

## Issue Specific Hearing 4 (ISH 4) Traffic and Transportation

### Action Point 4

**Request for Additional Sensitivity Testing: Please provide further details as to why additional sensitivity testing is required.**

#### **Gravesham Response:**

Gravesham refers the ExA initially to its response to Q4.1.14, which outlines this authority's concerns regarding transport modelling and whether the WebTAG based approach taken to date fully captures likely levels of growth that may occur in this area, because of Government planning policy and the use of the Standard Method to determine local housing need.

Demand arising from residential development within the current transport modelling appears to be constrained to National Trip End Model (NTEM) forecasts of growth, which may underrepresent the scale of housing growth that local planning authorities are (as a minimum) required to seek to achieve under Paragraph 11 of the National Planning Policy Framework (NPPF, 2023).

This may have implications not only for the ability of the proposal to accommodate such levels of development and the performance of key links and junctions (such as the A229 Bluebell Hill) but also whether the ES provides an adequate representation of significant adverse environmental impacts under a realistic worst-case scenario.

On this, GBC notes that the EIA Scoping Opinion<sup>1</sup> issued in 2017 drew the applicant's attention to comments made by Medway Council and Essex County Council in respect of planned levels of growth and required at 13.8.16 that the ES should take this information and any other relevant information of this sort into account.

The applicant's response to this is contained in APP-340 under ID7 People and Communities Operational effects at page 54. The applicant explains the process that was gone through, including how details of developments provided by the Local Planning Authorities were included in the Uncertainty Log.

This then informed the transport modelling of the Core Scenario based on those developments that the applicant considered to be Near Certain or More than Likely. No Alternative Scenario (allowed for under WebTAG Unit M4: Forecasting and Uncertainty) appears to have been run, to include developments that were (for example) Reasonably Foreseeable and might directly impact on the project due to proximity.

This raises two specific issues whereby GBC suggests that sensitivity testing is required:

1. As noted above, if the WebTAG approach adopted by the applicant has constrained modelled trips to NTEM derived levels, then the full impact of planned levels of growth may not have been accounted for in the modelling. A comparison of transport impacts as currently assessed with an Alternative Scenario (not constrained to NTEM outputs) based on housing growth levels reflecting the application of the Standard Method, would be helpful therefore in understanding potential realistic

---

<sup>1</sup> See <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-000033-LTC%20-%20Scoping%20Opinion.pdf>

worst case environmental impacts more fully and how the project would perform under such conditions.

Gravesham acknowledges that WebTAG Unit M4 advises that growth in a transport model should be controlled to TEMPRO growth forecasts for the core scenario and the Common Analytical Scenarios) when preparing a business case (para 7.1.7 and para 7.3.5). However, WebTAG does not advise that other assumptions cannot be used when undertaking sensitivity tests to assess the robustness of the traffic and transport modelling.

The concern that GBC has is that there is a mismatch between the guidance formulated by the DfT in WebTAG and the guidance issued by DLUHC to local planning authorities when considering the future patterns of housing growth. The starkness of the divergence between a TEMPRO controlled forecast and the growth levels that LPAs are expected by DLUHC to accommodate is presented in Figure 3.4 of the LIR [REP1-228].

A key reason for the divergence would appear to be the selection of input data for the respective housing figures.

TEMPRO uses two principal sources: adopted local plans/LPA authority monitoring reports (in NTEM 7.2) and local plans and the 2018 household projections (in NTEM 8.0).

In GBC's case, its adopted local plan was adopted in 2014 and only projects growth to 2028. Its housing provision is therefore materially out of date. GBC's authority monitoring report (as used in Annex F of NTEM 7.2) dates from 2015 and is also out of date.

