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Gravesham LDF
Planning and Regeneration Services
Civic Centre
Gravesend
Kent
DA12 1AU

26th November 2007

Dear Mr Doyle,

**Gravesham Borough Council
Consultation on Core Strategy – Key Issues and Options**

- 1 Thank you for your letter inviting the Highways Agency to comment on the Gravesham Consultation on Core Strategy Key Issues and Options. I apologise for the lateness of my reply
- 2 The Highways Agency, on behalf of the Secretary of State, is responsible for the management, maintenance and enhancement of the strategic road network in England. In relation to spatial planning and development control, the Highways Agency seeks to be actively engaged in all stages of the planning process, and part of our participatory role is to aim to deliver sustainable development policy in cooperation with Local Planning Authorities (LPAs) and Regional Planning Bodies (RPBs), as defined in the Department for Transport's Circular 02/2007 (*Planning and the Strategic Road Network*).
- 3 The Highways Agency therefore looks to your Council's LDF to promote sustainable strategies, policies and land allocations that should reduce the need to travel by car on the local and strategic road network.
- 4 In relation to Gravesham, the Highways Agency has responsibility for the operation of the A2 trunk road. There is currently a major Targeted Programme of Improvement scheme in progress to the south of Gravesend which comprises the widening and realignment of the A2 between Pepperhill and Marling Cross junctions.
- 5 We would caution however that the LDF should not rely upon the provision of additional capacity on the trunk road network. While there may be scope for some localised capacity and operational improvements, the emphasis within the LDF should be on reducing the need to travel and focus on sustainable modes.

- 6 We realise that you have provided a questionnaire that invites responses to the Core Strategy document. However we are sure you will appreciate that it is difficult to capture the Highways Agency's response in this format, and we have therefore provided specific responses that can be cross-referenced to topics addressed in the consultation document. We have attempted an assessment of the development plan document from the transport perspective against the *Tests of Soundness* set out in paragraph 4.24 in PPS12. For ease of reference, the *Tests of Soundness* are repeated below:-

Procedural

1. It has been prepared in accordance with the local development scheme;
2. It has been prepared in compliance with the statement of community involvement, or with the minimum requirements set out in the Regulations where no statement of community involvement exists;
3. The plan and its policies have been subjected to sustainability appraisal;

Conformity

4. It is a spatial plan which is consistent with national planning policy and in general conformity with the regional spatial strategy for the region... and it has properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas;
5. It has had regard to the authority's community strategy;

Coherence, consistency and effectiveness

6. The strategies/policies/allocations in the plan are coherent and consistent within and between development plan documents prepared by the authority and by neighbouring authorities, where cross boundary issues are relevant;
7. The strategies/policies/allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base;
8. There are clear mechanisms for implementation and monitoring; and
9. The plan is reasonably flexible to enable it to deal with changing circumstances.

Planning Policy Statement 12 – Preparation of a local development document (2004)

- 7 In accordance with PPS12, comments have been underlined where we have concerns about the *soundness* of the document.

Delivering the Major Development Sites

- 8 With regard to **Northfleet Embankment**, reference is made to the improvement of the road network and links between the development and the A2 (page 27). Northfleet Embankment development is a large scale site situated on the A226 London Road corridor. The statement in the Core Strategy implies that enhancements to the road network between the site and the A2 will be required if development proceeds. The proximity of the site to Gravesend town centre and

- Ebbsfleet International Station should enable the site to function as a sustainable development, with good access to public transport services and connectivity to the footpath/cycleway network.
- 9 The Core Strategy identifies **Canal Basin**, located to the east of Gravesend Town Centre, as a major development site. This development has the potential to be a significant trip generator. To minimise the potential impact of the development on the surrounding road network, the Highways Agency recommends and supports proposals to extend the Fastrack network east of Gravesend Town Centre to Canal Basin. Fastrack would provide a viable public transport alternative to the car, linking the development with the town centre, Ebbsfleet and beyond.
 - 10 The Core Strategy identifies **Christianfields and Southfields** developments as major sites within Gravesham. These sites are located in the southern area of Gravesend. The sites are in closer proximity to the strategic road network than Gravesend Town Centre, and therefore have the potential to be less sustainable. The Highways Agency recommends that local bus services are enhanced/re-routed to serve these developments.
 - 11 DfT Circular 02/2007 clarifies that Government policy is no longer to cater for unrestrained road traffic growth. The Highways Agency will expect to see proposals taken forward for all major sites that include sustainable measures to reduce traffic impact on the surrounding road network. Improved links to the A2 should be delivered in terms of enhancement of the existing road network rather than the construction of new links. This will align with PPS12 Test of Soundness 4 and DfT Circular 02/2007.

