

Northfleet Harbourside National Highways Consultee Comments

226728/N15

Introduction

1. This note has been prepared to provide a review of the traffic and transport comments made by National Highways (NH) in response to the Northfleet Harbourside Planning application (ref 2022/1064).
2. We have prepared an initial review of each relevant comment with information that has been prepared and submitted as part of the submitted Transport Assessment (TA) and/or the Transport Assessment Addendum (TAA).

Comment 1

The residential parking ratio falls significantly below the presented Kent Residential Parking Standards (2021), but one space per dwelling for one-, two- or three-bedroom units and two spaces per dwelling for four-bedroom units.

In order to justify the residential trip generation site selection, with low parking availability, the Car Park Management Plan must provide clear measures to mitigate the risk of overspill parking.

The Car Park Management Plan must provide clear measures to mitigate the risk of overspill parking.

3. Car parking at the site has been set out in consideration of the latest guidance from both Kent County Council (KCC) and Ebbsfleet Development Corporation (EDC), as well as local car ownership data.
4. Car parking spaces would be provided to residents on a first come first serve basis. As such, parking permits would be issued on a block-by-block basis. These spaces would be suitably split across the neighbourhood areas at the site based upon unit type.
5. Furthermore, it is proposed that several car club vehicles will be provided at the proposed mobility hub and across the neighbourhoods of the site. Based upon the current guidance set out by EDC, a minimum of 3 car club vehicles would be required and so this will be further assessed and confirmed through the subsequent Reserved Matters applications across the site to ensure provision can be secured as each neighbourhood is completed.
6. Due to the outline nature of the application, the precise number of parking spaces for each land use has not been derived but a Framework Car Park Management Plan (CPMP) has been developed to identify a number of measures to limit and manage any demand for overspill parking. It is anticipated that this Framework would be secured through a Planning Condition and form the overarching strategy from which more detail CPMP documents could be prepared and secured through subsequent Reserved Matters Applications.

Comment 2

We observe that the residential trip rates and the selection criteria behind these presented in the main body of the TA in Table 5.4 differ from those presented in Appendix G. Clarification from the applicant is required before these trip rates can be accepted.

Applicant to clarify discrepancies between residential trip rates in Table 5.4 and Appendix G of the Transport Assessment.

7. As part of the TAA the trip generation for all land uses has been revisited to ensure a robust and relevant assessment case. This is presented in Section 5 of the TAA. The residential trip rates used, and the methodology adopted is set out below. This has been formally approved with KCC.
8. To forecast the anticipated trip generation associated with this element of the site, residential trip rates per dwelling have been extracted from the TRICS database using the criteria set out below:
 - Land Use: Residential
 - Category: Private Flats
 - Regions: England excluding Greater London
 - Floor Area / Dwelling: 6-215 dwellings
 - Date Range: 01/01/14-11/05/22
 - Selected Locations: Edge of Town, Suburban Area, Neighbourhood Centre
 - Parking Ratio: Sites with a parking ratio of greater than 1.5 have been excluded
9. The results of this search and the forecast resulting trip generation is presented in **Table 1** below.

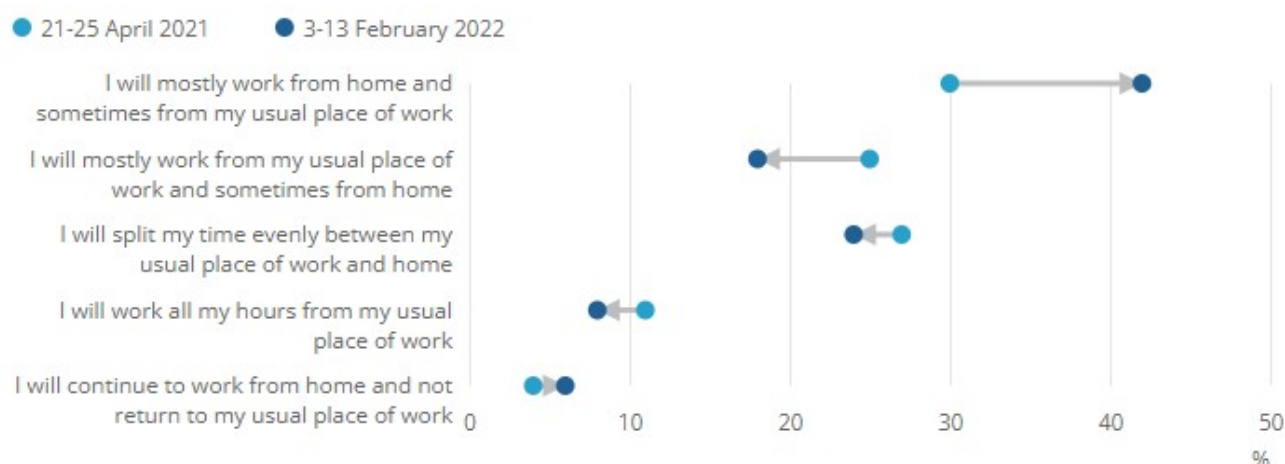
Table 1: Residential Trip Rates and Generation

