

**Independent Examination of Medway Local Development Framework: Core  
Strategy Development Plan Document**

**Day 3: Thursday 14 June 2012: 2.00PM  
Matter 6 - Infrastructure**

**Representor: 31  
Highways Agency,  
Federated House, London Road, Dorking, RH4 1SZ**

**Represented by: Kevin Bown BSc (Hons) MPhil MRTPI  
Asset Manager, Area 4 (Kent)**

**Core Strategy Policy References:**

**CS16  
CS19  
CS24  
CS33  
CS35**

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Strategy Development Plan Document**  
Matters & Issues 'Infrastructure' 14<sup>th</sup> June 2012

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**This statement relates to Matters A and C identified under 'Infrastructure' (session 6)**

- 1.1 The Highways Agency has prepared this statement in accordance with the Guidance Notes for Participants. While the HA stands ready to seek to assist the EIP regarding any matters that come within its areas of expertise and responsibility, this statement focuses purely on providing further clarification on its position and its aspirations. Consequently, the Highways Agency does not have any views on matter (b) concerning development in areas at risk from flooding.
- 1.2 The Highways Agency has given further consideration to its representations submitted in response to the Publication Draft Core Strategy (2011) in context of:
  - a. the specific matters and issues the Inspector has specified for discussion at the EIP session on infrastructure,
  - b. the recently published National Planning Policy Framework, and
  - c. on-going technical work activity on the Lodge Hill planning application.
- 1.3 The Highways Agency makes reference to its original representation items that, for ease and clarity, have been grouped because they address a related category of issue.

**HA Representations: Strategic Development Allocations**

- 2.1 The Highways Agency raised two issues which relate to strategic development allocations identified in the Core Strategy (Rochester Airfield and the five Park and Ride sites). Firstly, the robustness of the evidence base required to demonstrate that these proposals are sustainable in transport terms; and, secondly the adequacy of any mechanism to engage with the Highways Agency in identifying (if required) appropriate mitigation.
- 2.2 The Highways Agency accepts, however, that any concerns regarding present and future traffic generation and congestion should not thwart the inclusion of the strategic proposals set out in the Core Strategy. Thus it is stressed that the Highways Agency is not raising objection to the allocation of these strategic proposals in the Core Strategy per se, but rather the means by which they can be progressed.
- 2.3 The Highways Agency considers that sufficient evidence has not been presented which shows what level of impact, if any, these strategic proposals will have on the Highways Agency's strategic road network, and what approach is available to manage the impact.

- 2.4 Therefore, the Highways Agency respectfully requests that the Inspector endorses the inclusion of text in the Core Strategy that requires that more detailed transport assessment work is undertaken and also ensures that any impact which does arise from any strategic development site identified in the Core Strategy, or comes forward by other means, is adequately mitigated as required by, and in accordance with, DfT Circular 02/2007, or its replacement.
- 2.5 The Highways Agency considers the following wording (based upon that included in the Infrastructure Delivery Schedule about Lodge Hill) could be applied to all strategic development identified in the Core Strategy:

***“Future joint working and cooperation between Medway Council, the Highways Agency and other relevant parties will be required to better understand the possible transport effects of strategic and/or other major development in Medway. Transport assessment work is required to be undertaken in accordance with national policy and guidance to identify detailed highway network requirements on the strategic road network. As defined by DfT Circular 02/2007 (or its replacement) the provision of appropriate mitigation on the strategic road network may be required. The scale, nature, location and timing of mitigation are to be agreed between Medway Council, the Highways Agency and all relevant parties.”***

- 2.6 The Highways Agency considers this proposed joint-working approach accords with NPPF paragraph 162.

#### **HA Representation: Definition of Strategic Road Network**

- 3.1 This representation referred to the definition of ‘strategic road network’. The Highways Agency raised this as an issue because of the potential confusion it may cause. For example, Policy CS16 indicates that easy and safe access to the strategic road network is a requirement for Gypsy, Traveller and Travelling Showpeople pitches within Medway. In this context, ‘strategic road network’ could refer to all major roads in Medway. The Highways Agency would not, however, accept direct access to its strategic road network for these facilities.
- 3.2 The Infrastructure Delivery Schedule (CS p.143) on the other hand makes reference to the strategic road network in the context of the Highways Agency and can be taken to mean the M2.
- 3.3 While a definition in the Core Strategy glossary or clarification within the main body of text would be helpful, we acknowledge that the Highways Agency does not have exclusive rights to its definition of strategic road network. And, on reflection, we accept that varying definitions of strategic road network do not undermine the soundness of the Core Strategy, nor hinder the Highways Agency’s statutory responsibilities. The Highways Agency is therefore content to leave the question of whether the incorporation of some form of clarification or revised terminology would assist plan users to better understand and implement the plan to the Inspector.

