FHDC EX087

# **Core Strategy Review -Inspectors' Action Points**

Matter 7a – Strategy for the North Downs Area and the New Garden Settlement – Update for Inspectors

18 June 2021



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# Matter 7a – Update for Inspectors, June 2021

#### 1. Introduction

- 1.1. This additional document has been prepared to provide an update to the Inspectors for the Core Strategy Review in relation to the following points:
  - A summary of the updated position between the Council and Highways England;
  - Updates on costs and funding arrangements for mitigation;
  - Effect on timescale and phasing of the New Garden Settlement;
  - Effect on viability and delivery including any revised viability assessments; and
  - Suggested main modifications to address matters
- 1.2. These points are addressed in the sections that follow.

## 2. Summary of Updated Position Between the Council and Highways England

#### Introduction

- 2.1 Since the hearing sessions dealing with Matter 7, the New Garden Settlement, in January 2021, the district council and Highways England, together with Kent County Highways, have been working together to fine-tune the modelling to produce mitigation designs for each of the affected strategic road network junctions (namely M20 Junction 11, M20 Junctions 12 and 13 and the A20/A260 junction). Work has also assessed impacts on, and any necessary mitigation to, the local road network.
- 2.2 Section 5 of the most recent Statement of Common Ground between the district council and Highways England (<u>FHDC EX083</u>) sets out in more detail what has been agreed. This is set out in summary below.

#### M20 Junction 11

- 2.3 It is agreed that the Core Strategy Review, including proposals for the new garden settlement will have impacts on Junction 11 of the M20 and that these impacts will need to be mitigated.
- 2.4 The agreed modelling demonstrates that both networks should be able to accommodate incidents and Otterpool traffic up to the end of the plan period in 2036/37, although some mitigation (such as signalling) would be required to help manage flows at the A20 Sellindge railway bridge signals. The agreed design does not impact on the bridge or the Highways England depot access.

#### M20 Junctions 12 and 13

2.5 It was agreed that the Core Strategy Review including the new garden settlement has the potential to impact on M20 Junctions 12 and 13 and that impact would need to be mitigated. The merge and diverge modelling and how this interacts with the local road network was agreed (see Appendix 16 of the

Statement of Common Ground). It has been confirmed by Highways England that the proposed mitigation works for Junctions 12 and 13 are technically and physically feasible.

- 2.6 The following is being undertaken as further work to progress the scheme design:
  - Technical design and scheme costing of the proposed arrangements is being completed by Arcadis (the consultancy undertaking the highway modelling); and
  - Discussions concerning funding arrangements to deliver the required scheme of mitigation are evolving, but there is sufficient confidence that these works could be funded.

#### A20/A260

- 2.7 Highways England and the district council have agreed that the Core Strategy Review including the new garden settlement has the potential to impact on the A20/A260 junctions and that impact needs to be mitigated.
- 2.8 It was agreed that the modelling and mitigating the impact on the junction should consider the interplay of three junctions that form the A20/A260 interchange, together with the traffic flows on the M20 within the Roundhill Tunnel.
- 2.9 Highways England and Kent County Highways have agreed to the principle of a suite of mitigations to the three junctions that form the A20/A260 interchange. These mitigation works would deliver an ultimate solution for the interchange to accommodate future growth including Otterpool Park. It was also agreed that, in accordance with normal development management practice, the full details will be worked up via the planning application for the new garden settlement (Otterpool Park) and agreed.

- 2.10 The district council and the promoters of the Otterpool development proportionately have agreed to fund the, to be finalised, A20/A260 suite of works.
- 2.11 It should be noted that Highways England, Kent County Highways and the district council also agreed that a cautious approach would be taken to this junction and that the one mitigation scheme which has been tabled is considered to work in practice.
- 2.12 It is also recognised that, through further work and monitoring, an alternative mitigation scheme may be acceptable. It is likely that Highways England and Kent County Highways will, over the coming years, also review their respective networks and may also carry out works in the vicinity of the A20/A260 junction.

