

**Deadline 7a** (24 May 2019) – KCC’s response to the ExA’s Third Written Questions

No.	ExA’s Question	Response
	<b>DCO.3 Draft Development Consent Order (DCO)</b>	
DCO.3.10	Article 11: Construction and maintenance of new, altered or diverted streets	It is understood that the effect of the amendment is to require that the street is constructed to the reasonable satisfaction of the highway authority and will be maintained by the highways authority, unless agreed otherwise in writing, and that the addition here is to such agreement having to be ‘in writing’.
	Indicate whether you are content with the wording in Article 11(1) and, in particular, whether you are content to accept responsibility for maintaining at your expense from completion of new, altered or diverted streets	This article should be altered to reflect the typical requirement for a specified maintenance period to be applied, directly after completion of new, altered or diverted streets for a period to be specified by the Local Highway Authority. This is generally set once the specific details such as geological and construction specification and workmanship relating to the highway infrastructure has been identified in more detail. This is normally identified as part of an agreement under Section 278 of the Highways Act 1980.
	<b>Landscape and visual</b>	
LV.3.1	Further issues relating to Landscape and Visual be examined in the Issue Specific Hearings to be held from 3 to 7 June 2019.	KCC welcomes the fact that the ExA is considering whether it should be a requirement in the draft DCO that the authorised development should have an SOAEL5 daytime of 60 dB LAeq,16hr (free field) and that the Noise Mitigation Plan would be amended appropriately throughout to reflect this revised SOAEL daytime. As stated by KCC in the Local Impact Report, although “ <i>these meet the requirements of the Aviation Policy Framework, we would encourage the applicant to go beyond minimum standards given the increase in sensitivity to aviation noise. The EU Position Paper (2002) and EAA Position Paper (2011) found that 15% more people are highly annoyed at 50dBA just within 9 years. Based on projections by the applicant, in year 20 only 115 properties are within the Significant Observable Adverse Effect Level (SOAEL) contour, so it might be possible to extend the relocation scheme to that area on a discretionary basis, perhaps if they have experienced a 3dB increase in noise (as per Gatwick’s scheme) as use of the Airport increases. Gatwick’s insulation scheme is also based on the lower 60dB LAeq 16hr contour.</i> ”
	Significant Observed Adverse Effect Level (SOAEL) daytime	
	The ExA is considering whether it should be a requirement in the draft DCO that the authorised development should have an SOAEL5 daytime of 60 dB LAeq,16hr (free field). The Noise Mitigation Plan would be amended appropriately throughout to reflect this revised SOAEL daytime.	
	What are the views of all IPs on this revised SOAEL daytime?	
	<b>Transport</b>	
TR.3.8	Off-Site Junction Mitigation	i) KCC suggests that the ‘existing highway boundary’ is an area of land for which the Local Highway Authority is responsible for maintenance at public expense, and as such falls under the provisions of the Highways Act 1980.
	The Applicant’s response to second written question Tr.2.4 [REP6-index number to be allocated] states:	ii) In order to ensure that the mitigation proposals can be achieved within the existing highway boundary (adopted highway), it is necessary for the applicant to provide a relevant highway boundary plan, which can be sourced directly from the KCC Highway Definition Team, for each location and preferably overlay this information onto the proposed scheme drawings to demonstrate that proposed improvements fall within the adopted highway.
	<i>“All other junction improvements can be delivered within the existing highway boundary.”</i>	iii) Until this information has been provided, it is not possible for KCC to agree with this statement.
	i) What is meant by ‘existing highway boundary’?	Please note that the typical timescale for processing highway boundary enquiries is 20 working days. Further information can be found at the following web link:-
	ii) Provide further justification in the form of landownership plans, to support this statement for each off-site junction improvement, including those required for highways safety by deadline 7a.	<a href="https://www.kent.gov.uk/roads-and-travel/what-we-look-after/highway-land/highway-boundary-enquiries">https://www.kent.gov.uk/roads-and-travel/what-we-look-after/highway-land/highway-boundary-enquiries</a>
	iii) Do KCC agree with this statement?	KCC accepts that this amendment is unlikely to make a material difference to the highway capacity assessments presented in the TA Addendum.
