

## Gravesham Borough Council

### Issue Specific Hearing 4 (6 September 2023) – (ISH4) on Traffic & Transportation

Examining Authority's Agenda Item / Question	Gravesham Borough Council's Response	References
<b>1. Welcome, introductions, arrangements for the hearing</b>		
<b>2. Purpose of the Issue Specific Hearing</b>		
<b>3. Traffic Modelling</b>		
<p><b>The ExA will ask questions of the Applicant and local highways authorities relating to the Applicant's approach to modelling uncertainties, junction modelling submitted at Deadline 1, outstanding requests for information, age and coverage of the LTAM data; and future growth scenarios that modelling and the scheme design should provide for.</b></p>	<p>Gravesham approach is as for any planning application – look at the evidence the applicant has supplied and get is assessed by the Highway Authority and then take their views with all the other factors into account in making a judgement on the application and any conditions/s.106 that are need to deliver necessary items to make the application acceptable.</p> <p><b>GBC ask:</b> Basic request from GBC point of view is for sensitivity test with Local Plan levels of growth (from standard method) not controlled to TEMPRO.</p> <p>GBC 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</p>	

	<p>advise that other assumptions cannot be used when undertaking sensitivity tests to assess the robustness of the traffic and transport modelling.</p> <p>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].</p> <p>A key reason for the divergence would appear to be the selection of input data for the respective housing figures.</p> <p>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).</p> <p>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.</p>	
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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 GBC’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, GBC 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.	
<b>a) Traffic Modelling</b>		
<b>i. Explanation and discussion of the Applicant's and DPLGW's transport work submitted at Deadline 1 [REP1-187 &amp; REP1-333] followed by a discussion about the potential impacts on Orsett Cock and Manorway junctions in light of the traffic reports and the Applicant's Response (see – Annex A Comments on WRs Appendix E – Ports [REP2-050]).</b>	Gravesham would not expect to comment on the detail of Orsett Cock and Manorway junctions being matters for Thurrock and the ports. However, if there are major concerns over the work that NH has done there is a logic in saying that if north of the river there are issues, there will be consequential impacts on network performance south of the river.	
<b>ii. Applicant to explain its approach to modelling uncertainties and whether any additional work is necessary in light of the recent publication of the "TAG Unit M4 - Forecasting and Uncertainty"</b>	See above for GBC position	
<b>4. Wider Network Impacts Management and Monitoring</b>		
<b>The ExA will ask questions of the Applicant relating to the Wider Network Impacts Management and Monitoring Plan (WNIMMP), in particular the desirability of the project to</b>	In line with the Gravesham approach, it follows that if the project causes an impact on a junction or road link it should mitigate for it. The first step in the process is to monitor what is going on both on the strategic and local networks (e.g. junctions along the A2). It	

<p><b>mitigate unacceptable impacts on the surrounding road network.</b></p>	<p>is appreciated due to multiple influences it may not be easy to sort out what is causing what, but the monitoring information will help in that process.</p>	
<p><b>a) Applicant's Approach to Mitigation</b></p>		
<p><b>i. NPSNN policy position in terms of wider mitigation of highway impacts</b></p>	<p>Clear position – if there are impacts on the local highway network attributable to LTC then as with any developer a mitigation package must be developed, monitored and implemented as necessary. GBC disagrees with the Applicant that NNNPS places no obligation on the Applicant to address congestion impacts on the wider network that are caused by or exacerbated by the LTC. GBC considers that there is no ‘in principle’ position in the advice in NNNPS to exempt the Applicant from addressing congestion impacts, and that a case-specific judgment is required for affected locations to determine whether mitigation (or the extent of mitigation) would be proportionate and reasonable. GBC has a further issue as to whether the scheme constrains the scale of growth that is planned for in the emerging Local Plan. This issue is related to GBC’s concerns about the Applicant’s transport modelling and the use of TEMPRO as a cap on growth, without the provision of any sensitivity test to show that the network would have the capacity to cope with the planned growth that is required as a result of the DLUHC use of the Standard Method in housing growth projections. GBC notes that the release of economic growth is an objective of the LTC and that objective is</p>	

		prejudiced or compromised if the effect of the LTC is to preclude local growth from coming forward because of the LTC's impacts on the local highway network and its refusal to mitigate or contribute to resolving those impacts.	
ii.	<b>Applicant will be asked to justify the approach in the WNIMMP specifically around the issue of mitigation</b>		
iii.	<b>Precedents for and against the Applicant's approach.</b>		
iv.	<b>The effect of the LTC scheme routes between the M20 and M2 motorways, in particular the A229 Bluebell Hill.</b>	<p>GBC view is that this should be an integral part of the scheme – but in any case, if Blue Bell Hill does not 'work' pushes traffic onto A228 and A227. (<del>NB Blue Bell as a bell that is blue not Bluebells!</del>). As local residents can testify, there are queues at peak times on the off slips which frequently back up into the M2. It is therefore failing now – and by definition not able to take significant additional traffic which is the basis that the LTC rests upon.</p> <p>Without prejudice to GBC's in principle view above, it has drafted a Grampian style requirement for consideration and which is contained in the GBC list of proposed amendments accompanying the written submissions on ISH7.</p>	
v.	<b>The Silvertown Tunnel Approach. Whether there is an alternative approach to wider impacts mitigation,</b>	Silvertown approach is an excellent example of the sort of approach needed. Havering has done work on this and GBC supports their representations and the related	

<p><b>for example, the approach taken in the made Silvertown Tunnel DCO?</b></p>	<p>representations made by KCC and by Thurrock Council.</p>	
<p><b>5. Construction Traffic Management</b></p>		
<p><b>The ExA will ask questions of the Applicant relating to the Outline Traffic Management Plan for Construction (OTMPfC) to include construction traffic route, governance structure and concerns regarding specific construction routes identified in the OTMPfC.</b></p>	<p>With all these bodies there an issue over how they are constituted, what their powers are and what happens if there a significant disagreements between parties. There will be disruption inevitably and the aim should be to minimise as far as possible impacts on local residents and businesses.</p>	
<p><b>a) Construction Traffic Management</b></p>		
<p><b>i. Adverse impacts arising from specific construction routes and/or road closures.</b></p>	<p>A2 works and Brewers Road closure for 19 months. GBC has made separate comments on the OTMPfC [REP3-121].</p>	
<p><b>ii. Applicant asked to set out how the Traffic Management Plan would work in practice.</b></p>		
<p><b>iii. Mitigation, monitoring and compensation during construction phase</b></p>	<p>Same principle applies. Impact on business – including Cascades Leisure Centre, SWCP etc. Impact derives from what drivers think the position is, even if in fact that is not the case</p>	
<p><b>6. Next Steps</b></p>		
<p><b>7. Closing</b></p>		