

**From:** [Jacqueline Aggiss](mailto:Jacqueline.Aggiss@highwaysengland.co.uk)  
**To:** [David.Bowie@highwaysengland.co.uk](mailto:David.Bowie@highwaysengland.co.uk)  
**Cc:** [Kevin.Bown@highwaysengland.co.uk](mailto:Kevin.Bown@highwaysengland.co.uk); [Alistair.Bradley@highwaysengland.co.uk](mailto:Alistair.Bradley@highwaysengland.co.uk); [Simon Tucker](mailto:Simon.Tucker@highwaysengland.co.uk); [Duncan Parr](mailto:Duncan.Parr@rapleys.com); [Michael Birch](mailto:Michael.Birch@rapleys.com)  
**Subject:** MC/19/1566 - Land Off Pump Lane, Rainham, Kent, ME8 7TJ  
**Date:** 30 April 2020 16:19:33  
**Attachments:** [image001.jpg](#)  
[image004.jpg](#)  
[HE summary note.pdf](#)  
[Journey to Work Distribution.xlsx](#)  
[Additional info for HE.PDF](#)

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David,

I refer to your email below with further comments.

Please find attached a summary which lists various matters together with additional information, as follows:

Journey to work distribution spreadsheet: this sets out the mode share data proportions and how we have arrived at the traffic distribution on the strategic network.

Additional information, comprising:

- a. TEMPRO growth factors for Medway, in whole
- b. TEMPRO growth factors for Medway 018
- c. Medway draft response
- d. DTA Meeting notes with Medway
- e. Medway Middle Super Output Area Locations

We have cross-referred the numbers set out (in green) within the summary, throughout the email below (also in green), for your ease of reference.

We trust that this further information adequately addresses your comments raised.

Please may we arrange a meeting to discuss this further, at your earliest convenience. We have availability on 11th May (AM) or anytime on 12th through to 15th May (inclusive). Kindly please confirm which day would suit you best?

Thanks.

Regards,

Jacqueline Aggiss

**David Tucker Associates**

Transport Planning Consultants

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Forester House, Doctors Lane, Henley in Arden, Warwickshire B95 5AW

Tel: +44(0)1564 793598

Fax: +44(0)1564 793983

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**From:** Bowie, David [<mailto:David.Bowie@highwaysengland.co.uk>]

**Sent:** 23 April 2020 11:38

**To:** gunner, hannah <[hannah.gunner@medway.gov.uk](mailto:hannah.gunner@medway.gov.uk)>

**Cc:** Planning SE <[planningse@highwaysengland.co.uk](mailto:planningse@highwaysengland.co.uk)>; Bown, Kevin

<[Kevin.Bown@highwaysengland.co.uk](mailto:Kevin.Bown@highwaysengland.co.uk)>; Bradley, Alistair

<[Alistair.Bradley@highwaysengland.co.uk](mailto:Alistair.Bradley@highwaysengland.co.uk)>; Jacqueline Aggiss

<[JA@dtatransportation.co.uk](mailto:JA@dtatransportation.co.uk)>; Simon Tucker <[sjt@dtatransportation.co.uk](mailto:sjt@dtatransportation.co.uk)>;

[Michael.Birch@rapleys.com](mailto:Michael.Birch@rapleys.com); [Duncan.Parr@rapleys.com](mailto:Duncan.Parr@rapleys.com)

**Subject:** MC/19/1566 - Land Off Pump Lane, Rainham, Kent, ME8 7TJ

|                          |                                                                                                                                                                                     |
|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>For attention of:</b> | Hannah Gunner, Medway Council                                                                                                                                                       |
| <b>Site:</b>             | Land Off Pump Lane, Rainham, Kent, ME8 7TJ                                                                                                                                          |
| <b>Proposal:</b>         | residential development comprising approximately 1,250 residential units, a local centre, a village green, a two-form entry primary school, a 60-bed extra care facility, an 80-bed |

|                                      |                                                                 |
|--------------------------------------|-----------------------------------------------------------------|
|                                      | care home and associated access (vehicular, pedestrian, cycle). |
| <b>Your Reference:</b>               | MC/19/1566                                                      |
| <b>Highways England's Reference:</b> | 85118 #8020                                                     |

Dear Hannah,

Further to our response to the above application dated 31 October 2019, we have received a response directly from the applicant's agent on 2 April 2020, which was also copied to Medway Council Planning.

