



University of Kent **Sites BCD**

Response to Regulation 19 Local Plan – Transport

May 2026

UK-70080896



Document distribution

University of Kent

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Prepared for

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Revisions

Rev	Date	Details
1	11-05-2026	Draft Issue for Client Comment
2	14-05-2026	Update following Client Comments
3	15-05-2026	Updated
4	15-05-2026	Updated

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Executive summary

WSP has been commissioned by the University of Kent (UoK) to provide transport advice for the development of proposals to the north of their Canterbury Campus known as Sites BCD. This report has been prepared to respond to the Canterbury City Council (CCC) Draft Canterbury District Local Plan: Regulation 19 Consultation reviewing the transport and highways related documents submitted.

Policy Document Review

The following details a summary of the findings made by WSP in their review of the transport policy documents:

- Policy SS5 of the Draft Canterbury District Local Plan sets out a 'vision and validate' approach to the Transport Strategy. Whilst welcomed, no fall back measures appear to have been developed to achieve the objectives of the Transport Strategy if the interventions proposed do not achieve the modal shift assumptions set out.
- To achieve the objectives of the Transport Strategy Policy SS5 outlines a series of key infrastructure requirements. It is unclear who will be responsible for delivery of these measures presenting risk that they are not delivered.
- The modelling undertaken to support the Transport Strategy identifies a series of issues which have not yet been addressed through the supporting evidence presented. Without consideration of these issues Policy SS5 cannot be considered to be sound.
- Some of the measures proposed in the Transport Strategy do not appear to have been modelled and therefore the results of the modelling do not fully support the objectives of Policy SS5.
- The Bus Action Plan does not demonstrate that the proposed measures will deliver the stated mode share increases and volume of bus patronage, against the current trends and issues for the bus sector. The mode shift assumptions therefore presented in the Draft Canterbury Transport Strategy do not appear to be supported by a robust evidence base.

Transport Document Review

The following represents a summary of the findings made by WSP in their review of the transport evidence base:

- The pattern of growth (concentrating development in the southeast of Canterbury) results in significant levels of congestion on the A257, A28 and city centre ring road in the Do Something scenarios. Traffic is noted in the modelling to be rerouting onto minor roads to avoid this congestion (concentrated on the city centre ring road) to access the A28 (both north and south of Canterbury). The level of re-routing is significant and unlikely to be able to be accommodated based on the existing condition of these links.
- The amount of traffic travelling between the A257 Littlebourne Road and the A28 Sturry Hill (using Stodmarsh Road, Moat Lane and through Fordwich) is forecast to be over 1,000 two-way vehicular trips in both peak hours. It is unlikely that these roads could accommodate this amount of traffic growth especially through the Village of Fordwich without significant improvement.
- The model appears to allow these volumes of traffic by overestimating the capacity of these rural links. This has the result of drawing traffic away from the A257, A28 and city centre ring road where traffic would be more appropriately concentrated. Congestion on

key links within the city such as the A257, A28 and city centre ring road are therefore likely underestimated.

- The Canterbury Transport Model (CTM) anticipates that there will be over 5,000 two-way vehicular trips in the AM and PM peaks to and from the north/ northeast Kent Coast. This brings into question the spatial pattern of growth proposed in the Local Plan. By concentrating development in the southeast of the city, vehicular trips have to travel through the City Centre to/from the north/northeast Kent Coast. If the distribution of trips in the model is correct (which WSP question) then the growth locations have been incorrectly allocated based on the constraints of the existing highway network and no infrastructure appears to be proposed to address this.
- The strategic development site at Brooklands Farm, Whitstable (Policy W4) will provide new eastbound on and off-slips to/from the A299. The CTM forecasts that the new development alongside the infrastructure of the new slip roads significantly increases the traffic flow on Radfall Road/ Hackington Road. KCC Highways have been clear as part of scoping discussions for the UoK's proposed site allocation (Sites BCD) that increased traffic levels on the rural roads to the north such as Radfall Road and Hackington Road would be unacceptable. It is therefore concluded that the impacts arising from the Brooklands Farm site are also unacceptable and need to be addressed before the Local Plan can be deemed to be sound.
- Owing to the significant issues highlighted above the transport evidence submitted to support the local plan demonstrates that both the pattern of growth proposed is inappropriate for the origins and destinations which the CTM suggests people will want to travel to/from and the modelling shows unacceptable impacts on rural roads which KCC have confirmed in discussions relating to the UoK's site allocation are unacceptable.

Strategic Land Availability Assessment Review

The following provides a summary of the key findings of WSP's review of the site assessment for the UoK's proposed site allocation (Sites BCD):

- The promoter team do not agree with the KCC Highways position that the Harbledown slip roads are necessary to develop Sites BCD. The conclusions reached in the SLAA that the site is not suitable on this basis are therefore unsound.
- The modelling undertaken to date using the CTM has not demonstrated that there is a reliance on the A2 Harbledown slips to deliver Sites BCD. A package of highway mitigation has been proposed to accommodate the development on the highway network. In combination with the Vision-led Transport Strategy put forwards for Sites BCD the impacts of the development on the highway network are not considered to be severe.
- The scale of the development requires primary education provision and therefore the cost of re-development of the existing Blean Primary School is not entirely a result of the access strategy. The conclusion that the development would be unviable as a result of the requirement to re-provide the Blean Primary School is therefore unsound.
- Whilst it is acknowledged that there are matters still to be resolved with KCC Highways to agree the Transport Strategy for Sites BCD these are not considered significant enough to prevent a recommendation for allocation of the site
- The modelling undertaken to date does not rely on the mode shift assumptions set out in the Transport Strategy for Sites BCD and therefore no reliance should be placed on this in determining the suitability of the site within the SLAA. The conclusion reached that the site is unsuitable on the basis of high mode shift assumptions is therefore unsound.

1. Introduction

1.1 Overview

- 1.1.1 WSP has been commissioned by the University of Kent (UoK) to provide transport advice for the development of proposals to the north of their Canterbury Campus known as Sites BCD. This report has been prepared to respond to the Canterbury City Council (CCC) Draft Canterbury District Local Plan: Regulation 19 Consultation reviewing the transport and highways related documents submitted.
- 1.1.2 Key documents reviewed include:
- Draft Canterbury District Local Plan (2042/43) (March 2026)
 - Canterbury Transport Modelling Forecast Report (February 2026)
 - Draft Canterbury District Transport Strategy (2026)
 - Canterbury District Bus Action Plan (February 2026)
 - Strategic Land Availability Assessment
 - Representations made by other site promoters for key growth locations within the District

1.2 Background

- 1.2.1 The UoK have been promoting land to the north of the University's Campus within the Canterbury Local Plan process since **2020**. During this time extensive discussions have been held with CCC as local planning authority, Kent County Council (KCC) as local highway authority and National Highways (NH) as strategic highway authority.
- 1.2.2 A number of documents have been produced in support of the site within the Local Plan process which have included assessment of the transport impacts of the proposed site allocation in the context of the Local Plan. The most recent key documents produced include:
- University of Kent, Disposal Sites – BCD – Highway Assessment – WSP August 2025
 - University of Kent, Sites BCD – Transport Strategy – WSP December 2025
 - University of Kent – Sites BCD – Transport Position Statement – WSP April 2026
- 1.2.3 These reports document the most recent analysis and position reached with KCC in respect to the transport strategy and package of transport mitigation proposed to deliver the Site in the context of the Local Plan.
- 1.2.4 The Transport Position Statement identifies the current status of discussions and further work discussed and agreed with KCC as being necessary to further develop the proposals. These documents have been used to inform the WSP review of the transport evidence base that supports the Local Plan.

1.3 Report Structure

1.3.1 Following this introduction, the remainder of this report is structured as follows:

- Chapter 2 reviews the Transport Policy documents;
- Chapter 3 reviews the main transport evidence based produced to support the Draft Canterbury District Local: Regulation 19; and
- Chapter 4 reviews the Strategic Land Availability Assessment.

2. Transport Policy Document Review

2.1 Introduction

2.1.1 This chapter reviews the latest policy documents to support the Draft Canterbury District Local Plan: Regulation 19 Consultation. The following documents have been reviewed:

- Draft Canterbury District Local Plan (2042/43) (March 2026)
- Draft Canterbury District Transport Strategy (2026)
- Canterbury District Bus Action Plan (February 2026)

2.2 Summary of Findings

2.2.1 The following represents a summary of the findings made by WSP in their review of the policy documents:

- Policy SS5 of the Draft Canterbury District Local Plan sets out a 'vision and validate' approach to the Transport Strategy. Whilst welcomed, no fall back measures appear to have been developed to achieve the objectives of the Transport Strategy if the interventions proposed do not achieve the modal shift assumptions set out.
- To achieve the objectives of the Transport Strategy Policy SS5 outlines a series of key infrastructure requirements. It is unclear who will be responsible for delivery of these measures presenting risk that they are not delivered.
- The modelling undertaken to support the Transport Strategy identifies a series of issues which have not yet been addressed through the supporting evidence presented. Without consideration of these issues Policy SS5 cannot be considered to be sound.
- Some of the measures proposed in the Transport Strategy do not appear to have been modelled and therefore the results of the modelling do not fully support the objectives of Policy SS5.
- The Bus Action Plan does not demonstrate that the proposed measures will deliver the stated mode share increases and volume of bus patronage, against the current trends and issues for the bus sector. The mode shift assumptions therefore presented in the Draft Canterbury Transport Strategy do not appear to be supported by a robust evidence base.

2.3 Draft Canterbury District Local Plan (2042/43)

2.3.1 The Draft Canterbury District Local Plan 2042/43 (March 2026) provides an update to the Canterbury District Local Plan (2017) which established a strategy for growth to 2031.

2.3.2 The aim of the plan is to provide a framework for delivering growth to meet development needs through providing high-quality, sustainable communities and economic development.

