

maryott, kyle

From: [REDACTED]
Sent: 25 June 2018 07:35
To: futuremedway
Cc: [REDACTED]
Subject: Future Medway Local Plan 2012 to 2035 Development Strategy Regulation 18 consultation report

Categories: Blue Category

For the attention of: Medway Council

Consultation: Future Medway Local Plan 2012 to 2035 Development Strategy Regulation 18 consultation report

Dear Sir/Madam

We have been made aware of the above consultation which closes on 25 June 2018.

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 proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case with particular reference to the A2(west) and M2 in Medway.

In April 2017 we responded regarding the Development Options consultation for Medway Local Plan, acknowledging that *“the plan was in its earliest stages where the level of detail is naturally insufficient to assess and mitigate the transport impacts. Consequently, we are not in a position as such to either object to or support the Local Plan at this point in time”*. Also that the next steps would include:

- the issuing of the modelling validation report for assessment,
- production of future development distribution scenarios,
- then forecasting the transport impacts of those scenarios and
- production of necessary scenario supporting mitigation schemes that enable the strategic and local networks to continue to function safely, reliably and efficiently

Whilst the model validation has occurred and we approve the use of the base model; the other elements are still outstanding and we are still not in a position to either object to or support the Local Plan at this point in time. We will require sufficient, proportionate, robust and up-to-date evidence so that we can understand the location, form and extent of any impacts the Local Plan will have on the SRN, (taking into account as appropriate the Local Plans and permissions in neighbouring areas); and hence any SRN mitigation that needs to be included in the Local Plan.

Having considered the Development Strategy Regulation 18 consultation report we have the following additional comments:

We note that an annual housing need for Medway of up to 37,143 has been specified over the plan period. This is a substantial increase to 1,665 homes per year compared to the 2015 SHMA figure of 1,281 homes per year.

- General : a number of Proposed Policies do not specifically mention impacts on the road network; for example Policy I9 Gillingham football club new stadium. In line with DfT Circular 02/13 The Strategic Road Network and the Delivery of Sustainable Development, Highways England consider that development should be promoted at locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives, and which support existing business sectors as well as enabling new growth. In framing its contribution to the development of Local Plans, Highways England's aim will be to influence the scale and patterns of development so that it is planned in a manner which will not compromise the fulfilment of the primary purpose of the SRN. Accordingly we would be interested in any proposals that may have an impact on the SRN and we look forward to further opportunities to comment on site specific matters at the earliest possible stage. We would expect to see any proposals coming forward to be supported by an evidence based assessment of traffic impact, outlining that the proposals do not materially affect the safety, reliability and/or operation of the SRN (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 32).
- Policy I4 – Communications Technology – lists factors for considerations when assessing communications installations. This policy should also consider impacts on traffic flow and highway safety. Where such installations affect the SRN additional advice is provided in DfT C2/13 paragraphs A5 to A7 which state that the *“installations must not cause a safety or environmental hazard to any road users, workers, or any third party and it must not interfere in Highways England's ability to carry out either routine or structural maintenance. Neither should any harm be caused to the long-term integrity of the highway including pavement, earthworks, structures, drainage works and ancillary equipment”*. Also that *“all operations must be carried out without interference to traffic flows”* and that a full road safety audit is required.
- Policy T4 – Rochester Airport – we are already providing advice to the applicant on Rochester Airport and recommend that the policy states that proposals will need to demonstrate how any safety impacts should be mitigated.
- Paragraph 11.1 refers to technical transport assessments being carried out as part of the evidence base for the new Medway Local Plan and 11.21 refers to a Transport technical paper supporting this consultation – we note that this document could not be located as part of the consultation documents so could not be reviewed.
- Section 11.6 states that *“The council has commissioned a Strategic Transport Assessment (STA) as a key component of the evidence base. It is used to assess the existing situation and determine the transport implications of potential site allocations, providing an understanding of the cumulative and site specific impacts in terms of the capacity of the road network and the associated safety issues. The STA will inform strategic and specific mitigation requirements for sites allocated for development in the Local Plan.”*

Highways England were consulted in the early stages of the STA and we would welcome an update on progress made.

- Section 11.71 states that *“The council has adopted guidance for TAs which promotes the use of its new traffic model, recently validated by Highway England.”*

It should be made clear that whilst Highways England have approved the use of the new model Highways England have not validated the model.

- Policy T12: Managing the transport impacts of development states that “*The council expects proposals that will generate a significant amount of movement to be supported by a Transport Assessment. Applicants are encouraged to refer to the adopted Guidance Note for Transport Assessments*”.

It is acknowledged that the Guidance note alludes to consulting with Highways England however Policy T12 should emphasise that where a development impacts upon the SRN, the requirement for a TA or TS would need to be agreed with Highways England. In this case Highways England would need to be satisfied that development proposals will not materially affect the safety, reliability and/or operation of the SRN (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 32). Additionally, Highways England would want to agree the scope of the TA or TS at pre-application stage in conjunction with the local highway authority. Reference to key Highways England policy documents that describe the approach we take to engaging in the planning system and the issues we look at when considering planning applications should also be made. Accordingly this section should list the following which provides advice on the information we would like to see included in a planning proposal, and outlines the support we can offer i.e. Planning for the future – A guide to working with Highways England on planning matters (Sept 2015) in addition to DfT Circular 02/2013.

We look forward to further opportunities to comment on these documents and other elements of the Local Plan for the transport network as the technical work progresses as well as site specific matters at the earliest possible stage.

I trust that the above is of assistance and, should you have any queries regarding our response, please contact us.

Kind regards

David

David Bowie

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