Highways England ("we") have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and are the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN. In this case our interest relates to the M2, and potentially the A2, A249 and M20.

We understand that the proposal/site is **not** in the Medway Local Plan 2003.

The emerging Medway Local Plan for 2019 to 2037 is still being developed. It is not clear if the site will be part of the new emerging Medway Local Plan for 2018 to 2035.

We have therefore assessed the site on the following basis in accordance with NPPF, C2/13 and the Highways England guidance on working with applicants.

## History of the Proposal

Initially, we reviewed the following document related to this application and responded on 17 July 2019:

- David Tucker Associates, 21 March 2019, *Land at Pump Farm and Bloors Farm, Lower Rainham, Final Transport Assessment* ("the TA").

We then received the following document, which we reviewed in our response of 31 October 2019:

- David Tucker Associates, 14 August 2019, *Land at Pump Farm and Bloors Farm, Lower Rainham, Response to Highways England* ("the August 2019 submission").

Subsequently, we received the following document on 2 April 2020, which we review in this current response:

- David Tucker Associates, 5 March 2020, *Land at Pump Farm and Bloors Farm, Lower Rainham, Second Response to Highways England* ("the March 2020 submission").

### Review of the March 2020 Submission

I refer to our previous response of 31 October which has resulted in the March 2020 submission from David Tucker Associates. Our response to that March 2020 submission is only where I consider that our original concerns/requests have not been adequately addressed and therefore remain issues of concern.

For ease of reference, the following comments in this section are colour-coded as follows:

- Our 31 October 2019 response text in black;
- The applicant's March 2020 submission in blue; and
- Our updated response in red.
- Summary points referred in green.

### **Base traffic volumes and growth**

We previously commented as follows:

- The TA has no details of base traffic data for the SRN;
- TEMPRO growth factors have only been determined for urban roads, not strategic roads,
- TEMPRO output needs to be provided so we can verify if the selection parameters are accurate.
- For base and future traffic volumes on the SRN, use of the Medway Local Plan Traffic Modelling may be appropriate. This is still under development; please see further comments below under "Modelling".

The August 2019 submission responded to this as follows:

- The TA included forecast development traffic on the SRN at junctions 1, 3 and 4 of the M2.
- The *"impact of the proposals on base traffic levels on the M2 will be indiscernible"*.
- The DfT website provided base flow data on the M2 within the vicinity of junctions 2, 3 and 4 shows an annual average daily flow of in the region of 70,000 and 100,000 vehicles.
- If TEMPRO factors are applied this will reduce the percentage impact of development traffic.
- *"On the basis of the forecast traffic impact on the SRN, full modelling of individual junctions is not warranted, and therefore TEMPRO factors are not necessary"*.
- For completeness, 10-year growth factors for Medway 018 (selecting urban and trunk roads) are 1.1156 for the AM peak and 1.1185 for the PM peak.

In response, we commented as follows:

- As noted further below in this response, for various reasons we cannot yet be confident that the *"impact of the proposals on base traffic levels on the M2 will be indiscernible"*.
- ***Furthermore, junction 2 may be impacted also.***
- ***See comments below regarding TEMPRO also.***
- If we reach agreement on the other parameters of this assessment, it should

be noted that ***a reduced percentage impact of the development traffic, due to background traffic growth, is not necessarily an acceptable argument against further assessment.*** Where there is existing congestion, a small proportional impact can make a large difference, as a small volume of traffic would consume a large proportion of any available capacity (if any capacity is available).

- ***Our previous comments therefore still apply.***

The March 2020 submission responds as follows:

- Table 1 replicates the development trips on the SRN as given previously (in the August 2019 submission);
- It then states that the “*proposed impact will be a maximum of 2 vehicles per minute on any given approach which cannot be considered to be material in the context of the operation of the motorway junctions*”.
- It also states that “*it is unlikely that Junction 2 of the M2 will be impacted as the main destinations would preclude the use of this junction*”.

