

**APPLICATION BY RIVEROAK STRATEGIC PARTNERS TO UPGRADE AND REOPEN MANSTON AIRPORT
PLANNING INSPECTORATE REFERENCE TR020002
DEADLINE 7a – 24th MAY 2019
REPRESENTATION FROM HIGHWAYS ENGLAND**

Responses to the Examining Authority's Third Written Questions

ExA No.	Question	Highways England Response
Tr.3.35	<p>Strategic Highway Network Impacts Highways England's response to second written question Tr.2.49 [REP6- index number to be allocated] states: "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: M2 J7 (Brenley Corner) AM Peak: +28 HGV trips PM Peak: +20 HGV trips A2/A256 (Whitfield Roundabout) AM Peak: +1 HGV trip PM Peak: No increase 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><i>"Why does HE consider that the HGV trip rates proposed by the Applicant from the TRICS database for B8 Warehousing Trip Generation – Northern Grass Area (NGA) are not appropriate?"</i></p>	<p>Highways England considers that the trip rates proposed for B8 commercial warehousing are not representative as the applicant's assessment utilises trip rates derived from only two sites taken from the TRICS database. In terms of best practice, section 11.2 of the TRICS user guide states that as many sites as possible should be included to give a representative sample. Using the same selection parameters there are a greater number of sites available in the 'trip rates for vehicles' calculation options.</p>

ExA No.	Question	Highways England Response
Tr.3.36	<p>Highways England’s response to second written question Tr.2.49 [REP6- index number to be allocated] also states: “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. 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. 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><i>“When will HE undertake its own assessments and make these available to the ExA? These should be provided at Deadline 7a to be able to inform discussion at the issue specific hearing on 6 June 2019.”</i></p>	<p>Highways England has completed its own assessments and these show that the proposed development will not have a material adverse impact on the Strategic Road Network.</p> <p>Highways England therefore withdraws its objection to the proposed development.</p>

ExA No.	Question	Highways England Response
Tr.3.37	<p><i>“The Applicant’s response to second written question Tr.2.51 states that trips from Medway local authority area should have been included in Table 8.2 of the RTA and provides a new table showing distribution from West Kent.</i></p> <p><i>Do Highways England and KCC agree with the revisions to the distribution?”</i></p>	<p>Section 4.7.9 of the Revised Transport Assessment (RTA) makes reference to 12.5% of passenger trips originating from West Kent, based on evidence presented to the Airports Commission in 2014. The Applicant’s response to Tr.2.51 states that Table 8.2 of the RTA should have included the proportion of the 12.5% that came from Medway but did not, and that this was an omission. The table provided in response to Tr.2.51 states that 3.58% of passenger trips will originate from Medway based on the distribution of trips derived from the gravity model, which amounts to 6 two-way trips in the AM peak hour and 4 two-way trips in the PM peak hour.</p> <p>Although Highways England have not been provided with the gravity model itself for review, this small proportion of passenger trips originating from Medway is considered to be robust given that the Medway area forms part of the ‘floating catchment’ area rather than the ‘core catchment’, and as such is more likely to be served by Gatwick Airport.</p>
Tr.3.38	<p><i>An Interested Party [REP3-152] raised the following concern: “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.” The Applicant’s response to this as part of the second written question Tr.2.51 [REP6-index number to be allocated] states: “The assumptions concerning the M2 at Junction 6 and the A251 have been agreed with KCC and Highways England and are therefore not considered to be in question. In any event, even if the routing was altered as suggested, the quantum of traffic would be so small as to not make any material difference.”</i></p> <p><i>Do HE and KCC agree with the Applicant’s statement?</i></p>	<p>Highways England’s Representation to Deadline 6 stated under ‘Matters Agreed’ that <i>“The methodology on the distribution of traffic from all airport operations on to the Strategic Road Network is agreed.”</i> Notwithstanding this, the quantum of traffic in question is small and highly unlikely to make a significant difference. Highways England have a major improvement (Road Investment Strategy - RIS) scheme planned at M2 J5 starting in early spring 2020 which will cater for any rerouting should that occur. Completion of the RIS scheme is expected in late 2021.</p>

ExA No.	Question	Highways England Response
Tr.3.39	<p>An Interested Party [REP3-152] raised the following concern:</p> <p>“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 substandard M2 junction 5, have been underestimated. 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.” The Applicant’s response to this as part of the second written question Tr.2.52 [REP6-index number to be allocated] states: “Tables 8.3 and 8.4 refer to “West and South London” and do not specifically refer to Surrey as a destination. Route mapping software identified that the journey distance via the A2 is comparable to that by the A249 and marginally quicker. The assumption is that the majority of freight (95%) will be distributed to London and the surrounding area. The remaining traffic is diluted into the network, assuming 2% to Dover and Folkstone Port, 2% to Ashford freight distribution sites and 1% to Ramsgate Port. The actual volume of HGVs is so small as to not make any material difference.” Do HE and KCC agree with the Applicant’s view?</p> <p><i>Do HE and KCC agree with the Applicant’s view?</i></p>	<p>With reference to section 4.7.13 of the RTA, Highways England understand that the vehicular distribution of freight trips was based on the information provided to the Airports Commission in 2014. The distribution remains unchanged from the TA, however has been matched to the zones in the Thanet Strategic Transport Model (TSTM).</p> <p>Highway’s England therefore consider the proposed distribution of freight trips to be acceptable. Using Highways England freight trip rates our assessments of the SRN demonstrate there is no significant material impact on the operation of our network.</p>