- 2.3.3 From a transport perspective the Local Plan focuses growth within the existing urban areas with a focus on Canterbury as this offers the greatest opportunity for sustainable travel. This approach is supported, as concentrating growth within existing settlements enables sustainable development that benefits both the new and existing population and aligns with the National Planning Policy Framework¹ which promotes growth in locations which are or can be made sustainable.
- 2.3.4 Supporting the Local Plan is a dedicated Transport Strategy which provides a package of measures to promote sustainable travel and facilitate the growth outlined within the Local Plan. This adopts a 'Vision and Validate' approach whereby the success of the interventions will be monitored and additional measures employed or brought forwards if necessary, secured through the framework set out in Policy SS7. Whilst this approach is welcomed and supported the success of such a policy requires the 'fall back' measures to be fully developed and funding identified to ensure that the strategy can be fully implemented. Policy SS5 sets out a package of infrastructure measures to achieve the objectives of the Transport Strategy but does not currently identify what additional measures would be employed should the measures proposed not result in the modal shift required. On this basis the current Policy SS5 is unsound.
- 2.3.5 Policy SS5 sets out a series of key infrastructure requirements to achieve the Transport Strategy. However, it is unclear who is responsible for the key infrastructure requirements and how the funding will be secured. If the infrastructure requirements fall to the individual strategic growth locations to deliver, WSPs review of the representations made to support the Local Plan to date does not identify full support and backing for the measures. This creates a risk that the developments will come forwards without the package of measures required to achieve the Transport Strategy. Once such example is the new link between the A257 Littlebourne Road and the A2 junction at Bridge. This passes through multiple site allocations in different ownerships and crosses Network Rail land. For Policy SS5 to be considered sound the deliverability of such a link should be fully tested and understood. It is unclear from the information presented to date whether this is the case.
- 2.3.6 Even if the measures identified are achieved the strategic modelling undertaken to support the local plan identifies other issues which would need to be addressed. These are discussed in more detail in Chapter 3 of this note but in summary include:
- Significant volumes of traffic attempting to avoid the city centre ring road and route via Fordwich to connect between the A28 and A257
 - Significant volumes of traffic attempting to avoid the city centre ring road and utilise roads to the south of Canterbury to connect with the A28 to/from Ashford
 - Traffic routing along Radfall Road and Hackington Road as a result of delivering slip roads onto the A299 associated with the Brooklands Farm development

¹ National Planning Policy Framework (NPPF) December 2024 – Paragraph 110.

- 2.3.7 Currently, no measures appear to have been proposed to address these issues, despite being evident in all scenarios presented in the strategic modelling.
- 2.3.8 WSP's review of the strategic modelling also questions how the measures set out in the Transport Strategy have actually been considered. Key commitments made within Policy SS5 which don't appear to have been considered in the strategic modelling undertaken to date include:
- The reallocation of road space within the city centre proposed to encourage travel by active modes and public transport
 - The reduction in city centre parking and increased use of P&R facilities on the edge of the city
- 2.3.9 Without supporting evidence for how the measures set out within Policy SS5 will achieve the objectives of the Transport Strategy the policy cannot be considered sound.
- 2.3.10 Policy DS16 – Movement Hierarchy sets out that proposals for new development should follow the movement hierarchy. This policy is supported but should be supplemented by opportunities for working from home and the provision of mixed use developments within the strategic growth locations so that the need to travel can be reduced.
- 2.3.11 Policy DS17 – Active and Sustainable Travel sets out that developments of more than 300 homes should maximise opportunities for alternative and innovation travel options. This includes the provision of mobility hubs. This policy is supported but it should be noted that opportunities offering shared and micro-mobility services within the mobility hubs needs to be delivered at a district wide level to maximise opportunities for use of these modes. If the responsibility for delivery of such services falls to individual developers, the services that come forwards are likely to be more limited in scope and scale.
- 2.3.12 Policy DS18 – Highways and Parking sets out requirements for Transport Assessments that accompany planning applications for development. The policy appears to be missing reference to both the requirement to take a Vision-led approach as advocated by the NPPF² and Kent County Council's Transport Assessment Guidance³.

² NPPF – Paragraph 109

³ Kent County Council Transport Assessment & Travel Plan Guidance 2025

2.4 Draft Canterbury District Transport Strategy (2026)

- 2.4.1 The Draft Canterbury District Transport Strategy (2026) builds upon the 2025 draft strategy and takes into account the previous consultation undertaken. In line with national policy, CCC and KCC propose a 'vision and validate' approach to the new Transport Strategy to set a framework for proactively managing the impacts of planned development in a manner that can maximise take up of sustainable and active travel options whilst ensuring there is adequate highway resilience.
- 2.4.2 The measures outlined within the strategy are broken down into; short term, medium term and long term:
- Short Term (0-5 years) – measures to allow buses to turn right from Downs Road to St Stephen's Hill to unlock an alternative route to the University, a city hopper bus service, parking supply reduction of 10% in the city centre and changes to parking charges to increase P&R usage
 - Medium Term (6-10 years) – improve bus frequency, walking and cycling improvements, parking controls for new developments, targeted ring road bus lanes, additional car park closures/ reductions and specific junction improvements.
 - Long Term (11-16 years) – full ring road bus lanes, potential new park and ride sites, further bus frequency improvements, walking and cycling improvements, workplace parking charges, last mile delivery network and controls and specific junction improvements.

Walking and Cycling

- 2.4.3 The walking and cycling improvements outlined in the transport strategy are focused on those to be delivered by the strategic developments within Canterbury District.
- 2.4.4 There is an overall aim to reallocate road space, with a focus on the ring road and roundabouts around the city centre. Whilst the principle of this measure is welcomed it is unclear what modelling has been undertaken to determine the feasibility of this.

Public Transport

- 2.4.5 The bus action plan includes a target to at least double the bus mode share in the built- up areas of Canterbury, Herne Bay and Whitstable to achieve a 16% mode share.
- 2.4.6 The major changes outside of the strategic committed development sites which themselves promote implementing bus improvements are the reallocation of road space to provide dedicated bus lanes to improve bus reliability and service speed and the signalisation of the ring road from roundabouts to enable bus priority to be implemented at the junctions. Again, whilst the principle of these measures is welcomed it is unclear what modelling has been undertaken to determine the feasibility of this.

Local Plan Modelling

- 2.4.7 The Transport Strategy sets out a series of mode share targets to be achieved through the interventions proposed. The headline target being a 20% shift to sustainable travel modes when compared to a 2011 base. This target is supported.
- 2.4.8 The Transport Strategy suggests that the modelling undertaken demonstrate that the vision of a mode switch to sustainable transport, supported by a reallocation of road space, will be achievable. WSP would question the conclusion reached. The modelling presented identifies significant impacts on roads around Canterbury (as explained in more detail in Chapter 3 of this note) which are not addressed. Further work is required in order to address these issues.

UoK proposed Site Allocation alignment with Transport Strategy

- 2.4.9 **Table 2-1** shows how the UoK's proposed site allocation (Sites BCD) will align with the Draft Canterbury District Transport Strategy.

Table 2-1 – How the Development at UoK aligns with the Draft Canterbury District Transport Strategy

Policy	Development Alignment
Strategy Overview – 0-5 years short term implementation plan	Allowing a right turn from Downs Road to the university would support more bus routes between the city centre and the university, further enhancing the bus based Transport Strategy for Sites BCD. Improving the walking and cycling connection between Herne Bay and Canterbury via the Crab and Winkle Way forms a key component of the Transport Strategy for Sites BCD. Reducing parking within the city centre would aid in reducing traffic volumes on the A290 Whitstable Road corridor, assisting with delivery of development on this corridor.
Strategy Overview – 6-10 years medium term implementation plan	The development would support additional bus frequency and overall bus operating times enhancements between the university and the city centre. The development supports the reallocation of road space to enhance bus services as it would support the reduction of private vehicles in the city centre. The development would support the reduction in car parking capacity in the city centre to encourage active and sustainable travel into the city centre
Strategy Overview – 11-16 years long term implementation plan	The development proposals include within the Transport Strategy the potential to provide a P&R on the A290 corridor into Canterbury which would support the aim of a P&R on each corridor into Canterbury

Policy	Development Alignment
	The University already have a workplace parking charge in place. However, the Transport Strategy for Sites BCD seeks to review this to achieve a reduction in private vehicle trips to/from the University
Walking and Cycling – Mobility Hub	The development will provide a mobility hub to offer a range of shared and micro-mobility modes to encourage active and sustainable travel
Walking and Cycling – Road Space Reallocation	The changes proposed within the LCWIP along with those outlined in the wider Transport Strategy will make walking and cycling from the development more attractive and quicker with the removal of the roundabouts and signal junctions implemented.
Public Transport – double the bus mode share in the built-up area	The development will benefit from an existing high frequency bus service between Canterbury City and the site as the services will be extended from the university to the on-site mobility hub.
Public Transport – Road Space Reallocation	The reallocation of road space to provide bus lanes and bus priority at the signal-controlled junctions will support the bus services between the university and the city centre.
Public Transport – expand the Park & Ride Services	Land has been identified on the University Campus to provide a Park and Ride type facility which would contribute to providing new Park and Ride facilities on the key corridors into the city centre.

2.5 Canterbury Local Cycling and Walking – Implementation Plan

Strategy Overview

- 2.5.1 The Canterbury Local Cycling and Walking – Implementation Plan (LCWIP) document outlines the aims and aspirations to significantly increase the number of walking and cycling trips up to 2042. The overall Transport Strategy relies on a substantial switch in travel mode and for shorter distance trips this means an increase in walking and cycling.

Development Alignment - Proposed routes and Improvements

- 2.5.2 **Table 2-2** outlines the proposed improvements relevant to the routes from the UoK to Canterbury City Centre. The table replicates the information from the LCWIP .

