

Planning & Development

Ask For: Mark Davies
Email: mark.davies@ashford.gov.uk
Direct Line: (01233) 330252



ASHFORD
BOROUGH COUNCIL

Our Ref: 15/0001/NSIP/AS
Your Ref: TR010006
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Civic Centre
Tannery Lane
Ashford, Kent
TN23 1PL
(01233) 331111
www.ashford.gov.uk
Twitter: @ashfordcouncil

The Planning Inspectorate
3B Eagle Wing
Temple Quay House
2, The Square
Bristol, BS1 6PN

Attention: Richard Price

Application by Highways England for an order granting development consent for the proposed M20 Junction 10a.

Ashford Borough Council's responses to deadline 4.

In connection with deadline 4 Ashford Borough Council has submitted the following

Comments on relevant representations volume 10.7 January by Highways England.

ABC's comments on the comment made by Highways England on its relevant representation are attached as Annex 1

M20 Junction 10a Environmental Update report volume 10.13 January 2017

The content of the update report has been noted. In particular in Paragraph 2.1.7 it is noted that the TPO trees at the Pilgrims Hospice have been included in the revised the Arboriculture report (DCO Document 6.1, Appendix 7.1) and the Arboriculture Impact Assessment (AIA) (DCO Document 6.1, Appendix 7.3) and will be resubmitted to the examination in due course. Design changes to the verge to the rear of the footpath to avoid encroaching onto Hospice land have since negated the need for the removal of these trees. ABC had raised in its representations that the Pilgrims Hospice is a sensitive site and any mitigation to reduce potential impacts on it are welcomed.

The land required for the turning circle for the Stour development is shown as an area of planting on Fig 2.7b. This will need to be addressed, given that the DCO will override the planning permission for Stour Park. ABC/KCC need to ensure the delivery of the turning circle.

Response to Examining Authority first Written Questions

ABC has noted the responses and has the following comments:

Question 1.2

Need to include the Ashford emerging local plan to 2030 which is very dependent on Junction 10a coming forward.

Question1.6

On the comment that “highways England can confirm that all planning assumptions were agreed with ABC” – it can be clarified that ABC had confirmed to Highways England the quantum of development and its phasing to come forward or likely to come forward through the existing adopted development plan, emerging development plan and planning permissions.

ABC has not further comments on the documents for deadline 4

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TR01006

3 February 2017

**Ashford Borough Council's representations on Highways England's Comments on Relevant Representations Rev A, Vol
10.7, January 2017
Annex 1**

| PINS Ref RR- 002 | Relevant Representation from Ashford Borough Council – Local Authority | Response from Highways England (the Applicant) | Further comment form ABC |
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| | Overview | | |
| 002.01a | Ashford Borough Council considers there is a compelling need in principle for a new Junction 10a and A2070 link road to provide further capacity to facilitate residential and employment development within the Ashford growth area identified in its existing development plan documents | Noted. | Noted |
| 002.01b | Ashford Borough Council also expects the scheme to avoid and mitigate, environmental and social impacts in line with the principles set out in the NPPF and government planning guidance. Good design should be an integral consideration of the proposals and it must be as aesthetically sensitive as possible. | Mitigation for landscape and visual impacts has been incorporated into the Environmental Masterplan proposals (DCO Document 6.2, Figure 2.6f). The landscaping proposals include native hedges with intermittent trees, native tree planting and specimen trees along the length of the proposed A2070 Link Road, which would provide visual screening of the Main and Alternative Schemes and associated traffic and a strong vegetative northern boundary to the proposed Stour Park | Noted . ABC made some detailed comment on landscaping- in its relevant representation in sections 8 landscape and visual, section 9 arboricultural survey report, section 10 arboriculture implications report and section11 visual impact noise barrier. |

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| | | development area. | |
| 002.01c | The need for additional motorway junction capacity to the south-east of Ashford has been recognised since at least the turn of the century. The South of Ashford Transport Study (1999) highlighted that the limited available capacity at the existing Junction10 would mean that some development proposals in the then emerging Borough Local Plan 2000 would be unable to be fully built out unless a new 'Junction 10a' could be provided. | We are happy that ABC agreed that there is a need for the Scheme. | Noted |
| 002.01d | Since then, the council has adopted the Core Strategy (2008) which remains the principal Development Plan Document for the borough and the subsequent Urban Sites & Infrastructure DPD (2012). Both Documents place significant weight on the need for Junction 10a to be delivered in order for allocated sites to be built out. The council has also granted planning permission for several developments which rely to some degree on Junction 10a coming forward. | Noted. | On 9 June 2016 the Council approved a consultation version of the emerging local plan to 2030. This relies on the delivery of Junction 10a to an even greater degree. |
| 002.01f | Ashford Borough Council has constructively worked with | Noted. | Noted. |

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| | Highways England and our partners at Kent County Council from the pre-application stage. This has included meetings with Highways England and setting up a Junction 10a community group where Ashford Borough Council, Kent County Council and Highways England meet with local residents, parish councils and local members to discuss issues. This is expected to continue during the examination stage. | | |
| 002.01g | Whilst Ashford Borough Council supports the principle of the proposals it has set out detailed issues where there are still objections or concerns and where further changes need to be considered. In addition further information and plans are required in certain areas to fully understand the impacts of the proposals. Some of these were raised at the pre-application consultation stage. | Noted | Noted |
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| 002.02 | Impact on public open space area in connection with works to Church Lane footbridge | | |
| 002.02a | Ashford Borough Council objects to the proposals in their current form as it impacts on existing | It is not believed that the play area will be affected directly by the Scheme. The area affected by the works will be limited to | It still needs to be clarified that the play area will not be affected in any way and that there is adequate |

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| | public open space and play area and at present acceptable mitigation measures have not been provided. | areas immediately adjacent to the existing footbridge and access ramps. | distance to access the public open space from Church Road |
| 002.02b | The works at present are showing permanent and temporary acquisition of land forming part the Church Road Public Open Space area. This land also forms part of the Ashford Green Corridor and is dedicated as a LNR. | The areas of the land designated as a LNR have been identified and will be returned to its original function following construction. The area of LNR habitat shall be equal to or greater than the original area. | Discussions are ongoing with HE regarding the open space issues raised and it is hoped this can be resolved. |
| 002.02c | Highways England and Ashford Borough Council have been in discussion on this matter but this only came to light after the formal pre-application consultation. At present there is no formal statement of common ground between the two parties. Ashford Borough Council's current position is outlined below | Discussions are ongoing with ABC regarding the open space land. An open space replacement strategy report was produced by Highways England and remains with ABC for consideration in order to inform agreement regarding Statement of Common Grounds. A more detailed design drawing has been created to illustrate changes around the proposed bridge and associated ramps and its relationship with existing adjacent landscape features. The plan includes two cross sections to aid information. This drawing also depicts access arrangements. | The area of LNR habitat green area may marginally be reduced due to the larger footprint of the new bridge, The Council has no objection to this but it is not clear how this can be greater. HE provided ABC with a counsel's opinion, which referred to an options Assessment. ABC's solicitor requested a copy of the draft options assessment for the purposes of understanding counsel's opinion only. At the meeting on 15 November HE advised ABC that the options assessment was still work in progress.. If HE could provides ABC with the most up to date draft options assessment ABC will make comments on it. |
| 002.03 | In response to the Statement of Reasons Vol.4 | | |
| 002.03a | Ashford Borough Council agrees as | Noted. | Noted. ABC's comments remain |

