



Our ref: NH/26/15546
Your ref: Canterbury District Local Plan
(Regulation 19) consultation

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FAO: Consultations Team
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18 May 2026

Dear Consultation Team

Canterbury Local Plan 2026-42/43 Pre-Submission Draft (Regulation 19) Consultation

Thank you for inviting National Highways (NH) to comment on the Canterbury Local Plan 2026-42/43 Pre-Submission Draft (Regulation 19) (March 2026), seeking a response by no later than 5PM on 18 May 2026. As a statutory consultee, we wish to make representations as set out in this letter.

We appreciate that the focus of this consultation is on legal compliance and the soundness of the Local Plan as judged against the soundness tests in the National Planning Policy Framework (NPPF) (December 2024) para.36. We have structured our response accordingly.

The soundness tests are that a Plan must be:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Policy Context

As I am sure you are aware, NH is responsible for the Strategic Road Network (SRN), with our focus being on its safety, reliability and operational efficiency. In the vicinity of Canterbury, the SRN comprises the A2 east of M2 Junction 7, to a point west of the A2 / Lydden Hill junction.

The policy of the Secretary of State for Transport in relation to the SRN is Circular 1/2022 (C1/22): *Strategic road network and the delivery of sustainable development* <https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development> . In responding to this consultation, NH has taken C1/22 as relevant national policy alongside the NPPF.

In accordance with national planning and transport policy we expect the plan-making process to 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.

NH is obliged to raise its concerns with regards to any unacceptable safety or congestion impacts on the SRN.

The remainder of this response is split into three parts:

1. **Part 1: Legal Compliance** – This is focused on how Canterbury Council has engaged with NH during the plan-making process on strategic transport matters relating to the SRN.
2. **Part 2: Soundness Tests** – This is focused on the soundness tests and how plan-making has considered and responded to transport-related matters that are likely to impact on the SRN, as well as compliance with national policy on transport matters, in particular national policy on the SRN (C1/22).
3. **Part 3: Detailed Representations** – These are focused on detailed comments on individual policies relating to strategic transport matters that are likely to impact on the SRN. In some cases, they highlight how the robustness of the policies could be improved through some minor modifications.

National Highways' Response

Parts 1, 2 and 3 set out National Highways' representations on the Plan, with reference to legal compliance and the soundness tests.

Our representations are set out in Plan order.

Part 1 Legal Compliance

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NH001		Legal compliance: Duty to Co-operate	Noting the Government's November 2025 Written Ministerial Statement on the Duty To Co-operate, but also the NPPF requirement for strategic matters, including transport, to be dealt with on a cross-boundary manner, we have no objection in terms of legal compliance and/or duty to co-operate in connection with strategic road network related matters. This is because Canterbury City Council has engaged with NH constructively, actively and on an ongoing basis on strategic transport matters relating to the SRN during the preparation of the Local Plan. NH commits to working with all parties to resolve the remaining outstanding matters, be it in the period before submission or in the period up to the examination. NH would content to capture this process in a Statement of Common Ground prior to the Local Plan being submitted for examination. The SoCG can be updated as appropriate ahead of the examination. NH will appear at Local Plan Examinations if there are outstanding matters at that time and/or to assist the Examination Inspector with their MIQs.