Our updated response is as follows:

- Please also see our other comments further below regarding growth, trip generation and distribution.
- Even if we assume the Table 1 development trips to be accurate, the impact *on any given approach* would be up to one vehicle every two minutes (correcting this error in the March 2020 submission actually improves the situation); however, the impact within the junctions would be higher. Traffic from the different approaches interacts within the junctions, so we need to consider the combined volumes as well as the link volumes.
- The assumption that these volumes “*cannot be considered to be material*” needs to be supported with evidence, for the volumes on the links and within the junctions. Such volumes may seem small but – as mentioned before – where there is existing congestion, a small proportional impact can make a large difference, as a small volume of traffic would consume a large proportion of any available capacity (if any capacity is available). Our view is that any impact on a severely congested network is in itself severe as the additional traffic will only serve to increase vehicle delay, journey times and queue lengths.
- The current Medway modelling is showing need for mitigation at all SRN junctions; this development – which is outside the Local Plan – then further adds to this, so we still need to understand more fully the impact of this traffic. **Refer to number 11**
- If we permitted every development that adds a “small, immaterial” amount of traffic to a junction, these all add up; as is demonstrated by the need for mitigation even before this development’s traffic is added.
- The assumption that Junction 2 would not be impacted needs further supporting evidence; the comment in the submission is essentially anecdotal and is not accepted. **Refer to number 12**
- While an assessment *might* potentially demonstrate that our concerns are unfounded (or relatively less of a concern than we thought), we need to see such an assessment in order to decide on this. **Therefore, all our previous comments still apply.**

**Committed developments**

We previously commented as follows:

- We requested that Medway Council confirm, or otherwise, that the list of committed developments in Paragraph 6.1.3 of the TA is complete and that the stated development types and quantum are correct?
- As noted above, we need some details of the TEMPRO growth for the SRN in order to determine their accuracy and also then to assess the validity of the point in paragraphs 6.1.4 and 6.1.5 of the TA, i.e. the assertion that no account needs to be made of the committed development traffic because TEMPRO growth already accounts for a greater level of growth.
- Also, as noted above, use of the Medway Local Plan Traffic Modelling may be appropriate once agreed and finalised with the council.

The August 2019 submission responded to this as follows:

- A response is awaited from Medway Council in respect of the TA which will confirm the position in respect of committed development.
- Within the TA, the committed development sites were reviewed within the immediate vicinity and total around 900 dwellings. The extent of additional housing growth included within TEMPRO for Medway is for 11,380 households. This is significantly higher than the committed development quantum and therefore no further uplift is required.

In response, we commented as follows:

- We agree with the general principle that TEMPRO growth can subsume committed development traffic. ***However, in this particular case we cannot be certain that this applies until we review the TEMPRO output (as previously requested), so we can verify if the selection parameters are accurate, in particular the study area extent (and potentially other parameters). Also, the growth factors for SRN and urban roads separately should be provided.***
- ***As before, we also request confirmation from Medway Council that the list of committed developments in Paragraph 6.1.3 of the TA is complete and that the stated development types and quantum are correct.***

The March 2020 submission responds as follows:

- The TEMPRO growth factors are set out in Table 2 for these parameters:
  - Trunk road;
  - Urban roads;
  - Car driver;
  - Medway 018 study area;
  - 2019-2029;
  - Using TEMPRO7.2 and the NTM AF15 Dataset.
- The submission also states that “Medway Council have confirmed in a meeting on 28th October 2019 that the list of committed developments in the TA are appropriate.”

Our updated response is as follows:

- Our own TEMPRO query using the above parameters produced quite different results; we need to see a screenshot of the above TEMPRO query, to verify the results of the March 2020 submission. Refer to number 5
- A screenshot of our own TEMPRO query for the PM peak is shown below:

A screenshot of a computer   Description automatically generated



- The Medway 018 study area is a very small local area around the development site, as shown in this link: <http://statistics.data.gov.uk/atlas/resource?uri=http://statistics.data.gov.uk/id/statistical-geography/E02003331>
- As we are concerned with the *background* traffic on the SRN, it would be appropriate to expand the study area further. Refer to number 4
- We ask that Medway Council confirm the statement that they “*have confirmed in a meeting on 28th October 2019 that the list of committed developments in the TA are appropriate.*” Refer to number 6

