

M20 Junction 10a

TR010006

5.5 Consultation Report Appendix D

APFP Regulation 5(2)(q)

Revision A

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure)

Regulations 2009



Volume 5
July 2016

M20 Junction 10a

TR010006

5.5 Consultation Report Appendix D

Volume 5

This document is issued for the party which commissioned it and for specific purposes connected with the above-captioned project only. It should not be relied upon by any other party or used for any other purpose.

We accept no responsibility for the consequences of this document being relied upon by any other party, or being used for any other purpose, or containing any error or omission which is due to an error or omission in data supplied to us by other parties

This document contains confidential information and proprietary intellectual property. It should not be shown to other parties without consent from us and from the party which commissioned it.

Content

Chapter	Title	Page
	Appendix D.	1
D.1	Consultee responses Section 47 _____	1
D.2	Consultee responses section 42 _____	10
D.3	Consultee response section 48 _____	18

Appendix D.

D.1 Consultee responses Section 47

Appendix D.1 includes Highways England responses received during the section 47 community consultation which ran from 14 January to 17 March 2016. The content of responses has been refined into disciplines and topics. The disciplines, topics and Highways England response are organised in the table D.1. Table D.1.2 includes landowner responses to section 47 and Table D.1.3 includes those responses received from non-statutory stakeholders to section 47. See Chapter 6.5 of the Consultation Report for key issues raised.

Where relevant the table states where a change has been made. A change is defined as matters or elements related to the present schemes scope, environmental mitigation measures or a change to a future approach.

Table D1-1 Section 47 community consultation

Consultation response / Topic area		Change	Highways England summary response
SCHEME OBJECTIVES			
New route to Ashford	Disagreement with scheme objective. Agree a new route for the hospital.	N	A small number of people specifically commented on the schemes objectives. The objectives include those specific to Ashford and those related to Highways England's 2015-2020 Delivery Plan.
Ashford's development	Agree the scheme is needed for expansion.	N	
Journey time reliability	Lengthening journey eastbound from Dover/Folkestone. Extra roundabouts to negotiate.	N	
DESIGN			
Barrey Road junction	Concern raised over left hand turn difficulty.	N	A separate junction improvement scheme run by the local area team will look to address safety concerns from the consultation. Additional modelling and scheme design work carried out as part of the schemes consultation review has been shared with the team.
	Request to ban right hand turn.		
	Preference for a roundabout at Barrey Road junction in place of signals.		
A2070	Concerns over speeding and antisocial behaviour on the A2070 within the scheme area.	Y	The local area team have been advised of consultation responses. The new dual carriageway link road will have a speed limit of 40mph along with the A2070 new roundabout to junction 10 connection. The addition of the new link road roundabout will reduce overall traffic speeds.
	Questions regarding the use of quiet pavements.	Y	Highways England will specify thin surface course surfacing which will mitigate noise pollution within the scheme.

Consultation response / Topic area		Change	Highways England summary response
Non-Motorised Users	Request to look at a bridleway along the new A2070 link road.	N	There are currently no plans to incorporate a bridleway. However, Highways England is open to future discussions should they be requested by the local authority of Kent.
	Questions regarding a cycle route on the A20 connecting junctions 10 and 10a.	Y	A designated cycle route has been incorporated in the schemes scope. Highways England is committed to investigate future links onto the A20.
A20	Junction 10a bypass.	N	Highways England has carried out additional design reviews of this section of the scheme following the consultation. The reviews showed no overall benefits to include a jet lane bypass on the A20 bypassing junction 10a and are therefore not included in the application.
	Traffic capacity concerns on the A20 between junctions 10 and 10a.	N	Highways England acknowledges that local traffic will use the A20 in preference if this is perceived as being a quicker route. The traffic numbers are expected to be relatively small; the traffic model forecasts this to be in the order of 5 to 10 vehicles an hour. Please refer to Chapter 6, para 6.5.36 of the Consultation Report for further details.
Stour Park	Questions regarding the type of access into the proposed development.	N	Highways England published on 5 May 2016 an updated Scheme Information brochure which included details of a potential access into the Stour park development. A roundabout has been designed as an alternative.
Junction 10	Concerns over the junction 10 signals.	Y	Concerns passed to local Area 4 team for investigation. . A statement by Highways England was released on 11 April 2016 advising of a solution to the issue.
	Eastbound off-slip road, the community questioned the requirement to close the existing slip road.	N	The existing slip roads to the south eastern face of junction 10 cannot remain due to technical design reasons. A full explanation is provided in the consultation report see chapter 6, para 6.5.42.
Pumping station	Questions regarding the relocation of the pumping station.	N	The precise location will be a matter for discussion with Southern Water after the DCO is granted, but the Southern Water pumping station is likely to be relocated off the top of the west side of Highfield Lane below the existing layby.
Sweatman Mowers	Questions raised asked if Sweatman Mowers location was required for the scheme.	N	The attenuation pond and associated maintenance access encroach into the boundary of Sweatman Mowers. The drainage system outfall into the Aylesford Stream from the pond extends through the existing building. The area will also be incorporated into the environmental mitigation strategy for the scheme.
Kingsford Street footbridge	Request to look at location of exit onto Kingsford Street and extent of noise barrier.	Y	A design review has realigned the access point to a more southerly point extending the noise barrier. See paragraph chapter 6, para 6.5.36 of the Consultation Report for more details.