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Part 2 Soundness

NH002		Soundness: Justified (Supporting Evidence Relating to Transport)	We are content, from the NH/SRN perspective, that the documents noted below, subject to necessary continued joint working to evolve, finalise and agree all outstanding matters (but especially with regards M2J7 and A2 / A28 Wincheap), provide appropriate, proportionate evidence of the methodology and assumptions applied to the Regulation 19 modelling and associated assessments have been developed and, in principle, agreed. We are content that there are no reasons to believe that the outstanding work cannot be completed in a timely manner to support the LP Examination in due course. The Regulation 19 documents (all available on the LP website) considered to be relevant to matters of interest to National Highways are as follows: • Main Regulation 19 Consultation Document (March 2026) • Draft Canterbury District Transport Strategy (March 2026) • Canterbury Transport Modelling Forecast Report (February 2026) • Local Cycling and Walking Implementation Plan (February 2026) • Canterbury Bus Action Plan (February 2026) • Understanding Travel Behaviour Change Insight Paper (2025) • Origin Destination Study (February 2026) Of these documents, National Highways has previously been consulted on and provided comments in connection with, the Transport Modelling Forecast Report, LCWIP, Bus Action Plan, Understanding Travel Behaviour Insight Paper, and Origin Destination Study documents. The
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			comments previously made on these documents have been taken into account in the versions published in support of this consultation.
NH003	Pages 7 and 8	Consistent with National Policy: Vision for the District and Spatial Objectives	We are content, from the NH/SRN perspective, that the spatial strategy set out as the basis for the Regulation 19 plan is consistent with that which has underpinned the transport technical work. The objectives for the Local Plan specifically refer to the creation of a transport network with a focus on district-wide public transport provision and low carbon transport. This reflects the change of direction from the previous iteration of the Local Plan and establishes this goal as fundamental to the success of the Plan as a whole. This is well aligned with the requirements of both the NPPF and Circular 01/22.
NH004		Consistent with National Policy: Transport Forecasting and Assessment (Modelled Future Years)	National Highways, for the reasons set out below, is content that whilst the submitted Regulation 19 modelling does not formally comply with the future year timescale requirements set out in current guidance (including Circular 01/22), the form and magnitude of this non-compliance is not expected to have a material impact on the conclusions drawn from the strategic and local modelling work, and therefore the outputs are considered acceptable for these purposes. It is nevertheless expected that a fully compliant future year assessment will be agreed for all Local Plan sites as they are brought forward to the application stage. This is addressed in the wording of Policy DS18 (see comment below). It has previously been noted by National Highways in our response to the focused Regulation 18 consultation that the assessment year used for the transport work (2040) does not meet the requirements for Local Plans to cover a period of 15 years from adoption. As is stated at section 2.4 of the forecasting report prepared for Regulation 19, 2040 remains the assessed

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			year for the future year scenarios (Future Baseline and DS1, DS2 and DS3). Assuming that Examination and adoption occur either in 2027 or 2028, the corresponding year to represent a 15-year period would be 2042 or 2043. It is noted that the stated end date in the submitted Regulation 19 plan is 2042/43. The following points are observed as to the expected differences between the provided 2040 models and any 2042/43 version had it been produced: • The uncertainty log captures consented developments within the Canterbury area; it is not believed that there are any significant developments which have consent now which have been excluded from these logs (on the basis that they would commence after 2040). • The current large sites with consent (such as Mountfield Park) are assumed to be fully constructed by 2040. • Sites in the emerging Local Plan are understood to be assumed to be fully constructed by the stated end date of the Plan (2042/43) and all of the movements associated with these sites at completion are represented in the modelling (i.e. no discount has been applied on site trips as a result of the differing future years). • The use of TEMPro to represent development in adjacent local authority areas currently models development up to 2040. Re-calculating the TEMPro figures for 2042 or 2043 would be expected to add a small amount of traffic to these figures (estimated at between 1 and 2% for cars). This degree of change would not be expected to result in a material alteration in the performance of the networks within the KTM or the application of corresponding figures to Local Junction modelling. • All expected improvements and changes to the local and strategic road networks which have been identified that are not directly related to