Housing

- 12 The Core Strategy refers to the allocation of **9,300** new residential dwellings required to be built between 2006 and 2026 in **Gravesham**, as set out in the South East Plan. As an evidence-base, the KTS SATURN Forecast Model incorporates demand based on 7,900 dwellings in the 2025 horizon year scenario (not including unallocated development) which implies a shortfall of 1,400 residential dwellings. The absence of trip demand for Swanscombe Peninsula East in the latest KTS Model may account for a proportion of this shortfall.
- 13 The South East Plan Policy H1 sets out provision for housing in the region. For Gravesham, housing allocation is set at 9,300, as described above. For Dartford, the provision is 15,700 dwellings. The total for Gravesham and Dartford is 25,000 dwellings.
- 14 There is concern however that the allocation to Dartford and Gravesham in the KTS SATURN Forecast Model is not consistent with the South East Plan or Core Strategy assumptions. There is potential therefore that the KTS Model could be under or over estimating the impact of some developments on parts of the Kent Thameside road network for the horizon years. The Highways Agency requests

that housing allocation is clarified to ensure developments in Gravesham are appropriately modelled. This will enable the Highways Agency to plan for the future operation of the strategic road network. This will align with PPS12 Test of Soundness 4 and 6.

Employment

- 15 The Core Strategy recognises the commencement of Integrated Kent Franchise domestic rail services through Ebbsfleet International station in late 2009 as a key trigger point for delivering business units and employment potential in the surrounding area. The Highways Agency fully supports this sustainable approach to focusing employment around public transport hubs as it has the potential to reduce the number of trips made by car.
- 16 The Highways Agency suggests that this approach should be extended to Gravesend town centre, which will also benefit from IKF services when they begin operation through Gravesend station. The town centre would provide an ideal location for new employment development, as it is served by rail, local bus and Fastrack services.
- 17 The Core Strategy acknowledges the employment floorspace target which is set out in the South East Plan for Gravesham, although it is not explicitly stated. The South East Plan indicates 431,000 m² of committed business floorspace for Gravesham. The Core Strategy should recognise other areas to locate employment space, other than the allocation at Ebbsfleet, which could be delivered by 2009 to take full advantage of the new IKF services.

Retail

- 18 The Core Strategy considers the location of additional retail warehousing within Gravesham. As with other types of retail, the document reflects a sustainable approach to planning in accordance with PPS6 and PPG13, with emphasis on focusing development in Gravesend town centre and promoting it as the main retail centre in Gravesham.
- 19 The Core Strategy states that expansion of the **Imperial Retail and Business Park** on the western edge of Gravesend town centre will be priority for exploring retail potential, with a new retail park on a major site being a less desirable alternative. The Imperial Retail and Business Park site is accessible by a variety of modes and could therefore be regarded as a sustainable location. The Highways Agency would discourage retail warehousing at a new location, unless improvements to public transport services and good accessibility by sustainable transport modes to Gravesend town centre could be assured.
- 20 The expansion of Imperial Retail and Business Park may however result in an increase in traffic on the surrounding road network. Depending on the type of retailers that locate at an expanded site, there is potential for an increase in car

trips from the wider area, beyond Gravesend. Motorists attracted to the expanded retail park could use the A2 trunk road, potentially adding further constraint to the road network and associated junctions, beyond what is currently assessed in the latest KTS SATURN Forecast Model. The Highways Agency would expect that local planning authorities will assess the impact on the trunk road network of retail park development options, in order to more fully align with PPS 12 Test of Soundness 4 and 7.

Culture, leisure and tourism

- 21 The Core Strategy outlines the potential to establish **key centres of excellence** in sports. The document also affirms that the existing highway network may not be sufficient to cope with traffic generated by a large scale facility, a stance with which the Highways Agency concurs. The document suggests that more modest, public transport orientated facilities could be provided.
- 22 The Highways Agency is concerned that a number of more 'modest' facilities could still potentially be significant traffic generators.
- 23 The concept of 'centres of excellence' suggests that facilities may attract trips from the wider region, potentially utilising the strategic road network. The Highway Agency would expect that the local planning authority will assess the impact on the local and strategic road network if such facilities are taken forward, in order to more fully align with PPS 12 (paragraph 4.24) Test of Soundness 4 and 7. The HA would also request that emerging policies would minimise demand at source and require the mitigation of strategic road impacts throughout all stages of development planning, implementation and operation, in accordance with criteria set out in PPS 8, Policy OS 4 – Intensive Sports Facilities.

