

# M20 Junction 10a

## TR010006

### Statement of Common Ground between (1) Highways England and (2) Ashford Borough Council - Local Authority

**DRAFT**





M20 Junction 10a

TR010006

**Statement of Common Ground  
between (1) Highways England and  
(2) Ashford Borough Council  
- Local Authority**

Volume 8.1



# Issue and revision record

Revision	Date	Originator	Checker	Approver	Description
A	January 2017	Mott MacDonald Sweco	Mott MacDonald Sweco	Highways England	DCO submission (deadline 3)
B	May 2017	Mott MacDonald Sweco	Mott MacDonald Sweco Burgess Salmon	Highways England	DCO submission (deadline 7)



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

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

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



# Content

Chapter	Title	Page
	Issue and revision record	5
	Content	7
1.	Introduction	8
1.1	Purpose of Statement of Common Ground _____	8
1.2	Parties to this Statement of Common Ground _____	8
1.3	Terminology _____	8
2.	Overview of Engagement	9
3.	Issues	12
3.1	Issues not related to the Environmental Statement _____	12
3.2	Environmental Statement related issues _____	33
4.	Agreement on this Statement of Common Ground	59



# 1. Introduction

## 1.1 Purpose of Statement of Common Ground

1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the proposed M20 junction 10a Scheme. Guidance on the purpose and possible content of SoCGs is given in paragraphs 58 – 65 of the Department for Communities and Local Government's "Planning Act 2008: Guidance for the examination of applications for development consent" (March 2015). Details of the Scheme are provided in Chapter 1 and Chapter 2 of the Environmental Statement (Volume 6.1) that accompanied the DCO application.

## 1.2 Parties to this Statement of Common Ground

1.2.1 This SoCG has been prepared in respect of the Scheme by (1) Highways England, as the Applicant, and (2) Ashford Borough Council.

1.2.2 Ashford Borough Council is a host local authority and a statutory consultee for the Scheme.

## 1.3 Terminology

1.3.1 Throughout this SoCG the phrase "It is agreed..." is used as a precursor to any point of agreement that has been specifically stated to be agreed between (1) Highways England and (2) Ashford Borough Council. The phrase "It is not agreed..." is used as a precursor to any point that (1) Highways England and (2) Ashford Borough Council have not yet agreed.

## 2. Overview of Engagement

2.1.1 A summary of the meetings and correspondence undertaken pre-application and pre-examination between (1) Highways England and (2) Ashford Borough Council in relation to the Scheme is outlined in Table 2.1 and Table 2.2 respectively.

Table 2.1 Pre-application: Engagement Activities between Highways England and Ashford Borough Council

Date Consulted	Form of Contact	Key issues raised / outcomes
21 December 2015	Email from Ashford Borough Council (ABC) to Mott MacDonald Sweco Join Venture (MMSJV)	<b>Air Quality Monitoring data</b> Email requesting Air Quality monitoring data
4 January 2016	Email from MMSJV to ABC	<b>Air Quality Monitoring data</b> Email providing Air Quality monitoring data
20 January 2015	Email from MMSJV to The Planning Inspectorate	<b>Environmental Impact Assessment Scoping Report</b> Environmental Impact Assessment Scoping Report was issued to the Planning Inspectorate who then issued to statutory environmental bodies and other relevant consultees for the collation of a Scoping Opinion.
18 February 2015 and included in the Scoping Opinion	Letter from ABC to The Planning Inspectorate	<b>Scoping Opinion</b> Key issues and responses included in DCO Document 6.3, Appendix 4.2 Response to Scoping Opinion. Comments were made with respect to Air Quality, Cultural Heritage, Landscape, Noise and Vibration, Road Drainage and the Water Environment.
17 February 2015	Meeting between ABC (Martin Kempshall) and MMSJV	<b>Meeting</b> Explanation of Scheme history and proposed design. Discussion of principals of the drainage design, and the environmental assessment work that will be carried out.
6 March 2015	Email from MMSJV to ABC	<b>Landscape and Visual Impact Assessment</b> Explanation of proposed visual receptor locations was given. No further viewpoints were suggested in response to this correspondence, with MMSJV directed to the 2015 Scoping Opinion, which has been taken into account
28 October 2015	Email MMSJV to ABC.	<b>Preliminary Environmental Information Report</b> Preliminary Environmental Information Report issued for review.
10 November 2015	Email from ABC to MMSJV	Requesting further information.
8 January 2016	Section 42 consultation letter from Highways England to ABC.	Letter from Highways England consulting consultees and stakeholders about the proposed application.

Date Consulted	Form of Contact	Key issues raised / outcomes
16 March 2016	Letter from ABC to Highways England.	<p><b>Written response to the Public Consultation</b></p> <p>Comments received in response to the consultation materials. ABC noted that there was a lack of detailed plans and information to enable a detailed assessment of the scheme's environmental and social impacts and to consider the acceptability of the mitigation measures.</p>
21 March 2016.	Meeting with Ashford Borough Council (Mark Davies and Environmental Health Officer)	<p><b>Environmental Health</b></p> <p>A meeting with the Head of Planning and the Environmental Health Officer to provide an update on the Main and Alternative Schemes and an overview of the emerging Air Quality and Noise and Vibration Assessments (methodology and potential effects).</p>
30 March 2016 to 17 May 2016	Emails between MMSJV to ABC.	<p><b>Cumulative Effects</b></p> <p>A list of proposed developments for inclusion within the Combined and Cumulative Effects chapter of Environmental Statement were issued to ABC with a request for any additional information, for example construction phasing, planning application status and any other developments that meet the criteria outlined. Information subsequently provided</p>
9 May 2016	Meeting with Ashford Borough Council and Kent County Council	<p><b>Emerging Environmental Statement Workshop</b></p> <p>A meeting to discuss the emerging ES including any key mitigation and or issues. A number of actions were taken forward including the incorporation of a Minerals Assessment into Chapter 9 Geology and Soils, Volume 6.1 and an additional drainage sensitivity test to consider attenuation with an increased (+40%) event to assess exceedance flow paths for the new attenuation ponds.</p>
10 May 2016	Email from ABC to MMSJV.	<p><b>Air Quality</b></p> <p>Request that Air Quality information relating to the proposed M20 Junction 10A is provided to ABC as DEFRA has specifically requested that the impacts from the scheme are discussed in Ashford Borough Council's Annual Status Report.</p>
11 July 2016	Telephone conversation between MMSJV to ABC.	<p><b>Air Quality</b></p> <p>Air quality information on the M20 Junction 10a Scheme was not available in time for inclusion in ABC's Annual Status Report as the final draft of the assessment was not complete. MMSJV called to update the Environmental Health Officer (EHO) and also to inform the EHO in advance of the DCO Application that a pre-existing area had been identified as exceeding air quality objectives on which the impact of introduction of the M20 Junction 10a Scheme is imperceptible. The plan to undertake additional monitoring as a result was also discussed.</p>
18 July 2016	Email from MMSJV to ABC and KCC	<p><b>Emerging Environmental Statement Workshop</b></p> <p>Minutes of Emerging ES workshop issued together with the Environmental Masterplan and cross Sections, Flood Risk</p>

