



DOVER LOCAL PLAN EXAMINATION: MATTER 3, ISSUE 1

DOVER HOUSING SITES (HALSBURY HOMES REF. 1232)

POLICY SAP1 – WHITFIELD URBAN EXPANSION

1 Introduction

- 1.1 This statement has been prepared on behalf of Halsbury Homes. It follows the Inspectors Notes ED 13 (Examination Guidance Note) and ED14 (Matters, Issues and Questions) and considers the soundness of the Submitted Regulation 19 Local Plan and Suggested Changes (SD04).
- 1.2 As background, Halsbury is a SME housebuilder with a long standing interest in the delivery of Whitfield Urban Extension (WUE) having led the formulation of the adopted 2011 Whitfield Supplementary Planning Document (SPD).
- 1.3 In April 2015 it secured outline planning consent for phase 1/1a of WUE (LPA ref. DOV/10/01010) for 1,250 residential homes, a 66 bed care home, 2 form of entry primary school, retail space and associated works ('the OPP'). Following the phased submission of various reserved matters, the scheme is being built out by Halsbury and others. In recognition of the pioneering nature of the OPP, the S106 agreement included considerable upfront investment for the wider WUE much of which has now been delivered by, or on behalf of, Halsbury. In transport terms this included works to establish the principal access into WUE from the A256 which cost in excess circa. £6.5 million and contributions towards Fastrack which is currently being delivered. Other infrastructure which benefits WUE beyond Phase 1/1a includes drainage, education and amenity/ecological land provision.
- 1.4 As part of the package of transport infrastructure Condition 10 of the OPP requires Halsbury to undertake defined upgrades to the Whitfield Roundabout prior to the construction of 801 homes. Paragraph 3.16 of the July 2023 Infrastructure Delivery Plan 'IDPv3' [ED7/7a] states that given the time that has elapsed since these works were originally envisaged, National Highways has modelled the extant mitigation scheme and concluded that this scheme does not create any meaningful capacity and advises that it would not support a s278 to allow it to be secured¹. Halsbury considers that any contributions which relate to the Local Plan growth must be fairly distributed against all future developments. It also considers that Halsbury should not be required to mitigate for any more than for its own site in the current situation, consistent with the relevant tests for planning obligations².

¹ Halsbury submitted application in December 2022 removes this condition LPA ref. 22/01713, which was appealed for non-determination (PINS ref: APP/X2220/W/23/3328672).

² a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development (Regulation 122(2) of the CIL Regulations; NPPF paragraph 57).



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2 Question 5 Response

Q5 If a revised masterplan is required, does this relate to the extension or the entire allocation? What impact will this have on the delivery of development across the site?

- 2.1 Proposed modifications AM29 and AM30 which propose to remove reference to a SPD are supported and respond to concerns expressed by Halsbury at the Regulation 19 stage of the plan. However, it remains unclear whether a masterplan should apply to the additional 600 homes or the whole of WUE. It also remains unclear how this process will work in practice and whether applicants can decide to bring forward their own masterplans and this should be clarified.
- 2.2 Of particular concern is how transport infrastructure requirements will be factored into any masterplanning process (see below).



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3 Question 7 & 8 Response

Policy SAP1(u) requires financial contributions towards improvements to the Whitfield roundabout and the Duke of York roundabout. For the Whitfield roundabout, the updated Infrastructure Delivery Plan ('IDP')¹⁶ states that the necessary mitigation involves a three-lane circulatory arrangement, with signalised arms and priority junctions, additional flare lanes and an extension of the existing underpass. For the Dule of York roundabout, the upgrades relate to the provision of additional lanes to approach roads, upgrades to the roundabout itself and provision of traffic lights.

Q7 In order to be effective, should the necessary upgrades be listed in Policy SAP1?

Q8 Has the scale of financial contribution required from the Whitfield Urban Expansion been established? Has it been tested to ensure that the allocation remains viable, and thus, deliverable and effective?