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| | shown on drawing number HA514442-MMGJV-Gen-SMW-DE-Z-2204A with the measurements for plot 3/14b and 3/14a that 3/14b needs to be permanently acquired | | unchanged |
| 002.03b | Ashford Borough Council considers that plot 3/14a should also be permanently acquired as the necessary changes in level will permanently affect the accessibility of this land for members of the public and maintenance operations making it unsuitable for use as public open space. Further the necessity of building up levels to ensure a stable raised ramp will also entail the use of fill which will hinder the establishment, survival and appearance of amenity planting and will significantly and permanently change the character of much of this land. | Highways England to discuss with ABC their proposal for plot 3/14/a. It is not considered that there should be any adverse issues associated with levels. Access to the proposed site will be sought either by steps, ramps or alongside the ramp if accessing from the existing Church Road open space. It is considered that Plot 3/14/a will be as accessible as the land which is lost. It is not considered that planting on fill material need be to the detriment of successful plant establishment. Indeed, the existing made ground forming the access ramps to the current Church Road footbridge is successfully planted. | It still needs to be clarified by HE. |
| 002.03c | Ashford Borough Council objects to the proposed replacement land being given in exchange for the following reasons: It is visually and physically severed from the remaining useable open space and has extremely low amenity potential | Access to the proposed replacement land from the existing open space area is via the side of the new ramp. If accessing from crossing Church Road Bridge from Sevington, access is either by steps or ramp directly from the footway/cycleway located below the new Church Road Bridge. | ABC comments remain unchanged |

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| | <p>being a linear strip beside the highway.</p> <ul style="list-style-type: none"> • Access to the replacement land from the existing open space via a ramp going up and then down some stairs, which are not DDA compliant and is likely to adversely affect local people with mobility issues. • The existing land is within the Ashford Green Corridors and is a LNR but the proposed replacement land is not of sufficient wildlife potential to warrant it being part of the Ashford Green Corridor or LNR designation | <ol style="list-style-type: none"> 1. The severance between the open space is planned to be mitigated by the existing footpath being improved to create access between the areas without requiring steps. This will increase mobility into the existing open space. 2. The proposed access between the existing open space and steps are not required to be DDA compliant as there is a pathway which links the open spaces which will improve mobility and access to the existing open space. 3. The majority of the proposed trees selected are locally occurring and selected to provide ecological interest for native wildlife species. <p>Furthermore, the area has not been designed at a detailed level and the species can still be changed to whatever species mix the council desires. These proposals are described in the Environmental Masterplan proposals (DCO Document 6.2, Figure 2.6f).</p> | |
| 002.03d | <p>Ashford Borough Council does not therefore accept that it is suitable for replacement land. Other possible replacement land may be available which is more suitable for replacement land in that it is suitable for inclusion in the LNR and of visual amenity</p> | <p>There is a substantial linear belt of shrubs and trees being provided which is in keeping with local native planting and that of other transient spaces within the local green corridor network. Indeed, it will help to extend the green corridor network for pedestrians and cyclists moving through the area. The</p> | <p>ABC comments remain unchanged</p> |

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| | <p>value and accessibility at least equivalent to the land acquired. This land has been identified to Highways England by Ashford Borough Council but there is no agreement at present with Highways England.</p> | <p>area of land lost as a LNR value is very small, and will be addressed with additional native vegetation. These proposals are described in the Environmental Masterplan proposals (DCO Document 6.2, Figure 2.6f). Issues of access have been addressed in previous responses, however it is not considered that access is hindered as a result of the current proposals</p> | |
| 002.03e | <p>Part of the acquired land will be re-profiled in a way (Section AA on drawing HA514442-MMGJV-GEN-00039-rev B) that effects and prohibits access by members of the public to the public opens space area from Church Road as well as by maintenance vehicles. It is also not clear if the fenced off play area is directly affected. The main lighting scheme (figure 2.5d drawing number HA514442-MMGJV-GEN-SMV-DE-Z-602106 rev A) also indicates a mini pillar to serve the bridge lighting is within the play area. Confirmation of the overall impact on the POS/play area will be needed. A new access point is also likely to be needed and agreed and created at no cost to Ashford</p> | <p>There is currently no accessibility for maintenance through this area as the council have suggested. From local knowledge 3/1/f and 3/14/a are currently fenced off and inaccessible. The fenced off play area is not affected. The lighting column is shown outside of the play area. However, an access/maintenance chamber (FP3) is within the play area. A mini pillar to serve the bridge lighting will be re-located outside the play area, inside the DCO boundary. The drawing HA514442-MMGJV-GEN-SMV-DE-Z-602106 will have to be amended to show this.</p> <p>Access to the park should not be hindered, if necessary a retaining solution can limit the extent of the proposed slope.</p> | <p>There is accessibility for maintenance through this area which is obvious when viewed on site.</p> <p>It still needs to be clarified that the play area will not be affected in any way and that there is adequate distance to access the public open space from Church Road</p> <p>The Council has only known from this answer about the access chamber (FP3) and would wish to clarify with the HE what implications this has for the play area.</p> |

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| | Borough Council | | |
| 002.04 | Stour Park scheme and relationship with alternative scheme | | |
| 002.04a | The council has resolved to grant outline planning permission for the Stour Park development subject to a section 106 planning obligation agreement at the Planning Committee meeting 18 May 2016. | Noted. | Highway England have not objected to the proposals and the Secretary of State has not called in it. The section 106 agreement is under consideration. |
| 002.04b | The illustrative master plan showing the proposed building footprint of the Stour Park development includes the principal access to the site from the access roundabout shown on the A2070 link as the alternative scheme proposals. The council has no objection to this access arrangement | Noted. | Noted. |
| 002.04e | Overall in view of the substantial scale of the Stour Park development the council requests a strong boundary of woodland scale tree planting of maximum depth possible on the southern side of the A2070 and that this supplements similar planting provided with the Stour Park development | The impact of the lighting on bats was assessed in, Chapter 8; Nature Conservation, Volume 6.1 of the Environmental Statement. This assessment concluded that the additional lighting and the operation of the A2070 link road would have a Minor Adverse impact at Local level, but this would be offset by the creation of additional habitat (3 balancing ponds; | The comment was about strong boundary of woodland scale tree planting of maximum depth possible on the southern side of the A2070 and that this supplements similar planting provided with the Stour Park development. This is a matter of landscaping detail, it is hoped can be achieved. |

