

Kind regards

Simon Tucker
David Tucker Associates
Transport Planning Consultants

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From: [neave_robert](#)
To: [Simon Tucker](#)
Cc: [Peter Hawke](#)
Subject: Land At Pump Farm
Date: 06 November 2020 16:23:54
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

Good Afternoon Simon,

Following your latest email, I will be sending a number of emails with attachments (due to size).

Please see the following responses below regarding your queries ,

DTA comment

“From initial review I am concerned to see from the Select Link Analysis files that the traffic flows to and from the proposed development do not accord with the access strategy we have submitted to you and that further, the overall traffic generated by the site in those files is significantly different from that presented in Table 7 of the Sweco Report. Although we do not as a matter of record agree the trip rates Sweco have adopted (as set out in Table 7) it is clearly essential that the modelling properly reflects the scheme and at present that is not the case. I attach a table which compares the Sweco adopted trip rates from Table 7 of their report with those taken from the SLA Pdf files at Appendix 1 to show the differences. Could you please as a matter of urgency confirm that I have correctly understood the SLA outputs and that if you intend to rely on the model it will need to be re-run to correct that error.”

LHA response;

- The trip rates are derived from the TRICS database outputs for person trips and use census car mode share data to reflect different levels of accessibility across Medway
- The zoning system is consistent with Medway Ref Case zoning system. Therefore development demand is loaded on top of any existing Reference Case demand for development

DTA comment

“Furthermore, please also provide the remainder of the information requested in my letter 7th July 2020.

- a. Confirmation of growth assumptions in model with respect of cumulative / committed development. Paragraph 2.4.1 of the Sweco report refers but provides no detail, nor confirms compliance with the appropriate WebTag guidance.*
- b. The model validation reports*
- c. Instructions / briefs to Sweco from Medway.*
- d. Detailed assessment trip generation, assignment and distribution*
- e. Detailed model outputs – we have been provided these as appendices but other than the SLA (Appendix 1) none are printable or viewable on pdf to a scale which allows any scrutiny or assessment. Given that I assume you will be relying on the outputs at the inquiry I think it is also necessary that the individual page print outs will need a title sheet on them which confirms their provenance and what the plan shows. At present the outputs are only identifiable by the pdf file name.*

- f. *Response on our request for confirmation that the guidance on TA was followed in full.*

LHA response;

- a. The model has been built to be in line with Highways England “The strategic road network Planning for the future - A guide to working with Highways England on planning matters”. Thus for Medway the model includes cumulative / committed development. As the Medway Model has been built to focus on Local Plan and Planning Applications such as this it means the model doesn’t need to be constrained to TEMPRO growth and TAG in terms of the modelling of schemes for DfT funding bids.
- b. The validation report has been supplied to Medway as part as the Local Plan *work (see following attached emails)*
- c. Medway Council *(awaiting to provide)*
- d. The latest report outlines the process for trip generation but potentially some of the steps were obscured in trying to make the data more accessible. The full trip generation table is provided *(see following attached emails)*

In the report, Sections 2.2 and 2.3 outline the assignment and distribution process. The Select Link Analysis (SLA) outputs show the extents of trip distribution from the model zones with the new development trips.

- e. We have reissued all appendix outputs associated with Sensitivity 1. *(see following attached emails)* The data remains as previously presented but we have added titles and keys to all. For V/C links, we have defined the links in the same way as the V/C junction analysis. Please also note some the outputs relate to subnetworks only, so will only include data for the Subnetwork extents and not the full model
- f. We have followed guidance in terms of highway modelling requirements

I entrust the above is clear, however please do not hesitate to contact me if you require any further information.

