

Greater Nottingham - Broxtowe Borough, Gedling Borough and Nottingham City Aligned Core Strategies Publication Version June 2012

Response of **Linby Parish Council & Papplewick Parish Council** to
Inspector's Matters, Issues and Questions

MATTER 6: TRANSPORT (Q. 2, 5 & 7)

Background

- .1 The representations made here, which build on earlier representations made to the Broxtowe Borough, Gedling Borough and Nottingham City Aligned Core Strategies on behalf of Linby Parish Council & Papplewick Parish Council ("the Parish Councils") are made specifically in respect of the policies and proposals relating to Gedling Borough, unless otherwise stated.

Question 2

Response

- .2 The proposed allocations of the two SUE sites at Top Wighay Farm and land North of Papplewick Lane were made in advance of the modelling output from the transport study, which was only completed and published after the public consultation on the publication version of the ACS. Undertaking a study of this kind so late in the process is clearly contrary to the principles of good planning and it invariably raises the question as to whether the transport study has been 'retrofitted' to support the allocations, rather than having formed the key evidence base upon which land allocations in the ACS have properly been made.
- .3 Taking the above into account, the Parish Councils have commissioned a local transport consultant (Bancroft Consulting) to review the various transport background papers and information upon which GBC has relied for its justification of allocating the two SUE sites (amongst other allocations) and to advise upon any issues arising. The letter, dated 18th September 2013, is appended to this representation to form Appendix A.
- .4 The advice that the Parish Councils have received suggests that there is evidence to counter the claim that there should be no 'showstoppers' in transport terms and brings into question the justification for the ACS's spatial strategy on transport grounds. It should be made clear that the advice that has been requested was propagated on the basis that local residents are already aware of the traffic issues on the road network in and around the two SUE sites and any increase in the volume of traffic along these roads will only make matters worse.
- .5 There are four aspects of the transport modelling that has been undertaken to inform the site allocation process for the ACS (reported in November 2012) which Bancroft Consulting draw into question. These are summarised below.

- .6 The first concern relates to the 'approach' adopted in the transport modelling exercise. The approach appears to assign average trip rates to the highway network using an 'all or nothing' process, rather than selecting the higher 85th percentile rates for the proposed site allocations and assigning them using a 'capacity restraint' process. Consequently, this simplistically assumes that a constant proportion of trips made at congested locations throughout the network would disperse into adjacent time periods or along alternative routes. The results have therefore only given a partial account of the true impact that development trips could have.
- .7 The second concern relates to the effect from vehicles that re-route away from the strategic network onto local roads. The model does not appear to have fully accounted for circumstances where significant congestion leads to 'rat running' through local (some rural) roads and the implications that this would have. The recorded accident details for the highway network in the vicinity of both SUE sites reveal that there have been several serious or fatal accidents, particularly along the B6011 (Forest Lane/Linby Lane) and Moor Lane, and any significant traffic increases along these routes could lead to further serious accidents. The NPPF requires safe access for all road users but Bancroft Consulting has expressed "*severe concerns*" that the matter of highway safety has not been fully addressed in advance of the proposed allocation of the two SUE sites in the ACS.
- .8 The third concern regarding the modelling approach relates to the 'global' split of 85% car trips and 15% public transport trips being applied to all residential trip rates for all sites. It appears from the modeling report that a constant modal split has been applied for all sites throughout the model – which is circa 85% car based trips (this varies by a very small amount through the different scenarios). However, later on in the report when it addresses the specific issues at Top Wighay Farm and land North of Papplewick Lane, there is some discussion on how a figure of around 97% is more appropriate for these locations. The inference is, on the face of it at least, that a low modal split is being used to assess vehicle impact (85%) but then this changes when the consideration turns to potential public transport requirements (97%). This would suggest that car based traffic generation in the area has been underestimated by as much as 11% for Top Wighay Farm and 12% for land North of Papplewick Lane. Taking account of the use of only average trip rates, this could lead to an increase of up to 20% in the amount of peak hour trips occurring within the local highway network. Conversely, the predictions for public transport demand must be adjusted to reflect the 15% proportion assumed within the traffic modeling process, with consideration given to the greater pressure on public transport services that this would require.
- .9 The fourth concern relates to the conclusion that only improvements to the Bus Route Number 141 would be required to address the infrastructure needs of development at Top Wighay Farm. If this route is to adequately serve the proposed development site, then it must be diverted closer to the NET station to ensure a seamless link between modes of public transport, otherwise people are more likely to use private cars. Moreover, it is highly questionable as to whether the bus operator would commit to such a diversion on what is a strategic bus route competing with the tram and whether there is the funding availability and/or commitment to increase the number of buses along this route to accommodate increased patronage levels.

