



Canterbury Reg 19 Local Plan – Transport Reps

Land North of Hollow Lane, Canterbury

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1 Introduction

1.1 Background

- 1.1.1 C&A have been appointed by Pentland Homes Ltd. to provide transport and highways support for their site 'Land North of Hollow Lane' in regard to promotion activities associated with the emerging Canterbury City Council (CCC) Local Plan (2040).
- 1.1.2 In 2025 CCC carried out a Regulation 18 consultation on the Local Plan (2040) which included the neighbouring sites C6 'Merton Park' and C7 'Land North of Hollow Lane', both at that time being promoted by Quinn Estates as a combined sustainable urban extension to Canterbury. It had been anticipated that CCC would move latterly to Regulation 19 stage and as part of this, the promoter had been actively engaged with both CCC and Kent County Council (KCC) in the preparation of transport evidence to support those draft allocations.
- 1.1.3 However, in the summer of 2025, CCC instead reverted to Regulation 18 stage with a 'focused consultation' on a revised Local Plan strategy. This retained Merton Park, now referred to as Site C10, but removed the Land North of Hollow Lane site. This change in strategy is understood to have been informed by concerns raised by KCC Highways – in particular with respect to perceived concerns regarding residual traffic impact when considered alongside the draft Canterbury District Transport Strategy (CDTS).
- 1.1.4 In parallel, C&A had prepared two volumes of evidence: a Sustainable Travel Strategy and a Traffic Impact Assessment for the Land North of Hollow Lane, in anticipation of support of a Regulation 19 allocation. These were submitted as part of the Regulation 18 focused consultation in support of this site's reinstatement within the Local Plan strategy and are resubmitted now as part of representations on the Regulation 19 draft Local Plan with the same aim.
- 1.1.5 As originally proposed, the Land North of Hollow Lane site includes the potential for approximately 800 dwellings including affordable housing, community and commercial uses, as illustrated below. This site adjoins recently permitted development on the land immediately to the north and northwest, which forms Site 11 in the adopted Canterbury Local Plan.

Figure 1.1: Land North of Hollow Lane - Concept Masterplan



1.2 Report Purpose

- 1.2.1 This report is intended to support representations to the Regulation 19 draft Local Plan with respect to the Land North of Hollow Lane site. Specifically, it responds to the concerns raised by KCC Highways with respect to the site as follows:

Representations were submitted to the Focused Regulation 18 draft Local Plan consultation (2025) disputing the SLAA assessment, with additional evidence submitted in the form of a Sustainable Transport Strategy, Traffic Impact Assessment and updated masterplan. Evidence was reviewed and considered by council officers and KCC Highways.

KCC Highways have advised that there remain concerns regarding the impact on the highway network including the A28/A2 corridor west of Wincheap which already experiences peak-period congestion, as well as the impact on rural lanes in the wider area including Howfield Lane and Bigbury Road which are not engineered to carry additional development related traffic safely or comfortably.

The site would also rely on the internal road network of the adjoining Saxon Fields site (Policy CF1, Site 11), which was not designed to function as a major access route for further strategic scale residential development.

The site remains unsuitable for the development proposed due to concerns regarding highway impact and the ability to achieve suitable access. The site is not proposed as a draft allocation in the Regulation 19 draft Local Plan (2026).

1.2.2 This note seeks to address KCC’s concerns outlined above. In doing so the following report is structured to respond to each element in turn as follows:

1. Perceived traffic impact concerns on:
 - a. The A28/A2 corridor west of Wincheap; and
 - b. Rural lanes including Howfield Lane and Bigbury Lane.
2. Reliance on the internal road network of the adjoining Saxon Fields site.

2 Traffic Impact Concerns

2.1 A28 / A2 Corridor West of Wincheap

- 2.1.1 The comments from KCC infer that the technical evidence submitted Focused Regulation 18 draft Local Plan consultation has been fully reviewed and concerns still remain following this review. However, KCC have not provided specific comments with respect to adequacy of the assessment within the evidence or drawn any conclusions with specific reference to the findings of that assessment. It is therefore unclear as to how and why KCC Highways have come to this position.
- 2.1.2 The assessment forming part of the submitted evidence was based the upon strategic transport model forecast traffic flows on the surrounding network, derived from KCC’s own Kent Transport Model.
- 2.1.3 Initially a high-level comparison was made between a forecast baseline scenario representing a previous Local Plan growth strategy for the district, and a cumulative ‘with development’ scenario building upon the forecast baseline with traffic from the Land North of Hollow Lane and Merton Park sites in combination. Both modelled scenarios include committed highways infrastructure forming part of the proposed transport strategy supporting the emerging Local Plan, namely the fourth slip road at the A2/A28 junction, the Wincheap Gyratory scheme and the Cockering Farm spine road. As per the latest CDTs, the first two of these schemes are expected to be delivered by 2030 and would provide mitigation on the corridor.
- 2.1.4 The assessment, which robustly identifies the combined impact of both Land North of Hollow Lane and Merton Park together, indicates only a moderate ‘net’ impact of the combined developments on the A28 corridor west of Wincheap when compared with the forecast baseline scenario. Maximum one-way flow increases in the order of 50-70 vehicles on the A28 between Milton Manor Rd and the A2 represent a low % increase compared with both current and forecast levels of traffic.