- 3.1 Halsbury considers that the approach and likely scale of financial contributions to road and other infrastructure (including the Whitfield Roundabout) must be identified as part of the local plan process to ensure that it is robust in transport and viability terms and has been subject to necessary scrutiny. Currently, criterion u of SAP1 merely states that financial contributions will be required in accordance with policy SP12; which itself only states that proportionate contributions will be sought³. On this basis the policy would allow the tariffs to be defined and updated in due course without necessary scrutiny possibly as part of any subsequent masterplanning process.
- 3.2 As we come on to explain in relation to Q9 and Q10, the Council's approach to tariffs appears flawed and the appropriate scale of financial contributions can't be established.
- 3.3 In ED5 'DDC response to Initial Questions for Examination' the Council explain that the 2022 IDP contains a number of caveats, with work ongoing to address them including in respect of White Cliffs Business Park's contribution to the tariff.
- 3.4 However, it not evident that this has been undertaken as part of the work for IDPv3 published in July 2023. The tariff remains unchanged at £1,500 per home and no contribution has been factored in for employment development.
- 3.5 To put the points around traffic generated by residential and employment land uses into perspective, and to demonstrate the proportionality of the load each places on the highway network, we turn to Tables 5.6 and 5.7 of document TIEB02a. The traffic generated by the collective employment allocations equates to c.22% (AM Peak) and c.19% (PM Peak) of all allocation traffic forecast in the DS1 assessment scenario and c.17% (AM Peak) and c.15% (PM Peak) of all allocation traffic forecast in the DS2 assessment scenario.

³ This is also referenced in new supporting text after paragraph 3.243 (AM20)



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- 3.6 In simplistic terms we are concerned that mitigation has been derived based upon the cumulative traffic demands arising from all allocated sites, but the tariffs for this mitigation have only been calculated and are directly related to residential allocations. The IDPv3[ED7/7a], at Appendix 3 describes how funding will be pooled from various additional sources to address the currently calculated funding gap for the delivery of both Whitfield and Duke of York roundabout improvements; however, no calculation or methodology is provided to demonstrate how the modelling and costings are proportionate.
- 3.7 Indeed IDPv3 acknowledges that it is based on incomplete and out of date transport modelling (paragraph 3.22) and has not taken into account post covid traffic data and modal shift improvements that could arise from Dover Fastrack both of which are inferred to result in reductions in traffic volume. It is also unclear whether the transport analysis takes into account criteria w of draft policy SAP1⁴ (which seeks targets and measures to achieve 10-20% modal shift). This will again result in a reduction in traffic volumes from those considered to date. The approach is contrary to paragraph 106 of the NPPF which requires development strategies and transport investment to be aligned.
- 3.8 Consistent with requirements of the current Whitfield SPD, Halsbury and other developers have been required to contribute to the Dover Fastrack scheme and it is therefore patently unfair and unsound for this not be accounted for in the modelling. The NPPF (paragraph 104) requires transport issues to be considered at the earliest stage of plan-making with transport impacts, infrastructure and opportunities for public transport use needing to be considered alongside each other. This approach has not been followed here. Instead, the evidence base adopts an unrealistic worst-case scenario, which ignores the significant investment in public transport by the public and private sector (through contributions) and means that the highway impacts have been over-estimated, leading to mitigation requirements being potentially overestimated and the corresponding proposed development tariffs likely to be too high. As we come on to explain, without further transport analysis it is not possible to properly identify impacts, infrastructure requirements associated costs and their fair apportionment across allocation sites.

⁴ As proposed to be modified by AM30 and states: *'The travel plan for the site should include targets and measures to achieve a modal shift from private car to sustainable travel modes of between 10 and 20%; and should include community engagement with new residents for the Fastrack service, with service updates, opportunities for feedback and incentives for use.'*



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4 Question 9 & 10 Response

The Council's response to the Inspectors' Initial Questions highlights that the initially agreed mitigation for the Whitfield roundabout, which required a scheme to be funded and delivered prior to occupation of the 801st dwelling, is no longer an acceptable solution. However, that position is established by the approved outline planning permission and associated planning obligation for Phase 1.

Q9 Taking the above into account, how will the Council ensure that the requirements of the Plan are met? Will the Plan be effective in securing the necessary mitigation?

