

Application by RiverOak Strategic Partners Ltd for an Order Granting Development Consent for the upgrade and reopening of Manston Airport

Written Representation from J.D.I. Baker, 15 February 2019

My reference: 20014834

1. I refer to the Transport Assessment (“TA”), which forms Volume 15 of the Environmental Statement. My principal concern is impacts on the strategic road network, specifically the M2, the A249, and M2 junction 5 which links these roads.
2. Impact on the M2 is also an issue which Canterbury City Council will be raising in its Local Impact Report, due for submission today, the draft of which was amended and approved by its Policy & Resources Committee on 6 February 2019.
3. I have grave concerns about the Passenger Trips Distribution in Table 8.2 of the TA. The key issues are:-
 - (a) the omission of trips from the Medway local authority area (which has a greater population than any other local authority area in Kent). This is a clear error and requires rectification.
 - (b) the inherent unlikelihood that there will be fewer passengers from London (and all points around it outside Kent, such as Surrey and south Essex, which are not accounted for separately) than from Dover District. I find this counter-intuitive and it requires explanation – for example, by producing passenger origin data from previous operational periods.
 - (c) the assumption that all Swale traffic will leave the M2 at junction 6 and use the A251. This cannot be true – the great majority of population in Swale District is in Sittingbourne and Sheerness, not Faversham, and thus most of the Swale traffic would route via the M2 junction 5 and the A249. Few people use junction 6 and the congested and slow A2 to reach Sittingbourne from the east.
4. Tables 8.3 and 8.4 assume that all West and South London HGV traffic will use the M2 to its end, then the A2 and the A282 to reach the M25 towards Surrey. This route is not only fictitious (as in fact one does not use the A282 at all, since there is a direct junction between the A2 and the M25) but also is a minority choice, as it is several miles longer than the more common choice which is M2 – A249 – M20 – M26 – M25. Therefore the impact on the A249, and the sub-standard M2 junction 5, have been underestimated.
5. Tables 8.3 and 8.4 further assume that there will be negligible traffic to/from freight distribution and servicing sites throughout Kent, other than Ashford. This ignores the fact that there are more warehousing/depot facilities in the Swale and Aylesford areas than in Ashford, yet these do not figure at all. For this reason, more trips are likely to occur along the M2 as far as junction 5 than estimated.
6. The above means that Table 8.6 is cumulatively significantly in error and requires amending. The implication of this is that the proportion of traffic using the M2, especially the two-lane section between junctions 5 and 7, and the A249 both

south and north from junction 5, have been materially underestimated in all assessment work reported in the TA.

7. As a result, Figures 8.1 – 8.4 are wrong (it is indeed very noticeable that these show no traffic leaving the M2 towards Medway, along the A278, A229 or A228, which is irrational and unjustified).
8. Crucially, Table 8.8 is wrong due to the cumulative impact of these errors, so the conclusions in paras. 8.5.3, 8.5.4 and 16.5.1 are also wrong.
9. I have lived in Canterbury for over 30 years and have experienced personally the increasing volumes of traffic and congestion on the M2 between junctions 7 and 5, at junction 5 itself, and at M20 junction 7 where the A249 meets the M20, over that time.
10. The two-lane section of M2 is now operating in congested, choked conditions in peak hours every weekday, and a principal cause of this is the effect of HGVs on this road. As HGVs can overtake each other on a two-lane motorway, it is common to find an HGV travelling at say 62 mph move out to overtake another HGV travelling at 60 mph. This process blocks the entire road for a significant period of time, resulting in lengthy queues of cars and other traffic building up behind the HGVs until their manoeuvre is completed. When this happens repeatedly, journeys are lengthened for thousands of vehicles, leading to driver frustration and reckless manoeuvres whenever progress can be made by so doing.
11. It is wrong for the TA, therefore, to assert that its (underestimated) impacts of additional traffic on the M2 are “not considered significant”. Owing to the conditions on this road, a very much lower threshold of significance must be applied.
12. Moreover, none of the TA appears to take account of committed developments which will load additional traffic, especially HGVs, onto the M2 / A249. Of these, the resumption of ferry services at Ramsgate Port is the most significant, as this would place a new volume of HGVs onto these roads which have not existed for many years, during which time other traffic has increased enormously. The newly-adopted Canterbury District Local Plan 2017, with large-scale residential proposals in Canterbury, Whitstable, Herne Bay and Sturry, is the other principal factor that has not been reflected. These need to be built in, because they will themselves mean that the M2 and A249 perform significantly worse than they do today.
13. Please would the Examining Authority kindly notify me when a revised TA has been produced addressing these concerns, and allow me the opportunity to comment thereon and to attend the relevant Hearing Session to discuss these matters.

J.D.I. Baker.
Canterbury, Kent.
15 February 2019.