Table 2-2 – Proposed LCWIP improvements relevant to the UoK site

Ref	Action	Detail	Est. Cost	Proposed Funding Source
A5	Existing 20mph street. Add cycle symbols to carriageway and cycle lanes where width allows	St Dunstan's Street and Whitstable Road	£2,000	CIL
B3	Surface and illumination to existing bridlepath to provide a link from UoK to Stephenson Road with cycle contraflow to mini roundabout and traffic calming on link to St Stephen's Road	The bridlepath is well used by pedestrians and cyclists but consists of trodden earth and is difficult to cycle on. Geometric changes to the roundabout's splitter island will be needed to accommodate a cycle crossing and traffic calming to St Stephen's Hill to link to Hales Drive	£200,000	CIL
B5	Remove parking, widen footways and install table junction to provide better crossing area	Beaconsfield Road: short length of carriageway between the path adjacent to the former railway line and St Michael's Road. This requires cyclists to turn left then right in the carriageway at present – partially implemented 2025	£100,000	CIL

Ref	Action	Detail	Est. Cost	Proposed Funding Source
B6	Investigate “Share with Care” length of path and removal of barriers	At Hackington Place – partially implemented 2025	£1,000	CIL
G2	Waymarking to Park Wood Road and cycle lanes on carriageway	Completed 2025	£1,000	CIL
G3	Investigate narrowing carriageway and widening footway/ cycle lanes	The existing segregated paths are narrow and difficult for cyclists to pass without straying into the pedestrian side.	£50,000	CIL
G7	On road link to Alcroft Grange	This requires consent from the landowners, but no further works.	N/A	-
G8	Sign cycle route on local roads to existing toucan crossing	Clifton Road and Harcourt Drive	£500	CIL

2.5.3 WSP undertook a walking and cycling audit as part of the **Regulation 18 – Transport Appraisal** submitted in May 2024. As the development is taken forward the proposed improvements outlined above in **Table 2-2** will be reviewed in conjunction with the improvements noted as part of the walking and cycling audit, with the aim of providing the most attractive active travel routes from the UoK to Canterbury city centre.

2.6 Canterbury District Bus Action Plan (February 2026)

2.6.1 In support of this submission regarding the Reg 19 Local Plan process, the evidence and proposals for the development of bus services and the bus network as a whole in the district of Canterbury have been reviewed by WSP’s public transport specialists, including those with detailed knowledge of the bus sector in Kent and the city of Canterbury.

- 2.6.2 The starting point for the review has been the Canterbury District Bus Action Plan (CDBAP – February 2026), prepared by consultants Steer for Canterbury City Council. An essential supporting document is the Canterbury District Bus Strategy – Baseline Report, also prepared by Steer, which is referenced as an Appendix to the CDBAP. It is however noted that the Baseline Report dates from 2 years previously (February 2024) and therefore does not reflect bus service changes, issues and developments in the meantime e.g. locally within Canterbury, the closure of Westgate Towers between April 2025 and March 2026 is understood to have been highly relevant to the bus network as well as traffic movements as a whole within the city centre.
- 2.6.3 Notwithstanding the above, the Baseline Report is acknowledged to provide background data sourcing and analysis which is carried forward directly into the CDBAP, with consequent alignment on methodological approach and content.
- 2.6.4 The CDBAP identifies that, *"Key challenges for bus in Canterbury relate to varying levels of connectivity across different times of day and days of the week, congestion issues resulting impacting on journey times, reliability and efficiency of bus operations, bus station capacity constraints and customer experience issues in terms of information provision, ease of payment and perceptions of anti-social behaviour"*.
- 2.6.5 WSP considers that these documented challenges do not represent all of the key challenges – for example, in common with most areas of England, the impact of the Covid-19 Pandemic on travel behaviour, remote working and shopping activity in Kent has significantly changed traditional strong suits for bus demand across different demographics, with consequential impact on the viability of existing services.
- 2.6.6 Similarly, in Canterbury specifically, the constrained historic nature of the built environment not only limits road space (which is mentioned, in respect of the 'ring road' where all traffic meets), but also informs the density of the city in the centre and along its arterial corridors and so in terms of comparison to other locations, it is a city in name but not in size. Understanding of such factors should be demonstrated to inform development of the bus network e.g. extending service provision outside of core daytime hours.
- 2.6.7 The CDBAP is also considered to demonstrate weak links between the above challenges and the proposed interventions and projected outcomes. Interventions are grouped broadly (customer experience, infrastructure, operations), but for an 'action plan', which conveys the impression of defined steps:
- Many were developed "without constraints around funding or deliverability", and therefore do not have planned funding routes, which gives rise to uncertainty about whether the interventions could even be likely to happen.
 - Some are rather high level, and therefore do not have a demonstrable quantified linkage to the outcomes.
- 2.6.8 Further, there is no clear causal mapping showing how each intervention addresses specific constraints (e.g. congestion → reliability → patronage).

2.6.9 Given the headline targets are directly related to a significant increase in the volume of bus trips – the majority of which are not projected to come from population growth – specific examples of interventions which cast doubt on the coherency of the CDBAP include:

- Anti-social behaviour is planned to be addressed by bus station safety measures, and 'Safer Travel' initiatives; while these are valuable in their own right to increase both the perception and reality of safety, and thus increase satisfaction, there is no evidence presented that these materially increase patronage or service provision and so can be considered as necessary but not sufficient measures to achieve the mode share of bus.
- A 'city hopper' service is proposed, however this would focus on internal city centre trips, which are typically short, with the alternative walking routes dominated by relatively flat and straight routes. In order to be attractive, it would need to operate at high frequency, adding further bus movements into key routes, such as the ring road, which already suffer from bus manoeuvring challenges. Such a network development does not address high car-dominated inbound corridors, where mode shift is needed (or may only achieve mode shift from other sustainable transport modes) and so this network change is not aligned with the highest mode shift opportunities.
- A specific target is included for P&R patronage, of 1 million trips per annum; the evidence base records that the historic peak (almost 20 years ago) was just over 600,000. While intercepting, and thus reducing, car trips into the city, is a noble aim the successful achievement of this depends on bus reliability and journey time. The CDBAP does not currently adequately explain how this trajectory will be achieved, as a P&R bus service without associated significant infrastructure or priority improvements will not address the issue of comparative journey time or any of the core bus network issues. Further, even if it could be achieved, the CDBAP does not indicate whether it would only alleviate future car trips and thus leave the city centre just as congested as it is currently.

2.6.10 Taking these observations as representative of the CDBAP as a whole, the CDBAP does not demonstrate that the proposed measures will deliver the stated mode share increases and volume of bus patronage, against the current trends and issues for the bus sector.

3. Transport Evidence Base Review

3.1 Introduction

3.1.1 This chapter reviews the latest transport evidence to support the Draft Canterbury District Local Plan: Regulation 19 consultation. This chapter outlines the limitations of the work undertaken to date. A review of the written representations made by the developer teams of the proposed strategic allocation sites around Canterbury has also been undertaken to better understand the transport evidence base used to inform the Local Plan and the modelling undertaken. The following documents have been reviewed:

- Canterbury Transport Modelling Forecast Report (February 2026)
- Written Representation for the Strategic Development Sites - Policy C10 Merton Park - Policy C15 Land South of Littlebourne Road and C16 Land South of Bekesbourne Lane – Policy W4 – Land at Brooklands Farm

3.2 Summary of Findings

3.2.1 The following represents a summary of the findings made by WSP in their review of the transport evidence base:

- The pattern of growth (concentrating development in the southeast of Canterbury) results in significant levels of congestion on the A257, A28 and City Centre ring road in the Do Something scenarios. Traffic is noted in the modelling to be rerouting onto minor roads to avoid this congestion (concentrated on the city centre ring road) to access the A28 (both north and south of Canterbury).
- The amount of traffic travelling between the A257 Littlebourne Road and the A28 Sturry Hill (using Stodmarsh Road, Moat Lane and through Fordwich) is forecast to be over 1,000 two-way vehicular trips in both peak hours. It is unlikely that these roads could accommodate this amount of traffic growth especially through the Village of Fordwich without significant improvement.
- The model appears to allow these volumes of traffic by overestimating the capacity of these rural links. This has the result of drawing traffic away from the A257, A28 and City Centre ring road where traffic would be more appropriately concentrated. Congestion on key links within the city such as the A257, A28 and City Centre ring road are therefore likely underestimated.
- The Canterbury Transport Model (CTM) anticipates that there will be over 5,000 two-way vehicular trips in the AM and PM peaks to and from the north/ northeast Kent Coast. This brings into question the spatial pattern of growth proposed in the Local Plan. By concentrating development in the southeast of the city, vehicular trips have to travel through the City Centre to/from the north/northeast Kent Coast. If the distribution of trips in the model is correct (which WSP question) then the growth locations have been incorrectly allocated based on the constraints of the existing highway network and no infrastructure appears to be proposed to address this.
- The Strategic development site at Brooklands Farm, Whitstable will provide new eastbound on and off-slips to/from the A299. Within the transport forecast model report it forecasts that the new development alongside the infrastructure of the new slip roads significantly

increases the traffic flow on Radfall Road/ Hackington Road. KCC Highways have been clear as part of scoping discussions for the UoK's proposed site allocation (Sites BCD) that increased traffic levels on the rural roads to the north such as Radfall Road and Hackington Road would be unacceptable. It is therefore concluded that the impacts arising from the Brooklands Farm are also unacceptable and need to be addressed before the Local Plan can be deemed to be sound.

- Owing to the significant issues highlighted above the transport evidence submitted to support the local plan demonstrates that both the pattern of growth proposed is inappropriate for the origins and destinations which the CTM suggests people will want to travel to/from and the modelling shows unacceptable impacts on rural roads which KCC have confirmed in discussions relating to the UoK's site allocation are unacceptable.

3.3 Canterbury Transport Modelling Forecast Report (February 2026)

- 3.3.1 The aim of the Forecast Report is to outline the highway impacts of the revised Canterbury Local Plan in the 2040 future baseline and the Do Something Scenarios based on the assumptions and methodology detailed within the document. This section presents the scenarios tested within the Canterbury Transport Model (CTM) and then details a series of limitations of the CTM modelling undertaken to date.

