

## **Representation No 2 re Sustainable Communities chapter 8**

### **Policy SC2 Securing Sustainable Transport**

#### **Legally Compliant Yes**

Comment.

There is a transport assessment as legally required for a development such as St Georges Barracks (SGB). This was dated April 2018, admitted to be high level, and it is inadequate in content for a development of this nature. The later and more detailed transport assessment of November 2018 is after the last of the Regulation 18 consultations. Stakeholders have therefore been denied adequate traffic assessment impact at the most relevant consultation stage.

#### **Is the pre submission Local Plan sound No**

Fails the test of consistent with national policy

Comment

Empingham Parish Council have contributed to the cost of engaging traffic consultants, who will present detail in the necessary technical format. What follows is a laymans interpretation of our representation in a form which our residents can understand and on whose behalf we make the representation.

Section 9 of the National Policy Planning Framework sets out Government expectations for sustainable transport. Para 108 explains that when assessing sites for development such as SGB it should be ensured that:-

- a) Appropriate opportunities to promote sustainable transport modes can be taken up given the type of development and its location.
- b) Safe and suitable access to the site can be achieved for all users,
- c) Any significant impacts from the development on the transport network in terms of (capacity and congestion), or on highway safety can be cost effectively mitigated.

The Local Plan fails these tests in both a local village context and in Rutland as a whole.

### **Local Context**

The Campbell Reith Hill report para 11.5.23 states that the SGB site will generate significant traffic movement through Empingham, especially to the A1 northbound. The suggested solution is in our view ludicrous. The mitigation measure for A1 northbound traffic is a new right turn lane off the A606 down Main St. The diagrammatic presentation, junction 12 in the report, shows the new right turn lane to start opposite the Audit Hall. This is an extremely narrow section where two container lorries cannot pass side by side. To immediately progress to another lane in the 15 yards before the junction with Main St is in our view impossible. Our traffic consultant will need to assess the technical detail, when sufficient information is provided, which to layman seem impossible. The Cambell Reith report admits to representation not detail. As our traffic consultant regards the trip rates used as very low for the reasons he sets out, this has further implications for the village. Again we see the evidence being collected as slanted to support the predisposition of support for this site which we exemplify in a number of areas. The trip rate information used in the AECOM report in April 2018 and which informed the regulation 18 consultation were markedly higher.

The Campbell report and its implications for the village was published in November 2018, some months after the closure of the focused consultation on SGB. Thus the Reg 18 stage of consultation when residents could comment on more than just legal compliance and soundness, had passed before relevant information was available to the public. There was considerable opposition within the village to the scale of SGB, the largest village meeting for years, there would have been considerably more opposition if the Campbell Reith report had been available at the so called focused consultation stage in August 2018.

Main St is a typical rural village main street, all of it in a conservation area. Many of the properties on the roadside are of considerable age and many do not have off street parking. This already causes traffic problems especially at school times and surgery opening hours. The A1 end of the street is protected by a one way chicane layout to slow down traffic entering the village from the A1. The considerable demolition, construction and residential traffic generated by SGB will make road conditions intolerable to both users and villagers. The usual mitigation measures such as better separation of pedestrians and traffic will be impossible in certain sections of Main st., especially between Loves Lane and the school entrance. At the very least we would expect an Environmental Impact Study to be available for our village.

The traffic surveys completed to augment the calculations of the RCC consultant were completely inadequate. A few hours in October 2017 completely misses the traffic generated by Rutland water in the summer months. Most weekends in the summer during school holidays, traffic queuing to get into Sykes Lane car park results in tailbacks beyond the junction in question.

Empingham is a prime example of the villages which will be badly affected by a large new town decanting traffic onto a rural road network which is totally inadequate to connect that new town to the primary road network. A new town in a location that compares very badly to more sustainable locations on the edges of Oakham, Uppingham and Stamford which can meet our housing needs.

There will be other villages similarly affected, for example the T junction in Ketton which will be the rat run for traffic from this site to the A1 south.

Many of the comments we make below in a county wide context are also relevant to our village, especially the silly assumptions about homeworking at SGB and new bus routes reducing car transport. Nevertheless in a purely local context on a village basis we contend that the Plan is unsound in not meeting test c) above

### **Rutland Wide Context**

We repeat the Campbell Reith Hill transport assessment report was completed in November 2018, after the last of the regulation 18 consultations, this information was thus not available at the stage when it was most appropriate. The AECOM report which preceded the Campbell report, and which was available, was even more lacking in the detail required to support soundness. The AMEY desk top exercise, again produced out of time, is simply concerned with the technical approach of the two reports, not the efficacy to meet the tests of soundness.

