



Da Vinci House
44 Saffron Hill
London EC1N 8FH
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

Planning Policy Team
Canterbury City Council
14 Rose Lane
Canterbury
CT1 2UR

18th May 2026

JW/OR/I002082
BY EMAIL

Dear Sir/Madam,

REPRESENTATION TO THE CANTERBURY DISTRICT LOCAL PLAN REGULATION 19 IN RESPECT OF LAND NORTH OF HOLLOW LANE, CANTERBURY (FORMER ALLOCATION POLICY C7)

Iceni Projects, on behalf of Pentland Properties Ltd, welcomes the opportunity to submit representations to the Canterbury District Local Plan (Regulation 19 Consultation).

Pentland Properties strongly encourages the re-instatement of Land North of Hollow Lane as an allocation within the emerging Local Plan, formerly allocated as Policy C7 within the Revised Draft Regulation 18 Local Plan consultation (2024) and the Regulation 18 draft Local Plan (2022). Representations were made during the previous Focused Regulation 18 Consultation (2025). The information submitted as part of these previous representations should be read in conjunction with this submission, which further advocates for the inclusion of the site as part of the draft allocation.

There are significant sustainability benefits to Land North of Hollow Lane being included within the wider South West Canterbury Strategic Development Area (SWC SDA) to deliver a wider residential-led mixed-use development. This includes the provision of a number of enhanced social, economic and environmental benefits through a well-planned comprehensive approach. The re-inclusion of the former Policy C7 site alongside Merton Park (Policy C10), in addition to new development coming forward at Cockering Road will enhance this strategic development area.

The Council's evidence base at the Focused Regulation 18 Consultation Stage indicated that the site had been removed due to concerns over the access to the site. Representations were submitted that addressed that issue and confirmed definitively that an appropriate access strategy exists. The 2026 SLAA accompanying the current Regulation 19 Consultation advises that concerns remain from KCC Highways in relation to highways impact and the access, however no evidence-based reasoning has been provided for this. Pentland Properties has concerns that Canterbury and KCC Highways have not properly engaged with the evidence presented to them.

Appended to this document at Appendix A is a Transport Representation prepared by C&A:

- **Appendix A - Canterbury Reg 19 Local Plan – Transport Representations** (ref: 25-119-RPT-001 Rev A) prepared by C&A;

The following documents have also been submitted separately, which were previously submitted with the previous representations:

- **Canterbury Local Plan Evidence Vol 1 – Sustainable Transport Strategy** (ref: 22-022-015 Rev C) prepared by C&A; and

- Canterbury Local Plan Evidence Vol 2 – Traffic Impact Assessment (ref: 22-022-016 Rev B) prepared by C&A.

Pentland Properties is willing to positively engage with the Council and KCC Highways to demonstrate the site's deliverability, and will support the Council to provide the necessary evidence base in order to identify the site as suitable for housing growth. Pentland Properties would particularly welcome the opportunity to further engage in respect of the access proposals, as these are noted as the reason for the site not being allocated, however evidence has been presented to the Council and KCC Highways in respect of the concerns raised.

While it is recognised that this is now the submission version of the Local Plan, Pentland Properties hopes that these comments are provided to the Inspector and can be addressed through the EiP, to support the delivery of housing and assist in meeting the Council's needs. Pentland Properties, as site promoter, wishes to attend any Local Plan examination hearings that are of relevance to the omission sites and spatial strategy matters.

a. Housing Need and Plan Period

Pentland Properties continues to support the provision of Canterbury as the main focus for growth.

Pentland Properties notes that the Local Plan provides 25,407 homes over the plan period including all housing land supply components, against a need for 23,085 dwellings, providing a margin of 10%. Pentland Properties supports the Council in this regard in that it meets their needs in full, noting the latest affordability ratios. This accords with NPPF paragraph 62.

With that in mind however, the Council should ensure that they are satisfied that sites identified to meet this need are deliverable and developable. While we support the 10% buffer proposed by Canterbury, there are a number of sites that Pentland Properties have reservations in respect of their deliverability.

Pentland Properties highlights that local housing need targets are a minimum (Paragraph 62 - NPPF), and Canterbury can and should ensure there is suitable flexibility in their supply to meet this, particularly where there is uncertainty over the deliverability of some of their draft allocated sites. Where it is possible for the Council to identify additional land in sustainable locations, this should be supported. Similarly, noting Canterbury's underperformance in respect of delivery in recent years (most recently 67% in the 2023 Housing Delivery Test), the Council should identify sites that have been demonstrated to be deliverable, such as this site here to deliver housing. Therefore, Pentland Properties strongly advises planning for a buffer of 20% against the local housing need, consistent with the objectives of Paragraph 78 of the NPPF, to ensure that the Council can be comfortable in ensuring their housing supply is deliverable over the plan period and respond to previous under delivery.