### Development trip generation

We previously commented as follows:

- The residential trip generation is determined in the TA by:
  - TRICS *person* trip rates; National Travel Survey (NTS) data to determine percentages of AM and PM peak trip for each purpose; Census 2011 Journey to Work Statistics for Middle Super Output Area Medway 018, to determine mode share for each journey purpose separately.
  - A degree of internalisation is applied to the residential trips, as described in section 5.9 and the resulting external residential trips are then summarised in Table 31.
- The care facilities trip generation is determined in the TA by TRICS vehicle trip rates.
- We requested the NTS data and Census 2011 Journey to Work Statistics, to

verify the quoted percentages.

- The NTS data in Table 17 (journey purpose splits) could vary across locations.
- We requested details of the geographical extent of the Middle Super Output Area Medway 018, used to determine mode share. If this includes locations with much better access to non-car transport than the proposal site, then this could be under-estimating the probable car mode share of the proposal.
- Use of TRICS *vehicle* trip rates, with careful selection of TRICS sites based on similar characteristics to the proposal site, may be more accurate and should at least be used for comparison. These similar characteristics should include on- and off-street parking provision; non-car transport provision; local population, vehicle ownership, location type, as well as the age of the surveys and sample sizes.

The August 2019 submission responded to this as follows:

- NTS data and Census 2011 Journey-to-Work data are provided in Appendix B of the August 2019 submission.
- NTS data is *“based on national figures and no equivalent dataset is available for specific regions”*.
- The development trips on the SRN are limited to commuting and business trips on the basis that trips associated with other trip purposes will be local to the site.
- The numbers of commuting and business trips are summarised in the August 2019 submission in the table under paragraph 4.2 (which is also Table 47 of the TA). These are determined from the data in Appendix B, which also includes assessment of traffic distribution.
- The extent of the MSOA for Medway 018 is illustrated in Image 1 in the August 2019 submission. *“The area included is immediately adjacent to the proposed site and includes the built up residential area immediately to the south”*.

In response, we commented as follows:

- We have reviewed the NTS 0502 data in Appendix B of the August 2019 submission and checked it against the Table 17 of the TA. While the combined proportions of commuting and business trips are correctly recorded in Table 17 for the periods 8 to 9am (24%) and 5 to 6pm (37%), these may not necessarily be the peak hours on the SRN. The period 7 to 8am could feasibly be very busy also; and in this period, the NTS data show that combined proportions of commuting and business trips are 56%, i.e. over twice as much. Therefore, application of this methodology could more than double the number of development trips per hour during the critical AM peak period.
- As mentioned before, there is also the additional concern that the NTS data are national averages, not local. While this could of course mean that this data source is *over-estimating* impact, it may also be under-estimating the impact and we need to consider the potential worst-case scenario. While we need to be reasonable, it must also be considered that there is existing congestion at various M2 junctions and the proposal is not in the Local Plan; therefore, we need to be particularly careful to assess the impact more thoroughly.

- **Regarding both points related to the NTS data, sensitivity testing would be appropriate in this instance, or the use of a different data source as we suggested in our previous response.**
- **We also previously requested the Census 2011 Journey to Work Statistics for Middle Super Output Area Medway 018, which was used in the TA to determine mode share for each journey purpose separately. Appendix B does not include this; it only includes the directional data for the traffic distribution assessment. This request is still outstanding.**
- **The geographical extent of the Middle Super Output Area Medway 018 includes streets served by several bus services. Many homes in this area would have a bus stop within a very short distance, served by several bus routes, whereas residents of the proposed site would have to walk much further. This could make a real difference to mode shares and therefore, as commented previously, this methodology could be under-estimating the probable car mode share of the proposal. ***In order to verify the use of this data source for mode share, we would recommend that funding of a bus service within close proximity to most houses of the development (ideally 400 metres, in line with planning guidance) could be secured through a S106 Agreement, in the event that this development is approved in future.*****
- **Overall, we cannot yet agree to the stated trip generation of the TA.**

The March 2020 submission responds as follows:

- Table 4 of the submission summarises the revised AM peak development trips on the SRN.
- Reference is also made to the strategy for improving bus services to the site in section 4.5 of the TA.