Q10 In response to the Inspectors' Initial Questions, the Council also highlighted that the trigger points for providing the necessary mitigation can be pushed back. Does this need to be reflected in the Plan to be effective?

- 4.1 To inform this statement for Matter 3 and the one for Matter 7 Halsbury's Transport advisors, Mode, have carefully examined the evidence base underpinning the tariff approach for the Whitfield Roundabout and the extent to which development at WUE places demands on the transport network.
- 4.2 This review has identified a number of fundamental unresolved issues which remain unanswered and, without the further information and modelling, it is not possible to conclude whether the tariff approach proposed is sound and the plan will secure necessary mitigation as per question 9. It is noted that:
 - 4.2.1 Paragraphs 4.4.8 to 4.4.10 of document TIE02a describe growth assumptions related to Port of Dover traffic. These were last considered in April 2020, albeit at the time forecasting will have been subject to a great degree of uncertainty given the Covid-19 pandemic and Brexit. This is a baseline assumption inherent in all modelled scenarios and given the time that has elapsed since April 2020, should be revisited, even if just to revalidate the already utilised assumptions.
 - 4.2.2 Section 7.2 of document TIE02a considers sensitivity testing of the impacts of the Dover Fastrack scheme. The IDPV3 (paragraph 3.22) describes how Dover Fastrack has not been factored into modelling to derive mitigation triggers. We infer from this that the work reported in document TIE02a is purely informative and therefore question the approach to how this infrastructure has been considered given the certainty of its delivery and positive impacts that are foreseen in terms of reducing vehicular trip making?
 - 4.2.3 Paragraphs 5.2.13 and 5.2.14 of document TIE02a discuss windfall sites identifying how a further 1,120 dwellings have been identified to account for windfall development. It is understood that no infrastructure tariffs have



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been allocated to these developments despite them comprising a significant proportion of growth when considered relative to the identified site allocation quantum. This potentially leads to overestimation of future traffic conditions and hence mitigation requirements also being overestimated.

- 4.2.4 Paragraph 3.16 of the IDPv3 states that National Highways has modelled the Condition 10 Mitigation scheme. However, this modelling has not been provided to date to support this statement.
 - 4.2.5 No modelling has been provided to substantiate the claim that the safety led £200,000 scheme described in IPDv3 (para 3.24) does not fundamentally increase (or decrease) capacity. On behalf of Halsbury, Mode's preliminary modelling indicates a similar scope of works would provide adequate mitigation for Phase 1 of WUE.
 - 4.2.6 Specific modelling is needed to understand the impacts of the housing and other development at WUE itself, not just the wider zones referred to in Table 1 of IDPv3. WUE's main road access is from the A256 with limited (bus only) access from Whitfield Roundabout via Archers Court Road as well as via a new roundabout junction to be formed with the A2 to the west of Whitfield roundabout. These accesses in combination allow development related traffic to avoid the Whitfield roundabout in significant volumes as evidenced in document TIE02b, Appendix B, Technical Note 1, Figures 11, 13, 19 and 21.
- 4.3 Despite timely requests for information and escalating matters through freedom of information requests, responses to requests were only provided on 13 October 2023 leaving no meaningful time to analyse what had been provided. Information requests also remain outstanding (see appendix 1).
 - 4.4 In respect of question 10 and the trigger points, IDPv3 states that a further 1,250 homes at WUE can come forward in advance of the Whitfield Roundabout rather than the 801st trigger agreed in the OPP (IDPv3 paragraph 3.20). On this basis it should not be necessary for already consented development to contribute towards the Local Plan Mitigation works.
 - 4.5 The mitigation scheme has been derived based on a combination of factors, (i.e. residential plan growth, windfall growth and employment plan growth) over and above a calculated baseline position.
 - 4.6 In the transport assessments 800 dwellings of the OPP are included in the 2040 Do Minimum scenario (with no mitigation included at Whitfield roundabout), as summarised in document TIE02a. Mitigation has been derived to seek a nil-detriment solution when the DS1 and DS2 modelling scenarios (reflecting anticipated Local Plan and beyond conditions) are compared to the DM scenario. The mitigation therefore cannot be linked to the 800 dwellings at Whitfield WUE that are assumed in the DM scenario as the identified mitigation is not derived in relation to their impact.