Forecast Scenarios Tested

- 3.3.2 The CTM is a weekday peak hour model (AM (08:00-09:00) and PM (17:00-18:00)). Four core scenarios have been developed in the model as set out in the Forecast Report:
- *'Future Baseline - This scenario includes completions and consented developments and infrastructure planned for the 2019-2040 growth period within Canterbury. Outside of this area, car growth was derived from TEMPro v8, while goods vehicle growth across the model was provided by Road Traffic Forecasts (RTF). This is the future baseline scenario against which the proposed Local Plan is assessed.*
 - *Do Something with Local Plan (DS1) - This scenario builds upon the Future Baseline scenario with the inclusion of proposed Local Plan allocations and associated access arrangements. The only differences between the Future Baseline and the Do Something (DS1) are the proposed Local Plan demand and infrastructure schemes including park and ride sites. Comparisons between the Future Baseline and Do Something (DS1) allow the potential impacts of the proposed allocations on the existing highway network to be determined.*
 - *Do Something with Transport Strategy (DS2) - This scenario builds on the Do Something (DS1) scenario, and includes a 10% modal shift, applied as a blanket reduction in trips. Infrastructure modelled relates to sustainable transport (e.g. bus lanes and walking and cycling improvements), demand management measures, and highways resilience developments.*
 - *Do Something with Larger Modal Shift (DS3) - This scenario builds on the Do Something with Transport Strategy (DS2) scenario and applies a further 10% reduction in trips, resulting in a total 20% reduction in trips, applied in the same blanket manner as the DS2. No infrastructure changes take place in this scenario.'*

- 3.3.3 It is worth noting that the DS2 and DS3 scenarios have been developed to test the principles outlined within the Canterbury Council's Transport Strategy, which aims to prioritise a move towards more sustainable travel and reduce car usage. The scenarios do not however apply the Transport Strategy, they instead apply blanket reduction factors and can only be therefore considered to provide an indication of what could happen should the Canterbury Transport Strategy be implemented in its current form.
- 3.3.4 It is understood that the Future Baseline and the DS1 scenarios are the only scenarios agreed with KCC as the highway authority. The results presented for Scenarios DS2 and DS3 should therefore be created with caution and cannot be relied upon.

3.4 South West Canterbury Strategic Development

- 3.4.1 The main development within the South West Canterbury Strategic Development area is Policy C10 Merton Park. Appendix D of the Model Forecast Report shows that 1737 dwellings have been assessed with an AM peak departure trip rate of 0.225 (two-way trip rate of 0.32) and a PM peak arrival trip rate of 0.206 (two-way trip rate of 0.34). This trip rate is very low for the site location. It is unclear from the evidence base submitted by the developers⁴ how these trip rates have been derived and whether they have been agreed with KCC as highway authority. This questions whether the highway assessment undertaken adequately accounts for the likely vehicular trip generation of the site.

Link Flows – Minor Links

- 3.4.2 Within Appendix H of the Forecast Report there are a series of link flows presented for each of the scenarios. A detailed review undertaken by WSP indicates that a significant amount of traffic travelling to/from the South West Canterbury Strategic Development is forecast to use rural routes. The link capacity of these minor roads to the south of Canterbury is likely to be very low.
- 3.4.3 **Table 3-1** presents the forecast peak hour flows on these rural roads and Figure 1 presents the locations of the links referenced below.

Table 3-1 – Minor Link Flows in the AM and PM Peaks in the DS1 Scenario

Ref	Road	AM Peak			PM Peak		
		Northbound/ Eastbound	Southbound/ Westbound	Two- way	Northbound/ Eastbound	Southbound/ Westbound	Two- way
1	Cockering Road	58	107	165	33	165	198
2	Faulkners Lane/ Bigbury Road	347	155	502	346	132	478

⁴ Canterbury Local Plan Evidence Vol 1 - Sustainable Transport Strategy – Policy N1 – Merton Park, Canterbury, Canterbury Local Plan Evidence Volume 2 - Traffic Impact Assessment – Policy N1 - Merton Park Canterbury

Ref	Road	AM Peak			PM Peak		
		Northbound/ Eastbound	Southbound/ Westbound	Two- way	Northbound/ Eastbound	Southbound/ Westbound	Two-way
3	Howfield Lane	79	218	297	76	210	286
4	Denstead Lane	169	204	373	225	184	409
5	Hatch Lane	334	204	538	312	232	544
6	Chartham Downs Road	497	219	716	459	189	648
7	Mystole Lane	164	137	301	158	111	169
8	Bridge Road	285	319	604	284	199	483
9	New House Lane	142	31	173	92	29	121

Source - Figures taken from Page 150-151 from the Canterbury Transport Modelling Forecast Report

Figure 1 – South West Canterbury Minor Links

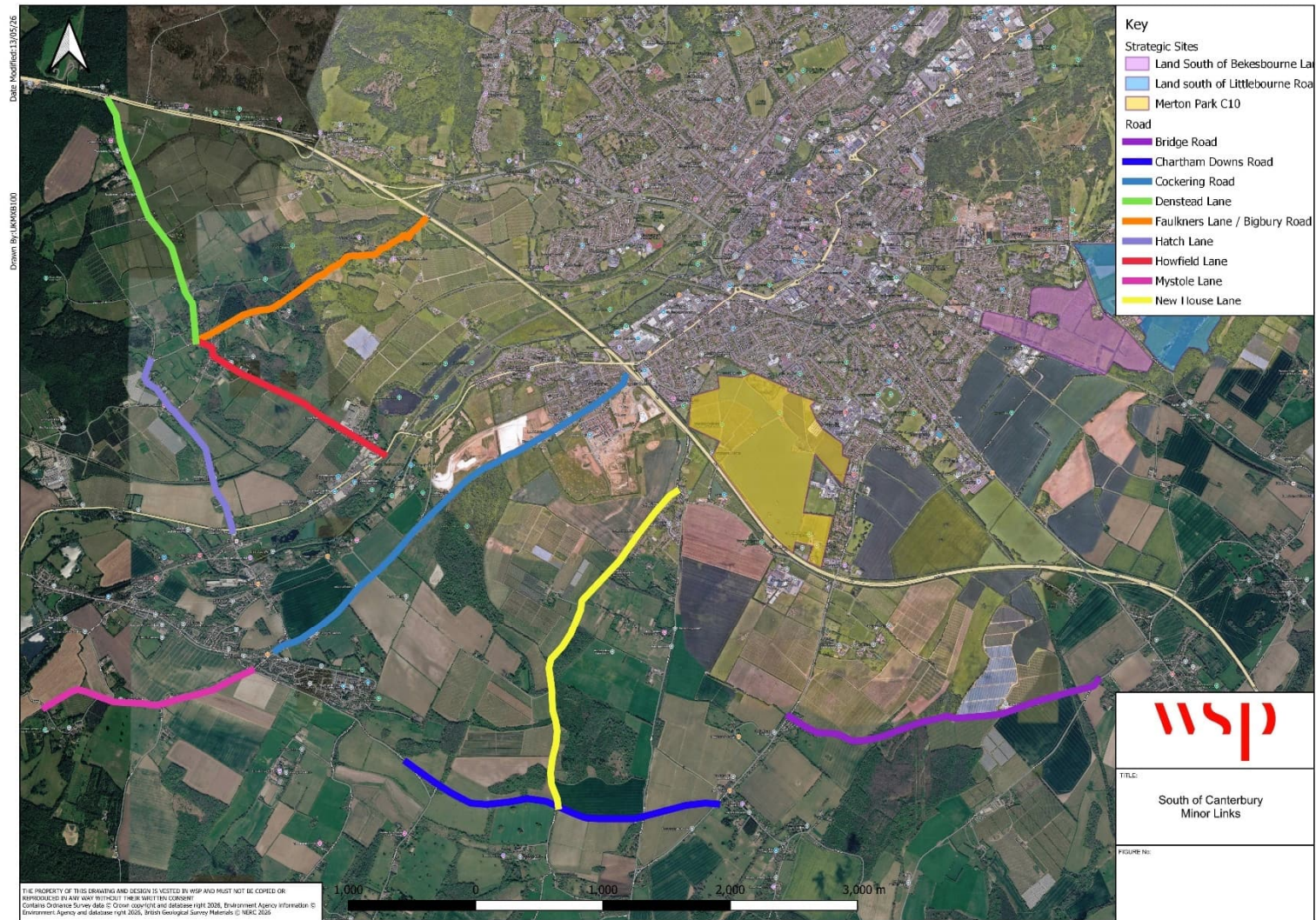


Figure 3 - Faulkners Lane existing highway conditions



3.4.7 Bigbury Road (**Figure 4**) is the western end of this link. The road is approximately 4.2m wide and as such it is not possible for two vehicles to pass safely. The suggestion that up to 500 vehicles could pass safely along this link in an hour without it being improved is difficult to believe.

Figure 4 – Bigbury Road existing highway conditions



Howfield Lane

- 3.4.8 Howfield Lane connects Chartham Hatch and the A28 Ashford Road, the road is approximately 4.5m wide without a centre line. The road has access points to a number of properties which motorists appear to use as informal passing places to allow vehicles travelling in the opposite direction to pass. **Figure 5** shows existing conditions on Howfield Lane.

Figure 5 – Howfield Lane existing highway conditions



Hatch Lane

- 3.4.9 Hatch Lane is a 4.2-5m wide single carriageway road connecting Chartham Hatch to the A28 which is further west than Howfield Lane. Hatch Lane varies between enabling two vehicles to pass safely and only having enough width for a single vehicle to pass whilst vehicles in the opposing direction would need to wait. Similarly to Falkners Lane it is unlikely that the forecast flow of approximately 500 vehicles per hour could be accommodated on this link.
- 3.4.10 There is also a level crossing present on this link which would further reduce capacity. **Figure 6** shows the existing conditions on Hatch Lane.

Figure 6 – Hatch Lane existing highway conditions



- 3.4.11 Faulkners Lane/Bigbury Road and Howfield Lane or Hatch Lane provide an alternative route between the west of Canterbury and the A28 without having to pass through the city centre ring road. As shown from the flows in **Table 3-1** there are approximately 500 two-way vehicle movements forecast to use this route in the AM and PM peaks. It is unlikely that these rural routes would be able to accommodate these volumes of traffic. This over-estimation of traffic flow means that the modelling is under-estimating the level of congestion and delay that is likely to occur on the A28 and on the city centre ring road.

Hollow Lane

- 3.4.12 Hollow Lane provides one of two vehicular access points for the Merton Park development. Hollow Lane is located to the west of Merton Park and provides access to the A28 to the north and into New House Lane and Merton Lane to the south. Hollow Lane is approximately 4.5-5m wide with no centre line provided for the duration of the link until the Hollow Lane/ Homersham/ Braye Brook Road roundabout at the northern end. **Figure 7** presents the existing conditions on Hollow Lane. Whilst Hollow Lane could be improved where there is site frontage it is unclear how it would be improved north to the south of the site to enable it to provide sufficient access for a 1950 home development.