#### **Other Policies – Policy SS5: District Infrastructure Planning**

- 2.13 Highways England and the district council have also agreed additional wording in relation to Policy SS5 and the supporting text of the Core Strategy Review (see proposed main modifications below).
- 2.14 The main modifications have been proposed to ensure that 'critical' and 'necessary' infrastructure needed to support the spatial strategy is stated as being set out in the Infrastructure Delivery Plan (IDP).
- 2.15 As a result of both the general and specific junction engagement, it was agreed by Highways England and the council that a 'Monitor and Manage Framework' should be created to form a part of the suite of Core Strategy Review, Infrastructure Delivery Plan and other documents.

#### **Summary of Actions**

- 2.16 It has been agreed by both parties that:
  - They will continue to liaise and work together on all relevant matters relating to the Strategic Road Network, including planning applications;

- They will continue to work up the details of the agreed approach to provide the maximum possible information and evidence to the examination, but without changing any matters that might prejudice the examination process or stakeholders ability to participate in it; where appropriate, this will include a final version of the mitigation works for eastbound at junction 13;
- The district council will import the 'monitor and manage' strategy into its Authority Monitoring Report in the event that once (and assuming) planning permission is granted for the new garden settlement at Otterpool Park;
- Highways England will be provided with annual data outputs concerning traffic flows on the Strategic Road Network generated by the new garden settlement at Otterpool Park.

### 3. Update on Costs and Funding Arrangements for Mitigation

- 3.1 The need for and deliverability of the potential additional highways mitigation requirements are set out in the other sections of this statement.
- 3.2 In summary, through the preparation of the Statement of Common Ground, Highways England have identified the potential requirement for additional mitigation work between M20 Junction 12 to Junction 13 in the form of a Type B diverge coastbound to J13.
- 3.3 Highways England's position is that the Core Strategy Review development traffic alongside the constrained motorway network at this location will result in the need for mitigation. The modelling shows that only a relatively small proportion of the additional traffic on this part of the strategic network will be generated by the garden settlement.
- 3.4 For the Core Strategy Review examination, if the need for these additional works is triggered through the 'monitor and manage' approach, there would be the potential of additional infrastructure costs, which is only partly attributable to the new garden settlement and the other allocations in the Core Strategy Review, as the need for the intervention is also the product of traffic growth arising from general background traffic growth. Prior to the examination resuming, the council will provide the Inspectors with a range of likely costs for the mitigation.
- 3.5 If required, it is justifiable to attribute a proportionate contribution of the costs of the mitigation of M20 Junction 12 to Junction 13 to the new garden settlement and this can be paid for through the development without affecting its viability (estimated to be about 30 per cent).
- 3.6 Transport modelling by consultants Arcadis, in support of the garden settlement proposals, predicts that the M20 Junction 12 to Junction 13 mitigation will not be triggered until no earlier than 2031. Arcadis' work on

behalf of the Council indicates that an alternative and cheaper scheme to Highways England's preferred type B merge coast-bound solution will also be feasible and effective in dealing with local plan growth and background growth. Given the timescales involved, the Council is of the view that the monitor and manage approach will afford ample time over which to review the requirement for mitigation and the eventual form it should take, taking into account the requirements of Highways England at that time.

3.7 Should these requirements be triggered, the proportion of the costs not attributable to the development of the new garden settlement could be met through a number of sources, outlined below.

