

## Comments on Canterbury District Transport Strategy 2014-2031.

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### General Points

1. We would like to mention initially that the Canterbury Society is fully supportive of the general tenor of this District Transport Strategy DTS, i.e. the fact that it has a substantial basis in “sustainability” and the related ideal of shifting transport emphasis from the use of private cars towards the transport hierarchy of “walking, cycling and public transport”.

2. Paragraph 30 of the NPPF (1<sup>st</sup> sentence) notes “Encouragement should be given to (traffic) solutions which support reductions in greenhouse gas emissions and reduce congestion.” While many of the intentions of the DTS do support reductions in greenhouse gas emissions, the Strategy as a whole does not reduce congestion. Thus, according to VISUM modelling (Appendix 1), traffic levels in the Canterbury District are expected to be higher in 2031 than they are at present.

3. Throughout the DTS there appears to be a paucity of Policies. Given the importance of improving transport conditions in the District this is rather disappointing. Additionally, those policies that are included tend to be stated such that they are rather “anaemic” - they need to be stated in a manner that conveys conviction.

4. The words “sustainability” or “sustainable” are used throughout the DTS with little real understanding of their true meaning. Being used in what is a rather flippant way means that their true concept has lost its original meaning. So, Policy 8.1 says “We will support a pattern of development that facilitates the use of sustainable modes of transport.” But the Local Plan is proposing a pattern of development in South Canterbury that, according to their own data, will considerably increase road traffic congestion in the area. Since increased traffic congestion is patently not sustainable, Policy 8.1 is simply not creditable. It is important to note that a House of Commons committee has found that the words “sustainable” and “sustainability” have been used incorrectly in the NPPF (see <http://www.publications.parliament.uk/pa/cm201012/cmselect/cmcomloc/1526/1526.pdf>).

### Specific Comments

Page viii. Some of the measures listed under “Managing the Network” are unlikely to have any or few positive effects on traffic, e.g. the A2 interchange, the Sturry Relief road and the A2 slip road onto Wincheap. Each of these schemes have been modelled to show increases in traffic problems (see paragraph 4.3.3 of Appendix 1)

Para 1.11. We welcome the significant increase in bus travel that has been achieved.

Para 1.14. We would suggest that the numbers of vehicles passing through the cordons around the city has not risen during the past decade mainly because traffic levels are already achieving saturation level for much of the time. This has to be coupled with recessionary affects. These facts need to be added to this paragraph.

Para 1.16. The London bound slipway onto the A2 at Wincheap probably reduces traffic on the ring road between the Wincheap roundabout and Rheims Way, but it almost certainly increases traffic on Wincheap itself (this fact is based on a number of personal traffic sample counts).

Paras 1.17 and 1.18. The news of additional cycle routes is always to be welcome and we hope that additional “joined up” cycle routes will materialise in the city.

Para 1.34 and 2.12. According to official government documentation (see <http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-353510> ) Canterbury District saw a decrease in the proportion of people cycling to work between 2001 and 2011.

Para 2.13. We welcome the excellent increase in bus travel in the District between 2001 and 2011, but note a disappointing decrease in % of shared lifts (para 2.15).

Para 2.26. It is difficult to see the logic of how increasing the housing supply in the District will result in a larger net increase in job availability. An extrapolation of data provided in Nathaniel Lichfield and Partners (2012) shows that the number of additional jobs in the Canterbury District will only be about 4,250 by 2031, i.e. compared with 15,600 planned additional dwellings. This number of dwellings will need to provide over 17,000 jobs, i.e. based on the average number of workers per household.

Paras 2.26 to 2.31. The point behind these paragraphs needs to be explained. As it is shown, these other Districts have programmes for major employment and housing expansion, and there is a hint that Canterbury is being left behind. Indeed, it could be argued that it would be sensible policy for Canterbury to hold back on expansion, i.e. because there is already an existing net increase of commuters into the city each day (see para 2.36).

Paragraph 2.32. Here the words “...central areas of the UK..” are used. Presumably this means central areas in UK cities!

Paras 2.32 to 2.35. This section on Air Pollution is “rather limited”. For instance, paragraphs 2.32 to 2.34 could apply to anywhere in the UK, but since many other cities do not have AQMA’s then how are they coping with diesel engines and health problems? In this Air Pollution section nothing is said on the much greater challenge arising from the fact that by 2016 the EU will be issuing fines to local authorities that still have the need for AQMA’s, and this will almost certainly apply to Canterbury.

Para 2.39. It would be useful to have more up-to-date data on traffic flows, but based on information provided in Appendix 1, these data have not been collected.

Para 2.45. The growth in international HGV traffic must certainly be a major worry in the sense of the damage that is done to road surfaces and the costs of ameliorating this.

Para 3.2. There is a need to explain how the Local Enterprise Partnerships can be accountable to local people, i.e. when they have no say in their composition, and in their decisions, and their actions do not need to be considered or agreed by Local Authorities.

Para 3.3. How will "...local authorities (be) accountable to their residents through local targets and performance monitoring."? This needs to be explained.

Para 3.5. It is difficult to see why there should be 5 bullets all aimed at business and the economy while only the last three partially address social and environmental issues.

Para 3.22. This District Transportation Strategy will have to recognise the recent demise of Manston Airport. This must call into question the development of the Thanet Parkway Station at Cliffsend (see also para 5.106).

Para 3.26. This paragraph will need to add at least the A28 to A257 link road through Howe barracks, the Herne and the Wincheap relief roads and the new A2 Bridge interchange.

Paras 3.31 to 3.33. We welcome the high priority given here to promoting genuinely sustainable forms of transport.

Paras 4.2 to 4.6. We are in agreement with the most of the core strategy, i.e. its key aims and its priorities. We are glad however that there is recognition "that a more focussed and robust delivery plan is required to ensure that the identified actions reduce or remove existing problems and cope with future challenges in particular the impact of new development." We particularly wish to see more development scenarios modelled (for transport) because at present the City Council has no secure data on which to optimise its development locations.

Table 4.1 – The Strands of the strategy. An extremely important strand is missing from this Table and that is to "optimise development locations". Without giving this very strong recognition there is little hope that the overall strategy will be successful. In fact this Strategy's para 4.25 recognises that "Land-use decisions taken in the past are having a profound effect on travel patterns today...". In this Table we do not understand the real usefulness of "achieving reliable journey times". Thus "reliable" best means "consistent" which in turn could apply to good or to bad. Surely the more important aim is really to "achieve reduced average journey times".

Para 4.10. We welcome the recognition that building more roads is not a long term answer to traffic congestion relief. However, the draft Local Plan includes the building of several additional roads, and we can see that some of these are hardly likely to contribute to the easing of traffic congestion. In particular, we believe that the A28 relief road through the present Wincheap Industrial estate will simply transfer traffic here from the existing main Wincheap road, and the Sturry relief road will massively increase traffic congestion along the A28 Sturry Road out of Canterbury, mainly because of the considerable housing additions being planned towards the NE areas of the District, i.e. beyond Canterbury city.

Para 4.13. This fact is 13 years old and is likely to have changed. Lynn Sloman's "Blueprint" collected factual information covering this topic and this Report deserves mention in this section of the DTS.

Paras 4.8 to 4.17. We are in almost total agreement with these Key Aims. However (para 4.16) we, and the Amey/KCC Report (see Appendix 1 of the DTS), realise that the A2 slip roads at Wincheap will serve to increase traffic levels in that area, and the Sturry relief road could have severe repercussions for the St Stephen's/Kingsmead areas of the city.

Para 4.20. We consider that the level of house building as shown in Table 4.2 (which will need amending) will result in a far larger growth of people of working age than will be accommodated by

local job creation. This will lead to the need for considerable out of District commuting. (See our comments on para 2.26).