Figure 7 - Hollow Lane existing highway conditions



New House Lane

- 3.4.13 New House Lane is a single carriageway two-way road providing a link between Hollow Lane and Chartham Downs Road (from where the A28 can be accessed). New House Lane is between 3.5-4m wide and operates as a single track road with a series of formal and informal passing places provided to enable the two-way movement of vehicles. This would have a significant impact on the capacity and journey time using New House Lane. The forecast report for DS1 suggests that between 130-170 vehicles would use this link in the peak hours. This appears to be optimistic for the status of this link. The existing conditions on New House Lane are shown in **Figure 8**.

Figure 8 – New House Lane existing highway conditions



Link Flows – Strategic Routes

3.4.14 This section presents the link flows on the more significant routes South of Canterbury heading towards Ashford on the A28 Ashford Road and B2068 Nackington Road. **Table 3-2** presents the AM and PM peak flows on the two north/ south links in the DS1 scenario.

Table 3-2 – Traffic flows on the Strategic routes towards Ashford in the DS1 scenario

Link	AM Peak			PM Peak		
	Northbound	Southbound	Two-way	Northbound	Southbound	Two-way
B2068 Nackington Road	712	328	1,040	448	403	851
A28 Ashford Road (South of A2)	317	327	644	190	364	554

3.4.15 **Table 3-2** shows that the B2068 carries significantly more traffic compared to the A28 in both the AM and PM peak to the south of the A2. This seems odd in itself given the more strategic nature of the A28 when compared to the B2068. In order to understand this in more detail **Table 3-3** shows the traffic flows on the same links in the DS2 and DS3 scenarios.

Table 3-3 – Traffic flows on the Strategic routes towards Ashford in the DS2 and DS3 scenarios

Road	AM Peak			PM Peak		
	Northbound	Southbound	Two-way	Southbound	Northbound	Two-way
DS2						
B2028 Nackington Road	661	285	946	414	352	766
A28 Ashford Road (South of A2)	314	294	608	195	372	567
DS3						
B2028 Nackington Road	607	277	884	378	314	692
A28 Ashford Road (South of A2)	362	286	648	283	324	557

- 3.4.16 The traffic flows in **Table 3-3** forecast a decrease on the B2068 Nackington Road of around 10% for the two-way flows when comparing the flows to the preceding scenario. This aligns with the Transport Strategy which details that DS2 has a 10% reduction in trips compared to DS1. The A28 Ashford Road however shows similar flows across the three scenarios. This indicates that there is significant suppressed demand for the A28 as a route in the DS1 likely as a result of congestion. This traffic is therefore likely using less suitable routes in the DS1 scenario to avoid the A28. This suppressed demand should be quantified and an assessment run with the trips re-assigned.

Junction Capacity – Strategic Routes

- 3.4.17 A review of the forecast junction capacity assessments has been undertaken. **Table 3-4** presents the junctions that are forecast to operate at/above capacity in the Southern area of Canterbury on the key strategic routes into Canterbury. **Table 3-4** is a replica of Table 5-2 from the forecast report (Page 65) with only the junctions included associated with the southern part of Canterbury. The junctions that operate at/above capacity (LoS of E and F) for all scenarios are listed and indicated by a 'tick' mark.

Table 3-4 - LOS Junctions at or above Capacity

No.	Name	FB		DS1		DS2		DS3	
		AM	PM	AM	PM	AM	PM	AM	PM
1	Castle Street/ Wincheap Roundabout	X	✓	X	X	X	X	X	X
2	A28 Thanington Road/ St Nicholas Road	X	X	✓	✓	X	✓	X	X
5	Old Dover Road / Oaten Hill	X	X	X	X	✓	✓	X	X
7	A28 Wincheap/Simmonds Road	X	X	✓	X	X	X	X	X
12	B2068 Old Dover Road/St Lawrence Road	✓	✓	✓	✓	✓	✓	✓	X
30	Watling Street/Riding Gate Roundabout	X	X	X	X	✓	X	X	X
35	A28 Wincheap / Ten Perch Road	✓	✓	✓	✓	✓	✓	✓	✓
36	A28 Wincheap / Homersham	X	X	✓	✓	✓	✓	✓	✓

- 3.4.18 **Table 3-4** highlights that the junctions around the A28/ A2 gyratory and the vehicular access point for the Merton Park development (junction 36) will operate at/above capacity in every Do Something scenario. This indicates that the A28 corridor cannot accommodate the additional traffic forecast. Furthermore, if traffic reroutes via the B2068 Nackington Road and accesses Canterbury via the B2068 the results from junction 12 indicate that the B2068 corridor has a significant capacity constraint too.

Summary

- 3.4.19 WSP's review of the forecast report indicates:

- The A28 is unable to accommodate the amount of forecast traffic associated with the level of growth proposed.
- Traffic is re-routing to avoid using the A28 onto less suitable routes.
- The volume of traffic using less suitable routes in the vicinity of Merton Park is unlikely to be able to accommodate the volume of traffic anticipated without significant improvements.
- A further model run is required which places the traffic using the less suitable routes back onto the A28 to understand the real level of congestion and delay that will occur in this part of Canterbury as a result of the level of growth proposed.

3.5 East Canterbury Strategic Development

- 3.5.1 The East Canterbury Strategic Development Area consists of Policy C15 Land South of Littlebourne Road and C16 Land South of Bokesbourne Lane.
- 3.5.2 The modelling undertaken assumes that a highway link will be provided to the south of these development sites to connect with Mountfield Park which in turn will allow connection to the A2050. The written representations⁵ do not appear to commit to delivery of this link by the respective developers. It is therefore questioned whether such a link should be included in the modelling undertaken to support the local plan.
- 3.5.3 The written representation makes little reference to the proposed Park & Ride facility on the A257 corridor from Policy SS5 which is clearly key for the reduction in overall vehicular trips associated with DS2 and DS3 scenarios. Again it is unclear who will be funding this Park & Ride facility. The modelling undertaken appears to rely upon delivery of this infrastructure to reduce traffic levels on the A257 to facilitate the growth proposed.

Link Flows – Minor Links

⁵ Draft Canterbury District Local Plan – Focused consultation 2025 – Regulation 18 Consultation 21st October 2025 – Gladman and Briefing Note - Draft Canterbury District Local Plan: Focused Consultation 2025 (Regulation 18) 21st October 2025 – Lichfields

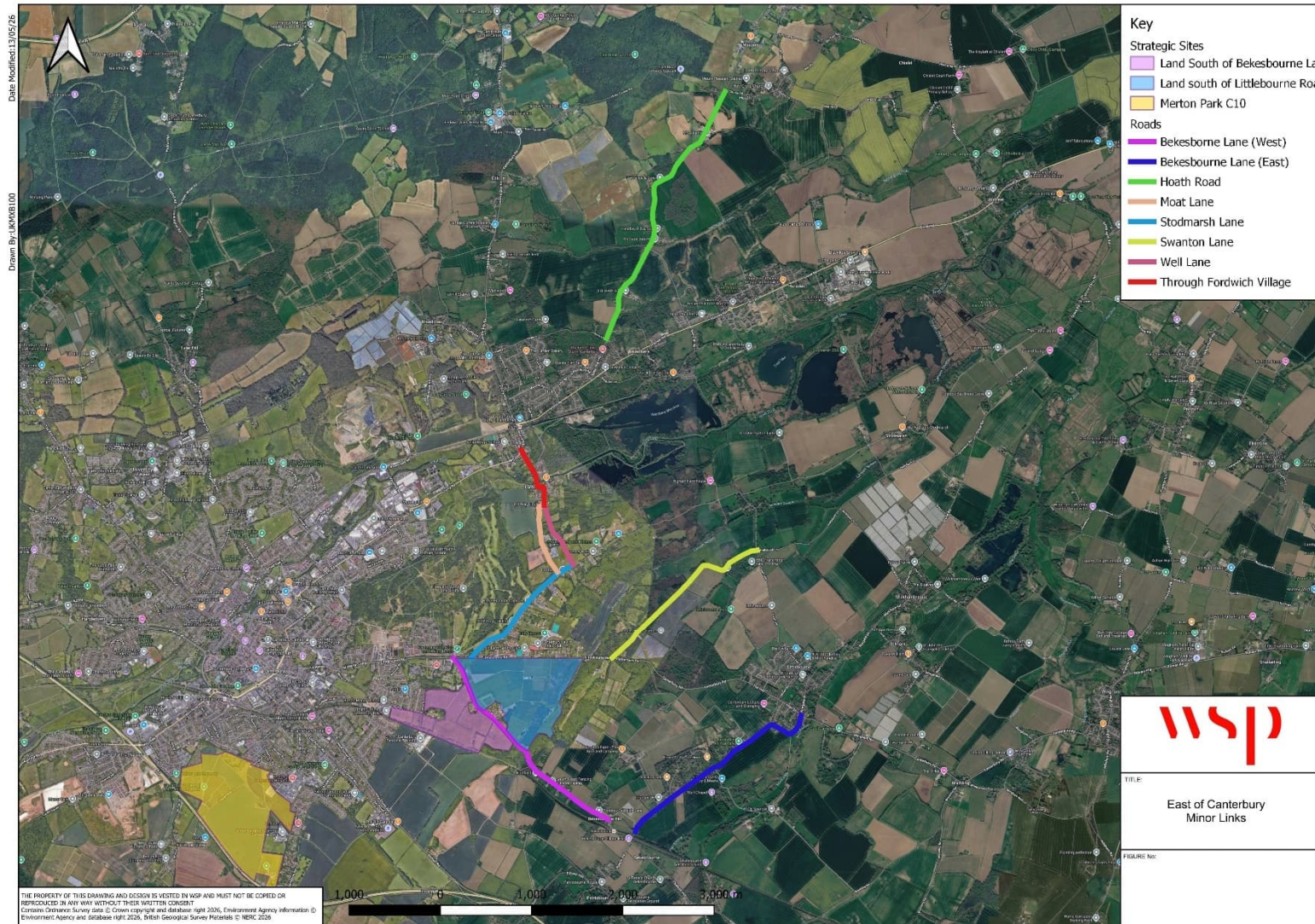
- 3.5.4 Within Appendix H of the Forecast Report there are a series of link flows presented for each of the scenarios. A detailed review undertaken by WSP indicates that a significant amount of traffic travelling to/from the East Canterbury Strategic Development area is forecast to use rural routes. The link capacity of these minor roads to the east of Canterbury is likely to be very low.
- 3.5.5 **Table 3-5** presents a series of peak hour flows on the roads in the vicinity of Canterbury. **Figure 9** presents the locations of the links referenced in the table.

