

TRANSPORT AND WORKS ACT 1992
PROPOSED ROTHER VALLEY RAILWAY (BODIAM TO ROBERTSBRIDGE
JUNCTION) ORDER
Ref: APP/K3605/W/19/3235260

HIGHWAYS ENGLAND
PROOF OF EVIDENCE OF PAUL WILLIAM HARWOOD
BSc CEng MICE MCIHT

Date: 07 June 2021

IMPACT OF THE PROPOSED DEVELOPMENT ON THE A21 TRUNK ROAD
POLICY, LAND AND CONSENTING MATTERS

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**Evidence of Highways England Witness Paul William Harwood BSc
CEng MICE MCIHT**

Qualifications and Experience

1. I am a Chartered Engineer, a Member of the Institution of Civil Engineers and a Member of the Chartered Institution of Highways and Transportation. I hold a Bachelors' degree in Civil Engineering. I am currently the Regional Lead for Spatial Planning in the Guildford office of Highways England covering London and the South East.
2. I have been employed by Highways England and its predecessors for over forty years. For a large proportion of that time my duties have involved the interface between the trunk road network and the spatial planning system.
3. I have acted as an expert witness at a number of Planning Inquiries and Local Plan Examinations in Public, most notably the Planning Inquiries into the Blue Water Park Shopping Centre and the Kent International Gateway Rail-freight Interchange.
4. I am familiar with the site and its surroundings, the local and strategic road networks in the vicinity and insofar as they relate to highway matters.

Scope of Evidence

Highways England

5. Highways England is an arms-length, government-owned company wholly owned by the Secretary of State for Transport. It came into being on 1 April 2015. Highways England is the successor organization to the Highways Agency which was an Executive Agency of the Department of Transport.
6. Section 1(1) of the Infrastructure Act 2015 provides that the Secretary of State may appoint strategic highway companies and Section 6(1) that the Secretary of State may from time to time give a strategic highways company directions or guidance as to the manner in which it is to exercise its functions. Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Act and is the highway authority, traffic authority and street authority for the Strategic Road Network in England (“the SRN”). The directions and guidance to Highways England under Section 6(1) are in the form of a Licence (Appendix A). The Licence constitutes statutory guidance except where the word ‘must’ is used, in which case those passages constitute statutory directions (para 2.1 of the Licence). The A21 to the north and south of the point where the proposed development crosses that road forms part of the SRN.
7. Para 4.1 of the Licence sets out that the SRN is a critical national asset which Highways England is under statutory direction from the Secretary of State to operate and manage 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.
8. Highways England is therefore concerned with proposals that have the potential to impact safe and efficient operation of the A21.
9. Highways England’s assessment of The Rother Valley Railway (Bodiam to Robertsbridge Junction) Order (“the proposed Order”) is also guided by:

a) Department for Transport Circular 02/13 *The Strategic Road Network and the Delivery of Sustainable Development* (RVR/HE/07, RVR Core Documents Library).

b) Relevant other government policies but, in particular, the current National Planning Policy Framework (dated February 2019) (RVR/HE/06, RVR Core Documents Library) and within that paragraph 109 which states:

Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe and should be

taken as superseding paragraph 9 of Circular 02/13 where it states:

However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

10. Highways England's evidence will therefore focus on those aspects of the proposed railway relating to the A21 Trunk Road.

My evidence

11. My evidence addresses the following issues: policy, land, and consenting matters.

I will elaborate on the following points in more detail:

- a) Respective Responsibilities of the Office of Road and Rail and Highways England
- b) The Policy of the Secretary of State
- c) History of Involvement in The Project by Highways Agency/Highways England
- d) Matters We Understand to be Agreed with Rother Valley Railway (RVR)
- e) Matters Remaining Under Discussion with RVR
- f) Statement of Common Ground

12. My colleague Mr. David Bowie will provide evidence on technical matters. Mr.

Bowie will elaborate on the following points in more detail, within his proof (OBJ782/W2/1):

- a) Design Manual for Roads and Bridges
- b) Assumptions made in preparation of the DMRB

- c) Scope and Aspects Covered
- d) Application of the DMRB
- e) A21 Trunk Road: Robertsbridge Road By-pass
- f) Departure Submission
- g) Impacts of the Proposed Level Crossing
- h) Outline Design Drawings
- i) Impact to Highway Structures

13. Highways England reserves the right to update and expand its case in response to any further information submitted by the Rother Valley Railway ("RVR") as may be necessary.