#### **Area-based Developer Contributions**

- 3.8 Should it become necessary, through the 'monitor and manage' approach, the district council has the ability to forward-fund the junction improvements and recoup the investment through area-based developer contributions.
- 3.9 The district council will if necessary explore opportunities to establish a funding package to assist with implementation of the M20 Junction 12 and Junction 13 and/or A20/A260 scheme of mitigation to make up any shortfall in funding. Specifically, the Council could seek to levy proportionate developer contributions through Section 106 Agreements based on a new policy addition that would be brought in as part of the Local Plan review as a means of providing the policy foundation by which to recoup these expenses.
- 3.10 Suitable and robust transport evidence would need to be gathered as part of a dedicated study to determine the overall quantum of traffic that could be assigned to new growth (to include windfall development) in order to set the parameters of the developer contributions that would be secured in future.
- 3.11 This approach was successfully adopted by Ashford Borough Council as Supplementary Planning Guidance *'Providing for Transport Needs Arising from the South of Ashford Transport Study'* (SPG6) to fund strategic highways and transport infrastructure, to include the M20 Junction 10 interim scheme

that was forward-funded by Park Farm, south Ashford as 'Lead Developer' under SPG6. Ashford Borough Council levied proportionate developer contributions to a package of transport-related measures in the south Ashford area through Section 106 agreements based on SPG6, as well as to recoup (and repay) the forward funding component provided by the Lead Developer.

#### **Community Infrastructure Levy (CIL)**

- 3.12 As of the end of the 2020/21 tax year (up to 5 April 2019), the district council had collected £1,027,521 in CIL receipts.
- 3.13 A further £2.5m of CIL receipts are expected from development which has been granted planning permission, but the consent has not yet been implemented to trigger the CIL payment.
- 3.14 Up to a further £7m is expected from sites that are allocated within the adopted Places and Policies Local Plan (PPLP). A number of sites that benefit from a proposed allocation in the PPLP have already been granted planning permission and are coming forward to implementation.
- 3.15 Under the approved governance arrangements (July 2020) the equivalent of 35 per cent of CIL receipts are to be transferred to Kent County Council to support county services. Discounting the locally assigned proportion and allowance for administration, this would leave 45 per cent of CIL receipts to be the subject of the internal procedure for approval, and the district council has the ability to dedicate a large apportionment of these receipts to assist in the delivery of key strategic highway infrastructure; the profiled figure is £4.737 m to be available to the district council by 2031. The district council will seek to have discussions with KCC to understand if they would be prepared to dedicate a proportion of their CIL receipts towards the delivery of key strategic highway infrastructure.
- 3.16 The funding opportunities that could materialise through CIL to assist in the delivery of key strategic highway infrastructure will be appropriately referenced within the 2021 Infrastructure Funding Statement. It is considered realistic that

CIL receipts could assist in funding a material proportion of the A20 / A260 mitigation package.

#### **Potential Additional Funding Sources**

- 3.17 There are a range of alternative funding sources that the council could explore, as outlined below.
- 3.18 The policy paper 'Levelling Up Fund: Prioritisation of places methodology'<sup>1</sup> sets out the methodology used to develop an index of priority places for the Levelling Up Fund. The methodology was developed to help the Fund deliver its core objective of investing in local infrastructure that has a visible impact on people. One of the Fund's objectives is to improve local transport connectivity and infrastructure, including upgrades to local bus, road and cycle infrastructure. Other objectives are to deliver town centre and high street regeneration and maintain and regenerate civic, cultural and heritage assets.
- 3.19 The index places local authorities into categories 1, 2 or 3, depending on their identified level of need, with category 1 representing places deemed in most need of investment through the Fund. Folkestone & Hythe District has been classified as priority 1 area within the Levelling Up Fund index, therefore this would provide an excellent weighting to a county-wide bid to the Fund should the scheme of mitigation required to the M20 corridor, and specifically the M20 Junction 12 to Junction 13 proposal, be put forward under a future funding round.
- 3.20 Regarding other sources of funding, Highways England has a £15 billion investment strategy for the strategic road network. From recent communications it is understood that Highways England may be prepared to consider discussions in relation to funding from the government's Road Investment Strategy (RIS) cycle. This includes £11 billion of capital funding committed between 2015 and 2020. In November 2015, the government

<sup>1</sup> https://www.gov.uk/government/publications/levelling-up-fund-additional-documents/levelling-up-fund-prioritisation-of-placesmethodology-note

outlined plans to develop the next RIS, known as 'RIS 2', covering the second road period after 2020. The RIS effectively provides long-term funding certainty to facilitate delivery, increase efficiencies and enhance capacity for the strategic road network, while supporting wider Government objectives, including growth and productivity.

