EXAMINATION OF THE MEDWAY LOCAL PLAN 2041

PHASE 2 HEARINGS –
MATTER 9: TRANSPORT

BOXLEY PARISH COUNCIL

OCTOBER 2026

Overview

1. These written submissions are made on behalf of Boxley Parish Council ("BPC"). They address the Inspectors' questions under Matter 9 that relate to the proposed allocations that BPC is concerned about, namely LW4 (Shawstead Farm) and LW8 (Mill Fields) within Policy SA7 (Capstone Valley). These submissions are also relevant for Matter 10 (Infrastructure) and Matter 13 (allocations).

2. BPC's Hearing Statement for Matter 9 consists of (1) these submissions and (2) the submissions below of transport planning consultant John Russell.[1]

Questions 9.1 and 9.5: transport evidence and contingency measures

Summary answer

3. There is insufficient evidence regarding the funding or delivery of the M2 Junction 4 improvement for the Plan itself to be deemed deliverable and therefore sound. The necessary mitigation is neither costed nor funded, and it is not tied to the phasing of LW4 and LW8. The Council's contingency measures if Lidsing does not deliver, i.e. an interim scheme, remain untested and uncertain.

Boxley and Bredhurst

4. The Maidstone Inspector found that the East-West Link Road through Lidsing would have "an appreciable effect in re-distributing traffic away from Boxley to the enhanced access at M2 Junction 4."[2] He recognised, however, that the route via Boxley is the most direct link to the northern edge of Maidstone, and shared the concern of BPC and others

[1] BPC has submitted a separate Hearing Statement for Matter 13, but Policy SA7 has significant implications for the plan's transport strategy as a whole, hence these submissions on Matter 9.

[2] Maidstone Local Plan Review Inspector's Report (MLP/ED23A), para 169.

about the need for mitigation.[3] Development at LW4 and LW8 would add to those flows. If the link is not in place, there is nothing in the evidence to redistribute that traffic.

If the Lidsing scheme does not come forward

5. National Highways and Kent County Council have raised the risk that Lidsing does not start, or stalls, before the Junction 4 improvements are delivered. It is recorded in the SoCG between National Highways and Medway Council that the Council "will need to demonstrate how future development in the Capstone Valley could come forward" if Lidsing and the fourth arm do not.[4]

6. The Council has failed to demonstrate how future development in the Capstone Valley could come forward in this scenario.

7. The Council's response has two elements:

   a) an "interim scheme" of slip-road and lane changes at Junction 4;[5] and

   b) a "Monitor and Manage Mitigation Strategy", which it "intends to commission".[6]

8. National Highways has requested further information, including highway modelling.[7] The matter remains "under discussion."[8]

The interim scheme

9. The interim scheme does not provide a sound fallback if the Lidsing Garden Community or its infrastructure does not come forward. It was devised late. It has not been tested in the strategic traffic model. Only part of it has been costed. National Highways has not yet agreed it. The Council's own consultants make numerous qualifications to their conclusions about it.

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[3] Ibid.

[4] MLP/ED20, paras 2.5.3–2.5.4.

[5] Junction Modelling and Mitigation Report (B18.7), para 13.3.

[6] MLP/ED20, para 2.5.6.

[7] NH accepts in principle that the mitigation is acceptable from a technical perspective, but has not tested the costings, the design or the modelling.

[8] MLP/ED20, para 2.5.5.

10. The interim layout was identified in Autumn 2025. Jacobs says it was "assessed since the submission of the Regulation 19 evidence base."[9] So far it has only been tested in isolated junction modelling.[10]

11. This matters for Bredhurst and Boxley. Only the strategic model shows how drivers would re-route if the junction were not improved, and that re-routing is what drives rat-running through the villages. Without an adequate East-West Link Road, traffic from Lidsing and the Capstone Valley would load onto Hempstead Road, Chapel Lane, Hempstead Valley Drive and Sharsted Way, and would rat-run through Bredhurst and Boxley.

12. The interim scheme was tested against "2041 DS flows."[11] The final strategic model includes the Lidsing promoter's full junction design.[12] The evidence does not make clear whether the flows used to test the interim scheme were generated on a network that already assumes the fourth arm and the link road. If they were, the assessment is fundamentally flawed. The Council should be asked to clarify this.

