



# REQUEST FOR INFORMATION ON DDC LOCAL DEVELOPMENT PLAN



Fredville Park Nonington 2020

prepared by  
Nonington Parish Council  
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# RFI TO DDC ON THE DRAFT LDP

Following a review of supporting evidence and 3<sup>rd</sup> party research, we would like to clarify a number of points we were unable to answer from the local plan documentation and evidence. We have provided positioning information on questions where required and request DDC respond to the specific questions asked individually using the number system below.

## i. POPULATION

### **BACKGROUND**

The LDP allocates 11920 dwellings in Dover's to meet local housing needs resulting from population growth and change 2020-2040 based on the standard method for assessing local housing need (LHN) using outdated ONS 2014-base population projections designed exclusively to deliver the Government's objective of 'significantly boosting the supply of homes.

We understand population projections underpin the objectively assessed need for housing. We understand that they are not forecasts and reflect the information inputs, assumptions and evidence used. We understand their reliability reduces with time. We mindful of the risk associated basing a plan on 2014 base data without considering the published 2016 or 2018 data or the impacts of the pandemic or Brexit.

We are confident DDC will have considered a range of realistic population scenarios based on the latest projections and legitimate variations and will be happy to share the information inputs, assumptions and evidence for making any projections supported by their robust evidence base.

- a. What proportion of the district's total population growth 2020-2030 does the LDP's population projections attribute to natural growth of the baseline population?  
(Note – Where figures for the time period don't align to the available data please provide the nearest comparable. For example for (a) above, 2020-2040 figures are fine if that is what you have).
- b. What proportion of the district's total population growth 2020-2030 does the LDP's population projections attribute to net inward migration from outside the district?
- c. What is the difference between the LDP migration figure in answer a) above and the net inbound migration figure provided in the most current ONS projections for the Dover District from Subnational population projections for England 2018 based)?
- d. What % of total 2020-30 net inbound migration figure provided for (B) above does DDC LDP population projection modelling project to be from social housing relocation from other Local Authority placements from outside the area?
- e. Referencing Dover's migration flow data and housing search patterns, excluding Whitfield, Aylesham and Elvington, what impacts does this LDP model inbound migration will have on for the housing supply and affordability in the rest of districts coastal towns and villages 2020-2040?



In 02/19 the UK government stipulated use of 2014-based projections as the demographic baseline for the LHN standard method. The LHN figure is further distorted and skewed upwards by the changes to the 2019 NPPF parag 35a.

- f. Dover Strategic Housing Market Assessment Partial Part 2 update 2019 Point 24 identifies the ONS 2016 figures reduced the national numbers of houses required by 15% from the 2014 figures. What is LNH number for Dover calculated using the ONS 2018 base sub national population projection for local authority areas?
- g. Using ONS 2014-base what % of the 11,920 dwellings are allocated specifically to deliver the 2019 NPPF parag 35a requirement accommodate unmet need from neighbouring areas in this local plan?
- h. NPPF 2019 require an LDP to ensure '*Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements*'. A 2020 analysis of the latest ONS data published by Cambridge University's Public Policy Institute Cambridge University and 2021 King's College London research paper into the latest ONS UK employment data both estimate the biggest drop in UK population of over 1 million (the biggest since WW2) because of Brexit and Covid-19. How do the demographic modelling assumptions in the LDP accommodate the projected impact of Brexit and Covid-19 on the UK and Dover demographics and migration?
- i. DDC's website states 'The population is forecast to increase by 10.7% between 2018 and 2038, which would increase the population size to 129,400'. This is an average of growth of 620/annum or 6,200 / decade. ([Source data](#)). Using mean occupancy density and the 596 - 630 dwellings / year LDP targets we get 14,006 - 14,805 population growth in 10 years. **This is 220% - 240% higher than you own quoted population projections.** (We understand that they are not forecasts and reflect the information inputs, assumptions and evidence used.)

**Q** Is the 129,400 figure on DDC's website still accurate? If not what is the revised growth prediction? (Please indicate data source and year)

- j. The 2018-based ONS local authority population projections note housing policy is an engine of inbound migration. Build and they will come. DDC's LDP's 'overarching vision' for Dover District in 2040 is built on encouraging inbound migration: 'Dover District in 2040 will be a destination of choice for people of all ages to make their home'.