Consultation response / Topic area		Change	Highways England summary response
and noise barrier	Request to look at the requirement to light the bridge.	N	The proposed lighting design for Kingsford Street footbridge complies with a 2015 Road Safety Audit. A modern lighting design has been incorporated (see the Consultation Report chapter 6, para 6.5.36 for more details).
Incorporation of new roundabouts	Responders raised concerns over the use of roundabouts in the scheme design. Specifically the requirement to use two additional roundabouts to access the M20 in certain route options.	N	During the scheme development traffic signal controlled junctions were initially developed in these two locations. However during the traffic modelling for the Scheme, testing identified that roundabouts would improve the flow of traffic around the network in comparison to traffic signal controlled junctions.
Kingsford Street and Highfield Lane access	Request to close Highfield lane leading to Kingsford Street.	N	The request is outside of the schemes scope.
ENVIRONMENT			
St Marys Church	Concern raised over the impact of construction on the churches structures.	N	Highways England does not envisage any adverse effect on the church. Permanent mitigation measures are in been incorporated into the environmental masterplan. See the ES chapter 11 Noise and Vibration.
A20 noise barrier	Residents in the vicinity of the proposed junction 10a enquired if an acoustic barrier would be provided and if planting will be in place to buffer the noise and pollution.	Y	Following an update to the noise model to incorporate traffic flows on the A20 additional measures have been incorporated into the environmental design. See the consultation report (see chapter 6, para 6.5.34 for more details).
TRAFFIC MODELLING			
Barrey Road junction capacity	Concern of the impact of new units.	N	A separate junction improvement scheme run by the local area team will look to address all concerns from the consultation. Additional modelling work carried out as part of the schemes consultation review has been shared.
	Preference for a signal controlled junction.		
St Marys Church	Concern the church structure maybe affected by an increase in HGV usage on the A2070.	N	HGV flows are forecast to increase by a small amount on the A2070 around St Marys Church. These differences will not have a significant impact to the St Marys Church structure.
Kingsford Street	Rat-running concerns.	N	Use of this route as a rat run is forecast to change. See the Consultation Report (chapter 6, para 6.5.36) for further explanation.
William Harvey Hospital	Access concerns and journey time reliability.	N	Journey time reliability to The William Harvey Hospital will generally be improved as less congestion is forecast to occur at junction 10 in the future with the addition of junction 10a. See the Consultation Report (chapter 6, para 6.5.23) for further explanation

Table D1-2 Section 47 landowner's response

Consultation response / Topic area		Consultee(s)	Change	Highways England summary response
DESIGN				
Design proposals	Impact on Sothern water proposals.	Sothern Water	N	Highways England is committed to on-going engagement with Southern Water. Southern Water also responded as a section 42 consultee further comment is provided in Appendix D.2
Kingsford Street footbridge	Impact of footbridge location on consultees business.	Mr Ramsey and Mr & Mrs R Thornby	Y	Footbridge ramp extended and realigned. See Chapter 6, para 6.5.36 in the Consultation Report for further details.
Sewage pumping station location	Relation of station question.	Michael-John Knatchbull	N	The precise location will be a matter for discussion with Southern Water after the DCO is granted, but the Southern Water pumping station is likely to be relocated off the top of the west side of Highfield Lane below the existing layby. The response is also detailed in table D.1.1.
Traffic Modelling				
A20	Traffic flow.	Mr Sweatman and Mr & Mrs R Thornby	N	Traffic flows are expected to change on the A20 due to the new A2070 link Road see the consultation Report (chapter 6, para 6.5.36) for further details.
Kingsford Street	Rat running.	Michael-John Knatchbull	N	Use of this route as a rat run is forecast to change. See the Consultation Report (chapter 6, para 6.5.36) for further explanation. The response is also detailed in table D.1.1.
Traffic	U19 development on traffic flows.	Michael-John Knatchbull	N	Highways England takes into consideration all relevant development traffic flows.

