

**Maidstone Local Plan Review
Statement of Common Ground
between
Maidstone Borough Council
and
National Highways
May 2023**

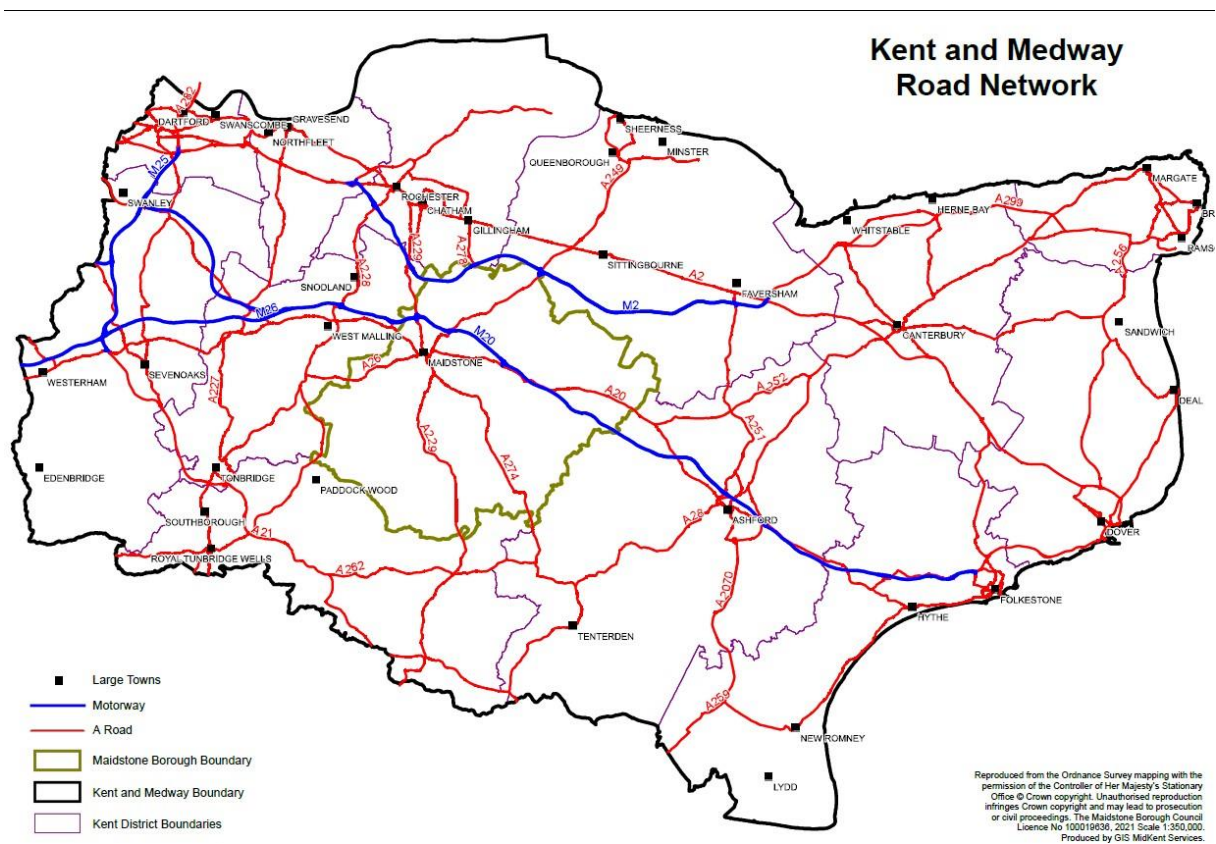
1.0 Background

1.1 Maidstone is a Borough Council within the County of Kent. Maidstone is the Local Planning Authority, while Kent County Council has responsibility for the provision of services including transport and education. Maidstone is surrounded by the Kent District Councils of Ashford, Tonbridge & Malling, Tunbridge Wells, Swale, and Medway Council which is a unitary authority which works collaboratively with Kent County Council to provide services.

1.2 National Highways (NH) has been appointed by the Secretary of State for Transport as the 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, NH 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.

1.3 NH will be concerned with plans and/or proposals that have the potential to impact the safe, reliable and efficient operation of the SRN within Maidstone Borough and its environs. The SRN within Maidstone Borough comprises the M20 and M2 and A21. However, the Local Plan will need to assess and, as necessary, mitigate any impacts across the wider SRN.

1.4 MBC have produced the Maidstone Local Plan View (LPR) covering the period 2022 to 2037. It was submitted on 31 March 2022. The LPR is currently at Examination.



2.0 Statement of Common Ground Overview

2.1 This Statement of Common Ground (SoCG) has been prepared by MBC and NH (the signatories). However, it also includes references to joint work with Kent County Highways with whom MBC have a separate SoCG.

2.2 The purpose of this SoCG is to set out the basis on which MBC and NH have actively and positively worked together to

- meet the requirements of the Duty to Co-operate in preparing MBC LPR in accordance with section 33A of the Planning and Compulsory Purchase Act 2004 (amended by section 110 of the Localism Act 2011) and National Planning Policy Framework (NPPF) 2021.
- provide the LPR Examining Inspector with the evidence required on transport matters
- meet the requirements set out in Department for Transport Circular 2/13 (C2/13) and NPPF2021 regarding assessing, agreeing and mitigating the impacts of plans and proposals on the SRN.

