

M20 Junction 10a

TR010006

Response to Examining Authority's First Written Questions

Report 1: National Policy Statement for
National Networks (NPSNN)



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**Response to Examining Authority's
First Written Questions
(Report 1: National Policy Statement for
National Networks (NPSNN))**

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1. National Policy Statement for National Networks (NPSNN)

Question 1.2

PINS Question Number	First Written Question	Response to First Written Question from Highways England (the Applicant)
1.2	To what extent would the proposed development deliver the objectives of NPSNN to increase the capacity and improve the performance of the Strategic Road Network?	<p>The Main and Alternative Schemes are in accordance with the national policy frameworks. The criteria identified within NPSNN are adhered to within both Schemes. The mitigation measures incorporated into the Scheme ensures that there are no unnecessary impacts on the surrounding environment, and that any impacts that may be incurred are not without sufficient justification.</p> <p>Paragraph 2.1 of the NPSNN states that “well-connected and high-performing networks with sufficient capacity are vital to meet the country's long-term needs and support a prosperous economy”. Through providing additional capacity at junction 10a with the new link road, local traffic will be separated more from the strategic traffic which will deliver greater journey time reliability on the strategic and local route network around Ashford than would otherwise have been the case.</p> <p>Section 6.5 of Case for the Scheme (DCO Document Reference 7.1), ‘Strategic alignment and conformity of scheme with local development plans’, details how the Scheme conforms with the local development plans. It discusses the objectives and themes that are discussed in the following documents:</p> <ul style="list-style-type: none"> - Ashford Borough Council (ABC) Local Development Plans: <ul style="list-style-type: none"> - Core Strategy 2008 - Borough Local Plan 2000 Saved Policies - Urban Sites and Infrastructure Development Plan Document 2012

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		<ul style="list-style-type: none"> - Local Transport Plan for Kent 2011-16. - Kent Mineral and Waste Local Plan 2013-2030. - The Joint Municipal Waste Management Strategy 2006-2026. <p>The aims of the Scheme are directly in line with the national frameworks and illustrate the need for the Scheme on a national level. The Government has highlighted the express need for further growth and improvements to the national networks within the NPSNN. The Route Investment Strategy (RIS), which explores these needs in further detail, has supported the Scheme as a required improvement to the network. Therefore, it can be concluded that the NPSNN is in support of the Scheme, and it therefore should receive full national support.</p>

Question 1.3

PINS Question Number	First Written Question	Response to First Written Question from Highways England (the Applicant)
1.3	Has an adequate assessment of options been undertaken to comply with the requirement in NPSNN para 4.27?	As explained in detail in the "Consideration of Alternatives", Chapter 3 of the Environmental Statement (DCO Document Reference 6.1) the Applicant has explored alternative options for the Scheme and, following public consultation, selected the most appropriate option to address paragraph 4.27. The process has resulted in a 'Main Scheme' and 'The Alternate Scheme'. Both options have been included in the application, to ensure that approval of this application leads to the most efficient and cost effective execution.

Question 1.4

PINS Question Number	First Written Question	Response to First Written Question from Highways England (the Applicant)
1.4	To what extent would the proposed development be sustainable in accordance with NPSNN paras 3.1 to 3.5?	<p>It is predicted that the existing M20 Junction 10 will suffer from increased congestion and long delays in the future arising from the planned growth described in the Greater Ashford Development Framework (GADF) (Ashford Borough Council, 2005). Further capacity is required to alleviate this issue. The Scheme separates the local traffic from the strategic traffic and in the process, reduces the attractiveness of 'rat running' by offering a more effective alternative. This will lead to better local environment conditions, an improved experience for road users and Non-Motorised Users (NMUs), and greater journey time reliability will be provided on the network. Furthermore, an increase in road safety through the use of a 40mph speed limit on the link road, clearer signage and the use of modern materials, and the provision of further sustainable transport infrastructure, will benefit road users both local and regional.</p> <p>As well as creating a new interchange (Junction 10a) on the M20, and a new 2-lane dual carriageway link road to the existing A2070 Southern Orbital Road (Bad Munstereifel Road), the Main and Alternative Schemes will also provide:</p> <ul style="list-style-type: none"> - A new footbridge to replace the existing non-compliant footbridge over the A2070 at Church Road. - New footway / cycleways adjacent to A2070 and link road to improve overall connectivity. <p>The above will improve the experience of all users including NMUs, increase the reliability of the NMU infrastructure and provide increased levels of safety.</p> <p>Each of the technical chapters were written in accordance with National Planning Policy Framework (NPPF) (where applicable) and best practice applied. The Scoping Assessment (DCO Document 6.1, Appendix 4.1) detailed the methodology used to undertake each of the technical assessments, which were agreed with the planning</p>

