



Planning Act 2008

DCO Application by Highways England for M20 Junction 10A Improvement

Royal Mail Group Limited (Royal Mail) hereby wishes to notify the Examining Authority under section 89(2A) b of the Planning Act 2008 that Royal Mail is to become an Interested Party to the Examination into the .

Royal Mail is responsible for providing efficient mail sorting and delivery nationally. As a Universal Service Provider under the Postal Services Act 2011, Royal Mail has a statutory duty to deliver mail to every residential and business address in the country as well as collecting mail from all Post Offices and post boxes six days a week.

Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.

Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

The M20 is a strategically important route for Royal Mail operations. In exercising its statutory duties, Royal Mail uses on a daily basis this section of the M20 and all of the main roads in the vicinity of the proposed new motorway junction including the A2070 Southern Orbital Road and the A20 Hythe Road.

As Royal Mail has operational facilities that either run or receive mail services using the M20 and the main roads in the vicinity of the proposed new motorway junction, any additional traffic congestion or delays on these roads during the construction phase may cause significant disruption to Royal Mail operations.

Congestion caused by the construction of the proposed new motorway junction and any resultant disruption to Royal Mail operations could be made worse by any traffic from other major developments in the area.

Royal Mail has taken initial advice on the scheme from a Highways Consultant, PFA Consulting , which has concluded that:

“The construction of the new junction, due to its scale and the duration of the works, will increase, at least temporarily, congestion and vehicle delay in the vicinity of J10 and on other major roads in the area. Traffic management is intended to mitigate these disruptive effects but it is concluded that there will be a significant detrimental impact on Royal Mail operations as a result of road and lane closures, narrow lanes, additional HGVs and the effects of breakdowns and possibly accidents within the works.”

Royal Mail wishes to be an Interested Party to the Examination because it is concerned that its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations may be adversely affected by this proposed scheme.



Royal Mail broadly supports the proposed construction of the new M20 Junction 10A interchange subject to Highway England's agreement on some key issues:-

- Highways England should set out its framework for consultation with major private road users, including Royal Mail;
- The 'Community Relations Strategy' should include proposals to implement a communication programme with key transport and haulage businesses such as Royal Mail, to enable such businesses to plan ahead when key traffic management measures are programmed;
- The proposed 'Traffic and Transport Management Plan' should be prepared, at least in draft, as part of the DCO application; and
- Highways England should fully consider cumulative traffic effects during the construction programme.

Royal Mail may simply rely on this statement but reserves the right to make further representations to the Examination in due course once further information is available.



PROPOSED NEW JUNCTION 10a M20 MOTORWAY BY HIGHWAYS ENGLAND

REVIEW OF POTENTIAL IMPACT OF CONSTRUCTION ON ROYAL MAIL OPERATIONS

1. Introduction

- 1.1. Highways England (HE) has submitted to the National Infrastructure Planning Unit (NIPU) a Development Consent application for the construction of a new interchange junction on the M20 motorway to the southeast of existing junction 10, Ashford, Kent. The proposal is referred to as M20 J10a (the 'Scheme') and includes a new dual carriageway link road to the A2070, Southern Orbital Road (Bad Mustereifel Road) and the A20, Hythe Road.
- 1.2. The M20 motorway is the main strategic route between London and the Channel Ports of Dover and Folkestone and also the Channel Tunnel. It connects to the M25 near Swanley and continues south-eastwards passing to the north of Ashford. The existing J10 connects the A2070 and A20 roads to the motorway (see plan at **Appendix A** from the Environmental Statement Non-Technical Summary).
- 1.3. The existing J10 suffers from severe congestion and vehicle delays, particularly during peak times, and it is predicted that this will significantly become worse in the future. This will partly be as a result of the planned expansion of Ashford with 31,000 new homes and 28,000 new jobs by 2031. To expand capacity and to separate local and longer distance traffic Highways England proposes the construction of the new junction with new connections to the A2070 and A20.
- 1.4. It is understood that three Royal Mail Delivery Offices may be affected by the proposed Scheme, namely:
 - Ashford;
 - Rye and
 - Tenterden
- 1.5. This Note provides a summary of a review of key application documents produced by Highways England and submitted. The documents reviewed included:-
 - Environmental Statement – 'Non-Technical Summary';
 - Environmental Statement – Chapter 1 'Introduction';
 - Environmental Statement – Chapter 12 'Effects on All Travellers'
 - Environmental Statement – Appendix 17.1 'Outline Construction Environmental Management Plan';
 - Report 5.1 – 'Consultation Report'
 - General Arrangement Plans;(Note: all documents dated July 2016)
- 1.6. PFA Consulting, highway and transport consultant, has undertaken the review on behalf of Royal Mail to identify whether the construction of the proposed Scheme is likely to have a serious impact on the transport operations of Royal Mail.

2. Construction and Traffic Management Information

2.1. Should the Development Consent Order be approved Highways England anticipates that construction on site will commence in early 2018 and be fully completed in Spring 2020. The works would be undertaken in phases with certain roads programmed to open early.

2.2. Chapter 12 of the Environmental Statement (ES), 'Effects on All Travellers' reports the assessment of the effects of the Scheme, at both construction and operational stages, on non-motorised users as well as drivers of vehicles.