2.3 The signatories acknowledge that the statutory requirements of the Duty to Co-operate are not a choice but a legal obligation. While the obligation is not a duty to agree, co-operation should produce effective and deliverable policies on strategic cross boundary matters in accordance with the government policy in the NPPF, and practice guidance in the NPPG.

2.4 In the event of any disagreement, the signatories commit to discuss the issue, to see whether the relevant Plan can be modified to secure agreement. Where it can, the change will be noted within updated SoCG.

2.5 Internal sign-off will be subject to governance arrangements within each individual organisation.

2.6 The signatories agree that it will be for MBC to decide and action the submission, publication and/or consultation on any evidence or documentation referred to, or relied upon, in this SoCG

2.7 This SoCG represents the position as of 25 November 2022. It will be updated as appropriate, as matters arise and are resolved, and each version of the SoCG will be saved as a record of discussions.

3.0 LPR: Summary of Main Proposed Development

3.1 The Government's new national formula calculated from household formation and housing affordability figures is published regularly by Office for National Statistics, and the most recently published figure for Maidstone Borough (2021) currently stands at 1,157 new homes a year. MBCs Regulation 19 Plan outlines a housing requirement for 18,223 new homes over plan period (2022-2037). Meeting this target over the plan period will be provided for by development in LPR, existing planning permissions and small sites.

3.2 In particular the LPR contains major allocations at

- Heathlands – a proposed 5,000 homes, 5,000 jobs new community, located near Lenham, between M20J8 and J9
- Lidsing – a proposed 2,000 homes, 2,000 jobs new community, located near the Medway Towns, close to M2J4

3.3 The basic housing numbers, together with key floorspace figures for other land uses are shown below.

Identified growth needs (2022- 2037)
Residential (dwellings) – 17,355
Employment– 101,555 sqm
Retail until 2032 - 10,847 sqm

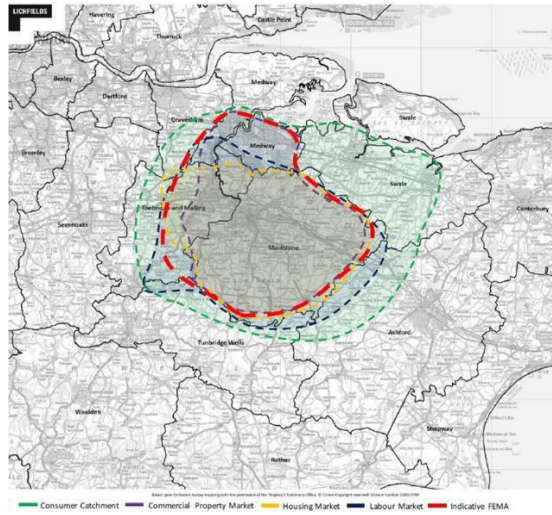
Housing

3.4 The housing requirements being planned for MBC are set out below.

	Maidstone
Housing Target	18,223
New Plan Until	2022-2037
Unmet need	0
New Plan Stage	Local Plan Review Regulation 18b December 2020. Regulation 19 October 2021.

Employment

3.5 MBC has undertaken an Economic Development Needs study (2019/2020). This study indicates that the Functioning Economic Market Area and a quantum of growth of 101,555m2. Through its Local Plan Review, MBC is expecting to meet employment land need within the borough, with an additional degree of oversupply to provide flexibility and choice.



Retail

3.6 The EDNS produced on behalf of Maidstone indicated that there is a retail floorspace requirement 2022-2032 is 10,838 sqm (gross). This need will be met within Maidstone borough.

3.7 For residential growth, when compared with the adopted 2017 LP, there is an increase of 5,455 new units from 2022 to 2037. For employment, the need is reset and not additional to that already identified. As this is a LPR the growth outlined above is split between saved existing undeveloped allocations from the Local Plan 2017 and new allocations proposed here in this consultation. The proposed split between existing and new allocations is as follows:

Undeveloped Local Plan 2017 allocations/broad locations	New LPR proposed allocations
Residential: 3,372	Residential: 5,455
Employment: 61,300 m2	Employment: 194,547 m2

4.0 Strategic matters

4.1 The signatories acknowledge the following matters.

4.2 The NPPF defines the topics considered to be strategic matters (para 20). The strategic matters relevant to MBC and NH are

- the cross-boundary matters associated with the movement of vehicular traffic on the SRN; and
- the impacts of development proposed and/or resulting from any adoption of the LPR on the Strategic Road Network within the district; and
- the interplay between the Strategic Road Network and Local Road Network where any changes to, or need for mitigation of, the latter may have consequences for the former.

4.3 Government policy places much emphasis on housing delivery as a means for ensuring economic growth and addressing the current national shortage of housing. The NPPF is very clear that:

“strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.”

4.4 DfT Circular 01/22 (C1/22) was published in December 2022 and maintains the position previously established in the former DfT C2/13 and the NPPF that any development, including housing delivery, must be tempered by the requirement to ensure that it can be accommodated without unacceptable impacts on the safety, reliability and operation of the SRN. Therefore, as necessary and appropriate, any plan and/or development must be accompanied by suitable mitigation in the right places at the right time, that is to the required standards and is deliverable in terms of land availability, constructability and funding. As C1/22 was published between Stages 1 and 2 of the Examination, National Highways has requested that the submitted Local Plan and allocations be assessed against the new circular for compliance; statements which set out the results of these assessments have been prepared by the relevant parties and reviewed by National Highways. National Highways is content that the Local Plan and allocations are compliant with the requirements of C1/22.