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			the emerging Local Plan (including introduction of the Lower Thames Crossing) are expected to be implemented well before 2040. There is no current evidence of any other transport improvements which are currently committed for delivery but which would come into operation between 2040 and 2042/3. It is further noted that a full updating of the strategic modelling work will be required to support the first review of the Local Plan once adopted, which would be expected to occur no later than 5 years from the date of adoption of the currently proposed Local Plan.
NH005		Consistent with National Policy: Transport Forecasting and Assessment (Scope and Conclusions)	While National Highways, as set out below, is generally content with the modelling work, further work and then design work will be required. This will assist the Council demonstrate with the LPs Vision (the what and why) and Validate (the how/who/funding/governance) C1/22 compliance. The strategic modelling work has included assessment of the following junctions on or near to the SRN: - o M2 Junction 7 (Brenley Corner) - o A2 / A2050 / Rheims Way - o A2 / A28 Wincheap Junction - o A2 / A2050 Dover Road - o A2 / A2060 Dover Road Whilst all of the modelled scenarios have been considered, scenario DS2 is most closely aligned with the definitions set out in DfT Circular 01/22 in terms of “residual” vehicular demand once reasonable and suitably evidenced measures to reduce car-based travel have been accounted for (including consideration of how this corresponds to the 10% modal shift figure).

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			The appraisals of the strategic modelling data for the identified junctions have identified positive effects on traffic demand in scenario DS2 compared to the future baseline and DS1 scenarios. It has been agreed through dialogue with CCC and KCC that additional specific testing will be undertaken for M2 Junction 7 as the strategic model data indicates that the current residual impacts will be further affected by other developments in the vicinity of the junction in Swale. However, these impacts are not considered to be so great as to represent a material impact requiring direct mitigation by CCC in isolation. We expect further direct dialogue with CCC, KCC and Jacobs in due course. For the A2 / A28 Wincheap Junction, the supporting technical work includes representation of the 4th slip, for which delivery is currently being discussed. This is addressed further below in specific comments relating to the South West Canterbury area and its proposed allocations. It is concluded that, with the benefit of the collated technical work which is presented as supporting information to the Regulation 19 consultation, it is clearly demonstrated that the strategic modelling indicates that the A2 corridor will come under additional pressures in scenario DS1 which are broadly addressed in scenario DS2, with further improvements in scenario DS3. The bus measures proposed in scenarios DS2 and DS3 will result in some redistribution of traffic between A2 junctions as traffic is intercepted away from the main City Centre and directed to Park and Ride facilities as an alternative. The assessments have demonstrated that the mitigation of local plan impacts in and around the A2 Wincheap interchange is likely to be necessary to mitigate severe impacts; the mitigation measures are currently expected to be required on the LRN in the vicinity of the junction rather than the A2 junction itself, but nonetheless these will be directly relevant to National Highways' interests.

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Part 3: Detailed Representations

NH006	Pages 20 and 21	Detailed Representation: Policy SS5	Policy SS5 presents the Movement and Transportation Strategy for the district. This policy specifies several of the requirements which will be needed to secure the modal shift strategies and assumptions which have fed into the detailed transport assessment work. The detail of this policy is considered to align with the measures and assumptions used in the technical work. However, it is noted that Policy SS5 does not make any direct reference to the monitoring of outcomes, or the use of a “monitor and manage” strategy; it is also the case that Policy SS6 (Infrastructure Strategy) does not include this element. It is recommended that, given the structure of the two policies, Policy SS5 should include reference to the use of monitor and manage to assist in the implementation and review of measures within the policy. It is also recommended that the principle of establishing a Transport Review Group (TRG) should be included in the policy, so that there is a direct link between SS5 and the aims and objectives of the Transport Strategy itself. This will also further strengthen the purpose and intent of policy SS7 (Local Plan Review). Therefore, clarity via minor modifications may assist LP users.
NH007	Page 24	Detailed Representation: Policy SS7	While not normally necessary, we wish to confirm our support for the need for and content (with regards transport matters) of Policy SS7 (Local Plan Review) that establishes the need for future reviews of the Local Plan to consider the outcomes of the delivery of the Transport Strategy (discussed below).