Date Consulted	Form of Contact	Key issues raised / outcomes
		Assessment, Water Framework Assessment and Arboriculture Survey Report.

Table 2.2 Pre-examination: Engagement Activities between Highways England and Ashford Borough Council

Date Consulted	Form of Contact	Key issues raised / outcomes
22 August 2016	Meeting between MMSJV with ABC	Open Space and Statement of Common Ground meeting.
15 November 2016	Meeting between MMSJV with ABC	Open Space and Statement of Common Ground meeting.

- 2.1.2 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) Highways England and (2) Ashford Borough Council in relation to the issues addressed in this SoCG.

# 3. Issues

## 3.1 Issues not related to the Environmental Statement

### Need for the Scheme

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.1.1	Need for the Scheme	The Scheme is being promoted as a key transport requirement to help facilitate national, regional and local travel and regeneration and growth in support of future development south of Ashford. The Scheme is essential to the future development of South Ashford as the existing J10 will suffer from further congestion and long delays in the future if additional capacity is not provided. The DfT expects that national traffic growth will be particularly strong on the Strategic Road Network (of which the M20 is part) with an increase of between 29% and 60% between 2010 and 2040. Due in particular to the link that the M20 provides between Folkestone and the Channel Tunnel and the M26, M25 and rest of the country, the Scheme is an essential improvement to satisfy forecast traffic growth and to accommodate the level of housing and	<p>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.</p> <p>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</p>	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
		<p>employment growth that is forecast in the Ashford area. There is therefore a compelling need for the Scheme.</p>	<p>be unable to be fully built out unless a new 'Junction 10a' could be provided.</p> <p>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 &amp; 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.</p> <p>On 9 June 2016 the Council approved a consultation version of the emerging Local Plan to 2030. The relies on the delivery of Junction 10a to an even greater degree as it will be fundamental to the council's ability to demonstrate the deliverability of key proposed site allocations for housing and employment development. Without this ability, the new Local Plan would be expected to be found unsound, or otherwise far less suitable sites elsewhere</p>	

Reference	Issue	Highways England position	Ashford Borough Council position	Status
			in the borough would be required to be allocated instead.	

## Policy

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.1.2	Policy	<p>The Scheme is in accordance with the National Networks NPS.</p> <p>Highways England are aware that issues have been raised by ABC to ensure that the scheme avoids and mitigates environmental and social impacts. These issues are detailed and discussed in this Statement of Common Ground.</p>	<p>General principle and need is accepted.</p> <p>There are some detailed matters in the application that need to be addressed.</p>	Not agreed
	Policy	The Scheme is in accordance with the ABC planning policy.	The need for the scheme is accepted in ABC's adopted planning policy	Agreed
	Policy	The need for the Scheme is in accordance with the ABC transport policies CS15 of the adopted Core Strategy, ABC's supplementary planning guidance SPG6 and LTP3 Local Transport Plan 3 for Kent 2011-16	Agreed	Agreed
	Policy	The Case for the Scheme (application document ref. 7.1) provides an accurate summary of the policies pertinent to the DCO application.	The Local Impact Report submitted by ABC and KCC provides a full list of the relevant policies	Agreed

## Highways Design

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.1.3	Local and National highway design standards	<p>The Strategic Road Network (SRN) has been designed in accordance with the Design Manual for Roads and Bridges (DMRB). The local road network has been designed in accordance with the DMRB including consideration of Kent County Council's local requirements.</p> <p>Requested drawings have been issued to ABC by Highways England.</p>	<p>Need to see bridge designs and anything else that may not have been shown</p> <p>Ashford Borough Council will rely on comments made by Kent County Council on this matter.</p>	Deferred to KCC

Impact on public open space area in connection with works to Church Lane Footbridge

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.1.4	Impact on public open space area in connection with works to Church Lane Footbridge	<p>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 areas immediately adjacent to the existing footbridge and access ramps.</p> <p>The areas of the land designated as a Local Nature Reserve (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.</p>	<p>Ashford Borough Council had objected to the proposals in their original form as it (i) impacts on existing public open space and play area and that (ii) acceptable mitigation measures have not been provided for the loss of POS</p> <p>ABC can confirm its current position as follows on the two outstanding matters;</p> <p><u>(i) Impact on existing public open space and play area</u></p> <p>Highways England have produced a further plan HA514442-MMGJV-GEN-000-SK-HE00054 D on 26 April 2017 showing no inspection chambers or lighting columns in the children's play area and a 2.6m gap between the existing play area and the new footbridge ramp works.</p> <p>The drawing suggests that the gap between the existing play area and fence and works is actually 2.4m at it's narrowest. However, on the basis that these plans are</p>	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
			<p>accurate and the statement from Highways England, ABC is satisfied that the existing play area is not affected by the proposals. There will be unhindered level access of at least 2m width provided into the site from Church Road. The objection outlined in paragraph 2.6 of ABC's Written Representation has been overcome subject to these requirements being implemented.</p>	
			<p><u>(ii) Acceptable mitigation measures have not been provided for the loss of POS</u></p> <p>Discussions are ongoing between ABC and HE in relation to the open space and replacement land and agreement in principle has been reached on the terms for an agreement to be entered into between the parties in this regard.</p>	Under discussion