5.0 Engagement and Co-operation To-date.

5.1 MBC and NH have been engaged in ongoing and effective co-operation from inception to delivery of their local plans. At times this has also included KCC where there are matters of mutual interest.

5.2 NH and MBC have engaged on a regular basis both during and between formal consultations, which have included Reg. 18a Scoping, Themes & Issues (2019), Reg. 18b Preferred Approaches (2020-21), and Reg 19 Draft for Submission (2021) consultations and evidence base development (IDP and transport modelling); the details of which are listed on MBC's website. Through these meetings, both bodies have identified any cross- boundary matters that needed further, more detailed consideration.

5.3 Additionally, through their ongoing cooperation, MBC and NH have engaged on matters of policy development to consider the impact of emerging plans on cross boundary strategic matters, especially highways infrastructure improvements.

5.4 In summary, the signatories are aware and agree that for

- a) The main allocations at Heathlands and Lidsing respectively; and
- b) The LPR overall (that takes account of individual and cumulative SRN impacts of the main allocations and all other development to be delivered as a result of the LPR)

National Highways requires the production of, and to agree, sufficient robust evidence regarding

- i) Baseline Modelling ie what is the current position
- ii) Forecast Modelling ie what will be the position once all commitments and the LPR are added
- iii) LPR Impacts and Mitigation
ie what are the impacts: where and when/how will they be felt
ie what are the required mitigations: where and what are they, when will they be required, how much will they cost, how will they be funded and who will be

responsible for their delivery

5.5 Against this background, and in view of the move from a traditional “predict & provide” approach (based largely on physical road building and improvements and on a “worse case” basis) to the now advocated “vision & validate” approach (based more on mode share shift and sustainable transport), National Highways fully support the use of Monitor & Manage Frameworks (MMF).

5.6 Under MMF a baseline of physical mitigations needs to be agreed (and enshrined in policy), since this will guarantee that where impacts are felt, they will be fully mitigated. However, where those mitigations may not be required for some time, it allows parties to progress their sustainable and other transport aspirations and to assess whether a “worse” or “better” case proves to be correct, and for a review to occur as to whether physical or other mitigations are required at the appropriate time.

5.7 All signatories recognise that MMF will have an important part to play in the LPR per se and in particular the major allocations at Heathlands and Lidsing given the long period over which they will be progressed and then delivered.

5.8 All signatories, however, also recognise the need for the suite of baseline mitigations in order to comply with national policy by safeguarding the SRN and not transferring any risk to NH/DfT.

5.9 All signatories will use their best endeavours to supply, review and respond to new or amended evidence in a timely and efficient matter.

6.0 Current State of Progress (Stage 1 previous position, Position as at Stage 2 Hearings) And Next Steps (SPD and Onward)

6.1.0 Heathlands

6.1.1 Summary of Stage 1 Hearings evidence

- **Baseline Modelling:** The baseline modelling was agreed by NH on 24 October 2022
- **Forecast Modelling:** The forecast modelling requires various minor amendments to correct factual/ geometric errors, but was considered at the time of the Stage 1 hearings to be close to completion and agreement
- **Mitigation:** The modelling (as presented at the time of the Stage 1 hearings) has demonstrated that Heathlands
 - will need to mitigate M20J8 and the nearby KCC A20 junctions; the details of which were not agreed at the time of the Stage 1 hearings
 - may need to mitigate (alone, or as a contribution to wider LPR mitigation) other M20 junctions, for example J7 and J9. But the evidence was not complete at Stage 1 and hence the list could not be definitive, nor could the details of the actual mitigation
 - A new junction between M20 Junctions 8 and 9 was not demonstrated to be necessary in terms of the performance of the SRN to accommodate the Heathlands development, subject to completion of the M20 J8 and KCC A20 junction mitigation development and testing.
- **Other Comments:** National Highways were (and remain) content with the work done by KCC in terms of the assessments around M20 J8 (where the impacts to the slip roads shown are consistent with the data presented by Vectos) and J9 (where the model data

confirms that the impacts of both Heathlands and the other Local Plan schemes are spread around the junction and modest in nature).

- Other Comments: National Highways has previously considered the Sustainability Appraisal as part of the Autumn 2021 consultation. Specifically with regard to Heathlands (and its impacts on junctions 8 and 9 of the M20) it was noted that these proposals were a deviation from the adopted Local Plan and that policies (including mitigation) would need to be revised to account for this. The current proposals for mitigation being developed will need to demonstrate compatibility with the assumptions in the Sustainability Appraisal and be suitably tested in terms of when and how the need for specific mitigation will be triggered; this is expected to form part of the further work associated with the SPD. This expectation has not changed as a result of the further work undertaken between the Stage 1 and Stage 2 hearings.