Table 3-5 - Minor Link Flows in the AM and PM peak in the DS1 Scenario

Ref	Road	AM Peak			PM Peak		
		Northbound/ Eastbound	Southbound/ Westbound	Two- way	Northbound/ Eastbound	Southbound/ Westbound	Two- way
1	Stodmarsh Road	450	664	1,114	653	479	1,132
2	Moat Lane	569	743	1,312	655	516	1,171
3	Well Lane	68	177	245	-	-	-
4	Bekesbourne Lane (East)	420	505	925	503	379	882
5	Swanton Lane	52	202	254	158	32	190
6	Bekesbourne Lane (West)	22	48	70	48	46	94
7	Hoath Road	229	179	408	169	135	304

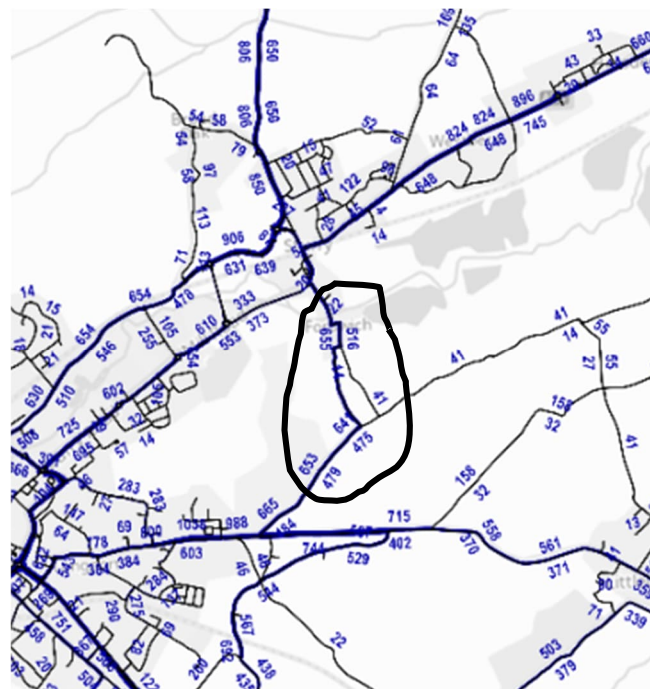
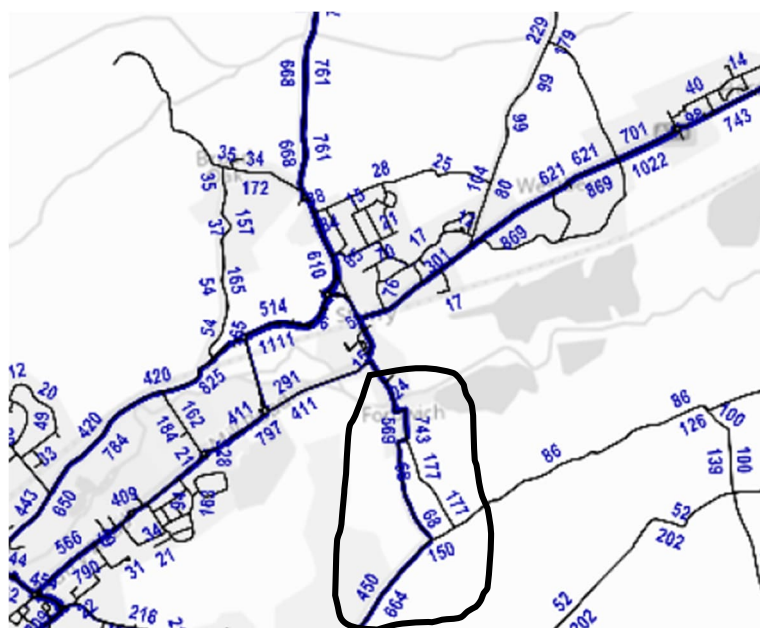
Source - Figures taken from Page 150-151 from the Canterbury Transport Modelling Forecast Report

Figure 9- East Canterbury Minor Links



3.5.6 **Figure 10** is taken from Appendix H of Canterbury Transport Modelling Forecast Report on pages 150 and 151. It highlights that over 1,000 vehicular movements are anticipated to use Stodmarsh Road between the A257 Littlebourne Road to A28 Sturry Hill. The condition of this route is described in more detail below.

Figure 10 – DS1 traffic flows on the minor links to the east of Canterbury in the AM and PM Peak



Stodmarsh Road

3.5.7 Stodmarsh Road provides a link between the A257 Littlebourne Road and the village of Stodmarsh, located east of Canterbury. The road features a two-way single carriageway with no centre line provided and the width of the carriageway varies between 4.8-5m. In nature the road has residential properties on the eastern side of the carriageway from the A257 to Moat Lane. **Figure 11** below presents the existing conditions on Stodmarsh Road.

Figure 11 - Stodmarsh Road existing highway conditions



Moat Lane

- 3.5.8 Moat Lane is a rural link which connects Stodmarsh Road to the village of Fordwich. The road features a two-way single carriageway. The northern section of the road has a centre line provided as the road is approximately 5m in this area, whilst the southern section has no centre line provided as the width is around 4.8m. **Figure 12** shows the existing highway conditions on Moat Lane.

Figure 12 – Moat Lane existing highway conditions



Well Lane

- 3.5.9 Well Lane is a rural road which links Stodmarsh Road to the village of Fordwich, the link operates in parallel to Moat Lane and provides access to farm fields and a traveller site. The road is a two-way single carriageway but due to its constrained width (3.8m wide) can only accommodate vehicles in a single direction. The road has no formal passing places just informal locations at the access points to side roads. The modelling suggests that 245 vehicles are going to use this link in the AM peak hour. It is unlikely this would be achievable in reality. **Figure 13** presents the existing conditions on Well Lane.

Figure 13 – Well Lane existing highway conditions



High Street/ King Street (Fordwich)

3.5.10 High Street/ King Street runs through the centre of Fordwich. The link operates as a two-way road and links the A28 to Moat Lane/ Well Lane. The road is characterised by tight bends and three traffic calming measures which provide one-way movement of vehicles (priority working) one of these is imposed by a narrow bridge over the Great Stour. There are areas with significant on-street parking allowed north and south of traffic calming measures which narrows the width of the road to a single vehicle width. The modelling forecasts a two-way traffic flow of over 1,100 vehicles. This is unlikely to be achievable without significant improvements which would unlikely to be possible on the alignment of the existing road. **Figure 14** below presents the existing conditions through Fordwich.

Figure 14 – High Street/ King Street (Fordwich) existing highway conditions



Bekesbourne Lane (West)

- 3.5.11 Bekesbourne Lane (West) will be downgraded as part of the East Canterbury Strategic development sites. A new access will be built onto the A257 Littlebourne Road to accommodate the traffic associated with the sites. Bekesbourne Lane currently links to Bekesbourne Lane (East) to the A257 Littlebourne Road and is a two-way single carriageway road with no centre line provided and is approximately 4-4.5m wide. There are sections where only a single vehicle can pass and oncoming vehicles are required to wait. **Figure 15** below present the existing highway conditions on Bekesbourne Lane (West).

Figure 15 - Bekesbourne Lane (West) existing highway conditions



Swanton Lane

3.5.12 Swanton Lane is located between Littlebourne and Canterbury and is accessed via the A257 Littlebourne Lane. The road is only 3.8m wide and only enables one-way movement even though it's a two-way road. There are a number of informal passing places provided along the link. The modelling forecasts that up to 250 vehicle movements will use this link in the peak hours. The existing conditions are presented in **Figure 16** below.

Figure 16 – Swanton Lane existing highway conditions



Bekesbourne Lane (East)

- 3.5.13 Bekesbourne Lane (East) links the villages of Patricxbourne to Littlebourne. The road features a two-way single carriageway and is between 5-5.5m wide throughout. The existing conditions are presented in **Figure 17** below.

Figure 17 – Bekesbourne Lane (East) existing highway conditions



Summary

- 3.5.14 In summary, the modelling indicates that there is a significant desire for traffic to utilise Stodmarsh Road, Moat Lane and finally through the village of Fordwich to link A257 Littlebourne Road and A28 Sturry Hill. The model forecasts in the DS1 scenario that approximately 1,100-1,200 two-way vehicle movements will route this way in the AM and PM peak. A review of this route highlights that the routing of this volume of traffic is inappropriate without significant improvements being made. This calls into question the spatial pattern of growth proposed for this part of Canterbury and what the true levels of congestion might be on the key A257 and A28 corridors. If these sites continue to be promoted the modelling should be re-run with the traffic currently routing along inappropriate routes re-assigned onto the A257 and A28.

Link Flows – Strategic Routes

- 3.5.15 This section presents the link flows on the more major routes Northeast and east of Canterbury heading towards Sandwich, Margate and Ramsgate on the A28 Sturry Road, Broad Oak Road and A257 Littlebourne Road. **Table 3-6** presents the AM and PM peak flows on the two north/south links in the Do Something 1 scenario

Table 3-6 - Traffic flows on the Strategic routes into Canterbury from the South in the DS1 scenario

Link	AM Peak			PM Peak		
	Eastbound	Westbound	Two-way	Eastbound	Westbound	Two-way
A28 Sturry Road	566	790	1,356	725	695	1,420
Broad Oak Road	420	784	1,204	654	546	1,200
A257 Littlebourne Road	547	1186	1,733	1038	603	1,641

3.5.16 The traffic flows highlight that the two parallel links of the A28 Sturry Road and Broad Oak Road have a similar two-way flow in both the AM and PM peaks. Whilst A257 Littlebourne Road has a tidal style flow with a significantly higher number of vehicles heading towards the city centre in the AM peak and departing in the PM peak.

3.5.17 In order to understand how the traffic flows change in the DS2 and DS3 scenarios which focuses on reducing vehicular traffic flow, **Table 3-7** presents the link flows on the two links into Canterbury.