It is important to highlight that Land North of Hollow Lane accords with the spatial strategy that seeks to focus new development in sustainable locations close to the city. In this context, the site should be supported to come forward in preference to less sustainable alternatives or those adjoining settlements lower in the settlement hierarchy. Given the access issues that are addressed through this representation, the Council should reconsider the allocation of the site as an appropriate extension of Canterbury that aligns with the strategic principles set out within the draft Local Plan. The Council should ensure that they are satisfied that sites identified to meet their need are deliverable and developable, and Pentland Properties wishes to continue engagement with the Council to evidence this in accordance with NPPF Paragraph 36.

Pentland Properties support the plan period up to 2042/43 and consider it to be in accordance with the minimum 15-year period as required by the NPPF (Paragraph 22), with an expected adoption of Winter 2027. Given previous delays with the Local Plan process, we would expect this to be updated in the event of any further delay to the Local Plan process. Given current adoption timescales following the submission of Local Plans for examination (typically 18-24 months), we would recommend that the Council gives consideration now to the possibility of the plan period being extended by a further year.

b. The site & South West Canterbury Strategic Development Area

The SWC SDA was updated in the Focused Regulation Consultation to remove Land North of Hollow Lane (former Policy C7) as an allocation, and this has been continued in this Regulation 19 Consultation. The SWC SDA offers the most logical area of wider growth to Canterbury and provides a more comprehensive benefit when Land North of Hollow Lane is included, offering a clear opportunity to deliver a genuinely sustainable extension to Canterbury.

During the Revised Regulation 18 consultation, the logic of promoting the SWC SDA is clear – *“The strategy for Canterbury is to consolidate growth on the southern side of the city, to integrate with planned growth at the 2017 strategic sites at South Canterbury and Cockerling Farm.”* The current Regulation 19 consultation continues this position – *“The South West Canterbury SDA is set in a highly sustainable and accessible location and consolidates the planned growth identified in the Canterbury District Local Plan (2017).”*

The site is currently allocated for development within the adopted Local Plan (2017) as part of the Cockerling Farm allocation (SP3 Site 11), albeit the site was not brought forward as part of the Cockerling Farm outline planning application (CA/17/00519). As a starting point, this in itself is a strong reason for its continued inclusion within the Local Plan, given it has been considered at examination previously and found to be a sound location for housing. Similarly, the site still remains as a clearly suitable location and accords with the spatial strategy principles set out within the draft Local Plan.

Spatial strategies must be informed throughout their preparation by a sustainability appraisal (Paragraph 33 - NPPF) and the 2026 Sustainability Appraisal reaffirms that Canterbury is the most suitable location for the principal focus of development in the district. Canterbury remaining as the focus for development is consistent with the previous and current draft Local Plans, and the SWC SDA accords with this strategy, therefore confirming that where this representation demonstrates that Land North of Hollow Lane continues to be deliverable, it should be reinstated as an allocation to align with these findings, and ultimately support the overall intention to deliver sustainable development in line with NPPF paragraph 11. The ability to provide clear sustainable connection links in area of existing growth provides genuine opportunity to deliver a mode shift at significant scale. The removal of Land North of Hollow Lane is considered to be a missed opportunity by the Council, given that it can help consolidate growth and build on existing and emerging investment for growth and infrastructure delivery in this location. It is also unclear whether the replacement allocations would deliver comparable benefits to those achievable through the South West Canterbury SDA.

The land identified under Policy C10 (Merton Park) & former Policy C7 is being brought forward by two local established housebuilders, both renowned for delivering high quality developments. It can be expected that the high development standards associated with both groups will deliver an attractive extension to the city, both in visual terms, but also for future residents to live. Pentland Properties continues to work alongside Quinn Estates in regard to Merton Park and maintains a good working relationship such that delivery of the SDA can be provided in a co-ordinated and timely manner. It is noted as a key objective of the SWC SDA that site developers will be expected to work collaboratively to ensure the SDA is delivered in a coordinated manner, which these two sites will undertake.

c. Re-allocation of Land North of Hollow Lane

The justification for the dropping of the site is not considered to be evidence-based.

The Development Strategy Topic Paper (March 2026) provides the following reasoning:

“SLAA259 Land to the North of Hollow Lane was previously considered suitable in the SLAA (2022). The site comprises of land within the adopted 2017 Local Plan allocation at Cockerling Farm (Site 11 Policy SP3), the allocated development quantum of which has been granted planning permission within a smaller area.

