

A19 Downhill Lane Junction Improvement

Scheme Number: TR010024

7.7 Applicants Responses to Relevant Representations

Rule 8(1)(c)(i)
Planning Act 2008
Infrastructure Planning (Examination Procedure)
Rules 2010

Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

A19 DOWNHILL LANE JUNCTION IMPROVEMENT

The A19 Downhill Lane Junction Development Consent Order 202[]

APPLICANTS RESPONSES TO RELEVANT REPRESENTATIONS

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		Extract from Relevant Representation	HE Response
R1	Edward Wylie [RR-001]	<p>Living on [Redacted] of Downhill Lane and the A184 I have a vested interest to understand what if any disruption the proposed works will have to both my wife and myself. Specifically road closures, increased traffic and how this will impact our access both to get in and out of our property at [Redacted].</p> <p><u>Mr Wylie raised a number of additional questions at the Open Floor Hearing on 13 August 2019 which we have reproduced here and answered in the HE Response column for his ease of reference:</u></p> <ul style="list-style-type: none"> • <i>Who are considered to the “Stakeholders” in relation to the project, as referenced in section 1.40 of 7.2 outline construction EMS?</i> • <i>Who is the dedicated Community Liaison Officer (CLO) referred to in Table 2 of 7.2 outline construction EMS? Would the CLO engage with West Boldon Residents’ Association?</i> • <i>How will the public be kept informed about the project? In particular with regards to road closures, traffic congestion, noise and bus services.</i> • <i>He was concerned with regards to the use of Downhill Lane by petrol tankers. If this was to continue, would a risk assessment be carried out?</i> 	<p>Highways England are committed to minimising disruption during the construction of the Scheme. The authorised development must be constructed in accordance with a Traffic Management Plan (TMP) which is to be submitted to and approved in writing by the Secretary of State, following consultation with the relevant planning authority. This is secured in Requirement 10 of the draft DCO (Application Document Reference: TR010024/APP/3.1(3)). A number of road closures will be required to carry out a limited number of specific activities such as the installation of new bridge beams over the A19. Closures will be limited to off-peak hours and a limited number of closures on weekends. The A19 and surrounding local road network will be open to traffic for the vast majority of the construction period.</p> <p>Access to this property will not be affected by the Scheme.</p> <p>Stakeholders are any person or organisation impacted by or with a vested interest in the project. This includes local residents in relation to the Construction Environmental Management Plan (CEMP) (Application Document Reference: TR010024/APP/7.2 / APP-051). The CEMP will consider the management of potential nuisance to residents such as noise, dust and disruption to access or use of the road network. Impacts from traffic management measures such as road closures will be considered in the Traffic Management Plan, including any temporary access arrangements and diversion routes. A Stakeholder Engagement Plan will also be developed to set out the ways in which stakeholders will be kept informed during the works.