- 2.1.5 Whilst it is acknowledged that there is some existing peak hour congestion on the A28 corridor, it is important to note that this does not automatically mean further traffic impact would be severe in the context of prevailing planning policy or that all further development should be precluded.
- 2.1.6 Furthermore, the CDTs identifies the reduction in city centre parking provision coupled with the expansion of Wincheap Park and Ride. In combination with the fourth slip road scheme above, this can be expected to intercept more vehicle trips from the A28 corridor than current position.
- 2.1.7 More detailed assessment of the A28 was then undertaken using a VISSIM microsimulation model developed for the corridor. The VISSIM model assessment, based upon forecast traffic demand from the strategic transport model, and incorporating greater detail in terms of the network operation provides more specific operational metrics such as journey times through the network. The detailed modelling outputs are summarised in report 22-022-RPT-016 Rev B submitted alongside this report.
- 2.1.8 Peak hour journey time outputs from the A28 VISSIM model on key validated routes indicate minimal increases in journey times through the network of less than one minute on any route. This level of delay is not considered to be severe in the context of the NPPF para 116.
- 2.1.9 Recent case law from a planning appeal at Land North of Possingham Farm in Ashford helpfully provides some parameters, in the view of the planning inspector, of what constitutes a severe highway impact in the context of the NPPF. The inspector in that case highlighted that:
- ‘Severe’ is the highest test in the Framework and matters of driver inconvenience caused by increases in queuing and delay are unlikely in themselves to constitute severe impacts unless they are ‘very great’¹⁶ and can be attributed solely to the appeal scheme.*
- 2.1.10 With specific respect to journey time impacts, the inspector concluded the following:
- KCC set out two thresholds of severity, these being a 5% increase in the Ratio of Flow to Capacity (RFC) or a 60 second increase in delay. At the outset, I will say that those thresholds are a very long way from my own interpretation of a ‘very great’ or ‘severe’ impact.*
- 2.1.11 On the basis of the modelled journey time impacts on the A28 corridor and in the context of the Inspector’s comments in the nearby Possingham Farm appeal case, it is reiterated that the traffic impacts of the Land North of Hollow Lane site would be moderate and cannot be considered severe in the context of the NPPF.

2.2 Rural Lanes

- 2.2.1 The strategic modelling assessment indicates that there would also be a moderate impact on the rural lanes surrounding Chartham Hatch, specifically Howfield Lane and Bigbury Road. When compared with the forecast baseline, these routes are forecast to observe increases in flow in the order of 45 vehicles in the AM peak period. In the PM peak period, the impact on Bigbury Lane is forecast to increase by only 19 vehicles, whilst on Howfield Lane this increases to 68 two-way movements.
- 2.2.2 It is reiterated that this represents the cumulative impact of sites C6 (now C10) and (former) C7 in combination and therefore represents a robust assessment. Notwithstanding this, the forecast level of impact would be minor and would not automatically give rise to significant congestion and delay on these routes. Furthermore, and as outlined in the previously submitted evidence, there would be potential to investigate the introduction of traffic calming measures on these routes to deter motorists from using them as an alternative to the A2 and A28 corridors.
- 2.2.3 It should be noted that the above assessment, whilst including key infrastructure such as the fourth slip at the A2/A28 Wincheap junction, it does not include other measures within the CDTs that would further mitigate the A28 corridor.
- 2.2.4 As such, it cannot be considered on the basis of the evidence provided that the development would have a severe traffic impact on these rural lanes in the context of the NPPF para 116.

