

# Regulation 19 Representation – Transport-Focused Objection

**Subject:** *Failure of the Sustainability Appraisal and Local Plan to Comply with NPPF 2024 Transport Requirements*

I am objecting to the Regulation 19 Draft Canterbury District Local Plan on the specific ground that the Sustainability Appraisal (SA) and the Plan itself **fail to comply with NPPF 2024 transport policy**, rendering the Plan **unsound** and **legally deficient**.

---

## 1. Non-Compliance with NPPF 2024 §120–129 (Transport and Movement)

NPPF 2024 requires Local Plans to:

- **reduce the need to travel**
- **prioritise active travel and public transport**
- **minimise car dependency**
- **locate development where sustainable modes can be maximised**
- **assess cumulative transport impacts**

The SA does not meet these requirements.

---

## 2. No Quantified Transport Assessment of Spatial Options

The SA Framework includes:

“13.1 Promote consistency with the sustainable transport hierarchy”

However, the SA provides **no quantified transport evidence** for any spatial option. It does not assess:

- trip generation
- vehicle kilometres travelled (VKT)
- peak-hour network stress
- junction capacity
- queueing impacts
- mode share
- carbon emissions from transport

- cumulative impacts on the A257, A28, A2, or rural lanes

This is a fundamental omission. Without quantified evidence, the SA cannot demonstrate that the preferred “Canterbury Focus” strategy performs better than alternatives such as:

- Coastal Focus
- Rural Focus
- New Settlement

This is a breach of NPPF §122 and SEA Regulation 12(3).

---

### 3. No Assessment of Real-World Network Constraints

NPPF §123 requires plans to consider **existing network conditions**, including congestion, safety, and capacity.

The SA does not assess:

- the fragility of the A257 corridor
- the cumulative impact of multiple large allocations feeding into the same constrained network
- the safety implications of increased traffic on substandard rural lanes
- the interaction between new development and existing bottlenecks
- the effect of additional traffic on air quality in AQMAs

The A257 is already highly sensitive to small increases in flow. The SA does not acknowledge or assess this.

---

### 4. No Evidence That the Spatial Strategy Reduces Car Dependency

NPPF §120 and §122 require development to be located where sustainable modes can be maximised.

The SA does not:

- compare accessibility by walking, cycling, and public transport across spatial options
- assess whether the Canterbury Focus strategy increases car dependency
- evaluate whether alternative strategies (e.g., Coastal Focus) offer better sustainable transport outcomes
- assess the viability or deliverability of proposed bus or cycling improvements

The SA simply assumes that sustainable transport will improve, without evidence.

This is contrary to NPPF §122(c), which requires **realistic and deliverable** transport solutions.

---

## 5. No Cumulative Transport Assessment

NPPF §129 requires cumulative impacts to be assessed.

The SA does not assess:

- combined impacts of multiple allocations on the A257
- interaction with South Canterbury, Sturry, Broad Oak, or other strategic sites
- cumulative effects of new Park & Ride proposals
- cumulative impacts on rural lanes such as Bekesbourne Lane

This is a breach of SEA Regulation 12(3) and the principles established in *Ashdown Forest* (2015), which require cumulative environmental effects to be assessed.

---

## 6. No Assessment of Transport-Related Carbon Emissions

NPPF §156–161 require plans to shape places that reduce greenhouse gas emissions.

Transport is the largest source of emissions in Kent.

The SA does not:

- quantify transport emissions
- compare emissions across spatial options
- assess whether the preferred strategy is the lowest-carbon option

This is a material failure.

---

## 7. The Plan Is Not “Justified”, “Effective”, or “Consistent with National Policy”

Because the SA fails to assess transport impacts properly, the Local Plan fails three of the four NPPF soundness tests:

## **Not Justified**

No evidence that the chosen spatial strategy minimises car dependency or performs better than alternatives.

## **Not Effective**

No evidence that the transport network can accommodate the proposed development.

## **Not Consistent with National Policy**

Fails NPPF §120–129 and §156–161.

---

# **8. Requested Remedy**

To comply with NPPF and SEA law, the Council must:

1. **Re-run the Sustainability Appraisal**, including:
  - quantified transport modelling for each spatial option
  - cumulative network assessment
  - accessibility analysis for walking, cycling, and public transport
  - carbon assessment of transport impacts
  - realistic evaluation of deliverability of transport interventions
2. **Re-publish the Local Plan** for consultation with a legally compliant SA.

Until this is done, the Plan cannot lawfully proceed to Examination.