</p> <p>The outline CEMP submitted with the DCO application named a specific person as Costain’s Community Liaison Manager (CLM) in Table 1 of the CEMP. This was the person appointed as CLM for the Testo’s project at the time the application was made. However, a new CLM has since been appointed for Testo’s Stuart Culley, and it is expected that Stuart will also cover the Downhill Lane project in due course, although this may be subject to change. In any case, a suitably experienced CLM will be appointed for the Scheme. The CLM will engage with Boldon Residents’ Association and with other local groups in the same way as is being done on the Testo’s project.</p> <p>A similar approach to informing the public about the project will be adopted as is being used on the Testo’s project. This includes:</p> <ul style="list-style-type: none"> • Highways England project web page updates • Weekly traffic management updates including notice of any upcoming road closures • Project newsletters • Letter drops to residents as required • Meetings with local groups including West Boldon Residents’ Association <p>Downhill Lane is a local authority road and formal methods for preventing use by HGVs / petrol tankers is therefore limited and could only be enacted by the local highway authority.</p>
		<p>Additionally, should the project be sanctioned and work proceeds what in the opinion of the relevant agencies involved in the approval process would any resulting increased volume of traffic have on our property in regards to both damage as a result of foundation movement and then what impact would the work have if we wanted to sell the property during the construction period.</p>	<p>Highways England’s assessment of the impact of the Scheme on the traffic flows on Downhill Lane is contained within Paragraphs 2.10.12, 2.10.13 and Table 2-1 of the Environmental Statement (Application Document Reference: TR010024/APP/6.1 / APP-020). This shows that:</p> <ul style="list-style-type: none"> - Once operational – in terms of average daily traffic, the flow on Downhill Lane in this location would decrease marginally (by between 3% and 5%) upon the opening of the Scheme. This is because delays at Downhill Lane junction within the ‘Do Minimum’ network scenario (i.e. in the absence the Scheme) prevent traffic from Washington Road travelling north on the A19, and so drivers use Downhill Lane (East) to travel to Boldon. In the ‘Do Something’ network scenario (i.e. with the Scheme) this delay is removed, allowing this traffic to reassign onto the A19. - During construction – Highways England is maximising their use of the strategic road network and minimising impact on local roads. As regards the latter, Highways England would note that Downhill Lane will not be used for ‘traffic management’ i.e. as a diversion route, as it is unsuitable, and it is not proposed to be used for construction access from the north. <p>It should be noted that Downhill Lane is part of the local road network so its ongoing operation and maintenance is the responsibility of the local highway authority, not Highways England.</p>