What % of total net inbound migration to Dover 2010-2020 have DDC calculated were a direct result of DDC's LDP housing policies?

- k. What % of total net inbound migration to Dover 2020-2040 do DDC estimate will directly result from the housing allocation in this draft LDP?
- l. Current UK mean dwelling occupancy in 2.4. In Dover district it is 2.35. What does this LDP's demographic modelling assume it will be in 2025 and in 2035?



## ii. DWELLING DISTRIBUTION

### BACKGROUND

Government guidance states that LDP should be 'written in plain English to help ensure that it is easily accessible to local communities, to avoid them becoming disengaged with the process'.

The Sustainability Appraisal Overarching Strategy (Part1) identified 3 growth options for dwelling distribution. This was expanded to 5 spatial options in the draft LDP. DDC selected a hybrid of 3 of the 5 options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). To be 'sustainable', this 'hybrid' requires the district settlement hierarchy to be altered by DDC (Elvington) and for a geographically separated greenfield new town development in Whitfield to be presented as 'Dover' using an administrative unit 'for planning purposes' and for the cumulative and synergistic effects of traffic levels, modal split and highways environmental impact to be excluded from the assessment.

DDC's 2020 Local Plan (Reg 18) Sustainability Appraisal states 'The continued national policy emphasis on sustainable development means that *'housing development should, where possible, be concentrated in the three urban centres of the district, Dover, Deal and Sandwich'*. and should *'maximise the development of brownfield land.'*

However, we have been unable to locate the population / settlement, the proportion of LDP allocation per settlement and the Greenfield v's brownfield ratio across the district and by settlement.

The inconsistent use of extant and the presentation of the distribution of housing growth in the District by settlement type are problematic. For example:

- Sandwich - a town of 5000 people and the highest house prices in the area - is allocated 324 dwellings in the LDP.
- Aylesham a former mining 'village' with some of the lowest house prices in the district and a population of 4000 gets 1,700 dwellings.

However, the LDP evidence combines them to form '*Sandwich; Aylesham (Rural Service Centres) with 19.83% of housing allocation'*. Similarly the LDP claims that Dover gets 47% of all housing. Take out Whitfield Greenfield development and this figure drops to 9%.

This conflation of separate settlements by settlement type is not just academic. It is being leveraged to 'prove' sustainability of the proposed LDP. For example, to make the employment case for the concentration of development in Aylesham, the 'independent' Sustainability Appraisal states <sup>(4.7 SA 3)</sup>, '*The settlements of Dover and Sandwich experience the highest level of inward commuting in the District. Dover, Sandwich and Aylesham contain the highest number of employment sites.'*

Over 10 miles and an economic universe away from Aylesham, Sandwich's employment – mainly at Discovery Park - is being cynically leveraged to justify the employment case for 1700 dwellings in Aylesham (inc extant).

We are concerned this skews supply and demand visibility, disguising the fact that insufficient housing is allocated where the population growth is projected.



- i. Can you clarify:
  - a. What % of the LDP 11920 dwellings are in strategic Greenfield developments?
  - b. What % of the 11,920 dwellings are in:
    - i. The Aylesham and Elvington ward?
    - ii. The Whitfield electoral ward?
  - c. What population growth does the LDP project for each of these wards over plan period?
- ii. What % of all sites are brownfield?
- iii. What % of brownfield sites in the LDP are extant?
- iv. Broken down by settlement, what % of total LDP brownfield sites in the LDP are in (a) Dover (DOV \_\_\_ sites excluding Whitfield), (b) Sandwich and (c) Deal?
- v. The Dover Strategic Housing Market Assessment Partial Part 2 update December 2019 states that, 'For the purposes of progressing the draft plan, 630 dpa should be regarded as the minimum housing number'. Why doesn't the LDP use this number?
- vi. Garrington's 2021 research into the best the areas to buy a house in Kent place 3 of Dover District Towns in Kent's top 50 locations, with **Dover** at 26th, **Sandwich** 12<sup>th</sup> and **Deal** the 9th best spot in Kent to buy.

As people move into these towns, it increases pressure on the supply of houses pushing up prices. The less supply, the higher the price, the more likely it is that locals are will be priced out of their towns and villages.

