stations.

Policy HB9 – Land at Home Farm, Strode Park

NR supports paragraph 4a i of the draft Policy to improve connections with Herne Bay station.

Policy HB10 – Land to the west of Bullockstone Road

NR supports paragraph 4a i of the draft Policy to improve connections with Herne Bay station.

Policy HB11 – Altira

NR supports paragraph 3a ii of the draft Policy to improve connections with Herne Bay station.

Policy HB14 - Eddington Business Park

NR supports improving walking and cycling routes to Herne Bay station as stated in paragraph 5.

Rural Areas

Policy R3 – Chartham Paper Mill

NR supports improving pedestrian and cycle access to Chartham railway station as at paragraph 4b.

Policy R9 - The Hill, Littlebourne

NR supports improving cycle access and parking at Bekesbourne railway station as at paragraph 4b.

Policy DS15 - Infrastructure delivery

NR supports the draft Policy and consider it to be sound.

Policy CF1 - Strategic Site Allocations

Site 2 – Land at Sturry/Broad Oak

NR continues to support contributions towards the New Sturry Relief Road to reduce use of Sturry level crossing and to achieve closure of other railway crossings.

Summary

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. We trust our comments above will be considered and amendments made to ensure the Plan is sound.

Kind regards,

Craig Hatton MRTPI
Senior Town Planner