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			Highways England cannot assess the marketability of individual properties during the construction period nor are they obliged to deal with compensation matters during the examination of the Scheme, however the Scheme is a significant investment to promote economic growth and prosperity both locally and in the region. Downhill Lane junction will be improved to provide better access to the strategic road network whilst reducing congestion and safer access for non-motorised users (see the Planning Statement (Application Document Reference: TR010024/APP/7.1 / APP-050) for further information on the benefits of the Scheme)..
R2	John Deighan [RR-002]	<p>We are am residents of Downhill Lane [Redacted] and use both the Testoes Roundabout junction and the junction of The A19 and Downhill on a daily basis. We would like to know the following:</p> <p>A) What are the start and concluding dates of the works at both junctions?</p>	<p>Subject to the decision of the Secretary of State, if consented, the Scheme construction period is planned to commence in December 2020 with the Scheme planned opening for traffic in May 2022. The Testo's scheme is in construction and proposed to be open for traffic in July 2021. Some works will continue after the schemes are open for traffic, such as seasonal planting in landscaping areas. The temporary construction areas will be reinstated and the site compounds removed as early as possible after Scheme completion.</p> <p>The combined delivery programme can be found in appendix B of the Interrelationship document submitted with the application for the Order (Application Document Reference: TR010020/APP/7.3 / AS-024).</p>
		<p>B) What is the likelihood of increased traffic on Downhill Lane during the period of road works?</p> <p>C) Will Downhill Lane be closed to through traffic at any time and if so when is this likely to happen and for how long a period?</p>	<p>Highways England are committed to minimising disruption during the construction of the Scheme. The authorised development must be constructed in accordance with a Traffic Management Plan (TMP) which is to be submitted to and approved in writing by the Secretary of State, following consultation with the relevant planning authority. This is secured in Requirement 10 of the draft DCO. A number of road closures will be required to carry out a limited number of specific activities such as the installation of new bridge beams over the A19. Closures will be limited to off-peak hours and a limited number of closures on weekends. The A19 and surrounding local road network will be open to traffic for the vast majority of the construction period.</p>
		<p>D) Downhill Lane is becoming a popular "Rat Run" now. During and on conclusion of the proposed works this may well increase traffic on this single carriageway b route. I appreciate that it is also a bus route. Can you consider making the section from A184 to the Downhill exit of the A19 a residents only exit and entry and making the section from the most Southerly residence to the A19 junction "bus only" route thus resulting in the termination of the current "Rat Run".</p>	<p>Highways England's assessments do not show any significant impact on existing traffic flows as a result of the Downhill Lane scheme.</p> <p>The ongoing operation and status of Downhill Lane is a matter for South Tyneside Council to consider on the basis it is part of the local road network, rather than the strategic road network operated by Highways England.</p>
		<p>E) The road surface on Downhill Lane is not good now. Are there arrangements to ensure it is not damaged further in the event of increased traffic over the "works" period. Finally, we are very concerned that Downhill Lane will be used as a route for traffic management during the The Testoes roadworks period thus making it even more difficult for residents and possibly endangering safety of road users and pedestrians on Downhill Lane itself.</p>	<p>The condition of the road surface is noted and will be recorded immediately prior to the start of the construction period. Any damage caused as a direct result of the Scheme will be rectified to the satisfaction of the relevant local authority.</p>
R3	IAMP LLP [RR-003]	<p>IAMP LLP is the promoter of the International Advanced Manufacturing Park("IAMP") in Sunderland and South Tyneside. IAMP lies immediately to the west of the A19, close to and accessible from Downhill Lane Junction (DLJ). The first part of IAMP, IAMP ONE, has planning permission and is under construction. The second part of IAMP, IAMP TWO, is a project of national significance and will be the subject of an application for a development consent order later in 2019. The relationship between IAMP and DLJ is outlined in Highways England's Application Document Reference 7.3: Inter-relationship with Testo's Junction, A1 Birtley to Coalhouse Scheme and International Advanced Manufacturing Park. We refer to that document as the "IRD". IAMP LLP intends to make submissions which:</p> <ol style="list-style-type: none"> convey its support for the principle of the A19 DLJ Improvement. expand on topics in the IRD to assist the Examining Authority by: (a) providing more detail on the interface between IAMP and the A19 DLJ Improvement; and (b) explaining the on going co-operation between IAMP LLP and Highways England to co-ordinate the delivery of their respective projects and mitigate impacts. comment on the draft development consent order for the A19 DLJ Improvement (and its relationship to the emerging DCO for IAMP TWO); and other application documents. 	<p>Highways England note the representation submitted by IAMP LLP and will continue to consult with their representatives to co-ordinate the delivery of the schemes to minimise disruption during construction and operation (please refer to the Interrelationship Document Order (Application Document Reference: TR010020/APP/7.3 / AS-024))</p> <p>A Statement of Common Ground between Highways England and IAMP LLP will be submitted in due course.</p>

