

From: Bown, Kevin [<mailto:Kevin.Bown@highwaysengland.co.uk>]
Sent: 07 February 2017 17:11
To: 'lynetteljdassoc@aol.com'
Cc: Gill Harris; James Freeman
Subject: FAO Local Plan Inspector - Highways England position at Matter 5 Infrastructure Session

Dear Mrs Turner,

As agreed at the Infrastructure Session, I am emailing to confirm Highways England's position

- 1) The NPPF/PPG assumes that any LP submitted is sound unless proven otherwise.
- 2) The evidence produced to-date regarding the Strategic Road Network (SRN) does not give us full confidence that it is sound, but equally there is insufficient evidence to demonstrate it is not sound. Thus it is in the grey area in between.
- 3) Work continues to progress both the modelling and mitigation designs associated with Keycol Street, Bobbing and Grovehurst A249 junctions. There is evidence that this work can produce technically and financially deliverable mitigation schemes that will support the soundness of the plan, mitigating the impacts upon the SRN. But due to the late production of evidence, and some outstanding evidence, HE have, to date, not been in a position to complete its consideration of all of the necessary detailed evidence required for the Keycol and Grovehurst junctions and we have seen no impact assessment of the Bobbing junction.

However, HE also considers:

- 4) The absence of an adopted local plan, or a "Do Nothing" scenario, is a worse position as there will be no framework against which multiple sites can contribute to single, or a series of, mitigation schemes required to manage background growth and/or any planned or permitted development.
- 5) In the absence of such co-ordination, and the potential absence of a 5 year land supply, HE may be in the uncomfortable position of having to defend (potentially at appeal) objections to individual applications unless they deliver the full required mitigation in each case, which could affect their deliverability/ viability. This would be contrary to our Licence Obligations and natural inclinations to support local growth and regeneration.

Therefore;

- 6) Provided that Swale Borough Council agree to the "Maidstone-like" completion of a local plan review (including all necessary transport evidence gathering, such as modelling) within 5 years ie by end of financial year 2022; and
- 7) Swale Borough Council/ Kent County Council commit to producing/consulting on/ adopting a Transport Strategy to underpin that review; and
- 8) Provided the text set out below (which given they relate to process rather than strategy appear capable of being treated as a minor modification), are agreed and inserted in to the plan/IDS;

Highways England is content that its objections set out in its various representations regarding the Swale Local Plan have been addressed in terms of the Strategic Road Network from now until the plan is reviewed prior to 2022.

Swale Borough Council (who will lead on all matters) will continue to work with Highways England and Kent County Council (who will carefully monitor the local network and the implementation of permissions) in order to:

- a) Ensure that if the mitigation permissions are implemented, the mitigation occurs in a timely fashion; or*
- b) Ensure that if the mitigation permissions are not implemented (at all or to a timetable that mitigates the Local Plan as intended), then alternative mitigation schemes are prepared and implemented in a timely fashion; and*
- c) Ensure that the Keycol, Bobbing and Grovehurst Junctions also continue to be monitored for the impacts of individual and cumulative background and development impacts, with action taken to mitigate them as necessary.*

Should there be any queries regarding this matter, please contact me.

Regards

Kevin Bown, Spatial Planning Manager

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