## Stour Park scheme and relationship with Alternative Scheme

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.1.9	Stour Park	Noted	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. Planning permission & s106 agreement have not been issued.	Agreed
3.1.10	Stour Park	Noted	The illustrative masterplan 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.	Agreed
3.1.11	Stour Park	Noted	The indicative masterplan of the Stour park development identifies that the northern boundary to the site would have a screen planting belt fronting towards the Junction 10a A2070 link road.	Agreed
3.1.12	Stour Park	Noted	The planting for the Stour Park development would be supplemented by tree planting	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
			through the Junction 10a scheme. If the quantum of land needed by Highways England for the link road corridor is reduced by adjustments to its boundary with Stour Park northwards then the space available for tree landscaping entirely within Stour Park would be enhanced as a consequence.	
3.1.13	Landscaping proposals	Mitigation for landscape and visual impacts has been incorporated into the Environmental Masterplan proposals (Figure 2.6f, Volume 6.2 of the Environmental Statement). Mitigation for noise impacts will be provided through the use of thin surface course (low noise) surfacing and noise bunds/barriers (Chapter 11, Paragraph 11.7.2, Volume 6.1 of the Environmental Statement). 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 development area.	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.	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.1.14	Lighting design	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; 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 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.	Agreed
3.1.15	Lighting design	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; 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.	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 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	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
			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.	

### Barrey Road

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.1.16	Land – plot 3/14/d	As part of the scheme proposals, Barrey Road junction is to be altered. The proposal allows for an additional dedicated left turn lane from the A2070. Part of the land needed for this is owned by Ashford Borough Council and Highways England needs to permanently acquire 300.45 square	Agreed	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
		metres of the land forming part of Barrey Road and the adjoining verge.		
	Land – plot 3/14/c	As part of the scheme Highways England requires temporary possession and use of 1133.28 square metres of land forming part of Barrey Road.	Agreed	Agreed
3.1.17	Barrey Road Junction	<p>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.</p> <p>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 before the M20J10a 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.</p>	<p>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.</p> <p>It is agreed the issue of congestion around Barrey Road lies outside this NSIP scheme and all parties are actively seeking a solution. KCC therefore seeks HE's commitment for appropriate improvement if and when required, as part of the road operation service on its Strategic Road Network.</p> <p>KCC is not aware that this commitment has been formally signed up to by HE Area 4 and needs to include that all parties seek funding and construction</p>	Agreed subject to commitment being formally signed up to by HE.

Reference	Issue	Highways England position	Ashford Borough Council position	Status
		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 M20J10a scheme as Highways England Major Projects deals with Nationally Significant Infrastructure (NSIP) projects.	solutions – this cannot be KCC's sole responsibility.	

### Highfield Lane

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.1.18	Stopping off Kingsford Street / Highfield Lane Junction and providing the turning circle.	Highways England considers this request to be outside of the schemes scope. There is no justification from traffic modelling to justify this incorporation in the scheme. Highways England have been informed by Stour Park developers that this work has been included in their section 106 agreement with Ashford Borough Council. Highways England will work closely with Stour Park Developers and KCC to facilitate the turning circle.	It should be explored if a closure of the vehicular link between Kingsford Street and Highfield Lane needs to be provided as part of these proposals for Junction10a to prevent unreasonable levels of rat-running through Mersham village.  There is a potential issue that traffic could divert along Kingsford Street through to Mersham in order to access the A20, affecting local journey times. KCC and local concern from businesses and residents regarding rat running and HGV	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
			<p>traffic using an unsuitable route to bypass J10a when there are issues on the strategic network.</p> <p>KCC is proposing to close Highfield Lane to vehicular traffic just south of the Highfield Lane / Kingsford Street junction. A pedestrian / cycle route will be maintained through the provision of bollards. The developers of Stour Park have agreed to fund the provision of a turning circle on land that they own to the east of Highfield Lane so that large vehicles can turn around in a safe manner. Subject to planning permission for the Stour Park site being granted and the developer transferring the land that KCC require for the turning circle within 8 weeks of the grant of the planning permission , KCC intends to carry out the turning circle works in the summer of 2017, before any works commence on the Junction 10a scheme. The turning circle works will take approximately 8-10 weeks to construct. If KCC cannot complete the turning circle works by 5 February 2018, KCC will carry out the turning circle works after the project permitted by the DCO is completed.</p>	

Reference	Issue	Highways England position	Ashford Borough Council position	Status
			<p>HE and KCC have agreed to enter into an agreement confirming that:</p> <ol style="list-style-type: none"> <li>1. HE will not obstruct or prevent the delivery of the turning circle.</li> <li>2. KCC will vacate the turning circle land by no later than 5 February 2018 in the event works to construct the turning circle are ongoing when HE enter the land.</li> <li>3. KCC will not commence the turning circle works any later than 13 November 2017 and following this date will not carry out the turning circle works until the project permitted by the DCO is completed and HE has vacated the land.</li> </ol> <p>KCC have requested a copy of the revised J10a construction programme and a deadline for when the turning circle must be installed. It is assumed that HE will not place restrictions on KCC completing the turning circle.</p>	

## Funding Statement

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.1.20	Funding Statement	Noted - document to be amended.	Paragraph 3.1.9 of the Funding Statement (DCO Document 4.2) states " <i>The contribution from local developer is reliant on a grant funding agreement between the Homes and Communities Agency (HCA) and Ashford Borough Council...</i> ". 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	Agreed

## Further details required

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.1.21	Additional details required by ABC	Required document has been provided to ABC by Highways England.  This is a DCO submission requirement to provide Engineering Sections.	The two footway and cycleway bridges.  The retaining walls/structures and extent of them shown along M20 corridors and A2070 which should be aesthetically finished.  The precise area and working of the compounds as they are shown indicatively.	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
			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.	

