

# Tech Note

## Spatial Planning Framework Commission

|             |                                                                                       |                  |            |
|-------------|---------------------------------------------------------------------------------------|------------------|------------|
| Job number: | K437                                                                                  |                  |            |
| Job title:  | Land surrounding Ebbsfleet United Football Club                                       |                  |            |
| To:         | Nigel De Wit                                                                          | cc:              | Kevin Bown |
| Topic:      | Review of Submitted Technical Note and Transport Assessment Addendum for P/A 20221064 |                  |            |
|             | Prepared:                                                                             | Checked/Approved |            |
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| Date:       | 02/10/2023                                                                            | 03/10/2023       |            |

Throughout this response any **ACTION POINTS** for the applicant are shown as **bold underlined**.

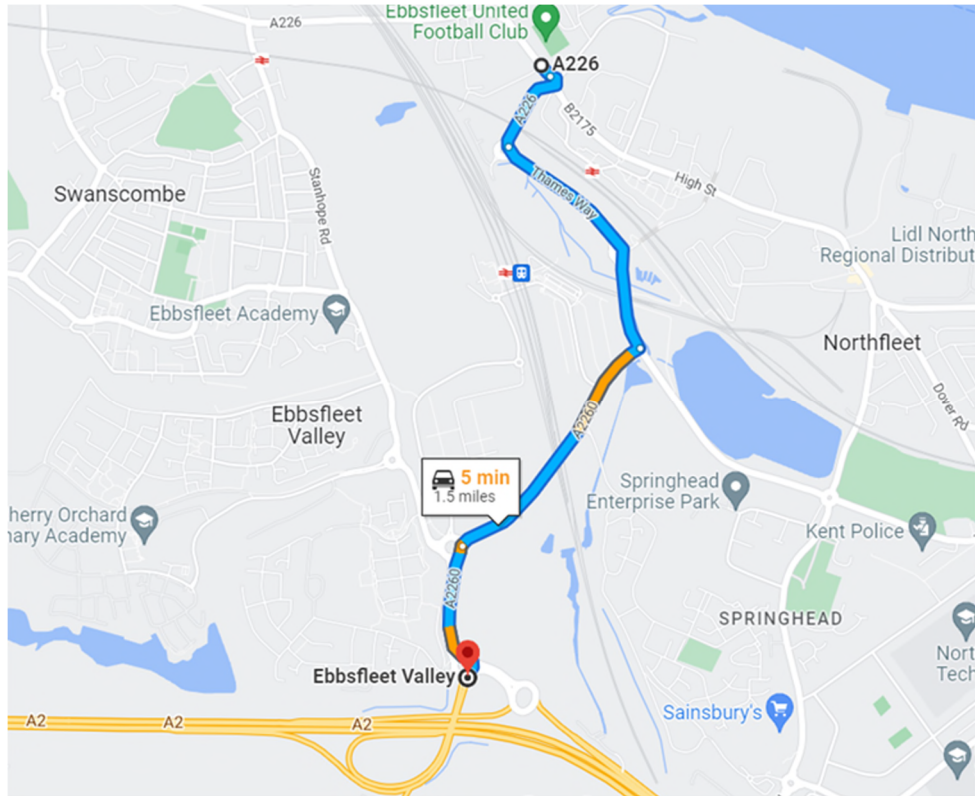
## Introduction

- 1 Planning application 20221064 is for Outline planning application with all matters reserved, except for the primary means of access and road layout, for a phased mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation / remediation works, and the development of residential units (Use Class C3), Class E uses including floorspace for retail Class E(a)), food/beverage and drinking establishments (Use Class E(b)), local services (Use Class E(c)), indoor sport/recreation/fitness (use Class E(d)), healthcare space (Use Class E(e)), creche/nursery uses (Use Class E(f)), office floorspace (Use Class E(g)(i)), a new multi-use stadium with associated business and leisure facilities (sui generis), hotel (Use Class C1), community uses floorspace (Use Class F2). The phased redevelopment will include other sui generis uses, delivery of open space and significant realignment of the road network including the A226 Galley Hill Road / Stonebridge Road / Lower Road with hard / soft landscaping, car and cycle parking provisions, infrastructure works, ancillary and associated works.
- 2 The local planning authority (LPA) is Gravesham Borough Council (MSDC).

### Site Location

- 3 As per the map below, the application site is located approximately 1 ½ miles from the A2/A2260 junction, which is the section of SRN in closest proximity to the site.