Use	Peak Hour	Trip Rates		Trip Generation	
		Arrival	Departure	Arrival	Departure
Residential (per unit)	AM	0.056	0.175	196	613
	PM	0.161	0.085	564	298
	Daily	0.969	1.056	4367	4759

10. The pandemic forced many people to work from home and since then, working habits have changed now that many employers and employees are aware of the options available to them. Unfortunately, the 2021 Census data for 'Method of Travel to Work' is flawed as it asked people how they travelled at the time of the pandemic and not how they would normally travel. This resulted in a dataset that was not representative of non-pandemic travel habits. However, to rectify this and provide a usable dataset, the Office for National Statistics (ONS) has been undertaking an 'Opinions and Lifestyle Survey'.

11. The chart in **Figure 1** below shows the future plans of workers who worked from home because of the pandemic (opinions taken between April 2021 and February 2022). The data clearly demonstrates that a large proportion of the working population intend to spend at least some of their working hours from home.

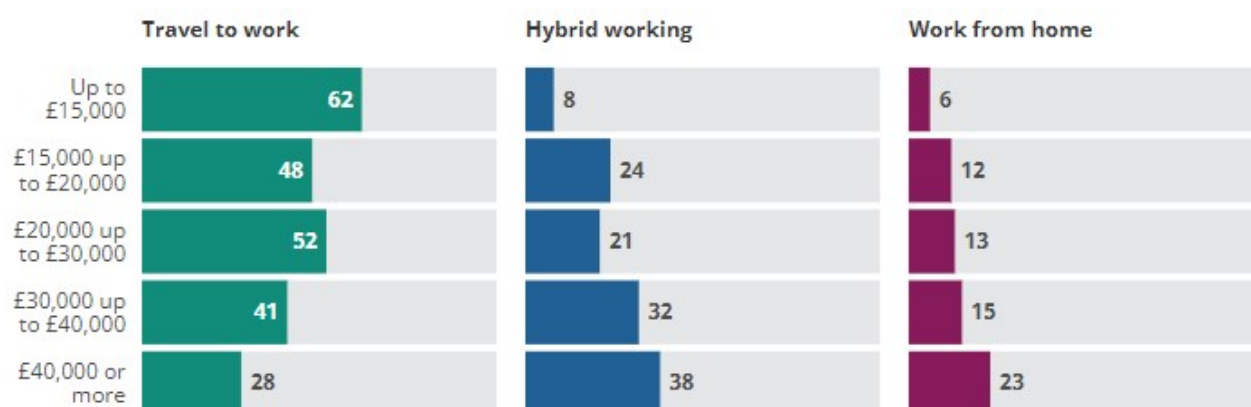
Figure 1: Working Habits and Preferences



Source: Office for National Statistics – Opinions and Lifestyle Survey

12. The chart in **Figure 2** below shows the current working arrangements of employees by income bracket. The data shows that hybrid and homeworking increases by income bracket. Across all salary bands the average proportion of those hybrid working is 21% and those always working from home is 12%.

Figure 2: Working Patterns



Source: Office for National Statistics – Opinions and Lifestyle Survey

13. To forecast the extend to which working from home therefore impacts the peak hour trip generation, a review of typical journey purpose but time of day has been completed. This has been based upon data gathered from the Department for Transport National Travel Survey for the period 2013-2017 (Table NTSQ03004a).

