

Examination of the Tunbridge Wells
Borough Local Plan

Tunbridge Wells Borough Council
Hearing Statement

**Matter 12: Transport
Infrastructure (Policies STR6,
TP1, TP2, TP3, TP4, TP5 and
TP6)**
**Issue 1: Effects of Local Plan
Growth**

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Matter 12 – Transport Infrastructure (Policies STR6, TP1, TP2, TP3, TP4, TP5 and TP6)

Issue 1 – Effects of Local Plan Growth

Inspector’s Question 1: [re. consideration of transport issues]

Have transport issues been considered at the earliest stages of plan-making, as required by paragraph 104 of the Framework?

TWBC response to Question 1

Introduction

1. Paragraph 104 of the NPPF sets out, in full:

“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

a) the potential impacts of development on transport networks can be addressed;

b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;

c) opportunities to promote walking, cycling and public transport use are identified and pursued;

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places”.

2. The Council considers that transport issues have been considered from the earliest stage of plan making, and through-out the plan making process. There is considerable guidance in the [Planning Practice Guidance](#) on the preparation of a transport evidence base for a Local Plan: this guidance has been followed in the preparation of the Local Plan.

Iterative approach

3. Paragraph: 004 Reference ID: 54-004-20141010 of the PPG sets out that the transport assessment of the Local Plan should be an iterative process, and become more refined and details as the process draws to a conclusion. This has been the case with the Local Plan. It specifically set out:

“When should the transport assessment of the Local Plan be undertaken?”

An assessment of the transport implications should be undertaken at a number of stages in the preparation of a Local Plan:

- *as part of the initial evidence base in terms of issues and opportunities*
- *as part of the options testing*
- *as part of the preparation of the final submission....”*

Borough and County Strategies and Guides

4. At the early stages of the Plan making process, there were several recently adopted transport strategies, namely the Cycling Strategy 2016 – 2026 (TWBC and Kent County Council (KCC), 2016) [[CD. 3.46](#)], the Transport Strategy 2015 – 2026 (TWBC and KCC, 2015) [[CD 3.51](#)] and the Parking Strategy 2016 – 2026 [[CD 3.49](#)]. These strategies – including several produced jointly with the KCC as the Highways and Transport Authority - provided the Council with clear information on matters such as the following, all of which are important in developing a transport base (PPG Paragraph: 003 Reference ID: 54-003-20141010):
- opportunities to reduce the need for travel where appropriate
 - opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate
 - identification of the short, medium and long-term transport proposals across all modes.
5. A little later in the plan making process (2017), KCC adopted its Local Transport Plan 4, which again provided updated and further information in relation to the above – and still at a relatively early stage of the plan making process. This provided information at the strategic - county level – which is of importance given the movement of vehicles across borough boundaries (i.e. across the plan area and wider), and includes matters such as

freight. It also provided information on gaps in the networks in the short, medium and longer term (PPG Paragraph 005 Reference ID: 54-005-20141010).

6. Reflecting the development of further strategies and the emerging evidence base over the early stages of producing the Local Plan, the Council produced a Transport Strategy Review: Context and Way Forward [[CD 3.52](#)]. The Council has continued to engage heavily with other wider (county or regional) emerging strategies, including the [Kent Design Guide](#) and [Transport for the South East](#).

The Sustainability Appraisal(s)

7. Travel has been a Sustainability Objective in the Sustainability Appraisals (SA), from the Draft SA Issues and Option Report (May 2017) [[CD 3.7](#)] and specifically “*Improve travel choice and reduce the need to travel by private vehicle*”. The decision aiding questions (page 39) relevant to this Sustainability Objective are “*does the Policy/Plan/Objective:*

...support priority transport projects?

...prioritise easy access to train stations within and outside the borough?

...improve rural bus services and retain viability of urban bus services?