2.3. The effect on vehicle drivers is assessed as 'Driver Stress' and at the construction stage this is subjective as described below:

"The construction stage assessment has been undertaken by applying professional judgment based on available information regarding the likely presence of Traffic Management (TM) and construction plant, which would be considered to influence driver frustration and fear of potential accidents. Professional judgement has been applied to establish whether Driver Stress would increase or decrease, which will inform the overall significance of effects." (Paragraph 12.3.14 ES Ch 12).

2.4. The application includes little information on the proposed traffic management (TM) during construction of the Scheme apart from stating:

"During construction, TM within the Main Scheme area could result in delays to journey time, leading to increased driver frustration. The presence of construction plant and temporary diversions (which would be required due to the demolition of Highfield Lane Bridge) would also contribute to temporary changes in levels of Driver Stress." (Paragraph 12.8.6 ES Ch 12)

2.5. It is perhaps self-evident that during the two year construction phase there will be significant disruption to vehicle journeys, not only in the immediate vicinity of the construction works, but also on some of the major and local roads in the area. The disruption is not only likely during peak periods but also when sections of road may be temporarily closed or lanes restricted, for example during night time closures. This will include the M20 motorway.

"Construction works would be phased to minimise disruption to travellers, although the closure of the hard shoulder and implementation of narrow lanes would be required, along with full overnight closures of the M20 and a diversion via junction 11." (Table 12.4 ES App 17.1)

2.6. Chapter 12 of the ES indicates that a 'Traffic and Transport Management Plan' will be the responsibility of the Principal Contractor in consultation with HE and HE's design consultant. However, despite stating that the Plan will be produced at pre-construction it is not included as part of the DCO application.

3. Consultation

3.1. Highways England has completed an extensive programme of consultation prior to the submission of the application. The extent of the consultation is reported in 5.1 'Consultation Report'. There was an early 15 month non-statutory engagement during the development of the Scheme followed by a 9 week statutory consultation period between 14 January and 17 March 2016.

3.2. As regards future consultation and liaison The 'Outline Construction Environmental Management Plan' states that the final Plan will include a 'Community Relations Strategy' to be prepared by the Community Relations Officer. The Strategy may include the following:

- Letter drops.
- Community meetings.

- Public exhibitions.
- Publishing articles/documents.
- Liaison with the media.

3.3. However, there is no mention of ongoing communication or liaison with business users, in particular those transport and haulage businesses that will be directly affected by the construction of the Scheme. To enable local Royal Mail Operation Managers to programme operations and take appropriate measures in the likelihood of disruption during construction, Royal Mail should insist that it is specifically advised of programmed traffic management measures such as road and lane closures well in advance of these occurring.

4. PFA Consulting Comments

4.1. The proposed new J10a interchange with connecting link roads will involve major infrastructure works over 2 year period. Once completed it is predicted to alleviate congestion in the local area and allow better access to the M20.

4.2. The scale and construction of J10a will inevitably cause increased congestion, delay and journey times for all road users travelling in the vicinity of the works and on major roads in the area. In particular, when incidents occur in the works, such as vehicle breakdowns or an accident, the likely detrimental effects to traffic flow could be significantly worse than when such incidents currently occur.

4.3. HE accepts that the construction of the Scheme will result in 'high Driver Stress'. However, although extensive pre-application consultation has occurred and the application documentation states a Community Relations Officer will prepare a 'Community Relations Strategy', little detail is provided about the Strategy in the application. In addition, no information, apart from general statements, is provided on traffic management proposals, these being left to the principal contractor.

4.4. As the detail of traffic management will directly affect Royal Mail's operations it will be critical that Royal Mail is informed well in advance of significant traffic management measures and road/lane closures to enable contingency measures to be programmed. For example, Royal Mail may wish to consider if alternative route options are available or hours of haulage need to be altered.

5. Conclusions and Recommendations

Conclusions

5.1. The existing Junction 10 of the M20 motorway regularly operates over capacity with congestion and journey delays, particularly during peak periods. Substantial development in Ashford is planned over the next 15 years which will exacerbate the current congestion and delays. Highways England has submitted a DCO application for a new interchange junction southeast of J10 (known as J10a) which will increase highway capacity and ease congestion by largely separating local and longer distance traffic.

5.2. The construction of the new junction, due to its scale and the duration of the works, will increase, at least temporarily, congestion and vehicle delay in the vicinity of J10 and on other major roads in the area. Traffic management is intended to mitigate these disruptive effects but it is concluded that there will be a significant detrimental impact on Royal Mail operations as a result of road and lane closures, narrow lanes, additional HGVs and the effects of breakdowns and possibly accidents within the works.

5.3. The application documentation indicates that a Community Relations Officer will prepare a 'Community Relations Strategy' but little detail is provided. In addition, no detail of traffic

management measures are set out these being left to the principal contractor although stated as being required at the pre-construction stage.

Recommendations

5.4. It is PFA Consulting's opinion that Royal Mail should broadly support the construction of the new Junction 10a interchange subject to HE's agreement on some key issues:-

- That Highways England should set out its framework for consultation with major private road users, including Royal Mail;
- The 'Community Relations Strategy' should include proposals to implement a communication programme with key transport and haulage businesses such as Royal Mail, to enable such businesses to plan ahead when key traffic management measures are programmed; and
- The proposed 'Traffic and Transport Management Plan' should be prepared, at least in draft, as part of the DCO application.

APPENDIX A – SCHEME LAYOUT (From Highways England’s Non-Technical Summary)

Proposed Main and Alternative Scheme layout