Table 3-7 - Traffic flows on the Strategic routes into Canterbury from the South in the DS2 and DS3 scenarios

Road	AM Peak			PM Peak		
	Eastbound	Westbound	Two-way	Eastbound	Westbound	Two-way
DS2						
A28 Sturry Road	491	766	1,257	643	601	1,244
Broad Oak Road	401	717	1,118	598	472	1,070
A257 Littlebourne Road	526	1180	1,706	990	601	1,591
DS3						

Road	AM Peak			PM Peak		
	Eastbound	Westbound	Two-way	Eastbound	Westbound	Two-way
A28 Sturry Road	479	742	1,221	612	569	1,181
Broad Oak Road	364	665	1,029	551	441	992
A257 Littlebourne Road	499	1091	1,590	900	537	1,437

3.5.18 The traffic flows in **Table 3-7** forecast a decrease in flow of approximately 10% between each of the DS1, DS2 and DS3 scenarios on Broad Oak Road in the AM and PM peak. Focusing on A257 Littlebourne Road there is only a small reduction in traffic flow between DS1 and DS2 between 0-5% whilst the DS2 and DS3 change is nearer the 10% change included within the Transport Strategy. Finally, the A28 Sturry Road there is approximately a 10% reduction as outlined in the Transport Strategy between the DS1 and DS2 while the reduction between DS2 and DS3 is approximately 5%.

Junction Capacity – Strategic Routes

3.5.19 A review of the forecast junction capacity assessments taken from the Canterbury model has been undertaken. **Table 3-8** presents the junctions that are forecast to operate at/above capacity in the eastern area of Canterbury on the key strategic routes into Canterbury. The table is a replica of Table 5-2 from the forecasting report (Page 65) with only the junctions included associated with the eastern area of Canterbury. The junctions that operate at/above capacity (LoS E and F) for all scenarios are listed and indicated by a 'tick' mark.

Table 3-8 - LOS Junctions at or Above Capacity East Canterbury Strategic Routes

No.	Name	FB		DS1		DS2		DS3	
		AM	PM	AM	PM	AM	PM	AM	PM
4	Military Road/A28 Military Road/A28 Tourtel Road Roundabout	X	X	✓	X	✓	✓	✓	X
11	A257 Littlebourne Road/Stodmarsh Road	✓	X	✓	X	✓	X	✓	X
14	A257/Buffs Road	✓	✓	✓	✓	✓	✓	✓	✓
24	A28 Sturry Road/Marshwood Close	X	✓	X	✓	X	X	X	X

No.	Name	FB		DS1		DS2		DS3	
		AM	PM	AM	PM	AM	PM	AM	PM
31	A28 Military Road/A28 Tourtel Road/Military Road Roundabout	X	X	X	✓	X	X	X	X

3.5.20 The results from the junctions LOS show that there are significant delays forecast on the A257 and A28 corridors into Canterbury. This is before account is made of the inappropriate routing that is currently taking place in the model. Once this is accounted for it is likely that congestion would worsen.

Summary

3.5.21 The East Canterbury Strategic Development area appears to have a significant impact on the rural route that connects the A257 Littlebourne Road and A28 Sturry Hill. A two-way movement of over 1,000 vehicles in each peak hour in each scenario is documented which is considered unrealistic for the road infrastructure that currently exists. Either significant improvement in infrastructure is required to facilitate the growth proposed in this part of Canterbury or the pattern of growth should be re-visited.

3.5.22 The additional effect of this routing is that congestion levels on the A257 and A28 are likely to be under-estimated. As a minimum, the traffic using these more rural routes should be re-assigned onto the A257 and A28 to understand the likely level of congestion and delay that will result from this level of growth in this part of Canterbury.

3.6 Trip Distribution

3.6.1 A review of the Do Something 1 scenario highlights a significant amount of traffic travelling to/from the north/ northeast in the model. **Table 3-9** presents the actual vehicular movements in the AM and PM peaks. These are also shown spatially in **Figure 18** and **Figure 19**.

Table 3-9 – Trip Distribution North/ North East to/from Canterbury in the AM and PM Peak in the DS1 scenario

Link	AM Peak			PM Peak		
	Northbound/ Eastbound	Southbound/ Westbound	Two-way	Northbound/ Eastbound	Southbound/ Westbound	Two-way
A290	309	754	1,063	647	339	966
Hackington Road	472	882	1,354	796	333	1,129

Link	AM Peak			PM Peak		
	Northbound/ Eastbound	Southbound/ Westbound	Two-way	Northbound/ Eastbound	Southbound/ Westbound	Two-way
Herne Bay Road	668	761	1,429	806	650	1,456
A28	701	1022	1,723	896	745	1,641
Total	2,150	3,419	5,569	3,145	2,067	5,192

Figures taken from Page 150-151 from the Canterbury Transport Modelling Forecast Report

Figure 18 – DS1 link flows on the roads to the north of Canterbury in the AM Peak

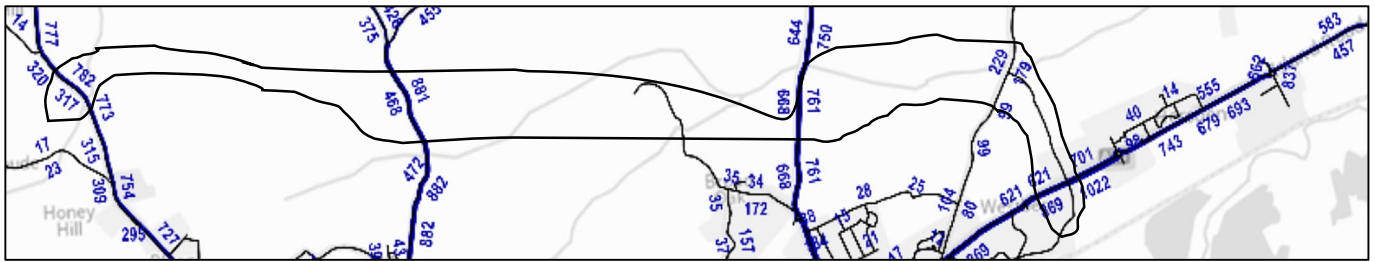
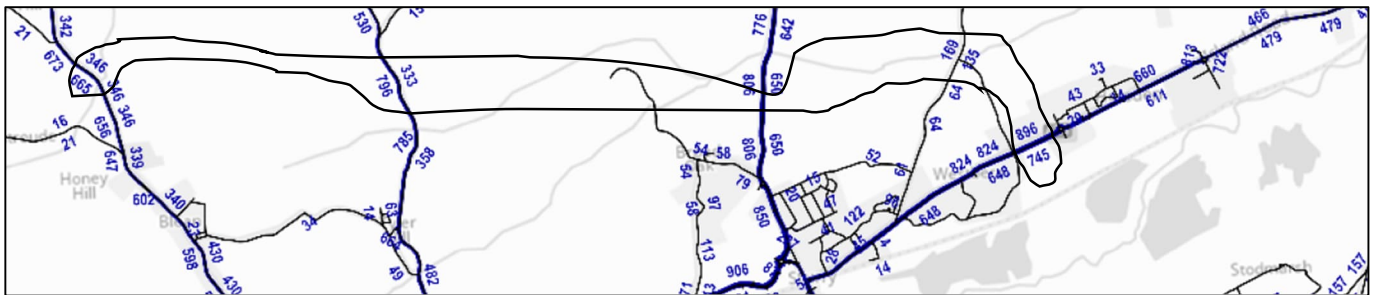


Figure 19 - DS1 link flows on the roads to the north of Canterbury in the PM Peak



- 3.6.2 The modelling forecasts that in the AM and PM peaks there will be over 5,000 two-way movements between Canterbury and the north/ north east Kent Coastline.
- 3.6.3 In order to understand what is driving the demand, a review has been undertaken of the 2011 journey to work Census data to look into the origin and destination data for those people either living in Canterbury and working on the north/ northeast Kent coast or vice visa.
- 3.6.4 Reviewing those who live in Canterbury and work on the north/ northeast Kent coast, only 8% of the working population from Canterbury work to the north of Canterbury this is in comparison to 60% working internally within Canterbury. Removing those who work in Canterbury this increases the proportion to about 25%.
- 3.6.5 As the northeast of Kent falls within Thanet District Council the same exercise has been undertaken to understand the percentage of the workday population who likely travel to the city of Canterbury as they would likely use the links outlined in **Table 3-9** above. The percentage of people working in Canterbury is just 7% with approximately 70% staying locally and working within Thanet District Council.
- 3.6.6 Based on this census analysis it is likely that the model is over-estimating the attractiveness of travelling to/from the north-east. This means that the results presented to date from the CTM should not be relied upon until a review of the distribution has been undertaken.

3.7 Brooklands Farm, Whitstable

- 3.7.1 The Brooklands Farm development (Policy W4) is to provide a new access from the A299 to enable the development as well as the other five new site allocations proposed within the area.
- 3.7.2 The effect of this infrastructure and the site allocation at Brooklands Farm appears to be that significant volumes of traffic are using Pean Hill and Radfall Road. This is evidenced in **Figure 20** and **Figure 21** below which show the traffic flows on these links in the future base scenario (left) and then DS1 (right).