## 1 Safe and Secure Access

The main access and egress roads are two new roads to the north of the site which will require the widening of Wytchley Rd. In the Infrastructure Development Plan a sum of £1m has been set aside for this. A round figure which is a sure giveaway to inadequate detailed consideration. The sum is to be met from the seemingly inexhaustible HIF grant. The Ketton cement company which recently opened a new stretch of road to detour this road to enable more quarrying to take place, publicly announced that the cost had been £7.5m. for a shorter section than will be necessary to connect the SGB site.

The ownership of the land for the new access roads is not in the ownership of either the MOD or the Council. CPO powers will probably have to be invoked at what impact to timescales for development.

There are no detailed drawings for junction improvements accompanying the Plan and traffic surveys are out of date and inadequate.

## 2 Sustainable Transport

There is very little information in the Plan about alternative modes of transport to the car, which the Government is intent on reducing as part of their climate change initiatives. A fundamental conflict with national policy.

The information used to calculate trip rates from households created is drawn from sites near to major centers of population. Not applicable to this rural site. Just one of the reasons our consultant disagrees with trip rates used.

The survey which shows that Rutlanders use their car for 37% of the time to travel to work and 63% use public transport defies local logic. There is very little public transport, a large part of the population is

retired and the household income figures do not support public transport use. The detail backing up this assertion should be opened up to challenge.

There is no buy in from bus operators. The public bus services in Rutland were significantly reduced two years ago when one of the major operators moved their depot from Melton to Nottingham. Vague references to pump priming from the inexhaustible HIF monies have to be clarified with bus company capacity. At the rate of build out of the site it will be several years before any critical mass is reached to support any commercial service. The cost of pump priming during the early phase of the development which Campbell Reith states is a necessity should be identified and funding source identified, as should suggested routes and timings.

SGB is similar in size to Lodge Farm a site that was considered for allocation in the Rugby Local Plan, a site for 1550 dwellings in a rural location, similarly distant to main settlements. The Inspector dismissed the site due to its inability to sustain a viable public transport system given the disparate destinations for travel. This is analogous to SGB, where are the buses, such as they are, to be routed. Oakham, Uppingham, Stamford, Corby, Peterborough, Melton, all locations for work and leisure.

The recent publication Garden Villages and Garden Towns; Visions and Reality (Transport for New Homes June 2020) highlights the large gap between aspiration and reality in public transport support for new settlements. SGB is at the lower end of such settlements in terms of size which will exacerbate dependence on car travel.

In reality SGB will be a car dependent dormitory commuter estate despite the vague words and pretty pictures.

### 3 Impact on the Highway network and Road Safety

To get to the A1, A606, A47 A6003, the major roads in the county, all traffic during and after demolition, construction and occupation, will have to traverse narrow rural roads. The Plan asserts, section 4, that the site has adequate accessibility for walking and cycling to a number of local villages. This is not evidenced in terms of footways, lighting crossing points etc. Residents would not use grass verges to travel from the site to the Luffenhams for example.

The major junction impacted is dismissed as ongoing work. The A606/A1 junctions both north and south are already inadequate. There is a regular tailback on the A1 north to access the A606 at evening peak time. There are other significant developments to the north of Stamford which will impact these junctions. It is simply not acceptable to state that there are ongoing discussions. The comment from Highways England states that this development will have significant impact on the strategic road network. It then goes on to say, translated into laymans terms, when you have sufficient detailed information come and talk to us. At this stage of the Local Plan submission process there should at least be a statement of Common Ground with Highways England setting out the required junction improvements, timescales and funding.

### Conclusion

Empingham Parish Council consider the Transport Assessment supporting the proposed Local Development Plan at the Regulation 18 stage to be lacking in content and evidence to an extent that renders the Plan unsound.

The information supporting Regulation 19 pre submission, is still inadequate in the ways we set out above. In particular the impact on the strategic road network and the A606/A1 junctions is entirely missing.

In reality the site is destined to be a commuter village with a near total dependency on car travel.

The disruption to the County's rural road network will be intolerable during a twenty year construction period.

Mitigation measures to make the Plan sound

EPC does not believe that given the nature and location of this site and its impact on the rural surrounding road network, there are mitigation measures which could be introduced to make the Plan sound. There are other locations for development identified in the 2017 version of the Plan which are far more sustainable.

At the very least the Plan should be paused until the technical detail, especially the A606/A1 issue can be challenged. Similarly with the other critical junctions requiring improvement.