3 Reliance on Access from Adjacent Development

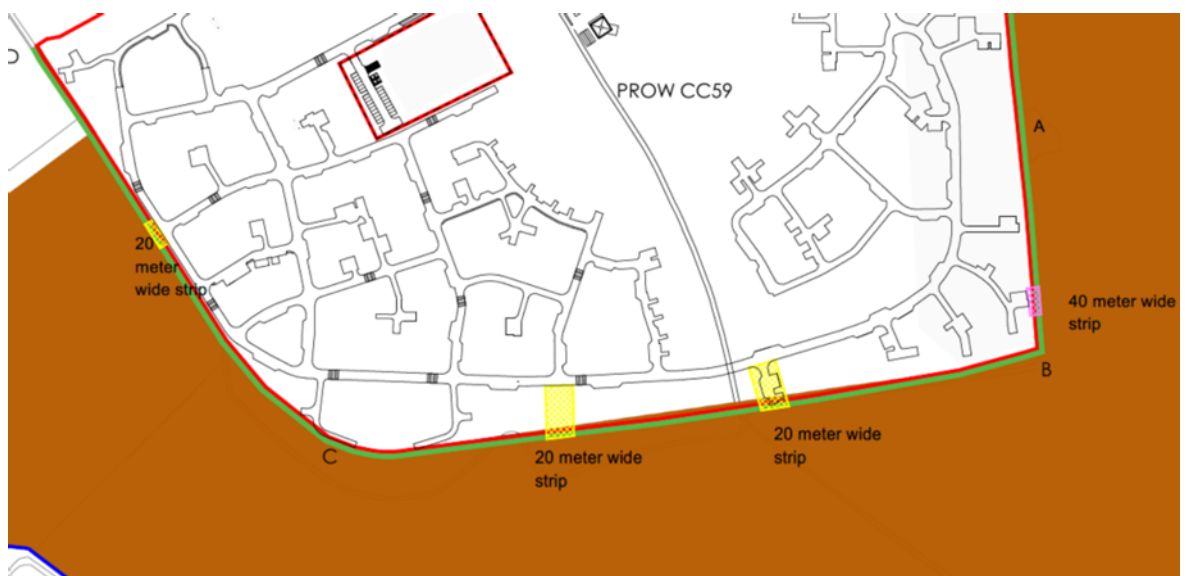
- 3.1.1 The proposed access strategy for the Land North of Hollow Lane site would utilise the consented and safeguarded access routes through the adjacent Saxon Fields development site. An indicative masterplan showing the proposed access routes to/from the adjoining consented development is shown in the figure below:

Figure 3.1: Proposed Access Routes



- 3.1.2 The estate roads within the adjacent development were designed to a 'Local Distributor Road' standard in accordance with the Kent Design Guide (KDG) with a carriageway width of 6.75m. This standard of road is intended to facilitate high volumes of traffic in addition to enabling bus services to route via these roads if appropriate.
- 3.1.3 Furthermore, these roads are obligated to be delivered to the same standard of design within Phases 2 and 3 of the Saxon Fields site. The housebuilder BDW is contractually bound to provide connections at 6.75m wide within reserved matters applications for these phases, ensuring that continuous provision of local distributor standard of road is provided between the Land North of Hollow Lane site and the wider network via Saxon Fields. The locations of these obligated connections are shown in the figure below:

Figure 3.2: Obligated 6.75m Wide Connection Points



- 3.1.4 The KDG outlines certain design parameters suitable for a Local Distributor Road as follows:

Local Distributor Road

- 1 a busy road linking other distributor roads and residential access roads, distributing traffic within the primary residential districts of a town
- 2 a road type applicable to all sites on the outskirts of main towns or infill sites within existing suburban areas
- 3 generally serves over 300 dwellings
- 4 provides an opportunity for boulevard or avenue planting and cycleways.
- 5 for new developments, direct vehicular access to dwellings would not normally be provided, the exception being shared private drives with turning within the site

- 3.1.5 On the basis of KCC's own design guidance, it is considered that the proposed access strategy to the site, formed of multiple Local Distributor Roads connecting the site to the A2, A28 and the wider highway network to be completely appropriate and in accordance with the parameters set out above. Further supporting evidence would be provided in a Transport Assessment at application stage.

4 Conclusion

- 4.1.1 In conclusion, it is considered that all of the matters of concern raised by KCC Highways with respect to the site are not substantiated by the evidence submitted. KCC Highways have also not presented any alternative evidence to support their position with respect to the site.
- 4.1.2 On the basis of the evidence submitted to date, and clarified within this note, the site can demonstrate safe and suitable access in accordance with the NPPF para 115 and would not lead to a severe transport impact in the context of para 116 of the framework. As such, there are no sound highways or transportation grounds why the Land North of Hollow Lane site should not be reinstated as a residential allocation within the emerging Local Plan.