The site was included as part of the South West Canterbury strategic development area in the Regulation 18 draft Local Plan (2022) and Regulation 18 draft Local Plan (2024) for further residential development. The draft allocation relied on access via the proposed South West

Canterbury link road which would have connected the site to the A28 through 36 the adopted Cockering Farm allocation (Site 11, Policy SP3), and to the adjacent proposed Merton Park (SLAA151) draft allocation through the widening of the A2 underpass on Hollow Lane, with onwards connection to the proposed A2 slip roads within the Merton Park site. As discussed above, an alternative access strategy is now proposed for Merton Park which does not include the A2 slip roads and South West Canterbury link road. The site promoter has been unable to demonstrate an alternative suitable access strategy. The site is considered unsuitable in the SLAA (2026) due to concerns regarding access and highway impact and is not proposed for allocation. The Canterbury Urban Boundary and Site 11 Policy CF1 boundary have been amended accordingly, see Chapter 6 for details.”

Further to this, the SLAA (2026) states¹:

“...Representations were submitted to the Focused Regulation 18 draft Local Plan consultation (2025) disputing the SLAA assessment [2025], 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).”

Transport

The conclusions reached by the Council in the SLAA (2026) appear to rely on high-level concerns regarding access and highway impact, rather than a full consideration of the detailed evidence that has been submitted. A comprehensive suite of transport evidence, prepared by C&A, accompanies these representations and directly responds to the issues identified.

This includes a resubmitted Sustainable Transport Strategy (Volume 1), which sets out a clear vision for how travel to and from the site can be managed in a sustainable manner. The strategy reflects current national policy and aligns with the wider approach taken across the South West Canterbury SDA, including at Merton Park. It identifies a range of measures to encourage sustainable travel behaviour and reduce reliance on private car use. In addition, a resubmitted Traffic Impact Assessment (Volume 2) has been prepared, which assesses the cumulative effects of development at Land North of Hollow Lane alongside Merton Park. This assessment has been undertaken against a realistic baseline scenario and explicitly considers a transport strategy which excludes the previously proposed strategic link road and A2 slip roads. The results demonstrate that, in this context, the residual impacts on the highway network would not be severe.

A further detailed response to the Council's Regulation 19 position is provided within the accompanying technical note (ref: 25-119-RPT-001 Rev A). All three documents should be read in full.

It is noted in the SLAA (2026) Appendix B, that the Council conclude that the site is not suitable as *“there are concerns regarding highway impact and the ability to achieve suitable access”*. The same SLAA table states the following in respect of highways impact and access, which are responded to in turn:

¹ Most relevant extract for brevity – SLAA 2026 includes earlier context of allocation timeline.

Table 1: SLAA (2026) Appendix B – Site Assessments (SLAA259)

SLAA Column	SLAA Answer	Pentland Properties comment
Can you access the site (input from Highways)	<i>Site forms part of a current Strategic allocation for housing (Cockering Farm, Site 11). Access to the site is only achievable via the Cockering Farm strategic allocation. Further evidence is needed to demonstrate the suitability of access through the existing allocation.</i>	A suitable access <u>is</u> achievable. Evidence has been provided and appended to these representations that demonstrates that the access is achievable and therefore that the site can be considered as deliverable. 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. The estate roads within Saxon Fields 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. 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.
Is there Highway Capacity constraints? provide details (input from Highways)	<i>Highway capacity constraints have been identified at the A28 and the A28/A2 junction. A Transport Assessment is required to determine impacts on the highway network and demonstrate mitigation measures are achievable and deliverable.</i>	The supporting transport documents should be referred to, but it is clear that traffic impacts on the surrounding road network cannot be considered severe in the context of the NPPF. Whilst it is acknowledged that there is some existing peak hour congestion on the A28 corridor, it is important to recognise 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. It is noted that it is expected a Transport Assessment would be required, and this would be provided at an application stage.

Accordingly, the evidence demonstrates that the site is both accessible and capable of being delivered without giving rise to unacceptable highway impacts. The additional access work submitted as part of this representation demonstrates, beyond doubt, an alternative access strategy that does not rely on the link road, and relying on the internal network of Saxon Fields is appropriate. Similarly, the evidence demonstrates in respect of highways impact that in the context of the wider transport strategy, the

impact is acceptable. The Council's current position is therefore not supported by the available technical evidence.

It is then important to recognise that the proposal offers a number of key benefits, including the consolidation of planned growth associated with Cockering Road and Merton Park in the SWC SDA, thereby supporting a coordinated and comprehensive approach to development in this part of Canterbury. The site represents a highly sustainable location, being well related to Canterbury and its range of shops, services, and transport connections. This aligns with the Council's preferred spatial strategy, which seeks to focus new development in sustainable locations close to the city. In this context, the site should be supported to come forward in preference to less sustainable alternatives or those adjoining settlements lower in the settlement hierarchy.