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			The failure of the transport strategy to deliver the desired modal shift changes is explicitly identified as a possible trigger for an earlier review of the Local Plan to take place. This emphasises the importance of the wider transport strategy and provides an additional incentive for the monitoring process to identify and address any early signs of under-delivery via new or revised transport measures.
NH008	Pages 45 to 61	Detailed Representation: South West Canterbury SDA (Policies C10, C11, C12, C13 and C14)	It is recognised that significant discussions are ongoing regarding the works to the SRN which are associated with the South Canterbury / Mountfield Park sites which are allocations within the current adopted Local Plan. There are several interdependencies between these works and the ability of the SRN in this location to facilitate proposed allocations within this emerging Local Plan. The modelling work undertaken to support the Regulation 19 plan incorporates the South Canterbury works in a manner consistent with the understanding of these at the time the modelling was required to be undertaken. It is our understanding that, whilst the precise form of the works may alter because of the ongoing discussions, there is no current intention to change the works to the extent that the capacity of the affected junction would compromise future delivery of the proposed allocations in the emerging plan. However, this will need to be kept under review as the current discussions progress toward resolution. Regulation 19 identifies the Southwest Canterbury Strategic Development Area, comprising Sites C10 to C14, which are located in close proximity to the existing South Canterbury allocations in the adopted Local Plan 2017 and the new A2 Wincheap slip road; as a result, the scale and location of this Strategic Development Area mean that the operation of the A2, and in particular the Wincheap junction, will be a key consideration in assessing transport impacts.

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			The new Southwest Canterbury allocations are expected to deliver approximately 2,115 homes, together with supporting infrastructure including a primary school, sports facilities, open space, and related community facilities. The allocations also identify the need for relevant and proportionate infrastructure contributions in accordance with Policy DS15, which is of note in the context of funding critical infrastructure required to support development, including where improvements may be required in relation to the A2 corridor. (Any such contributions will need to be collected by CCC as National Highways will not accept monetary contributions toward works which are required to address the impacts of Local Plan sites). The allocations are intended to be designed in a way that reduces reliance on the private car, including through lower-vehicle-speed environments, enhanced walking and cycling links, improved bus connectivity, and links to the city centre, Canterbury East railway station, and Wincheap. There is also reference to a proposed Park and Ride serving Nackington Road and Stone Street. While these sustainable transport measures are welcome, the cumulative scale of development in this location means there remains clear potential for additional pressure on the surrounding highway network, including the A2 and the Wincheap A2 junction. It has been agreed that, subsequent to the Regulation 19 consultation, microsimulation modelling of the A28 corridor will be undertaken in order to test the impacts of the proposed allocation sites in more detail. National Highways will continue to engage with this process as required.
NH09	Page 108	Detailed Representation: Policy C32	Although C32 is not directly identified as part of the South West Canterbury Master Plan, it is relevant to National Highways concerns because of its close proximity to the Wincheap junction and the A2, and its role within the wider Transport Strategy.

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			The expansion of the Park and Ride is a critical element in reducing traffic movements into the City Centre; its interaction with the new 4th slip will be assessed in greater detail as part of the microsimulation modelling work. The strategic modelling assessment has shown that the cumulative impacts of the consented and proposed developments in this area will have a material impact on traffic demand. The provision of the 4th slip in an appropriate form will be crucial to accommodating this demand; the microsimulation modelling will provide a more detailed assessment of potential knock-on effects on the local road network which could in turn impact on the main Wincheap junction itself. It is likely that some additional targeted measures on the LRN may be required to protect the functioning of the A28 and National Highways will need to be involved with the identification and development of these proposals due to their interactions with the SRN.
NH010	Pages 262 to 263	Detailed Representation: Policy DS15 (Infrastructure Delivery)	The policy requires developments to fund and phase critical infrastructure (transport, utilities, mitigation) with walking and cycling links delivered first (this may be before occupation). Where on-site solutions are impractical, off-site mitigation must be defined. Viability deviations are tightly controlled with independent 3-year reviews before completion to ensure compliance with policy. While we have no objection to the policy, for the avoidance of doubt, any works which are required to the SRN in order to facilitate Local Plan developments will need to be delivered by the LPA or a lead developer. The recently published Road Investment Strategy 3 (RIS3) heavily focuses on maintenance and renewal, and no reliance can be placed on RIS3 or any other funding from National Highways toward improvements needed for Local Plan sites. National Highways will enter into a Section 278 agreement to provide governance of any SRN works but will not