Table D 1-3 Section 47 non-statutory stakeholder responses

Consultation response / Topic area		Consultee(s)	Change	Highways England Summary response
DESIGN				
Barrey Road	Accessing the A2070 from Barrey Road.	CPRE Kent / North Willesborough Community Forum	N	Please refer to the Barrey Road response in the table D.2.1.
Junction 10	Concern raised regarding the closure of the eastbound slip roads.	East Kent Hospitals University NHS	N	Design regulations require the slip roads to be closed. Journey time reliability to The William Harvey Hospital will generally be improved

Consultation response / Topic area		Consultee(s)	Change	Highways England Summary response
				as less congestion is forecast to occur at junction 10 in the future with the addition junction 10a.
Land restriction	Observation to remove the free-flow lane on the proposed A2070 roundabout heading towards junction 10.	CPRE Kent	N	Highways England is happy with the design of the free-flow lane which has been through a Road Safety Audit and is operationally required within the scheme design.
Church Road junction	Request to include the junction in the scheme.	North Willesborough Community Forum	N	The Church Road junction is not within the scope of the scheme.
A2070 roundabout	Comment if there should be a roundabout.	North Willesborough Community Forum	N	The provision of the roundabout facilitates free flowing traffic.
Bridleway	Provision of a bridleway in the scheme.	British Horse Society	N	There are currently no plans to incorporate a bridleway. However Highways England is open to future discussions should they be requested by the local authority of Kent.
A20	Junction 10a bypass.	North Willesborough Community Forum	N	Please refer to the A20, junction 10a bypass response in the table D.1.1.
A20	Review the design for the A20 and junction 10 east facing slip road.	North Willesborough Community Forum	N	Highways England has progressed the scheme from the original preferred route announcement and consulted widely on its proposals.
Design measures	<p>Assurances the design meets the requirements for motorcycles.</p> <ol style="list-style-type: none"> 1. Needs of Motorcyclists been specifically considered 2. Barriers, must not have any protrusions 3. Cross winds 4. Road signs 5. Junction length and alignment 6. Cats eyes 	Motorcycle Group	N	<p>The scheme has been designed to all relevant guidelines. Highways England can confirm all requirements have been met for motorcycle users. The following are responses to specific concerns:</p> <ol style="list-style-type: none"> 1. The proposed highway alignment has been designed in accordance with the Design Manual for Roads and Bridges (DMRB) standards which take into consideration all users of the highway including motorcyclists. 2. A Road Restraint Risk Assessment Process (RRRAP) analyse has been undertaken and the results applied using TD19/06. Where this process determines that a vehicle restraint system is required the appropriate barrier will be specified in accordance with current guidelines and best practice. No wire rope barriers will be used on this scheme 3. The scheme includes an appropriate planting strategy including environmental bunds which will help to reduce the occurrences of cross winds in the more exposed sections of the scheme.

Consultation response / Topic area		Consultee(s)	Change	Highways England Summary response
				<p>4. Road signs are designed in accordance with the Traffic Signs Manual DMRB and other relevant standards and guidance notes. The sign locations are reviewed as part of the safety audit process considering the risks to all users of the highway.</p> <p>5. Due to the location of the proposed Junction 10A the existing east facing slips of Junction 10 are to be closed to ensure there is sufficient distance between successive merges or diverges in accordance with the DMRB.</p> <p>6. The type of cats eyes used for the scheme will be dictated by the specification in accordance with the Specification for Highway Works and assessed through the safety audit process. Highways England will make a record of the groups observation.</p>
ENVIRONMENT				
Environment enhancement	Mitigation proposal to protect the wildlife and enhance the existing environment.	CPRE Kent	N	Full details of ecological mitigation measures and landscape proposals are contained within ES Chapter 8 Nature Conservation and Chapter 7 Landscape and visual impacts respectively. An Environmental Masterplan for the Main and Alternative Schemes have also been produced.
Environmental information	Concern about worsening environmental impacts.	Wye with Hinxhill Parish Council	N	An Environmental Impact Assessment has been produce which considers the effects of the Scheme on the Environment.
PEIR	Request for ANOB policies be complied with.	Kent Downs Area of Outstanding Natural (ANOB)		Highways England is cognisant of the ANOB policies. The Landscape Visual Impact Assessment chapter of the ES makes reference to the AONB of the ES. Also see the Consultation Report chapter 6, para 6.5.88 for further response.
TRAFFIC MODELLING				
Modelling on minor road	Consideration of Bockham Lane and Hinxhill Road.	Wye with Hinxhill Parish Council	N	Traffic modelling occurs within the schemes scope. Consideration of local impact issues have been widely discussed with KCC and ABC within the M20 junction 10a steering group.
Traffic modelling data	Availability of data.	Wye with Hinxhill Parish Council	N	Highways England is happy to liaise with all parish councils on the traffic data. A model of the traffic was available during the section 47, 42 and 48 consultations.
Wider local road effects	Request for further traffic modelling to take place.	Wye with Hinxhill Parish Council	N	Highways England has undertaken extensive traffic modelling to inform the scheme design and is confident in addressing the

