## **Regeneration & Environment**

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#### **07 December 2022**

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

Dear Ms Carmel.

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

The Council submitted a written representation to the Inspector's MIQs on 4 November 2022 and have agreed two Statements of Common Ground with Bassetlaw District Council, signed on 21 November 2022.

Bassetlaw District Council (BDC) provided on 30 November to RMBC two documents, providing new information in respect of trip generation and assignment associated with the proposed Apleyhead Employment Allocation:

- Bassetlaw Transport Study Addendum (A57 Link Capacity Review)
- Bassetlaw Transport Study Addendum (SRN Technical Note)

Please accept this letter as an addendum to 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.

This addendum should be read alongside Rotherham Metropolitan Borough Council's (RMBC) representation of 4 November 2022 and sets out where the additional information does and does not impact on RMBC's representation.

The Council acknowledges the hearing sessions for Matters 13 and 14 have moved to January, we do not consider it is necessary to participate in the examination hearing sessions.

Yours sincerely,

Planning Policy Officer
Planning, Regeneration & Transportation Service



#### Forecast trip generation & assignment

Whilst RMBC accepts that the trip rates forecast for the Apleyhead site are reasonable for the development proposed to be delivered by the site promoter within the Local Plan period, RMBC notes that the development quanta are considerably less than that allowed for in the proposed Local Plan.

Therefore, RMBC considers the revised trip generation should only be considered in assessment of the proposed Local Plan if that plan is revised to reflect reduced development quanta during the plan period.

#### Impact on traffic volumes on the A57 in Rotherham

Notwithstanding the lesser level of development reflected in the two new Transport Study addenda, it remains the case that the Local Plan, even if development at Apleyhead is constrained to that reflected in the addenda, is expected to result in a considerable increase in traffic on the A57.

Regrettably, the scope of modelling undertaken in the two addenda is not sufficient to determine the impact of the reduced development quanta on Rotherham's network, relative to that identified in the May 2022 iteration of the Bassetlaw Transport Study.

In the case the Local Plan is revised to constrain development quanta at the Apleyhead site, the strategic modelling in the Bassetlaw Transport Study (May 2022 issue) should be updated to reflect this and provide a view as to the cumulative impact of the whole plan on traffic volumes entering Rotherham.

However, based on information available it can be determined that a material impact on Rotherham's network is highly probable: –

- The reduced development at Apleyhead is still forecast to generate 323
   PCU/hr in busiest peak at the westernmost assessed point on A57 (Appendix D). Whilst not all of this traffic can be expected to reach Rotherham, this figure does not include for trips generated by Local Plan sites other than that at Apleyhead; and,
- Even if, for the sake of argument, the reduction in peak hour trip generation identified as a consequence of reduced development quanta is applied to the entirety of Local Plan additional trips forecast in the May 2022 Bassetlaw Transport Study (i.e. Figure 18), this would still amount to an increase in traffic on the A57 at the Borough boundary of 720 900 PCU / day AADT. (This is near certainly a significant underestimate of impact of the plan as there is no proposal to reduce development quanta or trip generation at sites other than Apleyhead).



Whilst the impact of Apleyhead site on traffic volumes on the A57 in Rotherham may be expected to be reduced by the proposed reduced development quanta, there is no evidence to suggest this reduction is so significant as to address RMBC's concerns in respect of capacity, community severance and emissions on the A57 in Rotherham, nor the need for further assessment of and mitigation for these impacts.

The information that is available suggests it is highly probable the increase in traffic volumes in Rotherham associated with the Bassetlaw Local Plan remain so significant to require further assessment and mitigation.

RMBC does have a concern that trip assignments for HGVs (other than in the immediate vicinity of the site access) and for LGVs are based upon travel to work data, which may not reflect road freight. This is implicitly acknowledged by BDC, in their preparation of an HGV specific trip distribution within the immediate vicinity of the Apleyhead site following discussions with Nottinghamshire County Council.

We would expect a far greater proportion of HGV and LGV trips generated by Apleyhead would continue through Rotherham to the M1, and far fewer sunk/sourced in residential parts of western Worksop, than would be the case for passenger traffic.

Mode specific trip distributions should be prepared for HGVs and LGVs, to ensure movements through Rotherham to the M1 and their consequential impacts are robustly and accurately assessed.

### Implications for congestion, severance and emissions in Rotherham

Whilst the forecasts of reduced traffic growth associated with the Apleyhead site would be welcome once reflected in the proposed Local Plan, the residual Local Plan traffic generation in Rotherham remains a concern.

Whilst we broadly do not have contention with Bassetlaw's finding that the link that crosses the boundary into Rotherham is likely to remain within capacity, this does not obviate concerns in respect of junction capacity within Rotherham at Ryton Crossroads, Red Lion Roundabout and M1 junction 31. Nor does it obviate concerns in respect of community severance at South Anston, nor of environmental impacts particularly in respect of compatibility with Borough and South Yorkshire targets to achieve net zero carbon emissions by 2040. Noting no evidence is provided to quantify the impact of reduced trips from Apleyhead on the A57 into Rotherham, our best guess (above) indicates Local Plan growth will remain many times greater than the 100 trips per day threshold typically used for scoping Transport Assessment.



Any reduction in traffic in Rotherham generated by the Bassetlaw Local Plan is welcome and may render mitigating for remaining traffic generation more straightforward. Notwithstanding this, RMBC considers the traffic growth on the A57 associated with the Bassetlaw Plan is still likely to present unacceptable impacts on junction capacity, community severance and emissions (in particular of carbon) in the Borough.

The new evidence does not suggest traffic growth in Rotherham associated will be Bassetlaw Local Plan will be sufficiently reduced to avoid a Transport Assessment of impacts on the A57 in Rotherham.

Whilst the scale and scope of these may be reduced, it is not anticipated that residual Bassetlaw Local Plan traffic growth in Rotherham can be accommodated without mitigation, in respect of junction capacity, community severance and emissions (particularly of carbon). An assessment of impacts within Rotherham beyond the link that crosses the borough boundary remains necessary.