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| | | 14.19ha of grassland; and 4.89ha of tree, scrub and woodland habitats) and the provision of bat boxes, which would result in an overall Slight Beneficial residual effect is predicted in the long term once the habitats have become established | |
| 002.04f | The Stour Park development identifies the importance of having a sensitive lighting scheme in terms of impact on ecological receptors (bats) and visual & historic receptors (St. Mary's Church and adjoining properties). The proposal is for limiting light spillage in certain areas marked purple as shown on the image attached as Annex 1. | The impact of the lighting on bats was assessed in DCO Document 6.1, Chapter 8; Nature Conservation. This assessment concluded that the additional lighting and the operation of the A2070 link road would have a Minor Adverse impact at Local level, but this would be offset by the creation of additional habitat (3 balancing ponds; 14.19ha of grassland; and 4.89ha of tree, scrub and woodland habitats) and the provision of bat boxes, which would result in an overall Slight Beneficial residual effect is predicted in the long term once the habitats have become established | The Council will accept the judgement of specialist ecologists on this matter. |
| 002.04g | In terms of ecological receptors, the recommendations of the bat conservation trust would be incorporated to ensure that the development mitigates impacts on wildlife. A bat activity map was provided and this highlights in purple ecologically desirable 'dark' areas of | The impact of the lighting on bats was assessed in Chapter 8; Nature Conservation, Volume 6.1 of the Environmental Statement. This assessment concluded that the additional lighting and the operation of the A2070 link road would have a Minor Adverse impact at Local level, but this would be offset by the creation of | The Council will accept the judgement of specialist ecologists on this matter. |

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| | <p>the site and in green conflict zones where street lighting has potential to cause fragmentation of habitat areas thus lessening the value to bats. The Stour Park applicant acknowledges that this would dictate as sensitive approach as possible in the conflict zones. The approach that would be taken in the areas marked purple would be to provide level (e.g. bollard) or directional lighting in order to limit excessive light spill into these areas with design to limit light spill being the subject of computer simulation with lux levels to be less than 1. The junction10a scheme involves new lighting being provided along the A2070 link road in close proximity to this area. The impact of this on ecological receptors in this area also needed to be considered as it has been for the Stour Park development.</p> | <p>additional habitat (3 balancing ponds; 14.19ha of grassland; and 4.89ha of tree, scrub and woodland habitats) and the provision of bat boxes, which would result in an overall Slight Beneficial residual effect is predicted in the long term once the habitats have become established.</p> | |
| 002.05 | <p>Impact on grade 1 listed St Mary's Church and adjoining listed Court lodge complex</p> | | |
| 022.05a | <p>The setting of the grade 1 and adjoining grade 2 Court lodge</p> | <p>A Cultural Heritage Assessment has been undertaken (DCO Document 6.1,</p> | <p>Defer to Historic England who have</p> |

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| | <p>complex is important. The comments from Heritage England need to be considered and whether improvements can be provided such as less highway paraphernalia and more space for landscaping to the noise barrier to the north. There are no details of the new footbridge so this impact on the setting of these buildings cannot be fully assessed.</p> | <p>Chapter 6; Cultural Heritage) which includes an assessment of the effects of the Main and Alternative Scheme on the viability and setting of St Marys Church. The assessment concludes that the Main and Alternative have the potential for a residual effect on the setting of the asset as elements of the proposed new Link Road and the junction with the A2070 (embankments, lampposts, signage etc.) would be visible from the church. 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 Schemes.</p> | <p>made comments on the impact of Sevington Church. It is also stated in the environmental update report volume 10.13 paragraph 2.13. Historic England have expressed interest in the main and alternative schemes in relation to the potential for effects on grade 1 listed St Marys Church and by association the grade 2 listed court lodge and barn in Sevington. KCC have considers the cultural assessment of cultural issues to be reasonable which ABC are happy to defer to and has no further comments.</p> |
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| 002.06 | Air quality | | |
| 002.06a | <p>The context of the Environmental Statement is noted. Further clarification/information is required on the following matters outlined in Chapter 5 of the Environmental Statement.</p> | Noted. | Noted. |
| 002.06b | Further information as to whether there | An Air Quality assessment has been | |

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| | <p>is the potential for DMRB criteria for further assessment to be triggered for the construction phase, specifically (i) Whether changes in speed (either peak-hour or average) at the approaches to 50mph speed limits on the M20 could trigger DMRB criteria; (ii) Whether temporary changes associated with traffic lights on the A20 or changes in speed on the M20 would be likely to be significant.</p> | <p>undertaken (DCO Document 6.1, Chapter 5; Air Quality). This noted that the temporary traffic lights that would be installed on the A20 across the Swatfield Bridge for approximately 7 months may cause queuing, especially during peak periods, on the A20 which has the potential to increase emissions. However, any increase in emissions from queuing would be temporary and for less than a year, are therefore not considered to have any long-term adverse effects. Any effects would be reversible upon completion of the works and therefore not significant.</p> | <p>While it is indeed the case that changes in emissions over a seven-month period would not have any long-term adverse effects, it does not necessarily follow that any temporary, reversible effects would not be significant. DMRB Volume 11 Section 3 Part 1, para 3.6, clarifies that construction should be assessed where expected to last for more than six months. This is not critical, but without further information, ABC cannot satisfy itself that no significant effects will occur.</p> |
| 002.06c | <p>Further information regarding modelled versus observed speeds that led to derivation of traffic speed data in Appendix 5.3.</p> | <p>The proposed traffic management is likely to result in vehicles travelling at a constant free flow speed of 50 miles per hour with fewer speed variations compared to normal operation. The free flow speed coupled with a reduction in speed limit from 70 miles per hour to 50 miles per hour is likely to cause a reduction in vehicle emissions which would benefit air quality. These are quality affects will be temporary and reversible and therefore are not significant</p> | <p>Noted.</p> |
| 002.06d | <p>Clarification as to the apparent minor discrepancy between</p> | <p>This comment is not absolutely clear, however it is assumed the comment</p> | <p>Noted.</p> |

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| | 5.8.12, Table 5.13 and Appendix 5.4 (specifically with respect to receptor 1469). Confirmation that all receptors were fully considered in the 'Main Scheme – Operation' and 'Alternative Scheme – Operation' sections and whether any amendments to the section are necessary | relates to the increase in concentration greater than 0.4µg/m ³ at receptor 1469 presented in DCO Document 6.3, Appendix 5.4 but not included in the assessment of significance in DCO Document 6.1, Chapter 5, Table 5.13. This receptor is located at the garden of the 'French Connection Table' pub at the Orbital Retail park. The air quality objective applicable at this location is for 1 hour averaging periods as discussed in DCO Document 6.1, Chapter 5, Table 5.2. As the annual mean NO ₂ concentration is well below 60µg/m ³ in all scenarios the 1 hour air quality objective is unlikely to be exceeded, as discussed in DCO Document 6.1, Chapter 5, Paragraph 5.3.35. All relevant receptors have been considered for the assessment of significance | |
| 002.07 | Noise and vibration | | |
| 002.07a | <i>The context of the ES is noted. Further clarification/information is required on the following matters outlined in Chapter 9 of the Environmental Statement:</i> (i) Section 9.2 – there is no reference to any local planning policy in respect of noise and vibration as the NPPF would require. | (i) DCO Document 6.1, Chapter 11, Section 11.2.14 refers to local policy. Local policies are further discussed in DCO Document 6.1, Chapter 11, Section 2.9.8. (ii) DCO Document 6.1, Chapter 11; Noise and Vibration assesses the noise impact of the Main and Alternative Schemes. Noise calculations have been based on traffic forecasts and | By simply saying the ES follows the advice of Interim Advice Note 185/15 it hasn't answered the question in regard to whether the scheme's intended relief of congestion will mean that future do-minimum traffic speeds have been over estimated and therefore the difference between do-minimum and do-something noise |