Consultation response / Topic area		Consultee(s)	Change	Highways England Summary response
				outcomes of the modelling work within the schemes scope and design. Highways England is happy to engage with local parish councils to discuss any additional concerns.
ROAD NETWORK				
A2070 junction improvement works	Requirements for the Finberry development to carry out improvement works on the A2070. Request to work in collaboration on time scales.	WSP Parsons Brinckerhoff on behalf of Crest Nicolson	N	Highways England will include the representatives of WSP Parsons Brinckerhoff in all communication relating to development of the scheme and will set up an initial scheme overview meeting in the quarter three of this year.
Access to William Harvey Hospital	Benefits of a second entrance to the William Harvey Hospital off the A20.	East Kent Hospitals University NHS	N	Any proposal to add an additional entrance route for the hospital is a local planning matter. Highways England would be a statutory consultee.
STOUR PARK DEVELOPMENT				
Access to development	Observation that the access should be built at the same time as the link road.	North Willesborough Community Forum	N	Highways England will continue to engage with all landowners of proposed development within the scheme vicinity.

Results from the first two questions of section E of the consultation questionnaire relating to Highways England’s Diversity Guidelines. Results are compiled from completed answers.

Table D1-4 Results from Question E1

Age range	Responses	Total
16>29	6%	10
30>44	13%	21
45>60	25%	40
60+	56%	92
Total	100%	163

Table D1-5 Results from Question E2

Answer Choices	Responses	Total
Male	74%	136
Female	26%	47
Total	100%	183

D.2 Consultee responses section 42

Appendix D.2 includes Highways England responses received during the section 42 consultation which ran from 14 January to 17 March 2016. The content of responses has been refined into disciplines and topics. The disciplines, topics, the associated consultee(s) and Highways England response are organised in the table D.2.1. See Chapter 7.5 of the Consultation Report for key issues raised.

Where relevant the table states where a change has been made. A change is defined as matters or elements related to the present schemes scope, environmental mitigation measures or a change to a future approach.

Table D2-1 Section 42 consultees

Consultation response / Topic area		Consultee(s)	Change	Highways England Summary response
DESIGN				
Scheme drawings	Request for scaled detailed drawings, in particular junction 10a gyratory, balancing ponds and landscaping, new footbridges and public rights of way.	Kent County Council (KCC) Ashford Borough Council (ABC)	Y	Highways England provided a full set of drawing on 29 April 2016 to include the environmental masterplan.
Public Rights of Way	Request for details of permanent closure and realignment. All Public Rights of Way (PRoW) meet KCC's requirements.	Kent County Council Ashford Borough Council	Y	Highways England has amended all PRoW to concur with KCC's letter dated 5 February 2016 from the KCC PRoW team. For clarity the following PROWs have been closed within the schemes red line boundary: AE636, AE338, AE337A, AU53, Au63C, AU65 and AE339.
Barrey Road junction	Request for alteration changes to Barrey Road and a right hand signalised turn-out of Barrey Road.	Ashford Borough Council / Vectos on behalf of TH Real Estate	N	Improvement works to the Barrey Road junction outside of the schemes design features will be managed by Highways England 'Area 4' team. The team is operationally responsible for the local road network on the A2070. The right hand signalised turn request has been passed on to the team but will not form part of the schemes design.
Kingsford Street and Highfield Lane closure	Request for a closer to Highfield Lane and Kingsford Street.	Kent County Council / Ashford Borough Council	N	Highways England considers this request to be outside of the schemes scope. There is no justification from traffic modelling to justify this incorporation in the scheme. Highways England is committed to further discussion with the Local Authorities and Stour Park developers should they wish to proceed with a request.

Consultation response / Topic area		Consultee(s)	Change	Highways England Summary response
Signage	Request for M20 junction 10 signage to be downgraded to provide local route choices to include reference to A&E at William Harvey Hospital. Request for signage to be compliant with KCC requirements. Request for signage to direct HGVs away from the A20.	Kent County Council / Ashford Borough Council	Y	Highways England has amended all signage in-line with KCC signage requirements letter dated 5 th February 2016. See Signage Strategy in Appendix 7.5.
Closure of east facing slip Road on junction 10	Request for further discussion regarding the impact on the A20 Hythe Road.	Kent County Council	N	Highways England is happy to discuss all aspects of the scheme with KCC.
Sustainable drainage SPD	Consideration of the sustainable drainage SPD.	Ashford Borough Council	N	Highways England can confirm the scheme design meets the requirement of the policy.
Public sewers	Request to determine the exact position of the public sewers on site request relocation or diversion is agreed and approved by Southern Water.	Southern Water	N	Highways England commenced engagement with Southern Water in 2015 and will continue discussions.
ENVIRONMENT				
Arboricultural report	Request an Arboricultural report detailing trees and hedges.	Ashford Borough Council	N	An Arboricultural Survey Report and an Arboricultural Implications Report have been produced, both of which will be Technical Appendices to the Landscape and Visual Impact Assessment (Chapter 7 of the ES).
Kingsford Street	Concern about the overall visual impact on the rural character.	Ashford Borough Council	N	A Landscape and Visual Impact Assessment has been produced (Chapter 7 of the ES) which assesses the visual impact of the Scheme. An Environmental Masterplan has also been produced which incorporates mitigation measures including screening.
Surface water management and water environment principles	Request to be consulted on the management of surface water to include a Flood Risk Assessment and preliminary Water Framework Directive Assessment.	Ashford Borough Council	N	Highways England held an environment workshop on 9 March 2016 which was attended by ABC and advised on the ES. A Flood Risk Assessment and Water Framework Directive assessment are part of the ES (Appendix 14.2 and Appendix 14.1 respectively).
Drainage	Request to see details of the current land drainage regime.	Ashford Borough Council	N	Highways England held an environment workshop on 9 March 2016 which was attended by ABC and advised on the ES. A Drainage