### Traffic and Transport

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.1.22	Congestion	The Scheme would address the significant congestion predicted by 2033, in particular along the A2070 to the south of M20 J10 in the PM peak in the absence of improvements.	ABC liaising with KCC	Deferred to KCC
	Access to Ashford	The Scheme will provide a new route for traffic into Ashford by way of the new junction and dual carriageway link road.	Agreed	Agreed
	Separation of traffic and journey time reliability on the Strategic Road Network.	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 in line with the predicted growth. The Scheme will not, however, impact greatly on journey		Deferred to KCC

Reference	Issue	Highways England position	Ashford Borough Council position	Status
		time reliability for through traffic on the M20.		
	Journey time reliability to William Harvey Hospital	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.	Agreed	Agreed
	Reduction in rat running	Highways England considers this request to be outside of the schemes scope. There is no justification from traffic modelling to justify this incorporation in the scheme. Highways England have been informed by Stour Park developers that this work has been included in their section 106 agreement with Ashford Borough Council. Highways England will work closely with Stour Park Developers and KCC to facilitate the turning circle.	<p>This creates the issue that traffic could divert along Kingsford Street through to Mersham in order to access the A20. ABC and Local concern regarding rat running and HGV traffic using an unsuitable route to bypass J10a when there are issues on the strategic network</p> <p>This needs to be looked at and if severance of Kingsford Street at its junction with Highfield Lane and a turning head constructed is required as part of this scheme</p> <p>There is a potential issue that traffic could divert along Kingsford Street through to Mersham in order to access the A20, affecting local journey times. KCC and local concern from businesses and residents regarding rat running and HGV traffic using an unsuitable route</p>	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
			<p>to bypass J10a when there are issues on the strategic network.</p> <p>KCC is proposing to close Highfield Lane to vehicular traffic just south of the Highfield Lane / Kingsford Street junction. A pedestrian / cycle route will be maintained through the provision of bollards. The developers of Stour Park have agreed to fund the provision of a turning circle on land that they own to the east of Highfield Lane so that large vehicles can turn around in a safe manner. Subject to planning permission for the Stour Park site being granted and the developer transferring the land that KCC require for the turning circle within 8 weeks of the grant of the planning permission , KCC intends to carry out the turning circle works in the summer of 2017, before any works commence on the Junction 10a scheme. The turning circle works will take approximately 8-10 weeks to construct. If KCC cannot complete the turning circle works by 5 February 2018, KCC will carry out the turning circle works after the project permitted by the DCO is completed.</p>	

Reference	Issue	Highways England position	Ashford Borough Council position	Status
			<p>HE and KCC have agreed to enter into an agreement confirming that:</p> <ol style="list-style-type: none"> <li>1. HE will not obstruct or prevent the delivery of the turning circle.</li> <li>2. KCC will vacate the turning circle land by no later than 5 February 2018 in the event works to construct the turning circle are ongoing when HE enter the land.</li> <li>3. KCC will not commence the turning circle works any later than 13 November 2017 and following this date will not carry out the turning circle works until the project permitted by the DCO is completed and HE has vacated the land.</li> </ol> <p>KCC have requested a copy of the revised J10a construction programme and a deadline for when the turning circle must be installed. It is assumed that HE will not place restrictions on KCC completing the turning circle.</p>	
			Defer to KCC	Deferred to KCC

Reference	Issue	Highways England position	Ashford Borough Council position	Status
	Safety	The Scheme will also provide a safer network. The introduction of 40mph speed limits on the link road, clearer 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 as a result.		

### Draft Development Consent Order

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.1.24	Requirements (Schedule 2)	The Requirements contained in Schedule 2 of the draft DCO are agreed between Highways England and the Borough Council.	See ABC's comments on the DCO as part of the written representations.	Under discussion
3.1.25	Limits of deviation	Limits of deviation are stated within the Limitations and Assumptions sections of Chapters 5 to 14, Volume 6.1.	.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.	Under discussion
	Limits of deviation	Limits of deviation are covered in ES as above and details materially new and worse effect.	It is not clear what is a materially new or material worse environmental effect from those reported in the Environmental statement. Also see ABC's comments on the DCO in written representations	Under discussion

## Social Economic

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.1.27	Socio-economic	The Appendix 13.1 Land use and Economic Development Report of the Chapter 13 of the Environmental Statement (Volumes 6.1, 6.2 and 6.3) assesses the social and economic impacts of the Scheme.	Agreed  ABC has not carried out a detailed assessment of the Socio-economic case. See ABC's LIR ABC agrees that a social and economic case has been produced.	Agreed

### 3.2 Environmental Statement related issues

#### Chapter 5: Air Quality

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.2.1	Air quality general	An Air Quality assessment has been undertaken ((Chapter 5; Air Quality contained in Volume 6.1 of the Environmental Statement). 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>ABCs relevant representation 3 October confirmed/ further clarification /information needed so cannot give a general agreement</p> <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. Highways England have provided enough evidence that significant effects during construction are not likely. They have also referred to updated construction plans, which would maintain 2-way flow on the A20 during most of the construction phase. This updated plan did not form part of the ES, but is certainly to be welcomed for AQ.</p>	<p>Under discussion</p> <p>Highways England's air quality specialist has been in discussion with Alaric Lester of Temple Group, acting on behalf of ABC. This discussion in ongoing and Statement of Common Ground will be updated in due course to reflect the results of the discussion.</p>
	Air quality during construction period	The proposed construction traffic management is likely to result in	Further information as to whether there is the potential for	See above.