TR.3.12	Peak Movements	
	The Applicant’s response to second written question Tr.2.10 [REP6-index number to be allocated] states:	
	<i>“In light of the slight delay to the start of construction, the peak in traffic movements will be in 2041. Assuming the same approach to growth of traffic based on TEMPro, this would result in an additional 1.1% of background traffic growth in the two-year period</i>	

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	<p><i>between 2039 and 2041 which is a small amount of growth. Essentially, the contribution from the Proposed Development will not change even though background traffic increases by a marginal amount and as such the impacts reported are unlikely to change.”</i></p> <p>i Do KCC agree with this view?</p> <p>ii Does this matter materially affect other assessments in the ES?</p>	
<p>TR.3.15</p>	<p>Study Area</p> <p>KCC’s response to second written question Tr.2.11 [REP6-index number to be allocated] states:</p> <p><i>“i. For clarification, the traffic routing from the proposed development has now been derived from a select link analysis exercise, which was extracted from the KCC Strategic Highway Model (referred to in the TA addendum as the KCC TSTM).</i></p> <p><i>The detail of this flow distribution does not appear to have been appended to the TA addendum document. It is recommended that this data is extrapolated into a network flow diagram (including a comparison of the tested scenarios) in order to provide more visual clarity over the level of additional impact on the surrounding highway network. This would also assist in efficiently identifying areas of significant traffic increase (both inside and or links that fall outside of the detailed area of model coverage). At present, the Applicant appears to have made the decision to restrict their assessment to the extent of KCC TSTM coverage.</i></p> <p><i>Without the above information clearly presented within the TA, it is not possible to easily identify exactly where traffic from the development will be increasing on the surrounding highway network and if the proposed scope of assessment is appropriate. It is agreed that areas of the network that are subject to minimal or no traffic impact will not generate a requirement for additional assessment (and can be removed from scope), however there appear to be several junctions that have been omitted simply due to them not being included in the KCC TSTM network, which at this stage is not accepted.</i></p> <p><i>Whilst it is recognised that most of the local road network which is covered by the KCC TSTM will assist in the assessment of potential traffic routing, appraisal of impact should not necessarily be solely constrained by the model coverage area.</i></p> <p><i>At this stage junctions 1,9, 25 &amp; 28 are notable omissions. If these junctions (or all of the associated turning movements) are not included within the KCC TSTM, it does not automatically render impact assessment as being unnecessary. The Applicant should outline a strategy for dealing with this issue for further consideration through the examination process.</i></p> <p><i>ii. At this stage, KCC refutes the assertion within the TA addendum that the removal of junctions listed in this section has been formally agreed. As stated in response to Question TR.2.2 (above), the area covered by the TSTM does not align with the TA study area and therefore the omission of junctions that fall outside of the TSTM area cannot be agreed by KCC until such time that the absolute impact of the proposed development traffic on those junctions is confirmed. The Local Highway Authority can then make a professional judgement as to whether full junction capacity assessments and/or mitigation is required in these cases.”</i></p> <p>i) What is the Applicant’s response?</p> <p>The Applicant at Appendix TR.2.11 of the supporting appendices [REP6-index number to be allocated] to the response to Second Written Questions includes diagrams of the select link analysis at am and pm peaks.</p> <p>ii) Does this address this particular matter for KCC?</p>	<p>ii) The provision of the network diagram is helpful in illustrating the absolute traffic impact from the development proposals in the future and fulfils the request made in Tr.2.11. This does, however, highlight further area of interest which should be addressed by the applicant.</p> <p>Following interrogation of the network diagram, Junction 1 (Sandwich Road / A256 / Jutes Lane), Junction 25 (Manston Road / Tesco Access) and Junction 28 (A255 / Park Lane / Wilfred Road / Grange Road) should be subject to formal capacity assessment. Appropriate mitigation proposals should be progressed if adverse impacts are identified.</p> <p>There are also material traffic flows entering / leaving the current network study area on the A256 (177 and 155 two-way traffic movements in the AM and PM peaks respectively). As such, the study areas should be expanded to encompass the area of potential impact. Appropriate mitigation proposals should be progressed if adverse impacts are identified.</p> <p>There are material traffic flows entering / leaving the current network study area on the A299 Thanet Way at St Nicholas-at-Wade, that should be assessed (111 &amp; 84 two-way traffic movements in the AM and PM peaks respectively). This would suggest that the study areas should be expanded to better understand potential impact on this link. Appropriate mitigation proposals should be progressed if adverse impacts are identified.</p> <p>There is a significant increase in traffic through/within Manston Village (B2050 Manston Road) of 258 &amp; 331 two-way movements in the AM and PM peaks respectively. Manston Village is subject to constrained highway geometry and very few pedestrian facilities. No specific mitigation proposals have been explored or proposed within the village for pedestrians or improvements at existing junctions such as High Street/ Preston Road. This is an area of concern for the highway authority.</p>