- 3.21 Between now and 2023 Highways England are developing options for all RIS3 Pipeline schemes by engaging with its stakeholders and carrying out more research. This information will help the Department for Transport decide which of these schemes may be selected for delivery as part of RIS3 or future Road Investment Strategies. Not all schemes in the pipeline will progress to construction.
- 3.22 The agreed Statement of Common Ground with Highways England (June 2021) requires ongoing dialogue under the 'monitor and manage' framework concerning the requirements for future schemes of highway mitigation on the strategic road network aligned to planned growth in the Core Strategy Review. As part of this dialogue the Council and Highways England could actively explore opportunities for a programme of works to the M20 corridor, and Junction 12 to Junction 13 specifically, to be taken forward under RIS4. It is expected that work on the RIS4 programme will commence in 2025.
- 3.23 In March 2021 the Government announced that the UK's first ever national infrastructure bank was to launch in spring 2021, offering loans to councils as well as the private sector.
- 3.24 The bank will eventually support at least £40bn of investment for local infrastructure projects, with £4bn allocated to local authority lending in its initial stage. It will have an initial capitalisation of £12bn, of which £4bn will be allocated to council lending. This will enable councils to borrow to fund infrastructure projects including roads and other transport facilities, schools and housing.
- 3.25 The bank will partner with the private sector and local government to boost infrastructure investment. Councils will be able to borrow from the bank to build

new roads. The bank's focus will be on delivering projects that otherwise would not be possible, and bringing forwards projects to meet net zero or local growth objectives.

- 3.26 In all, the bank is expected to support at least £40bn of total investment in infrastructure. From summer 2021, the bank will offer loans to councils at a rate of gilts + 60 bps for 'high value and strategic' projects of at least £5m. This is the same rate as previously offered under the Local Infrastructure Rate from the Public Works Loans Board. The district council would have to undertake necessary due diligence to understand if funding through the National Bank is a credible option.
- 3.27 Homes England have confirmed in their response to the examination (dated 18th June 2021) that they are committed to continuing to work alongside Folkestone & Hythe District Council, Highways England, Otterpool Park LLP and other parties in order to identify the delivery mechanisms and explore funding sources necessary to enable the delivery of the Core Strategy Review and the New Garden Settlement.

# 4. Effect on Timescale and Phasing of the New Garden Settlement

#### **Planning Application update**

- 4.1. Since the examination hearing sessions in January 2021, the following progress has been made by the promoters regarding the outline planning application and detailed design work for the proposed garden settlement:
  - Further engagement has been undertaken with statutory consultees and the wider community;
  - Two virtual consultation events were held by the applicant to share more developed plans for phase one of the garden settlement<sup>2</sup>;
  - An enlarged phase one which will bring forward approximately 2,000 homes and allow for greater flexibility/diversification in the delivery of housing types and tenures;
  - Significant progress in detailed master-planning, including a draft Design Code for Phase 1 and masterplan that will provide the framework for Reserved Matters Applications (Tier 3), has been undertaken; and
  - Advanced discussions with a range of potential development partners and housebuilders, ranging from small- and medium-sized builders to national volume housebuilders and Housing Associations has been undertaken.
- 4.2. It is understood that the progress in these matters will potentially allow for more detailed information relating to Phase 1 to be submitted for approval as part of the outline planning application, giving rise to benefits in terms of an accelerated planning process as it will allow the local planning authority to consider these details for Phase 1 alongside the outline planning application.