Reference	Issue	Highways England position	Ashford Borough Council position	Status
		<p>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 air quality effects will be temporary and reversible and therefore are not significant</p>	<p>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>	
3.2.1	<p>Air quality during the construction period, specifically, whether temporary changes associated with traffic lights in the A20 or changes in speeds on the M20 would be significant.</p>	<p>The effects of construction along the A20 and the M20 have been assessed to be not significant, this is based on the discussions below:</p> <p>The baseline along the A20 was determined through a Scheme specific monitoring survey. Monitored concentrations of nitrogen dioxide (NO<sub>2</sub>) have been distance adjusted to the nearest sensitive receptors using the Defra NO<sub>2</sub> distance calculator. The annual mean NO<sub>2</sub> concentrations at the nearest sensitive receptors, which are approximately 15 metres from A20 in the locality of the proposed traffic management, are 27.4µg/m<sup>3</sup> and therefore well below the annual mean NO<sub>2</sub> objective of 40µg/m<sup>3</sup>. It should be noted that the Hospice is located more than 40 metres from the road and therefore</p>	<p>Given that annual mean concentrations are below 30 µg/m<sup>3</sup>, it is accepted that significant effects during construction are unlikely on the A20 over a period of seven months.</p> <p>The temporary traffic management would lead to increases in pollution levels if in place for seven months. Therefore, revisions to the construction plans to maintain two-way flow on the A20 for the majority of the construction phase are welcomed on air quality grounds.</p> <p>It is agreed that a 50mph restriction on the M20 could lead</p>	

Reference	Issue	Highways England position	Ashford Borough Council position	Status
		<p>concentrations will be considerably lower than these.</p> <p>The latest construction plans are being developed by the contractor and it is now planned that the two-way flow on the A20 will be maintained for the majority of the construction phase. There will still be periods where traffic management will be required but this is only likely to last for periods of up to 7 days. Based on the revised construction plans and the current baseline, there will be no significant effects on air quality.</p> <p>However, in the Environmental Statement, it was proposed that the temporary traffic management along the A20 will be in place for approximately 7 months. Therefore, to further demonstrate that these proposals will not lead to significant effects, changes to NO<sub>2</sub> concentrations have been calculated using the DMRB Screening Tool V4.2. This incorporates speed band emissions in accordance with IAN 185/15. Currently, a combined two-way flow of approximately 14,500 vehicles per day (AADT) use the A20. When conservatively assuming all the traffic has its speed reduced to 'heavy congestion' from 'high speed', resultant annual mean NO<sub>2</sub> concentrations remain below the air</p>	<p>to small reductions in air pollution.</p>	

Reference	Issue	Highways England position	Ashford Borough Council position	Status
		<p>quality objectives and are therefore not significant.</p> <p>When considering the impacts of the traffic management on short term (one hour) objectives, the annual mean concentrations are used as a proxy in accordance with Defra's Local Air Quality Management Technical Guidance 2016 (TG16). This guidance advises that exceedances of the one hour mean objective for NO<sub>2</sub> are only likely to occur where annual mean concentrations are 60µg/m<sup>3</sup> or above. When considering the distance of the nearest sensitive receptors where members of the public might reasonably be expected to spend one hour or longer, the annual mean concentrations are predicted to be well below 60µg/m<sup>3</sup> and therefore the traffic management will not create exceedances of the one hour air quality objective.</p> <p>The proposed construction traffic management on the M20 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</p>		

Reference	Issue	Highways England position	Ashford Borough Council position	Status
		emissions which would benefit air quality.		
	Air quality	Information regarding modelled versus observed speeds was provided to ABC at Deadline 4.	Further information regarding modelled versus observed speeds that led to derivation of traffic speed data in Appendix 5.3.	See above.
	Air quality	This comment is not absolutely clear; however it is assumed the comment relates to the increase in concentration greater than 0.4µg/m <sup>3</sup> at receptor 1469 presented in DCO Document 6.3, Appendix 5.4, but not included in the assessment of significance in Chapter 5, Table 5.13, Volume 6.1 of the Environmental Statement. This receptor is located at the garden of the 'French Connection' 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 <sub>2</sub> concentration is well below 60µg/m <sup>3</sup> 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.	Clarification as to the apparent minor discrepancy between 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.	See above.

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.2.2	Outline Construction Environmental Management Plan	The Air Quality measures included in the Outline Construction Environmental Management Plan (DCO Document 6.3, Appendix 17.1) are appropriate and are agreed between Highways England and the Borough Council.	ABCs relevant representation 3 October confirmed further clarification /information needed so cannot give a general agreement.  The Air Quality measures included in the Outline Construction Environmental Management Plan are appropriate.	Agreed

## Chapter 6: Cultural Heritage

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.2.3	Cultural Heritage	The Cultural Heritage Chapter (Chapter 6) of the Environmental Statement and associated figures and technical appendices (Volumes 6.1, 6.2 and 6.3) properly assess the potential impacts of the Schemes on cultural heritage and the methodology used is appropriate.	Defer to specialists – Historic England and KCC to comment. We don't agree with the final mitigation detail at present	Deferred to KCC
3.2.4	Impact on Grade 1 listed St Mary's Church and adjoining listed Court Lodge complex	A Cultural Heritage Assessment has been undertaken (Chapter 6; Cultural Heritage, Volume 6.1 of the Environmental Statement) 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	The setting of the Grade 1 and adjoining Grade 2 Court Lodge complex is important. The comments from Historic England need to be considered and whether improvements can be provided such as less highway paraphernalia and	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
		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.	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.	
3.2.5	Outline Construction Environmental Management Plan	The Cultural Heritage measures included in the Outline Construction Environmental Management Plan (Appendix 17.1 contained in Volume 6.3 of the Environmental Statement) are appropriate and are agreed between Highways England and the Borough Council.	Defer to specialists Historic England and KCC to comment.	Deferred to KCC
3.2.6	Written Scheme of Investigation	Highways England has prepared a Written Scheme of Investigation, which will has been sent to KCC for approval by the County Archaeologist.	Waiting for this to happen	Under discussion

## Chapter 7: Landscape

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.2.7	Landscape	The Landscape Chapter (Chapter 7) of the Environmental Statement and associated figures and technical appendices (Volumes 6.1, 6.2 and 6.3) properly assess the potential impacts of the Schemes on landscape.	Some issues raised in ABC 's relevant representation 3 Oct.  Still maintain there are inadequacies in the LVIA assessment however we have sought to address concerns regarding effects through the optimisation of landscape mitigation. These matters were discussed at the meeting between the Applicant and ABC on 31 March 2017. Whilst we have reviewed and agreed the meeting minutes with the Applicant, we reserve our position as to whether our concerns have been adequately addressed until we have had a chance to review the revised Masterplan drawings and accompanying 'Statement of Design' which we understand are to be submitted by the Applicant as part of the Deadline 6 submissions.	Not agreed
	Landscape - methodology	The Landscape Chapter (Chapter 7) of the Environmental Statement and associated figures and technical appendices (Volumes 6.1, 6.2 and 6.3) has used the appropriate methodology.	As above.	As above.