- .10 For the reasons set out above, the Parish Councils are of the opinion that there is evidence that brings into question the soundness of the ACS's spatial strategy in transport terms. The evidence would suggest a much greater impact on the local highway network and a much greater level of infrastructure requirements needed to deliver the two SUE sites.

Question 5

Response

- .11 The Parish Councils are of the opinion that the spatial strategy for growth as set out in the ACS¹, with particular reference to the proposed SUE sites at Top Wighay Farm and land North of Papplewick Lane, has not had sufficient regard for making the most efficient use of existing transport infrastructure in the plan area or for maximising accessibility by sustainable means of transport (i.e. non-car borne journeys).
- .12 With regard to GBC, there are no strategic housing or employment land allocations within or adjoining the Nottingham PUA but 1,600 dwellings and 9 hectares of employment land are proposed on the periphery of Gedling Borough, adjacent to Hucknall. The clear purpose of the strategy of urban concentration with regeneration is to direct significant amounts of development into the more accessible (sustainable) parts of the Greater Nottingham conurbation, that being the main urban area of Nottingham. Moreover, whilst the two SUE sites are *reasonably* located to Hucknall town centre, they are not *especially* well located to it. The sites are not within easy walking distance of urban facilities in Hucknall, including the NET tram station, and whilst extended and augmented bus services could be put in place to connect future residents of housing on these sites to the town centre, Hucknall is not contiguous with the main urban area of Nottingham.
- .13 It is clear that other potential development sites are more sustainable in accessibility terms to the Nottingham PUA and Nottingham City Centre than the two SUE sites. Teal Close is located adjacent to the Nottingham PUA and the Gedling Colliery/Chase Farm site is located within the Nottingham PUA. These locations have excellent transport connections and would make the most efficient use of existing transport infrastructure in the plan area and maximise accessibility by sustainable means of transport.
- .14 Recent developments regarding the now likely implementation of the Gedling Access Road within the plan period has significantly changed the basis on which the ACS has to date been planned. The site allocations in Gedling Borough should therefore be revised to ensure that the most sustainable sites are developed first and foremost. In its current form, the ACS is unsound.

Question 7(a)

Response

¹ The Greater Nottingham – Broxtowe Borough, Gedling Borough and Nottingham City Aligned Core Strategies Publication Version June 2012

- .15 Despite the proposed allocation of Top Wighay Farm as a substantial SUE that would accommodate 1,000 new dwellings and 9 hectares of employment land adjacent to, but outside of, the Hucknall urban area, it would appear from 'Appendix B' of the ACS that there are no critical infrastructure requirements in transportation terms to facilitate development in this location. The Infrastructure Delivery Plan requirements for the site (as set out in 'Appendix A' of the ACS) make reference to an integrated transport/walking and cycling package (with no details) and potential link buses to Hucknall NET/train station (also with no details). The lack of information in respect of exactly what is required and what will be done to facilitate the development of the site is a serious flaw in the soundness of the ACS, particularly in light of the evidence that has been presented to the Parish Councils by Bancroft Consulting (above).
- .16 Moreover, the Appraisal of Sustainable Urban Extensions Study undertaken by Tribal in 2008 (CD/KEY/08) identified that Top Wighay Farm was potentially suitable for mixed-use development **subject to a tram extension**. This key requirement does not appear to form any part of the critical infrastructure requirements set out in the ACS. Instead, reliance is now placed on a "link" bus. This approach must be brought into question, particularly given the 'retrofitted' nature of the modelling output from the transport study.
- .17 Since the preparation of the 2008 Appraisal, Nottinghamshire County Council has stated that the two sites at Top Wighay Farm and land North of Papplewick Lane can (now) be developed for 1,600 dwellings (in total) and employment uses without the need for an extension to the NET line. This is clearly contrary to the advice in the 2008 Appraisal, which suggests that these sites are only viable for development if an extension to the NET line was achieved. The report goes on to highlight that planning permission has been granted for two junctions from A611/Wighay Road as a virtue of the development of the Top Wighay Farm site. However, the junction alterations will only benefit private vehicle users, it does not make the most efficient use of existing transport infrastructure or maximise accessibility by sustainable means of transport.
- .18 The County Council's report also suggests that Hucknall has good transport links. However, the tram station facility is already operating at over 100% capacity with no clear mitigation strategy to cope with an additional 1,600 dwellings (in addition to the Bestwood Strategic Location) and 9 hectares of employment land. The Parish Councils are of the opinion that the package of transport measures outlined for Top Wighay Farm and land North of Papplewick Lane are significantly lacking in detail and evidence to demonstrate that they will be sufficient to ensure the sustainable delivery of these Sustainable Urban Extensions.