Para 4.23. It is not true that “the allocation of land for new development will continue to make the best use of previously developed land...”. Thus the largest brownfield site in the District (at Hersden) is not being utilised.

Para 4.24. There has also been a “considerable focus for development” at both Sturry/Broad Oak and Herne.

Para 4.41. In the 2006 Canterbury District Local Plan the inspector (Charles Hoyle) said that if that portion of this land lying to the north of the New Dover Road was, “for whatever reason”, not used for business purposes then it should revert to agricultural use. This recommendation is not being observed.

Para 4.41. Lynn Sloman, in her Sustainable Transport Blueprint, showed that development sites that are located close to main road junctions are more likely to attract more car use. This places a greater burden on efforts to attract transport sustainability.

Paras 4.54 to 4.67. These paragraphs give the impression that several different development scenarios were modelled. This is grossly misleading. As well as a base situation (using 2008 transport data), what was modelled was (paragraph 4.62), a Do Minimum model which assumed that the Council would only deliver the developments that were presently “in the pipeline”, and a Do Something model, which assumed that the main developments in the draft Local Plan would be delivered. So, these were only two “time-based” models, and since the Do Minimum model was only for comparison purposes, we have no information about different spatial scenarios for developments. Yet para 4.30 of this DTS notes “The key transport objectives of sustainable development are to place development in the right location to reduce the need to travel and to ensure sustainable transport alternatives to private cars are available.” So the VISUM modelling carried out provides no information as to optimum locations for development. Since this is the primary purpose of VISUM modelling for planning scenario purposes, additional spatially-based modelling needs to be carried out before the Local Plan can be found to be sound. These paragraphs will need to be amended. **For your general information I have appended to the end of this document the submission that we have made today to the City Council regarding the Local Plan, i.e. that detailed section covering VISUM modelling – it is shown as Appendix 2.**

Para 4.57. It is noted that “The multi-modal model allows for travellers to switch between car, bus, rail and park and ride options in response to travel costs and congestion. This provides a better representation of actual travel behaviour than a purely highway based model.” Although this can be theoretically accomplished, the modeller has no idea of changes in travel costs or congestion over the period 2014 to 2031, and there is no evidence (in Appendix 1 to this Strategy) that these factors were considered.

Para 4.61. Here it notes that “It is therefore realistic to assume that further sustainable modal shift and mitigation could be achieved over and above the modelled outputs.” Given that it is very difficult to get people to abandon their use of cars, it could also be realistic to assume that sustainable modal shifts might not be achieved. This paragraph forgets to mention that there is an assumption that the 2008 data on which the modelling was done is correct and up-to-date. This would clearly not be the case.

Para 4.67. This paragraph omits to say that most journey times in and out of the city would be considerably increased in many cases, and that many roads would carry very considerable increases in traffic, i.e. especially those areas where major development is planned.

Para 5.4. The first sentence here is difficult to follow.

Para 5.10. It is difficult to think that the Horses and Goats tunnel links the city centre with the Chartham to Canterbury riverside path. It links the city centre with the Wincheap trading estate.

Paras 5.38 to 5.40. There is no mention of the numbers of pedestrians who walk in the roads that are not part of pedestrianised Canterbury. This is really quite a problem to cyclists – and I am sure that there are more of these pedestrians than there are cyclists who cycle on footpaths.

Para 5.57. Increasing cycling rates from 2.7% to 4% for the whole District over the next 17 years does not seem like a difficult challenge. We think that rates ought to at least double during this period.

Policy 5.4. How is a policy under the heading of “Rail” going to “...improve public transport coverage...”?

Paras 6.12 and 6.13. We fully endorse the gradual reduction in city centre car parking space, i.e. believing that this land should be used for more valuable purposes and that this should encourage sustainable transport aims.

Para 6.25. There is no discussion on the extent to which revitalised retail developments in Wincheap might wish to make their own parking provisions. This needs to be considered in terms of an expanded Wincheap Park & Ride.

Para 6.28. Rather than even contemplate the revival of a Faulkners Lane Park & Ride facility at Harbledown, if the need arises the City Council should investigate the provision of a Park & Ride facility near Brenley Corner. It will be noted that already there are dozens of cars parked there each day. This site could work as a two way Park & Ride, i.e. intercepting cars moving towards Canterbury and those moving towards Faversham, plus of course travellers who are already parking there presumably to share lifts. This location would be additionally favourable as relatively few additional cars would be joining the A2 between Brenley Corner and Canterbury.

Para 6.29. If ever the need arises for Park & Ride facilities between either Whitstable and Canterbury or Sandwich and Canterbury, then these P & R's should also best be sited approximately one third of the way between Canterbury and either of these places, i.e. with a view to capturing traffic moving in either direction.

Paras 6.35 to 6.38. We welcome the attempt to use car parking charges as something of a deterrent to car use, while also making sure that bus travel might be seen as an attractive alternative.

Para 6.42. On the basis of the figures shown in Table 6.4 it must be questionable as to whether the Tankerton Road car parking facilities would not better be used for other purposes.

Policy 7.1. This Policy seems extremely weak (see our additional comments under “Table 1” above). Thus, since 33 of the 36 journey times that were modelled for the DTS (and are shown in Appendix 1

– Table 6-C) will be slower under the proposed development scenario in the draft Local Plan than they would have been in the Base period, then this does not appear to be “Improving Traffic Flow”.

Para 7.12. Here it is reported that “The VISUM transport model has been used to assess the impact of an eastern by-pass which could link the A28 near the Sturry Road Park and Ride, with the A2 at a new interchange near Bridge.” We have not been able to find any mention of this VISUM modelling in Appendix 1 (which is supposed to cover this topic). This must be rectified if reasonable comments are to be made. Additionally, it has been noticed that in the mapping to accompany the Local Plan, a route for the Eastern by-pass from the A28 to the Canterbury/Dover railway line was shown as being “safe-guarded”, but requisite land from this railway line to the site of the proposed A2 interchange had not been safe-guarded. This appears to be an anomaly. As a matter of principle it seems unreasonable if supporting documentation to the Transport Strategy is selective in what it reports.

Para 7.23. It is difficult to envisage how any mini-gyratory system (unknown location) would remove west bound queuing (presumably on Rheims Way). The logic of this needs explaining. However, it is not difficult to imagine that with a revitalised retail offer on the Wincheap estate, this would be the catalyst for some considerable increase in private vehicle movements. To what extent has this been accounted for in the VISUM modelling?

Para 7.25. Where is this referring to?

Paras 7.26 to 7.32. We fully support measures to improve the Westgate Towers area and regret that the previous scheme was abandoned before proper trials and affects could be assessed. However, we note that a revised KCC led scheme has now been proposed. This should be mentioned.

Paras 7.39 and 7.40. These paragraphs would be greatly improved if an indication was given as to where they might be referring to. As they are they seem very “vague” or “stranded”.

Paras 7.41 to 7.43. Here the essential nature of the remaining slip road to allow southbound traffic on the A2 to exit at Wincheap is discussed. The “advantages” of this slip road are described, but it is contended that the provision of this slip road would only serve to increase the amount of traffic on Wincheap. This fact is borne out by the Amey/KCC modelling which notes “The addition of the southbound A2 off slip and large scale retail development, in the Do Something scenario, will significantly increase forecast traffic flows in the Wincheap area.” (Para 4.3.3 of Appendix 1).

Paras 7.49 to 7.52. We support the opening up of the existing Military Road to Littlebourne Road (A257) traffic link as a means of alleviating congestion and air pollution in the Broad Street area.