6.1.2 Additional documentation for Stage 2 Hearings

- WSP (on behalf of Homes England and Maidstone Brough Council) have provided the Heathland EiP Transport Impact Assessment April 2023 (lodged as ED89 and ED89A for the Appendices)
- In terms of impact on the Strategic Road Network (SRN) and therefore the main point for National Highways (NH) further technical work is presented for M20 Junction 6 (section 4.2.4 of the WSP report), M20 Junction 7 (section 4.23 of WSP report), M20 Junction 8 (section 4.1 and 6 of the WSP report) and M20 Junction 9 (section 4.16).
- In terms of detailed modelling only J8 was furthered from the four junctions noted above. Modelling is provided which includes both M20 J8 (roundabout and slip-road) and the A20 / M20 link roundabout. A concept mitigation scheme is presented as WSP Appendices E and H.
- WSP are working with NH to provide a DMRB GG119 Road safety Audit (RSA S1); to date, the audit brief has been approved by National Highways, the RSA S1 report has been produced by the auditors, the report has been reviewed by National Highways and formally issued by National Highways to the designers for the preparation of the designers' response, and a copy of the designers' response is currently being reviewed by National Highways (the final step in the auditing process).

'Monitor and Manage' frameworks have been proposed as part of text suggested for Main Modifications. In addition, the Heathlands site promoter has also commented on this approach in a response lodged as ED90.

6.1.3 Current State of Progress (Stage 2 Hearings)

- Baseline and Forecast Modelling: The baseline and forecast modelling completed by the Heathlands promoters includes a combined model for M20 J8 and the A20/M20 roundabout and was agreed by NH on 03 March 2023
- Mitigation: The modelling completed by the Heathlands promoters demonstrates that Heathlands
 - will need to mitigate M20 J8 and the nearby KCC A20 junctions; a mitigation scheme has been produced in concept which demonstrates deliverability in terms of both design and assessment and is considered acceptable. A package of DMRB compliant drawings was provided with a basic costing of the proposed mitigation measures which has been checked by National Highways and is agreed

as sufficient at this Local Plan stage; further work required in regards to these mitigation measures will be required at the SPD stage.

- may need to mitigate M20 J9 as a contribution to wider LPR mitigation however the impact at M20 J9 is expected to be modest and the demonstrable evidence provided that is acceptable.
- does not need to specifically mitigate the impacts of the Heathlands development on M20 J7 or M20 J6 with demonstrable evidence provided which is acceptable; however, KCC work continues with regard to the wider Local Plan impacts at these junctions.
- A Monitor and Manage strategy is proposed with the basics of the process, content and governance set out in the evidence by WSP to provide a basis for the details at SPD or application stage.
- A new junction between M20 Junctions 8 and 9 is not demonstrated to be necessary in terms of the performance of the SRN to accommodate the Heathlands development, subject to completion of the M20 J8 and KCC A20 junction mitigation development and testing.

Additional requirements before adoption of the LP:

- Policy: MBC to provide updated LPR policy and supporting text, based on the above setting out the policy framework, governance and responsibilities for the delivery of agreed SRN impacting infrastructure in connection with Heathlands. This will also include updates **IDP** documentation regarding how SRN infrastructure fits into the wider picture of infrastructure requirements and delivery.

Additional requirements at the SPD and planning stages are as follows:

- Mitigation: The full package of DMRB compliant drawings for the mitigation at M20 J8 should be updated/ completed by the Council/ site promoter and submitted to NH for assessment and agreement at the earliest opportunity in the development of any Supplementary Planning Document (SPD) related to this allocation and before any application is submitted.

6.1.4 Heathland as a Station Led Development

Work has been progressed as 'no station scenario' consistent with the comments by the inspector in ED 70 para 5.9

'Notwithstanding improved bus services, the potential of a new station and the requirement in Policy LPRSP4(a) to appropriately phase the delivery of infrastructure, services and jobs, the reality is, however, that future inhabitants will travel, and the private car will remain a key transport choice. Further work is ongoing regarding necessary off-site highway interventions. I stress however, that the work and outputs need only be proportionate to plan-making and not the level of detail necessary to inform a planning application (i.e. a detailed Transport Assessment). In headline terms the additional work needs to confirm a reasonable prospect of a deliverable solution to junction improvements at M20 Junction 8 and a headline menu of works along the A20 corridor which can be demonstrably necessary to facilitate the development. The outcomes of this work should be identified in an updated statement of

common ground with National Highways and Kent County Council. At this stage I am satisfied, however, that the proposed modifications to parts 6e) and 6f) of the Policy LPRSP4(a), presented in ED59, provide sufficient policy hooks to ensure that any impacts on the strategic and local road networks are appropriately considered and where necessary mitigated.'

MBC, as part of the Stage 1 Hearings, has committed to ensuring that Heathlands is a "station" led development. This is reflected in the Inspector's comments reproduced above.

The signatories recognise that this commitment has yet to be fully worked through. Therefore, as the outcome is not yet known, it is agreed that "with" and "without" station SRN assessments are necessary. In this way, it is intended to ensure that the LPR is sound in the SRN context, regardless of the progress or otherwise of the station proposals.

It is assumed for the purposes of this SoCG that the "With Station" option will be progressed at the SPD or application phases of the proposals as a result of the 'without Station' option demonstrating acceptable deliverable mitigation. The steps which will be required to be completed at the relevant stages are set out below for clarity.

