



Our ref: #13469  
Your ref: Canterbury District Local Plan

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Dear Mr Thomas,

### **Canterbury District Local Plan - draft vision and options for the district**

Thank you for your email of 28 May 2021 inviting Highways England to comment on the Canterbury District Local Plan - draft vision and options for the district. We note from your follow-up email of 21 July that the end date for the consultation moved from 30 July to 9 August 2021.

### **Background**

Highways England have 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 we work 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.

We will be concerned with plans or proposals that have the potential to impact on the safe, reliable and efficient operation of the SRN, in this case, particularly the A2 and M2.

In accordance with national planning and transport policy and our operating licence, we are entirely neutral on the principle of development as it is for the local planning authority to determine whether development should be permitted. Therefore, while always seeking early and fulsome engagement with local plans and/or developers, we will simply be assessing the transport impact of plans or proposals and agreeing any necessary mitigation.

Therefore, future development proposals that would impact the SRN network would need to be robustly assessed and mitigated via the appropriate channels.

In progression of Local Plans, we look to agree the following:

- Modelling methodology
- Baseline modelling i.e. to demonstrate that the model accurately predicts current flows
- Forecast modelling i.e. to assess the impact of proposed development; as appropriate, at various trigger points during the lifetime of the Plan; and at the end of the Plan period; and, if required at full build out if that occurs after the end of the Plan period
- Outputs and outcomes of modelling, demonstrating, as appropriate, what mitigation will be required, in what form, where and when
- It should be noted that a suite of modelling may be required that includes strategic modelling covering an area at least one major junction beyond the district boundary (for Canterbury we require the cordon to extend to M2J6 and to A2/A260), localised network modelling where several links/junctions are close together and individual junction modelling
- A DMRB complaint Merge/Diverge assessment may also be required for relevant junctions.
- The design of any mitigation, to at least preliminary design stage (including any required Road Safety Audits and Walking, Cycling, Horse Riding Assessments) and in full compliance with the Design manual for Roads and Bridges
- The framework setting out the responsibility, funding, timing and governance for any mitigation delivery. It must be assumed that the local plan will have ultimate responsibility unless otherwise agreed by parties. It should not be assumed that Highways England will have any funding responsibilities.
- Any required Monitor & Manage framework, aimed at delivering mitigation or other infrastructure. Any M&M framework must be based on “worse case scenario” modelling and mitigation. It must set out details of responsibility, funding, timing and governance for any mitigation delivery. It must be translated into policy and conditions on applications that clearly set out that if X development is to be occupied, Y mitigation must be in place unless Z M&M is agreed by Highways England that demonstrates an alternative form, level or location of mitigation is justified.

All of the above can be set out in a Statement of Common Ground (SoCG) between the Council and Highways England that will track progress towards final agreement on all relevant matters that should aim to have been reached prior to the Local Plan Examination.

While, ideally all of the above should be agreed prior to the Submission of the Local Plan, we recognise that this is not always possible. However, all parties should work towards all matters being agreed and reflected in a SoCG by the start of the Local plan Examination.

### **Existing network conditions**

In the peak hours we note that the M2 Junction 7 Brenley Corner junction often operates close to or at capacity. Additionally, previous Transport Assessments have indicated that the Harbledown merge and diverge and A2/A28 Wincheap junctions will

in future likely to be operating close to or at capacity during the peak hours. Additionally, the A2/A2050 Bridge Junction will most likely need mitigation with or without the Mountfield Park development, noting that the development itself mitigates via the creation of a revised junction.

### **RIS schemes**

Within the Road Investment Strategy (RIS) 2, there were two schemes in the vicinity of Canterbury that have been identified for RIS3 Pipeline assessment. They are:

- A2 Brenley Corner (M2/A2 junction 7) – upgrading the A2 Brenley Corner junction near Faversham.
- A2 Dover Access – upgrading sections of the A2 to improve traffic flow and resilience between Lydden Hill and Dover.

It is important to note that at the time of writing there is no commitment to delivery of either of the above schemes. Commitment to delivery of successful proposals will be made through the publication of RIS3.