By allocating LDP dwellings where, the LDP can mitigate this impact. We assume DDC have formulated policies to accommodate net inbound migration into Dover, Deal and Sandwich over the next decade. However, we haven't been able to locate these. **Using Deal as an example, the town has 26% of the district's population but only 2.65% LDP dwellings. It the 9<sup>th</sup> most attractive location home purchase and for 2<sup>nd</sup> homes.**

- i. What are DDC's 5 year and 10 year demand and supply projections for Deal's housing market?
- ii. What is DDC policy to mitigate residents being priced out of the town?



### III. SETTLEMENT HIERARCHY & BOUNDARIES

- i. The LDP's non-strategic site allocation divides sites in sites in Dover (**DOV** \_\_ \_\_) and sites in Whitfield (**WHI** \_\_ \_\_). The strategic sites classes Whitfield as Dover. Why the discrepancy?
- ii. What date was Whitfield added in to the Dover Urban Area?

In December 20 Elvington was reclassified. This facilitated it's inclusion as a strategic site in the LDP. The LDP is required to demonstrate that development is placed in the most sustainable area and that sustainable transport provision is modelled at the earliest opportunity.

The methodology employed in Dover Rural Settlement Hierarchy 2020 SA to demonstrate sustainable transport is limited to establishing the proximity of new housing to a bus stop and / or train station. That is it. No analysis of commuting patterns, baseline traffic, modal split or journey to work data was considered. Neither was ONS Travel to Work Census data for Elvington shows 89% journeys are in private vehicles of while only 2.5% were by bus and 3 % by train. Evidence for Greenfield development car-dependency and the commuting pattern modelling in the Local Plan (Reg 18) Sustainability Appraisal 4.56 and 4.57 were not referenced in the report.

If the purpose of Dover Rural Settlement Hierarchy 2020 is make a decision based on impartial evidence on transport sustainability, then these omissions are hard to account for. We are mindful of Ministry of Housing, Communities & Local Government 2020 LDP guidance advice on the importance of contextual data such as travel to work areas and that evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively.

Further informed by DM Policy 29, SA Part1 1.5 and NPPF parag 84, 102 a) + d), we believe a full travel plan with traffic modelling should have been considered before proposing Elvington as a strategic site in the LDP. However, we are not planners and welcome you clarification on the following:

**NOTE:** *Many of these issues are related to sustainable transport. Because they are directly relevant to the reclassification of Elvington & Eythorne, they are listed below.*

- iii. How do DDC believe their approach in Elvington meets the policy framework requirements on DM Policy 29, SA Part1 1.5 and NPPF parag 84, 102 a) + d).
- iv. Which of the following data sources were used Dover Rural Settlement Hierarchy 2020 reappraisal:
  - ATC data? Y/N
  - SERTM data? Y/N
  - Nomis data? Y/N
  - DataShine ? Y/N
- v. AA Route planner identifies Adelaide Road northbound (Mill Lane and Holt Street) at the quickest route to northbound A2 (M2 / M25/M26). In the sustainability assessment for site inclusion, what % of new site traffic does DDC assume will go to the A2, M2, M26 and M25?



- vi. In accordance with **NPPF parag: 84, 108 c and 109 + DM Policy 29**, what increase in traffic on Tye Wood and Mill Lane would DDC identify as constituting a severe cumulative impact and generating *inappropriate levels of traffic generation or unsuitable traffic movements*' (This can be expressed monthly / daily / peak hour as either % increase or total volume).
- vii. Local Plan (Reg 18) Sustainability Appraisal states *'The scale and distribution of growth dictated by the Local Plan will influence carbon emission generated by resident and worker's need to use private vehicles'*. With reference to traffic data, travel to work areas, modal split and projected cumulative levels of traffic generation on the non-primary and secondary route network (DM Policy 29) and A2 junctions projected from the proposed Elvington Development, please clarify how the 350 houses in Elvington will meet SA objective SA4.4: to address road congestion?
- viii. Local Plan (Reg 18) Sustainability Appraisal identifies the need for a TA on Elvington's sites. Given the evidence gaps, the settlement hierarchy changes and its inclusion as strategic site, why do DDC believe a full travel Plan is not required? (It should be).
- ix. A village is defined as having between 500 and 2,500 inhabitants. Based on this LDP, Aylesham will increase size from 2011 base by 225% to 4,500 dwellings with a population of 10,500. Are DDC going to reclassify it as a town? If not why not?