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		<p>departments at Kent County Council (KCC), ABC and separately with Statutory Environmental Bodies (SEBs).</p> <p>Journey time reliability to the William Harvey Hospital (WHH) will generally be improved, as less congestion is forecast to occur at Junction 10 in the future with the addition of Junction 10A. However, the journey time for those currently travelling to the hospital in an eastbound direction, east of Junction 10 will be longer (estimated to be less than 30 seconds as per the traffic model) via the new link road. A second entrance to the WHH is a local planning issue for which Highways England would be a statutory consultee.</p> <p>The Main and Alternative Schemes minimises any environmental impact by prioritising the avoidance of impacts at source, whether this has been incorporated into the design as embedded mitigation or by regulating the timing or location of project activities. A list of committed environmental mitigation measures can be found in the Outline Construction Environmental Management Plan (CEMP) (Appendix D of DCO Document 6.1, Appendix 17.1). Further details of these mitigation measures can be found within the assessment chapters of the Environmental Statement (DCO Document 6.1, Chapters 5 to 14). Where identified and where possible, enhancements have been designed in to allow for greater connectivity for existing and future biodiversity, cultural heritage features, and landscape character. It has also designed in processes to protect local water quality and reduce flood risk and avoid significant adverse impacts from noise and vibration and air quality.</p>

Question 1.5

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1.5	To what extent would the proposed development deliver appropriate	Social effects describe the human experience of the transport system and its impact on social factors not covered as part of the economic or environmental impacts. The

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	<p>environmental and social benefits as required by NPSNN para 3.3?</p>	<p>additional junction and link road capacity delivered by the Main and Alternative Schemes would help to alleviate future forecast congestion and delays, which would reduce travel times by separating out more local journeys from longer distance trips. Consequently, commuters and other users would benefit from the Scheme through reduced travel times, improved access to suppliers or customers, and reduced vehicle operating costs, such as fuel, vehicle maintenance and mileage-related depreciation. The above improvements are supported by the NPPF, paragraphs 29, 30, 33, 34 and 35.</p> <p>The Main and Alternative Schemes deliver improvements in the local road network, better suited and improved infrastructure for NMUs and vulnerable users, greater journey time reliability and accommodates the anticipated increase in traffic arising from the planned growth as a result of future developments. Changes in journey experience and amenity for NMUs will improve with a decrease in traffic flows along a number of local roads, and the installation of new facilities would also benefit NMUs by providing a decrease of journey lengths and times within a more cohesive and pleasant environment. This is supported by the NPPF requirements, paragraph 35.</p> <p>The Main and Alternative Schemes will have a positive impact on road safety in the Ashford area leading to a forecast overall reduction of six accidents over a 60-year appraisal period, while the accident saving specifically on the Scheme links is forecast to increase by 10. The forecast increase in accidents on the Scheme links is due to an increase in the length of the Scheme compared to the Do Minimum situation, with the new link road and two new junctions and an increase in traffic flow on the A2070 and M20 between J10 and J10a. Overall the accident savings within Ashford more than compensate for the increased accidents in and around J10 and J10a. This is primarily due to traffic re-routing to safer classes of roads. This increase in safety is supported by the NPPF in paragraphs 31, 32 and 35.</p>

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		<p>Throughout the iterative design process, the evidence was considered and opportunities to incorporate mitigation or enhancements were identified. Mitigations measures include, but are not limited to:</p> <ul style="list-style-type: none"> - Enhancement of the wider landscape habitats to ensure species resilience within the remaining triangle of land created by the Main and Alternative Schemes, and consideration on the means of providing connectivity for species that may otherwise be isolated. - Design of balancing and attenuation ponds for landscape, drainage and ecological enhancement. - Enhancement and the increase of remaining habitats so that they are of a higher quality than those which were lost, to ensure a net gain of local species. - Provision of alternative habitats suitable for birds to be able to breed, forage and rest. - Planting, bunding, noise barriers and modified lighting to reduce the impact on local heritage designations and other local receptors. - Significant Heritage assessment and monitoring to investigate, analyse, report and record any buried assets. - Consultation with local landowners with appropriate compensation, where required. <p>The provision of these mitigation measures have been committed to by Highways England.</p>