Therefore, the Local Plan must ensure that it fully mitigates its impacts.

### **Preferred Options Consultation**

We have reviewed the preferred options consultation information and the Kent Countywide Model – Forecast Report (Canterbury Local Plan Review) provided and have the following comments.

### **Draft strategic objectives**

The proposed draft strategic objectives, particularly those that aim to support and develop a sustainable local transport network, with less reliance on vehicle trips, the delivery of critical infrastructure to support development and the delivery of development which encourages low carbon lifestyles are consistent with the sustainable transport principles of Circular 02/2013 and the National Planning Policy Framework (NPPF2021).

### **Preferred growth option**

Focusing growth in Canterbury city with limited development at coastal towns and villages will encourage growth in more sustainable locations in transport terms and is consistent with the sustainable transport principles of Circular 02/2013 and NPPF.

In addition, we should be consulted on any proposals to upgrade the A28, particularly at its junction with the A2 Dover Road south-west of Canterbury, and the potential new links at the A2/A2050 junctions west and south-east of the city. Any proposed schemes at these locations would need to be agreed with Highways England and assessed appropriately. The requirement for any schemes should be supported by a robust evidence base.

## **Canterbury focus A and B growth options**

As noted above, focusing growth in Canterbury city with limited development at coastal towns and villages will encourage growth in more sustainable locations in transport terms and is consistent with the sustainable transport principles of Circular 2/2013 and NPPF. Investment in local transport infrastructure will also encourage fewer private vehicle trips and more sustainable travel patterns.

However, also as noted above, we would comment that we will need to be consulted on any proposals to upgrade the A28.

## **Coastal and rural focus growth options**

We note the option considering growth focused outside of Canterbury city. Subject to the level and location of that development being sufficient of itself and in combination with existing settlement patterns, it is possible that it could support sustainable transport modes and travel patterns/choices. In this way it could comply with the sustainable transport principles of Circular 2/2013 and NPPF. Significant investment in public transport infrastructure would be required in order to deliver sustainable growth at more dispersed locations. In the alternative, poorly located or insufficient levels of development could exacerbate and perpetuate any existing unsustainable travel patterns and behaviours.

## **New freestanding settlement growth option**

We consider that growth focused in a new freestanding settlement would have the potential to have significant impacts on the strategic road network (SRN) at M2 junction 7 and the A2 junctions with Canterbury Road, London Road and the A2050. Care would need to be taken to ensure that any new settlement, by virtue of its scale and location, is genuinely sustainable in transport terms, and not a development predominantly accessed by car.

## **Housing and new communities**

We consider that the preferred options regarding maximising brownfield regeneration opportunities, providing higher density developments in urban locations, ensuring that essential services are highly accessible from new developments, providing support for strategic infrastructure to support development, and setting clear requirements for infrastructure to ensure timely delivery are consistent with the sustainable transport principles of Circular 2/2013 and NPPF.

## **Employment and the local economy**

We consider that the preferred options proposed for employment and the local economy, particularly measures to require new employment and strategic housing developments to provide sustainable transport connections and connectivity infrastructure that reduce the need to travel are consistent with the sustainable transport principles of Circular 2/2013 and NPPF.

## **Movement and transport**

We welcome the proposal that all measures for movement and transport should encourage active travel, greater use of public transport, a transition to zero emission vehicles and restrictions on parking in sustainable locations. And that all major developments should be supported with robust and detailed Transport Assessments and Travel Plans based on a robust evidence base that encourage active and sustainable travel.

### **Kent Countywide Model – Cordon for Canterbury Local Plan Review**

#### **a) Base model**

Highways England are generally content with the calibration and validation of the model based upon the information provided and coupled with the approach to the construction of the Kent Countywide Model from which it is derived. However, more information is needed relating to the matrix estimation application before we are able to approve the model for Local Plan assessment purposes.

The reporting partially reflects the changes in terms of trip ends and trip length distributions. In line with Webtag M3.1 Table 5, Highways England need to see further reporting of changes based upon matrix zonal cell values and sector to sector level matrices.