Paras 7.53 to 7.55. What is not mentioned here is that the Sturry relief road would also incorporate “relief” of the delays caused at the Broad Oak road level crossing, i.e. through closure of this crossing. However, this part of the Sturry relief road system is likely to have very strong negative effects on traffic in Broad Oak Road together with enhanced traffic congestion in the Kingsmead area.

Paras 7.53 to 7.58. We consider that developers building in the Herne Bay to Sturry corridor plus in Hersden are likely to have a huge financial burden if they are required to contribute to both the Herne Relief road and the Sturry relief road, plus changes to the station at Sturry.

Policy 8.2. We welcome the requirement for Travel Plans for all larger employers and/or developments. We also welcome the encouragement of car sharing and car clubs.

Paras 8.29 and 8.30. It is well known that the delivery of children to school by car is responsible for a considerable amount of rush hour traffic. Neither of these paragraphs recognise this fact and indeed it is not clear whether the paragraphs are discussing travel to school by teachers and children or travel to school by parents who are delivering children. It is very important to clarify all of this.

Paras 8.36 to 8.44. We strongly approve of the initiatives towards home-based working and improved broadband coverage, although we are concerned at the slow delivery of improved broadband access to parts of rural Kent.

Paras 8.45 to 8.48. We consider that a form of congestion charging already exists in the application of work place car charging. This should be more widely utilised, and it should be seen as a definite congestion charge, i.e. as well as a parking charge. A similar plan needs to be introduced at HGV destination points.

Chapter 9. We are really encouraged by the plethora of schemes that are able to supply access to those citizens who face challenging circumstances. We do hope that budgetary cuts do not force too many of these schemes to be cut or even curtailed.

Paras 9.18 to 9.24. In a similar light to the above we hope that the concessionary travel schemes (as described in these paragraphs) are allowed to continue. They are an essential element in maintaining access for many people, i.e. becoming a worthy supplement to pensions.

Paras 10.2 and 10.3. It is to be welcomed that the City Council gives strong recognition to the problems caused by air pollution. However, we wonder whether, with all the recent publicity on this problem, there are not more recent and updated facts on this. In fact, the figures quoted in Para 10.3 can be updated to 2010 from:-  
[http://www.hpa.org.uk/webc/HPAwebFile/HPAweb\\_C/1317141074607](http://www.hpa.org.uk/webc/HPAwebFile/HPAweb_C/1317141074607)

Policy 10.1. This policy says that “where possible (the Council) reverse the adverse effect of transport and its infrastructure, on the natural and built environment and on local communities,” The Council are aware that they have a legal obligation to reduce air pollution in order to meet EU legal limits, so the “where possible” needs to be deleted.

Paras 10.11 to 10.13. We feel that the City Council should be more open about resolving the problems associated with traffic induced air pollution. Thus, after the original AQMA was declared in 2006, the Council stated that this problem would be resolved before 2010. It was not. But indeed, throughout the UK, Councils have been unable to reverse any of the declared AQMAs. This intractable problem has built up because there are simply too many vehicles on roads where pollutants are likely to be concentrated, and improvements in vehicle emission standards have not kept up with vehicle numbers. Therefore, in this DTS document it could be stated that any solutions to the vehicular air pollution problem lies mainly in the national government’s, or the EU’s, remit.

Para 10.15. The “Air Quality and Planning Technical Guidance” (produced by “The Kent and Medway Air Quality Partnership) states that “Development that has the potential to result in a deterioration of air quality will only be acceptable if appropriate mitigation measures can be implemented to ensure that, no deterioration in air quality occurs as a result of the proposal.” (Para 2.2). Having regard to the areas of Canterbury already included in the AQMA, and to the location of proposed developments in the Local Plan including the provision of new main roads, it is clear that some developments will have a negative impact on the AQMA. For instance, excessive house development

in Canterbury will mean that there is likely to be increased commuting from both of Canterbury's rail stations. Road journeys to these rail stations will inevitably increase. There will also be a considerable time over which excessive traffic will be delivered into Wincheap from developments in South Canterbury. (see Amey/KCC VISUM modelling report).

Para 10.26. We support the so-called "consolidation centre" for the transfer of goods from HGV's to areas in and around the city. Presumably deliveries from this centre could aim to avoid where possible use of the AQMA, of predominantly residential roads, plus pedestrianised areas out of permitted times.

Para 10.34. Presumably the figures given in this paragraph refer to national levels of traffic rather than local levels.

Para 10.35. Surely a Policy to encourage the local sourcing of all foods and materials would be an appropriate addition here?

Para 11.2. It seems rather surprising that "those locations where there is a pattern of crashes that might be improved by an engineering measure" have not already had crash remedial measures applied!

Paras 11.3 to 11.9. We support the introduction of 20 mph speed restrictions on all urban residential roads, and indeed it appears that the City Council supports this. However, from the wording of these paragraphs it is not clear whether these restrictions could be applied by the Council in all such areas. Whilst we recognise that enforcement by the police might be difficult, the same could be said about the enforcement of any speed limits. Thus there are existing 20, 30, 40, 50, 60 and 70mph areas – so why not 20mph in residential urban areas?

Para 11.18. We welcome the fact that speed management measures have been highly successful in reducing accidents and fatalities on the City's roads.

Paras 11.22 to 11.25. We further welcome the measures being taken to secure better conditions for cyclists on the District's roads. We believe that the greatest future improvements could be attained by the programme to join up the cycle routes, especially in Canterbury city, so as to deliver continuous cross-city safe routes.

Para 12.1. We believe that the road link shown on the accompanying map, which links the proposed Sturry Link road to Broad Oak Road, should be aligned differently from that shown here, though in fact there is some doubt as to whether or not this planned road is now to proceed.

Section 12.2. The title of this section is "Encouraging sustainable travel". This appears to be a rather inappropriate use of the word "sustainable". Thus many of the measures have little to do with sustainability, i.e. the measures could best be described as "improvements". This is important to mention since nationally it has been recognised by a government committee that, with respect to planning guidance and the NPPF, the word "sustainable" should have been better respected (see <http://www.publications.parliament.uk/pa/cm201012/cmselect/cmcomloc/1526/1526.pdf>).

Where possible, it would have been useful if the first column in these tables (headed Ref) had been referenced to paragraphs or policies within the main document.



Table 12.2 should have been prefaced with more explanation. For instance, on page 82 there are a number of public realm improvements for walkers. Very large sums of money are mentioned but there is little guidance as to how this money is proposed to be spent. In other words, as the Tables stand, much of their content could be little better than a 15 year wish-list.

Table 12.2 needs to distinguish more clearly between “investigations” and “actions”. For instance, in A9 it says “Investigate and implement...” yet there is no cost attached to the measure; in B29 it says “Cycling training and education for children and adults” yet this has no cost attached; D4 contains just a feasibility study to “consider track lowering at St Dunstan’s: in D7 it says “We will investigate with Network Rail options...” yet this investigation has a one million pound price tag; in D11 it says “We will continue to lobby for....” and this costs one million pounds. And surely (in F2) the modelling of traffic signalling roundabouts would not cost £1 million pounds! There is thus a lack of consistency between whether items are actual estimated expenditure or whether they are simply investigating items that might incur expenditure.

Table 12.2 (A9) We would like the Council to address measures to encourage pedestrians to keep to the pavements in non-pedestrianised areas.

Table 12.2. (Section B). We welcome the 27 new or upgraded cycle routes that are described in this section.

Table 12.2 (E3 and E4). It is difficult to see why the net expenditure on providing extra car parking spaces at the New Dover Road P & R would equate to £16,666 per space v. £7,000 per space at the Sturry Road site. At both sites the land would need to be bought and the spaces built. Presumably surplus land at the former Dover Road site would have been sold. This needs explaining.