<sup>&</sup>lt;sup>2</sup> <u>https://phaseone.otterpoolpark.org/</u>

- 4.3. This front-loaded approach, while requiring more detailed design work than might normally be the case, is intended to deliver significant delivery and timescale advantages further down the line. It also means a more deliverable approach in which design and delivery issues are addressed in-step. The control of land and involvement of the master-developer enables plot developers to be involved at a much earlier stage in the design and masterplanning process, reducing the potential for delays downstream.
- 4.4. The council remains confident that housing delivery at the garden settlement will meet the expectations of the housing trajectory discussed as part of Matter 8 hearings.

#### **Highway Mitigation and Phasing and Delivery**

- 4.5. The National Planning Policy Framework (paragraph 67) states that when identifying land for homes planning policies should identify a supply of:
  - a) specific, deliverable sites for years one to five of the plan period; and
  - b) specific developable sites or broad locations for growth, for years 6-10 and, <u>where possible</u>, for years 11-15 of the plan.
- 4.6. The Planning Practice Guidance for Housing Supply and Delivery<sup>3</sup> reiterates this positon but adds that, if longer-term sites are to be included, for example as part of a stepped requirement, then plan-makers will need to demonstrate that there is a reasonable prospect that they are likely to come forward within the timescale envisaged. Furthermore, it encourages a pragmatic approach when demonstrating the intended phasing of sites (i.e. for sites which are considered developable within 6-10 years, the authority may need to provide a greater degree of certainty than those in years 11-15 or beyond<sup>4</sup>).
- 4.7. Highways England's proposed suite of mitigation measures for M20 Junctions11, 12 and 13; and the A20 and A260 are not considered to raise viability

<sup>3</sup> Paragraph: 019 Reference ID: 68-019-20190722

<sup>4</sup> Paragraph 020 Reference ID: 68-020-20190722

concerns in regards to the delivery of the garden settlement (see Section 5). Therefore, implementation of these measures will not affect the timing and/or phasing of the garden settlement as presented at the Matter 8 hearings.

- 4.8. As outlined in Section 3, through the preparation of the Statement of Common Ground, Highways England have identified the potential for additional mitigation work between M20 Junction 12 to Junction 13 in the form of a 'type-B merge coast-bound from Junction 13'.
- 4.9. Highways England's position is that the Core Strategy Review development traffic alongside the constrained motorway network at this location will result in the need for mitigation. The modelling shows that only a relatively small proportion of the additional traffic on this part of the strategic network will be generated by the garden settlement.
- 4.10. For the Core Strategy Review examination the triggering of mitigation to M20 Junction 12 to Junction 13 raises the potential of additional infrastructure costs which cannot be attributed solely to the new garden settlement, as the need for the intervention is also the product of traffic growth arising general background traffic growth.
- 4.11. As such, it is justifiable to attribute a proportionate contribution to of the costs of the mitigation of M20 Junction 12 to Junction 13 to the new garden settlement and that this can be paid for through the development without affecting its viability.
- 4.12. Transport modelling by consultants Arcadis, in support of the garden settlement proposals, predicts that the M20 Junction 12 to Junction 13 mitigation will not be triggered until no earlier than 2031. Arcadis' work on behalf of the Council indicates that an alternative and cheaper scheme to Highways England's preferred type B merge coast-bound solution will also be feasible and effective in dealing with local plan growth and background growth. Given the timescales involved, the Council is of the view that the monitor and manage approach will afford ample time over which to review the requirement

for mitigation and the eventual form it should take, taking into account the requirements of Highways England at that time.

4.13. Using the current housing trajectory for the garden settlement, set out in Table1 below, the trigger point of no earlier than 2031 would allow the delivery of more than 2,900 homes.