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- 4.7 It is inferred in the IDPv3 Appendices [ED7A] that funds will be collected in relation to the extant consent at Whitfield in relation to the Whitfield roundabout mitigation scheme and via S106 towards improvement works at the Duke of York junction. It is unclear as to the full extent of the funds assumed in the tariff setting and, accordingly, it is impossible to assess whether these have been apportioned fairly and equitably across all development in the plan.
- 4.8 It is noted in Appendix 3 of ED7A that contribution tariffs have been adjusted downwards for development in the Dover Town Area given viability issues. No calculation is provided to substantiate the methodology or assumptions employed and nor is it clear whether the reduction in Dover area contribution tariff has resulted in an uplift in tariffs for other areas and the rationale behind doing so. Given the issues raised in these representations in respect of the calculation and apportionment of trip impacts, mitigation proposals and hence development tariffs we raise concerns as to the viability of the tariffs as they are currently presented.
- 4.9 It is clear that the position summarised in Appendix 3 of ED7A results in a shortfall of funding towards the required works at Whitfield and Duke of York junctions is inherent in the plan period. The Council suggests that the shortfall can be made up by a combination of existing Whitfield WUE S106 monies.
- 4.10 What is not presented are the calculations and assumptions combining all avenues of proposed cash collection to arrive at the c.£12M Local Plan mitigation pot. Without these it is impossible to undertake an objective review of the process followed, the proposed proportionality of contributions and whether these are realistically viable for the entirety of the planned growth.
- 4.11 At a simplistic level four area based tariffs are presented in Appendix 3 of ED7A, very little background information is provided to evidence why the tariffs are set at the levels currently proposed.

5 Conclusion and Recommended Actions

- 5.1 Any tariff for highways infrastructure, including the Whitfield Roundabout, must be identified as part of the local plan process, with specific reference to and justification for the tariff in policy documents not hidden away in the evidence base (IDPv3 & transport assessments).
- 5.2 However, the tariff as proposed appears to be fundamentally flawed and fails to meet the tests for planning obligations². The analysis of transport demand must take into account public transport provision (including the committed Dover Fastrack) and employment and other non residential development. Otherwise the analysis and scope of transport upgrades which developers must contribute to is not proportionate to their likely impacts.
- 5.3 These flaws have been acknowledged by the Council themselves. However, what is not clear is whether the modelling itself is robust as required by the NPPF. It remains unclear what specific demand the housing at WUE places on Whitfield Roundabout.



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- 5.4 However, what is clear is that assumptions about the contribution to be made by the Phase 1 developer are no longer valid and mean that this development must disproportionately contribute to transport upgrades whilst other housing contributes significantly less. Employment development is also required to contribute but this hasn't been accounted for in the analysis and tariff setting. As the Council acknowledge the Whitfield Roundabout upgrades are not needed until after the delivery of the majority of Phase 1/1a of the OPP.
- 5.5 In our view, most of these shortcomings cannot be addressed through changes to the wording of the policy or deferring the tariff setting. The scale and justification for any tariff must be established as part of the local plan process to understand its implications in terms of the deliverability of the plan's policies. This requires transport modelling to be updated to include consideration of public transport and travel planning measures and tariffs to account for employment uses to ensure that phase 1 of the OPP (and other development delivering housing growth) are not overburdened by the costs of junction upgrades.



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APPENDIX 1

Sean Bashforth

From: Ashley Taylor <Ashley.Taylor@DOVER.GOV.UK>
Sent: 13 October 2023 14:40
To: Sean Bashforth
Cc: James Millard; Ben Fairgrieve
Subject: RE: Whitfield - List of requirements
Attachments: 211028_WhitfieldRoundaboutMitigation_TechnicalNote_Base Year.pdf; Whitfield Roundabout_Base Year.pdf; Whitfield Roundabout_Reg19.pdf; Whitfield Roundabout Local Plan mitigation scheme T16 Report.pdf

Dear Sean

Please find attached the model files for the Local Plan Whitfield roundabout modelling as requested. Also attached is a technical note regarding the calibration of the model, which as I have previously advised has been through review and sign off by the Highways Authorities.