Our updated response is as follows:

- The strategy for improving bus services to the site, as in section 4.5 of the TA, is welcomed and should be secured by the S106 Agreement if the proposals are consented. Highways England would like to be consulted on the planning of the strategy, if consent for the development were given. Refer to number 3
- As previously requested, we require the Census 2011 Journey to Work Statistics for Middle Super Output Area Medway 018; not just a table of results. We need a link to the dataset on the appropriate online source so that we can assess the source of the data and all assumptions/exclusions etc. Refer to number 1
- **Subject to the above and subject to our comments below under “Development trip distribution”, the revised AM peak development trips in Table 4 would appear broadly acceptable. However, we still do not agree with the assertion that these trips “cannot be considered material in the context of the operation of the strategic network”, for the reasons already given above in our updated response to “Base traffic volumes and growth”. Refer to numbers 2 and 10**

## Development trip distribution

We previously commented as follows:

Different methodologies are applied for different journey purposes. The majority of trips in the critical AM peak are for commuting, business, escorted education and

education.

Secondary education trips have been distributed according to the locations of nearby schools and assumed splits between them.

Primary school pupil and staff trips have been distributed according to 2011 Census journey to work data for the Middle Super Output Area (MSOA) of Medway 018.

The commuting and business vehicle trips have also been distributed based on the 2011 Census journey to work data for the Middle Super Output Area (MSOA) of Medway 018.

- We requested the Census 2011 Journey to Work Statistics, to verify the quoted percentages.
- We requested details of the geographical extent of the Middle Super Output Area Medway 018, as this could have quite varied distribution in reality.
- We said that, on receipt of the above information, we will review the distribution further. We will also check that the methodology does not double-count the reduction in trips due to internalisation (as noted under “Development trip generation” above).

The August 2019 submission responded as follows:

- Census 2011 Journey to Work Statistics are provided in Appendix B.
- The geographical extent of the Middle Super Output Area Medway 018 is shown in Image 1.
- The numbers of commuting and business trips are summarised in the August 2019 submission in the table under paragraph 4.2 (which is also Table 47 of the TA). These are determined from the data in Appendix B of the August 2019 submission.

In response, we commented as follows:

- We agree that the geographical extent of the Middle Super Output Area Medway 018 is acceptable for determination of trip distribution (although we have raised concerns above regarding its use for trip *generation*).
- ***We have the following queries regarding the distribution of commuting / business trips in the peak:***
  - ***While the use of Census 2011 Journey to Work directional percentages is reasonable, it is likely that traffic commuting to destinations to the west may use either Junction 2 or Junction 1; we will consider the potential worst case for each junction in our assessment of potential impacts.***
  - ***Regarding the internal Medway locations in Appendix B, we ask that the applicant's agent provide a map of these locations, so that we can assess the accuracy of this methodology.***
- Upon receipt of the above requested information, we will complete our review of the development trip distribution, based on this information.

The March 2020 submission responds as follows:

- The submission again asserts that “*it is unlikely that there will be an impact at*

*junction 2. In any event, if a proportion of journeys take this route this will only reduce the overall impact at other locations”.*

- Of the internal Medway locations from Appendix B of the previous August 2019 submission, the March 2020 submission shows the locations of three of them (out of a total of 38).

Our updated response is as follows:

- As we stated above, we cannot assume that there will be no impact at Junction 2. Refer to number 8 and 9
- We need to consider the potential worst case for *each* junction. They may use Junction 2 *or* they may use other junctions, so we cannot accept that an impact on Junction 2 is acceptable because it reduces the impacts on other junctions. Either situation may happen – we need to plan for each junction’s worst-case scenario. Refer to number 8 and 9
- Furthermore, some traffic may use Junction 2 and other junctions in the same trip. Refer to number 8 and 9
- We had requested a plan showing the locations of the 38 Medway internal locations listed in the methodology in Appendix B of the previous August 2019 submission; not just the three local ones. We need to assess the accuracy of this methodology for determining the distribution of commuting / business trips in the peak. Refer to number 7
- Upon receipt of the above requested information, we will complete our review of the development trip distribution, based on this information. Refer to number 8 and 9