Figure 20 – Traffic flows on the A290 Penn Hill and Radfall Road in the AM Peak in FB & DS1

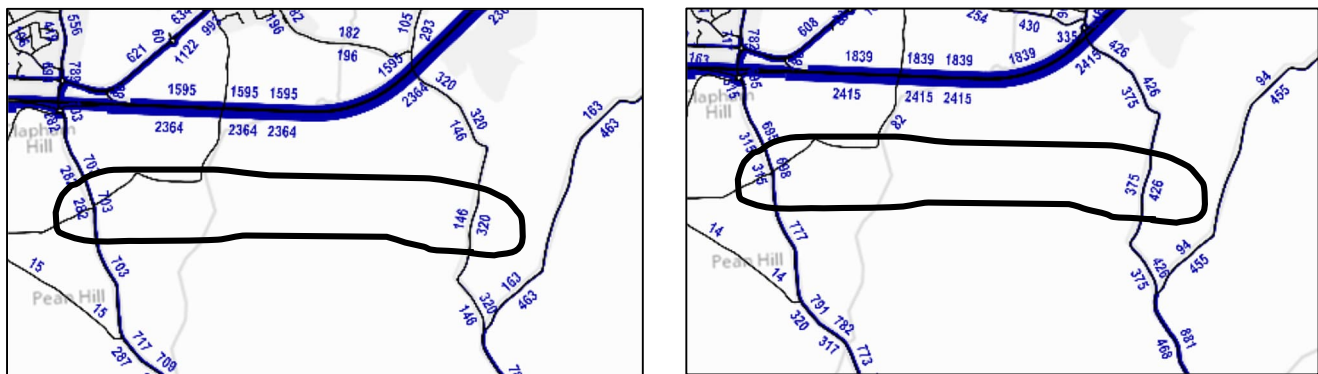
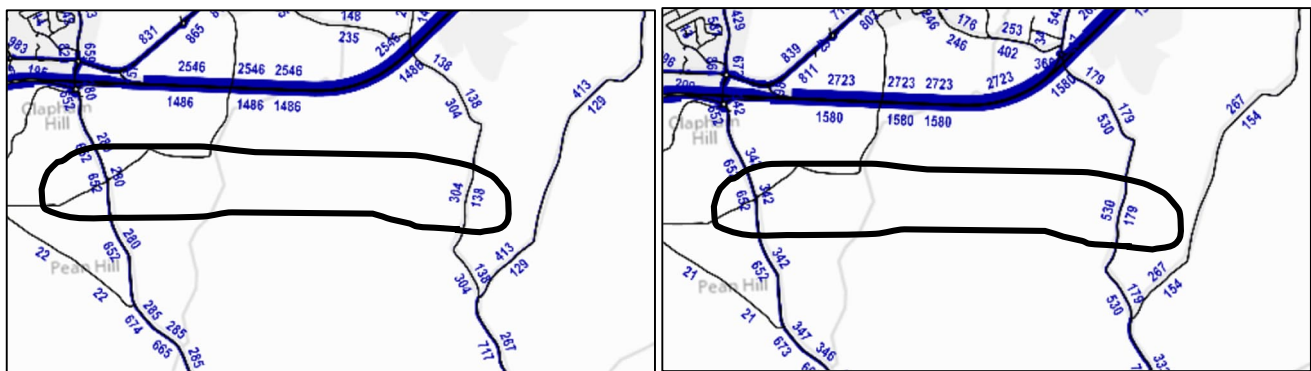


Figure 21 - Traffic flows on the A290 Penn Hill and Radfall Road in the PM Peak in FB & DS1



- 3.7.3 **Figure 20** and **Figure 21** show that traffic flows on Radfall Road increase by over 60% in both the AM and PM peak. Whilst there is a forecast increase on the A290 Pean Hill the level of growth is approximately 10% and 6% in the AM and PM respectively. It is clear that the strategic development at Brooklands Farm and the A299 slip roads associated with the development are a significant pull factor for the additional traffic flows.
- 3.7.4 WSP understand that KCC highways had significant concerns regarding traffic using Hackington Road instead of the A290 to head north towards the A299. Radfall Road becomes Hackington Road further south. This level of increase is therefore likely to be unacceptable and further infrastructure interventions are likely required to address this. Currently no such infrastructure interventions appear to be proposed.

Summary

- 3.7.5 The review of the Forecast Model Report has shown:
- The spatial pattern of growth proposed places significant growth in the south and east of Canterbury. The modelling undertaken shows inappropriate levels of traffic routing along rural routes which is unlikely to be able to be accommodated. This questions both the spatial pattern of growth proposed but also what infrastructure improvements would be required to deliver the growth proposed.
 - As a minimum traffic associated with the growth locations proposed should be re-assigned onto the main routes (A257, A28) so that the impact of this growth on the key corridors within and around Canterbury can be understood.
 - Scenarios DS2 and DS3 show that there is suppressed demand for the key routes (A257 and A28) and therefore doesn't demonstrate what impact the Draft Transport Strategy is likely to have on Canterbury.
 - Until such a time as the modelling is refined it is difficult to understand how the proposed spatial pattern of growth across Canterbury can be considered to be acceptable from a transport perspective.

4. Strategic Land Availability Assessment Review

4.1 Introduction

- 4.1.1 This section provides a review of the assessment of Site Reference SLAA319 within the Strategic Land Availability Assessment (SLAA)⁶.

4.2 Summary of Findings

- 4.2.1 The following provides a summary of the key findings set out within this section:
- The promoter team do not agree with the KCC Highways position that the Harbledown slip roads are necessary to develop Sites BCD. The conclusions reached in the SLAA that the site is not suitable on this basis are therefore unsound.
 - The modelling undertaken to date using the CTM has not demonstrated that there is a reliance on the A2 Harbledown slips to deliver Sites BCD. A package of highway mitigation has been proposed to accommodate the development on the highway network. In combination with the Vision-led Transport Strategy⁷ the impacts of the development on the highway network are not considered to be severe.
 - The scale of the development requires primary education provision and therefore the cost of re-development of the existing Blean Primary School is not entirely a result of the access strategy. The conclusion that the development would be unviable as a result of the requirement to re-provide the Blean Primary School is therefore unsound.
 - Whilst it is acknowledged that there are matters still to be resolved with KCC Highways to agree the transport strategy for Sites BCD these are not considered significant enough to prevent a recommendation for allocation of the site
 - The modelling undertaken to date does not rely on the mode shift assumptions set out in the transport strategy and therefore no reliance should be placed on this in determining the suitability of the site within the SLAA. The conclusion reached that the site is unsuitable on the basis of high mode shift assumptions is therefore unsound.

4.3 Review of Strategic Land Availability Assessment Summary of Site Submissions (February 2026)

- 4.3.1 **Table 4-1** sets out the comments made in the Site Assessment of Summary of Site Submission with respect to SLAA319 (UoK Sites BCD) and WSP's response on behalf of the UoK.

⁶ Draft Canterbury District Local Plan (2042/43) Regulation 19 Consultation 2026 Strategic Land Availability Assessment Summary of Site Submissions (February 2026) - Page 324-326

⁷ University of Kent, Sites BCD – Transport Strategy – WSP December 2025

Sites BCD

Response to Regulation 19 Local Plan – Transport

May 2026 | 70080896

Table 4-1 Review of SLAA Comments relating to Site SLAA319

Local Plan Status 2026 - Comment ⁸	WSP Response on behalf of UoK
<i>Representations from KCC Highways and National Highways have raised concerns regarding the design and delivery of A2 slip roads at Harbledown, which KCC consider are necessary in order to develop the site as proposed, as well as impacts on the wider highway network including Tyler Hill Road. No evidence has been presented by the site promotor to satisfactorily demonstrate that these concerns can be overcome. (Page 325 – Strategic Land Availability Assessment Summary of Site Submissions Feb 26)</i>	WSP have undertaken a significant amount of traffic modelling including scenarios with and without the Harbledown slips as well as with and without the development. The modelling results highlight that the development does not require the Harbledown slips to be included as part of the policy for the UoK site to ensure the development can be accommodated on the highway network. This is presented in the previously submitted UoK Update Regulation 18 Transport Appraisal Report and UoK - BCD Highway Assessment
<i>The site also relies on a secondary access point which requires the demolition and relocation of Blean Primary School. There are concerns that this abnormal cost will impact the achievability of the site, particularly given the high infrastructure costs associated with the delivery of essential new A2 slip roads at Harbledown. Viability evidence presented by the promotor to date makes an allowance for the relocation of Blean Primary School, however no allowance is made for the Harbledown slip roads. There are concerns that the access strategy and infrastructure requirements to facilitate the development would impact overall viability and the ability to provide affordable housing. (Page 325 - Strategic Land Availability Assessment Summary of Site Submissions Feb 26)</i>	As highlighted above in the response the development does not rely on the Harbledown slip roads to enable the development. As the access strategy requires the demolition and relocation of Blean Primary School this has and will be taken account of in the viability of the development. The development will produce a detailed phasing plan as part of any planning application which will present how the scheme will be built out and how the relocation of the Blean Primary School will be a part of the process.
<i>The additional evidence was reviewed and considered by council officers and KCC Highways, however this was not considered to sufficiently address concerns. KCC Highways have advised that there remain concerns regarding the impact on the highway network and that no detailed designs or updated capacity assessments have been provided to demonstrate how the impacts of the development would be mitigated. Furthermore,</i>	WSP have presented a series of updated modelling assessments similar to that of the DS1 scenario in the Transport Modelling Forecast Report. The modelling did highlight capacity concerns on the A290 corridor towards Canterbury city centre. WSP produced a Transport Strategy in December 2025, the document outlined a series of opportunities to reduce vehicular traffic on the A290 corridor into

⁸ Draft Canterbury District Local Plan (2042/43) Regulation 19 Consultation 2026 Strategic Land Availability Assessment Summary of Site Submissions (February 2026) - Page 324-326

Local Plan Status 2026 - Comment ⁸	WSP Response on behalf of UoK
<i>there is a lack of evidence to demonstrate that the proposed sustainable transport strategy is deliverable and would achieve the suggested levels of mode shift. The access strategy also continues to result in the loss of Ancient Woodland. (Page 325-326 - Strategic Land Availability Assessment Summary of Site Submissions Feb 26)</i>	Canterbury city centre, a summary of which is detailed below: ■ Provide a Park & Ride facility on the A290 corridor; ■ Introduce higher parking charges for staff and students at the university car parks; and ■ Develop a transport vision mode share based on three different scenarios high, medium and low. This document has been shared with KCC highways for review. The transport vision mode share alongside the reductions from the other opportunities on-site at the UoK forecast a reduction in traffic flows on the A290 compared to the without development scenario. As outlined in the Transport Strategy from December 2025 the site benefits from the bus services associated with the UoK which operate to Canterbury city centre. The other strategic sites in the south and east of Canterbury do not benefit from the same level of existing bus services and as such these services will only be sustained by those living at the new developments. The site at UoK will be able to further enhance the services already in existence by being able to support additional bus frequency and extended operating times. The UoK's proposed site allocation is therefore considered to be more deliverable from a bus based public transport strategy perspective than the other strategic allocation sites in Canterbury.

wsp