13. The costings for the interim scheme also show high variability (–20% to +30%[13]) and the feasibility of the design proposed is "subject to further work to be conducted at the detailed design stage."[14]

14. Finally, the interim scheme does not address the problem of cumulative traffic. The Maidstone Inspector considered both a "do nothing" option and a free-flow three-arm junction at Junction 4. He found that "neither of these options are reasonable given constraints elsewhere in the local road network within Medway".[15] The interim scheme is, in substance, an improved three-arm junction. The Council has not explained why the Inspector's concern about the Medway network does not apply equally to it.

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[9] Junction Modelling and Mitigation Report (B18.7), para 13.3.

[10] B18.6, section 3.1.

[11] Ibid.

[12] Forecasting Report (B18.1), section 8.3.

[13] B18.9 Strategic Transport Assessment - M2 Junction 4 Cost Estimate Report, 5.5 (p 10).

[14] B18.9, Appendix A, Register of Design Information, notes 2 and 7.

[15] Maidstone Local Plan Review Inspector's Report (MLP/ED23A), para 162.

15. Paragraph 116 of the NPPF requires residual cumulative impacts to be judged "taking into account all reasonable future scenarios".[16] The scenario in which Lidsing stalls is the scenario the interim scheme needs to address. However, there has been a failure to adequately model cumulative traffic impacts.

Monitor and manage

16. A strategy that has not yet been commissioned cannot 'ensure', for the purposes of NPPF paragraph 115, that significant impacts can be mitigated. It proceeds on the basis that the impacts will be identified and addressed later. By then, rat-running through Bredhurst and Boxley may already be established, and travel habits of that kind are difficult to reverse once alternative routes are provided. If sufficient evidence on highways impacts and mitigation is not produced at the examination stage, the allocation cannot be considered sound.

Uncertainty in the Council's own evidence

17. Jacobs' own reports repeatedly distance themselves from the evidence on which the Plan relies:

    a) on the full scheme: "It is important to reiterate that the design and model outputs originate from a third party: Charles and Associates, the developers".[17]

    b) on design status: "the design drawings of the proposed junction are not finalised and as such revision may be required as the Local Plan is adopted".[18]

    c) on the interim scheme's exclusion from the strategic models: "the interim layout at M2J4 [has] not been included in the forecast VISUM models (rRC, iDS or fDS)."[19]

    d) on the interim scheme's feasibility: "subject to further work to be conducted at the detailed design stage."[20]

[16] NPPF (December 2024), para 116.

[17] B18.7, section 13.2; B18.1, section 8.3; M2 Junction Analysis Technical Note (B18.5), section 3.4.

[18] B18.5, section 3.4.

[19] B18.6, section 3.1.

[20] B18.9, Appendix A, note 7.

18. These are not the statements of a consultant confident that a tested fallback exists. Taken together, they confirm that the Council cannot yet "ensure", for the purposes of paragraph 115 of the NPPF, that the impacts of LW4 and LW8 can be cost-effectively mitigated to an acceptable degree if Lidsing does not deliver the required infrastructure.[21]

19. Overall, LW4 and LW8 should be removed from the Plan.

20. Mr Russell's submissions below address further issues under Matter 9.

ALEX SHATTOCK

Landmark Chambers

26.10.26

[21] NPPF (December 2024), para 115(d).

1.1 These submissions have been prepared on behalf of **Boxley Parish Council** for the Examination of the Medway Local Plan 2041.

1.2 They address the questions raised under **Matter 9 in relation to Transport.**

1.3 As the Inspector will be aware, Boxley Parish Council has particular concerns about Policy SA7 (Capstone Valley) (see submissions under Matter 13), but these concerns have implications for Matter 10 (Infrastructure) and also Matter 9 (Transport).

1.4 These submissions address the Questions for Matter 9 specifically.

1.5 These submissions are prepared by Mr John Russell, who is a Chartered Transport Planner, being a Chartered Member of the Institute of Logistics and Transport (CMILT) and a Member of the Chartered Institution of Highways and Transportation (MCIHT). Mr Russell holds an Honours Degree in Civil Engineering and is a Director of JR Transport Planning Limited, a consultancy that specialises in transport planning, traffic engineering and highway design.

9.1: What evidence demonstrates that the transport strategy can facilitate and accommodate the scale and distribution of development across Medway proposed by the Plan?

9.3: Have all strategic highway, public transport, active travel and rail infrastructure requirements been identified?

9.4: What are the principal transport constraints to growth and how will they be addressed?

1.6 The delivery of the fourth arm of M2 Junction 4 forms a principal transport restraint to growth and is critical to the delivery of the plan as a whole as well as SA7. The delivery of this key infrastructure improvement is outside of the Council's control, and there is no certainty on what will happen if delivery is delayed.