Consultation response / Topic area		Consultee(s)	Change	Highways England Summary response
				Strategy has been produced for the Scheme and is provided as an Appendix to the Flood Risk Assessment (Appendix 14.2 of the ES).
Protected species	Request to demonstrate mitigation to maintain protected species.	Kent County Council / Ashford Borough Council	N	Notable species and designated sites are covered in the Ecological Impact Assessment (EclA) (Chapter 8 of the ES). We have been in discussion with Natural England about the impacts on protected species and the production of a Letter of no Impediment. An Assessment of Implications on European Sites, Habitat Regulations Assessment has also been produced.
Contamination	Proposals should show details to ensure potential sources of contamination are properly identified.	Ashford Borough Council	N	A Geology and Soils assessment (Chapter 9 of the ES) has been produced as has a 'Contaminated Land Desk Study and Preliminary Interpretive Report' (DCO document 7.4). The Contaminated Land Desk Study and Preliminary Interpretive Report includes a quantitative risk assessment and conceptual model identifying potential contamination linkages and provides recommendations for the management and mitigation of any identified contamination risks.
Pollution assessment	Request to carry out a pollution assessment.	Ashford Borough Council	N	Air quality management is covered in the Air Quality assessment (Chapter 5 of the ES) which includes mitigation measures as appropriate.
Minerals and Waste	Request for a Minerals Assessment.	Kent County Council	Y	The Geology and Soils assessment (Chapter 9 of the ES) has been updated to include a minerals assessment.
Heritage Conservation	Request for further detailed evaluation measures including geo-archaeological work.	Kent County Council	Y	Highways England has undertaken a Cultural Heritage Assessment (Chapter 6 of the ES) which references previous archaeological field evaluation and includes an up to date Historic Environmental Record search. A Written Scheme of Investigation will be produced for archaeological intrusive evaluation in advance of construction and in consultation with the Kent County Council Archaeological Team.
Environmental Constraints Plan	Plan does not show non-designated archaeological sites, request to include.	Kent County Council	N	A Cultural Heritage Assessment has been undertaken (Chapter 6 of the ES) which includes a figure of non-designated archaeological sites.
Consultation with	Recommendation to consult with KCC and ABC conservation officers.	Kent County Council	N	The environment team has held several scheme meetings with Historic England (24/03/15 and 08/03/15). A meeting with ABC and KCC took place on 09/05/16 with environmental topic specialists

Consultation response / Topic area		Consultee(s)	Change	Highways England Summary response
conservation officers				(noise, air quality, cultural heritage, landscape, nature conservation and water) to discuss the emerging ES.
Species mitigation	Request that the scheme does not impact on the planning application (14/00906/AS).	Kent County Council	N	Highways England is in conversation with Middlemarch regarding the Stour Park development application.
St Marys Church	Specific concerns about the impact the current proposals will have on the Grade I listed St Marys Church.	Historic England / Kent County Council / Ashford Borough Council	N	A Cultural Heritage Assessment has been undertaken (Chapter 6 of the ES) which includes an assessment of the effects of the Main and Alternative Scheme on the viability and setting of St Marys Church. The assessment outlines that the Main and Alternative have the potential for a residual effect on the setting of the asset as elements of the proposed Link Road and the junction with the A2070 (embankments, lampposts, signage etc.) would be visible from the asset. The proposed Link Road would form a new visual barrier in the landscape to the north and north east of the asset. Design measures such as landscaping would reduce the potential impact on the setting and character of the church. To retain the viability of St Marys Church, pedestrian and road links to the church would be retained throughout construction and operation of the Main and Alternative.
A20 noise	Noise concerns close to the hospice.	Pilgrims Hospice	Y	Levels of noise from the A20 once the Scheme is in place are expected to reduce. Highways England has also incorporated an acoustic bund 2m high to the rear of Summerhill Place, adjacent to the M20 junction 10a eastbound off-slip. Highways England are committed to meet with Hospice during all future stages of the scheme.
Quantitative and cumulative assessments	Request to comment on final assessments.	Public Health England	N	A Combined and Cumulative Effects Assessment has been produced (Chapter 15 of the ES). Due to timelines we will be unable to facilitate a review before DCO application.
NO ₂ levels	Recommend further appraisal of air quality in the ongoing EIA process.	Public Health England	N	An Air Quality assessment (Chapter 5 of the ES) has been undertaken as part of the ES.
Public Health report section	Request for a specific section in the ES.	Public Health England	Y	A standalone Health Impact Assessment (HIA) Chapter has not been included within the ES. However the ES does consider a number of the issues raised by PHE. A HIA Navigation document