Regards

Robert Neave
Principal Transport Officer
Housing, Development and Transport
Medway Council
Civic Headquarters
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

Robert.Neave@medway.gov.uk

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IT'S NOT WORTH THE RISK



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From: [Simon Tucker](#)
To: [neave, robert](#)
Cc: [Jacqueline Aggiss](#); [Peter Hawke](#)
Subject: RE: Land At Pump Farm
Date: 16 November 2020 15:36:00
Attachments: [image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image012.png](#)
[October 2020 Traffic Generation Comparison161120.pdf](#)

Robert,

I have reattached the summary table I sent to you on 30th October, with some colour annotations. This initial issue is two fold:

1. Table 7 of the report has a set of traffic generation assumptions (red line on the attached). When you look at and add up the flows on the network generated by the site as shown on the SLA plots the flows are significantly higher (green line).
2. The traffic movements on the SLA do not replicate / represent the submitted access arrangements. By way of example they show traffic movements on Lower Bloors Lane. This is a cul-de-sac with no development access proposed onto it.

I'd be very happy to have your modelling consultants on the call if that aids the discussion.

Kind regards

Simon Tucker
David Tucker Associates
Transport Planning Consultants

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From: neave, robert <robert.neave@medway.gov.uk>
Sent: 16 November 2020 15:23
To: Simon Tucker <SJT@dtatransportation.co.uk>
Cc: Jacqueline Aggiss <JA@dtatransportation.co.uk>; Peter Hawke <peter.hawke@watermangroup.com>
Subject: RE: Land At Pump Farm

Good Afternoon Simon,

Could you clarify the exact issue,

Pending on the enquiry, I may require to discuss the matter with our modelling consultants and therefore it would be beneficial before any meeting is arranged to understand the exact issue

Regards

Robert Neave

Principal Transport Officer
Housing, Development and Transport
Medway Council
Civic Headquarters
Gun Wharf
Dock Road
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Kent
ME4 4TR

Robert.Neave@medway.gov.uk

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From: Simon Tucker <SJT@dtatransportation.co.uk>

Sent: 13 November 2020 14:17

To: neave, robert <robert.neave@medway.gov.uk>

Cc: Peter Hawke <peter.hawke@watermangroup.com>; Jacqueline Aggiss <JA@dtatransportation.co.uk>

Subject: RE: Land At Pump Farm

Hello Robert,

I am still struggling to correlate the flows in Table 7 with those in the SLA and also how they tie up with the submitted access strategy. Could we have a brief team call next week to talk through that point in particular?

I am currently free anytime except Tuesday PM.

I look forward to hearing from you.

Kind regards

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From: neave, robert <robert.neave@medway.gov.uk>
Sent: 06 November 2020 16:24
To: Simon Tucker <SJT@dtatransportation.co.uk>
Cc: Peter Hawke <peter.hawke@watermangroup.com>
Subject: Land At Pump Farm

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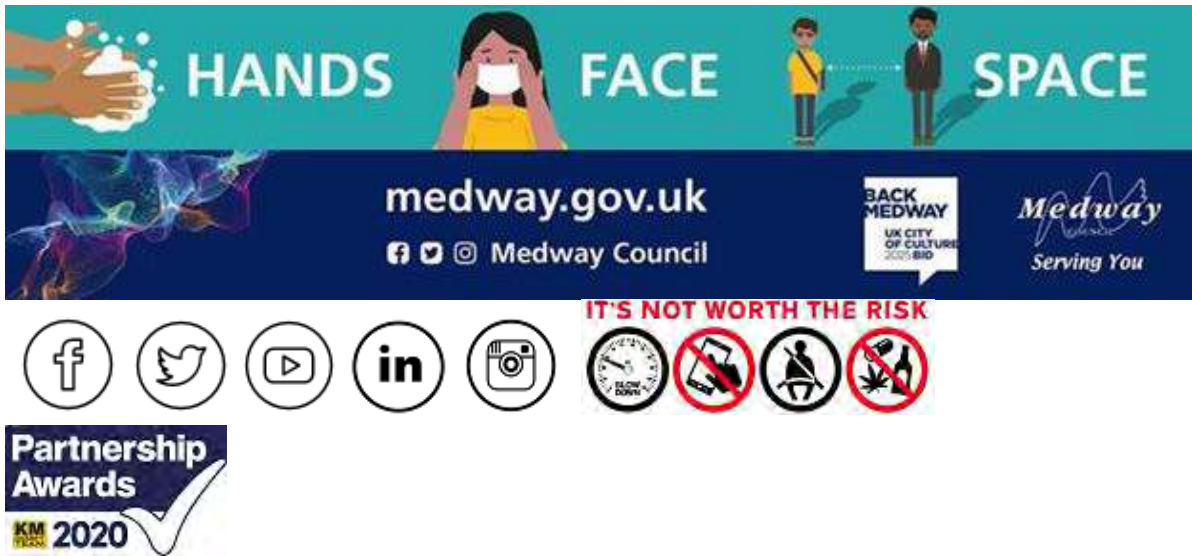
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Regards