Summary of Highways England's Position

14. Highways England's Statement of Case (OBJ/0782) was submitted to the Inquiry on 20 September 2018. In the intervening period there has been considerable discussion between Highways England and RVR. This has allowed a number of issues identified in Highways England's Statement of Case to be addressed. However, a number of matters remain to be agreed and Highways England's objection to the proposal remains.

15. Draft Statements of Common Ground have been exchanged between RVR and Highways England. The latest version at the time of writing (dated 31 May 2021) was prepared by Highways England and is in the Inquiry library under reference RVR/HE/03. We wish to enter into an agreed Statement of Common Ground with RVR. At the time of writing this appears some way off being concluded.

16. A number of matters remain subject to further discussion these are set out in the draft SoCG, but the list is not necessarily comprehensive. Of most significance is that the decision as to whether to agree a Departure from the Design Manual for Roads and Bridges (DMRB) is still under review within Highways England pending various clarifications and additional information requested from RVR. These are set out in document (RVR/HE/02) within the Inquiry library. Mr. Bowie's evidence will deal with this in detail.

a) Highways England continues to object to the proposed Order for the following reasons:

- a) Highways England considers that the installation of a level crossing on the A21 will be detrimental to safety on the A21;
- b) The design of the proposed railway where it crosses the A21 Trunk Road does not conform to the Design Manual for Roads and Bridges

17. While the above issues may be capable of being overcome, at present Highways England maintains a clear objection to the appeal proposal.

Points of Detail

Respective Responsibilities of the Office of Road and Rail and Highways England

18. ORR has a general duty to do such things and make such arrangements as it considers appropriate for the purposes of railway safety, and to assist and encourage persons concerned with matters relevant to those purposes to further those purposes. ORR also has specific duties in respect of the approval of level crossings.

19. As set out in para 7 above Highways England is under statutory direction to manage the SRN in the public interest.

20. It is inappropriate for Highways England to comment on whether the proposed level crossing conforms with ORR's policies.

21. Prior to the submission of the Office of Road and Rail (ORR)'s Statement of Case, Ian Raxton of the ORR wrote, on 23 January 2020, to Mike Hart of Rother Valley Railway prefacing ORR's decision on the acceptability of the level crossings proposed by RVR (Appendix C). A number of points in the letter, quoted below, remain relevant to Highways England's case:

- a) ORR have not made any cross check of the construction costs that RVR*

provided or attempted to validate the potential costs related to whether external contractors or Rother Valley resource is used to construct the works.

- b) The situation at the A21 appears more complex than the other roads, with higher traffic speeds and the additional potential complication of the signaller mixing direct observation of the crossing with CCTV and information from obstacle detection. While there are limited physical restrictions that would prevent a grade separated crossing we acknowledge that the flooding risk and AONB may restrict their use; these are matters for the Inquiry though and ORR does not have the competence to consider their effects.*
- c) We have taken the lowest cost of the various grade separation options and concluded that there will be a degree of gross disproportion in costs between that and a level crossing. The degree of disproportion falls within the HSE suggested range for such factors, where it then becomes more important to consider other non-monetary factors that affect the crossing safety. We note the relatively low train speed, the frequency of operations, the proposals to extend the 40mph road speed zone, the potential to have good sightlines, the proximity of the signaller to the crossing, and issues such as the potential consequences of a collision between a road vehicle and a train. The lack of any information from Highways England on the safety performance of the A21 at this location has to be flagged as a factor we have not been able to account for, though we note public data that indicates that the A21 overall has a poor safety record amongst trunk roads.*
- d) Our consideration is that there is a degree of gross disproportion in costs at this location and that it is then the other factors beyond cost that guide whether the exception circumstances test is met. If the most reasonably practicable crossing solution that delivers the best safety performance is provided and this includes appropriate safety measures on the highway approaches, then on balance we consider that the exceptional circumstances test would be met. We will highlight to the Inquiry that ORR's view is limited to railway safety issues and that aspects such as wider highway safety and*

congestion impacts and environmental issues are outside our competence and are for them to consider.