## HA Representations: Lodge Hill

- 4.1 The Highways Agency raised three matters related to the Lodge Hill strategic development site identified in the Core Strategy, specifically with regard to concern that the evidence does not sufficiently or appropriately describe the impact of the development on the Highways Agency's strategic road network, and thus justification that the proposed development is sustainable in transport terms has not been provided.
- 4.2 However, to reiterate an earlier point, the Highways Agency accepts that any concerns regarding present and future traffic generation and congestion should not thwart the inclusion of the Lodge Hill strategic site in the Core Strategy. Thus it is confirmed that the Highways Agency does not object to the inclusion of this strategic proposal in the Core Strategy.
- 4.3 The first of the three matters queried the reference made to the proposed 43,000m<sup>2</sup> employment floorspace as a minimum (CS p.126, para.10.111) . This is in conflict with the Medway Traffic Model evidence which incorporates 43,000m<sup>2</sup> as a maximum. It will be noted that the Medway Traffic Model is currently being used by the Lodge Hill developer as evidence to support its Transport Assessment. However, should more than 43,000m<sup>2</sup> employment be permitted, the full potential impact on the Highways Agency's strategic road network will not have been established. Therefore, the Highways Agency respectfully requests that the Inspector should ensure that this conflict is resolved by clarifying/ amending the plan accordingly.
- 4.4 The second matter identified a possible inconsistency between policies CS19 and CS33 regarding retail floorspace allocated to Lodge Hill. Policy CS19 identified 5,000m<sup>2</sup> of comparison retail floorspace in addition to 5,200m<sup>2</sup> of convenience retail floorspace. Policy CS33 indicates at least 5,000m<sup>2</sup> of retail floorspace. The Highways Agency is concerned that, as a substantial piece of evidence to support the Core Strategy, the Medway Traffic Model reflects substantially less retail than that indicated in Policy CS19. Furthermore, the Lodge Hill development Transport Assessment indicates around 5,000m<sup>2</sup> of retail floorspace, and traffic flows are understood to have been calculated on this basis. Therefore, the Highways Agency respectfully requests that the Inspector should ensure that this conflict is resolved by clarifying/ amending the plan accordingly.
- 4.5 The third matter raised concern with reference made in the Infrastructure Delivery Schedule to a specific form of highway mitigation, ramp metering, at M2 Junction 1. The Highways Agency raised concern that this reference was too detailed and that at that time evidence had not been presented to demonstrate the feasibility and appropriateness of such a form of mitigation. The Highways Agency put forward suggested replacement text and we note that this has been adopted by Medway Council in the Submission Draft Core Strategy for which the Highways Agency is grateful. The new text now makes more general reference to the Highway Agency's strategic road network which encompasses the M2 Junctions 1, 2 and 3, and this addresses the Highways Agency's concern. Therefore, the Highways Agency respectfully requests that the Inspector endorse the Submission Draft text.
- 4.6 The Highways Agency notes that technical review work has continued since submission of the representations and discussions with the Lodge Hill transport

consultants have been ongoing. The Highways Agency is encouraged by the reworded Core Strategy text because in its view it provides endorsement to the need for assessment of M2 Junctions 2 and 3 in context with Lodge Hill which the Highways Agency has requested and awaits a response from the developer.

- 4.7 We note that the Infrastructure Delivery Schedule indicates that the funding source for the appropriate mitigation on the HA's strategic road network will be the responsibility of the Lodge Hill developer.
- 4.8 We also note that following the requested assessment of M2 Junction 2 and 3, if highway mitigation is identified as being required, further discussion on phasing of mitigation in relation to Lodge Hill may be necessary. The Infrastructure Delivery Schedule indicates that mitigation on the Highways Agency's strategic road network would be required in Phase 1; however, this requires confirmation through further technical work. Therefore we respectfully request that the Inspector recommends a suitable form of revised wording to reflect this situation.
- 4.9 In addition, in order to address our concerns, and to be consistent with our previous suggestion regarding other sites, the Highways Agency respectfully requests that the Inspector endorses the inclusion of the following text in the Core Strategy.

***“Future joint working and cooperation between Medway Council, the Highways Agency and other relevant parties will be required to better understand the possible transport effects of strategic and/or other major development in Medway. Transport assessment work is required to be undertaken in accordance with national policy and guidance to identify detailed highway network requirements on the strategic road network. As defined by DfT Circular 02/2007 (or its replacement) the provision of appropriate mitigation on the strategic road network may be required. The scale, nature, location and timing of mitigation are to be agreed between Medway Council, the Highways Agency and all relevant parties.”***

- 4.10 The Highways Agency considers this proposed joint-working approach accords with NPPF paragraph 162.
- 4.11 Discussions between the Highways Agency and other parties will continue up to and beyond the date of the EIP Infrastructure session. If it would help the Inspector we would be pleased to provide an update on progress at the session.