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Appendix Q Letter to Simon Tucker RE: SWECO and outstanding matters
(14.12.2020)

Mayfield House
256 Banbury Road
Oxford
OX2 7DE
T: 01865 511444
F: 01865 310653
Your ref: SJT/20230
Our ref: MC/19/1566

Mr Simon Tucker
David Tucker Associates
Forester House,
Doctor's Lane,
Henley-in-Arden,
Warwickshire.
B95 5AW

By email: SJT@dtatransportation.co.uk

14 December 2020

Dear Simon

APP/A2280/W/20/3259868: LAND OFF PUMP LANE, RAINHAM, KENT, ME8 7TJ

I write further to your letter of 8 December 2020, the content of which I have now discussed with officers at Medway Council and SWECO.

At the outset of this letter I should underscore that the Council does not accept the implicit accusation within your letter that the Council has failed to respond to previous requests for information, or has in anyway been uncooperative

In any event, in this letter I address below the information which we understand that you consider remains outstanding namely:

- 1) Instructions to SWECO;
- 2) Growth assumptions included in the model;
- 3) TRICS outputs for the adopted rates and assumptions made in respect of the distribution of development traffic;
- 4) Whether the appellant's TA follows best practice and guidance;
- 5) Clarification in respect of the Select Link Analysis
- 6) Revised modelling

This letter should be read together with the attachments – sent under separate cover given file size and format – which consist of the following:

- a) Emails relating to the instructions given to SWECO
- b) Shape files denoting Centroids and Medways Zones
- c) Growth Data
- d) Growth Factors
- e) TRICS Data's

Instructions to SWECO

On your request for the instructions and briefs from Medway Council to SWECO, I can confirm that there was no one set of instructions or brief in respect of the modelling for the appeal site, but I can provide the following information:

In the summer of 2019, Medway's Planning department was in the process of requesting a technical document from SWECO to provide an evidence base for the local plan. There was an opportunity to increase the scope of this, to allow a modelling assessment of the Pump Lane application.

SWECO provided a Methodology Note at the request of Medway Council on the 16th September 2019 to evaluate the impact of developments within the Lower Rainham Area and creation of a new subnetwork (Subnetwork 7).

On the 17th September 2019, an email was sent from Medway Council to the SWECO, with suggested amendments/confirmation (relating to this application) as follows:

- the timeframe to complete this work.
- requesting the subnetwork include the Beechings Way / Pump Lane junction.
- Requesting "*Sensitivity 1*" relates to the current application for 1,250 new homes, assumed to be built out by 2028 (*reference MC/19/1566*).
- Cross reference to the (very limited) transport mitigation proposed. Details available via <https://publicaccess1.medway.gov.uk/online-applications/>

Then, on the 18th September 2019, SWECO provided a screenshot of the extended network (subnetwork 7) confirming Beechings Way/Pump Lane Junction was included in the subnetwork.

On the 13th November 2019, SWECO provided a map of the assumptions to be made in the scenarios with sensitivity 1 relating to the Pump Lane development.