- e) Whilst we can envisage that a form of tolerably safe crossing could be constructed at this location we remain to be convinced that the specific arrangement currently described achieves that and would want to further discuss the detail of a crossing if the principle of having one at the A21 is authorised in a TWA Order, with final arrangements being set out in a Level Crossing Order in the normal fashion.*
- f) ORR considers that the type of road crossing that you are proposing with a combination of staff control, CCTV monitoring and obstacle detection is not directly comparable to the 'MCB-OD' crossing types used on the mainline railway. The MC-OD used on the mainline railway is an automatic crossing type with no role for staff intervention in the sequence activation, and hence gives reduced scope for human error, and includes both LIDAR and RADAR obstacle detection methods.*
- g) We remain concerned about the implications of SPADs at the road crossing locations and would want to discuss this further should the TWA be granted authorising crossings.*
- h) We will recommend that the inquiry leaves open the issue of what each crossing is in detail. For the road crossings this further step can be resolved in due course through the issue of Orders under the Level Crossings Act 1983.*

22. With respect to (b) and (f) Highways England has been in discussion with both ORR and RVR. RVR have revised their proposals so that the type of level crossing now proposed by RVR will be a Full Barrier Automatic Level Crossing, Locally Monitored (AFBCL) (Para 1 of New Build Level Crossing Narrative Risk Analysis appended to ORR's Addendum Statement of Case of 21 May 2021). The 'diagram of the proposed railway alignment' at Page 5 of the same document continues to show a '8m x 3m LC monitor building'. RVR should confirm that this building is no longer required, alternatively we will wish to

discuss with RVR whether and how access to the building can be achieved without detriment to the safety and operation of the A21.

23. With respect to (g) paragraph 1 of the New Build Level Crossing Narrative Risk Analysis appended to ORR's Addendum Statement of Case of 21 May 2021 (REP/017-1) also contains, at the bottom of page 2, an undertaking to provide Red-light safety equipment (RLSE) on the A21 to deter drivers of road vehicles from 'running' the crossing signals. Highways England supports this in principle but it has not been incorporated into the preliminary design of the A21 and we have no evidence from RVR as to how it will be operated and maintained and who will undertake any prosecutions that arise.
24. With respect to (c) RVR has undertaken a detailed analysis of the safety record of the A21 and Highways England is satisfied that there is a good safety record on this local section of the A21.
25. With respect to (h) the draft protective provisions provide for Highways England to input into the detailed design of the crossing. Therefore, we agree that the inquiry should leave open the issue of what the A21 crossing is in detail.

The Policy of the Secretary of State

26. The National Planning Policy Framework (NPPF) was first published in 2012 (Appendix B, OBJ782/W1/2) and paragraph 33 includes "improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."
27. Department for Transport Circular 02/13 "*The Strategic Road Network and the Delivery of Sustainable Development*" (the Circular) (Core Document Ref RVR/HE/07) was published in 2013 and deals specifically with the Strategic Road Network in the planning context. Paragraph 9 includes "However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."

28. It can be seen that the wording in the Circular mirrors that in the 2012 version of NPPF. However, the corresponding wording in paragraph 109 of the current 2019 version of NPPF (Core Document Ref RVR/HE/06) is “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

29. Highways England’s understanding of the current policy of the Secretary of State is that NPPF 2019 prevails over the Circular in this respect. In respect of the SRN development should only be prevented or refused on highways grounds if the impact on highway safety would be unacceptable rather than severe.

30. Paragraph 9 of the Circular states:

“Local authorities and developers will be required to ensure that their proposals comply in all respects with design standards. Where there would be physical changes to the network, schemes must be submitted to road safety, environmental, and non-motorised user audit procedures, as well as any other assessment appropriate to the proposed development. The Design Manual for Roads and Bridges sets out details of the Secretary of State’s requirements for access, design, and audit, with which proposals must conform.”

In the intervening period since the Circular was published non-motorised user audits have been replaced within DMRB by Walking, Cycling and Horse- Riding Assessment and Review. (DMRB GG142) (Appendix F).

31. DMRB’s expectations in respect of the progress of design of a development project are set out in DMRB GG119 Road Safety Audit Rev 2 (Appendix G). Par 5.17, 5.17.1, 5.46 and 5.46.1 of which state:

“Stage 1 road safety audit - Completion of preliminary design

5.17 Stage 1 RSA shall be undertaken at the completion of preliminary design, (for example at the order publication report stage) before publication of draft orders.

NOTE The end of the preliminary design stage is often the last occasion at which land requirements can have the potential to be changed.