**ACTION:** Further information is needed relating to the matrix estimation application and the significance of matrix estimation changes. In line with Webtag M3.1 Table 5 Highways England need to see further reporting of changes based upon matrix zonal cell values and sector to sector level matrices.

#### **b) Forecast matrix development – trip rates**

We have reviewed the trip rates presented by Jacobs that have been used to produce the development trip matrices. Following an independent analysis in TRICS, the trip rates for employment (office and business park) are low and may underestimate the level of vehicle trips generated by the Local Plan development. Therefore, the TRICS output reports used need to be provided in order to determine the suitability of the TRICS analysis undertaken.

**ACTION:** For the employment land uses, the TRICS output reports are required for review.

#### **c) Journey time analysis**

We note that the seven key routes identified for journey time comparison between the modelled LPR option outputs and the forecast baseline do not include any routes on the SRN. The journey time analysis needs to be extended to include routes on the SRN.

**ACTION:** The journey time analysis needs to be extended to include routes on the SRN

#### **d) Flow and Level of Service (LOS)**

The level of service (LOS) plots presented by Jacobs do not always show junction 7 of the M2, and never show M2 Junction 6. This information is required for all development options. However, the main LOS impact is on the A2/A28 junction at Thanington. Options 1, 3 and 4 take the junction from Level E in the baseline to Level F in each Option.

In order to identify the impacts of the options, it is required that tables of flow increases (absolute and % difference) at key locations on the SRN are provided. It is also required that plots and tables of changes to LOS at key SRN junctions are provided.

**ACTION:** The LOS information is required for M2 J6 and J7 for all development options.

**ACTION:** Tables of flow increases (absolute and % difference) at key locations on the SRN need to be provided. It is also required that plots and tables of changes to LOS at key SRN junctions are provided.

#### **e) Committed highway improvement schemes**

It is noted that a number of committed highway improvement schemes are included within the baseline and Local Plan Options scenarios. The schemes included accord with our own understanding, but will need to be updated as the plan progresses.

#### **f) Geographical extent of modelling**

We may also require assessments further afield along the A2 or M2. In the first instance we require that Local Plan peak hour flow information is provided for the A2 main carriageway to the A2/A260 junction and M2 J6. We can then comment further on the geographical extent of the modelling required.

**ACTION:** As set out above, peak hour Local Plan traffic flow information is required in order to confirm the geographical extent of the traffic modelling analysis.

#### **g) Further modelling**

Please note that once the impacts of each growth option are accepted by us, localised junction capacity modelling (and where applicable, merge/diverge assessments) at locations on the SRN will need to be undertaken. The scope of these assessments will need to be agreed before they are carried out.

**ACTION:** In due course, localised junction capacity modelling (and where applicable, merge/diverge assessments) will be required.

## **Next steps**

You will note that Highways England require further information and clarifications before we can agree the conclusions of the strategic modelling analysis carried out to date.

Once the impacts of each growth option are accepted by us, localised junction capacity modelling (and where applicable, merge/diverge assessments) at locations on the SRN will need to be undertaken. The scope of these assessments will need to be agreed before they are carried out.

## **Conclusions**

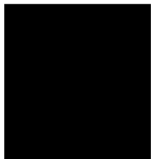
Highways England are committed to continuing to work closely with Canterbury City Council in order to ensure that traffic impacts on the SRN are accurately identified and assessed, with the development of appropriate mitigation measures as required.

Under the terms of the duty to cooperate, our expectation is that Canterbury City Council will coordinate with Swale Borough Council and Dover District Council with regards to their emerging local plans and the potential for cumulative impacts.

Our aspiration is for all technical assessment and appropriate mitigation for the SRN to be agreed prior to the formal submission of the plan. Towards this aim, once you have had opportunity to assess the various representations received, please feel free to contact me to discuss and progress matters.

I hope that our responses assist, but if you have any queries please contact me via [planningse@highwaysengland.co.uk](mailto:planningse@highwaysengland.co.uk).

Yours sincerely



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