<p>TR.3.20</p>	<p>Passenger Departure Flights</p> <p>The Applicant’s response to second written question Tr.2.15 (i) [REP6-index number to be allocated] states:</p> <p><i>“The Applicant concedes that it is unlikely that there will be no passenger flights between 09.00 and 13.00. The pm peak is accepted to be the worst case scenario and that which is tested in the TA. By adopting a scenario where there are no flights between 09.00 and 13.00 more traffic is introduced into the pm peak therefore ensuring a robust case is presented in the TA.”</i></p> <p>i. Does the Applicant therefore accept that transport movements associated with passenger flight departures have been underestimated in the am peak?</p> <p>ii. How many passenger related transport movements would a passenger departure flight (as a worst case) generate?</p> <p>iii. Who has ‘accepted’ that the pm peak is the worst case scenario?</p> <p>iv. Section 6 of the RTA [REP5-021] identifies that for some junctions there is likely to be greater effects during the am peak than the pm peak (Junction 2 and 4 are just two of numerous examples). On this basis, how can it be asserted that the pm peak is the worst-</p>	<p>ix) The addition of passenger flight departures between 09:00 and 13:00 would increase vehicular trip generation during the AM peak period, which could potentially have material impacts on the capacity of junctions within the assessed area and thus significantly affect the conclusions of the submitted TA. At this stage of the Examination, it would appear that the only reasonable safeguard against this would be to secure a restriction on passenger flight departures between 09:00 and 13:00 in the draft DCO.</p>

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	<p>case scenario for every junction?  v. It is clear that some of the mitigation schemes are based on (or partly on) impacts at the am peak period. Can it be ruled out that the addition of more transport movements associated with a passenger flight(s) departure between 09.00 and 13.00 would not materially affect impacts at such junctions during the am peak or would not significantly affect the outcomes of the transport assessment?  vi. If not, how can this be addressed at this stage of the examination?  vii. Would the only reasonable way to achieve this be to secure a restriction on passenger flight departures between 09.00 and 13.00 in the draft DCO?  viii. How would this affect the feasibility and viability of the proposal?  ix. What is the view of KCC on this matter?</p>	
TR.3.22	<p>Junction Capacity Assessments  The Applicant’s response to second written question Tr.2.15 (i) [REP6-index number to be allocated] states:  <i>“The TSTM is dynamic and redistributes traffic as a result of changes to demand on the network. For example, if there is increased traffic at a junction or on a link which results in delay, traffic is reassigned on the network to reduce the extent of delay. This can cause reductions in overall traffic on an arm at a junction irrespective of the additional development traffic.”</i>  Is this accepted by KCC?</p>	<p>This is accepted by KCC.</p>
TR.3.24	<p>Junction 2  KCC’s response to second written question Tr.2.37 [REP6-index number to be allocated] states:  <i>“Whilst the Applicant’s response to KCC’s LIR is accepted in respect to lane markings, it is noted that the Applicant proposes a right pointing arrow on the eastbound approach to the proposed cargo facility access roundabout, which should be removed on this basis.”</i>  i. Does the Applicant agree?  The appendices supporting the Applicant’s response to Second Written Questions at Appendix Tr.2.57 [REP6-index number to be allocated] includes a Stage 1 Safety Audit of the junction.  ii. Is KCC content with its findings and the design response?  iii. Can the recommendations be suitably addressed and delivered during the detailed design stage?</p>	<p>i) KCC is not satisfied with the Designer’s Response, in that the requested swept path analysis for HGVs has not been provided to address the Auditor’s request. It is noted in this respect that KCC has previously requested swept path analysis drawings of this mitigation scheme on at least two previous occasions, primarily due to concerns regarding the potential for collisions between circulating vehicles on the roundabout gyratory. Indeed, this concern is identified separately by the Auditor.  ii) The above issue is not considered capable of being addressed at the detailed design stage, as it may require a significant revision of the mitigation scheme, potentially requiring land outside of the existing highway boundary.</p>