Table 12.2 (G5). This section does not discriminate between (i) teachers, staff and pupils AND (ii) parents delivering and collecting children to/from school.

Table 12.2. In total this Table includes just on £100,000,000 of transport spending plus many items that are not costed but which must involve an expense. Nearly all of this is to be paid for from S.106 agreements, from CIL’s or from Lottery funding plus CCC resources. We consider that the costs incurred for additional bus measures (in section C.1 to C.9) could be very considerable. On top of this, money must be found for a great number of other infrastructure items in the Local Plan. We consider that the Council might be advised to indicate the total likely expenditure on transport over the period to 2031.

Chapter 13. Several factors cause this chapter to be very difficult to interpret:

- There are many different funding streams each of which may have a multiplicity of terms and conditions.
- There are items included that do not appear to have anything to do with transport per se, e.g. the Kent Big Society Fund, or which are only connected with transport very indirectly, e.g. the New Homes Bonus.
- The chapter mixes up capital spending with revenue spending.
- There is a huge variability of monies between the various “pots”.
- Monies may be given at national, regional or local levels.
- Etc.

It would be really helpful if the Council could provide some indication of the capital expenditure (and perhaps revenue expenditure) that might be available for spending during each year of the Local

Plan. This might allow the reader to estimate (from Chapter 12) what range of funding items could be potentially purchased.

An additional point here is that if (as para 13.5 indicates) £8.15 million spending is proposed over a 6 year period (2015 to 2020), that indicates an annual spend of about £1.3 million. But the figures in Table 12.2 indicate that at least £97,000,000 will need to be spent over the Local Plan period, i.e. a rate which equates to about £5.7 million p.a. This considerable spending difference needs some explanation.

The Canterbury Society respectfully finds that little of this section 13 on transport delivery is “convincing” and we doubt that any “spending institution” (public or private) would be advised to proceed with their plans on the basis of the information provided here.

Para 14.3 and CDTS Target 1. If journey times of buses compared with journey times for cars are to be measured, then why does this paragraph only say that journey times for buses will be monitored?

Para 14.4. An explanation is needed of the term “journey time threshold”. As things stand (in CDTS 2) it is difficult to understand how peak hour journey times can be below those of the monthly journey time figure.

Paras 14.5 to 14.7. While we applaud the targets set in CDTS 3, we wonder whether they are at all realistic. Thus, with car ownership generally set to grow, together with 25% more people living in Canterbury, this ambition looks extremely challenging. It must be remembered that if this CDTS is to achieve credibility, then a high degree of realism is essential.

Para 14.6. This says “A target of the strategy is: “to maintain the same level of peak hour vehicle journeys in 2031 as measured in the base year”. Since traffic in the base year will have already suffered from congestion, this does not seem to be sensible strategy.

Paras 14.8 to 14.4. Again we applaud the targets outlined in these paragraphs and in CDTS4 and Table 14.1. We suspect that some of the targets are well within a realistic estimation, though the reduction again in car use may prove to be challenging. We think that the emphasis on achieving these targets should be placed on increased bicycle use. Thus, not only in Oxford and Cambridge but also in many European cities, we have seen that bicycles can be readily accepted as a more than reasonable way to travel. Indeed, we note that in Cambridge use of a bicycle has almost caught up with car use.

## **APPENDIX 2. Summary of Comments on the VISUM Traffic Modelling as Presented in the Preferred Draft of the Canterbury District Local Plan (2014)**

In their Introduction to the Local Plan (paragraphs vii and viii) the City Council recognise that “One of the main issues facing the District is traffic congestion and the delivery of new key infrastructure to help relieve this.” The Canterbury Society, and probably most residents of Canterbury District, heartedly concur with this statement and recognise that the Local Plan must address this issue as a major priority.

The Plan is essentially a spatially-based plan that seeks to optimise the spatial disposition of major developments in the District over the planning period (2014 to 2031)<sup>1</sup>, and the efficiency of the transport network is arguably the most important factor contributing to the optimum distribution of important functions in the District. The Society’s basic concern, and main reason why it finds the draft Local Plan to be unsound, is the lack of adequate and appropriate transport and traffic analyses to test this efficiency.

Nowadays the optimising process for ascertaining strategic and other development locations requires the use of transport modelling. This modelling is important because it is able to provide comparative information on the relative efficiency of different locations in terms of time, distance and cost, with the results from the modelling forming the basis for objective-based decision making. As part of the District Transport Strategy (DTS), the City Council together with Kent County Council (KCC), undertook transport modelling via the use of modelling and analysis software known as VISUM<sup>2</sup>.

It is the manner in which this modelling has been carried out which gives rise to our concern, and to clarify this assertion it is necessary to elaborate on the procedures that have been followed<sup>3</sup>. It is especially important to note in this submission many of the facts surrounding the first (Jacob’s) attempt at VISUM modelling of the Canterbury District. This is because Jacob’s has been oft quoted in the second (Amey) VISUM modelling and because it appears that the raw data was passed from the Jacob’s version to the Amey version, and finally because the Jacob’s report can readily be discredited (see Annex A).

In December 2012 Jacob’s UK Ltd published a “Canterbury VISUM Model - Draft Option Testing Report”. This was produced as a means of testing transport efficiency alternatives for the Canterbury District, with added testing emphasis on Canterbury city, with respect to supporting spatial development proposals in the then emerging Local Plan. Basically three different spatial development scenarios were tested:

**Option 1** – residential development primarily in and around Canterbury city and the Herne Bay area with a higher allocation of commercial development focussed in the same areas;

**Option 2** – the lowest allocation of residential units primarily located in coastal areas and along the A28 corridor at Sturry and Hersden. Commercial development is also focused in similar areas.

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<sup>1</sup> The spatial disposition for major developments must also consider factors such as land availability for development, the quantity and types of proposed developments, infrastructure requirements, future transport requirements, the nature of existing developments, areas of conservation value, landscape impacts, ecological habitats, and the agricultural land quality.

<sup>2</sup> The importance of this VISUM modelling is shown by the fact that it forms the major Annex 1 to the District Transport Strategy.

<sup>3</sup> It is not possible to comment here on the actual VISUM processing of the data that might have been followed, therefore it must be accepted as being correct.

**Option 3** – significant residential development distributed across the district. A lower level of commercial development is distributed in the Herne Bay, Sturry and Hersden areas.

It is important to describe these options because Option 1 represented almost exactly the disposition of major developments as was then in the emerging Local Plan, i.e. this was a “Preferred Option”, and indeed an important feature of using VISUM for optimising transport efficiency is that one Option being modelled should replicate the development scenario that is being planned for.

The Jacob’s Report (page 31) came to the conclusion that Option 1 was indeed preferable with respect to transport efficiency. However, we found this conclusion to be highly questionable. Our suspicions were based on the data published in the various quantitative tables appearing in the Report, and on the extremely biased way in which the conclusions were reached<sup>4</sup>. Thus, we did not believe that the Jacob’s data presented showed Option 1 to be preferable. In order to illustrate this, the table below shows an analysis of all the mixed data available in the Jacob’s Report<sup>5</sup>, i.e. whereby a ranking was given to the variable being measured such that a score of 3 was given if that variable was best in terms of the traffic outputs being measured (B); a score of 2 was given if it was middle (M), and a score of 1 was given if it was worst(W). Obviously the Table does not produce a truly scientific result but it casts strong doubt on the Jacob’s Report conclusions. It shows in fact there is little to choose between the three Options being modelled, although Option 3 scores most highly, and Jacob’s preferred Option 1, is actually the least preferred. Clearly there is need to revisit the VISUM modelling using more up to date data and an updated transport route scenario based more exactly on Local Plan intentions.