Later, on 27th November 2019 the first instalment of model results were provided by SWECO to Medway Council, with the second instalment provided on the 29th November 2019.

The modelling results were then sent to Duncan Parr on the 3rd December 2019.

In terms of the revised modelling, the concerns raised by Simon Tucker in his letter dated 7th July 2020 were passed onto SWECO on the 14th July 2020. After discussions with SWECO the scope of the further model run was confirmed on the 27th July 2020.

The report in relation to this further model run (dated 05/10/2020) was received by the Council on the 19th October 2020. Following a review by Peter Hawke, it was then forwarded onto the appellants on the 6th November 2020 via several emails.

Growth assumptions included in the model

You have asked about the growth assumptions in the model, and how they have been derived, referring to PPG at Reference ID: 42-015-20140306.

For future year traffic growth for the 2037 reference case (without development scenario), additional trips to or from Medway zones are based on committed developments and the trip generation associated with those developments as per TAG Unit M4. Please find in the attached spreadsheet (Growth.xls) the sites provided by Medway Council's planning team which are committed development for delivery between the base (2016) and future years (2023, 2028 and 2037). This provides the additional net growth in total residential, employment and other development sites and their scale. The spreadsheet also provides the corresponding

trip rates and the absolute number of person and vehicle trips for each future year, time-period, vehicle type and journey purpose. These committed developments therefore underpin the growth assumptions in the model.

Regarding the PPG on transport assessments to which you refer, this indicates that projections should use local traffic forecasts *such as* TEMPRO (it does not require TEMPRO to be used). In this instance, it should be noted that:

- a) The information concerning committed developments that Medway Council has provided for this modelling will be more up to date and detailed than the assumptions contained within TEMPRO for Medway. It is for this reason that the details of the actual committed developments and their projected trip generations, rather than TEMPRO, has been used to underpin the growth assumptions in the model within the Medway area.
- b) Resultant TEMPRO growth for Medway between 2016 and 2037 is in fact higher than the growth in the Medway model.

Trips to and from zones external to Medway are constrained to Tempro growth.

In order for the appellant to see the resultant change in traffic growth, the spreadsheet called "LRR Growth factors" (as attached) provides the total trips to and from each modelled zone in the Medway model including Medway zones and external zones, for 2016 and 2037 for AM and PM peaks. The absolute growth is also provided as well as a comparison with the higher TEMPRO growth. You will need to refer to a zone plan in order to identify the location of each zone. Please also find attached a shapefile of the Medway zoning system including the boundaries of each zone and the centroid number corresponding to the aforementioned spreadsheet. The full trip matrices are also provided for each future year and time period.

TRICS outputs for the adopted rates and assumptions made in respect of the distribution of development traffic

Attached is an excel file entitled "TRICS information.xls". It contains one sheet that shows the site reference and the corresponding TRICS database lookup tables. The other two excel sheets in the same file are a copy of the TRICS database which includes the site-specific observed trip data.

For the distribution, we have provided the trip matrices (see "LRR Growth factors.xls" file) which show the demand to and from the zone which contains the proposed development to and from all the other Medway model zones. The future year development trip distribution is based on the 2016 base year trip distribution to and from the zone which contains the proposed development. This is based on observed mobile phone and Census origin-destination data. Please refer to the model validation report already provided. In particular, see sections 6 Trip matrix development and "Mobile network data" appendices A and B which contain the methodology and verification accordingly.

Whether the appellant's TA follows best practice and guidance

The Council does not consider that the Appellant, in its TA, has followed best practice, nor applicable guidance. In particular:

First, the Appellant has not followed the Medway 'Transport Assessments' Guidance Note (January 2018), and specifically the protocol it establishes at paragraph 16. Whilst guidance cannot mandate the approach which should be taken, the Appellant decided to progress with its TA on the basis of conventional modelling, and not use the Medway Model in accordance with the Protocol.