Transport and Air Quality

- 24 The Core Strategy considers the approach to tackling **air quality**. The current approach involves the cooperation of the local planning authority and development applicant in exploring and delivering solutions to reduce the impact on air quality. The Core Strategy puts forward an alternative approach which it does not intend to take forward, which involves the enforcement of a tariff to finance air quality improvement measures.
- 25 There are more indirect methods of financing air quality improvements. Charging for car parking at developments in addition to associated improvements to public transport services, may lead to a shift from car to more sustainable modes and potentially an improvement, or mitigation of impact, in air quality.
- 26 The Core Strategy does however appear to convey a sustainable ethos towards transport planning and development, demonstrated by the Objectives set out in section 10 of the document, and aligns itself reasonably with PPS12 Test of Soundness 4.

Thames Riverside

- 27 The Core Strategy suggests the relocation of industrial riverfront activities to make way for other uses such as residential. It is acceptable to assume that heavy industry and residential land uses do not mix, and certainly would not constitute a sustainable development. On this basis, the document suggests the relocation of industrial facilities to 'more suitable' locations when they become available.
- 28 The Highways Agency requests that regard is made to the sustainability of new sites in relation to the estimated trip distribution to/from the site/s and potential impact on the surrounding road network. In relation to transport, traffic assessments of the new sites will need to be carried out, and assessment of the sites in the KTS SATURN Forecast Model to determine possible traffic impact. Decision making on new industrial sites should have regard to requirements set out in PPS4 (paragraph 3.3). This will align with PPS12 Test of Soundness 7.
- 29 Should sites be proposed in close proximity to the strategic road network, the Highways Agency would suggest that policies should require the careful consideration of likely employee travel patterns and the development of demand management measures to reduce potential impacts on the surrounding road network. The policy should also signify that developers will be expected to mitigate any residual impact upon the strategic road network, as set out in DfT Circular 02/2007 (paragraph 36).
- 30 The Core Strategy indicates the potential to incorporate buildings of 'significant' height and massing at the site of the former power station at Northfleet Embankment, mirroring the previous scale of industrial uses in the area. The Highways Agency queries this approach to redevelopment and requests clarification. The Highways Agency has concerns that development of a similar height and mass to the former power station, but serving a different function, be it residential, B1 office space and/or leisure/sport, could potentially generate a higher number of trips.
- 31 Whilst the Highways Agency supports new employment development which is located in urban centres where a range of opportunities for sustainable travel exist, such as at Northfleet Embankment, the Highways Agency would recommend that the scale and impact of the development is subjected to a full assessment to ensure impact on the surrounding road network is minimised.
- 32 The Highway Agency would expect that the local planning authority will assess the impact of such development on the local *and* strategic road network, in order to more fully align with PPS 12 Test of Soundness 4 and 7. The HA would also request that emerging policies would minimise demand at source and require the mitigation of strategic road impacts throughout all stages of development planning, implementation and operation, in accordance with criteria set out in PPS 4 and DfT Circular 02/2007.

Evidence Base

- 33 PPS12 states the need for the provision of an up-to-date information 'base' in providing the basis for defining and assessing spatial planning objectives in the LDF. PPS12 states:-

"The evidence base is critical to the preparation of local development documents. Local planning authorities should ensure that the delivery of housing and other strategic and regional requirements is not compromised by unrealistic expectations about the future availability of infrastructure, transportation and recourses." (4.9)

- 34 The KTS SATURN Forecast Model, maintained and developed by Jacobs on behalf of Kent County Council is an evidence-base tool for identifying development opportunities and constraints across Kent Thameside. It is important that spatial planning assumptions supplied in the Gravesham LDF, Dartford LDF, the South East Plan and the KTS SATURN Forecast Model are coherent. The Highways Agency utilises the model to assess the potential impact of major development sites on the surrounding road network, and enables us to appropriately plan and respond to potential constraints on the strategic road network.
- 35 The Highways Agency has recognised a number of inconsistencies between the assumptions supplied in the Core Strategy, the South East Plan and those which underpin the latest version of the KTS SATURN Forecast Model.

Housing assumptions

- 36 The Core Strategy document summarises land use quantum for sites within Gravesham which are considered to be major developments. The document indicates the number of residential dwellings for each of the sites.
- 37 The Highways Agency has concerns that the land use quantum represented in the Core Strategy document is not aligned with the South East Plan (SEERA, 2006). Policy H1 (Housing Provision) states that Gravesham should make provision for 9,300 dwellings between 2006 and 2026. For Dartford, the provision is 15,700 dwellings, indicating a total provision for 25,000 dwellings across Kent Thameside.
- 39 A number of major sites are identified where the majority of the housing provision will be delivered. The table below summarises the figures stated in the Core Strategy and highlights a possible shortfall in total housing provision against the figure identified in the South East Plan.
- 40 It appears unlikely that the 9,300 total housing provision for Gravesham will be achieved, even with an allocation specified for Northfleet Embankment West and Swanscombe Peninsula East.

