

Regeneration & Environment

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Programme Officer – Carmel Edwards
Sent via e-mail: programmeofficer@carmeledwards.com

Dear Sir / Madam

Rotherham MBC representation to the Bassetlaw Local Plan Matters, Issues and Questions

The Council submitted comments on 21 June 2022 in relation to the Bassetlaw Local Plan (Publication version second addendum - May 2022). Rotherham Metropolitan Council and Bassetlaw District Council have not fully resolved a Statement of Common Ground at the date of this written representation, although discussions are ongoing.

Please accept this letter as the formal representation from Rotherham Metropolitan Borough Council on the Matters, Issues and Questions raised by the Inspector examining the Bassetlaw Local Plan 2020-2037.

The relevant matters and questions are reiterated in the text boxes.

The Council does not consider it is necessary to participate in the examination hearing sessions.

Yours sincerely,

Winsze Lam
Planning Policy Officer
Planning, Regeneration & Transportation Service

Matter 3 – Employment Land (Policies ST7, 9, ST10 and ST11)

Issue 3 – Are the provisions of the plan in relation to the provision of employment land justified and consistent with national policy? Would the allocations be developable, deliverable and otherwise soundly based?

3.3 In relation to strategic employment needs:

- a) Is the allocation of 119ha at Apleyhead, in addition to land identified for “General and Larger Unit Employment Sites” justified and consistent with national policy?
- b) What factors led to its allocation? Is it based on up-to-date evidence?
- c) Has the allocation had appropriate regard to the potential wider strategic impact of the development?

3.4 Are the requirements of policies ST7 and Policy 9 clear, and would the criteria identified to assess proposals on these sites be likely to be effective? In particular...:

- b) Is there sufficient evidence to demonstrate that the site can be implemented and that all necessary infrastructure and mitigation measures required to support it are achievable and can be delivered?

Matter 5 – The Housing Requirement

Issue 5 – Is the identified housing requirement in Policy ST1, justified and consistent with national policy?

5.2 Is the housing requirement of 10,476 homes during the 2020-2038 period (policy ST1) and the proposed uplift above Local Housing Need (LHN), to a figure of 582 dwellings per annum (dpa), justified by the Council’s evidence? Are the assumptions of the 2019 Housing and Economic Development Needs Assessment and Addenda (SS-010, SS-007 and SS-024) soundly based, particularly in relation to...:

- b) Forecasts for economic growth;
- c) Alignment of jobs and workers; and
- d) Assumptions of housing requirements arising from economic growth.

Rotherham MBC has concerns regarding the amount of employment land allocated within the Local Plan, including the size of the Apleyhead strategic employment allocation (SEM001). This significant development allocation is proposed to meet growth targets above the current identified employment needs, set out in the Bassetlaw Local Plan.

It is anticipated that the proposed employment growth supported by the aspirational housing growth could have significant implications for communities in the South of Rotherham in terms of promoting commuting from Rotherham to Bassetlaw with the associated implications for increased traffic congestion and carbon emissions. There remains the potential for significant transportation impacts on the A57 within Rotherham Borough.

Matter 2 – Vision & Objectives, Spatial Strategy & Location of New Development, and the Site Selection Process (Policies ST1 and 2)

Issue 2 – Are the provisions of the plan in relation to the Spatial Strategy & Location of New Development justified and consistent with national policy?

2.6 Have the sites allocated for development in the plan been appraised and selected in comparison with possible alternatives using a robust and objective process?

2.9 Do the vision and objectives of the plan adequately address matters of climate change and air quality?

Following declaration of a Climate Emergency, Rotherham Council and South Yorkshire MCA have adopted a target for borough- and county-wide carbon emissions to be at net zero by 2040.

Traffic impact at junctions and links along the A57 is a shared cross boundary/strategic issue, in respect of emissions (in particular of carbon dioxide), community severance and congestion. Further work will need to be undertaken to understand all impacts arising, including at a regional level, to ensure traffic emissions are reduced (and certainly not increased) to enable the relevant targets in each administrative area to be achieved, and that the Bassetlaw Local Plan should, as a minimum, not cause an increase in total emissions of carbon that would result in the achievement of net zero becoming more challenging, regardless of the territory to which these are ascribed.

Any impacts on Rotherham's network (especially but not only with respect to the impact of increased carbon emissions) should be mitigated so the effect of the Bassetlaw Local Plan is at least neutral relative to baseline.