...support opportunities for active travel including cycling and walking?”
8. In relation to criterion d) of paragraph 104 of the NPPF (environmental impacts of traffic and transport infrastructure), the SAs also include the following relevant objectives (amongst others), and associated decision aiding questions:
 - Air: Reduce air quality;
 - Climate Change & Energy: Reduce carbon footprint and adapt to predicted changes;
 - Noise: Reduce noise pollution;
9. SAs have been undertaken at all relevant stages of the Local Plan – and as such transport issues have been assessed from the earliest stage of producing the Local Plan – including as part of the consideration of the issues and opportunities, and as part of the testing of the options which fed into the proposals set out in the Draft Local Plan. Through the rigorous SA process, the Local Plan making process has considered transport issues such as assessing “*the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport*” (PPG Paragraph 003 Reference ID: 54-003-20141010).

10. The subsequent SAs which have been undertaken, and considered transport issues, include the Interim SA for Issues and Options stage May 2019 [[CD 3.7b](#)], the SA for Draft Local Plan (September 2019) [[CD 3.11](#)] and SA for Regulation 19 consultation [[CD 3.62](#)].

Detailed Technical Transport Assessment

11. In accordance with Paragraph: 004 Reference ID: 54-004-20141010 of the PPG the transport evidence base has become more refined as the Local Plan has progressed. In particular, the Council commissioned considerable technical transport assessment work following the Issues and Options stage, to inform the Draft Local Plan and then subsequently the Pre-Submission Local Plan.

12. This technical assessment work was undertaken in accordance with guidance in the PPG including in relation to:

- the baseline (PPG Paragraph: 005 Reference ID: 54-005-20141010),
- the detailed information set out at Paragraph: 006 Reference ID: 54-006-20141010 of the PPG;
- using area wide models based on robust (pre covid pandemic) data (PPG Paragraph: 007 Reference ID: 54-007-20141010), and assessment of scenarios and the impact of proposed allocations (PPG Paragraph 008 Reference ID: 54-008-20141010);
- safety (Paragraph: 009 Reference ID: 54-009-20141010).

13. The detailed technical work to inform the Draft Local Plan included the Tunbridge Wells Park and Ride Feasibility Study by WSP (2018) which was commissioned by TWBC and KCC [[CD 3.53](#)], and the Local Plan Transport Evidence Base: Transport Assessment Report (2019) by SWECO [[CD 3.48](#)].

14. Significant further technical work was undertaken post Draft Local Plan. In particular this developed the work undertaken to inform the Draft Local Plan, and tested areas identified in the Draft Local Plan evidence base, including through analysis of representations made on this, where it was considered that more information, and more surety was required. This included in terms of:

- the ability to promote walking and cycling through the Local Cycling and Walking Infrastructure Plan Phase 1 [[CD 3.115a\(i\)](#)] and Phase 2 [[CD 3.115b\(i\)](#)] (by Phil Jones

Associates, 2021). These included specifically assessing the ability to provide low traffic neighbourhoods at Royal Tunbridge Wells and Southborough given the transport issues identified in these settlements through the earlier evidence work, and at Paddock Wood given the scope for strategic development there. They also assessed the ability to provide inter-urban links between the two strategic settlements and Royal Tunbridge Wells/Southborough and Tonbridge, again to test key areas identified in earlier evidence;

- testing and refining access and movement infrastructure for the strategic sites, undertaken by Stantec (in together with SWECO) as part of wider masterplanning work for the strategic sites, for example as set out in the Access and Movement Report which formed part of the Strategic Sites Masterplanning and Infrastructure Study [CD 3.66, and specifically [CD 3.66e\(i\)](#)];
- the work undertaken included identification of the costs of mitigation measures for the strategic sites, including physical infrastructure, required to accommodate the growth. This in itself was subject to viability testing through the Viability Assessment Stage 2 [[CD 3.65a](#)], which demonstrates that the mitigation measures are deliverable and that their provision can be funded by the development of the strategic sites whilst delivering the level of affordable housing indicated in the policy, without causing them to be unviable.

15. The Local Plan Transport Evidence Base: Transport Assessment Report Update for the Pre-submission Local Plan (2021) [[CD 3.114](#)] represented – together with the studies outlined above - the most refined and detailed elements of the transport evidence base. The Transport Assessment Report Update specifically assessed, through a Saturn highway model, the impacts of growth, as compared to a reference case. It identified opportunities for changing transport technology – including electric bicycles and non-traditional forms of bus provision, together with opportunities to promote walking, cycling and public transport – and the ability to prioritise these. This is reflected in the second point of Strategic Policy STR 6 which prioritises active travel and public transport, whilst ensuring that there are necessary improvements to the highway network.