14. This data identified that between 08:00-09:00 commuting and business trips accounted for 39% of all trips, whilst between 17:00-18:00 these accounted for 45% of all trips. We have therefore combined these percentages with the 12% referenced above to determine the % working from home for all trips made during the peak hours (12% multiplied by 39% and 45% respectively).
15. Based on the above data it is considered reasonable to assume that during the AM and PM network peak hours respectively 4.7% and 5.4% of residents forecast to travel to work using TRICS trip rates, would in fact not travel on any given day as they always work from home. Therefore, a 4.7% and 5.4% internalisation factor has been applied to the residential car driver trip generation during the AM and PM network peak hours respectively to account for this. To ensure this assessment is robust, no further reduction for those that hybrid work is being applied.
16. For the Saturday assessment, A review of the parameters selected to establish the weekday trip rates for the residential element of the site identified that there was no Saturday data available for any of the selected site. A review was therefore completed to establish which sites offered both weekday and weekend survey data from within the TRICS database. The findings were that the category of 'houses privately owned' was the only category to provide this.
17. We have therefore extracted trip rates for the weekday and weekend for 'houses privately owned' and then derived a factor to allow up to generate a more representative trip rate for private flats on a Saturday. The criteria used to complete this for both a weekday and a Saturday was therefore as set out below:
 - Land Use: Residential
 - Category: Houses privately owned
 - Regions: England excluding Greater London
 - Floor Area / Dwelling: 6-4344 dwellings
 - Date Range: 01/01/15-09/11/22
 - Selected Locations: Edge of Town, Suburban Area, Neighbourhood Centre
18. The results of this search illustrating the peak hour trip rates for the AM and PM weekday and Saturday are presented in **Table 2** below.

Table 2: Residential Trip Rates

Use	Peak Hour	Trip Rates	
		Arrivals	Departures
Residential (per unit)	AM (08:00-09:00)	0.146	0.378
	PM (17:00-18:00)	0.343	0.159
	Saturday (17:00-18:00)	0.262	0.148

19. Using the above data, we have derived a weekday to Saturday factor by proportioning the change from weekday to weekend for the land use. This has then been applied to the approved weekday trip rate for private flats to derive the daily trip rates for the proposed residential uses. The factors derived are set out below in **Table 3**.

Table 3: Residential Weekday to Saturday Trip Factor

Use	Peak Hour	Trip Rate Factor	
		Arrivals	Departures
Residential (per unit)	07:00-08:00	0.67	0.39
	08:00-09:00	0.59	0.55
	09:00-10:00	0.98	1.07
	10:00-11:00	1.34	1.39
	11:00-12:00	1.17	1.37
	12:00-13:00	1.11	1.15
	13:00-14:00	1.05	1.24
	14:00-15:00	1.14	0.91
	15:00-16:00	0.67	0.73
	16:00-17:00	0.8	0.99
	17:00-18:00	0.78	0.97
	18:00-19:00	0.62	0.85
	19:00-20:00	0	0
	20:00-21:00	0	0

20. These factors have then been applied to the approved weekday residential trip rates to derive the Saturday trip rates and ultimate trip generation associated with the residential uses on site. These are presented between 12:00 and 15:00 in **Table 4** below.

Table 4: Residential Trip Rates

Use	Peak Hour	Trip Rates		Trip Generation	
		Arrivals	Departures	Arrivals	Departures
Residential (per unit / total)	12:00-13:00	0.070	0.084	245	294
	13:00-14:00	0.054	0.099	187	347
	14:00-15:00	0.073	0.070	255	245

Comment 3

This methodology used for this land use may not be representative of the future retail element of the proposed development, resulting in an inaccurate assessment of trips related to this land use. It is requested that more conventional retail park land use trip rates are provided (ideally K - retail park excluding food) for comparison against the factory outlet centre subcategory and then proceed with the highest set of trip rates for a suitable assessment.

Applicant to provide a comparison between the Factory Outlet Centre and Retail Park excluding Food (or other appropriate Retail subcategory) trip rates, to provide a suitable assessment of this land use's trip rates.