5.17.1 Stage 1 RSA should include road safety matters which have a bearing upon land take, license or easement before the draft orders are published or planning consent is applied for.....

5.46 Where third party organisation-led schemes have the potential to result in highway schemes on the trunk road and motorway network, the process set out in this document shall be followed for all stages of RSA including appointment and approval of the RSA team

5.46.1 A stage 1 RSA report should be undertaken before planning consent is applied for as this demonstrates that the potential for road user safety issues has been addressed.”

32. It should be noted that a Road Safety Audit is not a freestanding element of design but rather the culmination of the preliminary design stage. It should also be noted that there is no requirement to carry out a detailed design prior to order publication or submission of a planning consent. Contrary to assertions made by RVR we have never asked RVR for a detailed design at this stage of the project. The reference to a Stage 1/2 Road Safety Audit on para 34 of our statement of case follows from the request for approval of an Audit Team for a Stage 2 Road Safety Audit which we received on 30 May 2017 and is referred to at para 8 of the statement of case (OBJ/0782). If RVR had indeed completed a detailed design then the Road Safety Audit should have been Stage 1/2 rather than Stage 2, because no DMRB compliant Road Safety Audit has been completed for the project.

33. In the event the designs currently available from RVR fall short of a completed preliminary design. To some extent this is because the DMRB Departures process is not yet complete. Nevertheless, it is disappointing that RVR have not yet produced a consolidated, complete and up to date general arrangement drawing, with corresponding sections, showing where the A21 and the proposed railway cross and combining the proposed railway earthworks and retaining structures alongside the level crossing and the changes to the A21 currently proposed by RVR.

34. It will be noted that our predecessor organization the Highway Agency should have required this level of design at the Town and Country Planning Act stage and before planning permission was granted. Their failure to do so was by way of trying to assist RVR taking into account that, unusually, a further permission by way of a Transport and Works Act application would be needed for the proposed development to proceed. However now that we are at this further stage there is no scope for further flexibility.

History of Involvement in The Project by Highways Agency/Highways England

35. Paragraphs 5 to 8 of our Statement of Case (OBJ/0782) outline the historic involvement of Highways England.

36. To this should be added the Town and Country Planning Act application made to Rother District Council in 2014 under reference RR/2014/1608/P for the “Reinstatement of the Rother Valley Railway from Northbridge Street, Robertsbridge to Junction Road, Bodiam.”

37. On 26 March 2015 the Highways Agency by authority of the Secretary of State for Transport directed the Council by way of form TR110 to attach a number of planning conditions to any planning permission granted. (Appendix F, OBJ782/W1/2). These conditions were incorporated into the planning permission granted by Rother District on 22 March 2017.

38. Following the submission of our Statement of Case (OBJ/0782) RVR provided some of the further information requested in it in October 2018. Following this there was no substantive discussion on technical matters until March 2019 when we sent an example of a DMRB Departure submission to RVR’s consultants iTransport.

39. In March 2019 we supported a request from RVR for the Local Inquiry to be delayed allowing further discussions with ORR and ourselves. After March 2019 there was no substantive contact between RVR and ourselves until December 2019 when RVR’s solicitors wrote to us advising that RVR had made a submission

to ORR for ORR's approval for the proposed level crossing.

40. In February 2020 ORR approved the level crossing in principle whilst caveating that it was for HE to comment on the road safety aspects. The same month we met with RVR and their consultants i-Transport and set out once again our requirements for a preliminary design including a GG104 risk assessment, approval in principle for DMRB Departures and a Stage 1 RSA.

41. Following this RVR engaged with us on a more purposeful basis in respect of both legal and technical matters.

Matters We Understand to be Agreed with RVR

42. Matters we understand to be agreed with RVR are set out in the unagreed draft Statement of Common Ground sent to the Programme Officer on 31 May 2021 Inquiry reference RVR/HE/03 Response to Initial RVR SoCG. If it transpires that any of these matters are not agreed I will update and expand my evidence accordingly.

