



National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

From: Regional Director South East
Operations Directorate
South East Region
National Highways
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To: Gravesham Borough Council – FAO Ms Genna Henry
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CC: transportplanning@dft.gov.uk
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Council's Reference: 20221064

Location:

Land surrounding Ebbsfleet United FC, Bounded by Lower Road, Railway Line, Grove Road and The River Thames, Northfleet, Gravesend.

Proposal:

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.

Referring to the consultation on a planning application dated 16 November 2022 referenced above, in the vicinity of the A2 at Ebbsfleet Junction that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A — National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

Signature: 	Date: 5 March 2023
Name: Marius Pieters	Position: Assistant Spatial Planner National Highways
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¹ Where relevant, further information will be provided within Annex A.

Annex A National Highway's assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommendation:

that planning permission not be granted for a specified period:

Reasons:

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of the A2 Ebbsfleet junction.

National Highways currently recommends that planning permission not be granted (other than a refusal if the Council so wishes) for a period of six months from the date of this response until 5 September 2023 to allow the applicant to resolve the outstanding matters.

We require further information to be provided by the applicant on this application in order that an informed decision can be made in relation to the potential impacts of the development on the strategic road network. In particular, the following comments should be passed onto the applicant:

Residential Parking Levels

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.

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.

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

Trip Generation

Residential

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.

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

We will provide further comment on the residential trip rates when the above point has been clarified.

Retail

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 a comparison against the Factory Outlet Centre subcategory and then proceed with the higher set of trip rates for a suitable assessment.

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.

The applicant states that the subsequent retail trip rates for the weekend reflected a parking accumulation exceeding the planned 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.

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

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 recommended 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 above factor can be accepted.

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

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.

ACTION: Applicant to present data/evidence behind the calculation of the 66% figure to calculate weekday retail trips.

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.

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

We will provide further comment on the retail trip rates when the above points have been clarified.

Food & Beverage

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 was calculated is required.

ACTION: Applicant to explain methodology behind Food & Beverage weekday AM Peak trip rates.

Office

The office trip rates are accepted.

Hotel

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.

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

Community Uses

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.

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

Local Services

The office trip rates are accepted.

Stadium

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.

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

Trip Internalisation

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 over-estimation 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.

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

Net Trip Generation Assessment

The Applicant has stated that as a worst case, no existing trip generation has currently been factored into the traffic impact assessment. This is accepted by us.

Traffic Assessment

Kent Transport Model

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.

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 for this scenario.

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

Assessment Years

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 DfT Circular 02/2013 paragraph 25, an opening year assessment is required. Additionally, a future assessment year is required, either ten 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 ten years from registration will be greater. The application was registered in 2022, therefore an assessment year of 2032 would be anticipated. However, the applicant has modelled a future year of 2031 in line with the anticipated future year of full build-out and occupation.

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.

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

Background Growth

The Applicant has used TEMPro to derive growth factors for the future year assessment. We will review this information alongside the model files when received.

Committed Developments

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 developments agreed by KCC.

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.

Trip Distribution

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.

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

The above represents our *initial* requirements. As the analysis progresses, it is expected that we will have further requirements

Conclusion

Given the above, it is currently not possible to determine whether the application would have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN (the tests set out in DfT Circular 02/2022 [particularly paras 8 to 11] and MHCLG NPPF2021 [particularly paras 110 to 113]). This response details the steps that need to be taken in order to resolve this issue.

In light of the above, National Highways currently recommends that planning permission not be granted (other than a refusal if the Council so wishes) for a period of six months from the date of this response until 5 September 2023 - to allow the applicant to resolve the outstanding matters.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

5 March 2023 Update:

We note that there appears to have been no response to our last NHPR, dated 5 December 2022, uploaded onto the application webpage or sent to National Highways direct.

In providing a response in due course, the applicant needs to take into account that the Department for Transport, on 23 December 2022, issued, a new version of their Circular entitled *Strategic road network and the delivery of sustainable development*. The old version was called C2/2013. The new version is C1/2022 and can be found at:

<https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development> .

In accordance with normal planning and transport policy, applications must be determined on the basis of the policy framework that exists at the time of the determination, unless it can be demonstrated that it would be appropriate to rely on previous or other policy.

Therefore, in addition to responding to the specific requirements set out in our original NHPR, the applicant will also need to:

- Set out how their application complies with C1/22 generally; or provide reasons why C2/13 or some other policy should apply

In light of the above, National Highways currently recommends that planning permission not be granted (other than a refusal if the Council so wishes) for a period of six months from the date of this response until 5 September 2023 to allow the applicant to resolve the outstanding matters.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.