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.2.13	Environmental Masterplan	The Arboriculture Survey Report and Arboriculture Implications Assessment (Appendix 7.1 and Appendix 7.3, Volume 6.3 of the Environmental Statement) properly address the potential impacts of the Scheme on trees	Some issues raised in ABC 's relevant representation 3 Oct Following meeting with the applicant on 31 March 2017 mitigation measures have been developed and improved. Whilst we have reviewed and agreed the meeting minutes with the Applicant, we reserve our position as to whether our concerns have been adequately addressed until we have had a chance to review the revised Masterplan drawings and accompanying 'Statement of Design' which we understand are to be submitted by the Applicant as part of the Deadline 6 submissions.	Agreed
3.2.14	Arboriculture - impacts of the Scheme on trees	The Arboriculture Survey Report and Arboriculture Implications Assessment (Appendix 7.1 and Appendix 7.3, Volume 6.3 of the Environmental Statement) properly address the potential impacts of the Scheme on trees. These have been updated to include trees with Tree Preservation Orders (TPOs) that were not previously identified.	Nothing further to add.	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
	Arboriculture - methodology	The Arboriculture Survey Report and Arboriculture Implications Assessment (Appendix 7.1 and Appendix 7.3, Volume 6.3 of the Environmental Statement) has used the appropriate methodology.	Nothing further to add.	Agreed
3.2.17	Arboricultural Survey Report	The Arboricultural Survey Report (Appendix 7.1, Volume 6.3 of the Environmental Statement) and the Arboriculture Implications Assessment (Appendix 7.3, Volume 6.3 of the Environmental Statement) state 36 groups of trees.	Arboricultural Survey Report Appendix 7.1  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.	Agreed
3.2.18	Arboricultural Survey Report Appendix 7.1	A copy of our arboriculturalist's CV and qualifications -must be supplied if required.	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.	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.2.19	Arboricultural Survey Report Appendix 7.1	The groups were assessed under section 4.4.2.3 and the note following 4.4.2.3 of BS5837:2012 which reads: "NOTE The term "group" is intended to identify trees that form cohesive arboricultural features either aerodynamically (e.g. trees that provide companion shelter), 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).	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	Agreed
3.2.20	Arboricultural Survey Report Appendix 7.1	A physical inspection of the trees indicted 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.	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.	Agreed
3.2.21	Arboricultural Survey Report Appendix 7.1	A full Latin species list will be added to the Arboricultural Survey Report (Appendix 7.1, Volume 6.3 of the Environmental Statement)	Page 24, Appendix B. Species list cross referencing common names with scientific/botanical names is missing from the report.(paragraph 1.5.6)	Agreed
3.2.22	Arboricultural Implications Report Appendix 7.3	Arboriculture Implications Assessment (Appendix 7.3, Volume 6.3 of the	Page 8, paragraph 2 of the Executive Summary states that	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
		Environmental Statement) references to be checked	the Arboricultural Implications Report should be read in conjunction with M20 Junction 10a Arboricultural Survey Report (June 2016) 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.	
3.2.23	Arboricultural Implications Report Appendix 7.3	The Arboricultural Survey Report (Appendix 7.1, Volume 6.3 of the Environmental Statement) and the Arboriculture Implications Assessment (Appendix 7.3, Volume 6.3 of the Environmental Statement) state 36 groups of trees.	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.	Agreed
3.2.24	Arboricultural Implications Report Appendix 7.3	Arboriculture Implications Assessment (Appendix 7.3, Volume 6.3 of the Environmental Statement) references to be checked	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.	Agreed
3.2.25	Arboricultural Implications Report Appendix 7.3	Generally RPA incursions should not occur on site as protective fencing should exclude	In Section 3 there is no reference to root incursion	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
		construction activity from these. However, if there is uncertainty in certain areas site specific Arboricultural Method Statements can be produced to highlight and further necessary mitigation	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 to undertake an assessment of root protection area incursions.	

## Chapter 8: Nature Conservation

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.2.27	Nature Conservation	The Nature Conservation Chapter (Chapter 8) of the Environmental Statement and associated figures and technical appendices (Volumes 6.1, 6.2 and 6.3) properly assess the potential impacts of the Scheme on nature conservation and the methodology used is appropriate.	Appropriate for specialist such as Natural England to comment. KCC ecology may have a view	Deferred to KCC
3.2.28	Outline Construction Environmental Management Plan	The Nature Conservation measures included in the Outline Construction Environmental Management Plan (Appendix 17.1, Volume 6.3 of the Environmental Statement) are appropriate and are agreed between Highways England and the Borough Council.	Appropriate for specialist such as Natural England to comment. KCC ecology may have a view	Deferred to KCC

## Chapter 9: Geology and Soils

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.2.29	Geology and Soils	The Geology and Soils Chapter (Chapter 9) of the Environmental Statement (Volumes 6.1) properly assesses the potential impacts of the Scheme on geology and soils and minerals and the methodology used is appropriate.	KCC and Environment Agency have made comments.	Deferred to KCC and Environmental Agency
3.2.30	Contaminated Land	The Contaminated Land Desk Study and Preliminary Interpretative Report (DCO document 7.4) properly assesses the baseline conditions for the Scheme and the methodology used is appropriate.	As above	Deferred to KCC and Environmental Agency
3.2.31	Outline Construction Environmental Management Plan	The geology and soils measures included in the Outline Construction Environmental Management Plan (Appendix 17.1, Volume 6.3 of the Environmental Statement) are appropriate and are agreed between Highways England and the Borough Council.	As above	Deferred to KCC and Environmental Agency