Question 1.6

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1.6	Are the local authorities satisfied that the traffic forecasts and economic case for the proposed development have been adequately tested through the local transport model, and that the requirements of paras 4.5 and 4.6 of NPSNN have been met? See also Section 19 of this document.	Highways England can confirm that all planning assumptions were agreed with ABC. All of Highways England's work was carried out in accordance with their standards and requirements. Reports of the work have been shared with KCC.

Question 1.7

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1.7	Are the local authorities satisfied that the Applicant has demonstrated good design as required by NPSNN paras 4.28 to 4.35?	The Main and Alternative Schemes have been designed to combat congestion and to provide a modern, high standard strategic route that has the capacity and resilience to cope with the expected growth in road traffic for 15 years after opening, which is in keeping with the requirements of the NPPF, paragraph 4.31. Mitigation measures have been proposed to reduce the landscape and visual impacts of the Main and Alternative Schemes, as per NPPF, paragraph 4.29. These include bunding, noise barriers and extensive tree and shrub planting, which will screen the highway and its traffic flow, integrating the Main and Alternative Schemes (including the borrow pits) into the wider landscape. These mitigation measures are detailed further in the ES (DCO Document 6.1, Chapter 7). Extensive Cultural Heritage assessment was undertaken, particularly due to the proximity of the Main and Alternative Schemes to Grade I St. Mary's Church and 2 neighbouring Grade II buildings. A rigorous mitigation strategy has been designed to ensure planting and

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		<p>screening from noise and light for the Church is effective, and a watching brief will be undertaken during excavation to identify any buried assets discovered.</p> <p>The Main and Alternative Schemes have been designed to provide a safe network for all travellers. The introduction of a 40mph speed limit on the link road, improved signage and the incorporation of roundabouts in the design allows for more free flowing traffic movements, fewer delays on the network at peak times, and improved journey time reliability. Several NMU routes have been incorporated into the design to increase connectivity to the surrounding areas.</p> <p>As discussed in EFQ 1.4, paragraph 4, where significant impacts have been identified during the Environmental Impact Assessment process, appropriate mitigation measures have been applied. Where suitable, enhancement features are also included.</p> <p>The design of the Main and Alternative Schemes are considered to fully meet the objectives for the project which are:</p> <ul style="list-style-type: none"> - To increase the capacity of the road network to support and allow the delivery of residential and employment development either proposed or permitted within the Ashford growth area. - To improve the safety of road users by alleviating congestion around the existing Junction 10 whilst creating the opportunity to enhance local transport facilities for NMUs. - To provide a new route for traffic into Ashford via a new Junction (10a) and dual carriageway link road. - To minimise the environmental impact and where possible allow enhancements to be made to the environment.

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		<p>- To improve journey time reliability on the strategic road network.</p> <p>DCO Document 7.1, Case for the Scheme, fully examines how the Main and Alternative Schemes meet the objectives set for the design. This document further discusses the Main and Alternative Schemes development, previous options, economic case, environmental and social benefits and for strategic alignment and conformity of the Scheme with national planning and government policy including the Design Manual for Roads and Bridge (DRMB). Further information on the design process has been detailed in the Statement of Reasons (DCO Document 4.1).</p> <p>The process was undertaken iteratively with stakeholder engagement incorporated throughout the design process. Key statutory bodies engaged include ABC, KCC, the Environment Agency, Historic England, Natural England, Southern Gas Networks, Friends Life Ltd, Public Health England, ABC Affected Persons and South Ashford Developers. Agreements between Highways England and each of these stakeholders can be found in individual Statements of Common Grounds (SoCG) documents (DCO Documents 8.1- 8.10 respectively). Public consultation was also undertaken for the Main Scheme for 9 weeks between 14 January and 17 March 2016. This ongoing dialogue with professional independent advisers and the general public demonstrates a good, robust design as required in NPPF, paragraphs 4.28, 4.29, 4.31, 4.33 and 4.35.</p>