The team is still sourcing the other information requested, and I will provide it as soon as I am able to.

Regards
Ashley



Mrs Ashley Taylor
Planning Policy and Projects Manager
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My usual working days are Monday to Thursday

From: Sean Bashforth <sean.bashforth@quod.com>
Sent: Thursday, October 12, 2023 1:02 PM
To: Ashley Taylor <Ashley.Taylor@DOVER.GOV.UK>
Cc: James Millard <jamesmillard@halsburyhomes.com>; Ben Fairgrieve <benfairgrieve@modetransport.co.uk>
Subject: RE: Whitfield - List of requirements

Hi Ashley

Just following up again on this. It was promised for last Thursday. Given that it is modelling which has been undertaken – there shouldn't be any delay in sharing it?

Many thanks

Sean



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From: Ben Fairgrieve <benfairgrieve@modetransport.co.uk>
Sent: Tuesday, October 10, 2023 4:04 PM
To: Sean Bashforth <sean.bashforth@quod.com>; Ashley Taylor <Ashley.Taylor@DOVER.GOV.UK>
Cc: James Millard <jamesmillard@halsburyhomes.com>
Subject: Re: Whitfield - List of requirements

Dear Ashley,

Is there any update on the information requested please?

I look forward to hearing from you.

Kind Regards,

Ben Fairgrieve BA (Hons) MCIHT
Director

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Regards

Ben Fairgrieve

From: Sean Bashforth <sean.bashforth@quod.com>
Date: Monday, 9 October 2023 at 09:37
To: Ashley Taylor <Ashley.Taylor@DOVER.GOV.UK>
Cc: James Millard <jamesmillard@halsburyhomes.com>, Ben Fairgrieve <benfairgrieve@modetransport.co.uk>
Subject: RE: Whitfield - List of requirements

Morning Ashley

Are you able to provide an update on when this information will be available (also any luck with the further requests from National Highways?)

Many thanks

Sean



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From: Ashley Taylor <Ashley.Taylor@DOVER.GOV.UK>
Sent: Friday, September 29, 2023 2:03 PM
To: Sean Bashforth <sean.bashforth@quod.com>
Cc: James Millard <jamesmillard@halsburyhomes.com>; benfairgrieve@modetransport.co.uk
Subject: RE: Whitfield - List of requirements

Dear Sean

Please see response to requests below, the information we can provide will follow under separate cover. The Council's transport consultant has not been available this week, so the information requested will follow next week.

The responses to the questions about the Interim Signs and Lines scheme will be provided by National Highways separately.

Longer Term – Signalisation – Mitigation scheme at Whitfield roundabout

- Confirmation that the latest proposed scheme and traffic modelling position is summarised in the DDC Reg 19 plan examination document TIEB02b with the proposed scheme illustrated on drawing 70084289-WSP-HGN-WFR-SK-CH-0 Rev P01. [Yes, and also covered in TIEB02a](#)
- Appendix A of Document TIEB02b describes Junctions and TRANSYT modelling but no outputs are appended. Please can the model files be made available for consideration in line with the manner in which the evidence for other junction locations has been presented. [Yes](#).
- Has the JUNCTIONS model reflecting the current arrangement been calibrated and if so can details of this be shared? [Yes, with review and sign off by NH and KCC](#).
- Can select link analysis be completed to demonstrate desired traffic distribution from phases 1/1A of Whitfield UE specifically as I note the balance of the consent is first addressed in the DS1 scenario alongside a further 2,000 dwellings making identification of direct impacts challenging. [Yes, this can be provided](#).
- Referring to TN1 (National Highways Regulation 18 Comments) – Appendix M DDC Reg 19 plan examination document TIEB02b on what basis was the decision made to exclude the consented balance of phases 1/1A at Whitfield Urban Extension and the linked mitigation scheme at Whitfield roundabout secured through condition 10 of consent DOV/10/01010 from the DM scenario modelling? [This is set out from para 3.3.5 of the Regulation 18 Forecasting Report \(TIEB05\) and at para 3.4.2 of the Reg 19 Forecasting Report \(TIEB02a\), para 3.16 of IDP](#).
- What analysis underpins this decision as we would expect to see consented commitments (and linked mitigation proposals) included in a forecast year DM scenario in full? As with the above requests, should such analysis be available we request detailed traffic data, assumptions employed and traffic model files used to arrive at and substantiate the position. [TBC with National Highways](#).