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R4	YoungsRPS For Kandola [RR-004]	Dear Sirs, We act on behalf of Mr Kandola, who owns land to the north east of Downhill Lane Junction which has been identified for temporary use in connection with this scheme. As per information discussions, the proposal is for only part of our client's field to be occupied, leaving him with a small sliver of land to the [Redacted]. We request that the whole field is taken, rather than the part currently identified. Yours faithfully, Joanne Metcalfe	Highways England will continue to progress discussions with Mr Kandola to agree appropriate compensation. As noted above, the detail of any compensation and valuation is not dealt with during the examination of the Scheme. Should Mr Kandola's residual land adjacent to the Order land be assessed to be unsustainable for the period of temporary occupation, Highways England will compensate Mr Kandola for all losses in accordance with Land Compensation Manual. https://www.gov.uk/government/publications/the-land-compensation-manual .
R5	Hedley for TEFPP [RR-005]	Areas of agreement shall be provide ahead of the examination. Discussions with HE are ongoing and we understand shall be concluded shortly. Likewise areas of disagreement shall be set out where appropriate.	Highways England will continue to progress discussions with Town End Farm Partnership.
R6	Public Health England [RR-006]	Thank you for your consultation regarding the above development. Public Health England (PHE) welcomes the opportunity to comment on your proposals at this stage of the project and can confirm that:- The Environmental Statement (ES) has not identified any issues which could significantly affect public health. We have no additional comments to make at this stage and can confirm that we have chosen NOT to register an interest with the Planning Inspectorate on this occasion. Please do not hesitate to contact us if you have any questions or concerns.	Noted.
R7	NGET [RR-007]	RELEVANT REPRESENTATION Representation by National Grid Electricity Transmission Plc and National Grid Gas PLC to the A19 Downhill Lane Junction Improvement ("the Project"). National Grid Electricity Transmission Plc (NGET) is the owner and operator of the electricity transmission system in England and Wales. National Grid Gas Plc (NGG) is the licensed gas transporter under the Gas Act 1986, with a statutory responsibility to transport gas throughout the country. As responsible statutory undertakers, NGET and NGG's primary concerns are to meet their statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. NGET and NGG wish to confirm that they have reviewed the documentation and plans submitted for the Project. They have no apparatus within the proposed order limits. NGET does have an overhead line and tower in close proximity to the proposed order limits. - ZZA (400kV) overhead line route Hartlepool to West Boldon Circuit and Offerton to West Boldon Circuit - Tower ZZA089 Should it be necessary work close to this overhead line then it is essential that necessary enquiries about planned activities and work are submitted for approval to the National Grid Plant Protection team at: plantprotection@nationalgrid.com	Highways England refers to the joint statement submitted by both National Grid and Highways England. This confirms that there is no National Grid apparatus in the Scheme boundary, and there are no outstanding issues between the parties.
R8	Hellens [RR-008]	We object to the temporary land take on the basis that we are promoting the land for housing and the temporary land take will have a major impact on the early delivery of the site. We object to the permanent land take, specifically in relation to the configuration for the NMU and how this will work in conjunction with the IAMP proposals for a bridge across the A19 on to Washington Road. In addition the land take will have an adverse impact upon the developable area of the eastern parcel of land	<p>The extent of the land interests affected by the compulsory acquisition and temporary possession powers sought by Highways England is described in Chapter 4 of the Statement of Reasons (Application Document Reference TR010024/APP/4.1 / APP-015).</p> <p>Highways England have reviewed the relevant Local Plan and no housing is currently proposed within the Order land. The Planning Statement (Application Document Reference TR010024/APP/7.1 / APP-050) describes the planning policy context for the Scheme and reviews the planning issues it raises in light of the relevant National Policy Statements (NPS), the NNNPS and other relevant national and local planning policy. Highways England would note both South Tyneside Council and Sunderland City Council's local plans support the need for the Scheme in its proposed location.</p> <p>Highways England have submitted additional assessments (Application Document Reference TR010024/APP/6.11 / AS-022) which consider the environmental effects of delivering a non-motorised user (NMU) solution that is integrated with the IAMP TWO scheme, provided that scheme has been consented, and its proposed NMU facilities crossing the A19 and connecting to A1290 (the "integrated NMU solution") have been constructed and are open to the public. The legal mechanism by which the integrated NMU solution would be delivered is now contained in the amended draft Development Consent Order (Application Document Reference TR010024/APP/3.1(3)) and accompanying Explanatory Memorandum (Application Document Reference TR010024/APP/3.2(3)).</p>
R9	Environment Agency [RR-009]	These Relevant Representations contain an overview of the project issues which fall within our remit, which in this case relate to water quality, flood risk, groundwater contaminated land, pollution prevention and Environmental Permitting. They are given without prejudice to any future detailed representations that we may make throughout the examination process. We may also have further	Highways England notes the Environment Agency's comments. Highways England and the Environment Agency are working together on a Statement of Common Ground to be submitted in due course. Highways England anticipates reaching an agreement on all outstanding points with the Environment Agency and understands there are no significant issues remaining.

