

EX083 – Statement of Common Ground – Folkestone & Hythe District Council/Highways England

The Statement of Common Ground updates progress in terms of the more detailed modelling that has been undertaken since the EIP hearing sessions were suspended at the beginning of the year, paragraph 5.2 states that: “the following provides the updated picture junction by junction, noting what is agreed, what is still outstanding but will hopefully be fully concluded and agreed by the time of the intended CSR Examination sessions on transport on 29 and/or 30 June 2021.”

It is disappointing that matters are still outstanding and that third parties have no opportunity to comment on the complete and ultimately agreed matters prior to the resumed hearings. Stating that *hopefully* outstanding matters will be concluded by the time the sessions on transport recommence isn't particularly helpful. Third parties have been given less than two weeks to consider this latest, extensive material. Although described as 'updated', unless we are mistaken, this transport modelling has never before been made public so we are coming to it without the benefit of sight of the earlier drafts. We stand to have even less time to review what may emerge in the remaining two weeks before the resumption of the hearings or at the hearings themselves.

CPRE the Countryside Charity supports all policies which potentially reduce the need for motorised travel, whether or not using low-carbon energy. The carbon cost of vehicle production and the particulates emitted from vehicle tyres and brakes, for example, are continuing causes for concern even if the move towards electric vehicles is successful. We would therefore hope that the forecasts for vehicle trip growth implied by traditional traffic forecasting methods will, with changes in people's perception of the need for travel, prove to be over-estimates. Given current attitudes towards commuting, it would be wasteful to provide additional infrastructure which is ultimately not needed or needed at a much later date. In the context of this examination, where the subject highway 'improvements' stand to be funded by the council-owned Otterpool Park development, the money that would be needed would be better used elsewhere for the public good.

As far as we can understand it, the proposed 'monitor and manage' approach seems preferable to what is described as the traditional 'predict and provide' approach. This is especially so given the time horizon of the Otterpool Park development. We support the change of emphasis as proposed by the consultants in Appendix 9 to the SoCG at 11.3.

It is not yet clear, however, how 'monitor and manage' will work in practice. The documents drafted by WSP in the appendices to the SoCG explain what might be involved in monitoring, albeit only for Otterpool Park, it seems. Will the same regime apply to the network outside Otterpool Park? Then what options are available for 'management'? EX079 proposes at 4.196 only unspecified 'traffic calming measures' which don't seem appropriate in the context of the SRN. Appendix 11 to the SoCG purports to set out a 'monitor and manage' framework but implies no flexibility of options other than adjustments to the programme based on the Otterpool Park build-out rate. Nevertheless, taking the traditional approach when assessing the viability of the plan should represent a worst case. Can the Council confirm that these worst case costs are indeed

included in the viability assessments and in EX069 Infrastructure Costs? That is, they are not relying on unspecified savings emerging from this monitor and manage approach to make ends meet.

The subject SoCG covers the infrastructure managed by Highways England but touches on the locally extremely important issue of congestion on the A20 through Sellindge and Otterpool Park when traffic is diverted from the M20. We read at para 5.4 of the SoCG that a sensitivity test (model) has been carried out for closure of Junction 11 eastbound off-slip but we could not find any reference to that in Appendix 9 as claimed in the SoCG. There is a top-level investigation presented in Appendix 18 but no modelling work. It is not clear whether Highways England find Appendix 18 satisfactory or are expecting a more detailed study. It is not mentioned at 1.4 in Appendix 21, HE's Summary Note.

Appendix 18, if we have understood it correctly, tells us there may well be an unsatisfactory situation now (depending on how vehicles actually divert) and that there will definitely be an unsatisfactory situation at some point in the future. The residents of Sellindge will tell you it is an issue right now. Congestion through Sellindge happens too frequently for whatever reason and it's difficult to believe that a few loops in the road will solve the problem. Those who use the A20 to get to work, visit school or the doctor's deserve better answers although as an existing issue it's not clear why it should be for the Council to investigate.

The effects of closure of the eastbound off-slip at Junction 11 are minor in comparison with what happens when the M20 is closed completely in either direction so that all motorway traffic is diverted along the A20. If it is accepted that the Council have some responsibility to consider the effect of diversions from other parts of the network, for reasons they have no control over, why has this case not been considered?