## Chapter 10: Materials

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.2.32	Materials	The Materials Chapter (Chapter 10) of the Environmental Statement (Volumes 6.1 and 6.3) properly assesses the potential impacts of the Scheme on materials.	Agreed	Deferred to KCC
	Materials - methodology	The Materials Chapter (Chapter 10) of the Environmental Statement (Volumes 6.1 and 6.3) has used the appropriate methodology.	Agreed	Agreed
3.2.33	Outline Construction Environmental Management Plan	The Materials measures included in the Outline Construction Environmental Management Plan (Appendix 17.1, Volume 6.3 of the Environmental Statement) are appropriate and agreed between Highways England and the Borough	Agreed	Agreed

## Chapter 11: Noise and Vibration

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.2.34	Noise	The Noise and Vibration Chapter (Chapter 11) of the Environmental Statement (Volumes 6.1, 6.2 and 6.3) properly assesses the potential impacts of the Scheme on noise	ABC's relevant representation 3 Oct raised issues that need clarification/ further information. Issues of impacts of mitigation raised.	Under discussion  Highways England's noise specialist has been in contact with ABC to discuss possible locations and timing of noise

Reference	Issue	Highways England position	Ashford Borough Council position	Status
				monitoring and a response from ABC is awaited.
	Vibration	The Noise and Vibration Chapter (Chapter 11) of the Environmental Statement (Volumes 6.1, 6.2 and 6.3) properly assesses the potential impacts of the Scheme on vibration.		As above See 3.2.35 below.
	Noise - methodology	The Noise and Vibration Chapter (Chapter 11) of the Environmental Statement (Volumes 6.1, 6.2 and 6.3) has used the appropriate methodology		As above See 3.2.35 below.
	Vibration - methodology	The Noise and Vibration Chapter (Chapter 11) of the Environmental Statement (Volumes 6.1, 6.2 and 6.3) has used the appropriate methodology.		As above See 3.2.35 below.
3.2.35	Noise and Vibration	<p>(i) Chapter 11, Section 11.2.14, Volume 6.1 of the Environmental Statement refers to local policy. Local policies are further discussed in Chapter 11, Section 2.9.8 Volume 6.1 of the Environmental Statement.</p> <p>(ii) Chapter 11; Noise and Vibration, Volume 6.1 of the Environmental Statement assesses the noise impact of the Main and Alternative Schemes. Noise calculations have been based on traffic forecasts and assumptions</p>	<p>The context of the ES is noted. Further clarification/information is required on the following matters outlined in Chapter 9 of the Environmental Statement:</p> <p>(i) Section 9.2 – there is no reference to any local planning policy in respect of noise and vibration as the NPPF would require.</p>	<p>As above</p> <p>(ii) Interim Advice Noise 185/15 says <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</i></p>

Reference	Issue	Highways England position	Ashford Borough Council position	Status
		<p>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.</p> <p>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>(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><i>approximately 3dB(A) during individual peak periods.</i></p> <p>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.”</p> <p>There is no recognition of this advice in the ES or any follow up information provided. i.e. there is no indication that the influence of relieving congestion on noise production has been considered; only that free flowing traffic speeds have been assessed as per the Interim guidance note.</p>

Reference	Issue	Highways England position	Ashford Borough Council position	Status
			reduced speed and therefore lower noise levels associated with congestion, is therefore recommended.	
3.2.37	Visual impact of 3m Noise barrier along Kingsford Street and A2070	A meeting was held between Highways England, ABC and Temple Group on the 31 <sup>st</sup> March 2017 to discuss the Environmental Masterplan, which has been subsequently updated and submitted to the Examination at Deadline 6. In order to make clear the changes to the Environmental Masterplan, a report summarising the changes since the original DCO application submission has also been submitted at Deadline 6 (DCO document 13.5).	The 3m 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.	Under discussion
3.2.38	Visual impact of 3m Noise barrier along Kingsford Street and A2070	A meeting was held between Highways England, ABC and Temple Group on the 31 <sup>st</sup> March 2017 to discuss the Environmental Masterplan, which has been subsequently updated and submitted to the Examination at Deadline 6. In order to make clear the changes to the Environmental Masterplan, a report summarising the changes since the original DCO application submission has also been submitted at Deadline 6 (DCO document 13.5).	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.	Under discussion
3.2.39	Visual impact of 3m Noise barrier along Kingsford Street and A2070	A meeting was held between Highways England, ABC and Temple	The start of the Kingsford Street footbridge on the Kingsford	Under discussion

Reference	Issue	Highways England position	Ashford Borough Council position	Status
		Group on the 31 <sup>st</sup> March 2017 to discuss the Environmental Masterplan, which has been subsequently updated and submitted to the Examination at Deadline 6. In order to make clear the changes to the Environmental Masterplan, a report summarising the changes since the original DCO application submission has also been submitted at Deadline 6 (DCO document 13.5).	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.  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.	
3.2.40	Visual impact of 3m Noise barrier along Kingsford Street and A2070	A meeting was held between Highways England, ABC and Temple Group on the 31 <sup>st</sup> March 2017 to discuss the Environmental Masterplan, which has been subsequently updated and submitted to the Examination at Deadline 6. In order to make clear the changes to the Environmental Masterplan, a report summarising the changes since the original DCO application submission has also been submitted at Deadline 6 (DCO document 13.5).	The barrier along the corner of Highfield Lane by the Junction 10a roundabout is exposed without any screening landscaping.	Under discussion
3.2.41	Visual impact of 3m Noise barrier along Kingsford Street and A2070	A meeting was held between Highways England, ABC and Temple Group on the 31 <sup>st</sup> March 2017 to discuss the Environmental Masterplan, which has been	The initial barrier along the southern side of the A2070 near the Junction 10a interchange is right up against the	Under discussion