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	<p>representations to make when supplementary information becomes available in relation to the project. We have reviewed the draft Development Consent Order (DCO), Environmental Statement (ES) and supporting documents submitted to the Planning Inspectorate on the 25 January 2019 as part of the above mentioned application. We are generally satisfied with the level of information submitted and on the whole our recommendations have been incorporated, where suggested throughout the pre-application process. There are also Environmental Permitting matters to be dealt with outside of the DCO, which require resolution and we are also working with Highway England's consultant to address these matters.</p> <p>Water Quality We have considered the potential impacts on surface water quality and we are satisfied with the details covered in the ES Chapter 14: Road Drainage and the Water Environment. We welcome the Water Framework Directive Compliance Assessment (document reference TR010024/APP/6.3 Appendix 14.3) and the results from the HAWRAT assessment (Appendix 14.3) which shows that the alteration to the road network drainage creates a slight betterment in water quality. We recommend that there is a link made to the government's 25 Year Plan for the Environment. In particular the opportunities to link with the Government's 25 Year Plan for the Environment and it's ambition to include the principle of 'net gain' in any development. Opportunities to demonstrate this would include habitat creation and diversity around the SuDS and drainage system, design of the surface water outfalls, mitigation for the creation of the new outfalls and an abandonment plan for outfall 4, especially as this is adjacent to the downstream exit of the A19 culvert which has potential fish passage issues.</p>	<p>The A19 Downhill Lane Scheme would create a net gain in keeping with the Government's environmental goals and help to provide a better place for people to live and work, as follows:</p> <p>The indicative Environmental Masterplan (drawing HE514495- JAC-ELS-MULTI-DR-L0001) illustrates the key mitigation measures for the Scheme identified in the Environmental Statement (ES) (Application Document Reference: TR010024/APP/6.1 / APP-020), including overall habitat creation, retention, re-creation / re-establishment and planting proposals. Improved habitat quality / diversity can also improve flood protection and water quality. The indicative Environmental Masterplan is referenced in the Draft Development Consent Order (DCO) Requirement 5 (Application Document Reference: TR010024/APP/3.1(3), Schedule 2) to make sure its commitments are secured in the final landscaping scheme. There would be a net gain of 3.91ha in habitat types assessed as being of county importance or above (see Table 9.10 of the ES) and 1.85 km of linear planting, trees and shrubs would be planted against 0.63 km lost, representing a net gain of 1.02 km.</p> <p>As discussed in Chapter 14 of the ES, in particular Appendix 14.3 'Water Framework Directive' (Section 5 WFD Assessment Conclusion), the improvements to the existing drainage system would lead to a betterment in water quality discharge from Downhill Lane junction to the River Don (from Outfalls 1 and 6) and River Wear (from Outfalls 7 and 8).</p> <p>Overall, Non-Motorised Users (NMUs) would experience a long-term beneficial effect as a result of improved connectivity (particularly with Bridleway B46), improved safety and improved amenity.</p> <p>The Register of Environmental Actions and Commitments ("REAC") (Appendix 1.3 of Application Document Reference: TR010024/APP/6.3 / APP-032) captures the design and monitoring commitments from the ES for planting proposals (woodland and linear planting especially) and wetland creation (e.g. commitments LVIA5 and ECOL2). As well as the REAC forming part of the Construction Environmental Management Plan, delivery of the proposed landscape and ecology design and mitigation commitments would also be achieved through DCO Requirements 3, 4, 5 and 8 (Application Document Reference: TR010024/APP/3.1(3), Schedule 2).</p> <p>Outfall 4 to the River Don would be abandoned (not physically removed) as part of the Scheme since the drainage system for Catchment 4 is to be discharged, in combination with Catchment 1's discharge, via a new Outfall 1 being constructed as part of the Testo's scheme. This aligns with the principle of 'no physical works proposed within the River Don' that has formed the basis of the environmental assessment, especially the Water Framework Directive compliance assessment in Appendix 14.3 of the ES.</p> <p>However, following a request by the Environment Agency, a review was undertaken to ascertain whether removal of Outfall 4 would support the Water Framework Directive to reduce the extent of hard bank structures along the River Don. The review concluded that Outfall 4 could not be removed for the following reasons:</p> <ul style="list-style-type: none"> • Outfall 4 comprises a very small built structure within the River Don embankment and is fully enclosed in established riverside vegetation. Therefore, the physical removal of the outfall would create a large area of temporary loss of vegetation and river habitat disturbance for very small gain. • Outfall 4 lies immediately adjacent to the larger River Don culvert under the A19, thereby posing a potential risk to the structural integrity of the culvert's wing wall through excavations and subsequent scour at this location.