Consultation response / Topic area		Consultee(s)	Change	Highways England Summary response
				(Appendix 4.3) has been produced to evidence how a HIA has been integrated into the EIA and signposts the reader to various ES chapters.
Flood risk	References to the drainage plan which should be labelled to reflect the pond numbers discussed in the PEIR.	Environment Agency	Y	The Drainage Strategy is provided as Appendix A to the Flood Risk Assessment (Appendix 14.2 of Chapter 14 Road Drainage and the Water Environment). This has been labelled to reflect the existing ponds and existing outfalls and proposed ponds and outfalls.
Ecology	Comments concerning the PEIR. Request for surveys for otters to be carried out on the Aylesford Stream.	Environment Agency	N	Highways England has undertaken an assessment of Nature Conservation (Chapter 8 of the ES) for which surveys were undertaken in 2010 and 2012 along the stretch of Aylesford Stream within the study area. These surveys did not identify any signs of Otter and the Aylesford Stream corridor was not considered to provide a suitable permanent site for a resident otter.
PEIR advice	Advice provided on 21 December 2015 on the draft PEIR and EIA:	Natural England		
	<ul style="list-style-type: none"> Hatch Park SSSI: a detailed assessment of the impacts to the SSSI and any mitigation measures required should be undertaken, particularly with impacts to the nationally rare New Forest beech lichen and other lichens present within the SSSI. 		N	Chapter 8 of the ES recognises that the ancient pollard woodland located on Hatch Park/ Bockhanger Wood SSSI supports an epiphytic lichen community. The assessment of the site anticipates no impacts on the site during construction and a negligible magnitude of impact on the site during operation therefore no mitigation measures are required. Chapter 5 of the ES (Air Quality) considers air quality impacts on Hatch Park SSSI.
	<ul style="list-style-type: none"> Kent Downs AONB: if there are likely to be impacts to the AONB, these and any mitigation measures should be assessed. 		N	Effects on Kent Downs AONB have been considered within Chapter 7 of the ES (Landscape Visual Impact Assessment). The scheme sits outside the AONB so will not be directly affected, however elevated views (from Devils Kneading Trough) have been captured in the visual impact assessment for which, given the distance from site and long distance view, it is considered that the Main and Alternative Scheme would be barely perceptible from this location. In developing our landscape design proposals, we have been cognisant of the AONB policies and mitigation design requirements.

Consultation response / Topic area		Consultee(s)	Change	Highways England Summary response
	<ul style="list-style-type: none"> Protected and notable species: the application needs to include current survey information along with mitigation measures. 		N	Chapter 8 of the ES and Appendix 8.3 (Protected Species Report) outline the protected and notable species surveys undertaken, potential impacts on them and suitable mitigation measures.
TRAFFIC MODELLING				
Junction 10 east facing slip roads	Request for traffic modelling to include the option of the existing junction 10 east facing slip road to be retained.	Ashford Borough Council	N	The junction will not be modelled as design regulations require the slip road to be closed.
Traffic data and modelling work	Request for traffic modelling work in relation to the scheme.	Kent County Council Ashford Borough Council	N	Uncertainty log, Local Model Validation Report and Forecast Report sent by Highways England to KCC and ABC on 31 March 2016
A20	Council notes it would be concerned if traffic was to show an increase travelling eastbound from junction 10a.	Shepway District Council	N	Eastbound traffic on the A20 east of junction 10a shows a small increase in volume with the scheme in place (less than 100 vehicles per day in 2018 and 2023), with the volumes increasing as the overall network congestion increases (575 vehicles in 2033). This is not due to the scheme but due to growth in traffic arising from development and general background growth.
Traffic	Concerns of traffic close to Hospice site increasing during construction and after.	Pilgrims Hospice	N	Highways England acknowledges an increase in traffic may occur during construction on the A20. All relevant guidelines for restriction and noise levels will be in place. Page 9 of the M20 junction 10a improvement scheme publication advises on forecast traffic numbers up to the year 2033.
Road Network				
A20 between junction 10 and junction 10a	Request for Highways England to take responsibility of road.	Kent County Council	N	This request is outside of the schemes scope and will not be part of the application. Highways England is happy to progress a discussion with KCC on the A20 between junction 10a and junction 10a.
Stour Park Development (SPD)				
Gas Main	Request to work with Highways England on the high pressure gas main.	Friends Life Limited AXA/DMI (FLL)	N	Highways England has an on-going relationship with Friends Life and will continue to engage in both the advance DCO application phases and during the construction stage of the scheme.