As highlighted in earlier representations, the East Canterbury SDA, previously dropped from the draft Local Plan and now reallocated, was initially dropped on the basis of its transport strategy. In the intervening period it is clear that further consultation and engagement has been undertaken, resulting in an amended access strategy which has proved decisive for the Council to reallocate the scheme. Pentland Properties were not afforded the same opportunities by the Council as these other proposed sites, to the direct detriment of this site's allocation. It is noted that the East Canterbury SDA requires extensive infrastructure delivery, not least including a new link road with segregated cycle corridor connecting the A257 to South Canterbury (Site 1, Policy CF1) with onward connectivity to the A2 at Bridge. Noting the strategic importance of East Canterbury SDA to the plan, the Council will need to ensure the viability of the scheme and appropriately phased infrastructure triggers.

d. Summary and Conclusions

Pentland Properties disagrees in the strongest possible terms with the exclusion of former Policy C7 from the SDA, and argues that it should be reintroduced to deliver additional benefits to the South West Canterbury SDA, following the submission of the appended transport evidence which demonstrates the site is deliverable. The site's sustainability is emphasised in tandem with the wider SWC SDA and accordance with the principles of the spatial strategy set out in the draft Local Plan.

It is unfortunate that detailed engagement with KCC Highways on the above points has not been possible. Pentland Properties continues to seek the opportunity to engage with Canterbury and KCC Highways in respect of the access proposals and highways impacts, and are willing to work with the relevant bodies to engage on the updated evidence to support an allocation at the site.

Should the Council wish to discuss any or all of the issues raised in these representations, please do not hesitate to contact me.

Yours sincerely,



Oliver Ricketts
Senior Planner

APPENDIX A



Canterbury Reg 19 Local Plan – Transport Reps

Land North of Hollow Lane, Canterbury

25-119-RPT-001 Rev A

May 2026



Charles & Associates

Document Control Sheet

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C&A Consulting Engineers

Park House, Park Farm
 East Malling Trust Estate
 Bradbourne Lane
 Aylesford, Kent
 ME20 6SN
 Tel: 01732 448120

Landmark House
 Station Road
 Hook
 Hampshire
 RG27 9HA
 Tel: 01256 630420

enquiries@c-a.uk.com



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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

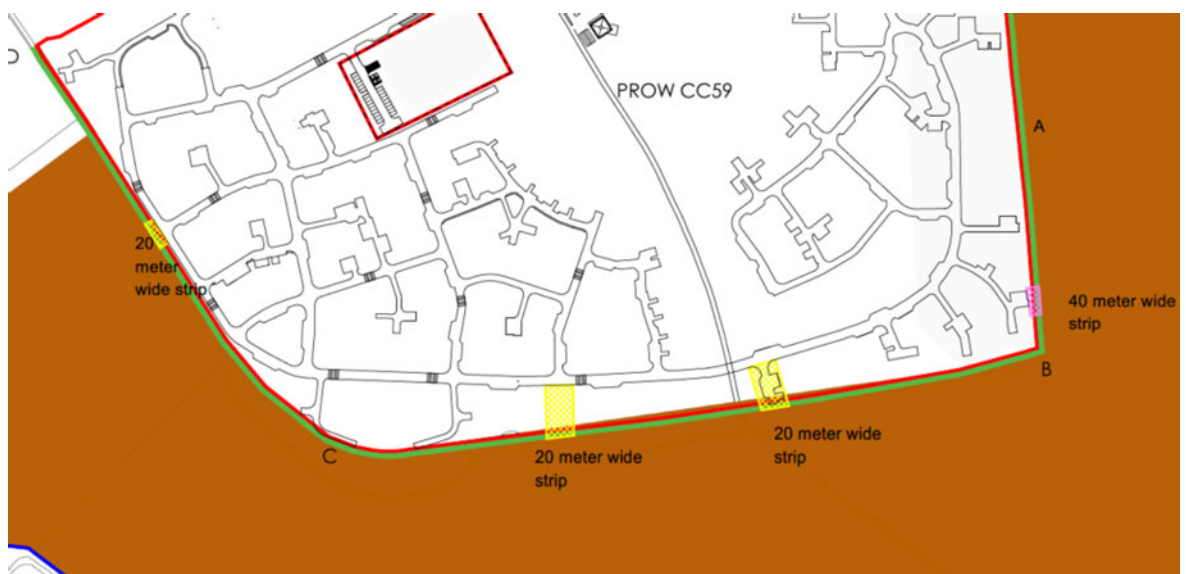
- 3.1.1 The proposed access strategy for the Land North of Hollow Lane site would utilise the consented and safeguarded access routes through the adjacent Saxon Fields development site. An indicative masterplan showing the proposed access routes to/from the adjoining consented development is shown in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