#### IV. SUSTAINABLE TRAFFIC

Aylesham is the 2<sup>nd</sup> largest growth hub in the LDP. Including extant, a further 1700 dwellings are proposed in the plan period. Despite projecting 'large increases in (traffic) flow', for Aylesham, the traffic data in the area north of the A256 was modelled in '**significantly less detail**' by WSP. In terms of the 2 strategic sites the entire traffic assessment is based on ATC data from just one road, the B2046, and some manual counts in Elvington.

WSP's report offered no conclusions on the area north of the A256 as it was outside the DDTM area. WSP explicitly recognise the porosity between traffic from B2046 and the local roads yet no data-based analysis of rural road capacity or cumulative traffic impact have been provided. Neither the Aylesham s106 ATC data nor the SERTM mobile GPS data have been considered in modelling Aylesham's or Elvington's traffic impacts.

Dover District Council Draft Dover District Local Plan (Reg 18) Sustainability Appraisal detailed the District's experiences net out-commuting overall, particularly in the north and west Canterbury, Folkestone, Ashford and Thanet are all commuting destinations. The settlements of Dover and Sandwich experience the highest level of inward commuting in the District. Dover, Sandwich and Aylesham contain the highest number of employment sites. – Referenced in the SA, this crucial data has not informed the SA methodology or the LDP site allocation.

The Planning Advisory Service guidance on good plan making advises that, when appraising strategic options, Sustainability Appraisal should consider if the plan likely to displace environmental problems or lead to increased traffic generation in adjacent areas. This hasn't happened.



How did DDC deliver on their commitments in **Sustainability Appraisal of Growth Options set out in the Dover District Council Local Plan Topic Paper: Overarching Strategy (Part 1) point 1.5**. Specifically to assess growth options in terms *its likely effects on environmental...using available evidence and considering factors such as: Commuting patterns, Transport infrastructure, traffic congestion (and related air quality and carbon emissions issues)*?

Please identify supporting evidence on commuting patterns, transport infrastructure, traffic congestion, air quality and carbon emissions issues for 1) Aylesham and 2) Elvington.

1. With less than 8% of Dover's population in 2011, the Aylesham and Elvington ward have been allocated 18.5% of the proposed housing in the LDP. With no detailed traffic data how do DDC propose to meet obligations under NPPF parag 102 a) and d) that (*Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:a) the potential impacts of development on transport networks can be addressed; d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account*) ?
2. The SA states Elvington has 'relatively good access to existing local rail and bus services'. We disagree but are interested in real world evidence for improving public transport uptake.

Referencing recent transport modal analysis on the completed units in Whitfield (required by Whitfield 2010 Sustainability Appraisal) and at Aylesham, what % of Elvington and Eythorne journeys to work are DDC projecting will be on public transport in 2025 and 2030?

3. DDC preferred option on Travel Plans, Travel Assessments and the subjective definition of 'severe' and 'unacceptable' cumulative traffic impacts provides an effective veto on objections based on highways impacts. The LDP (Highway Network and Highway Safety) states:
  - a. *'It is the Council preferred option..'* in relation to TP's and TA's
  - b. *'the Council's preferred policy option'* in relation to subjective definition of 'severe' and 'unacceptable' cumulative traffic impacts.

**Preferred policy option means other policy options exist. What are the other options for a) and for b)?**

4. Assuming preferred option adoption, using the proposed Aylesham expansion as an example:
  - c. With Strategic Policy 5 (11) and Strategic Policy 6 (13), will DDC be able to dictate whether Travel Plans or Traffic Assessment are required (or not) on an application by application basis? Our concern that this would 'balkanise' traffic impacts and s106 contributions.

(We recognise Master Plan (MA) provides SA guidance but note divergences from both the Whitfield Urban Expansion MA and Aylesham Garden Village MA). .

- d. We note DDC's preference for s106 (rather than the proposed levy in Planning for the Future White Paper), however, in the event the levy replaces s106, how will this impact on scenario (a) above?