Consultation response / Topic area		Consultee(s)	Change	Highways England Summary response
Controlled facilities for pedestrian and cyclists	Request to work with Highways England on the location of a crossing on the A2070 link road.	Friends Life Limited AXA/DMI	N	Highways England is willing to discuss the provision of a crossing with Friends Life Limited AXA / DMI.
Traffic	Request to continue working with each other on Transport Assessment.	Friends Life Limited AXA/DMI	N	Highways England will continue to engage with Friends Life in the detailed design phase.
Barrey Road/ A2070	Confirmation if the Barry Road right turn exit will remain restricted, the junction improvements proposed and if a controlled at-grade pedestrian / toucan crossing is in consideration.	Friends Life Limited AXA/DMI	N	Highways England can confirm that the scheme will make no change to the Barrey Road right turn exit restriction. Junction improvements remain the same as stated during the section 42 consultation. HE can confirm a pedestrian crossing was reviewed but not followed through within the scheme design.
Junction 10a scheme plans	Request to be informed on the continuing detailed design of the junction.	Friends Life Limited AXA/DMI	N	Highways England will continue to engage with Friends Life in the detailed design phase on the scheme plans.
Environmental Statement Assumptions	Comments on the Preliminary Environmental Information Report.	Friends Life Limited AXA/DMI	N	Highways England has noted the assumptions by Friends Life and will continue to liaise with their environmental representative.
Ecological Impact Assessment	It is assumed that the Ecological Impact Assessment will be undertaken in accordance with the Institute of Ecology and Environmental Management guidelines.	Friends Life Limited AXA/DMI	Y	A Nature Conservation assessment has been produced as part of the ES. This follows Design Manual for Roads and Bridges, Volumes 10 and 11 and the Chartered Institute of Ecology and Environmental Management's (CIEEM) publication 'Guidelines for Ecological Impact Assessment in the United Kingdom' (IEEM, 2006).
Great Stour surface water catchment	Request to be kept informed on the scheme and consultation progress.	South East Water	N	Highways England is committed to continuing all discussions with statutory bodies and will keep South East Water advised of the schemes progress.
Landowners and land use				
Land use	Current use of the Wyevale land for fund raising events.	Pilgrims Hospice (PH)	N	Highways England will not be requiring all of the land opposite PH on a permanent basis. Any private arrangements for the use of the land will be a matter for the Hospice and the relevant landowner(s).
Scheme options	Oppose the preferred route option on the grounds it will remove the clients business.	Savills / Wyevale Garden Centres Holding Limited	N	Highways England announced in March 2010 the preferred route for the scheme. Highways England has carried out in-depth consultation with the representatives from the estates and site team

Consultation response / Topic area		Consultee(s)	Change	Highways England Summary response
				for the business throughout 2015. All scheme issues have been discussed and Highways England is happy the representatives understood the schemes requirement for the land. Please see the Statement of Reasons document for further information.
Land requirements	Request for further information on land required bordering Ashford Retail Park.	Vectos on behalf of TH Real Estate	N	Highways England can confirm land is required to re-align the road and to carry out earth works. Highways England will consult with the landowners and provide details as to the extent of land required.
Access to retail park	Request to be informed of any anticipated programme of works.	Vectos on behalf of TH Real Estate	N	A construction strategy will include details on how Highways England will communicate with affected landowners.
Access to field	Details of access arrangements to field adjacent to the A20 and junction 10a.	Mr Houchin	Y	Highways England will provide an alternative access off the A20. The access will be located on the same side of the road roughly 40 metres south of the present entrance.

D.3 Consultee response section 48

Appendix D.3 includes Highways England response received during the section 48 consultation. The content of responses has been refined into disciplines and topics. The disciplines, topics, the associated consultee(s) and Highways England response are organised in the table D.3.1. See Chapter 9.4 of the Consultation Report for key issues raised.

Where relevant the table states where a change has been made. A change is defined as matters or elements related to the present schemes scope, environmental mitigation measures or a change to a future approach.