Model measurement being made	Option								
	1			2			3		
Increase in travel demand (am) (Table 4-a) <sup>1</sup>	50100	W	1	49900	M	2	49900	M	2
Increase in travel demand (pm) (Table 4-a) <sup>1</sup>	49700	W	1	49400	B	3	49500	M	2
Mode of transport (car) (Table 5-a) <sup>2</sup>	84.2%	W	1	83.0%	B	3	83.8%	M	2
Mode of transport (bus)(Table 5-a) <sup>2</sup>	11.0%	W	1	12.7%	B	3	11.7%	M	2
Mode of transport (rail)(Table 5-a) <sup>2</sup>	4.8%	B	3	4.3%	W	1	4.5%	M	2
Park & Ride use (am)(Table 5-b) <sup>3</sup>	4.1%	B	3	4.0%	M	2	4.0%	M	2
Park & Ride use (pm)(Table 5-b) <sup>3</sup>	2.4%	M	2	2.4%	M	2	2.6%	B	3
Peak road traffic speed reached (mph)(Table 6-a) <sup>4</sup>	19.7	B	3	19.5	M	2	19.5	M	2
Additional vehicle kilometres driven (Table 6-a) <sup>4</sup>	200551	W	1	184704	B	3	186600	M	2

<sup>4</sup> For instance, in Jacob’s Summary of Options (p.30 of the Jacobs Report) they detailed the “unique set of characteristics” pertaining to each of the three Options that they modelled. Their conclusions on each Option can be summarised as follows:

- For Option 1 Jacobs lists 2 neutral and 4 positive points.
- For Option 2 Jacobs lists 2 neutral and 4 negative points.
- For Option 3 Jacobs lists 1 neutral and 5 negative points.

From this summary it can clearly be seen that Jacobs recommended that Option 1 performs best in terms of transport modelling, so they recommended that this model would be best in terms of major Canterbury development locations and their impacts on transport. But, as shown by the Table in the text, this is completely at odds with an objective reading of the Report which would indicate that Option 1 has as many negative points as the other two options.

<sup>5</sup> A freedom of Information request was put into Kent County Council to obtain the original input and output data used by Jacobs for their modelling, but this was refused on the grounds that there would be too much data (in too many files) for them to supply.

Total congestion time created (mins) (Table 6-a) <sup>4</sup>	313951	W	1	30644 4	M	2	30237 4	B	3
Inner cordon crossed (am)(Table 6-b) <sup>5</sup>	16900	B	3	17000	M	2	17200	W	1
Inner cordon crossed (pm)(Table 6-b) <sup>5</sup>	16300	M	2	16400	W	1	16200	B	3
Mean time delay at junctions (Figures 6-e, f and g) <sup>6</sup>	1.87	B	3	2.07	W	1	1.96	M	2
Total score			25			27			28

<sup>1</sup> Person trips. Not all the travel demand tabular data were used because other Tables produced relied on these same data.

<sup>2</sup> Person trips. Assumes that increased use of car is undesirable, but increases in bus or train are preferred.

<sup>3</sup> Person trips. Assumes that the largest proportion of traffic diverted to Park & Ride is good.

<sup>4</sup> Assumes that faster speeds, shorter extra driving distance and less congestion time are preferred.

<sup>5</sup> Assumes that least amount of traffic moving through inner traffic cordon is preferable. Data on outer cordon crossed has not been included because this could have both negative and positive effects.

<sup>6</sup> Minutes. Data based on a calculation of the mean delays at all road junctions shown on each map.

Thus, basically we had to conclude that Jacob's were being less than honest in their conclusion and in fact they seemed to be giving the customer (Canterbury City Council) the answer they wanted. Annex A to this submission catalogues some of the doubtful material that is contained in the Jacob's Report. Not long after this Report was issued we learned that KCC had terminated their VISUM modelling contract with Jacob's and that they were in the process of appointing a new transport modeller (Amey).

The problem for the Local Plan was that this new VISUM modeller was not appointed until late 2013 – a date that was after the time when the draft Local Plan had gone out for consultation. Effectively this meant that not only was the DTS significantly delayed but that there was no reliable transport data to inform the draft Local Plan; thus the existing Transport Plan for Canterbury (Unblocking the Gridlock) had been published in 2004, and was thus completely outdated. This meant that KCC and Amey were obliged to hurriedly re-do some VISUM modelling and a report was published ("Canterbury VISUM Transport Model" - Amey and KCC – 17/02/2014). But in their haste, the City Council seemed to ignore the fact that the Local Plan is a spatial plan. The report that Amey subsequently produced simply modelled transport efficiency (for some of the District) in terms of:

- what the results would be using just the 2008 base data that had been used to populate the earlier (Jacob's) VISUM modelling;
- a so-called "Do Minimum" scenario which added some recent developments to the 2008 base data and included development proposals that were currently "in the pipeline"<sup>6</sup>, and
- a so-called "Do Something" scenario which additionally added all the major development proposals to 2031 that were incorporated into the then draft Local Plan.

It is clear from the above that this is temporal modelling and not spatial modelling, and thus the output from the only model which is of current spatial significance (the "Do Something" model) has nothing to be compared with. (Annex B outlines a large number of other concerns that we have in respect to this modelling). So, people in Canterbury District (and the City Council themselves) have little idea of what would be an optimum development scenario in terms of road traffic (or any other form of transport) if the disposition of developments were to be configured differently from the "Do

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<sup>6</sup> This "Do Minimum" scenario would have included sites which already had known locations and thus these should have informed both the "Do Minimum" and the "Do Something" modelled scenario.

Something” (preferred) option<sup>7, 8</sup>. This is of crucial importance to a District that has every symptom of being heavily congested, with areas of chronic air pollution, and where current planning is for over 5,000 new dwellings (plus additional retail and employment provision) being concentrated in one Canterbury quadrant, and where the bulk of the rest of the proposed housing is located in only two clusters, one between Sturry/BroadOak and Hersden and the other to the south of Herne Bay.

The Canterbury District Plan (paragraph 4.68) notes that even under Amey’s “Do Minimum” model “there will be a continual increase in the demand to travel”, but Amey’s “Do Something” model showed that in almost every way modelled the traffic situation around the city of Canterbury will be much worse in 2031 than it is at present, with travel time increasing along most parts of the road network, in some places by more than 33%<sup>9</sup>. Although some limited transport modelling looked specifically at the Canterbury city development proposals, none of the modelling analysed the repercussions that an additional 3,000 houses built in the area to the south and east of Herne Bay will have on this and surrounding areas. This is a very important omission. And around the city of Canterbury the Local Plan has now allocated a further >1,000 net houses since the Amey work was undertaken, meaning that the traffic situation for the city can only be worse than the modelled results show, perhaps by as much as 20%. Also, considerably more employment land is to be utilised at Hillborough and Altira Park in the Herne Bay area. Altogether seven of the housing allocations are the same in both the Preferred Draft Local Plan (2014) and the Amey VISUM modelling study, while there are ten housing allocations that are different.

We feel extremely confident that, were a range of developments more carefully distributed throughout the District, then the total traffic impacts would be more equable, and that severe traffic congestion for many locations would be minimised. It is clear from an analysis of the current SHLAA list that an alternative array of development sites are available<sup>10</sup>, and it is likely that a development scenario could be found that conformed more to sensible planning policies rather than the macro-scale policies promoted largely by the South East Local Economic Partnership (see page 9 of: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/327615/30\\_South\\_East\\_Growth\\_Deal.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/327615/30_South_East_Growth_Deal.pdf)). Importantly, it must be remembered that the flawed Jacob’s model inferred that the then (2012) “Preferred Option” scenario, which in most ways replicates the current “Preferred Option”, was in fact the least preferred development scenario. This signals to us that more and better quality traffic modelling urgently needs to be employed. Finally here, we wish to take issue with the statement appearing in the Canterbury District Local Plan – Consultation Statement – June 2014, which says “In transport terms, the provisions of the draft Plan have been the subject of extensive strategic modelling of development options and the preferred option.” (page 29). This is simply not true.