5. In accordance with **NPPF parag: 84, 108 c and 109**, what increase in traffic on Holt Street & Easole Street (contributed to by Aylesham and Elvington development) would constitute a severe cumulative impact? (This can be expressed monthly / daily / peak hour as either % increase or total volume).
6. **DM Policy 29:** The Highway Network and Highway Safety states '*Traffic generated by development should normally be targeted towards the primary and secondary route network in the District. Other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements*'.

What increase in traffic on Holt Street & Easole Street resulting from Aylesham and Elvington would constitute inappropriate levels of traffic generation or unsuitable traffic movements? (This can be expressed monthly / daily / peak hour as either % increase or total volume).

7. **DM Policy 45:** Conservation Areas: undertakes '*not to generate levels of traffic, parking or other environmental problems which would result in unacceptable harm to the character, appearance or significance of the Area*'.

Specifically in relation to Easole Street Conservation Area and Fredville Park please quantify the traffic levels required to constitute 'unacceptable harm'.

The absence of any empirical benchmark data and or methodology in response to questions 5.5, 5.6 and 5.7 would serve to underline the danger to the rural highway network posed by 5.3 above.

## v. CLIMATE CHANGE & ENVIRONMENTAL IMPACT

- 5.1 This LDP places climate change and carbon neutrality front and centre of its policy commitments, stating this '*Local Plan supports and helps to deliver the Council's approach to the climate change emergency through a series of policies which aim to ensure that development proposals, which come forward between now and 2040, mitigate against and adapt to the effects of climate change*'.

**Over 70% all extant and proposed housing projected over the LDP period is on new build out of town (see 6.2 below) Greenfield sites.** The environmental impact of Greenfield developments are well documented. Greenfield sites build at low housing densities and are a wasteful use of land; new roads, schools, health care, electricity, water, sewage and other carbon heavy services undermine the Council's zero carbon action plan. The evidence shows that even those developments near public transport have high car dependency.

We have been unable to reconcile how the housing type and distribution in the draft LDP aligns with the LDP's overarching commitments on climate change and carbon neutrality?



- I. Referencing the information inputs, assumptions and evidence used, what is DDC per dwelling whole lifecycle carbon footprint for Greenfield sites (/m3)?
- II. Referencing the information inputs, assumptions and evidence used, what is DDC per dwelling whole lifecycle carbon footprint calculation for brownfield sites? (/m3)

5.2 We recognise that for 'planning purpose' this LDP treats Whitfield as Dover. However, from an SA / EIA perspective there is evidence to suggest this is misleading. A spatially distinct settlement 6.4 km and an hour's walk from Dover's train station and shops, Whitfield is socio geographically a separate new town development on a greenfield site with separate out town shopping.

- The Whitfield Master Plan states: 'the Dover Transport Strategy recognises 'the severance of Whitfield by the A2 and its walk time from town centre and local topography'.
- The 2020 Plan Sustainability Appraisal stated (4.50): 'The allocated Whitfield Urban Extension is of a scale large enough to be described as a new settlement.'
- The Whitfield 2010 Sustainability Appraisal recognised the risk of increased car dependency and stated: '*There will be a need to closely monitor delivery of proposals, as it will be critical that a culture of reduced car-dependency is enshrined from the outset*'.
- The 2020 Plan Sustainability Appraisal stated (6.4): Housing growth is concentrated in '..Dover and neighbouring Whitfield.'
- The non-strategic sites in the LDP are divided into Whitfield (WHI \_\_) and Dover (DOV \_\_\_)

#### QUESTIONS

- I. Can DDC share the empirical evidence of travel to work, bus usage etc. from the car use monitoring stipulated in 2010 Sustainability Appraisal?
- II. Can DDC provide similar transport mode / journey data on car usage v's public transport based on the completed and occupied units in Aylesham to support their claims to sustainable development in Strategic Policies 5 &6?

5.3 Dover District Council Draft Dover District Local Plan (**Reg 18**) Sustainability Appraisal C2. States 'Specific areas of Dover have particularly low levels of car ownership and in some cases, higher levels of unemployment. As such, residents in these areas including the elderly are becoming increasingly reliant on local bus services. Inappropriately located development without a good range of sustainable transport links could exacerbate people's access to services, facilities and employment.

- What is the level of car ownership in Whitfield?
- What is the mean car ownership across the whole Dover Urban Area?