21. The retail units proposed as part of the retail village will be no larger than 560m², with the significant majority smaller than 375m². The location and form of these retail units is prescribed by the 'Proposed Development Building Edge Deviation Plan (Ground Floor and Podium)' which is included as Figure 4.7 in Chapter 4 of the Environmental Statement.
22. There is flexibility within the site layout, whereby routes, spaces and building boundaries are not completely fixed but are subject to limits of deviation. The limits of deviation with regards to building edge vary from +/- 0.5m to +/- 5m of deviation, as specified on the Parameter Plans.
23. As a result of this limitation in the massing and area of the retail units, trip rates have been extracted from the TRICS database for comparable retail uses using the criteria set out overleaf. The proposed retail component of the site is expected to be a mix of open-air retail units similar to Bicester and Ashford Shopping villages. Therefore, to capture suitable mix of units the Factory Outlet Centres category has been used as typical retail would not provide for the variety of potential units without splitting the areas into specific, more defined land uses.
24. These rates have been extracted per parking space due to the fact that the proposed development has a finite supply of vehicular parking on site, and there is very limited scope for travelling visitors to park in the proximity of the retail village off site. Therefore, parking provision is a constraining factor with regards to the number of trips that can visit the retail component of the site. By using a trip rate per space, the turnover of parking will provide an accurate representation of the trip generation.
 - Land Use: Retail
 - Category: Factory Outlet Centres
 - Regions: England excluding Greater London
 - Floor Area / Dwelling: 3,857-23,350
 - Date Range: 01/01/14-07/12/14
 - Selected Locations: Edge of Town, Suburban Area, Neighbourhood Centre
25. The above selection criteria only yielded two results from the TRICS database, which were both surveyed on a Sunday. The TRICS database has a limited selection of comparable sites suitable for use within the last 10 years.
26. However, by extending the search back to the year 2000, two sites are available from 2001 that were surveyed on a Saturday. Furthermore, the sites reside in Kent, the Ashford outlet, and Essex, the Freeport Shopping Centre in Braintree and are also located in close proximity to a train station.
27. Applying the proposed quantum of retail development to the trip rates provided a trip generation and parking accumulation for a Saturday, as shown in **Table 5** overleaf.

Table 5: Saturday Retail Trip Generation and Parking Accumulation

Time Period	Trip Rates			Trip Generation			Accumulation
	In	Out	Total	In	Out	Total	
08:00-09:00	0.097	0.026	0.123	68	18	86	50
09:00-10:00	0.258	0.047	0.305	181	33	214	197
10:00-11:00	0.382	0.112	0.494	267	78	346	386
11:00-12:00	0.420	0.229	0.649	294	160	454	520
12:00-13:00	0.320	0.318	0.638	224	223	447	522
13:00-14:00	0.463	0.385	0.848	324	270	594	576
14:00-15:00	0.506	0.465	0.971	354	326	680	605
15:00-16:00	0.395	0.472	0.867	277	330	607	551
16:00-17:00	0.274	0.529	0.803	192	370	562	372
17:00-18:00	0.109	0.427	0.536	76	299	375	150
	0.022	0.246	0.268	15	172	188	0