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| <p>(ii) One of the aims of the proposed scheme is to relieve current and ameliorate anticipated future traffic congestion. However, the ES is not clear how the assessment has addressed the way in which congestion in future “Do–minimum” scenarios will influence the speed of traffic on the roads evaluated. This is potentially important as congestion often results in a drop in traffic speed and can cause the associated noise level to fall, if not over the whole of a 16 or 18 hour day to be reduced for substantial periods during that time. Consequently, it is not clear if the calculated difference between “Do– minimum” and “Do- Something” noise levels appropriately reflects the likely difference between the “Do–minimum” scenarios with congestion and the DS scenarios without, or at least with less, congestion. Clarification of if and how traffic congestion in the opening and design year “Do–minimum” scenarios and whether the assumed future “Do–minimum” noise predictions allow for</p> | <p>assumptions within those forecasts. Notwithstanding this, forecast speeds have been derived using Interim Advice Note 185/15 which provides guidance on assigning more realistic speeds on a link-by-link basis. In this way a more realistic comparison can be obtained between scenarios with differing traffic conditions. With respect to benefits of a thin surface course, in accordance with DMRB these have been incorporated into the calculation process and are reflected in the findings.</p> | <p>levels under estimated. This is important because the Interim Advice Note 185/15 at section 5.4 says the following:</p> <p><i>5.4. Noise Consideration of Alleviating Congestion</i></p> <p><i>There is a potential where a scheme alleviates periods of congestion and the traffic moves into free flow conditions that noise levels could increase by approximately 3dB(A) during individual peak periods. Professional judgement of the noise specialist should consider whether the impact of noise during these periods needs to be assessed separately and if necessary any mitigation measures are required.</i></p> <p>Neither the ES nor the response to the question states whether or not the professional judgement of the noise specialist (with justification) has been exercised on this issue; and if so, what was the outcome.</p> |
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| | reduced speed and therefore lower noise levels associated with congestion, is therefore recommended | | |
| 002.07b | It should be explored whether the use low surface noise surfacing throughout the scheme add any material benefits in terms of noise and vibration. | Highways England will specify thin surface course surfacing which will mitigate noise from the Main and Alternative Schemes (refer to DCO Document 6.1, Chapter 11, Paragraph 11.7.2). The exception will be A20 as will remain in KCC maintenance responsibility | The scenario has not then been explored |
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| 002.08 | Effects on All Travellers | | |
| 002.08a | The context of the ES is noted. Further clarification/information is required on the following matters outlined in Chapter 12 of the Environmental Statement (i) The chapter refers to traffic models, but is not specific as to which have been used. It seems likely that appropriate models have been employed (e.g. an area-wide model such as SATURN, and/or specific junction models such as ARCADY or PICADY. (ii) Clarification sought over whether the traffic data has been predicted for the construction period | i): The area-wide or strategic model used for the economic case is a SATURN model linked to a DIADEM variable demand model. Junction modelling of the Scheme was carried out using VISSIM with some inputs derived from LINSIG. (ii): The SATURN/DIADEM model was used to model the main stages of construction for the purposes of quantifying construction delays and costs that fed into the economic analysis. This was done in preference to using QUADRO. The 2018 and 2023 forecast models were used as noted in Section 5 of the EAR to represent construction between 2018 and 2020, with bespoke TUBA runs providing the construction disbenefits to the | Noted |

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| | | overall economic assessment | |
| 002.09 | Landscape and visual | | |
| 002.09a | <p>The areas likely to experience the greatest landscape effects are those adopted Landscape Character Areas physically affected by the proposed scheme and those which lie immediately adjacent to the proposals e.g. Mersham Farmland and Brabourne Lees Mixed Farmland. It is considered that the significance of landscape effects on these two landscapes in Year 1 and Year 15 have been underestimated.</p> | <p>The visual impact of the Main and Alternative Schemes is assessed in the Environmental Statement (DCO Document 6.1, Chapter 7; Landscape). This assessment has been carried out in accordance with the Design Manual for Roads and Bridges (DMRB) Volume 11, and also uses the Guidelines for Landscape and Visual Impact Assessment, identifying landscape and visual baseline including value and sensitivity to change, prior to considering appropriate mitigation, the magnitude of change and resulting significance of effect. It is believed this comment refers to Mersham Village rather than Mersham Farmland given Mersham Farmland will be directly affected by the Scheme. Both Mersham Village and Brabourne Lees Mixed Farmland and neighbouring Mersham Farmland, remain visually disconnected from the Scheme in the vast majority of cases, with only partial/limited connectivity to neighbouring landscapes, and therefore the overall character of these Landscape Character Assessments (LCA) will not be significantly affected by changes in landscape features</p> | <p>The comment is regarding Mersham Farmland not Mersham Village. Comments noted, although concerns over judgements on overall effects remain.</p> |

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| | | within the neighbouring LCA. There may be localised reductions in audible tranquillity however this would be set in the context of the M20 and A20 immediately adjacent to the works site. | |
| 002.09b | In relation to visual receptors it is considered that the visual effects of the scheme have in a number of cases been underestimated either because they were not assessed, because the additional effects of the alternative proposal were not properly articulated or because ancillary aspects of the proposals were not sufficiently taken into account | The visual impact of the Main and Alternative Schemes is assessed in the Environmental Statement (DCO Document 6.1, Chapter 7; Landscape). This assessment has been carried out in accordance with the Design Manual for Roads and Bridges (DMRB) Volume 11, and also uses the Guidelines for Landscape and Visual Impact Assessment, identifying landscape and visual baseline including value and sensitivity to change, prior to considering appropriate mitigation, the magnitude of change and resulting significance of effect. Visual receptors have been grouped in cases where similar views are afforded. The effects of the Main Scheme design are considered to have been addressed sufficiently in line with DMRB guidance. Variations to the Main Scheme effects, associated with the Alternative Scheme, have been identified and explained under the section 'Predicted Effects of Alternative Scheme'. | Comments noted although concerns remain. Assessment of visual effects should consider all aspects of the scheme including ancillary development such as barriers and lighting. |
| 002.09d | <i>A significant amount of existing established landscaping will be</i> | (i) Mitigation for landscape and visual impacts has been incorporated into | Noted |