TR.3.25	<p>Junction 4  The appendices supporting the Applicant’s response to Second Written Questions at Appendix Tr.2.57 [REP6-index number to be allocated] includes a Stage 1 Safety Audit of the junction.  i. Is KCC content with its findings and the design response?  ii. Can the recommendations be suitably addressed and delivered during the detailed design stage?</p>	<p>i) KCC is not satisfied with the Designer’s Response, in that the requested swept path analysis for HGVs has not been provided to address the Auditor’s request. It is noted in this respect that KCC has previously requested swept path analysis drawings of this mitigation scheme on at least two previous occasions, primarily due to concerns regarding the potential for collisions between circulating vehicles on the roundabout gyratory.  ii) The above issue is not considered capable of being addressed at the detailed design stage, as it may require a significant revision of the mitigation scheme, potentially requiring land outside of the existing highway boundary.</p>
TR.3.26	<p>Junction 6  The appendices supporting the Applicant’s response to Second Written Questions at Appendix Tr.2.57 [REP6-index number to be allocated] includes a Stage 1 Safety Audit of the junction.  i. Is KCC content with its findings and the design response?  ii. Can the recommendations be suitably addressed and delivered during the detailed design stage?</p>	<p>i) KCC is not satisfied with the Designer’s Response, in that the requested swept path analysis for HGVs has not been provided to address the Auditor’s request. It is noted in this respect that KCC has previously requested swept path analysis drawings of this mitigation scheme on at least two previous occasions, primarily due to concerns regarding the potential for collisions between circulating vehicles on the roundabout gyratory. Indeed, this concern is identified separately by the Auditor.  ii) The above issue is not considered capable of being addressed at the detailed design stage, as it may require a significant revision of the mitigation scheme, potentially requiring land outside of the highway boundary.</p>
TR.3.27	<p>Junction 7  The appendices supporting the Applicant’s response to Second Written Questions at Appendix Tr.2.57 [REP6-index number to be allocated] includes a Stage 1 Safety Audit of the junction.  i. Is KCC content with its findings and the design response?  ii. Can the recommendations be suitably addressed and delivered during the detailed design stage?</p>	<p>There is a concern with a potential increased likelihood of side swipe collisions at this roundabout. The proposal for vehicles travelling between the A299 (west) approach and the A299 (south-east) exit to use either lane on the roundabout circulatory has the potential to cause collisions with vehicles making opposing manoeuvres (e.g. from the A299 (south-east) approach to the A28 (north-east) exit), whose drivers may not appreciate that they intend to continue past their exit. Therefore, KCC is not content with the findings of the Safety Audit.</p>

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<p>TR.3.28</p>	<p>Junction 12</p> <p>KCC’s response to second written question Tr.2.41 [REP6-index number to be allocated] states:  <i>“ii. It is noted that the inter-visibility splay between the Manston Road (north) and Manston Road (west) arms of the signalised junction layout falls outside of the highway boundary, which presents a highway safety risk. KCC would also reiterate its previous concern regarding the incorporation of uncontrolled right turns within the junction intersection. The alternative roundabout layout is therefore preferred by KCC and will maintain route consistency as the junctions between Haine Road and A299 (Via Spitfire way) predominantly consist of roundabouts.</i>  <i>iii. Both potential mitigation schemes (Signal and Roundabout) would have an impact on the footprint of the RAF Museum.”</i></p> <p>i. What is the Applicant’s response?  ii. Does the Applicant accept that the inter-visibility splay falls outside of the highway boundary?  iii. If so, how can this be overcome?  iv. How will the impact on the footprint of the RAF Museum building (as shown on Figure 7.5 of the RTA [REP5-021]) be addressed?  v. Why does KCC believe that the incorporation of uncontrolled right turns within the junction intersection would result in highway safety concerns?</p> <p>The appendices supporting the Applicant’s response to Second Written Questions at Appendix Tr.2.57 [REP6-index number to be allocated] includes a Stage 1 Safety Audit of the junction.</p> <p>vi. Is KCC content with its findings and the design response?  vii. Can the recommendations be suitably addressed and delivered during the detailed design stage?</p>	<p>vi) The incorporation of uncontrolled right turns within the junction intersection could result in forward visibility for right turning drivers becoming obstructed by vehicles making the opposing right turn, with the potential for collisions with oncoming traffic. This risk is considered particularly significant in relation to vehicles turning right from the B2050 Manston Road (north) into Spitfire Way, due to the curvature of the road. KCC is concerned that neither this issue nor the issue of the inter-visibility splay between Manston Road (north) and Manston Road (west) crossing third party land have been identified by the Road Safety Audit.</p> <p>KCC is not satisfied with the Safety Audit or Designer’s Response for the above reasons. Moreover, the requested swept path analysis for HGVs has not been provided to address the Auditor’s request.</p> <p>vii) The above issues are not considered capable of being addressed at the detailed design stage, as they may require a significant revision of the mitigation scheme, potentially requiring land outside of the highway boundary.</p>