Question 7(c)

Response

- .19 GBC is of the opinion that the Gedling Colliery/Chase Farm site which is identified (in Policy 2) for future housing development can only be developed following the construction of the Gedling Access Road, for which provision is made for its route in the ACS. The site has not been allocated for development in the ACS because it was considered that the provision of the access road would not be deliverable within the plan period.

- .20 Recent developments regarding the funding and resultant timescales for the delivery of the Gedling Access Road has significantly changed the basis in which the current distribution of development in Gedling Borough has been derived. A copy of the letter from GBC confirming this (dated 10 September 2013) is appended to our response to Matter 2 (The Spatial Strategy and Housing Policy).
- .21 Notwithstanding these significant change in events, GBC maintains that the “*potential to develop the Gedling Colliery site does not change the position with regard to the Core Strategy*”. The Parish Councils fail to see how they could not.

Relevant hearing session: Week 2 – Tuesday 5th November: Day 4 (2pm)²

Word count: 2,099

Date: 18th September 2013

² Examination hearing session as per draft programme dated 22 August 2013

Appendix A

bancroftconsulting
transport consultancy services

Bancroft Consulting Limited

Jarodale House
7 Gregory Boulevard
Nottingham
NG7 6LB

t 0115 9602919
f 0115 9648201
e office@bancroftconsulting.co.uk

Linby Parish Council
c/o Gaskell Construction Consultants
Victoria House
104 Mansfield Road
Nottingham
NG1 3HD
FAO: Mr Simon Molsom

Our Ref: CJB/F13098/180913
Date: 18 September 2013

BY EMAIL ONLY

Dear Simon

**GREATER NOTTINGHAM ALIGNED CORE STRATEGIES REVIEW
CONSIDERATION OF PROPOSALS AT TOP WIGHAY FARM AND LAND NORTH OF
PAPPLEWICK LANE**

I refer to our recent discussions and emails in respect of the above. I have now reviewed a number of key documents prepared in support of the Aligned Core Strategy Review and would offer the following comments on the issues that I believe could affect Linby Parish Council's position regarding its potential support for the adjacent Top Wighay Farm and Land North of Papplewick Lane schemes.

My comments have been based on the following documents, which were downloaded from Gedling Borough Council's website for consideration:

- Transport Background Paper December 2012
- Transport Background Paper Addendum May 2013
- Infrastructure Delivery Plan May 2013 (Version 3)
- Greater Nottingham Core Strategies Transport Modelling: Report for Greater Nottingham Local Authorities November 2012 [GNCSTMR]

It is evident from the various details presented within the GNCSTMR that the objective of the review and modelling process is merely to identify any 'showstoppers' in the delivery of various sites for both residential and employment uses. As such, the model is based on key strategic links throughout the county and considers the effect of major infrastructure improvements at a Design Year of 2028.

One point that is not clear from the GNCSTMR is the nature of the assignment process. The approach adopted appears to assign average trip rates to the highway network using an 'all or nothing' process, rather than selecting higher 85th percentile rates for the development uses and assigning them using a 'capacity restraint' process. This therefore simplistically assumes that a constant proportion of trips made at congested locations throughout the network would disperse into adjacent time periods or along alternative

routes. Hence, the results only give a partial account of the true impact that development trips could have. For example, the routes between Nottingham and Mansfield are already congested during peak periods and there is no allowance made within the modelling process for displaced trips that may end up saturating the hour prior to the identified peaks, which would then have a knock-on effect for the results presented for the peak hour.