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| | <p><i>removed. It is important that substantial replacement and new planting is provided in particular the following locations.</i></p> <p>(i) The approaches along M20 corridor which currently are characterised by dense tree-lined landscaping. The planting proposals should look to continue and retain this characteristic.</p> <p>(ii) Along Kingsford Street which currently has a narrow rural lane tree-lined character. The planting should look to continue this characteristic.</p> <p>(iii) The A2070 link road should have substantial landscaping provided along the southern end in particular and this integrates with landscaping provided for the substantial Stour Park development. The landscaping providing should include woodland scale planting.</p> <p>(iv) The northern end of the A20 where existing boundary landscaping along the highway is lost through the realignment of the road. Replacement boundary planting along the A20 with suitable trees will need to be provided.</p> | <p>the Environmental Masterplan (DCO Document 6.2, Figure 2.6f). This area is currently proposed as linear belt of native shrubs and trees to replicate the existing character of the site adjacent to the Junction 10A eastbound offslip. On the westbound carriageway the proposed planting scheme has introduced linear native woodland strips to an area where there was previously no substantial vegetation.</p> <p>(ii) The replacement planting will include a native hedge with intermittent mature trees with native woodland planting set behind it. Over time this will develop to retain the character of the street.</p> <p>(iii) There is an inadequate amount of space to provide "substantial woodland planting" along the southern end of the A2070. The Stour Park development have adequate room within their boundary to accommodate more substantial woodland planting but this is outside of our site boundary. Every effort has been made to provide as much vegetation as possible within the space available.</p> <p>(iv) Substantial woodland planting is being provided where the A20 meets the new proposed J10a, the area could be increased at the northern end</p> | |
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| | <p>(v) The area around the new Church Road footbridge. The replanting on the western side and screening lost located close to the nearest dwellings along Nightingale Close is likely to result in overlooking from the footbridge. On the eastern side screening to St Mary's Church and the Court Lodge complex, more initial substantive panting is likely to be needed in these areas</p> | <p>and include more substantial trees. This will be explored further at the next design stage. (v) More substantial planting can be provided near Court Lodge side of Church Road footbridge. In addition, it has been assumed that the retained intervening trees along the edge of Church Road will still provide screening value. Likewise, retained vegetation will offer screening value to some properties on Nightingale Close. Over time, proposed vegetation along the ramp embankments will establish to provide further screening to these properties. Opportunities will be explored during the next design phase to include examples of more mature species to break up views to and from the footbridge for the small number of properties that may be effected</p> | |
| 002.10 | <p>Appendix 2.2 provides the indicative planting schedule. The final detail planting will need to be clear</p> | <p>This will be provided at the relevant detailed stage in the development</p> | <p>Noted</p> |
| 002.10a | <p>Further clarification/information is required on the following matters outlined in Chapter 7 of the Environmental Statement: (i) It would be helpful to have an aerial photograph with the proposed scheme overlaid so that the features associated with</p> | <p>(i) An aerial photograph will be provided to the Examination with the Scheme overlaid. (ii) Environmental barriers have been included on the Environmental Masterplan (DCO Document 6.2, Figure 2.6f). Given the scale of the masterplan it is considered that lighting</p> | <p>(i) Noted (ii) Appreciate there is always a balance between providing information and legibility of drawings. However mitigation proposal drawings are produced at 1:500 and</p> |

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| | <p>the scheme could be readily placed in the existing landscape patterns and topography</p> <p>(ii) It would be useful if the environmental masterplan proposals included all aspects of the scheme which can have a visual cumulative effect including barriers, signage and lighting</p> <p>(iii) It is unclear why only three of the key viewpoints have been made into montages and not others.</p> <p>(iv) St Mary's Church is not shown on Figure 7.9b although it is expected that the removal of vegetation along the M20 will open up views to the church in Year 1.</p> <p>(v) The main LVIA document does not set out all volumes relevant to the chapter at the start of the chapter which would aid navigation and cross referencing.</p> <p>(vi) There is no reference to the Ashford Green and Blue Grid prepared by Shields Flynn (2008)</p> <p>(vii) No reference is made to landscape impacts and in particular physical and perceptual impacts</p> | <p>and signage are best placed on standalone drawings, as these features may not be easily identifiable on the masterplan drawings.</p> <p>(iii) ABC was originally consulted regarding potential key visual receptors and asked if there were any particular areas they felt should be addressed within the assessment. The response referred back to the original scoping report which did not detail any key views within close proximity to the Scheme. As such photomontages were undertaken for a small number of viewpoints where it was considered that views to the Scheme could be informative in supporting the Landscape and Visual Impact Assessment and general understanding of the Scheme by means of graphical presentation within the Environmental Statement (DCO Document, Volume 6.2, Figures 7.9b to 7.9k). These were chosen to best represent the Scheme from a series of locations and angles. An additional photomontage was provided representing views from St Mary's church as a direct outcome from consultation with Historic England.</p> <p>(iv) The Church will be visible in Year 1 and will be added to the photomontage which will be submitted to</p> | <p>could have included lighting without loss of legibility.</p> <p>(iii) Noted</p> <p>(iv) Noted</p> <p>(v) Noted</p> <p>(vi) The Ashford Green and Blue Grid study made a specific reference to improving public access and enhanced landscape and biodiversity of the floodplain. Whilst the principles of landscape and biodiversity may be understood there is no discussion on how this aspiration in the Green and Blue Grid has been considered and on how access and the reinforcement of valley character has been maximised, or what barriers exist to prevent it from being realised.</p> <p>(vii) Noted</p> <p>(viii) Accepted that Viewpoint 11 is representative of views along this footpath. However as one moves a short distance northwards views open up to the northwest. The existing A2070 is not visible due to cutting but the proposed roundabout junction</p> |
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| | <p>(viii) Not all important visual receptors appear to have been picked up during the assessment. For example it is considered that key visual receptors also exist on the Public Right of Way which heads north from adjacent to St Mary's Church.</p> <p>(xi) No information is provided on the physical loss of trees, vegetation, grassland and arable land as a result of the proposed development, although it is noted that the plans in Appendix 7.1 Volume 3.2 show trees and hedgerows for removal</p> <p>(xii) It is unclear why the alternative proposal is not also assessed separately for Visual Receptors 1 and 2 both of which would afford views cross the Aylesford Stream to the rising land beyond.</p> | <p>the Examination.</p> <p>(v) Noted</p> <p>(vi) Whilst specific reference to the Ashford Green and Blue Grid has not been made within the Environmental Statement, the principles for creating continuity with established green corridors has been considered and implemented within the environmental design for the Scheme. The importance of continued connectivity both for landscape and biodiversity benefits is well understood, as well as the important aesthetic qualities of green corridors, and has been reflected in the design.</p> <p>(vii) There is a section dedicated to landscape effects within the landscape chapter of the Environmental Statement.</p> <p>(viii) The footpath adjacent to St Mary's Church was identified under receptor number 11 which captured the view from the intersection of PROW AE337A and AE639 looking towards the new Junction 10A.</p> <p>(ix) The composition of the Main and Alternative Schemes are almost identical, with of course the exception of the new roundabout. Given the relatively small nature of the change, many receptors remained unaffected by the new junction and therefore only</p> | <p>connecting to the A2070 would be visible and in close proximity.</p> <p>(ix) There is agreement that the alternative scheme does result in a change, albeit small. Whilst it is accepted that only receptors noting a change as a result of the additional roundabout are mentioned in the Alternative Scheme impacts description, no actual description of the effects of the additional roundabout are given. e.g. Viewpoint 11 where the description for the Alternative Scheme is identical to the Main Scheme. A description of the effects of the additional roundabout would be expected.</p> <p>(x) Noted and worth considering in order to balance the effects of noise and landscape</p> <p>(xi) Noted, however an indication of the area of grassland lost, length of hedgerow lost, number of mature trees removed and area of woodland removed is often provided in LVIA. Focus is on the quantity of landscape elements removed rather than habitat lost specifically.</p> |
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| | | <p>receptors noting a change resulting solely from the addition of the roundabout were mentioned in the Alternative Scheme impacts description.</p> <p>(x) For maintenance of the fence a distance of 1.5m is required, the fence has been positioned for optimal reduction of noise. Following consultation with the noise specialists it may be possible for the fence to be moved out of the optimal position to allow for more planting, although this would require additional work at the next design phase.</p> <p>(xi) The loss of habitats and broad Phase 1 classified land is detailed in the Extended Phase 1 Report, (DCO Document 6.3, Appendix 8.1).</p> <p>(xii) Viewpoint 2 represents a PROW which would be closed as part of the Scheme. Therefore the receptor would be removed from future consideration. With regards to Viewpoint 1 it is not considered that the Alternative Scheme would lead to a notably different change in scene in the context of the wider view from this location and as such, to avoid repetition was not addressed separately for the Alternative Scheme.</p> | <p>xii) Noted but it is considered that the Alternative Scheme roundabout is likely to intensify effects on the stream valley slopes, given the proximity of the view and the foreground of the valley</p> |
| 002.11a | Arboricultural Survey Report Appendix 7.1 | | |