<p>TR.3.29</p>	<p>Junction 15</p> <p>KCC’s response to second written question Tr.2.42 [REP6-index number to be allocated] states:  <i>“The Applicant’s proposed scheme of mitigation results in significantly increased queue lengths on the College Road approach to the junction relative to the baseline (with Local Plan) scenario. This would cause interaction with the Ramsgate Road / College Road / A254 / Beatrice Road junction to the north, which is unacceptable to KCC.</i>  <i>It is also relevant to note that this mitigation solution could not be implemented until other development sites were delivered as it relies on other road link infrastructure being in place to enable the Nash Road arm of this junction to be closed as traffic will need to reroute between Nash Road and Manston Road.”</i></p> <p>i. What is the Applicant’s response?</p> <p>The appendices supporting the Applicant’s response to Second Written Questions at Appendix Tr.2.57 [REP6-index number to be allocated] includes a Stage 1 Safety Audit of the junction.</p> <p>ii. Is KCC content with its findings and the design response?  iii. Can the recommendations be suitably addressed and delivered during the detailed design stage?</p>	<p>ii) KCC is not satisfied with the Designer’s Response, in that the requested swept path analysis for HGVs has not been provided to address the Auditor’s request.</p> <p>iii) The above issue is not considered capable of being addressed at the detailed design stage, as it may require a significant revision of the mitigation scheme, potentially requiring land outside of the highway boundary.</p>
<p>TR.3.30</p>	<p>Junction 16</p> <p>KCC’s response to second written question Tr.2.43 [REP6-index number to be allocated] states:  <i>“...the proposed mitigation for the Ramsgate Road / College Road / A254 / Beatrice Road junction would appear to result in a highly unconventional junction layout, which is unlikely to be acceptable to KCC, not least due to the lack of intervisibility between the stop lines.”</i></p> <p>i. What is the Applicant’s response?</p> <p>The appendices supporting the Applicant’s response to Second Written Questions at Appendix Tr.2.57 [REP6-index number to be allocated] include a Stage 1 Safety Audit of the junction.</p> <p>ii. Is KCC content with its findings and the design response?  iii. Can the recommendations be suitably addressed and delivered during the detailed design stage?</p>	<p>ii) KCC is not content with the findings of the Safety Audit, in that it has not identified the unconventional nature of the proposed junction layout and the lack of intervisibility between stop lines as potential hazards.</p> <p>iii) The above issues are not considered capable of being addressed at the detailed design stage, as they may require a significant revision of the mitigation scheme, potentially requiring land outside of the highway boundary.</p>
<p>TR.3.33</p>	<p>Off-Site Infrastructure Improvements</p> <p>KCC set out in their LIR [REP3-143] at Paragraph 4.1.24:  <i>“Whilst the proposal to include 2.0m footways along the widened sections of Spitfire Way and Manston Road is welcome in principle, it is important that continuous and direct walking routes to local trip generators are provided where possible. It is notable in this</i></p>	<p>KCC does not accept this statement. Manston has in excess of 1,000 residents and is situated within a close walking distance of the site. As such, it is considered vital that continuous and safe pedestrian infrastructure is provided in order to encourage non-car travel by staff in particular, in accordance with local and national planning policy.</p>

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	<p><i>respect that it is not proposed to provide such routes to local residential areas (notably Manston village), which is considered necessary in order to promote sustainable transport accessibility to the site by staff in particular. This could further encourage inappropriate pedestrian activity within the carriageway to the detriment of highway safety.”</i></p> <p>The Applicant’s response to second written question Tr.2.45 [REP6-index number to be allocated] states:  <i>“The Applicant has given consideration to the need for footways. It concluded that these were not required. Manston Village is a small settlement and is unlikely to generate significant numbers, if any pedestrian trips to Manston Airport.”</i>                  Is this accepted by KCC?</p>	<p>This issue is further compounded by the significant increase in forecast traffic flow through the village as indicated in question TR.3.15 above, which has the potential to increase pedestrian and vehicle conflict / interaction.</p>
TR.3.34	<p>Emergency Access Points</p> <p>The appendices to the Applicant’s response to second written question (Appendix TR.2.47) [REP6-index number to be allocated] sets out indicative access points.</p> <p>Is KCC content with their locations?</p>	<p>This is the first occasion that these indicative access points have been presented to KCC and it is necessary for the applicant to set out a justification/rationale for their positioning and operation. At this stage, these junctions should be appropriately detailed and assessed, with general arrangement being identified and Stage 1 Road Safety Audits being provided, so that the suitability of the locations suggested can be fully appraised.</p>