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<sup>7</sup> Recall from the Table above that the Jacob’s Report had indicated that perhaps Option 3 (with a more dispersed development scenario) would be the most suitable configuration for development.

<sup>8</sup> We have investigated the VISUM type modelling performed by other local authorities and in all instances a number of spatially different development scenarios were tested (in the range of three to nine). See, for instance, the transport modelling carried out in Stamford, the Vale of White Horse, Crawley and Basingstoke.

<sup>9</sup> A report from Council officers to the Executive committee (dated 10 April 2014) stated “Advice from the Highway Authority, Kent County Council (KCC), and the Council’s own transport planners (following the VISUM transport modelling) is that the transport network in Canterbury cannot sustain a number of new large housing sites at the City, in conjunction with the allocation of Wincheap to meet future identified retail requirements. This is because of congestion on the ring road; the difficulty of achieving fast bus links to the City Centre and limited options in relation to alternative transport routes;”

<sup>10</sup> Thus, under Scenario E (identified in the “Development Requirements study” – page 62) approximately 90 hectares of land would be needed in the next five years in order to meet the housing needs of the District. The appraisal of the SHLAA sites identified 35ha of land that performs very well against the SA objectives and a further 83.59has of sites that have more positive than negative effects.

It is for all the reasons stated in this Appendix, including the Annexes A and B below, that we find this section on VISUM to be unsound, and since this traffic modelling lies at the root of successful development allocations, we find the Local Plan itself to be unsound.

It is relevant to note that the National Policy Planning Framework clearly states (in italics with points significant to this submission in bold):

- Paragraph 34. *Plans and decisions should ensure developments that generate significant movement are **located where the need to travel will be minimised** and the **use of sustainable transport modes can be maximised**.* It is impossible to work out those locations where "travel will be minimised" or "transport modes can be maximised" unless several (or indeed many) development scenarios have been modelled.
- Paragraph 152. *Significant adverse impacts on any of these dimensions (social, environmental and economic) should be avoided and, wherever possible, **alternative options which reduce or eliminate such impacts should be pursued**.* In terms of transport efficiency no alternative development options have been examined.
- Paragraph 154. *They (Local Plans) should address the **spatial implications** of economic, social and environmental change.* The spatial implications of this development scenario have only been addressed with respect to actual terms rather than relative terms, yet in planning or spatial optimisation exercises it is the relative implications that are important.
- Paragraph 158. *Each local planning authority should ensure that the Local Plan **is based on adequate, up-to-date and relevant evidence** about the economic, social and environmental characteristics and prospects of the area.* In transport terms this Plan is not based on up-to-date data, nor is there adequate evidence on which reasonable decisions can be made.
- Paragraph 182. *The plan should be the most appropriate strategy, **when considered against the reasonable alternatives**, based on proportionate evidence.* With respect to transport and transport efficiency and the locations of proposed developments, the draft Local Plan has not considered reasonable alternatives.

It is also noted that in this Local Plan (at paragraph 5.11) it is stated that an action of the District Corporate Plan is "Ensuring new building development occurs in the right places to support broader travel options and promoting alternatives to reduce traffic across the district". It is also clear to us that the section headed "VISUM strategic transport modelling" on page 61 of the Canterbury District Local Plan – Consultation Statement dated June, 2014 has not been compiled by someone who is familiar with VISUM capabilities. Thus only the two sentences beginning "The suite of sites..." is valid to this section. Additionally, on page 36 of this same document it states "The VISUM modelling shows additional traffic through Herne and the relief road will have the benefits of removing some traffic from Herne; assisting with air quality issues and improving the environment of the Conservation Area through the removal of traffic." In Amey's "Canterbury VISUM Transport Model" no evidence is presented for this statement, and indeed, as we mentioned above there is barely any traffic/transport modelling for the Canterbury District north of the Blean Woods.

It is for the reasons stated in the above paragraph that, with respect to the assessment of transport and traffic modelling, we find the Local Plan not to be legally compliant.

With respect to "Duty to Cooperate" we offer the following comments:

1. According to verbal conversations with the chair of Kent County Council's "Joint Transportation Board" (Cllr Alan Marsh) there have been no discussions between KCC and Canterbury City Council in respect to transportation measures required by this Local Plan.
2. Canterbury City Council has not kept records of all the conversations that have taken place between Ruth Goudie (KCC – Highways) and the City Council.

3. Through Jeremy Baker (representing Harbledown Parish Council) we have tried to obtain through Freedom for Information, details on the data used first by Jacob's and subsequently by Amey, i.e. that have been used to populate the VISUM modelling. In a message dated April 7th, Mr Baker was informed by KCC that "we do not intend to release this data as parts of it were gathered by our highway consultants from data protected or commercially sensitive sources, and we have given assurances that the data would not be passed on". But, given the accuracy of data required for proper modelling, and the fact the modelling data used must be at least six years old, we are not satisfied that the results of any modelling can be relied upon even for the one spatial scenario tested.
4. The fact that the original VISUM information on the modelling results as supplied by Jacob's were obviously flawed, then the cooperation between that company and the City Council must be called into question.

In order to remediate the deficiencies in respect to these traffic aspects of the Local Plan, in our view it will be necessary to:

- a. Update the data that forms the basis of the traffic/transport VISUM modelling. At present this data must be a minimum of six years old which makes it unsuitable for reliable traffic modelling.
- b. Re-do the VISUM modelling scenarios so that a minimum of five development scenarios are tested and so that the whole of the District is modelled<sup>11</sup>.
- c. Make certain that some of these scenarios contain built in impedences such as "use of Grade 1 land", "destruction of woodland", "distance from public transport", etc.
- d. Make certain that the models more accurately reflect, in terms of their exact locations and quantum, the realistic needs for major infrastructure such as schools, community centres, community shops, a relocated hospital, site of the Bridge road interchange, etc<sup>12</sup>.
- e. Address the comments and deficiencies to the latest VISUM (Amey) Report as listed in Annex B below.

## **ANNEX A.**

### **Brief comments and some main concerns with the Jacob's VISUM Modelling for Canterbury District (2012)**

1. As can be seen from the main body of these comments (see above notes), it is apparent that the basic conclusions from Jacob's modelling had been "manipulated" so that they provided the answers that the City Council wanted. This is a very serious charge but it is difficult to see any other reason for coming to the results that Jacob's did.
2. There was no discussion on what the "Do Minimum" model (appearing in the Jacobs report) is all about.

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<sup>11</sup> A simple but useful example of modelling output comes from <http://www.southkesteven.gov.uk/CHttpHandler.ashx?id=5199&p=0>. Although this study covered a smaller urban area than Canterbury, it was assessed that 9 scenarios could be suitably modelled. Excellent mapping output was also provided giving a valuable insight into the methods used and results obtained.

<sup>12</sup> We would like to recommend that modellers pay heed to the guidelines for traffic/transport modelling which is set out in ("Traffic Modelling Guidelines" (Transport for London, 2010) - see [www.tfl.gov.uk/assets/downloads/traffic-modelling-guidelines.pdf](http://www.tfl.gov.uk/assets/downloads/traffic-modelling-guidelines.pdf)). These guidelines make it clear that the degree of accuracy and detail should far exceed that which was input into the VISUM modelling for Canterbury District.