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| 002.11a | <p>TPO trees at Pilgrims Hospice boundary with A20 Hythe Road.</p> <p>The arboricultural survey report appendix 7.1 indicates no TPO trees are affected which is incorrect. The belt woodland trees on the southern boundary of the Pilgrims Hospice is protected by Tree Preservation Order No.22, 1998. The TPO has not been picked up in the survey which states that no TPO trees will be affected. The trees are included within the wider area of W1 of the survey and are mentioned as being implicated in the Arboricultural implications assessment.</p> | <p>ABC's interactive website map did not show any trees within the boundaries of the Main and Alternative Schemes when used at the time of compiling the Environmental Statement (Volume 6.3, Appendix 7.1). However now the Tree Preservation Order trees at Pilgrims Hospice have been identified the design has been altered and no trees within Pilgrim house land will be affected. A site visit to ascertain the full arboricultural impact on woodland W1 on 15th November will also be used to review Root Protection Areas of trees bordering Pilgrim Hospice land to provide assurances of this. The Arboricultural Survey Report (DCO Document 6.3, Appendix 7.1) and Arboricultural Implications Assessment (DCO Document 6.3, Appendix 7.3) will be updated to reflect the results of the additional visit and resubmitted to the Examination.</p> | Noted |
| 002.11b | <p>The belt of woodland trees is an important visual feature and provides screening to the hospice from the busy A20 road. This will be of increasing importance with the construction of the Junction 10a link road. The loss of these trees is unacceptable on the grounds of visual amenity</p> | <p>As above and woodland W1 will not be removed completely, rather a strip of approximately 30m will require felling to facilitate the works on the A20 embankment. The full impact will be assessed in a site visit on November 15th and the Arboricultural Survey Report (DCO Document 6.3, Appendix 7.1) will be updated to reflect the results</p> | Noted |

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| | and needs to be addressed at this early stage | of the additional visit and resubmitted to the Examination | |
| 002.11c | Page 8, paragraph 6 of the Executive Summary states that there are 36 tree groups in the survey, however the Schedule of Trees as well as page 14 paragraph 2.1.9 specifies that there are 35 groups which have been surveyed. An error in counting group G30 twice in the Schedule of Trees has resulted in inconsistency in the report | The Arboricultural Survey Report (DCO Document 6.3, Appendix 7.1) and the Arboriculture Implications Assessment (DCO Document 6.3, Appendix 7.3) state 36 groups of trees | Noted |
| 002.11d | Page 10, paragraph 1.5.1 states that the survey was undertaken by a qualified Arboriculturalist, please can the level of qualification for example 'level 3' qualification be specified. While this may not be a statutory requirement clarification concerning the competency of the surveyor would be required in line with best practice | A copy of the Arboriculturalist's CV and qualifications can be supplied if required. | Noted |
| 002.11e | Page 13, paragraph 2.1.2 to 2.1.4 discusses 'grouping' of trees in the survey. In the absence of clarification it is assumed that the groups were selected in accordance 4.2.4 (B) of BS 5837:2012 | The groups were assessed under section 4.4.2.3 of BS 5837:2012 taking in to account the note following 4.4.2.3 within BS5837:2012 which reads: " <i>The term "group" is intended to identify trees that form cohesive arboricultural features either aerodynamically (e.g. trees that provide companion shelter),</i> | Noted |

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| | | <i>visually (e.g. avenues or screens) or culturally, including for biodiversity (e.g. parkland or wood pasture), in respect of each of the three subcategories (see 4.5)".</i> | |
| 002.11f | <p>Page 13, paragraph 2.1.4 discusses hybrid black poplar trees. Was a check made to establish if these were hybrid or native black poplar trees, as native black poplar are nationally important and may require special consideration or upgrading of their category status.</p> | A physical inspection of the trees indicated that these were hybrid black poplar rather than native. The physical feature reviewed included a) the leaves were flat based and not diamond b) the leaves were heavily rather than shallowly toothed, c) there were no spiral galls on the leaf stem (the presence of which would have indicated that these would be native as the gall is reportedly present on all the native population) d) the overall habit of the trees was upward ascending branches rather than downward curving | Noted |
| 002.11g | <p>Page 24, Appendix B. Species list cross referencing common names with scientific/botanical names is missing from the report.(paragraph 1.5.6</p> | A full Latin species list will be added to the Arboricultural Survey Report (DCO Document 6.3, Appendix 7.1) which will be revised and submitted to the Examination. | Noted |
| 002.12 | Arboricultural Implications Report Appendix 7.3 | | |
| 002.12a | <p>Page 8, paragraph 2 of the Executive Summary states that the Arboricultural Implications Report should be read in conjunction with M20 Junction 10a Arboricultural Survey Report (June 2016)</p> | Noted, Arboriculture Implications Assessment (DCO Document 6.3, Appendix 7.3) references to be checked and updated where necessary in the revised version. | Noted |

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| | document reference 341755-09-300-RE-02-A, however the Survey Report we have reviewed is reference July (2016) reference HA514442-MMGJV-GEN-SMW-RE-Z-630701, and therefore does not correspond | | |
| 002.12b | Page 8, paragraph 2 of the Executive Summary states that 36 groups of trees were surveyed, however this does not correspond with the Schedule of Trees in the Arboricultural Survey Report which states 35 groups. | The Arboricultural Survey Report (DCO Document 6.3, Appendix 7.1) and the Arboriculture Implications Assessment (DCO Document 6.3, Appendix 7.3) state 36 groups of trees. | Noted |
| 002.12c | Page 11 paragraph 1.4.1 states that due to minor changes in the scope of works, a revised Arboricultural Survey report was issued. Clarification is required to whether the latest report corresponds to report reference July (2016) reference HA514442-MMGJV-GEN-SMW-RE-Z-630701 | Arboriculture Implications Assessment (DCO Document 6.3, Appendix 7.3) references to be checked and updated for the revised version, which will be submitted to the Examination. | Noted |
| 002.12d | In Section 3 there is no reference to root incursion analysis of root protection areas of impacted trees or specific construction mitigation recommendations. While it is not a requirement of BS 5837, it is established industry practice | Generally, Root Protection Areas incursions should not occur on site as protective fencing should exclude construction activity from these. However, if there is uncertainty remains for specific issues, Arboricultural Method Statements will be produced to highlight | Noted |