Matters Remaining Under Discussion with RVR

43. Matters remaining under discussion are also set out in RVR/HE/03 Response to Initial RVR SoCG. These matters are addressed in my and Mr. Bowie's evidence as follows:

Ref	Description of Matter	Details of Discussion	HE Statement of Case Reference	Proofs of Evidence
5.1 Policy and Legal Compliance				
5.1.1	National Planning Policy Framework (February 2019)	Whether paragraph 109 of National Planning Policy Framework (February 2019) supersedes paragraph 9 of DfT Circular 02/13.	Paragraph 2	Paul Harwood para 26-29

Ref	Description of Matter	Details of Discussion	HE Statement of Case Reference	Proofs of Evidence
5.1.2	DfT Circular 02/13	Whether the information submitted in respect of the A21 level crossing satisfies the requirements set out at Paragraph 11 of the Circular.	Paragraph 1,11, 4(d), 23	David Bowie, para 78 to 87
5.1.3	ORR: Level Crossings: A guide for managers, designers, and operators (2011)	That use of guidance in design of A21 level crossing is appropriate. Linked to Departure approval.	4(d)	David Bowie, para 54-73
5.1.4	Equality Impact Screening and Assessment	EqIA screening to be provided by RVR		Paul Harwood, para 40
5.2 Road Safety				
5.2.1	Effect on Road Safety of A21	Whether there would be an unacceptable impact on highway safety. This was assessed as part of Departure submission and is under review by HE.	4(a), 12	David Bowie, para 56 & 57, 62 to 67, 70 to 75
5.2.2	Safety Risk Assessment (SRA)	Whether the SRA demonstrates the risk to road user/workers is following mitigation as low as reasonably practicable and tolerable.	4(a), 12,	David Bowie, para 59 – 68,
5.2.3	Queuing vehicles	Whether the maximum queues arising from the level crossing operation can be accommodated safely on the A21.	4(a), 12	David Bowie, para 70 to 74

Ref	Description of Matter	Details of Discussion	HE Statement of Case Reference	Proofs of Evidence
5.2.4	Impact arising from A21 level crossing	Whether the queues arising from the level crossing would adversely impact upon the operation of the Robertsbridge roundabout Whether the queues arising from the level crossing would adversely interact with the existing A21 pedestrian crossing (north of Robertsbridge roundabout).	4(a), 12, 13	David Bowie, para 70 to 72
5.3 A21 Traffic Flow				
5.3.1	Impact arising from A21 level crossing	Whether the proposed level crossing would materially delay traffic on the A21.		David Bowie, para 87 to 89
5.4 Highway Design & Departure				
5.4.1	Preliminary Design	Whether RVR's current preliminary design provides an acceptably safe level crossing of the railway and the A21 Trunk Road	4(d), 23, 29, 30	David Bowie, para 77 to 86
5.4.2	Culvert AIP	Whether the existing culvert would be adversely affected by the level crossing	23, 33	David Bowie, para 90 to 95
5.4.3	Geotechnical Advisor	Discussions between HE and RVR advisors ongoing to confirm requirements at this stage.		David Bowie, para 90 to 95
5.4.4	Safety Risk Assessment	That the risk to all populations following mitigation is as low as reasonably practicable and tolerable	4(d)	David Bowie, para 59 to 68

Ref	Description of Matter	Details of Discussion	HE Statement of Case Reference	Proofs of Evidence
5.4.6	Design Drawings	<ul style="list-style-type: none"> – Whether the following preliminary highway design drawings of modifications to the A21 are compliant with DMRB insofar as it covers the requirements of the design: – Robertsbridge Bypass General Arrangement 23905-ARP-XX-XX-DR-CH-0001; – Robertsbridge Bypass Road Markings 23905-ARP-XX-XX-DR-CH-0002; – Robertsbridge Bypass Traffic Signs 23905-ARP-XX-XX-DR-CH-0003; – Robertsbridge Bypass Construction Details 23905-ARP-XX-XX-DR-CH-0004. 	4(d), 29, 30, 31	David Bowie, para 77 to 86.

44. DMRB GG 101 (Appendix G) and GG104 (Appendix H) paras 1.6 to 1.8.1 require an equality impact screening and where indicated a full Equality Impact Assessment to be carried out. We understand that RVR are currently carrying out an equality impact screening and await the outcome.

45. In the draft Statement of the Common Ground (RVR/HE/03) there are also comments in respect of paragraph 10 of the Statement of Case that require comment. We understand that RVR do not accept that the level crossing is an 'access'. Highways England considered that the level crossing might be regarded as an access. This originates from the ORR document ORR RSD Internal Guidance RIG-2014-06 (Appendix I, OBJ782/W1/2) which states at para 8

“8. Network Rail also has a general “no new crossings” policy. The heritage sector is encouraged to publish details of crossings on its network and any planned closures. The Highways Agency has a policy of no new accesses on the strategic road network other than in exceptional circumstances where it can be sufficiently

demonstrated that there is a net benefit to the network.”