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		<p>Flood Risk The scheme is located within Flood Zone 1 (low probability of flooding) on the Environment Agency Flood Map for Planning. However as part of the IAMP AAP and IAMP ONE and TWO developments more recent flood risk modelling has been carried out and validated by the Environment Agency. As such our current flood maps are not the most up-to-date information and are due to be amended later in the year. As a result the submitted Flood Risk Assessment (document reference TR010024/APP/6.3 appendix 14.2) dated January 2018 has not taken into consideration the latest flood modelling and we would advise this to be included in an updated FRA and used as the baseline. As the Environment Agency is not the licenced data holder we would advise that Highways England contact IAMP LLP for this information.</p>	<p>Paragraph 14.6.27 of the ES, in Section 14.6 'Potential impacts (without mitigation)', states the Scheme is not at risk of flooding, but flood Zones are set to change in the near future, which will increase the extent of Flood Zones 2 and 3 and bring a small area of proposed tree planting into Flood Zone 2.</p> <p>The Environment Agency has since provided updated Flood Zone maps, which have been used in the 'IAMP TWO Flood Modelling – Draft Hydraulic Modelling Report' (JBA Consulting, November 2018). This recent report produced by JBA on behalf of IAMP LLP seeks to compare the modelling results of the IAMP TWO scheme against the existing and IAMP ONE modelling. When compared to their previous report, which was reviewed when assessing the Scheme's impacts in the ES, there is no change in the flood extents and depths relating to the area near the Scheme. Therefore, as there remains no encroachment by the Scheme with the exception of tree planting on the edge of Flood Zone 2, there would be no impact from the Scheme on flood risk and no requirement for an Environmental Permit for works within a floodplain from the EA.</p>
		<p>Ground Water And Contaminated Land We have reviewed the submitted information, including ES Chapter 10: Geology and Soils, and we are satisfied with the details covered in relation to ground water and land contamination that may impact controlled waters. Most of the groundwater related activities are covered by permits that are required outside of the DCO process. It is the Highways Authority who have the primary responsibility to control the discharge of highways run-off, and include adequate pollution prevention techniques. However, infiltration of run-off to ground is not a major component of the scheme with the water quality impact assessments focussing on surface waters.</p>	<p>Noted.</p>
		<p>Environmental permitting Flood risk activities outside of the DCO process, environmental permits will be required for certain elements of this development where flood risk activities will take place:</p> <ul style="list-style-type: none"> • on or within 8 metres of a main river (16 metres if tidal) • on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal) • on or within 16 metres of a sea defence • involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert • in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and without having planning consent in place. <p>Permits will also be required for any other flood risk activities which meet the above criteria for any temporary works or structures during construction.</p>	<p>See our response on "flood risk" above – there is no requirement expected for an Environmental Permit from the EA concerning flood risk.</p>
		<p>Protective Provisions Highways England did not seek disapplication of any of the Environment Agency's consenting regimes in the version of the draft DCO submitted with the application, therefore our initial view is that the protective provisions for our benefit included in the draft Order are unnecessary and would result in duplication. We are continuing to discuss this issue with Highways England and their consultant and will comment in further detail in our written representations.</p>	<p>Noted. Highways England agrees that no disapplication of the environmental permitting regime is sought, there is no requirement for protective provisions.</p>
R10	John Belshaw [RR-010]	<p>I am a cyclist that uses the bridal path between the A184 and Downhill Lane to get to work and i am concerned that the bridal path will be closed forcing me to go down Downhill lane with the other diverted traffic when work commences.</p>	<p>Full details of the assessment of impacts during construction on users of Bridleway B46 can be found in section 13.6 of the Environmental Assessment (Application Document Reference: TR010024/APP/6.1 / APP-020). During construction, there would be some disruption to existing NMU routes because of works to divert statutory services, highways works, works to improve the NMU facilities themselves or construction of new NMU facilities. It is anticipated that all existing NMU connections would be kept open during construction through the DCO boundary area, although diversions may be required in some places. Consequently, journeys are likely to increase in length and duration during temporary, localised diversions.</p>
R11	BNP Paribas for Royal Mail [RR-011]	<p>Under section 35 of the Postal Services Act 2011 (the "Act"), Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service. The Act includes a set of minimum standards for Universal Service Providers, which Ofcom must secure. The conditions imposed by Ofcom reflect those standards. Royal Mail is under some of the highest specification performance obligations for quality of service in Europe. Its performance of the Universal Service Provider obligations is in the</p>	<p>Noted.</p>