1.7 The Statement of Common Ground between Medway Council and National Highways (MLP/ED20, paragraphs 2.5.3–2.5.10) provides important evidence of the outstanding issues. It raises National Highways' concerns about reliance on LGC in neighbouring Maidstone to deliver the fourth arm of M2 Junction 4, including the possibility that LGC may stall or not proceed. It also identifies the need for Medway Council to demonstrate how Capstone Valley could proceed if LGC and the associated junction scheme do not come forward. The same is true of the East-West Link Road connection proposed for the Capstone Valley development.

1.8 A comparison of the June 2025 transport assessment and the December 2025 transport assessment[1] indicates that some minor amendments, principally to lane widths, have been made

[1] B18.5

to the M2 Junction 4 improvement scheme previously tested through the Maidstone Local Plan. These changes would not be expected to deliver a material increase in junction capacity, consistent with the broadly similar modelling results presented in both assessments.

1.9 Importantly, at this stage, the Council's own position is that they do not know if these tweaks to the M2 Junction 4 improvement scheme established through the Maidstone Local Plan can be delivered stating that:

1.10 Additionally, whilst the methodology has been agreed, the design drawings of the proposed junction are not finalised and as such revision may be required as the Local Plan is adopted.[2]

1.11 Notwithstanding that the Council has not identified any deliverable changes to the M2 Junction 4 improvement scheme tested through the Maidstone local Plan, Figure 3-21[3] shows that, during the morning and evening weekday peak periods modelled, in the 2041 reference case some approaches are over capacity (they have a volume to capacity, V/C, in excess of 100%) and these continue to do so in the 2041 do something case. This means that there is more traffic at certain parts of the junction than there is space for them. This indicates that modelled traffic demand exceeds the available capacity, with the potential for queuing and delays

1.12 Despite this, Figure 3-22[4] provides a comparison of reference case queuing versus do something queueing concluding that because there is no change, that this indicates that tweaks to the M2 Junction 4 improvement scheme established through the Maidstone Local Plan, which the Council themselves cannot confirm can be delivered, are sufficient to wholly mitigate traffic arising from almost 4,000 new homes at a junction, which is already exceeding its capacity in the baseline case.

1.13 However, this conclusion requires careful scrutiny. The apparent absence of additional queueing is insufficient, in isolation, to demonstrate that the proposed development's transport impacts have been adequately mitigated.

1.14 In effect, the assessment appears to infer that the absence of a material change in modelled queueing demonstrates that the proposed mitigation is sufficient to accommodate the traffic associated with almost 4,000 additional homes. That inference is not adequately supported by the evidence presented, particularly given the existing capacity constraints and the absence of confirmation that the assumed junction improvements can be delivered.

1.15 The underlying modelling assumptions are central to this concern. Where traffic demand exceeds the available capacity of a junction approach, the modelled assignment of traffic may be influenced by the capacity constraints imposed. Additional demand may be redistributed to alternative routes, assigned to different journey patterns or, depending on the model's operation and convergence procedures, remain unassigned or otherwise not be represented as additional traffic passing through the constrained junction during the modelled period.

1.16 Consequently, a modelled absence of additional queueing does not necessarily demonstrate that the network has sufficient capacity to accommodate the proposed development. It may instead reflect the way in which excess demand is represented within the model. Unless the assessment

[2] B18.5 page 21
[3] B18.5
[4] B18.5

clearly explains and quantifies how demand exceeding capacity has been treated and demonstrates that the resulting traffic assignment provides a robust representation of likely real-world conditions, it is not possible to conclude confidently that the development's transport impacts have been satisfactorily addressed.

1.17 A review of the junction capacity assessment results also indicates changes in traffic patterns between the reference and Do-Something scenarios. Such changes may reflect the reassignment of traffic in response to congestion and capacity constraints elsewhere on the network. However, the assessment does not adequately establish the extent to which additional demand is being redistributed to alternative routes, remains unassigned, or is effectively represented through changes in journey timing.

1.18 This is a material omission. If traffic is being displaced from M2 Junction 4 onto other parts of the highway network, the resulting effects may include additional congestion, delays and environmental impacts elsewhere. If demand is not being fully represented, the assessment may understate the transport consequences of the proposed development. Either outcome would undermine reliance upon the modelled junction results as evidence that the development can be accommodated without unacceptable impacts.