Second, the Appellant's original TA made several assumptions regarding internal trip rates. Following requests from the Council for justification of these internalisation rates, the Appellant reduced the assumed percentage of internal trip rates (see Technical Note 1). However, the Appellant has not subsequently updated the modelling assessment within the Transport Assessment, and therefore fails to properly

demonstrate the level of impact from the proposals (which is required in order to apply the requisite policy tests, including NPPF, para 109) . Further, given that Appellant's modelling data is deficient, it is not possible to determine (on the basis of the Appellant's TA alone) whether improvements can be cost effectively provided to mitigate the potential impact to an acceptable degree (as is necessary to apply the requisite policy tests, including NPPF, para 108(c)).

It is unclear whether the Appellant will seek to update its modelling to address this issue ahead of the upcoming inquiry. If it intends to rely on additional modelling, we would expect this to be provided ahead of proof exchange.

Clarification in respect of the Select Link Analysis

Because the zone in which the appeal site is located is slightly larger than the appeal site itself, it is correct to say that the select link analysis undertaken in the October 2020 report is not simply in relation to the entry and exit of the proposed development, but also captures other locations within that zone. While the impact on the results is expected to be minimal, in the additional model runs currently being undertaken (see below) the site will be modelled with its own explicit zone.

Additional Modelling

As was explained at the CMC, and reiterated in an email to Duncan Parr on 9th December 2020, the Council's additional modelling runs are being undertaken primarily to test the implications of adopting the Appellant's proposed trip rates (which are not accepted by the Council). This is not work that the Council was required to undertake, nor even that the Appellant has requested that it undertake. The Appellant are not funding the work. The Council decided, of its own initiative, to undertake the additional model runs in an attempt to determine whether the issues between the parties can be narrowed down at the Inquiry (particularly the dispute concerning trip rates). The Council will provide the additional model runs to the Appellant when they are available. It is hoped that this can be before Christmas, but it may be early in the new year. The deadline for the highway proofs has been adjusted to accommodate this.

Other matters: Highways England

It is also understood that the Appellant has been in discussions with Highways England regarding the impact of the proposed scheme on the Strategic Road Network. It is understood that, subject to a contribution being made in respect of mitigation at M2 Junction 4, Highways England would not sustain their objection. However, the Council is unclear whether any agreement has been reached regarding the level of contribution. Please can the Council be updated on the Appellant's position in respect of this matter at your earliest convenience.

Yours sincerely,



Peter Canavan BA(Hons) MSc MRTPI

Associate Partner

E: Peter.canavan@carterjonas.co.uk

T: 01865 819637

Appendix R LRR Growth Factors AM and PM

| | Base | | 2023 | | 2028 | | 2037 | |
|-------------------------------|----------|----------|----------|----------|----------|----------|----------|----------|
| | From | To | From | To | From | To | From | To |
| Medway | 58138.61 | 58365.81 | 61291.56 | 61184.38 | 62198.53 | 62106.4 | 63540.57 | 63463.93 |
| Aimsun Model Growth Factor | N/A | N/A | 1.054232 | 1.048292 | 1.069832 | 1.064089 | 1.092915 | 1.087348 |
| Tempo Growth Factor | N/A | N/A | 1.0867 | 1.083 | 1.1127 | 1.1188 | 1.1686 | 1.1865 |

| | Base | | 2023 | | 2028 | | 2037 | |
|-------------------------------|----------|----------|----------|----------|----------|----------|----------|----------|
| | From | To | From | To | From | To | From | To |
| Medway | 56747.41 | 59961.91 | 59607.59 | 62957.73 | 60591.71 | 63982.75 | 61877.03 | 65402.44 |
| Aimsun model Growth Factor | N/A | N/A | 1.050402 | 1.049962 | 1.067744 | 1.067056 | 1.090394 | 1.090733 |
| Tempro Growth Factor | N/A | N/A | 1.082 | 1.0849 | 1.1168 | 1.114 | 1.1834 | 1.1738 |