In addition to the trips displaced by time, I also have concerns about the effect of vehicles that re-route away from the strategic network onto local roads. Journeys between the Top Wighay Farm or Land North of Papplewick Lane sites and Nottingham could have many competing routes, where significant congestion would lead to 'rat-running' through local and potentially rural roads. The model does not appear to have fully accounted for this scenario and evidence presented by RoSPA states that 80% of car user deaths occur on rural roads, which is a pattern also reflected in the serious category (www.rospa.com/roadsafety/adviceandinformation/highway/rural_roads.aspx). For information on the potential cost implications of increased accidents within the public highway, further advice provided by the Department for Transport in their Reported Road Casualties in Great Britain: 2011 Annual Report states that the average cost per road accident in 2011 was as follows:

- Fatal £1,877,583
- Serious £ 216,203
- Slight £ 23,136

Inspection of recorded accident details for the surrounding highway layout (for January 2007 through to December 2011 – www.crashmap.co.uk) shows many areas in the immediate vicinity of both sites, particularly along the B6011 (Forest Lane/Linby Lane) and Moor Lane, where several serious or fatal accidents have occurred. Any significant traffic increases along these routes could lead to further serious accidents which, setting the physical and emotional issues to one side, would have major financial implications for the public purse.

To illustrate this I have identified a few examples of specific locations with serious accident problems. The first location is at the B683/B6011 crossroads junction to the east of Linby, where 'crashmap' shows 4 slight accidents recorded for the five year period covering 2007 through to 2011, with a further 2 slight and 1 serious accident to the west and 6 slight and 1 fatal accident to the east. Inspection of this section of highway indicates how the junction has extremely restricted visibility from the minor arms and a relatively straight alignment at the major arm (B6011) that could very well encourage high approach speeds, regardless of the speed limit. There also appears to be little or no scope to improve this junction due to adjacent land ownership boundaries. The second location is at the northbound carriageway of the A611 (Annesley Road) where 6 slight and 5 serious accidents were recorded within the same time period, along a 500 metres long section of carriageway. These two examples are by no means isolated and there are many other locations that indicate how the highway network is extremely sensitive to any traffic increases, particularly those associated with the Top Wighay Farm and Land North of Papplewick Lane sites.

Current Central Government planning policy contained within the National Planning Policy Framework emphasises the need for local authorities to promote sustainable development. Whilst it must be noted that these policies place less importance on the need to resolve peak hour congestion issues, it does maintain the fundamental principle that all development must deliver safe access for all users. Whilst it is accepted that planning applications for each of the two schemes should in theory address the safety implications of their impact, I would express severe concerns that the serious matter of highway safety must be resolved in advance of any commitment to allocate within the Local Plan. The extent of problems

already in existence suggest that fundamental changes to the current operation of the road network will be required and these could clearly affect the viability of delivering the schemes being considered.

Other general concerns regarding the modelling approach relate to a 'global' split of circa 85% car trips and 15% public transport being applied to all residential trip rates, at each of the development sites (Table 6.3 of the GNCSTMR). However, Table 7.1 of the report highlights how a 96% car trips and 4% public transport split is anticipated for the Top Wighay Farm residential development and 97% and 3% for the Land North of Papplewick Lane. The inference here is that traffic impact issues have been established using the lower 85% proportion of vehicle movements, whereas the subsequent discussion regarding any need to improve public transport services switches to a less onerous split for that particular mode group. Assuming that the specific splits for the two sites are accurate, this would suggest that car based traffic generation in the area has been underestimated by as much as 11% for Top Wighay Farm and 12% for Land North of Papplewick Lane. Added to the fact that only average trip rates have been used, this could lead to an increase of up to 20% in the amount of peak hour development trips actually occurring within the local highway network. Alternatively, the predictions for public transport demand must be adjusted to reflect the 15% proportion assumed within the traffic modelling process, which would ask greater questions of the existing services and is likely to require major improvements from that already identified.

As regards the conclusion that only improvements to the Route Number 141 should be required to address the infrastructure needs for the Top Wighay Farm scheme, it is noted that the Rainbow 3 route currently passes some distance from the NET Station (approximately 400 metres). If this route is to adequately serve the proposed Top Wighay Farm development then it must be diverted closer to the station to ensure a seamless link between modes, as residents and employees will otherwise simply continue to use their car for any journeys between Nottingham and the site due to the perceived delay and inconvenience. It is also highly questionable as to whether the bus operator would commit to such a diversion on what is clearly a strategic bus route that exists in competition with the tram. In addition, given the current lead time of vehicles on this route, it is likely that larger vehicles would need to be purchased to accommodate increased patronage levels whilst also maintaining the current frequencies, which will have substantial cost implications. This matter must be resolved, at least in principle, when allocating either of the two sites, to avoid it being overlooked during the planning stage.

I trust the above details are clear and of assistance with any representations the Parish Council may wish to make. Please do not hesitate to contact me should you have any questions or require further information.

Yours sincerely

Chris Bancroft
Director
Bancroft Consulting
t: 0115 9602919
m: 07786 966615
e: office@bancroftconsulting.co.uk