

The Secretary of State  
National Transport Casework Team  
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Please ask for: Michael Jessop  
Our Ref: EDC/19/0031

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Sent by email only to:  
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Dear Sir/Madam

**A2 Bean and Ebbsfleet Junction Improvements - Publication of Orders under the Highways Act 1980 - Consultation**

I write in response to the above consultation in respect of the proposed A2 Bean and Ebbsfleet Junction improvement scheme by Highways England (HE). This response is provided by the Ebbsfleet Development Corporation (EDC) in its role as Local Planning Authority (LPA).

EDC firmly supports the principle of improving the existing junctions as the provision of sufficient capacity at the A2 Bean and Ebbsfleet road junctions is essential to development of the Ebbsfleet Garden City and wider growth in the area. The commitment to deliver these improvements is welcomed and would support and provide confidence to developers to continue to invest in and build in the area as well as provide reassurance to local residents and businesses concerned with road congestion and associated adverse traffic impacts. As such, EDC support measures to expedite delivery of the planned junction improvements.

Following confirmation of a change in the consenting process, it is acknowledged that the proposed works would be carried out under permitted development rights available to HE. It is also acknowledged that the requisite Compulsory Purchase Order and Side Road Order has been made, along with the relevant Highways Orders.

No details have been made publicly available in respect of forecast traffic flows and junction design considerations, or how traffic movements associated with the nearby Bluewater Shopping Centre have been accounted for in the modelling. However, EDC are content to defer to Kent County Council in its role as the Local Highway Authority for advice on such matters, who have confirmed they will be making a representation directly to the Secretary of State. EDC would expect that the transport details provided satisfactorily demonstrate that the scheme would achieve the principal scheme objectives and that the design builds in sufficient long term road capacity and resilience.

The supporting Environmental Statement (ES) indicates that environmental mitigation is embedded into the scheme principally by focussing works on the existing route of the A2 and slip roads to minimise the land take required. It is acknowledged that this now avoids encroachment into the ancient woodland at Bean.

Whilst planting details are limited at this stage, the visual and ecological mitigation proposed through new landscaping and habitat creation is supported in principle. The type and form of planting should reflect the character of each junction and, especially where providing mitigation for air quality, noise and/or visual amenity, should be planted at a mature size. The principle of advanced planting is welcomed and it is noted that the Outline Environmental Management Plan (OEMP) commits to provision of habitat creation pre-construction. It is essential that arrangements are put in place for its long-term management and maintenance, and that account be taken of climate change in selecting species.

The construction compound proposed to the south of the A2 Ebbsfleet junction will be prominent in views by motorists using the slip roads, so should be sensitively enclosed. EDC are disappointed that the former petrol filling station site to the south of the Ebbsfleet East roundabout is not proposed for acquisition and incorporation into the scheme as, as previously discussed with HE, it would present opportunities to mitigate the visual impact of the enlarged road environment and enhance the setting of this gateway junction into the Ebbsfleet Garden City.

Whilst EDC support measures to expedite delivery, the ES indicates that night time construction noise cannot fully mitigate disturbance to nearby residents so it is necessary that overnight working is restricted to essential works only. Proposed new and replacement noise barriers, and retaining structures (particularly where prominently sited and where limited space prevents landscaped screening) should be designed to be sympathetic to their surroundings. EDC support ideas being explored by HE for enhancing the visual appearance of the noise barrier fronting Hope Cottages through their separate Designated Funds programme, and for advanced installation to mitigate construction impacts, but consider that the base design should adequately mitigate its impact.

The proposed scheme has been informed by stakeholder engagement in particular respect of improving existing pedestrian and cycle connections that are important to reduce the severance effect of the A2 and associated junctions, which is welcomed. However, the scheme does not include a signalised crossing on the northern arm of the B255/A296 roundabout, which has previously been discussed between HE and EDC as being necessary to provide a link for National Cycle Route 1 and is identified as a necessary intervention within the EDC's strategy for environmental improvements at the Bean Triangle that was developed alongside HE. Also, as existing routes will be disrupted during construction it is considered necessary to ensure that clearly signed diversions are in place and that a good level of community engagement is provided throughout.

The ES and OEMP refer to implementation of various documents to establish the detailed mitigation measures and subsequent ongoing management such as that relating to construction management, habitat management, archaeology and landscaping. Whilst the consenting regime does not include a process requiring formal approval of such documents, it is considered that they should be developed in consultation with the local authorities and the development corporation. This is reinforced by comments provided by Kent County Council relating to the need for additional archaeological investigation and specific requirements for ecological mitigation that it is considered should be subject to independent specialist review to ensure proposals are suitably robust and that mitigation is appropriate. Recent confirmation that HE wish to agree Statements of Common Ground with relevant parties provides some reassurance regarding a mechanism for ongoing engagement on such details, which is welcomed. In addition, it is necessary to ensure mechanisms are in place to require implementation of the proposed mitigation measures at the appropriate stage.

Finally, acknowledging that the proposed scheme is predicted to directly and indirectly stimulate the local economy both during construction and once complete, EDC would expect the scheme to maximise local employment and training opportunities during construction.

Yours sincerely

**Mark Pullin**  
Chief Planning Officer