1.19 The Council has failed to demonstrate how demand exceeding junction capacity has been treated in the modelling, where any reassigned or displaced traffic is forecast to travel, whether the consequences of unmet demand have been adequately assessed, or whether the results remain robust given the uncertainty surrounding the deliverability of the proposed junction improvements.

1.20 The Statement of Common Ground also identifies a potential mismatch between the timing of development and the provision of highway capacity. At paragraph 2.5.8, it records that work undertaken on behalf of the Capstone Valley promoter indicated that the existing M2 Junction 4 could accommodate up to 600 additional vehicle movements before the new scheme was required. However, a combined housing trajectory indicated that the junction scheme would be required early in the Plan period. Paragraph 2.5.10 further records that delivery of the improvements remained under discussion. These findings require a clear explanation of how the existing junction and surrounding highway network will accommodate the anticipated development trajectory before the improvements are delivered, including the cumulative effects of Capstone Valley and LGC and the interim mitigation that would be necessary.

1.21 The Council's Infrastructure Delivery Plan (IDP) identifies the M2 Junction 4 improvement as a "critical" infrastructure requirement, with funding and delivery assigned to LGC. However, the IDP records the estimated cost as "TBC" and funding identified as £0 against the relevant schedule entry. No separate costed package of highway mitigation specifically attributable to SA7 has been identified. These entries do not establish that no funding or commitments exist elsewhere, but they do mean that the IDP schedule itself does not demonstrate how the necessary infrastructure has been fully costed, funded and secured for Capstone Valley.

1.22 This dependency is particularly concerning because LGC is in a neighbouring local planning authority area and its delivery is not within Medway Council's direct control. The LGC Supplementary Planning Document also appears to place the relevant junction spur within Phase 2, to be delivered by 2038, with delivery subject to a vision-and-validation and monitor-and-

manage approach. The critical reliance placed on them for the delivery of SA7 therefore needs to be reconciled with their apparently later and conditional delivery by 3rd parties.

9.5: What contingency measures exist to deliver the required development growth if key transport schemes are delayed or not delivered?

1.23 The proposed funding and delivery arrangements for the M2 Junction 4 improvements do not, in themselves, establish that the infrastructure required by SA7 is secured. Although the IDP identifies LGC as the source of funding and delivery, the absence of a cost estimate and of funding recorded against the relevant schedule entry leaves the financial position unclear. The Statement of Common Ground's[5] confirmation that delivery remained under discussion adds to the need for clarity about the delivery programme, the parties' respective responsibilities and the arrangements by which the works will be secured.

1.24 Furthermore, if the need for the junction works is subject to monitoring and validation of LGC's transport impacts, their construction may be deferred or may not be triggered if the relevant thresholds are not reached. If the works are not required to mitigate LGC's own impacts, it is unclear what mechanism would nevertheless secure their delivery if the trigger for the requirement is the additional traffic generated by SA7. It should therefore be demonstrated what alternative arrangements would apply if LGC stalls, the relevant triggers are not reached, or the junction works are delayed.

1.25 Equivalent clarity is required for the East-West Link Road and the sustainable transport measures. The evidence should identify the costs attributable to SA7, the funding sources and delivery responsibilities, the necessary land and approvals, and the point in the development trajectory at which each element will be operational. Where delivery is dependent on another authority, another development or future funding decisions, the consequences of delay should be assessed and credible contingency arrangements identified. The necessary walking, cycling and public transport infrastructure should be available when residents need it, rather than being deferred until car-dependent travel patterns have become established.

1.26 These uncertainties have direct implications for the phasing, viability and overall deliverability of SA7. The costs of the strategic highway improvements, active-travel connections, public transport services and local facilities need to be reflected in the assessment of the allocation. It should also be demonstrated that the infrastructure can be delivered alongside the housing quantum proposed, without reliance on funding or delivery arrangements that remain uncertain. The existence of a broad strategy or a proposed improvement is not equivalent to demonstrating that the necessary works are funded, secured and deliverable when required.

1.27 In particular, the deliverability of the site-specific allocations within Policy SA7 within the anticipated housing trajectory has not been sufficiently demonstrated. The trajectory depends on strategic highway infrastructure, including the East-West Link Road and improvements to M2 Junction 4, yet the submitted evidence leaves unresolved questions over their funding, delivery arrangements and timing. Moreover, the Council's evidence identifies reliance on the neighbouring LGC for the M2

[5] ED20

Junction 4 improvement and East-West Link Road creating uncertainty over whether the necessary capacity will be available when required by Capstone Valley.