16. The outcomes of this, and earlier, evidence base work has (together with detailed discussions under the Duty to Cooperate with transport providers) led to the development of the Infrastructure Delivery Plan, which is a live document and has been updated

continually through out the Local Plan making process. The version which supports (and informs) the Pre-Submission Local Plan is [CD 3.71](#).

17. The Council has undertaken further technical assessment following the Pre-Submission Local Plan. This includes the TW Local Plan Sensitivity Test Addendum Report with Appendices [[PS 023](#)] and the Local Capacity Modelling Appraisal Technical Note [[PS 024](#)]. The reasoning for this is set out in more detail in response to Question 2 below.
18. Other work includes technical assessment and design of bus priority and cycling infrastructure measures on the Pembury Road in Royal Tunbridge Wells, rapid bus transport routes from Paddock Wood via Tudeley to Tonbridge, and joint work (with Tonbridge and Malling Borough Council and Kent County Council) on a VISSIM model for Tonbridge.
- Working with Duty to Cooperate partners.
19. In accordance with paragraph 106 b of the NPPF, the local plan has been “*prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils*”. This is also reflective of the guidance in the PPG that “*the transport assessment should be produced at a Local Plan level in partnership with all relevant transport and planning authorities, transport providers and key stakeholders*” (Paragraph: 005 Reference ID: 54-005-20141010). This is reflected in the Statements of Common Ground signed with neighbouring authorities, East Sussex and Kent County Council, National Highways and Network Rail.
20. There has been particularly active involvement of KCC as the local highway and transport authority. This has included joint workshops to ensure that safe vehicular access can be taken to allocation sites, iterative working to satisfactorily address queries raised by KCC as to the evidence base – please see question 2 - and to work closely with National Highways on areas where the local road network intersects with the strategic road network.
21. It is important to note that KCC are – together with National Highways – the highway authority for all authorities in Kent. This includes those authorities which neighbour Tunbridge Wells, and have raised some concerns regarding the impact of development

set out in the Local Plan, although have seemingly not instructed their own independent consultants. Further information on this will be provided in response to Question 2.

Conclusion

22. As set out above, transport issues have been considered from the very earliest stages of plan making, and at each and every stage. The Council has actively engaged and worked with relevant Duty to Cooperate partners, and has developed a robust evidence base, testing areas where more surety was required either by the Council or by the highway and transport authority. This consideration has informed the development of the Local Plan at each stage.

23. As a result of this work the Council considers that the distribution of development, proposed allocations, and strategic approach to transport are in accordance with the relevant policies in the NPPF, including that set out in paragraphs 104 – 107 and 111.

Inspector's Question 2: [re. development impacts]

How have the potential impacts of the development proposed in the Plan been tested, and how will the necessary highways mitigation be delivered? Is it clear to decision-makers, developers and local communities what will need to be provided, when and by whom?

TWBC response to Question 2

How have the potential impacts of the development proposed in the Plan been tested?

24. As set out in response to question 1, the Council's transport assessment – the evidence base – has been developed iteratively.
25. In particular, it has involved – through the Local Plan Transport Evidence Base: Transport Assessment Report Update for the Pre-submission Local Plan (2021) [[CD 3.114](#)] – the assessment of the impacts of the proposed growth on the transport network using an AM and PM SATURN model. As set out at paragraph 3.9 of the SoCG between TWBC and KCC [[PS 025](#)], this “*provides a core model simulation network centred around the key settlement areas of Royal Tunbridge Wells, Pembury, Tonbridge and Paddock Wood. The Base Case has been set out using surveys undertaken from 2018/2019 and includes projected growth up to the end of the Local Plan (2038)*”. Growth in the SATURN model was based on the TEMPro approach.
26. This has been subject to consideration and testing by KCC and National Highways, supported by their own consultants.
27. As set out in the SoCG at paragraph 3.11 that “*detailed discussions took place with KCC (and National Highways (NH)) ahead of and during the Regulation 19 consultation. As a result of these discussions (referred to in KCC's Regulation 19 consultation response), NH and KCC requested further sensitivity modelling be undertaken. This included a request that this sensitivity modelling is undertaken using the TRICS approach – whereby all sites are assessed individually*”.
28. This is essentially the answer to Question 3: the subsequent reports were undertaken in order to address queries and comments raised by the highway authorities on the original evidence base, including a request that a further scenario be modelled. Accordingly TWBC's consultants undertook a Local Plan – Transport Assessment Addendum 2 report