Reference	Issue	Highways England position	Ashford Borough Council position	Status
		subsequently updated and submitted to the Examination at Deadline 6. In order to make clear the changes to the Environmental Masterplan, a report summarising the changes since the original DCO application submission has also been submitted at Deadline 6 (DCO document 13.5).	footway/cycleway without any screening landscaping.	
3.2.42	Visual impact of 3m Noise barrier along Kingsford Street and A2070	A meeting was held between Highways England, ABC and Temple Group on the 31 <sup>st</sup> March 2017 to discuss the Environmental Masterplan, which has been subsequently updated and submitted to the Examination at Deadline 6. In order to make clear the changes to the Environmental Masterplan, a report summarising the changes since the original DCO application submission has also been submitted at Deadline 6 (DCO document 13.5).	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.	Under discussion
3.2.43	Visual impact of 3m Noise barrier along Kingsford Street and A2070	A meeting was held between Highways England, ABC and Temple Group on the 31 <sup>st</sup> March 2017 to discuss the Environmental Masterplan, which has been subsequently updated and submitted to the Examination at Deadline 6. In order to make clear the changes to the Environmental Masterplan, a report summarising the changes since the original DCO application submission has also been submitted at Deadline 6 (DCO document 13.5).	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.	Under discussion

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.2.44	Outline Construction Environmental Management Plan	<p>The Noise and Vibration measures included in the Outline Construction Environmental Management Plan (Appendix 17.1 Volume 6.3 of the Environmental Statement) are appropriate and are agreed between Highways England and the Borough Council.</p> <p>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>The council would like to see a fairly standard approach in the first case i.e. common core hours for noisy suitable variation where appropriate to the circumstances.</p> <p>The council would like to use section 61 on prior approval application via the construction environmental management plan that could require this to be done. Whereby the contractor provides details to the council of what work they are going to undertake and describes what measures they will put in place to minimise the noise impacts. That usually includes controls on the hours that noisy operations take place. Typically Monday to Friday that is 0800hrs to 1800hrs. Then either 0800hrs or 0900hrs until 1300hrs on a Saturday. That would provide the core for the approach we would like to see. There may, however, be circumstances where variation from these core hours will be required, and it is well established that the contractor can apply for variation or a dispensation including the justification for the variation and details of any additional</p>	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
			<p>measures to minimise noise in order to achieve this.</p> <p>This approach is often done, quite close to the start of the work, post the phase we are in now, when there is much more detailed information for the programme of work and the methodology. That enables specific measures to be incorporated into the works programme and the methods,</p>	

#### Chapter 14: Road Drainage and the Water Environment

Reference	Issue	Highways England position	Ashford Borough Council position	Status
3.2.49	Road Drainage and Water Environment	The Road Drainage and Water Environment Chapter (Chapter 14) of the Environmental Statement (Volumes 6.1, 6.2 and 6.3) properly assesses the potential impacts of the Scheme.	No comments	Agreed
	Road Drainage and Water Environment	The Road Drainage and Water Environment Chapter (Chapter 14) of the Environmental Statement (Volumes 6.1, 6.2 and 6.3) has used the appropriate methodology.	With regards to the technical details then there are no objections to the runoff rate and methodologies being proposed.	Agreed.
3.2.50	Water Framework Directive Assessment	The Water Framework Directive Assessment (Appendix 14.1, Volume	No comments	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
		6.3) properly assesses the potential impacts of the Scheme.		
	Water Framework Directive Assessment	The Water Framework Directive Assessment (Appendix 14.1, Volume 6.3) has used the appropriate methodology.	No comments	Agreed
3.2.51	Flood Risk Assessment	The Flood Risk Assessment (Appendix 14.2, Volume 6.3 of the Environmental Statement) properly assesses the potential impacts of the Scheme.	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 Council's 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 scheme.	Agreed
3.2.52	Flood Risk Assessment	Error within Appendix 14.1 Flood Risk Assessment (FRA), Volume 6.3 of the Environmental Statement is noted.	The report refers to Ashford Borough Council as the Lead Local Flood Authority when it is actually Kent County Council.	Agreed
3.2.53	Flood Risk Assessment	The Flood Risk Assessment (Appendix 14.2, Volume 6.3 of the	With regards to the technical details then there are no	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
		Environmental Statement) has used the appropriate methodology.	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 Council's 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 scheme.	
3.2.54	Flood Risk Assessment	Noted	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	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
			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	
3.2.55	Road Drainage and Water Environment	<p>Maintenance work for the Main and Alternative Scheme will be managed by Highways England 'Area 4' team, which is operationally responsible for the Strategic Road Network.</p> <p>KCC will be responsible for the A20 maintenance, Kingsford Street and Barrey Road.</p>	Appropriate levels of treatment are considered to be in place before the water finally discharges into the Aylesford stream. 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	Agreed
3.2.56	Drainage Strategy	The Drainage Strategy has assessed the attenuation ponds properly.	Proposed attenuation ponds to accommodate the maximum water level for the 100 year (+30%) return period critical storm. An exceedance test has been conducted and the	Agreed

Reference	Issue	Highways England position	Ashford Borough Council position	Status
			<p>proposed attenuation ponds will accommodate +40% climate change.</p> <p>At the preliminary design stage attenuation ponds are located above the ground water table although results were highly variable and will require review during detailed design.</p>	
3.2.57	Outline Construction Environmental Management Plan	The Road Drainage and Water Environment measures included in the Outline Construction Environmental Management Plan (Appendix 17.1, Volume 6.3 of the Environmental Statement) are appropriate and are agreed between Highways England and the Borough Council.	Appropriate levels of treatment are considered to be in place before the water finally discharges into the Aylesford stream. 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.	Agreed

# 4. Agreement on this Statement of Common Ground

This Statement of Common Ground has been jointly prepared and agreed by:

**Name:** Salvatore Zappala

**Signature:** \_\_\_\_\_

**Position:** Project Manager

**On behalf of:** Highways England

**Date:** \_\_\_\_\_

**Name:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Position:** \_\_\_\_\_

**On behalf of:** Ashford Borough Council

**Date:** \_\_\_\_\_