3. The modelling took no account of walking and cycling or of introducing strong traffic sustainability measures. For instance the 20% cycling level now reached in London is having a major effect on transport modelling. It is hoped that cycling rates in Canterbury will be considerably higher by 2026. And other futuristic projections cannot be predicted, e.g. how could the modelling predict how many cars will be on an estate of 4,000 houses, or the locations where the 1,000's of windfall houses will be built?
4. There was no mention of likely passenger numbers using rail stations. Since insufficient jobs are planned for in the Local Plan period then out-commuting from Canterbury is certain to increase substantially.
5. Because a focus was given on the Canterbury city area, the modelled output for the rest of the District was only given at a very crude scale. For the Herne/Herne Bay area and for the Sturry/Broad Oak area the resolution was totally insufficient for a plan that had allocated respectively 3,490 and 3,590 house units to these two areas (for Option 2).
6. Both inputs and outputs to the model were very similar for each of the three options – this made the establishing of any priority almost impossible to achieve. So, unsurprisingly, total travel demands by 2026 were very similar for each option, though worryingly they showed a significant overall increase of traffic from the 2012 situation, i.e. onto roads that are already congested during peak periods.
7. There was no information as to the basis of the modelling sectors used, or how the data was actually obtained on which the modelling was based. Canterbury District was divided into only 16 sectors and all developments appear to have been randomly spatially allocated within 221 “model zones” within sectors, some of which were very large areas. However, exactly where a development is sited within a sector or model zone can have a major impact on road saturation levels. It is essential (as Transport for London has indicated - see [www.tfl.gov.uk/assets/downloads/traffic-modelling-guidelines.pdf](http://www.tfl.gov.uk/assets/downloads/traffic-modelling-guidelines.pdf)) to collect accurate data.
8. There was little information on a host of other factors relating to the modelling methods used, e.g. sampling strategies, size of roads included, number of site visits, time of year, how saturated traffic flows were recorded, the base model parameters, weather conditions, queue lengths, turning counts, important traffic sinks or sources, etc, (see footnote 5 above). These are all really important to model outcomes. A Freedom of Information request to obtain these data was turned down.
9. Most importantly, the report says that all sites had been modelled – this was simply not true.
10. Modelling covered a 15 year time period – this is far too long a period to obtain meaningful results. Also, results indicated just three “snapshots” in an assumed 2026 situation. We are not told when the various roads, road interchanges or bus services were to commence building or would be operative. This could make a huge difference to road congestion from one time period to another.
11. Because the Jacob’s modelling work was undertaken prior to 2012, many of the then Local Plan infrastructural developments had not been included, e.g. lots of community facilities, a new Herne Bay High School, dental surgeries, other primary schools, etc. Without the inclusion of these major developments, there was no possibility that the Jacob’s results would have been reliable.
12. The development scenario assumed that virtually all retail development would only occur at Wincheap, i.e. 85% (Figure 3 – c). But there is little evidence that any additional retailing might be needed, and since the Wincheap estate already consists almost exclusively of retail, we see little potential to increase the number/size of retail outlets.
13. Other information was poorly presented e.g. proportional bars on Figs 4 – c and 4 – d highlight Herne Bay and Whitstable as being the origin of large numbers of road trips but this is only because their sectors were very large and thus have a much higher population.

14. All data was outdated (mostly pre-2008) – so clearly the modelling input data should have been recalibrated.
15. The modelling appeared to be covering public transport (bus and train) but almost no information is given on this. So it would be useful to have known the estimated numbers travelling into and out of the railway stations in the District, as well as the impact on the roads of increased station use.
16. The way in which Jacob's did the modelling required conflation of data which was of greatly varying magnitude or resolution. For instance, much of the vehicle sample counts would have been for micro scale sections of roads, whereas the 4,000 houses in South Canterbury were simply located as one "development block" in an unknown location within a modelling sector. The mixing of relatively micro-scale data with macro-scale data causes an averaging effect such that the results of the modelling may be very questionable and indistinct<sup>13</sup>.
17. There was no inclusion of the fact that, under this draft Local Plan, large numbers of Canterbury residents are likely to have to commute to London. This will incur a large rise in journeys across the city plus considerable extra railway parking, mainly at Canterbury West.
18. Little mention was made of the fact that very large aggregations of development within specific areas are certain to have adverse effects on traffic in these areas, e.g. in the SE quadrant of Canterbury or in the Herne to Herne Bay area.
19. Jacob's Option 1 resulted in both increased vehicle usage and more time lost in congested traffic than the other two options. Most importantly, the Jacob's Report (page 23) mentions that the proposed A2 slip road at Wincheap "attracts additional traffic from the A2 to the A28 Wincheap access to Canterbury and generates a significant amount of delay in the model..... and this in turn contributes to the higher level of congested travel time..." It was always clear to the Canterbury Society that the slip roads here would be detrimental to Wincheap congestion.
20. Options 2 and 3 in the Jacob Report appear to indicate (Table 3B – page 10) that if no housing or employment allocations were to be made in south Canterbury, then there would be no need for the additional A2 slip road at Wincheap, the A2 interchange at Bridge or the Ten Perch Road junction near Wincheap. In times of economic stringency then this might seem a sensible option, especially as these Options do best under the Jacob's modelling!
21. Appendix 1 of Jacob's Report (p.32) – under Development Data, showed there to be Commercial Development in the Option 1 model at Strode Farm, St Stephen's Hill/Alcroft Grange, East of Rattington Street, and Mountfield Park. But the map in Appendix B (p.35) showed the commercial development for the Option 1 to be at Strode Farm, Hillborough, Mountfield Park and possibly Thanington. To confuse matters further, in Table 4-C (p. 13) it says that in Option 1 there is 28,000m<sup>2</sup> of business land at Thanington, and finally the map (Figure 3-B) showing commercial land use shows this to be located at Thanington, South Canterbury and Herne Bay. Clearly there was a great deal of confusion here!

## **ANNEX B.**

### **Brief comments and some main concerns with the Canterbury VISUM Transport Model - Local Plan Preferred Option Testing Report - Document Reference: CO04300069/002 (Amey, 2014)**

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<sup>13</sup> This averaging effect was noted (on pages 17 to 19 of Jacob's) where it was recognised that results showing patterns of movement across the District were nearly the same for each option.

The above document also appears as Appendix 1 to the Canterbury District Transport Strategy 2014 – 2031 (Draft). Here we present detailed comments referring to specific paragraphs in Amey's VISUM Report.

Paragraph 1.1. Here it reports "The commission requires the use of the Canterbury VISUM model, as previously developed by Jacob's on behalf of KCC and CCC..." Given that the Jacob's modelling has, in a large number of ways, been "questioned or discredited" by this author (see Annex A above), and because Jacob's services were terminated by KCC, we do not believe that the Jacob's report is a reliable basis for the present report.

Paragraph 1.3. Here it states that it is recommended that the 2012 Jacob's report be referred to "as the context for this latest study". Again, for reasons mentioned above, this seems a questionable action to be taking.

Paragraph 2.2.3. It is stated in the District Transport Strategy (DTS) that the Strategy has the potential to increase walking and cycling to 30% of trips. In the second paragraph here it states that "an objective of the Canterbury Transport Strategy is to raise the mode share of walking and cycling in the Canterbury urban area for existing travel to 40%". It is difficult to understand these apparently conflicting data. The ambition of 40% of trips being walked or cycled seems very optimistic.

Paragraph 3.1. This notes "...Option 1 (of the Jacob's VISUM Transport modelling) demonstrated marginally improved performance over the other options through more beneficial transport interventions." This is an incorrect observation – see our analysis in Appendix 2 above.