TR.3.37	<p>Strategic Highway Network</p> <p>The Applicant’s response to second written question Tr.2.51 [REP6-index number to be allocated] sets out that trips from Medway local authority area should have been included in Table 8.2 of the RTA [REP5-021] and provides a new table showing distribution from West Kent.</p> <p>Do Highways England and KCC agree with the revisions to the distribution?</p>	<p>KCC is in agreement with the revisions to the distribution.</p>
TR.3.38	<p>Strategic Highway Network</p> <p>An Interested Party [REP3-152] raised the following concern:  <i>“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.”</i></p> <p>The Applicant’s response to this as part of the second written question Tr.2.51 [REP6-index number to be allocated] states:  <i>“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>Do HE and KCC agree with the Applicant’s statement?</p>	<p>KCC is in agreement with this statement. Whilst it is considered likely that a proportion of trips to/from Swale District would be made via M2 Junction 5 and the A249 corridor, they would be relatively small in number and as these roads are managed by Highways England, this is primarily a matter for Highways England to comment on.</p>
Tr.3.39	<p>Strategic Highway Network</p> <p>An Interested Party [REP3-152] raised the following concern:  <i>“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.</i></p> <p><i>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.”</i></p> <p>The Applicant’s response to this as part of the second written question Tr.2.52 [REP6-index number to be allocated] states:  <i>“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.</i></p> <p><i>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.”</i></p> <p>Do HE and KCC agree with the Applicant’s view?</p>	<p>These matters have been the subject of prior discussion between the applicant’s consultants and KCC and are now agreed.</p>
TR.3.40	<p>Strategic Highway Network</p>	<p>KCC agrees with the summary provided by the applicant in relation to future</p>

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<p>An Interested Party [REP3-152] has raised the following concern:</p> <p><i>“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.”</i></p> <p>The Applicant’s response to this as part of the second written question Tr.2.53 [REP6-index number to be allocated] states:</p> <p><i>“The TA addendum [REP-5-021] is based on the TSTM which includes all committed development, as well as the draft Local Plan growth. This does not include the resumption of ferry services at Ramsgate port. As identified in paragraph 2.3.8 of the KCC transport evidence base document for the draft Thanet Local Plan, “Forecasting Report - Thanet Local Plan Evidence Base”, CO04300697/001 Revision 01, July 2018, TEMPRO 7 (Dataset 72) was used to determine forecast growth for the external zones of the A28 (towards Canterbury District), A299 (towards Canterbury District and M2), and the A256 (towards Dover district). The uplift extracted from TEMPRO was approximately 13%. Growth from other districts has therefore been accounted for.”</i></p> <p>i. Do KCC agree with this view?</p> <p>ii. Is it feasible to include HGVs associated with the resumption of ferry services at Ramsgate port in the modelling?</p> <p>iii. If so, is this likely to materially affect the transport assessment?</p>	<p>growth forecasts using TEMPro.</p> <p>Whilst it is accepted that there is scope for recommencement of ferry services / freight activities at Ramsgate Port, in the absence of historic traffic information from Thanet District Council (the current owners / operator of the port), the potential traffic impact from this is difficult to accurately forecast.</p> <p>It may be possible for the applicant to apply a high-level ‘port sensitivity test’ to forecast traffic flows, by identifying current annual port peak vehicle handling capacity and applying an even distribution of traffic movements across the year (assuming reasonable operating hours), however this would not necessarily provide an accurate dataset with which to draw reasonable conclusions. For example, it is possible that for commercial reasons, future ferry scheduling could be coordinated to avoid local network traffic peaks to ensure efficient arrival and departure of freight and passengers. This could be managed through an appropriate Port Management Strategy.</p> <p>It is possible that any significant development at the Port could also require its own additional planning consent, at which point a suitable first principles assessment of traffic impact would be required, and relevant mitigation explored (if / where necessary).</p> <p>On balance, given the level of growth that has been forecast within the future year network assumptions, (which in turn assumes that use of private motor vehicles will continue at current levels with no reduction from sustainable transport initiatives and travel planning) the forecasts contained within the TSTM are likely to represent a robust picture of future traffic conditions in the locality, when complimented by TEMPro growth (as outlined by the applicant).</p>
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