

<b>For attention of:</b>	Lenham Parish Council
<b>Consultation:</b>	Lenham Parish Council – Neighbourhood Development Plan – Regulation 16 Consultation
<b>Highways England's Reference:</b>	██████

Dear Sirs,

Thank you for your letter (██████████), received 13 February 2020, inviting Highways England to comment on the above Neighbourhood Development Plan and indicating that responses were required no later than 26 March 2020.

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 plans or proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case particularly the M20 in the vicinity of Junction 8 and Junction 9.

We have assessed the submitted information available on the Maidstone Borough Council website and respond as follows:

<b>Document reference</b>	<b>Document title</b>	<b>Highways England Response</b>
LNP2	Regulation 16 Submission Version of the Lenham Neighbourhood Plan	See Separate table
LNP6	Masterplanning Report	No comments at this time, but we would wish to be involved as the process evolves
LNP8	Transport Assessment	No comments at this time. However, we request that individual TA's are submitted with planning applications for Strategic Sites covering traffic impacts on the SRN (J8 and J9). As respective plans progress they may need to include sensitivity tests regarding the emerging Heathlands development that proposes a new junction onto M20 in the vicinity of Lenham.
LNP11	Housing Needs Assessment	No comments

<b>Lenham Neighbourhood Plan Reference</b>	<b>Subject</b>	<b>Highways England Response</b>
General comment	Housing Allocation/ Transport Evidence Base	<p>We note that the LNP</p> <ul style="list-style-type: none"> <li>• allocates 1,000 homes (until 2031) through 7 Strategic Housing Delivery Sites, in line with MBLP; an additional 364 homes in Lenham are allocated through committed development.</li> <li>• is silent on the emerging Heathlands Garden Community (&gt;5,000 units) proposals under the Maidstone Local Plan Review, that includes a new M20 junction, at Lenham Heath, which is approx. 2.5 miles to the southeast of Lenham.</li> </ul> <p>Therefore as both plans progress they will need to take each other into full consideration in order to produce their respective, robust, up-to-date and relevant transport evidence bases.</p>
General comment	Transport Evidence Base	<p>The nearest SRN junctions to Lenham are M20 Junction 8 (+10 miles west) and Junction 9 (9 miles east). It is likely that traffic generated by the development sites accessing the SRN to travel north towards Maidstone, would do this via Junction 8. Likewise, any traffic generated and travelling south towards Ashford and Folkestone would join the SRN at Junction 9.</p> <p>The evidence base will therefore require an assessment of the individual and cumulative impacts of the proposed sites and other development on these junctions. The evidence will need to take account of the existing adopted Maidstone Local Plan and any other commitments since it's modelling was produced.</p> <p>While it is anticipated that most traffic generated via the NLP will use M20J8 and that it has some spare capacity, the evidence base will still need to demonstrate whether the impacts can be absorbed or NLP/ LP led improvements will need to be carried out. Therefore If this is the case, the NLP will need to demonstrate how the NLP led improvements will translate into requirements for each allocation and/or other site coming forward.</p> <p>Equally, while M20J9 has capacity, it was intended to be used by Ashford Core Strategy/</p>

		<p>Local Plan led development. Therefore under the Duty to Co-operate the LNP will need to take account of other plans as part of its own impact assessment and mitigation requirements.</p> <p>We note that Maidstone BC are working with Kent CC to produce a Kent transport model. It may be that the model can be used as part of the required evidence base for the LNP.</p>
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In the meantime any planning applications submitted within the Lenham Neighbourhood Development Plan area, will probably be required to provide a full transport assessment including the modelling impacts of proposed trip generation and any mitigation measures required onto the SRN, M20 Junction 8 and 9. This is in order to demonstrate that the proposals will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para's 9 & 10 and MHCLG NPPF para 109) in this location and its vicinity.

We hope these comments assist and commit to continuing to work with the council and others as the Plan evolves.

Should there be any queries regarding this response, please contact the team at

[Redacted]

Kind Regards,

**Kevin Bown**

[Redacted]

Web: <http://www.highways.co.uk>