6.1.5 "With Station" Assessment (post Stage 2 Hearings)

- **Modelling:** NH will need to confirm the assumptions to be fed into the KCC models to represent a "With Station" scenario in 2037 and 2050. As discussed at the 24 October 2022 meeting and subsequently, this will mean adjustment to modal split assumptions for Heathlands trips, and there will need to be an examination of the model zoning and trip matrices to identify existing car trips to and from the stations which would potentially close. This analysis should also consider how many other non-car trips to these existing stations would potentially transfer to car-based (including drop-off) trips to the new Heathlands.
- **Modelling:** Some of this information will be contained in the additional "case for Heathlands Station" and "Strategic Outline Business Case" documents. We will need a stand-alone statement of the assumptions and information needed to be prepared between WSP (Heathlands) and KCC.
- **Modelling:** The updated KCC modelling will need to be completed and the resulting data sense-checked by National Highways.
- **Modelling:** The data will then need to be applied to the M20 J8/A20 combined model and the results compared to the "worst case" modelling. This comparison should enable NH to determine whether physical mitigation is still required, and if this is the case, how the scale of this is changed by the impacts of the new station.
- **Mitigation:** If physical mitigation of SRN junctions is determined to be not necessary, dependant to the delivery of the Heathlands station, this would be able to be dealt with via the MMF and, potentially, be confirmed at the SPD stage.
- **Mitigation:** If some degree of physical mitigation remains necessary, an engineering review and costings similar to that completed for the "worst Case" will need to be undertaken for the revised mitigation scheme. (However, if the "Worst Case" engineering review is already being undertaken, this may in effect also serve the

purpose for a less extensive upgrade and therefore avoid duplication of work for all parties).

6.1.6 “With Station” Assessment – Actions for SPD preparation

- Modelling: Further modelling work will be required to inform the SPD with regard to the phased impacts of the development, including any revisions to when the station is likely to become operational. It is anticipated that this will include testing of any pre-station interventions (such as shuttle buses).
- Sustainable Transport Strategy: A thorough approach to the wider Sustainable Transport Strategy (outlined in the current LPR evidence base) will need to be developed. The STS will need to demonstrate how use of all types of sustainable modes will contribute toward reducing trips which would otherwise use the SRN.
- Design: Further clarity will be required in terms of station car parking provision and drop-off facilities, and how on-street parking in surrounding areas will be managed to discourage unwanted commuter parking behaviour.
- DMRB Compliance: Additional development of any required residual mitigation to the SRN will need to be undertaken, including full compliance with the requirements of GG104, GG119, GG142 and any other DMRB standards, full completion of RSAs, and more detailed cost estimates.
- Alongside the SPD work, the assessment relating to the other Local Plan developments (see below) are likely to require refreshment to account for any change to the station delivery date.

6.2.0 Lidsing

6.2.1 Summary of Stage 1 Hearings evidence

- Baseline Modelling: The Baseline modelling has previously been agreed by NH on 15 September 2022 (Lidsing Developer Team Aimsun Modelling using Medway model data). Some minor geometry issues have been identified with the KCC modelling using the Kent Transport Model (KTM) data) for M2 Junction 3; these were identified as requiring amendment but this was not expected to significantly change the model conclusions. The modelling of M2 Junction 4 is agreed (as of 24 October 2022).
- Forecast Modelling: NH has previously undertaken a review of the Aimsun forecast modelling, with comments provided to the Lidsing Developer team on 10 and 15 September 2022. The forecast modelling of the “do minimum” scenario is considered broadly acceptable; A number of queries were outstanding at the time of the Stage 1 hearings in relation to the representation of the proposed mitigation scheme within the Aimsun model (and associated LinSig modelling undertaken by the Lidsing Developer Team); a further technical response was received on 20 October 2022. National Highways forwarded its response to the promoter on 25 November 2022. The further work to be undertaken with the Aimsun model has now been agreed as being appropriate to conduct as part of the next stage of scheme development; a technical note setting out KCC and the promoters’ approach has been submitted as document ED91 and is referenced below.
- Mitigation: The modelling (as at the time of the Stage 1 hearings) demonstrates that Lidsing:

- Will need to mitigate M2J4; a form of mitigation comprising a new overbridge and a 4th arm are proposed. While progress was being made at the time of the hearings, the technical and environmental challenges of the location mean agreement had not yet been reached at this point.
- May need to mitigate (alone, or as a contribution to wider LPR mitigation) other M2 junctions. But the evidence was not complete at the time of the hearings and hence the list could not be definitive at that time, nor could the details of the actual mitigation.
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- Other Comments: It is acknowledged that the Lidsing proposals for M2 J4 include an element of incursion into the AONB to facilitate the proposed highway improvements; NH has previously identified between the promoter and MBC that the technical package (see below) will need to clearly identify whether alternatives which avoid this incursion have been considered and if so, how and why they have been discounted. If DMRB design compliance requires AONB incursion, then the package will need also include DMRB environmental compliance documentation. If AONB compliance requires DMRB Departures, the package must also clearly set out and justify them or set out why options have been discounted.

6.2.3 Additional documentation for Stage 2 Hearings

- C&A on behalf of the site promoter have provided additional information lodged as ED 93-95.
- C&A are maintaining dialogue with National Highways with regards the proposal for M2 J4.

'Monitor and Manage' frameworks have been proposed as part of text suggested for Main Modifications. In addition, the Heathlands site promoter has also commented on this approach in a response lodged as ED92.