The Standard Method that LPAs are required to use when producing local plans at the present time (unless they can demonstrate exceptional circumstances) uses 2014 household projections. This is a deliberate policy choice by DLUHC in order to bring about a significant uplift in housing delivery and address affordability issues. In the Planning Practice Guidance issued by DLUHC (<https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>) it is stated very clearly at para ID2a-005-20190220 that:

*"The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes."*

The PPG also advises that later household projections are not compatible with the Standard Method, stating at para ID2a-015-2019220:

*"Any method which relies on using household projections more recently published than the 2014-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method."*

The consequence of this divergence in the input data is that the use of the TEMPRO controlled growth forecasts will suppress traffic growth associated with new housing development to levels that are below the level of growth that LPAs must plan to provide in their local plans (and when making decisions on individual planning applications).

In Gravesham's case it is the difference between housing provision at the rate of 363 net additional dwellings per year (as set out in the adopted local plan) and housing provision at the rate of 701 net additional dwellings per year (as derived from applying the Standard Method). In other words, DLUHC expects GBC to provide almost twice as much housing moving forwards as is required by the adopted local plan.

As Figure 3.4 of the LIR shows, there are similar large-scale discrepancies for adjacent districts, partly because they also have dated local plans and partly because of the differences between the 2014 and the 2018 household projections.

In these circumstances, Gravesham sees it as necessary for the Applicant to carry out a sensitivity test, using the growth forecasts for housing derived from the Standard Method and not by constraining growth to the TEMPRO control for at least the districts in Kent and Essex and the London Boroughs, in order to show that the LTC is able to accommodate that scale of growth.

2. Irrespective of the above, GBC notes that the Medway Council Local Impact Report (REP1-258) refers to several large commercial developments on Hoo Peninsula at Grain and Kingsnorth (606,653 sqm B2/B8/Sui Generis etc) which are not included in the transport modelling. The applicant has responded (REP2-061) that these were not included because the necessary highway interventions required to support them 'up-stream' of Lower Thames Crossing had not been agreed and that without this it was not possible to model impacts. Because of this, an interim position has been agreed with Medway Council that would allow some development to come forward, subject to capacity constraints at M2 junction 1, with work being progressed separately on possible improvements to the existing junction to accommodate development if necessary. However, this is unsatisfactory because it could result in a situation whereby 'upstream' improvements on the A289 etc. are agreed, only to find that there is a constraint at the newly built Lower Thames Crossing junction that cannot be addressed or reduces headroom to accommodate emerging local plan developments. Sensitivity testing would therefore be prudent to ensure that traffic arising from the permitted developments at Kingsnorth and Grain can be accommodated on a 'worst case' basis should the 'upstream' constraints be addressed. GBC notes that there is still disagreement between Medway Council and the applicant on this point and that the former still argues that the developments should have been included in the modelling (REP3-188). GBC agrees with Medway on this. In terms of the National Grid development at Grain (MC/09/1628) there does not appear to be any Grampian style condition or 'monitor or manage' arrangement that would constrain delivery. In the case of Medway One (Kingsnorth), whilst there is an initial vehicle cap of 60 vehicle movements and a requirement under conditions that the developer demonstrate sufficient capacity at M2 junction 1, construction of Lower Thames Crossing would presumably release sufficient capacity on year of opening to lift this.

In addition to the above, Gravesham notes that the examination has yet to address the issue raised by several parties in relation to network resilience should incidents occur on the Strategic Road Network (SRN), particularly at either crossing.

Whilst the applicant contends that resilience would improve simply because Lower Thames Crossing would provide an alternative to Dartford, they accept that this would not result in

free-flowing conditions given capacity constraints on the intervening links and junctions. This is a particular concern that has been raised by DP World London Gateway (REP1-333) in respect of the A13 and Orsett Cock junction.

In the absence of evidence provided by the applicant on the impact of incidents (not just at Dartford) on the SRN and local road network, Gravesham is unable at this stage to comment on whether further sensitivity testing would be required in this area.

Neither can Gravesham comment on the environmental impacts of the proposal when incidents occur, as no evidence has been provided. This is clearly not a satisfactory situation given one of the scheme objectives is to improve resilience for cross-river journeys and incidents resulting in traffic being re-assigned are clearly anticipated.