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From: **Bown, Kevin** [REDACTED]
Date: Fri, 11 Sep 2020 at 15:19
Subject: FAO Local Plans Team: Highways England response (our ref #10653) re Canterbury City Council Our future district to 2040 – Issues Consultation
To: Planning@canterbury.gov.uk <Planning@canterbury.gov.uk>
[REDACTED]

For attention of:	Canterbury City Council
Consultation:	Our future district to 2040 – Issues Consultation
Highways England's Reference:	#10653

Dear Canterbury City Council Planning Team,

Thank you for your email of 1 July consulting Highways England regarding the above, seeking a response no later than 30 September 2020.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with plans and proposals that have the potential to impact the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109), in this location and its vicinity. In the case of the Canterbury Local Plan review, our primary concern is the impact of any planning documents or development management decisions on the M2/A2 corridor, and at the M2 Junction 7, west of Canterbury.

We have reviewed the online information provided within the 'Our future district to 2040' consultation. We note that at this early Issues consultation stage there is limited information or detail regarding quantum of development, location and traffic impacts. We offer the following general comments regarding the Local Plan process.

- We note that this is an early stage of the Local Plan review. As a result the consultation is high level and light touch. The detail of the location, scale and form of development will come later.
- We want to work with Canterbury City Council throughout the process

- In particular we want to agree step by step the modelling baseline and forecasts, and assess implications for the quantum, type and location of development both in terms of traffic generation but any other impacts on SRN.
- We would like to highlight that while the Government's Road Investment Strategy 2 (RIS2), includes studies regarding the M2 Junction 7 and Access to Dover Study, there is no guarantee at this time that these studies will become improvement schemes . Therefore the Local Plan should not place any reliance on any desired or assumed schemes. This means Local Plan led development for Canterbury will need to largely self-mitigate. Consequently, the Infrastructure Development Plan will be vitally important to demonstrate that sites and their associated mitigation are deliverable (right mitigation in right place at right time), funded (via the development or other guaranteed means) and suitably governanced (where multiple sites have a cumulative impact that requires a co-ordinated response).

We hope these comments assist and commit to continuing to work with the council and others as the Local Plan review evolves.

In the meantime, if you have any queries regarding our response, please contact us at PlanningSE@highwaysengland.co.uk.

Regards,

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Please note that for the foreseeable future we are all working from home. All meetings will be via telephone, Skype or similar. We will continue to seek to work to our statutory and other deadlines. In case of IT or other issues, as a precaution, please copy all emails to PlanningSE@highwaysengland.co.uk . Thank you.

We are mindful that everyone is different and everyone's circumstances may be different. We are sharing the following NHS principles

- **People are not 'working from home', they are 'at their home during a crisis trying to work'**
- **People's physical, mental and emotional health are far more important than anything else at present**
- **If people are currently less productive they should not try to compensate by working longer hours**
- **People should be gentle on themselves and others, not judging based on how they/ others are coping**
- **Individual and team success is not to be based on 'normal times' expectations**

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