Housing (no. of dwellings)	Gravesham Local Development Framework – Core Strategy Key Issues and Options
Ebbsfleet	944 (have permission within Gravesham, 480 at Springhead Quarter)
Northfleet Embankment East	Up to 1,800
Northfleet Embankment West	Not Specified
Canal Basin	1,000
Land east of Canal Basin	839
North East Gravesend	258
Christianfields	426
Southfields	210
Swanscombe Peninsula East	Not Specified
	5,477

- 41 The South East Plan states that there is likely to be a slower pace of development in Gravesham in the initial period of 2006-2016, compared with Dartford, as major sites come forward. The South East Plan acknowledges that this has been reflected in the lower overall amount of housing development in Gravesham. Policy KTG1 (Amount and Distribution of Housing Development) indicates that in Gravesham, 2,900 dwellings should be provided between 2006 and 2016, and 6,300 dwellings provided between 2016 and 2026. This is not reflected in the Core Strategy.
- 42 It is key that the total housing provision identified in the South East Plan for Gravesham is accepted and taken forward in the Gravesham LDF in order to achieve objectives for the quality of development and sustainable communities, delivering affordable dwellings and supporting regeneration and economic growth

in the region. All major sites and housing allocations should be broadly set out as part of the Core Strategy.

- 43 In order to fulfil a requirement of PPS12 that the local planning authority should seek the involvement of relevant groups and organisations, including the Highways Agency, in the development of the evidence base, it is recommended that further assessment of development land use quantum is conducted and the appropriate level of development is represented in the KTS SATURN Forecast Model.
- 44 Until the total housing provision for Gravesham is better defined, the Core Strategy risks failure to align with PPS12 (paragraph 4.24) Tests of Soundness 4, 6 and 7.

Employment assumptions

- 45 With regard to the allocation of **Employment** development, the Core Strategy document specifies employment floorspace for Ebbsfleet (Springhead Quarter), Northfleet Embankment East and land east of Canal Basin, totalling 76,140 m², shown in the table below.

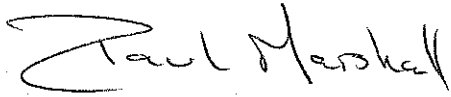
Employment (Gross Floor Area m ²)	Gravesham Local Development Framework – Core Strategy Key Issues and Options
Ebbsfleet	50,000 B1a Springhead Quarter
Northfleet Embankment East	25,000 'employment uses'
Northfleet Embankment West	Not Specified Includes possible new cement import terminal and rail freight connection
Canal Basin	Not Specified
Land east of Canal Basin	1,140
North East Gravesend	Not Specified
Christianfields	Not Applicable
Southfields	Not Applicable
Swanscombe Peninsula East	Not Specified
	76,140

- 46 The South East Plan indicates 431,000 m² of committed business floorspace for Gravesham. Policy KTG5 of the South East Plan states:-
- “Land and premises for business and other employment uses will be provided for each urban area in a scale sufficient to match the growth in housing and labour supply and reduce the need to travel long distances for work...”*
- 47 The South East Plan goes on to state:-
- “In Dartford and Gravesham the scale of new employment planned at Ebbsfleet and other sites is sufficient, and if fully developed will reduce out-commuting from the area and draw its workforce from a wider catchment.”* (page 283)
- 48 There is clearly a need to broadly identify sites of major employment potential within the Core Strategy. Employment is vital in supporting the number of dwellings allocated to the Borough and reducing out-commuting by offering local employment opportunities. It is unclear if the total employment floorspace target set out in the South East Plan will be met by the major sites identified in the Core Strategy.
- 49 There is potential in the future for people who chose to move to Gravesham to seek employment outside of the Borough if there is not a sufficient supply of jobs in the local area. This will oppose the policy approach set out in the South East Plan.
- 50 To fulfil a requirement of PPS12 that the local planning authority should seek the involvement of relevant groups and organisations, including the Highways Agency, in the development of the evidence base, it is recommended that further assessment of development land use quantum is conducted and the appropriate level of development is represented in the KTS SATURN Forecast Model.
- 51 Without providing a broad outline of how and where the target of 431,000 m² of employment floorspace will be met, the Core Strategy risks failure to align with PPS12 Test of Soundness 4.

Consultation on Allocation of Sites

- 52 You have requested that the Highways Agency supply you with details of specific sites which are considered vital for inclusion in the Allocation of Sites document. These sites would presumably be in addition to those outlined in the Core Strategy. The Highways Agency does not wish to put forward any further sites for consideration in the Allocation of Sites at this time, but request that all major sites considered in the Core Strategy document be considered in more detail, responding to the Highways Agency's concerns raised in this letter.
- 53 We hope that the above information is helpful to you, please do not hesitate to contact me to discuss anything further.

Yours sincerely



Paul Marshall
NS South East SE