(October 2021). This used the TRICS approach and is supplemental to the Local Plan Transport Assessment Report. This has been provided as [PS_023](#). The October 2021 Report includes further modelling that covers a scenario which KCC considers should be assessed (no reduction in trip rates from existing residents of Paddock Wood as a result of mitigation measures and inclusion of mitigation measures for consented schemes in the base case scenario). As set out at paragraph 3.15 of the SoCG *“the TRICS based trip rates were agreed with KCC and NH (paragraph 1.1.6), and the overall approach to the sensitivity testing modelling has been agreed with KCC and NH”*.

29. This was, again, subject to review and consideration by KCC and National Highways (and relevant consultants).

30. Again, as set out in the SoCG (at paragraph 3.16 and 3.17):

“3.16 Following KCC’s review of the Addendum 2 report, KCC (in liaison with NH) requested further detailed sensitivity testing of those junctions that are most likely to require capacity improvements to accommodate Local Plan growth at the strategic level, based on the outputs of the strategic traffic modelling and sensitivity testing.

3.17 Accordingly a Local Junction Capacity Sensitivity Testing Technical Note (March 2022) has been produced. This forms Core Document CD 3.167 of the TWBC Local Plan Examination. This Technical Note demonstrates the results of ARCADY or LinSig modelling of these junctions and that these junction works can be undertaken on land under in highways ownership in accordance with relevant DMRB requirements”.

31. This has again been subject to review and consideration by KCC and National Highways.

What is the result of this testing?

32. Paragraphs 3.20 and 3.21 of the SoCG set out the results of the Council’s testing through the sensitivity testing (and Local Plan evidence base), and the relevant transport authorities testing of this:

- *“KCC and TWBC agree that the sensitivity testing, using TRICS combined with ARCADY and LinSig modelling of individual junctions, has confirmed that the original strategic modelling undertaken and the mitigations identified in the Local Plan Evidence Base: Transport Assessment Report Update for the Pre-Submission Local Plan (Transport Modelling report) can effectively mitigate any significant impacts from*

the development on the transport network in terms of capacity and congestion, or on highway safety, to an acceptable degree. These mitigations are reflected in the Infrastructure Delivery Plan”.

- *“KCC is satisfied that, in terms of the level of detail that is required at the Local Plan stage, the evidence is proportionate and demonstrates that the highway mitigations are deliverable. Both TWBC and KCC recognise that the transport impacts of each of the Local Plan developments will still have to be assessed through the relevant transport assessments accompanying planning applications, in accordance with the NPPF”.*

33. The SoCG is clear: the testing undertaken by the Council as part of preparing the Local Plan (i.e. to inform the Pre-Submission Local Plan) was robust. This, as does the further sensitivity testing, demonstrates that the growth proposed in the Local Plan will not have an unacceptable impact on highway safety, and that it will not have a severe residual cumulative impacts on the road network.

34. The Council has been in discussion with National Highways. It considers the same. An updated SoCG is expected to be provided in week commencing 13th June 2022.

Is it clear to decision-makers, developers and local communities what highway mitigations will need to be provided, when and by whom?

35. The Council considers that it is clear to the above, what mitigations will need to be provided, when, and by whom. The key document in which this is set out is the Infrastructure Delivery Schedule, set out at Appendix 1 of the Infrastructure Delivery Plan [[CD 3.142](#)]. The Schedule identifies by settlement/parish what is required to be delivered, the body which will be delivering it, and the indicative cost of providing it. It also sets out the time scales in which it will be needed, with further information provided on this at page 13 of the Infrastructure Delivery Plan.

36. The “STR” policies for each parish within the Local Plan list – in broad terms - the infrastructure that will be required to be delivered, either in kind or through a monetary contribution. Through cross referring to the Infrastructure Delivery Schedule decision makers, developers and local communities can ascertain further details of the mitigations

that will be required, when it will be required, the indicative cost of it and who it will be provided by.