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	<p>public interest and should not be affected detrimentally by any statutorily authorised project. Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network. Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.</p> <p>Gateshead Mail HUB is 4 miles from the proposal site. There are four other operational facilities within 9 miles:</p> <ul style="list-style-type: none"> • Gateshead Mail HUB NE10 8YF • Sunderland Delivery Office SR5 2TG • Washington Delivery Office NE37 1BL • Tyneside Mail Centre NE11 0YY • Sunderland Call Centre SR3 4XW <p>This section of the A19 is a strategically important distribution route for Royal Mail. In exercising its statutory duties, Royal Mail uses all of the other main roads in the vicinity of the Downhill Lane junction and the A1290 on a daily basis. Royal Mail supports these proposed junction improvements as these works, once completed, will improve traffic flows.</p>	
	<p>However, it is concerned that during the construction phase of this proposed improvement its ability to provide an efficient mail sorting and delivery service to the public, in accordance with its statutory obligations, may be adversely affected by additional road traffic or delays associated with the construction of this junction improvement in parallel with other NSIPs and major developments in the area including the A19 Testo's Improvements and IAMP.</p>	<p>Highways England, which is promoting both the Scheme and the A19 Testo's scheme, and the promoters of IAMP have been collaborating to ensure as far as practicable that the schemes can be delivered efficiently, minimising the impact on the public and key stakeholders such as Royal Mail. Details regarding the interrelationship between these projects is summarised in the interrelationship document submitted with the application for the Order (Application Document Reference: TR010020/APP/7.3 / AS-023).</p> <p>Detailed information regarding the current phases of construction can be found in section 2.15 of the Environmental Statement (Application Document Reference TR010020/APP/6.1 / APP-020).</p> <p>Highways England is continuing to work to provide a more free-flowing network where delays are less likely. In particular, addressing customer concerns about the impact of roadworks and taking further action to improve the response to incidents and congestion. Highways England's target is to maximise lane availability so that it does not fall below 97% in any one rolling year.</p>
	<p>In order to address this Royal Mail requests that the final DCO includes specific requirements that:</p> <ol style="list-style-type: none"> 1. Royal Mail is pre-consulted by Highways England on any proposed road closures/ diversions/ alternative access arrangements, hours of working and the content of the final Constriction Traffic Management Plan (CTMP). 	<p>Highway's England, in constructing any scheme, will consult as necessary on traffic management and seek to ensure that in so far as possible any proposals are dovetailed with other proposals in the area to give a seamless transition for road users.</p> <p>Highways England does not consider any amendment is required to the draft DCO (Application Document Reference: TR010020/APP/3.1(3)) for the following reasons:</p> <p>The authorised development must be constructed in accordance with a Traffic Management Plan (TMP) which is to be submitted to and approved in writing by the Secretary of State, following consultation with the relevant planning authority. This is secured in Requirement 10 of the draft DCO.</p> <p>As part of the (separate) TMP for the A19 Testo's Junction improvement scheme, a traffic management forum was established in which all key stakeholders invited to discuss the development of traffic management proposals, to create a common understanding of traffic management measures and phasing, to report scheme progress and to monitor any specific objectives related to traffic management.</p> <p>Highways England notes that Royal Mail is already on their list of named consultees for this traffic management forum. Royal Mail is represented at these meetings and Highways England will ensure this forum continues and is established in relation to the Scheme.</p> <p>Highways England will accordingly continue to liaise with South Tyneside Council and Sunderland City Council, emergency services and key stakeholders such as Royal Mail, Nissan, and other major</p>

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			local employers to ensure it understands any particular issues and where possible put measures in place to mitigate impacts on travel due to the roadworks these discussions will inform the development of the TMP.
		2. The final CTMP includes provision for a mechanism to inform major road users about works affecting the local network (with particular regard to Royal Mail's distribution facilities in the vicinity of the DCO application site).	As set out above, Highways England has established a mechanism for informing key stakeholders about traffic management measures as the construction programme proceeds through the traffic management plan. This is secured in the draft DCO and Highways England does not consider any further amendment is required.
		Royal Mail reserves its position to object to the DCO application if the above requests are not adequately addressed.	Noted.
R12	Natural England [RR-012]	Natural England have been a part of stakeholder consultation from the beginning of the development planning process. As such Natural England have no further comment to make regarding this proposal.	Noted. Highways England refers to the submitted Statement of Common Ground between Highways England and Natural England submitted on 6 August 2019.