6.2.4 Current State of Progress (Stage 2 Hearings)

- Baseline Modelling: The Baseline modelling has previously been agreed by NH on 15 September 2022 (Lidsing Developer Team Aimsun Modelling using Medway model data). The previously identified minor geometry issues have been addressed by KCC. The modelling of M2 Junction 4 is agreed (as of 24 October 2022).
- Forecast Modelling: The required further work to be undertaken with the Aimsun model has now been agreed as being appropriate to conduct as part of the next stage of scheme development; a technical note setting out KCC and the promoters' approach has been submitted as document ED91. National Highways has reviewed this document and is in agreement with the proposed approach.
- Mitigation: The modelling (as at the time of the Stage 2 hearings) demonstrates that Lidsing:
 - Will need to mitigate M2J4; a form of mitigation comprising a new overbridge and a 4th arm are proposed. Additional work has been undertaken with regard to the required future modelling (Document ED91) and Phasing (Document ED93) to support the previously submitted package of technical (General Arrangement) drawings. ED93 clarifies the proposals for phasing, specifically including the interim scheme for connection to M2J4 and the east-west link.

- May need to mitigate (alone, or as a contribution to wider LPR mitigation) other M2 junctions. KCC have conducted additional technical work in this regard; this is discussed under “wider LP impacts. Some further work remains outstanding, however it has been established that the impacts of Lidsing itself at other locations on the SRN are unlikely to require significant mitigation and any such requirements will be addressed through the SPD and planning application processes.

Other Comments: It is acknowledged that the Lidsing proposals for M2 J4 include an element of incursion into the AONB to facilitate the proposed highway improvements; this has been raised as a topic for discussion by the Inspector (Question 2.17). NH has previously identified between the promoter and MBC that the technical package (see below) will need to clearly identify whether alternatives which avoid this incursion have been considered and if so, how and why they have been discounted. If DMRB design compliance requires AONB incursion, then the package will need also include DMRB environmental compliance documentation. If AONB compliance requires DMRB Departures, the package must also clearly set out and justify them or set out why options have been discounted. It is agreed as a result of the further submissions that, from a technical perspective, this work can be undertaken at the SPD stage.

It is further noted that, in addition, Jacobs on behalf of KCC Highways (lodged as ED91) have also commented on the modelling of M2J4 with regards the different models. In the summary it is stated,

‘The decision to use the assessment undertaken by Lidsing promotor is acceptable, incorporating the partial signalisation proposed at M2 J4 eastbound slip road. However, this case is specific only to M2 J4 junction model analysis and should be treated in isolation.’

For completeness, the report lodged as ED94 ‘focuses on a comparison between traffic forecasts derived from the Medway AIMSUN and KCC VISUM strategic models for the purposes of considering the likely impact and thus need for mitigation on the rural lanes, including through Bredhurst and Boxley’. The main modelling work undertaken to date has taken a “worst case” approach in terms of expected demands and impacts on the SRN; the alternative scenarios discussed in ED94 would result in a smaller impact to the SRN and as such it is agreed that National Highways has no need to comment on this document for the purposes of this Statement of Common Ground.

6.2.5 Next Steps (Post LPR Hearings)

Additional requirements before adoption of the LP:

- **Policy:** MBC to provide updated LPR policy and supporting text, based on the above setting out the policy framework, governance and responsibilities for the delivery of agreed SRN impacting infrastructure in connection with Lidsing. This will also include updates IDP documentation regarding how SRN infrastructure fits into the wider picture of infrastructure requirements and delivery.
- **Modelling:** Further modelling work will be required with regard to the phased impacts of the development (building upon the information submitted in document ED93), including details as to when key sustainable transport infrastructure and services are likely to become operational, and the operation of the monitor and manage strategy.

- **DMRB Compliance:** Additional development of any required residual mitigation to the SRN will need to be undertaken, including full compliance with the requirements of GG104, GG119, GG142 and any other DMRB standards, full completion of RSAs, and more detailed cost estimates.

6.3.0 **Overall LPR**

6.3.1 **Summary of Stage 1 Hearings Evidence**

- **Baseline modelling:** at a fairly coarse level, the baseline junction modelling was agreed on 24 October 2022. Some minor amendments to geometries for the base models have been identified for M2 J3 (Lord Lees and Taddington roundabouts) and M20 J6; it was also noted that the data presented for M2 J5 in the Jacobs technical note does not match the information present in the supplied model files (the latter has been taken as the data for appraisal. These discrepancies were not expected to impact significantly on the outcome of the baseline model conclusions or the forecast modelling.
- **Forecast Modelling:** The forecast modelling requires some minor amendments to correct factual/ geometric errors but was considered to be close to completion and agreement.
- **Mitigation:** The modelling (as at the time of the Stage 1 hearings) demonstrated that, in relation to the overall LPR:
 - There will be a need to mitigate M20 J8 and the nearby KCC A20 junctions; the details of which are not yet agreed (as set out in relation to Heathlands)
 - There will be a need to mitigate M2J4; a form of mitigation comprising a new overbridge and a 4th arm are proposed. While progress is being made, the technical and environmental challenges of the location mean agreement has not yet been reached (as set out in relation to Lidsing)
 - There will be a need to mitigate M20 J6 as a result of general growth associated with the LPR (but not linked to a single large scheme); the A229 NB and SB links, and the M20 westbound off-slip, are all shown in the junction models to operate over capacity in all 2037 and 2050 scenarios. (It was noted that the LPR growth does not cause any part of these junctions to exceed their capacities where this was not the case in the 2037 reference case scenarios, but nevertheless mitigation will be required to achieve as close as possible to a “nil detriment” situation and minimise the risk of disruption to adjacent junctions or the M20 mainline.
 - There may be a need to mitigate other M20 junctions, for example J7 and J9 (and M2 Junction 5). But the evidence was not complete and hence the list could not yet be definitive, nor can the details of the actual mitigation
- **Other Comments:** We are content that the other SRN junctions not included in this list have been assessed via previous strategic modelling work and shown to operate in a satisfactory manner in the assessed future year scenarios, therefore additional junction modelling work has not been required.