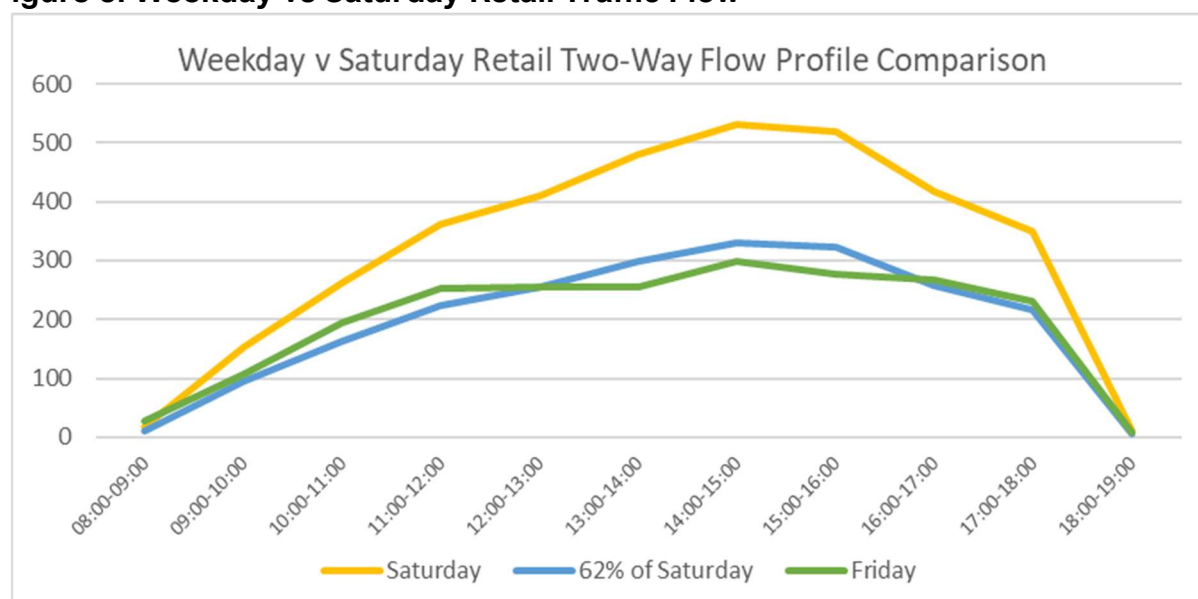
28. Table 5 shows that the Saturday peak hour for two-way trips is between 14:00 and 15:00, with a flow of 680 vehicles. This is also when the peak parking accumulation of 605 vehicles (86% full) is expected to occur. This demonstrates that the car park is suitably sized to accommodate a typical level of demand for a Saturday, with sufficient capacity for seasonal variations.
29. To derive a weekday trip generation, TRICS has been consulted to find a site that has survey data on a weekday and a Saturday. Then the relationship between the two can be used to calculate a typical weekday trip generation.
30. There is one site within the TRICS database within the Retail - Factory Outlet Centres category that has survey data on a weekday and a Saturday. To find this site the region criteria had to be extended to cover all of the UK and it resulted in one site located in Wales.
31. **Table 6** (overleaf) shows a comparison between the weekday and Saturday trip rates and trip generation.

Table 6: Weekday and Saturday Retail Trip Rate and Trip Generation Comparison

Time Period	Weekday						Saturday					
	Trip Rates			Trip Generation			Trip Rates			Trip Generation		
	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total
08:00-09:00	0.025	0.014	0.039	18	10	27	0.017	0.008	0.025	12	6	18
09:00-10:00	0.115	0.039	0.154	81	27	108	0.168	0.051	0.219	118	36	153
10:00-11:00	0.188	0.091	0.279	132	64	195	0.254	0.121	0.375	178	85	263
10:00-11:00	0.208	0.154	0.362	146	108	253	0.314	0.201	0.515	220	141	361
11:00-12:00	0.189	0.176	0.365	132	123	256	0.322	0.264	0.586	225	185	410
12:00-13:00	0.185	0.178	0.363	130	125	254	0.378	0.309	0.687	265	216	481
13:00-14:00	0.214	0.212	0.426	150	148	298	0.406	0.352	0.758	284	246	531
14:00-15:00	0.193	0.203	0.396	135	142	277	0.344	0.397	0.741	241	278	519
15:00-16:00	0.159	0.224	0.383	111	157	268	0.193	0.402	0.595	135	281	417
16:00-17:00	0.077	0.253	0.330	54	177	231	0.111	0.389	0.500	78	272	350
17:00-18:00	0.003	0.009	0.012	2	6	8	0.001	0.013	0.014	1	9	10
18:00-19:00	0.025	0.014	0.039	18	10	27	0.017	0.008	0.025	12	6	18
Daily	1.556	1.553	3.109	1,089	1,087	2,176	2.508	2.507	5.015	1,756	1,755	3,511

32. The data shown in Table 6 shows that weekday retail trips are typically 62% lower than that of a Saturday. This can be demonstrated using the two-way daily flows as an example: $2,176 \div 3,511 = 0.62$. To demonstrate this graphically, the weekday and Saturday profiles have been plotted along with the Saturday profile at 62%. This chart is shown overleaf in **Figure 3** demonstrates that even on different days of the week, the distribution of trips throughout the day is largely similar and therefore, the Saturday data multiplied by a factor of 0.62 can be used as a proxy for weekday data.