**Figure 1: Site Location Plan**



Source: Google Maps

## Background

- 4 National Highways was originally consulted on planning application 20221064 in November 2022 and provided a NHPR holding response dated 5 December 2022. The NHPR identified issues relating to trip generation, internalisation and distribution and junction modelling. The holding response was subsequently renewed in March, June and September 2023.
- 5 A Transport Assessment Addendum (TAA) was submitted to the LPA on 4 September 2023.
- 6 No further information was received until 11 September 2023, when a Technical Note (TN) response seeking to address National Highways' comments was submitted directly by the applicant.
- 7 In their email to National Highways the applicant states that there is no new information supplied in the TN which hasn't been provided within the TAA however the TN focuses on providing a response in turn to each of the actions raised by NH. On this basis, this review focuses on the TN response but refers to the TAA where appropriate.

# Technical Note Review

## Overview

- 8 The TN provided by the applicant is structured in a way whereby each comment raised by National Highways has been commented on in turn to aim to provide an appropriate clarification to each action raised.
- 9 The review set out below goes through each action previously identified by the applicant in ***bold italics*** and identifies where the applicant's commentary resolves the action. Any new actions are identified in **bold underlined** text.

## Residential Trip Generation

- 10 ACTION: Applicant to clarify discrepancies between residential trip rates in Table 5.4 and Appendix G of the Transport Assessment.**
- 11** As part of the TAA the trip generation for all land uses has been revisited and therefore the discrepancies previously identified have been superseded. It is noted that the trip generation has been formally approved by KCC.
- 12** TRICS has been used to forecast the anticipated trip generation associate with the residential elements of the site, 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
- 13** The location areas selected and the parking ratio of lower than 1.5 is acceptable. It is noted that the dwelling range which includes sites up to 215 dwellings is considerably lower than the proposed 3,500 dwellings across the site, however the individual blocks and phases are anticipated to be more aligned with this size.
- 14** It is noted that the selection criteria include only private flats. **The applicant should confirm the proportion of flatted development given the site selection criteria used applies 100% private flats category.**
- 15** It is agreed that the 2021 Census Data is flawed given the timing of the COVID-19 pandemic, and therefore the use of the Office for National Statistics 'Opinions and Lifestyle Survey' has been used to provide an evidence base to justify a proportion of level of home working to apply to the residential trip generation. The statistics show that the survey found that 12% of respondents always worked from home and 21% undertook a form of hybrid working with a combination of home and usual place of work.
- 16** The applicant has extracted data from the National Travel Survey (2013-2017) which found 39% of all trips made in the 08:00-09:00 period and 45% in the 17:00-18:00 period were commuting and business trips. Consequently, the applicant has applied these percentages to the 12% of individuals working permanently from home and generated a trip reduction factor of 4.7% and 5.4% in the AM and PM peak. No reduction factor for hybrid working has been applied to ensure a robust methodology.
- 17** Given the evidence presented the proposed reduction is considered acceptable and the details which come forward as part of the Reserved Matters schemes must ensure that appropriate provisions are in place across the masterplan to facilitate home working.
- 18** **The applicant should provide a vision/supporting measures for the development to outline how this level of trip internalisation can be supported.** Due consideration should be given to home and street layouts, broadband infrastructure, safe and secure cycle parking, and access to local amenities and open space in support of these aims, while mobility or micro mobility hubs should be provided. In addition, high-powered and open-access EV charge points should be installed where developments include on-street or communal parking to support the government's

objective to end the sale of new conventional petrol and diesel cars/vans by 2030 and HGVs by 2040, and its commitment to decarbonise transport by 2050.

- 19 A weekend trip factor has been derived by comparing residential rates from houses privately owned, due to limited site availability for private flats category. This has then been applied to the weekday trip rates to obtain a Saturday trip rate and generation. This approach is acceptable in principle however **clarification is sought to confirm that the weekday trip rates used to generate the factor do not use those with the home working reduction factor applied given this would not be representative of a weekend.**

## Residential Parking Levels

- 20 Given that the residential parking ratio falls significantly below the presented Kent Residential Parking Standards (2021), with one space per dwelling for one-, two- or three-bedroom units and two spaces per dwelling for four-bedroom units, the following action was previously identified:
- 21 ***ACTION: The Car Park Management Plan must provide clear measures to mitigate the risk of overspill parking.***
- 22 The Parking Management Plan refers to parking spaces being allocated on a first come first serve basis, it is not clear whether this will be first come first serve at the time of the purchase of the flat and how this will be managed when units are re-sold. **Clarification is sought on the process for allocating parking permits through the first come first served principle referred to in the Parking Management Plan. Commitment should be made to prohibit residents from parking on any internal streets of the development.**