Table 1								
Plan Year	Monitoring Year	Cumulative Garden Settlement Completions	Cumulative Core Strategy Review Housing Completions	Cumulative Stepped Trajectory	Cumulative Annualised Trajectory			
1	2019/20	-	440	590	738			
2	2020/21	-	916	1,180	1,476			
3	2021/22	-	1,487	1,770	2,214			
4	2022/23	-	2,210	2,360	2,952			
5	2023/24	121	3,215	2,950	3,690			
6	2024/25	385	4,256	3,870	4,428			
7	2025/26	716	5,154	4,790	5,166			
8	2026/27	1,066	6,109	5,710	5,904			
9	2027/28	1,489	7,062	6,630	6,642			
10	2028/29	1,912	7,876	7,550	7,380			
11	2029/30	2,440	8,684	8,280	8,118			
12	2030/31	2,968	9,442	9,010	8,856			
13	2031/32	3,525	10,194	9,740	9,594			
14	2032/33	4,023	10.887	10,470	10,332			
15	2033/34	4,525	11,577	11,200	11,070			
16	2034/35	5,059	12,286	11,895	11,808			
17	2035/36	5,593	12,995	12,590	12,546			
18	2036/37	6,097	13,670	13,285	13,284			

- 4.14. The table also confirms that should the completions at the garden settlement be achieved as anticipated there would be no under-delivery at this stage of the plan period as the 'stepped trajectory' would have effectively played out with the expected under-delivery in years to 1-5 having been addressed by an greater delivery in years 6-10. The table shows a potential excess of between 400 - 500 homes by this stage of the plan period dependant on whether an annualised or stepped housing requirement is adopted.
- 4.15. The council therefore considers that it can continue to demonstrate specific and deliverable sites for growth for years 1-5 and 6-10 of the plan period as required by the National Planning Policy Framework and Planning Practice Guidance – and beyond. In Years 11-15, in line with the Planning Practice Guidance, a more 'pragmatic approach' may be necessary when demonstrating the deliverability of the garden settlement.
- 4.16. The new garden settlement is planned with demand-management measures in place to ensure that it will be a sustainable town, planned according to garden town principles.
- 4.17. Under the 'monitor and manage' approach as proposed through main modifications set out in Section 6 of this statement, the need for mitigation at M20 Junction 12 to Junction 13 may never be triggered. If, under the current scenario, the M20 improvements are still required, despite the 'monitor and manage' approach, the junction upgrades would need to be delivered no earlier than 2031.
- 4.18. In, conclusion, the Highways England works are not required within phase 1; as such there is no impediment to Phase 1 proceeding; and wider works to the strategic road network would be managed through a 'monitor and manage' approach.

#### 5. Effects on Viability and Deliverability

- 5.1 An updated viability assessment from Gerald Eve is included as Appendix 1: Addendum Report on Viability for Otterpool Park New Garden Settlement to this statement.
- 5.2 This report is an addendum to the report previously prepared by Gerald Eve on the new garden settlement (July 2020 and October 2020).
- 5.3 Gerald Eve concludes that the proposed scheme at Otterpool Park, with additional infrastructure cost items, appears to remain potentially viable and deliverable.

#### 6. Suggested Main Modifications to Address Matters

#### Introduction

6.1 Discussions with Highways England, outlined in Section 2, have resulting in two proposed modifications to policies in the Core Strategy Review. (See section 6 of the Statement of Common Ground for further detail).

#### **Managing Travel Demand**

- 6.2 The first proposed main modification relates to managing travel demand. While Highways England consider that Policy SS5 meets their requirements, they have suggested an additional objective to manage travel demand in new developments.
- 6.3 It was previously put forward in the Statement of Common Ground with Highways England dated January 2020 (see document EB 13.90, paragraph 2.8) that Policy SS5 should be amended by the addition of another objective after criterion 'c' to state:

"To consider and manage the travel demand of new development proposals, and develop tailored solutions to limit car use generated by new developments."

6.4 The Statement of Common Ground with Highways England, dated June 2021, reaffirms this position (document EX083, paragraph 6.1).