Figure 3: Weekday vs Saturday Retail Traffic Flow



33. To validate this approach, the 2015-2019 National Travel Survey (NTS) was consulted to further understand the relationship between retail trips made during the week and on a Saturday. Weekday retail trips are typically 62% of the level of retail trips made on a Saturday as demonstrated by the NTS table extract shown below in **Figure 4**.

Figure 4: NTS Trips Review

Select years ¹ :	2015/19						
Trips per person per year							
Purpose	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Shopping	24	23	23	24	28	39	23

34. The average number of weekday trips is 24, which when divided by 39 (Saturday trips), equates to 0.62. Therefore, the weekend trip generation has been reduced to 62% to provide a weekday retail trip generation, as shown in **Table 7** overleaf.

Table 7: Weekday Retail Trip Generation and Parking Accumulation

Time Period	Trip Generation			
	In	Out	Total	Accumulation
08:00-09:00	42	11	53	31
09:00-10:00	112	20	132	122
10:00-11:00	166	49	214	240
11:00-12:00	182	99	282	322
12:00-13:00	139	138	277	323
13:00-14:00	201	167	368	357
14:00-15:00	220	202	421	375
15:00-16:00	171	205	376	342
16:00-17:00	119	230	349	231
17:00-18:00	47	185	233	93
18:00-19:00	10	107	116	0

Comment 4

The applicant states that the subsequent retail trip rates for the weekend reflected a parking accumulation exceeding the plans 700 spaces, with a factor of 0.72 derived to reduce the parking accumulation down to 700 vehicles. Whilst the 0.72 reduction factor reduces the parking accumulation to below 700, there is no explanation as to how this has been derived. It is noted that the arrival and departure figures do not add up to reflect the parking accumulation totals. Further clarity on this methodology is therefore required from the applicant.

Applicant to provide calculations showing how factor of 0.72 has derived and provide clarity on accumulation figures discrepancies.

35. The trip generation exercise completed within the TA has been reviewed and as above, the parking accumulation is demonstrated to be accommodated by the proposed levels of parking for the retail uses.

Comment 5

*It is considered that making use of constrained trip rates reflecting the retail parking offer may not reflect the actual retail trip generation, with customers potentially parking in other nearby areas across the site, by legitimate or illegitimate means. We therefore recommend that the Car Parking Management Plan is submitted for review, or further details provided on how parking across each land use will be controlled before the **action** can be accepted.*

Applicant to provide either the Car Parking Management Plan for review, or further details on how parking areas will be controlled.

36. A framework Car Parking Management Plan has been submitted as part of the application and updated as part of the TAA. This will form the basis for the management of parking across the site with update, refined plans produced in support of the future Reserved Matters Applications submitted for the site.

These will be secured through Planning Conditions and include further details on the specific parking measures to be implemented across each development phase.

Comment 6

We see that the Applicant has used 2021 National Travel Survey data to calculate the weekday retail trips, as a proportion of the weekend retail trips. The applicant states that weekday retail trips are typically 66% of the level of weekend retail trips, with the figures calculated accordingly. The data behind the calculation of the 66% figure has not been provided and no further evidence has been presented. This is requested.

Applicant to present data/evidence behind the calculation of the 65% figure to calculate weekday retail trips.

37. Further information on the methodology adopted for the derivation of the weekday retail trip rates is provided in response to Comment 3 above.

Comment 7

Furthermore, it is unclear why a weekday set of TRICS trip rates for the retail land use has not been provided. It is therefore recommended that a weekday trip generation assessment is conducted using TRICS and compared to the trip rates produced using the National Travel Survey data factor.

Applicant to present weekday retail trip rates from TRICS, to use as a comparison to those derived from the National Travel Survey factor.

38. A weekday trip generation exercise has been completed as part of the TAA and is presented in the response to Comment 3 above, including the reasoning behind the adopted approach.