## Modelling

We previously responded as follows:

- No modelling of the SRN has been undertaken; the TA states that this is not considered necessary because the *“the impact on any single link will be a maximum of 30 trips during the peak hour”*.
- Please refer back to our above comments on various aspects of the TA’s methodology. When these are addressed, we will be in a better position to understand whether or not SRN modelling may be required.
- We need to consider the cumulative impact with committed developments and/or background traffic growth too.
- There is existing congestion at various M2 junctions. Also, the proposal is not in the Local Plan and we therefore need to be particularly careful to assess the impact more thoroughly.
- It may be appropriate to consider this proposal within the Medway Local Plan Traffic Modelling. This is still under development, and Highways England are involved in this process.
- The number of additional trips at a junction is more important than the additional trips on a *link*, due to the interaction of links at a junction.

The August 2019 submission does not address this, and instead maintains that, based on the forecast additional traffic onto the M2, a detailed assessment of the SRN is not warranted.

**In response, re-iterate that we have outstanding concerns regarding the**

**methodology of the assessment; and therefore, our previous comments on modelling still apply.**

The March 2020 submission responds as follows:

- *“Based on the forecast traffic impact on the strategic road network, which is modest, it is not considered junction modelling is warranted.”*
- *“Medway have undertaken their own modelling on the surrounding network using their AIMSUN model which includes the strategic road network (Subnetwork 1). They have confirmed that only subnetworks 2, 3 and 7 experience any material change on flows and therefore the strategic road network is not affected.”*

Our updated response is as follows:

- For our reasons given elsewhere in this response, we do not have certainty that the impact on the strategic road network is modest; junction modelling is therefore warranted. Refer to numbers 9 and 10
- We need further detail on the Medway model, particularly in support of the statement that *“only subnetworks 2, 3 and 7 experience any material change on flows”*. In what growth and development scenarios, which time periods and years? And how is a “material change” defined in this instance? Refer to number 13
- Even if Medway’s modelling showed no material change in flows on the SRN, the addition of the development traffic on top could be a material impact, especially as the model shows that there is already a need for mitigation at all SRN junctions without this development. Refer to numbers 11 and 13
- ***All our previous comments on modelling still apply.***

## **Mitigation**

We previously commented as follows:

We will consider the need, if any, for mitigation measures when the above comments and queries have been addressed and we are in a position to understand fully the potential SRN impacts.

We may also comment on construction traffic impact, if appropriate, which could be addressed by a construction traffic management plan.

The March 2020 submission does not respond to this at all.

**Our response remains the same.**

## **Summary and Conclusions**

Overall, we remain of the view that the development has the potential to result in a significant amount of AM and PM peak hour trips, and there is not yet a definite indication of the impact upon the SRN. We therefore cannot determine if the proposal will materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/13, particularly paragraphs 9 & 10, and DCLG NPPF, particularly para 109).

Please note that this email does not constitute a formal recommendation from Highways England. We will provide a formal recommendation when we can be confident that the application is in its final form. In the meantime, we would ask that **the planning authority does not determine the application** (other than a refusal), ahead of us receiving and responding to the required/requested information. In the

event that the authority wishes to permit the application before this point, we would ask the authority to inform us so that we can provide substantive response based on the position at that known time.

You will note that I have also copied our response to the applicant's agents and transport advisors. If they or you have any queries, please contact us at [planningse@highwaysengland.co.uk](mailto:planningse@highwaysengland.co.uk).

Kind regards,

David

**David Bowie**

**Area 4 Spatial Planning Manager (Acting)**

**Tel:** +44 (0) 7900 056130

Highways England | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

Web: <http://www.highwaysengland.co.uk>

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|National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park,  
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**Juan Lopez**

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**Francis Taylor Building**

Inner Temple

London EC4Y 7BY

**DX:** 402 LDE **Tel:** 020 7353 8415 **Fax:** 020 7353 7622

[clerks@ftbchambers.co.uk](mailto:clerks@ftbchambers.co.uk)

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