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| | to undertake an assessment of root protection area incursions. | any necessary mitigation | |
| 002.13 | Visual impact of 3m Noise barrier along Kingsford Street and A2070 | | |
| 002.13a | The 3 m acoustic barrier will be a visually prominent feature in places. Although it is recognised that mitigation for noise is crucial it is important that the barrier is visually screened and properly integrated into the existing landscaping scheme in the best way possible | The limited space available along Kingsford Street will necessitate the removal of existing vegetation to allow the construction of the new shared footway/cycleway and noise barrier. A new hedgerow with intermittent trees will form part of the planting design for the area north of Kingsford Street. Proposed native tree and scrub planting will be provided to the rear of the noise barrier, providing screening for the new slip road and the existing M20 corridor. The Environmental Masterplan (DCO Document 6.2, Figure 2.6f) provides full details of the Scheme's proposals. | See the comments below on specific area where it is asked if improvement to landscaping is possible. |
| 002.13b | There are certain locations the barrier may be particularly intrusive and changes to the siting/landscaping should be considered if these still provide the required noise mitigation | The limited space available along Kingsford Street will necessitate the removal of existing vegetation to allow the construction of the new shared footway/cycleway and noise barrier. A new hedgerow with intermittent trees will form part of the planting design for the area north of Kingsford Street. Proposed native tree and scrub planting will be provided to the rear of the noise barrier, providing screening for the | See the comments below on specific area where it is asked if improvement to landscaping is possible. |

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| | | new slip road and the existing M20 corridor. The Environmental Masterplan (DCO Document 6.2, Figure 2.6f) provides full details of the Scheme's proposals | |
| 002.13c | <p>The start of the Kingsford Street footbridge on the Kingsford Street side, the barrier is located right up to the footpath from Kingsford Street with no planting/ screening in between. This may look oppressive when walking along the footway.</p> <p>Consideration should be given to setting the barrier further back into the native shrub and tree planting area. There are also two listed buildings located close-by - Ransley Cottage and Redburr and their setting would potentially be enhanced with better screening</p> | <p>The limited space available along Kingsford Street will necessitate the removal of existing vegetation to allow the construction of the new shared footway/cycleway and noise barrier. A new hedgerow with intermittent trees will form part of the planting design for the area immediately adjacent to north of Kingsford Street. Proposed native tree and scrub planting will be provided to the rear of the noise barrier, providing screening for the new slip road and the existing M20 corridor. The Environmental Masterplan (DCO Document 6.2, Figure 2.6f) provides full details of the Scheme's proposals.</p> | <p>HE comment do not appear to directly address the point.</p> <p>It is not clear the HE have looked if the barrier can be set further back as suggested which may be an improvement and yet provide the required noise mitigation?</p> |
| 002.13d | <p>The barrier along the corner of Highfield Lane by the Junction 10a roundabout is exposed without any screening landscaping</p> | <p>The Environmental Masterplan (DCO Document 6.2, Figure 2.6f) provides full details of the Main and Alternative Scheme's proposals. The Landscape assessment within the Environmental Statement (DCO Document 6.1, Chapter 7) showed that no sensitive visual receptors have a direct outlook towards this section of barrier and as such the fencing has been placed to</p> | <p>HE comments do not appear to directly address the point made.</p> <p>Can more screening be provided with a minor repositioning of the barrier which may be an improvement and yet provide the required noise mitigation?</p> |

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| | | be as close to the noise source as possible. | |
| 002.13e | The initial barrier along the southern side of the A2070 near the Junction 10a interchange is right up against the footway/cycleway without any screening landscaping | The Environmental Masterplan (DCO Document 6.2, Figure 2.6f) provides full details of the Main and Alternative Scheme's proposals. The Landscape assessment within DCO Document 6.1, Chapter 7 indicated that no sensitive visual receptors have a direct outlook towards this section of barrier and as such the fencing has been placed to be as close to the noise source as possible. | HE comments do not appear to directly address the point made. Can more screening be provided with a minor repositioning of the barrier which may be an improvement and yet provide the required noise mitigation? |
| 002.13f | The barrier on the southern side of the A2070 roundabout has little or no landscaping screen and is partly sited on a noise bund. A cross section needs to be provided through this | The Environmental Masterplan (DCO Document 6.2, Figure 2.6f) provides full details of the Main and Alternative Scheme's proposals. Landscape screening is present, albeit quite narrow due to restrictions on space in this area. There will however be planting in front of the barrier to break up the timber face. Both the area in front of the fencing and the bund itself will be planted. | HE comments do not appear to directly address the point made. Can more screening be provided with a minor repositioning of the barrier? |
| 002.13g | There needs to be confirmation that there is no problem with planting in particular larger specimen trees being planted close to barriers or highway hard surface areas in terms of impact on roots | The Environmental Masterplan (DCO Document 6.2, Figure 2.6f) provides full details of the Main and Alternative Scheme's proposals. Detailed design can ensure appropriate interventions are made to provide suitable growing environments for standard trees through | Noted |

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| | | the use of plastic cells such as arborcraft or silvercells underneath hard surfacing to extend tree pits if necessary. The appropriate specification of tree species and form should prevent conflict with barriers. | |
| 002.14 | Flooding and drainage | | |
| 002.14a | The report refers to Ashford Borough Council as the Lead Local Flood Authority when it is actually Kent County Council. | The error within DCO Document 6.3, Appendix 14.1 the Flood Risk Assessment (FRA) is noted. An updated FRA will be produced to include ongoing modelling work, in which this error will be amended. | Noted |
| 002.14b | With regards to the technical details then there are no objections to the runoff rate and methodologies being proposed. As discussed with Highways England throughout the process the design has focussed on ensuring Ashford Borough Councils local Sustainable Drainage SPD by seeking to limit runoff rates to those identified within the aforementioned document. Due to the betterments that achieving these rates can provide it is considered positive that HE are seeking to generally achieve these rates across the proposed | Noted. | Noted. |

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| | scheme | | |
| 002.14c | <p>Pond 3 of the development a runoff rate of 4l/s/ha has been opted for rather than the 2l/s/ha (As stated in the Sustainable Drainage SPD) for the area north of the M20, however it is likely that ground conditions here will be similar to the rest of the development, with the underlying geology being of Hythe formation and therefore of low permeability. Furthermore, as identified within the available documentation, due to the area being drained to pond 3 being just over 1Ha the control rate would be limited to just above 2l/s, whilst small orifice controls can achieve the lower discharge rate, and with regular maintenance can continue to ensure the risk of blockages is very low, as this scheme involves national critical infrastructure the discharge rate of just over 5l/s from pond 3 is deemed acceptable</p> | Noted. | Noted |
| 002.14d | <p>Appropriate levels of treatment are considered to be in place before the water finally discharges into the Aylesford stream.</p> | <p>Maintenance work for the Main and Alternative Scheme will be managed by Highways England 'Area 4' team, which is operationally responsible for the</p> | Noted |