46. RIG-2014-06 having drawn a connection between a level crossing and an access, Highways England then needed to consider current policy towards access to the SRN. This has moved on from what is quoted in RIG-2014-06 and is contained in paragraph 37-44 of the Circular and paragraph 5.36 of Highways England’s Licence (Appendix A, OBJ782/W1/2).

47. Paragraph 43 of the Circular (RVR/HE/07) describes how the Highways Agency will adopt a graduated and less restrictive approach to the formation or intensification of use of access to the remainder of the strategic road network. The remainder of the strategic road network is those parts that are not motorways and routes of near motorway standard.

48. Subsequently Highways England’s Licence as a statutory direction from the Secretary of State modified the policy in the Circular 02/13. Paragraph 5.36 states:

“5.36 The Licence holder must, in making decisions under section 175B of the Highways Act about permission for any new connections to its network:

a. Unless otherwise directed by the Secretary of State, consider granting permission in light of the nature of the road in question and the consequences of the new connection, having particular regard to:

i. In the case of sections of the network designed for high- speed traffic, with partially or comprehensively limited access, there should be a presumption against connection, except where it can be provided safely and where there is a demonstrable benefit to the economy;

ii. On all other sections of the network there should be a presumption in favour of connection, except where a clear case can be made to prohibit connection on the basis of safety or economic impacts.”

49. Noting that terminology has changed so that an ‘access’ has now become a ‘connection’, the A21 at the point where the level crossing is proposed falls within

paragraph 5.36(a)(ii) so that there would be a presumption in favour of connection except where a clear case can be made to prohibit connection on the basis of safety or economic impacts.

50. Highways England accepts there is uncertainty as to whether the level crossing is a connection. However, if it is not, then RVR cannot benefit from the presumption in favour of connection within Highways England's Licence.

51. If the level crossing were considered to be a connection, it should be noted that the presumption is subject to the exception where a clear case can be made to prohibit connection on the basis of safety or economic impacts. Highways England's current position is that such a case cannot be ruled out. This can only be established when the Departure and, if appropriate, Road Safety Audit processes have run their courses.

Statement of Common Ground

52. Highways England will continue to engage with RVR and seek to finalise an agreed Statement of Common Ground as soon as may be possible.

Conclusion

53. Highways England submitted its statement of case on 20 September 2018 (OBJ/0782). In the intervening period RVR have produced significant amounts of the material missing from the original Transport and Works Act Order that was required to establish the impact of the proposal on the A21 Trunk Road.

54. Highways England understands that a number of matters set out in the statement of case are now agreed with RVR. Highways England is engaged with RVR with a view to agreeing a Statement of Common Ground (RVR/HE/03).

55. Nevertheless major points are not yet agreed, particularly in respect of whether the risks of the proposed level crossing of the A21 are tolerable and, that being the case, as low as reasonably practical. RVR have not yet completed the Departures and

Road Safety Audit processes within the DMRB.

56. Highways England's objection to the proposed development is maintained until such time as we can be satisfied that all the points in our Statement of Case have been satisfactorily addressed by RVR.

57. Highways England will seek to work with RVR with a target to resolve all matters between us before the end of the Inquiry

A handwritten signature in black ink that reads "Paul Harwood". The signature is written in a cursive, slightly slanted style.

Paul William Harwood, BSc CEng MICE MCIHT

Regional Lead for Spatial Planning

7th June 2021

List of Appendices (Please see Document OBJ782/W1/2 - Appendices)

Appendix A	Highways England Licence
Appendix B	National Planning Policy (March 2012)
Appendix C	Letter dated 23 January 2020 from Ian Raxton to Mike Hart
Appendix D	DMRB GG142 Walking, Cycling and Horse-Riding Assessment
Appendix E	DMRB GG119 Road Safety Audit
Appendix F	TR110 Dated 26 March 2015
Appendix G	DMRB GG101: Introduction to the Design Manual Roads and Bridges
Appendix H	DMRB GG104 – Requirements for Safety Risk Assessment
Appendix I	ORR RSD Internal Guidance RIG-2014-06