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			accept any monetary contributions or act as a “delivery partner” for SRN works. Therefore, clarity via minor modifications may assist LP users.
NH011	Pages 268 to 269	Detailed Representation: Policy DS18 (Highways and Parking)	The policy directly references Circular 01/2022 and states that the corresponding requirements must be considered for any schemes which are assessed by National Highways. It requires suitable TS/TA and Travel Plans demonstrating alignment with the movement hierarchy, maximising active/public transport mode share, reducing private car trips (especially single occupancy), and securing delivery/monitoring of mitigation and EV charging. Proposals are to be refused where they: • Do not appropriately reflect the movement hierarchy as set out in the Transport Strategy • Prejudice delivery of key infrastructure • Create unacceptable highway safety issues • Cause severe residual cumulative network impacts National Highways will expect to be consulted on all developments (whether allocated or otherwise) where sites lie near the SRN or would result in a material increase in traffic using the SRN. Early engagement should be undertaken if the need for National Highways involvement is unclear. Therefore, clarity via minor modifications may assist LP users.
NH012		Draft Transport Strategy	The Transport Strategy takes a Vision and Validate (compliant with circular) approach and commits to a “monitor and manage” regime, including roadside sensors to track multimodal volumes. The headline vision is that by 2042, sustainable modes will be greater than private car trips, underpinned by:

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			• Maximising sustainable/active travel access at strategic sites to reduce residual vehicular impacts • Strategic investment in active and sustainable travel for existing communities • Proportionate demand measures for trips into the city centre • Site-specific resilience measures secured through monitoring • Early rollout of monitoring tech and evidence-based reviews The strategy overview is presented via Table 6.1, which sets out the proposed elements of the strategy in the short, medium and long term for three discrete categories: sustainable transport, demand management and highway resilience. The short-, medium- and long-term periods correspond to years 1-5, 6-10 and 11-15 of the emerging Local Plan. It is noted that the expansion of the Wincheap Park and Ride, which is located in close proximity to the A2, together with the additional fourth slip arm at the A2 Wincheap junction, is phased within the short-term delivery period. Several elements of the transport strategy involve reallocating certain areas of road space for bus lanes (for example, a dual carriageway for private vehicles could be reduced to a single carriageway). The strategy also proposes point closures and bus gates in certain residential neighbourhoods. These proposals have been accounted for in the corresponding strategic modelling; the re-distribution in the strategic models as a result has identified any areas where traffic is potentially routing back to the SRN because of this reduced capacity and this has been accounted for in appraisal of the corresponding modelling outputs. The proposed monitoring of the transport strategy will include collection of traffic flow data via “fleet sensitive” cameras. Reference is not made to how information from major local plan site buildouts could be

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			incorporated. As referenced above, this section should be expanded to directly link the Transport Vision for the district to implementation via a Monitor and Manage approach. It is considered that some form of transport monitoring group will be required to oversee the implementation of transport strategy measures; this should be established in the final or updated version of the strategy. Therefore, clarity via minor modifications may assist LP users.

Concluding Comments

Thank you for consulting National Highways on the Canterbury Regulation 19 Local Plan.

We have provided representations. They include some aspects where we believe that further work is necessary per se and in some places may lead to required Main or Minor Modifications.

We commit to continuing to work proactively and pragmatically with the Council and others to complete the necessary work.

Once the Council has had the opportunity to consider all representations received, we would be pleased to meet with officers to review any SRN implications and agreed the way forward.

We look forward to continuing our constructive engagement with Canterbury, including the preparation of a Statement of Common Ground between both parties prior to the submission of the Plan, that can be updated as necessary thereafter.

In the meantime, if there are any immediate queries regarding our representations, please contact us via PlanningSE@nationalhighways.co.uk

Yours faithfully,



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