37. It will then be the case the exact level of contribution towards that infrastructure or mitigation will be identified through the relevant transport assessment at planning application stage.
38. It is pertinent to note that for the Strategic Sites further information on what mitigation measures will be required is set out in Strategic Sites Masterplanning and Infrastructure Study (SSMIS) [[CD 3.66](#)], and as set out in paragraphs 5.194 and 5.229 that “*the assignment of contributions will be further refined through the Supplementary Planning Documents to be prepared for each Strategic Site*”.
39. The SSMIS sets out a complete schedule of infrastructure required to support the delivery of the proposed settlements at Tudeley Village (STR/SS3), and at Paddock Wood and east Capel (STR/SS1). This infrastructure has been identified to mitigate the impacts of the growth and deliver the growth on garden settlement principles, a key policy requirement for both sites. The schedule has been compiled through ongoing engagement with key infrastructure providers.
40. The SSMIS looked at the provision of infrastructure under three scenarios, with the infrastructure provision for each scenario is set out in Tables 11 (pg 132), 13 (pg 138) and 15 (pg 142):
- Scenario A: both STR/SS1 and STR/SS3 being delivered (the assumption taken forward through the Local Plan);
 - Scenario B: just STR/SS1 Paddock Wood and east Capel coming forward; and
 - Scenario C: just STR/SS3 Tudeley Village coming forward.
41. Focusing on Table 11, which reflects the Local Plan position, the table is split into three sections: shared infrastructure required and funded by both sites, infrastructure to be funded by development at Paddock Wood, and infrastructure to be funded by development at Tudeley Village. The Schedule also includes broad phasing assumptions as follows:
- a. Short- Phase 0- before 2024 (i.e. before development commences)

- b. Medium- Phase 1/2 -2025-2032
- c. Longer- Phase 30 beyond 2032.

42. The Council has already undertaken considerable work in preparation for the Supplementary Planning Documents for both strategic sites, identifying more specifically the quantum of development that would “trigger” the need for the mitigation to be provided, which when compared to the housing trajectory provides a year for the mitigation to be provided. If it would assist the Inspector, this information can be provided ahead of the hearing session.

43. Accordingly, through the Infrastructure Delivery Strategy and Plan, evidence base such as the SSMIS, and Supplementary Planning Documents, it is clear what highway mitigations will need to be provided, when and by whom.

How will the necessary highways mitigation be delivered?

44. The Local Capacity Modelling Appraisal Technical Note [[PS 024](#)] identifies that the majority of highway mitigation works not associated with the strategic sites can be undertaken on land under highways ownership, in accordance with relevant Design Manual for Roads and Bridges compliance.

45. The vast majority of highway mitigations will be delivered by the relevant highway authority, funded by developer contributions.

46. As set out at paragraphs 3.27 and 3.28 of the SoCG with KCC the Viability Stage 1 Assessment [[CD 3.54](#)] undertaken by Dixon Searle for the non-strategic sites “*indicates that both residential and employment development are viable when meeting other policy requirements (including affordable housing) and the ability to provide considerable contributions towards the provision of infrastructure. Paragraph n of the Executive Summary on page viii) of CD 3.54a effectively identifies that (on the basis of the average house size being 90-100 sqm) that policy compliant (noting the difference in affordable housing requirements between previously developed and greenfield land) residential development should be able to provide a financial contribution of c.£12,000 - £18,000 per dwelling towards infrastructure provision. This compares to the average contribution per dwelling on a variety of sites in the borough which have gained planning permission in recent years, with the vast majority of which (such as the three residential sites in*

Paddock Wood which provide contributions for significant transport infrastructure) being less than this range...”