Matter 13 – Transport and Connectivity

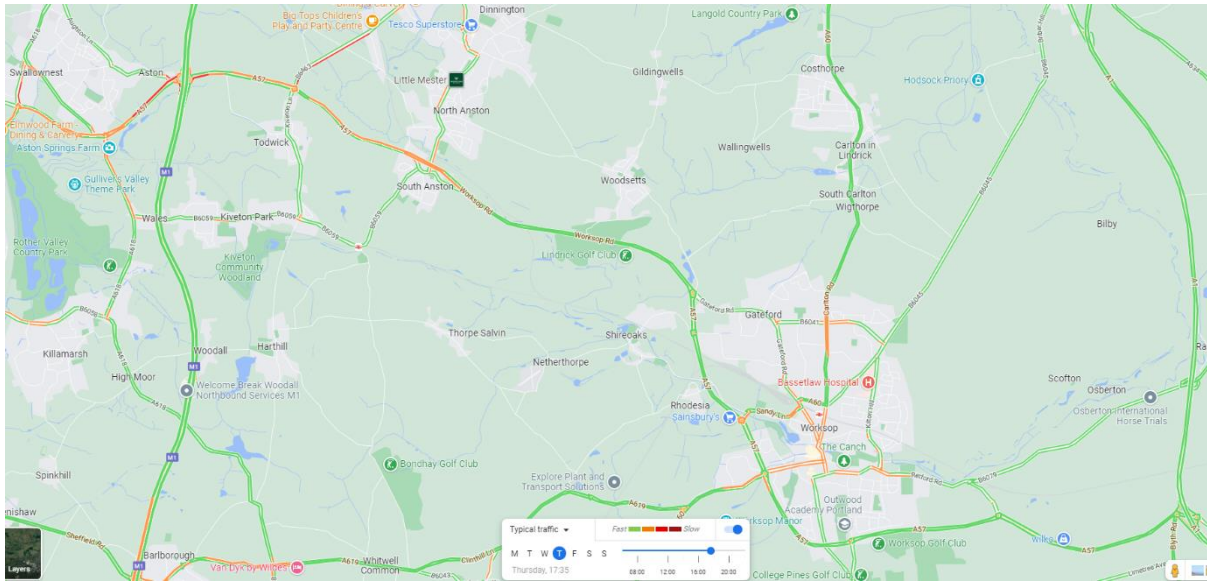
Issue 13 – Does the Plan set out a positively prepared strategy and policies for transport and connectivity which is justified, effective and consistent with national policy?

13.1 a) Is there robust evidence to demonstrate that the likely significant impacts on the road network arising from the development proposed in the Plan have been adequately assessed. Is there robust evidence that these can be effectively mitigated to an acceptable degree and that, if required, such mitigation can be delivered?

The Council is concerned that the traffic impact of the development on the A57 between the Rotherham Borough boundary, and M1 junction 31 has not been adequately considered. A significant part of the traffic generated will head to the M1 northbound through South Rotherham, with the Bassetlaw Transport Study (May 2022 version, document TI-017) forecasting an increase of 1,800 vehicles per day two-way AADT as a consequence of the Bassetlaw Local Plan in 2038 on the A57 at the Rotherham boundary (Figure 18).

This represents an increase in traffic on the A57 in Rotherham of 10% over observed 2019 levels before background growth and committed development are considered. Despite this forecast impact, no assessment appears to have been made within the published Bassetlaw Transport Study of any impact to any link or junction within Rotherham, nor on any community in the Borough, beyond the point at which the A57 crosses the boundary. Moreover, proposed highway improvements within Bassetlaw could be expected to result in further additional traffic resulting from induced and/or reassigned traffic in response to the additional capacity proposed; this does not appear to have been assessed within the published Bassetlaw Transport Study.

The route is already congested in peak hours at Ryton Crossroads, Red Lion Roundabout and at M1 junction 31, and creates considerable community severance at South Anston. Additional traffic, especially at the scale forecast by the Bassetlaw Transport Study, would be highly likely to require some form of mitigation to be put in place, to address congestion and community severance. Logistics use would generate more than two-way daily traffic for employees and encouragement of the use of sustainable transport alone is unlikely to prove adequate.



Typical weekday PM peak traffic conditions on and around the A57 in Rotherham and Bassetlaw. (Google Maps, taken 26 Oct 2022)

In addition to congestion and severance impacts associated with the forecast considerable increase in traffic on the A57 in Rotherham, this can also be expected to result in a considerable increase in emissions of carbon and other air pollutants, contrary to carbon budgets set out in the Climate Change Act as well as Borough and County targets to achieve net zero carbon emissions no later than 2040.

Therefore, to understand the impacts arising from significant development within Bassetlaw administrative area, on the Rotherham administrative area, a robust assessment of congestion, severance and emissions impacts on the A57 in Rotherham is required. This will most likely identify some severe adverse impacts on the highway network and communities in Rotherham, to which mitigation is essential.

The Local Plan will, therefore, need to include an evidenced, framework or project plan for mitigation along the A57. This will need to set out the likely trigger points for improvements, to mitigate the impacts of these development proposals within Rotherham Metropolitan Borough. Future work should also ensure that the proposed Apleyhead strategic employment site allocation does not generate adverse impacts on the Rotherham transport network or encourage out-commuting of the workforce from within Rotherham MBC or lead to significantly greater negative impacts on national or local environment related targets.