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| | The use of ponds, when used in conjunction with appropriate vegetation, can enhance treatment process and biodiversity. However, appropriate maintenance will be required and consideration given in the final design to ensure that sufficient capacity is provided within the ponds, even during periods when these may be heavily vegetated | strategic road network | |
| 002.15 | Funding statement | | |
| 002.15a | Paragraph 3.1.9 states the following: "The contribution from local developer is reliant on a grant funding agreement between the Homes and Communities Agency (HCA) and Ashford Borough Council...". This needs amending as the contribution from local developer reliant on a loan or grant funding agreement, between the Homes and Communities Agency HCA and Ashford Borough Council | Noted - document to be amended. | N-oted |
| 002.16 | Highfield Lane | | |
| 002.16a | It should be explored if a closure of the vehicular link between Kingsford Street and Highfield Lane needs to be provided as | Highways England considers this request to be outside of the Scheme's scope. There is no justification from traffic modelling to justify this | Noted |

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| | part of these proposals for Junction10a to prevent unreasonable levels of rat-running through Mersham village. | incorporation in the Scheme. Highways England have been informed by Stour Park developers that this work has been included in their section 106 agreement with ABC. Highways England will work closely with Stour Park Developers to ensure that this will be incorporated. Highways England have also been informed by Kent County Council that they will forward fund this work and will implement before the opening of the Scheme. They will work with Stour Park Developers to form an agreement. | |
| 002.17 | Barrey Road | | |
| 002.17a | The council had previously requested that there is a right hand signalised turn-out from Barrey Road onto the A2070. It is regretted that a right hand turn from the Barrey Road junction is not included as part the proposals | Highways England understand concern regarding the Barrey Road exit onto the A2070, we notice that a number of residents have raised similar concerns in the relevant representations. The last traffic assessment of the Barrey Road Junction was done prior to 2013 when permission to occupy the empty units in the Ashford Retail Park was given, and at that time it was indicated that there would be a negligible impact on traffic overall. Therefore | Noted |

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| | | <p>before the Scheme starts we have already put in place enhancements to the A2070 and Barrey Road by improving signage and visibility at the junction, and we will be reducing the speed limit to 40mph on Bad Munstereifel Road and re-routing traffic for right hand turns around the link road roundabout as part of the Scheme. Any subsequent amendment to this junction would require a Traffic Assessment of the Ashford Retail park and residential traffic impact to be initiated by the local network authority at the request of local stakeholders, which is not part of the Scheme as Highways England Major Projects deals with Nationally Significant Infrastructure (NSIP) Construction. Furthermore after a meeting on 30 November 2016 with Local Authorities and local businesses further discussions between Highways England Area 4 Spatial Planning and Kent County Council were planned, and they are currently on-going, to resolve any existing traffic issue ahead of the Scheme, which is supporting the discussion by providing the relevant</p> | |
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| | | data and additional traffic surveys. | |
| 002.18 | Pilgrims Hospice | | |
| 002.18a | <p>The Pilgrims Hospice is a particularly sensitive site where the peace and tranquillity of residents is of great importance. There is concern about the impact of works at the front of the site on this environment including the use of compounds nearby whose position needs to be clarified.</p> | <p>There is the potential of a small site compound to be located opposite 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 Scheme's focus is on respecting the community. Highways England is committed to meeting with the Hospice representative to talk through proposals. Noise impacts on the Pilgrim's Hospice were assessed in Chapter 11; Noise and Vibration, Volume 6.1 of the Environmental Statement. This assessment concluded that 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</p> | <p>Noted. The impacts from the scheme on the pilgrims Hospice should be kept to a minimum including locating compounds away from the site as far as possible.</p> |

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| | | M20 junction 10a eastbound off-slip. Council's interactive website map did not show any trees within the boundaries of the Scheme when used at the time of compiling. However now the Tree Preservation Orders (TPO) trees at Pilgrims house are identified the design has been altered and no trees within Pilgrim house land will be effected. A site visit to ascertain the full arboricultural impact on woodland W1 on 15th November can also be used to review RPAs of trees bordering Pilgrim house land to make assurances of this. | |
| 002.19 | Highways | | |
| 002.19a | Ashford Borough Council will rely on comments made by Kent County Council on this matter. | Noted. | Noted. |
| 002.20 | Draft Development Consent Order | | |
| 002.20a | Part 2 section 8 - Limits of deviation. The full implications of this need to be considered and are these limits of deviation covered in the current environmental statement. It is not clear what is a materially new or material worse environmental effect from those reported in the Environmental statement | Yes, limits of deviation are fully covered in Environmental Statement. | Noted |
| 002.20b | Given the short time period for | Noted. | ABC submitted the comments at Annex |

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| | considering the application documents the Council has not fully assessed the wording of the draft development consent order. The Council may wish to submit written comments on the draft development consent order. | | 2 to it's written representations on 16 January 2017 |
| 002.21 | Further details required | | |
| 002.21a | The two footway and cycleway bridges | Required documents have been sent to ABC by Highways England. This is a DCO submission requirement to provide Engineering Sections | Noted |
| 002.21b | The retaining walls/structures and extent of them shown along M20 corridors and A2070 which should be aesthetically finished | | |
| 002.21c | The precise area and working of the compounds as they are shown indicatively | | |
| 002.21d | More user friendly sections through the development showing existing and proposed changes. The engineering sections provided are not user friendly to a lay person and it is not clear what the proposed changes in levels are. | | |
| 002.22 | Conclusion | | |
| 002.22a | The Council is supportive of the proposed new junction and the positive contribution towards the growth agenda of the borough. ABC will continue to work with | | ABC comments are repeated |

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| | Highways England and Kent County Council on this application to deal with the issues identified and welcomes the opportunity to comment in more detail at a later stage | | |
| RR-016 | Relevant representation from Gowling WLG LLP on behalf of Friends Life Limited/Aviva Investments | | |
| 016.08 | 4/16/c This plot is the land upon which the Interested Party is required under its section 106 agreement to provide a turning circle to enable vehicles to exit Highfield Lane. This is a legal obligation on the Interested Party which it would not be able to comply with if this plot were taken | | <p>Friends Life had not made ABC aware of this issue with plot 4/16/c. Friends Life is required to enter into a planning obligation to</p> <ol style="list-style-type: none"> 1) pay KCC to carry out the works for a turning circle and 2) to ensure that land is transfer to KCC so that KCC can carry out those works. <p>ABC (and KCC) needs clarification that land required for the turning circle for the Stour Park development will not be impacted by this development, as the DCO will override planning permission and Friends Life or any successor in title would not be able to comply with the above planning obligation to deliver the turning circle</p> <p>It would appear that land within plot 4/11/b and 4/1/e are also required for the turning circle works for the Stour</p> |

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| | | | Park development. |
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