Comment 8

The applicant has used the pub/restaurant category to calculate the food & beverage land use trips. The weekday PM peak trip rates are acceptable. The weekday AM trip rate was not found in the TRICS output; despite being included in Table 5.4. Clarification on how the AM trip rate calculated is required.

Applicant to explain methodology behind Food & Beverage weekday AM peak trip rates.

39. The TRICS outputs obtained for the food and beverage uses do not have any recorded trip rates for the AM peak and as such there was no data to present for the AM peak period. **Table 8** overleaf shows the TRICS outputs for the AM and PM peak periods.

Table 8: Food and Beverage Trip Rates and Generation

Use	Peak Hour	Trip Rates		Trip Generation	
		Arrival	Departure	Arrival	Departure
F&B (per 100 sqm)	AM	0	0	0	0
	PM	2.461	1.619	168	110
	Daily	19.878	19.535	1352	1324

Comment 9

The hotel trip rates and the selection criteria behind these presented in the main body of the TA in Table 5.4 differ from those presented in Appendix G. Clarification from the applicant is required before these trip rates can be accepted.

Applicant to clarify discrepancies between residential trip rates in Table 5.4 and Appendix G.

40. The hotel trip rates have been reviewed as part of the TAA with updated rates adopted. These are set out below and in **Table 9** below.

- Land Use: Hotel, Food & Drink
- Category: Hotels
- Regions: England excluding Greater London
- Bedrooms: 50-400 beds
- Date Range: 01/01/14-10/08/22
- Selected Locations: Edge of Town, Suburban Area, Neighbourhood Centre

Table 9: Hotel Trip Rates and Generation

Use	Peak Hour	Trip Rates		Trip Generation	
		Arrival	Departure	Arrival	Departure
Hotel (per bedroom)	AM	0.1	0.197	30	59
	PM	0.203	0.11	61	33
	Daily	1.796	1.76	537	526

41. The weekend trip rates are also presented below and overleaf in **Table 10** overleaf.

- Land Use: Hotel, Food & Drink
- Category: Hotels
- Regions: England and Wales excluding Greater London
- Bedrooms: 50-400 beds

- Date Range: 01/01/14-10/08/22
- Selected Locations: Edge of Town, Suburban Area, Neighbourhood Centre

Table 10: Hotel Trip Rates and Generation

Use	Peak Hour	Trip Rates		Trip Generation	
		Arrivals	Departures	Arrivals	Departures
Hotel (per bedroom / total)	12:00-13:00	0.202	0.182	61	55
	13:00-14:00	0.232	0.121	70	36
	14:00-15:00	0.162	0.273	49	82

Comment 10

The community centre trip rates have used the “edge of town centre” category, which is inconsistent with the other TRICS category selections and does not reflect the site’s location. An explanation for this selection or an amended trip generation is required before these trip rates can be accepted.

Applicant to provide clarification on use to “Edge of Town Centre” category for Community Centre trip generation.

42. As part of the TAA the community centre trip rates have been reviewed with the ‘Edge of Town Centre’ category removed from the selection criteria.

Comment 11

No trip generation assessment has been presented for the expanded stadium. As this land use forms an integral part of the proposed development, an assessment of the traffic generated is required.

Applicant to conduct a trip generation assessment for the expanded stadium.

43. As Ebbsfleet United Football Club currently has permission for their stadium to accommodate up to 6,000 spectators (Planning ref. 2015/0081), a match-day trip generation exercise has not been undertaken for a football match as this already exists on the network. The overall capacity will be condition at this level until such time as a further assessment considering an 8,000 capacity is provided.
44. In consideration of the worst-case Saturday assessment, impacts are considered to be greatest on a non-matchday due to the linked trips that are expected between spectators and retail / food and beverage. The inclusion of spectators would, in effect, reduce the single purpose trips associated with these uses thereby reducing the net impact on the network.

Comment 12

The internalisation discounts to the food & beverage and local services land uses are accepted. A 20% discount to the office land use appears generous and is considered to be a potential overestimation due to the greater catchment area of this land use. The Applicant is therefore requested to provide evidence supporting the 20% internalisation discount to the office land use.

Applicant to provide evidence supporting the 20% internalisation discount to the Office land use.

45. The internalisation factor adopted for the office land use has been reviewed with evidence supporting the newly applied rates of 4.7% and 5.4% provided in response to comment two above.