Table D3-1 Section 48 31 March to 5 May 2016 Consultee Responses

Consultation response / Topic area		Consultee(s)	Change	Highways England Summary response
DESIGN				
Drainage / Flood Risk Assessment climate change allowances (2016)	The scheme requires accommodates the 1 in 100 year storm with a 20% allowance for climate change. Further analysis is undertaken to understand the implications of a greater climate change.	Kent County Council	N	The online storage for all ponds directly upstream of a watercourse are designed to accommodate the maximum water level for the 100 year (+30% climate change) return period critical storm. Following recent consultation with Kent County Council and Ashford Borough Council an exceedance test has been conducted and the proposed storage ponds can accommodate +40% climate change.
Pilgrims Hospice	Site construction compounds proposed adjacent to the hospice causing concern to a sensitive site.	Ashford Borough Council	Y	There is the potential of a small site compound to be located in the vicinity of Pilgrims Hospice. The main site compound would be situated off the A2070 away from the Hospice. Any compound located opposite the Hospice would be subject to measures laid out by the local environmental health officer. Highways England contractors would also be required to apply for the 'Considerate Constructors Scheme'. Part of the schemes focuses on respecting the community. Highways England is committed to meeting with the Hospice representative to talk through proposals specifically
A20 tree removal	Further detail as to the reasoning to remove of tree line adjacent to Pilgrims Hospice.	Ashford Borough Council	Y	Highways England has reviewed the plans and amended earthworks. The trees adjacent to Pilgrims Hospice will not be removed.

Consultation response / Topic area		Consultee(s)	Change	Highways England Summary response
ENVIRONMENT				
Environmental engagement with relevant parties	Request for early engagement between KCC, Highways England, EA and River Stour Internal Drainage Board.	Kent County Council	N	<p>A meeting was held with the Environment Agency on the 20 October 2010, to discuss flood modelling and nature conservation. A subsequent meeting was held on the 17 February 2015 with the Environment Agency and Ashford Borough Council (ABC), to give an update on the progress of the scheme and discuss the proposed methodology for the Flood Risk Assessment. It was agreed during this meeting that as clear span bridges were proposed to carry the new slip roads over the Aylesford Stream, flood modelling would not be required, as there would be no changes to flows of flood extents as a result clear span bridges. Access requirements to the Aylesford stream for maintenance were also discussed, and the EA's requirements have subsequently been considered within the design.</p> <p>ABC's requirements as Lead Local Flood Authority (LLFA) for run-off attenuation, as described in the Sustainable Drainage Strategic Policy Document were discussed. This requires attenuation to the 1 in 100 year (1% AEP) event plus a 30% allowance for climate change, with run-off to be restricted to 4 l/s/ha south of M20 and 2 l/s/ha north of M20. Further meetings were held with the Environment Agency on the 2 September 2015 and the 21 March 2016, to discuss updates to the proposed drainage design and the ongoing environmental assessment work.</p> <p>A meeting was held with ABC on the 9 May 2016, at which the proposed drainage strategy for the Main and Alternative Schemes and the outcomes of the FRA were discussed. Previous discussions about climate change allowances within the site drainage were described, with ABC requesting that a sensitivity test be carried out on a 40% climate change allowance, to ensure that this could be accommodated within the site's drainage system for the 1-in-100 year (1% AEP) event. The results of the sensitivity test demonstrated that a 40% climate change allowance could be accommodated within the attenuation ponds, as described in the Drainage Strategy.</p>
Kingsford Street	Request the proposals involve substantial replanting in the area north of Kingsford Street.	Ashford Borough Council	N	A new hedgerow with intermittent trees will form part of the planting design for the area north of Kingsford Street. The Environmental Masterplan provides full details of the schemes proposals.

Consultation response / Topic area		Consultee(s)	Change	Highways England Summary response
A2070 link road planting	Observation to include substantial planting to supplement SPD planting.	Ashford Borough Council	N	Full design for the A2070 link road planting is presented in the Environmental Masterplan.
Hatch Park / Bockhanger Wood SSSI	Impacts during construction to be considered covering lichens, ecological impacts on the veteran hornbeam pollards and general air quality impacts to local communities.	Forestry Commission	N	Chapter 8 of the ES recognises that the ancient pollard woodland located on Hatch Park / Bockhanger Wood SSSI supports an epiphytic lichen community. The assessment of the site anticipates no impacts on the site during construction and a negligible magnitude of impact on the site during operation. Chapter 5 of the ES (Air Quality) considers air quality impacts on Hatch Park SSSI.
Offsite buffering	Offsite buffering suggestion to intercept dust / pollution created during the construction and operation of the scheme.	Forestry Commission	N	Construction impacts are not significant and no offsite buffering is required (only standard good practice mitigation is required as outlined in Chapter 5 Air Quality). No operational mitigation is required.
Hatch Park SSSI	Recommend to undertake detailed assessment of the impacts of the SSSI and mitigation measures which may be required.	Natural England	N	Chapter 8 of the ES (Nature Conservation) assesses the effects of the Main and Alternative Schemes on Hatch Park SSSI. The chapter outlines that during construction, there would be no loss of habitat or integrity to the Hatch Park SSSI. During operation, Hatch Park would be subject to increased levels of airborne pollutants once operational however air pollution would similarly increase without the Scheme due to increases in vehicle movements and congestion, Therefore no specific mitigation measures have been incorporated.