

**APPLICATION BY RIVEROAK STRATEGIC PARTNERS TO UPGRADE AND
REOPEN MANSTON AIRPORT
PLANNING INSPECTORATE REFERENCE TR020002
DEADLINE 6 – 3RD MAY 2019
REPRESENTATION FROM HIGHWAYS ENGLAND**

Responses to the Examining Authority’s Written Questions

Tr.2.49	Highways England	<p>Section 8 - Highways England Network Impacts Considers the impact on the strategic highway network.</p> <p>i. Are the likely trip generation and distribution figures presented in Section 8.2 accepted by Highways England?</p> <p>Highways England does not accept that the trip generation figures provide a robust indication of the levels of traffic likely to be generated by the proposal. Specifically this relates to B8 Warehousing Trip Generation – Northern Grass Area (NGA). Highways England considers that the HGV trip rates proposed by the Applicant from the ‘TRICS’ database are not appropriate and that a more likely HGV trip rates from TRICS would result in the following uplift of HGV flows on the SRN compared with those proposed by the Applicant:</p> <p><u>M2 J7 (Brenley Corner)</u></p> <p>AM Peak: +28 HGV trips PM Peak: +20 HGV trips</p> <p><u>A2/A256 (Whitfield Roundabout)</u></p> <p>AM Peak: +1 HGV trip PM Peak: No increase</p> <p>Therefore we consider that there is likely to be a significantly greater impact on Brenley Corner from development traffic than the applicants have assessed within their modelling.</p> <p>In relation to the revised trip distribution figures provided to Highways England on the 18th April 2019 (Manston Airport DCO Transport Assessment Addendum Figures 8.1 and 8.2 - Highways England network traffic impacts – AM and PM peaks) we confirm that we are content that the figures are representative in terms of percentage distribution of traffic but the quantum of each movement is not agreed in relation to the trip generation as indicated above.</p>
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	<p>The revised trip distribution provided by the applicant is accepted by Highways England.</p> <p>ii. Is the Applicant's conclusion that there would be a negligible impact on the strategic highway network at peak hours accepted by Highways England?</p> <p>Highways England do not accept the applicant's conclusion that there will be a negligible impact on the SRN because this has not been robustly demonstrated in the Applicant's Transport Assessment and Addendum.</p> <p>The revised trip distribution provided by the applicant and now accepted by Highways England shows that there are an additional 49 vehicular trips through the A2/A256 Whitfield Roundabout in the AM peak and 51 vehicular trips in the PM peak. Of particular concern in the AM peak period is the additional 39 right turn vehicular movements from the A256 Whitfield Hill arm of the junction to the A2 southbound arm. This movements cuts the southbound flow of traffic from the A2 northern arm of the junction. In the AM peak period severe queuing currently occurs southbound on the A2 northern arm of the roundabout. Accordingly, an assessment is required to determine the likely additional delay and queuing at the Whitfield roundabout with specific attention on the A2 southbound approach.</p> <p>Also, with the revised HGV trip generation as provided above, a Merge/Diverge Assessment will need to be undertaken at M2 Junction 7 Brenley Corner on the basis that there are already severe delays experienced at the junction during the peak network periods and the additional throughput of traffic is likely to increase the delay and queuing experienced.</p> <p>As no assessment of Brenley Corner and Whitfield Roundabout has been provided by the Applicant and in view of the short time remaining until the end of the Examination Highways England will undertake its own assessment of both junctions.</p> <p>From the revised Trip Distribution provided by the applicant and Highways England's own assessment of Trip Generation we can agree that there will be negligible impact at the A2 Duke of York roundabout and this junction only needs no further consideration.</p>
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Summary of Highways England's current position

1. Highways England continues to be engaged with the Applicant and with Kent County Council on traffic modelling, the assessment of the impact of the proposed Development on the Strategic Road Network, whether there is a need for mitigation of that impact on the SRN and what form any mitigation should take.
2. The Examining Authority requested a Statement of Common Ground between Highways England and the Applicant at Deadline 3, but the Applicant declined to complete one to that timeline.
3. At Deadline 3 Highways England set out its understanding of matters that were agreed and, respectively, not yet agreed with the Applicant as follows:

Matters Agreed

- a. Highways England is neutral on the principle of the proposed Development.
- b. The methodology on the distribution of traffic from all airport operations on to the Strategic Road Network is agreed.
- c. It is agreed that an assessment of the impact of the proposed Development on M2 Junction 7 is required.
- d. The methodology on Freight is agreed
- e. The methodology on Fuel Tanker is agreed
- f. The methodology on Servicing is agreed

Matters not yet agreed

- g. The traffic generated by the proposed development is not yet agreed.
- h. The impact of the proposed development on the Strategic Road Network, the need for mitigation and the form of any mitigation are not yet agreed.
- i. The need or otherwise for the assessment of the impact of the proposed Development on the A2/A258 'Duke of York' roundabout at Dover is not yet agreed.

The Applicant's response as set out in REP4-029 Tr 1.39 was "The Applicant is continuing to liaise with Highways England regarding the impacts of development traffic at M2 J7 and agreeing a SoCG." However the Applicant has not sought to recommence discussions on a SOCG.

No substantive change has occurred since Deadline 3 except that the forecasts from the Applicant's revised Transport Assessment demonstrate that the proposed development will impact on the A2/A256 'Whitfield' roundabout rather than the A2/A258 'Duke of York' roundabout. Therefore

- i. It is agreed that that there will be negligible impact at the A2 Duke of York roundabout and this junction needs no further consideration.
- ii. The need or otherwise for the assessment of the impact of the proposed Development on the A2/A256 'Duke of York' roundabout at Dover is not yet agreed.

Also our understanding is that the Applicant no longer agrees that an assessment of the impact of the proposed Development on M2 Junction 7 is required. Therefore, as set out above, Highways England will carry out its own assessment of Brenley Corner.

4. Highways England will continue to seek to reach agreement with the Applicant on outstanding matters before the end of the Examination.
5. At present Highways England remains of the view, set out in our Relevant Representation [RR-0673], that the applicant has not demonstrated that the development will have an acceptable impact on highway safety or that the residual cumulative impacts on the road network would not be severe. Therefore Highways England continues to object to the proposed development.

Highways England
3rd May 2019