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Mr Simon Tucker  
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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 16<sup>th</sup> September 2019 to evaluate the impact of developments within the Lower Rainham Area and creation of a new subnetwork (Subnetwork 7).

On the 17<sup>th</sup> 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 18<sup>th</sup> 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 13<sup>th</sup> 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 27<sup>th</sup> November 2019 the first instalment of model results were provided by SWECO to Medway Council, with the second instalment provided on the 29<sup>th</sup> November 2019.

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

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

The report in relation to this further model run (dated 05/10/2020) was received by the Council on the 19<sup>th</sup> October 2020. Following a review by Peter Hawke, it was then forwarded onto the appellants on the 6<sup>th</sup> 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 9<sup>th</sup> 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,



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