Paragraph 3.1 Here it states "CCC and KCC have therefore derived a preferred development scenario, which combines key attributes of Options 1-3 to deliver beneficial transport infrastructure and encourage modal shift to park & ride, bus, rail, cycle and walking as well as deliver the economic and housing growth aspirations for the district up to 2031." CCC and KCC might have developed their preferred development scenario, but they have shown no evidence that this is the optimum development scenario.

Paragraph 3.2. In the Do Minimum scenario there is no realistic idea on how the assumptions were made. Thus it is noted that committed schemes and existing allocations and permissions would be included in the model. But the Council has no idea what these would be until 2031. And the Do Minimum scheme seems to exclude the windfall housing, which is unrealistic. What the Do Minimum scheme actually seems to mean is "build only what is in the pipeline" – and onto this the Do Something scheme means "add all the additions contained in the Local Plan". But the Do Something scenario is already superseded by at least 10 changes to the housing allocations alone.

Table 3-A. Land use assumptions. The business allocations seem to be considerably in excess of the figures given in the Jacob's VISUM modelling report. Thus for business Jacob's shows an average land use for the three options of about 115,000m<sup>2</sup>, whereas the present Amey report shows 433,500 m<sup>2</sup> (in Table 3 – A, but 173,000m<sup>2</sup> in Appendix B), and the Local Plan gives a figure of 96,775m<sup>2</sup> (in Policy SP2). Even allowing for the extended period of modelling for this report, these figures need checking.

Paragraph 3.5. It is highly unlikely that Wincheap would be the prime location for **additional** retail allocations. Thus the site is already primarily developed as such, i.e. leaving little room for additional retailing; besides which we believe that this site would be far more beneficial for office and high-tech light industrial development.

Paragraph 3.6. The average number of children per household in the UK is 0.28. Given that the latest intention is to build about 15,600 new houses in the Canterbury District, this equates to approximately 4,400 children. About half of these might be of primary age which means that about 5 new primary schools will be needed. Traffic modelling requires that their locations be determined, and building them requires the necessary funding provision guarantees from KCC.

Paragraph 4.1. Here the report notes “The model demonstrates the estimated travel demand for highway and **public transport trips** for each scenario.”, and in paragraph 5.1 on page 20 “The model calculates mode share and modal shift for car, **bus, rail** and park & ride trips...” But nowhere in the report can we find factual data showing present demand or future forecast figures for public transport use. Since this Local Plan makes a positive feature of the need to increase public transport usage, then at least baseline data upon which changing usage can be measured is needed.

Paragraph 4.2. The Do Something model, which takes account of all the new developments including additional roads, clearly has a significant future impact on travel (person or vehicle trips), i.e. this will increase by approximately 30% during the planning period. What is not clear from the information provided is whether this figure is for the whole of the Canterbury District, i.e. since there is mainly discussion about the A2, there are implications that it may be for the Canterbury area only. Additionally, this 30% increase includes travel by rail and by bus but no indication is given as to what proportion of movements will be accommodated by these means. In our opinion this omission is unsatisfactory.

Paragraph 4.3.1. Little commentary is given on Figures 4.1 and 4.2. Obviously significant numbers of additional trips are generated at both am and pm periods in the areas where large additional housing developments are located. It is of importance to note that in the am period total departures across the District exceed arrivals, indicating that there is a net number of people who are having to leave the District in order to obtain employment. The additional numbers arriving and departing from/to both the South Canterbury and Herne Bay areas are about an extra 1,200 during peak periods.

Paragraph 4.3.3 (including Table 4-D). Here it is shown that, at 20 of the 26 locations where traffic flows have been modelled (i.e. the 13 x am and pm flows shown) the measured flows on link roads in the city will increase under the new developments, in some cases quite dramatically, e.g. in Broad Oak Road, New Dover Road, Whitstable Road, Rheims Way and Broad Street in the morning rush hour, and in St Stephen’s Road, Kingsmead Road and New Dover Road in the evening. The total traffic using the present Wincheap will substantially reduce following the development of a Wincheap Relief road, but the combined traffic on these two roads will be substantially greater than it is at present. The combining of the traffic flow is important to consider since nearly all traffic entering or leaving Wincheap passes under the rail bridge.

Comments on Table 4-D note (page 18) “... a general increase in traffic flows across Canterbury might be expected....” But given the additional roads and link being constructed, and given the policy of encouraging walking, cycling, buses, etc., surely the residents might not expect traffic levels to increase. After all, the District Transport Strategy has targeted for a reduction in traffic congestion over the planning period.

Paragraph 4.3.3. (A28 Wincheap). Despite the City Council’s much publicised concentration on the A2 slip roads as a means of reducing congestion in the city, this paragraph notes “The addition of the

southbound A2 off slip and large scale retail development in the Do Something scenario, will significantly increase forecast traffic flows in the Wincheap area.”

Paragraph 4.3.3. (Sturry Road). Since nearly 5,000 additional houses are planned to be located to the east of the A28 in Sturry Road, Canterbury, i.e. at Herne Bay, Herne, Broad Oak, Hillborough, Hersden and Sturry, we find it hard to believe that there will not be an excessive traffic impact on a Sturry relief road and on the urban stretch of A28 on the eastern outskirts of the city.

Table 4-D. An explanation is needed as to why the two way link flow figures for Broad Street in this Table do not match up to those shown in Figure 4 – 7.

Paragraph 5.2 and Table 5 – A. AM and PM peak flows are shown and discussed for Home-based workers and Home-based others. But only percentage figures are shown. This information is of less value if the volume of person trips involved is not given.

Paragraph 5.4. Again it is noted that “The model outputs demonstrate relatively modest modal shift to public transport”, but there is no numerical evidence to support these findings (except percentage figures for home-based working or “others”). The VISUM report also completely fails to adequately describe how walking and cycling numbers, and the use of trains or buses, are considered in any of the modelling.

Paragraph 6.2 (Tables 6 – A and 6-B). Here it is important to point out the considerable increase in total travel time (in vehicle hours on the road between the Do Minimum scenario and the Do Something scenario) in both the Canterbury District as a whole and in the Canterbury area itself. Thus in the morning peak time for the whole District the total traffic hours would increase by 8% but in the evening rush hour the traffic hours increase would be 19%. But for the Canterbury city area this increase rises from 14% in the morning peak to 33% in the evening. No explanation is given as to why these increases for the evening peak traffic hours should be much higher than in the morning peak. For the Canterbury city area this amount of increase is really quite disturbing. As Amey says travel time increases “reflect the more congested network associated with the higher development quantum and travel demand.” (page 24).

Paragraph 6.3 (and Table 6 – C). This section deals with journey times from various points around the outer periphery of the Canterbury urban area to various points at the edge of the inner core area. Looking only at the “Do Something” scenario compared to the Base data (for 2008) for both am and pm travel (inbound and outbound), it can be seen that journey times for 31 trips are increased, for 4 trips times decrease and 1 is the same. While some of the increases are not great others are quite considerable. Some examples of the time increases on important routes are:

- from the Wincheap roundabout to the A2 overpass trip times rise from 4.9 to 9.8 minutes in the morning peak period and from 5.6 to 12.9 mins in the evening peak period;
- from Tyler Hill to Broad Oak Road times rise from 2.7 to 8.2 mins in the morning peak period;
- from Broad Oak village to the Vauxhall Road/A28 roundabout times rise from 7.4 to 12.6 mins in the morning peak;
- and from the Vauxhall Road/A28 roundabout to the Tourtell Road roundabout in the evening trip times rise from 3.3 to 8.7 mins.

It is of interest to note that the paragraph comments on pages 24 to 25 focus on the four places where times are reduced and the comments ignore about 85% of the cases where times are increased! In fact trip time increases of this magnitude give us little confidence that traffic problems are being overcome, or even addressed, by the development scenario that has been modelled

