

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

UPDATED Representation from J.D.I. Baker for Hearing on 6 June 2019

My reference: 20014834

1. I have considered the Revised Transport Assessment (“RTA”) (TR020002/D5/TA2) dated 05 April 2019, which updates the original TA at Volume 15 of the Environmental Statement. My principal concern remains the impacts on the strategic road network, specifically the M2.
2. Impact on the M2 is also an issue which concerns Canterbury City Council (see its Local Impact Report).
3. I continue to have **grave concerns about the Passenger Trips Distribution in Table 8.2 of the RTA**. I have made some progress in understanding these, by reference to RTA para. 4.7.9, which sets out the basis purportedly used to establish Passenger Trips Distribution.
4. From para. 4.7.9 is derived the 7.5% trips to “London via A2” on the top row of Table 8.2, which is thus justified. And the “12.5% to West Kent” from para. 4.7.9 corresponds exactly to the total of the percentages given in Table 8.2 for Maidstone, Tunbridge [presumably Wells], Tonbridge, Gravesend, Dartford and Sevenoaks.
5. The total trips in Table 8.2 using the M2 is the above 7.5% + 12.5% = 20%, plus 2.9% to Ashford and 7.6% to Swale = total 30.5%.
6. However, the key error is **the omission from Table 8.2 of the 30% trips to Mid Kent** from para. 4.7.9. These trips have just disappeared!
7. On 15 February 2019, I submitted in my Written Representation that the previous version of Table 8.2 omitted all trips from the Medway local authority area (which has a greater population than any other local authority area in Kent). The Applicant has obviously not read my Written Representation, as it has not rectified this and the revised Table 8.2 in the RTA contains the same error.
8. I presume that the 30% of trips to Mid Kent in para. 4.7.9 corresponds to the trips to Medway. Therefore, “Medway 30% A299-M2-A229” should appear as an extra row in Table 8.2.
9. This would have the effect of **virtually doubling the trips entering the M2 at Brenley Corner, from 30.5% to 60.5%**. This is a very significant impact and it **requires the assessment to be redone** from that point.
10. Figures 8.1 and 8.2 are wrong for this reason. The conclusion about Brenley Corner in para. 8.3.9 of the RTA is also wrong, and cannot be justified on the basis of the figures presented.
11. The M2 west of Brenley Corner is subject to significant eastbound queueing to exit at the junction, which regularly obstructs the motorway in a dangerous manner, and not infrequently holds up main-line “through” traffic as well, as vehicles seeking to exit try to get into the inside running lane to queue but cannot do so immediately, resulting in

blocking the outside running lane. For this reason, the increased flows along the M2 are of serious concern.

12. The consequence of the above is also that **the daily traffic impact on the M2 itself is significantly greater than that set out in Table 8.8 of the original TA.**
13. **This is compounded** by the erroneous assumption in Table 8.2 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.
14. 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.
15. For all the above reasons, **the additional traffic using the M2, especially the two-lane section between junctions 5 and 7, has been approximately halved in the assessment work reported in the RTA.**
16. As a result, Figures 8.1 – 8.2 are also wrong . (It is very noticeable that, as per para. 8 above, these show no traffic leaving the M2 towards Medway, along the A278, A229 or A228, which is irrational and unjustified).
17. 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 over that time.
18. 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.
19. It is wrong for the original TA, therefore, to assert that its (vastly 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 and the RTA amended as set out above..

J.D.I. Baker.
Canterbury, Kent.
5 June 2019.