Section 7 of the SoCG covers various initiatives regarding active travel which will, hopefully, have a positive impact on the demand for motorised trips. CPRE Kent supports wholeheartedly the emphasis on walking and cycling. Given this, it is disappointing that we could find nothing in the plan concerning opening up safe, cyclable routes between the Otterpool Park area and the nearest secondary school in Saltwood or providing a viable and safe alternative for cyclists to the A261 between Newingreen and Hythe. Can the Council confirm that the cost of these can be accommodated without significant impact on the viability of its plan?

With regard to junction 11 of the M20 it is noted that the signatories agree that the CSR/Otterpool will have an impact that needs to be mitigated.

We have not taken expert advice on the proposals presented in Appendix 22 but are concerned that the proposed lane drop/gain solution may have unintended consequences for road safety. Our members have often observed driver confusion at the lane drop at J12 coastbound which results in last-minute lane changes, especially by foreign registered vehicles. Similarly, there is confusion by many drivers at the (recently introduced) lane gain at J12 westbound, but with less of a safety implication. Introducing another lane drop/gain a few miles west seems likely to cause more confusion especially to drivers leaving the ports who may have never driven in the country before. We think these changes to the main carriageway should be implemented only if absolutely necessary and delayed as long as possible.

We were alarmed to see a suggestion that the accommodation bridge connecting the two parts of Stanford, north and south of the motorway, could be removed and not even replaced by a footbridge to carry the existing PROW. We trust no further consideration will be given to that option without full consultation.

Delaying specifics of the mitigation until planning application stage adds uncertainty to the Core Strategy Review and threatens its soundness. Will the necessary upgrades to the traffic signals and installation of a 'loop queue detention' [sic] to better manage flows at the A20 Sellindge railway bridge signals have implications in terms of land take and viability of the scheme? Have these costs been factored into EX069 (New Garden Settlement Infrastructure Costs)?

It is noted that the signatories agree that the CSR/Otterpool will impact on junctions 12 and 13 of the M20 and that impact needs to be mitigated.

Paragraph 5.10 advises that "the correct drawings are currently being produced by Arcadis" for the Council. Not having this information included in the SoCG makes it difficult to engage effectively in terms of the appropriateness of the proposed mitigation and the soundness of the plan in this respect.

CPRE Kent is also concerned with the statement at the end of paragraph 5.10 that says: "at the time of writing, and at the request of HE, further work to progress scheme design, technical modelling and scheme costing of the above arrangements is being undertaken by Arcadis. Similarly, discussions concerning funding arrangements to deliver the required scheme of mitigation are evolving, but there is sufficient confidence that these works can be funded through the monitor and manage approach and at no cost to HE or Kent County highways."

The concept of the 'monitor and manage approach' isn't explained in the SoCG, other than to say at paragraph 6.8 that work on the Monitor and Manage Framework continues.

CPRE Kent queries whether this reference to the monitor and manage approach is the same as the action-response criteria referred to in the proposed modifications in EX079 (New Garden Settlement - Policies SS6 to SS9) at new paragraph 4.196, whereby if traffic is above predicted levels the developer will pay for traffic calming. As noted above, we would suppose 'monitor and manage' and the available responses should monitoring data diverge from predictions will be very different in the context of the SRN from that of the local road network. And yet, interventions on the one network will impact the other. Is there agreement between HE and KCC as to how this is will work?

We question whether traffic calming will be sufficient to mitigate the impacts of development at Otterpool. Traffic calming cannot in general be expected to 'bring traffic volumes down'. It will have an impact at local level where there is an alternative, faster route and we support the recent ideas for discouraging HGV through traffic in the Otterpool Park Town Centre as proposed by the developer¹. But traffic calming is unlikely to mitigate any impacts on the SRN. On the other hand, the proposed dualling of the A20 between J11 and Newingreen will affect Junction 11 and its sister roundabout south of the railway. Both HE and KCC need to be involved in that. In passing, we would say that proposal makes no sense as it would have the opposite effect to traffic calming

¹ <https://phaseone.otterpoolpark.org/>

measures.

To summarise, outstanding matters are still awaited in the form of:

- technical modelling and drawings
- costings; and
- funding arrangements in respect of mitigation at junction 12 and 13 of the M20..

It is noted that the signatories agree that the CSR/Otterpool will impact on the A20/A260 junctions and that impact needs to be mitigated.

Will the proposed mitigation require additional land take? And what will be the implications for the viability of Otterpool?

In conclusion, CPRE Kent remains disappointed that despite the passage of a considerable period of time documentation of what has actually been agreed between the Council and Highways England in terms of the mitigation of transport impacts arising from the revision to the Core Strategy remains incomplete.