6.3.2 **Additional documentation for Stage 2 Hearings**

- Evidence, using the Kent Transport Model for 2037 and 2050, has been provided to National Highways regarding the cumulative impact of the whole Local Plan to consider the following motorway junctions:
 - M2 Junction 3
 - A229 Lords Lees Roundabout
 - M2 Junction 4
 - M2 Junction 5

- M20 Junction 6
- M20 Junction 7
- M20 Junction 8

The results of this work have identified that additional mitigation relating to the whole Local Plan is likely to be required in relation to M2 Junction 3 and A229 Lord Lees roundabout, M20 Junction 6 and M20 Junction 7.

- Modelling work to demonstrate the effectiveness of possible mitigations for M20 J6 and M2 J3 is also underway by KCC as the Local Highways Authority. KCC have advised that the work in relation to M20 J6 is expected to be completed by the end of May 2023; the work in relation to M2 Junction 3 is programmed and should be completed in 1-2 months (subject to confirmation of appointment).

In terms of the M20J7 ED86,87 and 88 provides layouts and modelling results for the Existing Layout, Proposed Layout and Further Mitigation.

It is noted that KCC's design works for M2 Junction 3, M20 J6 and M20 J7 have been in development independently of the Maidstone Local Plan for some time, and that National Highways has been involved in these processes from both an assessment and design perspective. It is therefore considered that, whilst further work is required to confirm that the designs will address the needs of the Maidstone Local Plan, the work done to date enables confidence that an appropriate mitigation package can be identified. Additional work will also be required around funding mechanisms, however the work to date has been carried out to include discussions with DfT and these are expected to continue accordingly.

6.3.3 Current State of Progress (Stage 2 Hearings)

- Baseline modelling: at a fairly coarse level, the baseline junction modelling was agreed on 24 October 2022. The required minor amendments to the modelling have been undertaken by KCC and are reflected in the additional data referenced in section 6.3.2 above.
- Forecast Modelling: The forecast modelling has been completed and is included in the additional data referenced in section 6.3.2 above.
- Mitigation: The modelling (as at the time of the Stage 2 hearings) demonstrates that, in relation to the overall LPR:
 - There will be a need to mitigate **M20 J8** and the nearby KCC A20 junctions; the details of which are agreed as sufficient for the purposes of the Local Plan (as set out in relation to Heathlands)
 - There will be a need to mitigate **M2 J4**; the details of which are agreed as sufficient for the purposes of the Local Plan (as set out in relation to Lidsing)
 - There will be a need to mitigate **M20 J6** as a result of general growth associated with the LPR (but not linked to a single large scheme); the A229 NB and SB links, and the M20 westbound off-slip, are all shown in the junction models to operate over capacity in all 2037 and 2050 scenarios. (It is noted that the LPR growth does not cause any part of these junctions to exceed their capacities where this was not the case in the 2037 reference case scenarios, but nevertheless mitigation will be required to achieve as close as possible to a "nil detriment" situation and minimise the risk of disruption to adjacent junctions or the M20 mainline. Additional modelling in relation to this requirement is expected to be complete at the end of May 2023
 - There will be a need to mitigate **M2 J3**; the necessary further modelling work required to supplement the scheme development work already undertaken by KCC is expected to be completed in July 2023;

- There will be a need to mitigate **M20 J7**; KCC have submitted documents ED86 to ED88 which set out the results of assessment of current proposals to upgrade this junction.
- Other Comments: We are content that the other SRN junctions not included in this list have been assessed via previous strategic modelling work and shown to operate in a satisfactory manner in the assessed future year scenarios, therefore additional junction modelling work has not been required.

6.3.4 Next Steps (Post LPR Hearings)

Additional requirements before adoption of the LP:

- Policy: MBC to provide updated LPR policy and supporting text, based on the above setting out the policy framework, governance and responsibilities for the delivery of agreed SRN impacting infrastructure in connection with the overall LPR. This will also include updates IDP documentation regarding how SRN infrastructure fits into the wider picture of infrastructure requirements and delivery.
- Modelling: Further assessment of the ongoing modelling work will be required with regard to the impacts of the wider local plan (building upon the information submitted in documents ED86 to 88 in the case of M20 Junction 7), including details as to how the proposed mitigation measures will need to be phased to reflect the expected build-out of the Local Plan allocations.
- DMRB Compliance: Additional development of any required residual mitigation to the SRN will need to be undertaken, including full compliance with the requirements of GG104, GG119, GG142 and any other DMRB standards, full completion of RSAs, and more detailed cost estimates.

6.4.0 Invicta Barracks

The site promoter has provided initial opinion on the impact of the SRN from Invicta Barracks as a stand-alone site. This is lodged as ED96. The technical work described in ED96 is based on data from the KCC Strategic Model; National Highways has reviewed this information and has identified that, in this specific instance, the performance of M20 Junction 6 is better in the strategic model than is observed in more detailed local junction modelling which National Highways is reviewing from other current planning applications. However, National Highways is content that the particular impacts associated with Invicta Barracks (in terms of expected changes to traffic flows) are sufficiently small that any associated impacts can be addressed through the necessary detailed testing which will be required to accompany a future planning application, and that it is not necessary for any associated direct mitigation to be developed at the current stage of the Local Plan process. National Highways will continue to engage with the site promoters in order to ensure that any necessary mitigations which reflect the expected trip distributions from the site are identified and delivered as further information becomes available.