## 7 ECONOMIC & EMPLOYMENT

7.1 Whitfield social housing provision. In 2010 DDC waived the usual 30 per cent affordable housing requirement. What % of total LDP affordable housing provision 2020-40 is in:

- I. Whitfield?
- II. Aylesham?
- III. Elvington?
- IV. Sandwich?
- V. Deal?
- VI. Dover – (excluding Whitfield)?

7.2 Aylesham Employment

- I. WSP's report models 529 jobs at the Snowdown Colliery site. The Dover Economic Growth Strategy (2021) predicts 470. Which is correct and why?
- II. On the Snowdown Colliery site the landowner confirms they have an existing tenant and this is not up for renewal or change. Given the requirement for a LDP to be 'realistic about what can be achieved' and 'the need to work with landowners at an early stage in the plan-making process', what evidence is there that the employment numbers assigned to the Snowdown Colliery site are deliverable?
- III. If the Snowdown Colliery site is not viable in the time period, should these employment number be removed from the LDP?
- IV. WSP's report models 484 jobs at the Aylesham Development area. This is the only Local Plan (Reg 18) Sustainability Appraisal strategic employment site in Aylesham'. Subject to clarification on (ii) above, it is the only viable employment site in Aylesham.  
  
Suitable site for mixed use, B1 and potentially some B2 due to close proximity to residential uses this 8,500sqm site is extant. What mix of B1c and B1a and B2 is being projected for this development?
- V. Given likely achievability of employment-led development in Aylesham Development area, what proportion of B1a is achievable, taking into account market signals and B1a space in Aylesham to date?
- VI. Parag 4.7 SA 3 Employment states, '*The settlements of Dover and Sandwich experience the highest level of inward commuting in the District. Dover, **Sandwich and Aylesham contain the highest number of employment sites.*** This conflation of separate settlements by settlement type to make the sustainable employment case for the development in Aylesham is clearly erroneous and misleading. Please, therefore, clarify the number of employment sites in
  - a. Sandwich?
  - b. Aylesham?



- VII. Please clarify how Aylesham performs against the SA3 objectives based exclusively on viable employment site allocation in Aylesham without Sandwich?
- VIII. Based on you answers (i) – (vi) above, please clarify that whether this provides sufficient on site employment provision on the proposed LDP Aylesham expansion (inc extant) to be ‘sustainable’?

## 8 VARIOUS

7.1 Where DDC is both landlord and planning authority what processes do DDC put in place to separate the independence LPA oversight function on an s106 process from the LA’s commercial interests?

7.2 The LDP states, ‘Once the Local Plan for the District is adopted, the whole Plan Viability Assessment will become the reference point for any future viability assessments submitted through the Development Management process.’

The authors of Plan Viability Assessment confirm, their assessment: ‘does not have site specific estimates of the strategic infrastructure and mitigation costs for the Strategic Sites’. Do DDC see this as an obstacle to the adoption of their preferred approach as set out above?

7.3 Dover District Council Draft Dover District Local Plan (Reg 18) Sustainability Appraisal, fails to include Fredville Park. The LDP specifically references it. Is this an error in the SA?

7.4 As AYL003 was already one of the weakest performing site options in and around Aylesham and Sandwich in the SA, in light of the gaps in the sustainable transport evidence used, the errors in the employment evidence and the questionable decision in the SA methodology to combine Sandwich and Dover to gerrymander the SA results, can AYL003 still be classed as sustainable?



## RECOMMENDATIONS

The LDP contains several thousand pages of well-presented reports, policies and supporting information. However, there is a high level of assumption interdependency, what WSP, call the **'uncertainty log information'** when describing the housing and employment numbers DDC provided.

This is the biggest, most important consultation the council carries out. The proposed changes to the planning system make this the primary chance for communities and stakeholders to have democratic involvement. To rush it through is simply wrong. People need the chance to fully understand what the plan means for them and their communities and have ample time to respond.

It is unrealistic to expect residents and parish councils to absorb such an enormous amount of information in such a short time, especially if the information is changing, incomplete or inaccurate. Regardless of the many issues with the Plan, there has to be adequate time for consultation.

**We believe the council should commit to a Regulation 18b consultation.** This should provide:

- Full Travel Plans providing integrated district-wide data on rural roads capacity and highways impacts.
- Transparent benchmarking for calculating severe and cumulative impacts and for deciding when travel plans or travel assessment should be set out.