#### **Monitoring Strategy**

- 6.5 The second proposed main modification relates to a monitoring strategy.
- 6.6 While Highways England agree that the Core Strategy Review is necessarily 'high-level' and broad in scope, and they note the identified infrastructure upgrades in Figure 4.4 (to include three 'key highway improvements' on the M20, A20 and A259), they suggest that that 'critical' and 'necessary'

infrastructure needed to support the spatial strategy should be set out in the Infrastructure Delivery Plan (IDP).

- 6.7 Highways England has indicated that they need sufficient certainty that the mitigation set out in the IDP is the *'right thing in the right place at the right time'* and is deliverable in terms of it meeting required standards, the land being available and it being funded.
- 6.8 It was previously proposed as part of the Statement of Common Ground with Ashford Borough Council (document EB 13.20, paragraph 2.14, February 2020) that an additional clause should be added to Policy SS7 or SS9 to state:

"A monitoring strategy shall be required to be submitted and agreed by the local planning authority in consultation with the local highways authority and other relevant local authorities in relation to traffic movement and impact on the surrounding road network."

6.9 It is proposed through the Statement of Common Ground with Highways England (EX083, June 2021) that specific reference is made to Highways England as follows:

"A monitoring strategy shall be required to be submitted and agreed by the local planning authority in consultation with the Highways England and other relevant local authorities in relation to traffic movement and impact on the surrounding Strategic Road Network."

- 6.10 While the Statement of Common Ground (EX083, paragraph 6.6) refers to this additional text being inserted into Policy SS5, it is suggested that it may be more appropriately located within Policy SS7 or Policy SS9 for the new garden settlement, as proposed through the Statement of Common Ground with Ashford Borough Council.
- 6.11 The IDP will be updated by the end 2021 (to inform the update of the Infrastructure Funding Statement which must be published by 31 December 2021). The IDP will include expanded information relating to the proposed schemes of mitigation set out above in the Statement of Common Ground. All

entries will include a clause to cross-reference the 'monitor and manage' approach.

- 6.12 As a result of both the general and specific junction engagement, both the council and Highways England agree that a Monitor and Manage Framework should be created to form a part of the suite of Core Strategy Review, IDP and other documents. Work on this Framework continues. Highways England are content that the principle of the Monitor and Manage Framework should be agreed as part of the Core Strategy Review, while the detail should be a 'living' document to be prepared as soon as possible and then regularly reviewed and updated during the life of the Core Strategy Review. Folkestone & Hythe District Council has made a commitment to this way of working (EX083), with the first Monitor and Manage Framework to be drafted and circulated to the relevant parties no later than the end of August 2021.
- 6.13 Therefore, additional supporting text is proposed to be inserted into the Core Strategy Review to state this. While the Statement of Common Ground with Highways England (EX083, paragraph 6.9, June 2021) references supporting text to Policy SS5, it is suggested that this text may be more appropriately located within the supporting text to the new garden settlement policies, as proposed in the Statement of Common Ground with Ashford Borough Council (EB 13.20, paragraph 2.13, February 2020).
- 6.14 As agreed with Highways England, it is proposed that this additional supporting text should state:

"A monitoring strategy is to be prepared by the applicant for submission to (and consideration by) the local planning authority in consultation with Highways England, to ensure there is an appropriate safeguard in place to require that future traffic levels are monitored to record the distribution and volume of traffic generated by occupied development is as predicted by modelling work carried out to inform the positon agreed in the signed Statement of Common Ground dated December 2020. In this manner any mitigation scheme is subject to a 'monitor and manage' approach to implementation. Traffic volumes are to be

monitored throughout the Local Plan period to inform when or if the mitigation to be implemented in relation to the Strategic Road Network, and specifically M20 J11, the M20 J12 to J13 proposals and the Alkham Valley Interchange (A20/A260) is required." Appendix 1: Addendum Report on Viability for Otterpool Park New Garden Settlement, Gerald Eve, June 2021 This page is intentionally blank