Summary of National Highways Position as at May 2023

Based on all of the above the signatories recognise that National Highways current position is as follows:

Heathlands

- National Highways has undertaken a substantial amount of technical work and analysis with KCC and Maidstone BC (alongside the Heathlands promoter) to develop the evidence base regarding the impacts of the proposed development over the Local Plan Review period (i.e. to 2037). This has been supplemented by longer-term testing around the full Heathlands proposals, which are assumed for the purposes of these exercises to be complete by 2050.
- National Highways does not consider that at present there is any evidence that the Heathlands proposals cannot be successfully mitigated from a technical design viewpoint; the type, extent and means of delivery of the necessary mitigation has been investigated in line with the previously identified stage 2 tasks.
- Therefore, overall, significant information has been provided with regards the Heathlands proposals in terms of them appropriately mitigating their impacts on the SRN such that its safety, reliability and operational efficiency will not be unacceptably affected and we are therefore now content that the necessary information has been supplied to enable National Highways to be satisfied with the proposed mitigation measures as being appropriate to demonstrate soundness for the purposes of the Local Plan Review. For avoidance of doubt, we are content that there do not appear to be any “showstoppers” that would prevent the further required work at SPD and later stages being completed, nor the required mitigation being placed into policy and successfully worked up to full detail, and then funded and delivered via the LPR/ Heathlands development.

Lidsing

- National Highways has undertaken a substantial amount of technical work and analysis with KCC and Maidstone BC (alongside the Lidsing promoter) to develop the evidence base regarding the impacts of the proposed development over the Local Plan Review period (i.e. to 2037). This has been supplemented by longer-term testing around those proposals elsewhere in the LPR which are expected to continue their build-out beyond the current local plan period, and which are assumed for the purposes of these exercises to be complete by 2050.
- National Highways does not consider that at present there is any evidence that the Lidsing proposals cannot be successfully mitigated from a technical design viewpoint; following the Stage 1 hearings, the type, extent and means of delivery of the necessary mitigation has been investigated in line with the Stage 2 tasks.
- Therefore, overall, significant information has been provided with regards the Lidsing proposals in terms of them appropriately mitigating their impacts on the SRN such that its safety, reliability and operational efficiency will not be unacceptably affected and we are therefore now content that the majority of the necessary information has been supplied to enable National Highways to be satisfied with the proposed mitigation measures as being appropriate to demonstrate soundness for the purposes of the Local Plan Review. For avoidance of doubt, we are content that there do not appear to be any “showstoppers” that would prevent the further required work at SPD and later stages being completed, nor the required mitigation being placed into policy and successfully worked up to full detail, and then funded and delivered via the LPR/ Lidsing development.

- National Highways has undertaken a substantial amount of technical work and analysis with KCC and Maidstone BC to develop the evidence base regarding the impacts of the proposed developments proposed within the Local Plan over the corresponding Review period (i.e. to 2037). This has been supplemented by longer-term testing around those proposals in the LPR which are expected to continue their build-out beyond the current Local Plan period, and which are assumed for the purposes of these exercises to be complete by 2050.
- National Highways does not consider that at present there is any evidence that the wider Local Plan proposals cannot be successfully mitigated from a technical design viewpoint; however, the type, extent and means of delivery of the necessary mitigation at certain locations (principally the A229 corridor, including M2 J3 and M20 J6) has yet to be fully determined. This includes mitigation for Local Plan development outside of the major allocations at Heathlands and Lidsing, in the event that those schemes were to be delayed or significantly amended.
- There remain a number of tasks outstanding in order to enable NH to reach firm conclusions on the extent of the Local Plan impacts, but there is an agreement in principle as to the scope and requirements of these tasks, and the timescales to complete them.
- The tasks themselves which have been identified are considered to be representative of a “typical” Local Plan or Local Plan Review and current guidance and good practice will be applied. We are not reliant on any unusual or “untested” assessment methods.
- Therefore, overall, significant information has been provided with regards the Local Plan Review proposals in terms of them appropriately mitigating their impacts on the SRN such that its safety, reliability and operational efficiency will not be unacceptably affected. We are content that there do not appear to be any “showstoppers” that would prevent the required work being completed, nor the required mitigation being placed into policy and successfully worked up to full detail, and then funded and delivered via the LPR and other commensurate sources. However, National Highways will need to consider the outcomes of the assessments which have been described in this document in order to confirm the type and extent of the mitigations which will be required at the next stages of the planning process.
- All of the above assumes that MBC will, prior to the adoption of the LPR provide updated LPR policy and supporting text, based on the above setting out the policy framework, governance and responsibilities for the delivery of agreed SRN impacting infrastructure in connection with the overall LPR. This will also include updates IDP documentation regarding how SRN infrastructure fits into the wider picture of infrastructure requirements and delivery. National Highways stands ready to participate in and agree the revised wording as part of any Modifications consultation or by other means.

Signatories

All signatories agree that this statement is an accurate representation of areas of agreement and disagreement between the two parties.

Signed:

Name:

Position:

Maidstone Borough Council

Date:

Signed:



Name: Kevin Bown

Position: Area 4
Spatial Planning Manager

National Highways

Date: 23 May 2023