47. Accordingly, most physical highway mitigations will be undertaken by the relevant highways authority, on highways land, funded by development.
48. There is one junction – the Blackhurst Lane/A264 Pembury Road/Hall’s Hole Road junction – where it will be necessary to acquire additional land to provide the roundabout. The Council has already committed to use its Compulsory Purchase Order powers (if necessary) to acquire relevant land. TWBC and KCC have agreed (as set out at para 3.18 of the SoCG) to the principle of working cooperatively on Compulsory Purchase Orders, if considered necessary.
49. For the strategic sites, the Stage 2 Viability Assessment, 2021 identifies that the strategic sites, despite the significant infrastructure required for these to be delivered on garden settlement principles, are viable. Further sensitivity testing has been undertaken given the length of time since the original work has been undertaken: this demonstrates that the sites remain viable.
50. Some of the highway mitigations for the strategic sites, including works to the A228, the provision of part of the offline highway route for the A228, works to the B2017 and the provision of the road bypassing Five Oak Green will require the acquisition of land outside of KCC Highways and Transportation ownership. Some of this can be provided on land under the ownership of the Hadlow Estate, who are the landowners for STR/SS3 Tudeley. The landowners have agreed that they will provide the relevant land for these mitigations.
51. Other elements of the highway measures will involve the Council, working with KCC, acquiring this land. The Council has set out its commitment – if necessary – to use its Compulsory Purchase Order powers. This is reflected in Policy STR4 Ensuring Comprehensive Development. The Council also has recent experience of using Compulsory Purchase Order powers, and has a Strategic Sites and Delivery team established to take forward such measures, if necessary.
52. The Council has also prepared a detailed timetable for the preparation and determination of a planning application, and the actions required in relation to Compulsory Purchase, including Inquiry if necessary, and build programme. It has detailed of relevant land owners, and costs for land acquisition. KCC agrees with these timetables, having

significant experience of the delivery of highway measures through CPO. The Council has already established – with KCC – which powers would be used for Compulsory Purchase. If it would assist the Inspector, these can be provided ahead of the Examination session.

53. In terms of other transport measures, such as enhancements to bus provision, etc: the Council has established strong working relationships with the bus providers, and has significant experience of receiving contributions from developers and working with the bus providers to provide such enhanced public transport.

Conclusions

54. The above demonstrates that the Council has prepared a robust evidence base which tested the highways measures, and itself has been subject to testing by the relevant highways and transport authorities and their consultants. The Infrastructure Delivery Plan, together with other evidence and future SPDs provides clarity on what measures are required, by when, their costs and who will provide them.

55. The Council is also clear as to how measures will be provided, and that the timescales and costs (including – potentially – for Compulsory Purchase) have been factored into the housing trajectory and viability assessments.

Inspector's Question 3: [re. additional reports]

What are the reasons for the preparation and submission of the Local Plan Sensitivity Test Addendum Report¹ and the Local Junction Capacity Sensitivity Testing Technical Note²?

TWBC response to Question 3

56. This question has been addressed through responses to Questions 1 and 2.

57. It should be noted that the Council also produced an Addendum Report (September 2021). This has not been provided to the Examination as it was superseded by the Local Plan – Transport Assessment Addendum 2 report (October 2021), although the Council has provided a copy of it to interested parties if requested.

¹ Examination Document PS_023

² Examination Document PS_024

Inspector's Question 4: [re. transport measures for growth]

Does the additional transport evidence support the level of growth proposed in the Local Plan and demonstrate that the necessary mitigation measures are achievable?

TWBC response to Question 4

58. A relatively brief response will be provided to this question, as it has been addressed in the responses to Questions 1 and 2 above.

59. The TW Local Plan Sensitivity Test Addendum Report with Appendices [[PS_023](#)] and the Local Capacity Modelling Appraisal Technical Note [[PS_024](#)], together with the information provided by the Council as to how it will deliver the relevant highway works and other measures – including if needed through Compulsory Purchase - does demonstrate that the necessary mitigation measures are achievable. Further information in relation to the timescales and means to acquire land which is not within the control of the highway and transport authority can be provided if it would assist the Inspector.

60. However, it is important to note that the “additional transport evidence” was undertaken in order to sensitivity test the transport evidence which informed the preparation of the Pre-Submission Local Plan. As confirmed in the SoCG with KCC – for example at paragraph 3.20 – the highway and transport authority has confirmed that *“the original strategic modelling undertaken and the mitigations identified in the Local Plan Evidence Base: Transport Assessment Report Update for the Pre-Submission Local Plan (Transport Modelling report) can effectively mitigate any significant impacts from the development on the transport network in terms of capacity and congestion, or on highway safety, to an acceptable degree”*.

Appendix 2: Title