Comment 13

The Applicant intends to make use of the Kent Transport Model (KTM) as part of the traffic impact assessment. It is understood that the model outputs are not yet available. The Applicant has conducted junction modelling assessments of the A2/A2260 roundabouts which have been the focus of this review.

We note that weekday AM, Interpeak and PM models are included within the KTM, with no Saturday model available. It has been proposed to estimate Saturday traffic flows by using local Automatic Traffic Count data to calculate Interpeak to Saturday peak factors.

We agree that a Saturday peak model is required due to the retail and stadium element of the development proposals. However, basing this assessment off the weekday Interpeak model is not considered to likely result in an accurate assessment due to the differing flow profiles.

46. Jacobs have completed a thorough analysis of both weekday and weekend MCC (10 locations) and ATC data (six locations) in developing their Saturday scenario within the KTM. The methodology has been reviewed and approved by KCC for assessment purposes.

Comment 14

Standalone Junction Modelling – A2/A2260 slip roads

The Applicant states that due to errors recorded within the traffic surveys, supplementary surveys will be conducted with additional modelling subsequently completed. This will be included within the supplementary TA. We will provide further comment on the junction models when this is received. We expect that the model files themselves along with annotated geometry drawings, queue length data for validation and any signal data will be provided for review.

In the absence of a Saturday peak scenario within the KTM, we recommend that Saturday peak Manual Classified Count surveys are carried out for the A2/A2260 junction roundabouts and the A2 Ebbsfleet junction on and off-slips, in order to provide accurate baseline data this scenario.

Applicant to conduct Manual Classified Count surveys on a match and non-match day Saturday to calculate the Saturday peak baseline scenario.

47. All standalone modelling has been completed using the traffic flows outputs directly from the KTM model to ensure a robust and consistent approach. This therefore removes the impact of road works or errors in observations for any single day.

Comment 15

We see that the Applicant has modelled a 2022 base year, 2031 future base and 2031 with development scenarios. It is understood that 2031 is anticipated to be the year of the full build out of the development.

In line with the DfT circular 02/2013 paragraph 25, an opening year assessment is required. Additionally, a future assessment year is required, either 10 years from the registration of the planning application, or the end of the Local Plan period, whichever is the greater. As the Gravesham Local Plan covers the period running from 2011-2028, the year 10 years from registration will be greater. The application was registered in 2022, therefore an assessment of 2032 would be anticipated. However, the applicant has modelled a future year of 2031 in line with the anticipated future year a full build out and occupation.

Applicant to carry out opening year assessment at the year the site is first expected to be occupied. This assessment needs to consider the development as fully built out.

Applicant to use a future assessment year of 2032 for the modelling assessment.

48. Discussions took place with both KCC and Jacobs in determining an appropriate future year for assessment. The KTM model currently has a 2030 future year scenario but not a 2032 scenario. It was agreed that due to the significant financial implications of preparing a new development year scenario, it would be more appropriate to utilise the 2030 model year.
49. This scenario includes for all current committed development as well as those significant developments which are considered to come forward during this time period. Furthermore, this aligns with the guidance set out by DfT circular 01/2022 paragraph 50 which sets out that an opening year assessment is required. 2030 aligns with the forecast for the build out of the site.

Comment 16

The Applicant has not included specific committed developments within the modelling assessment, stating that these flows would be covered by the growth factors, subject to review by KCC. We expect however that the applicant will provide either confirmation of this approach by KCC, or a list of committed development agreed by KCC.

Applicant to provide either confirmation from KCC that committed development flows do not specifically need to be modelled, or a list of committed developments agreed with KCC to factor into the junction modelling assessment.

50. As traffic flows have been extracted directly from the KTM model, all committed developments have been included in our assessments.

Comment 17

The applicant has assumed that development traffic will distribute in accordance with existing turning movements. We consider this approach to be too imprecise to enable a thorough and accurate

assessment to be carried out and a more targeted approach is needed, making use of the KTM or data sources such as Census Journey to Work data.

Applicant to provide a more detailed distribution analysis for the junction modelling assessment.

51. The traffic distribution adopted has been revised to utilise that set by the KTM model.