## Retail Trip Generation

- 23 ***ACTION: 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.***
- 24 The applicant notes that the retail units proposed as part of the retail village will be no larger than 560m<sup>2</sup>, with the significant majority smaller than 375m<sup>2</sup>. 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.
- 25 The applicant advises that the proposed retail component of the site is expected to comprise a mix of open-air retail units similar to Bicester and Ashford shopping villages and therefore factory outlet centres category has been used. The rates are extracted per parking space, due to constrained parking numbers proposed on site and very limited scope for travellers to park in proximity of the retail village off site. Parking is therefore a constraining factor with regards to the number of vehicular trips that can visit the retail component of the site.
- 26 The parking accumulation figures are presented suggesting that the peak accumulation occurs between 14:00-15:00 on a Saturday at 605 spaces occupied and the car park of 700 spaces is suitably sized to accommodate a typical level of demand.
- 27 ***ACTION: Applicant to provide calculations showing how factor of 0.72 has derived and provide clarity on accumulation figures discrepancies.***
- 28 The above action has been resolved as part of the accumulation assessment to demonstrate sufficient parking capacity is provided for the targeted demand.

## Retail Parking Demand

- 29 National Highways previously flagged that, 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.

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

**31** The CPMP proposes that an active parking management strategy will be implemented, with measures to include:

- Residents' parking spaces managed through a permit parking scheme;
- Parking restrictions introduced on internal roads within the site;
- 4-hour parking restriction at the Stadium car park to prevent residential use; and
- Private enforcement of parking restriction on unadopted site roads.

**32 The Parking Management Plan should provide greater detail on the car parking restrictions on the internal roads at the site.** The report refers to parking being restricted at prevent parking at all times along the Fasttrack bus route, implying that restrictions will not be implemented at all times along other routes.

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

**34** The additional methodology information presented to derive a weekday factor is accepted.

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

**36** The additional information presented in Table 6 of the TN satisfactorily resolves this action.

## **Food and Beverage weekday AM Trip Rates**

**37 ACTION: Applicant to explain methodology behind Food & Beverage weekday AM peak trip rates.**

**38** The applicant has clarified and provided trip rate tables showing that the pub/restaurant category which was used to calculate the food and beverage land use trips does not have any trips recorded in the AM peak, which may be due to the facilities being closed during this time. This action is therefore satisfactorily resolved.

## **Hotel Trip Rates**

**39 ACTION: Applicant to clarify discrepancies between hotel trip rates in Table 5.4 and Appendix G.**

**40** Updated rates for the hotel use have been used and the selection criteria and proposed rates and trip generation is considered appropriate and accepted.

## **Community Centre Trip Generation**

**41 ACTION: Applicant to provide clarification on use to "Edge of Town Centre" category for Community**

**42** The removal of the Edge of Town Centre site selection is welcomed, and the updated trip generation is accepted.

## Stadium Expansion

- 43 ACTION: Applicant to conduct a trip generation assessment for the expanded stadium.**
- 44** The applicant has confirmed that a match day assessment has not been undertaken given that Ebsfleet Football Club currently has permission for their stadium to accommodate up to 6,000 spectators. This has been corroborated via a review of the Transport Statement prepared for the planning application (planning reference: 2015/0081) and this is confirmed. Rather than increase spectator provision to 8,000 the applicant commits to constrain the overall capacity to 6,000 to align with the current approved assessment until such time as a further assessment considering an 8,000 capacity is provided.
- 45** This approach is acceptable to subject to a condition being recommended by National Highways at the appropriate stage of the planning process. Such a condition would state that the overall stadium must only accommodate a maximum of 6,000 spectators unless and until based on the submission of suitable transport evidence and provision of any necessary transport mitigation a higher threshold is agreed. **The applicant is invited to prepare draft condition wording for National Highways review and comment.**

## Office Trip Generation

- 46 ACTION: Applicant to provide evidence supporting the 20% internalisation discount to the Office land use.**
- 47** 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% in the AM and PM peaks provided in response to the residential trip generation. This level of internalisation has been provided with sufficient evidence and is accepted.

## Kent Transport Model

- 48** Within the TAA and overview of any changes made to the KTM assessment model and its application, referring to scoping meetings held with KCC to agree the modelling methodology. It is noted that NH were not involved in the scoping stage.
- 49 ACTION: Applicant to conduct Manual Classified Count surveys on a match and non-match day Saturday to calculate the Saturday peak.**
- 50** The applicant confirms that a Saturday model has been developed specifically for the TAA given that one did not previously exist within the KTM. ATC and manual classified counts have been undertaken to allow for Saturday models to be developed.
- 51 ACTION: 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.**
- 52 ACTION: Applicant to use a future assessment year of 2032 for the modelling assessment.**
- The KTM model currently has a 2030 future year scenario but not a 2032 scenario and given the significant financial implications of preparing a new development year scenario KCC agreed with the applicant to take forward a 2030 assessment year.
- Given that this aligns with the year of opening we accept this approach.
- 53 ACTION: 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.**