Kind Regards
Ashley

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My usual working days are Monday to Thursday

From: Sean Bashforth <sean.bashforth@quod.com>
Sent: Friday, September 22, 2023 3:42 PM
To: Ashley Taylor <Ashley.Taylor@DOVER.GOV.UK>; Luke Blaskett <Luke.Blaskett@DOVER.GOV.UK>
Cc: 'James Millard' <jamesmillard@halsburyhomes.com>; Ben Fairgrieve <benfairgrieve@modetransport.co.uk>
Subject: FW: Whitfield - List of requirements

Both

Further to our discussion earlier, please see below the queries from Halsbury's transport advisors.

As discussed, we would be grateful if this could be provided as soon as possible (by the end of next week – 29 September).

Thanks and Regards

Sean



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From: Ben Fairgrieve <benfairgrieve@modetransport.co.uk>
Sent: Friday, September 22, 2023 3:06 PM
To: Sean Bashforth <sean.bashforth@quod.com>
Cc: James Millard <jamesmillard@halsburyhomes.com>
Subject: Whitfield - List of requirements

Dear Sean,

As discussed please see the below wish list for the various authorities in relation to Whitfield:

Interim – Signs and Lines – Mitigation scheme at Whitfield roundabout

- Confirmation that drawing 110546-sk-01 Rev P0 (prepared by Systra) is the proposal now being pursued?
- Confirmation of the baseline traffic position from which this arrangement has been derived and is there a view as to the capacity lifespan of this scheme from NH?
- Traffic flow data, subdivided by user group (e.g. surveyed, traffic growth, committed developments etc) that have informed the proposal.
- The JUNCTIONS model(s) that define current operation (if the roundabout is not mitigated) and the proposals, noting that kerblines amendments are illustrated on drawing 110546-sk-01 Rev P0 that will impact capacity on the Whitfield Hill approach. Furthermore the inclusion of hatching on exits, channelising markings on the circulatory and directional arrows on some approaches will influence current lane usage and again impact upon junction capacity.

- For the JUNCTIONS model reflecting the current arrangement has this been calibrated and if so can details of this be shared?
- Confirmation of the delivery timetable for this scheme and funding position.

Longer Term – Signalisation – Mitigation scheme at Whitfield roundabout

- Confirmation that the latest proposed scheme and traffic modelling position is summarised in the DDC Reg 19 plan examination document TIEB02b with the proposed scheme illustrated on drawing 70084289-WSP-HGN-WFR-SK-CH-0 Rev P01.
- Appendix A of Document TIEB02b describes Junctions and TRANSYT modelling but no outputs are appended. Please can the model files be made available for consideration in line with the manner in which the evidence for other junction locations has been presented.
- Has the JUNCTIONS model reflecting the current arrangement been calibrated and if so can details of this be shared?
- Can select link analysis be completed to demonstrate desired traffic distribution from phases 1/1A of Whitfield UE specifically as I note the balance of the consent is first addressed in the DS1 scenario alongside a further 2,000 dwellings making identification of direct impacts challenging.
- Referring to TN1 (National Highways Regulation 18 Comments) – Appendix M DDC Reg 19 plan examination document TIEB02b on what basis was the decision made to exclude the consented balance of phases 1/1A at Whitfield Urban Extension and the linked mitigation scheme at Whitfield roundabout secured through condition 10 of consent DOV/10/01010 from the DM scenario modelling?
- What analysis underpins this decision as we would expect to see consented commitments (and linked mitigation proposals) included in a forecast year DM scenario in full? As with the above requests, should such analysis be available we request detailed traffic data, assumptions employed and traffic model files used to arrive at and substantiate the position.

Kind Regards,

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