- 54 The applicant has confirmed that as traffic flows have been extracted directly from the KTM model, all committed developments have been included. This is acceptable.
- 55 ***ACTION: Applicant to provide a more detailed distribution analysis for the junction modelling assessment.***
- 56 The applicant notes that the distribution uses the KTM model, however **we request clarification and detail on how the distribution/assignment has been applied for each of the proposed land uses.**

## **Traffic Impact Assessment**

- 57 The TAA presents the results of the traffic impact assessment, including the VISUM outputs from the KTM Model. Until such time whereby the above actions are satisfactorily resolved, we have not reviewed the traffic modelling at this stage. Following agreement on the aforementioned actions, we will review and provide any further comments on the results presented in the Traffic Impact Assessment at that stage.

## **Construction Traffic Management Plan**

- 58 We note that Vectos has submitted a Framework Construction Traffic Management Plan (CTMP) as part of its TAA. It is expected that this will form the basis for more detailed iterations of the CTMP (or a CMP – see below) as proposals for the site and an associated construction timetable are developed. As such, the CTMP offers an early-stage view of the traffic impacts that construction of the proposed development might generate.
- 59 The CTMP identifies a phased construction over a 9-year period and forecasts up to 128 HGV movements per day during the works. The primary route to the site for construction vehicles is expected to be via the A226 and A206, the latter of which links to M25 junction 1a. A secondary route is given as via the A2 and A2260.
- 60 The CTMP does not provide a trip distribution assessment for construction HGV journeys but given the site's location and identified access routes, it is likely that a high proportion of these will utilise the SRN. On this basis it can be estimated that up to 12 HGVs per hour can be expected to use the SRN throughout the 10-hour (08:00-18:00) construction day. The CTMP provides a commitment to schedule these movements outside the peak network hours for traffic as far as is practicable and this is welcomed.
- 61 The expected numbers of site staff are not provided but it is stated that 75% of these are expected to arrive by car. Without forecasts of site staff numbers we are unable to assess the potential impacts of these journeys on the SRN. The CTMP should provide forecasts of the staffing requirements of the construction to allow this assessment.
- 62 Works will take place within different areas of the site by construction phase. The CTMP commits to provision of wheel-washing facilities at differing locations around the site as the works progress. We also welcome the provision of a mechanical road-sweeper which is also to be deployed as required.
- 63 The CTMP does not provide a commitment to the sheeting of vehicles carrying loose loads to and from the development, and this is required.
- 64 In terms of the CTMP, the above actions (which may not be exhaustive) are provided for the applicant's *future* reference. As such, they are intentionally not bold underlined. At a suitable stage of the planning process, we suggest that National Highways recommends a suitable planning condition in relation to CTMP matters.

## Travel Plan

- 65 A Framework Travel Plan is provided in Appendix M of the TAA, this provides an overview of existing conditions, measured proposed to support the sustainable nature of travel to and from the development site including a mobility hub, cycle parking and the Fastrack bus service. Modal Share targets are provided including baseline and future years. **The residential baseline mode shares for rail are only 3% for residential and 1% for commercial. Given the proximity to Ebsfleet International Rail Station these mode shares for rail are very low and should be revisited with consideration for the constrained levels of parking provided at the Site. The mode shift targets should be set which relate to the trip generation and baseline mode share set out in the TA.**
- 66 Additionally, **the targets set out in Table 4.1 refer to achieving a 10-percentage point reduction in single occupancy vehicle movements however the future year targets have an increased proportion of vehicle trips and must be revisited.**
- 67 Further additional actions for the applicant to consider, particularly in relation to funding and phasing are set out below.
- **Firm financial commitment should be made in the FTP with regards to funding for a range of measures (including infrastructure, incentive, and information-based measures) proposed in the short, medium, and long term**
  - **Detail should be provided on the phasing of any proposed measures relative to any phasing of the development**
  - **The TP should clearly outline the responsibilities of the different parties involved with regards to implementing, monitoring, and funding the Travel Plan**
  - **The TP monitoring strategy should be designed to monitor the level of residual vehicle trips predicted in the TA**
  - **The level of funding to be made available for further measures should the FTP fail to achieve its targets should be clearly stated in the document**
  - **A sustained monitoring and management strategy to confirm that vehicle trip targets are being met**
  - **A plan detailing the remediation process in the event that targets are not being met.**

## Conclusion

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| <b>Holding recommendation – further evidence required</b> |
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