Dear Rushcliffe planning policy team

Please find attached

1. The Notts CBT response
2. Our earlier response to the Mott Mac Donald report on the Poacher Line (referred to in the Local Plan response and to be rad alongside it)

Kind regards

Bettina Lange
Response from Nottinghamshire Campaign for Better Transport

28th June 2018

It is our view that the Plan as published is **not sound** because

A) its policies in relation to transport and transport accessibility conflict with national and with other Rushcliffe Local Plan policies and objectives

B) the Local Plan Part 2 Publication Version does not provide sufficient evidence in relation to transport and transport accessibility that it will be possible to implement the Plan in the plan period

C) the Plan will have an adverse impact on older people and people without access to a car due to poor access by public transport to and from the proposed allocations in some of the villages.

1. Our Case

The National Planning Policy Framework requires Local Planning Authorities to prioritize sustainable transport, in particular at 4. “Promoting Sustainable transport” and within this

“35. Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to …

give priority to pedestrian and cycle movements, and have access to high quality public transport facilities”.

The Rushcliffe Local Plan Part1 (Core Strategy) has among others the following objectives

“i. Environmentally responsible development addressing climate change: to reduce the causes of climate change and to minimise its impacts, through locating development where it can be highly accessible by sustainable transport …

...
Excellent transport systems and reducing the need to travel: to ensure access to jobs, leisure and services is improved in a sustainable way, reducing the need to travel especially by private car”.

Local Plan Part 1 (Core Strategy) also includes these relevant sections in its policies

“POLICY 14: MANAGING TRAVEL DEMAND

1. The need to travel, especially by private car, will be reduced by securing new developments of appropriate scale in the most accessible locations following the Spatial Strategy in Policy 3, in combination with the delivery of sustainable transport networks to serve these developments.

2. The priority for new development is selecting sites already, or which can be made, accessible by walking, cycling and public transport. Where accessibility deficiencies do exist these will need to be fully addressed.”

“POLICY 15: TRANSPORT INFRASTRUCTURE PRIORITIES

1. Where new development gives rise to the need for additional transport infrastructure, it should be prioritised in accordance with the delivery of the Spatial Strategy in Policy 3, the principles of travel demand management in Policy 14 and the priorities of the Nottingham and Nottinghamshire Local Transport Plan. The details and certainty of funding and timing are set out within the Infrastructure Delivery Plan.

2. New development, singly or in combination with other proposed development, must include a sufficient package of measures to ensure that journeys by non-private car modes are encouraged, and that residual car trips will not severely impact on the wider transport system in terms of its effective operation.”

The Rushcliffe Local Plan Part 2 will either make it significantly more difficult to implement these policies or does not provide clarity as to the extent to which it will be possible to implement them. We provide evidence below from

the Rushcliffe Local Plan Part 2: Land and Planning Policies
Infrastructure Delivery Plan May 2018

the Local Plan Part 2: Land and Planning Policies Equalities Impact Assessment
Publication Draft April 2018

the Local Plan Part 2: Land and Planning Policies Sustainability Appraisal Report
Publication Draft Main report April 2018

to demonstrate this.
2. Rushcliffe Local Plan Part 2: Land and Planning Policies
Infrastructure Delivery Plan May 2018 and related

The IDP concludes that even assuming all the transport measures detailed in it are funded and implemented, the Local Plan Part 2 will be detrimental to the operation of the road networks:

“4.4 The Greater Nottingham Infrastructure Delivery Plan has assessed the cumulative impact of the Greater Nottingham Core Strategies on the strategic highway network using the Greater Nottingham multi-modal Transport Model (GNTM). In summary, the modelling results indicated that subject to implementation of Smarter Choices and public transport measures the growth set out in the adopted Core Strategies can be delivered without significant detriment to the operation of the transport networks, and subject to the delivery of a package of measures to improve A52(T) junctions between A6005 and A46(T) Bingham. In addition, land to the East of Gamston/North of Tollerton will need to be supported by bus priority measures and other improvements related to bus services to serve it, which may also include a park and ride site.” [emphasis added]

Even if judged to be not “significant”, the detriment to the road network is conceded. It is worth bearing in mind here that government have not provided guidance on the meaning of ‘significant’ and there is no agreed, or indeed any, definition of the term.

The IPD reports (at 4.6 – 4.8) that funding has not been secured for the A52/A606 changes or the proposed Park&Ride site and that the former is expected to be found from developer contributions, while it is proposed to use the Rushcliffe CIL as the source of funding for the latter. This leaves a great deal of uncertainty around the delivery of these schemes. It takes an average of 2 years to reach agreement on a CIL schedule so that this will not become a potential source of funding until 2019/20 at the earliest.

It reports that Highways England are concerned that the delivery of the non-strategic housing sites will have an impact on the functioning of the strategic road network and that it regards the implementation of the A52/A606 package as essential (4.10 – 4.12). 4.13 and 4.14 reports that Notts County Council recommends that developers contribute to the funding for the strategic highway package. Except through CIL, this seems a tall order given that (revised) national planning practice guidance is clear that developers should not be expected to contribute to infrastructure or services not directly arising form their development. This situation suggests years of negotiation before any funding is secured but quite possibly after houses have been built at the non-strategic allocations. An additional constraint is the fact that CIL regulations do not allow the ‘pooling’ of S106 contributions from more than 5 sites.

The IDP assessment of bus service patterns concludes

“4.18. It is considered that the level of services on offer across those settlements where housing allocations are proposed provide a level of service that would normally be expected to serve the size of the settlements in question. Some development may provide additional passengers to support some of the more rural services. There are no overall or site specific requirements for improvements to bus services identified at this stage. There
may be requirements that arise as result from site specific transport assessments where they accompany planning applications.”

This leaves any improvements to bus (or other public transport) services to negotiations in relation to particular sites or planning applications. It would be surprising if improvements were not needed given that many of the sites in or near villages would have no public transport in the evenings or on Sundays so that it would not be possible for new residents to lead a normal life without access to a car.

Any contributions to bus services may or may not materialise as part of S106 agreements. For the non-strategic sites it is in fact not very likely that they will due to the comparatively small number of houses, giving developers scope to use viability assessments to negotiate down S106 agreements and planning obligations. So 4.18 amounts to the conclusion that many of the housing sites (for example the Shelford Road sites in Radcliffe, the East Bridgford sites, the Cropwell Bishop sites) are allocated on the assumption that only those with access to a car and willing to drive (at least in the evening and at the weekend) will be eligible to live there.

As the IDP reports at 4.21, the proposed (bus-based) Gamston Park& Ride is included in the February 2017 CIL Preliminary Draft Regulation 123 List whereas rail enhancements are not

“ 4.21. Network Rail, in response to the Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule consultation, has identified that it would support enhancements to rail infrastructure along the Nottingham to Grantham Line as part of the CIL regulation 123 list. It has not suggested any more specific requirements for inclusion within Local Plan Part 2.”

Given that rail has the potential to enhance the public transport offer in the A52 corridor substantially, this is disappointingly vague. Nottinghamshire Campaign for Better Transport set out in detail the potential for rail enhancements along the corridor in our response to the Mott Mac Donald report

“Poacher Line Strategic Outline Business Case 15 May 2017”

(commissioned by Gedling Borough Council). Our response is attached.

The site selection method explained at IDP 4.2 proceeded in two stages, assessing first whether a site “could” be allocated and second whether it “should”. The first tier assessment included highway access, whereas sustainable transport and accessibility was included in the second tier assessments. In this way the methodology chosen structurally prevented the conclusion that sustainable transport consideration may be ‘show stoppers’. This seems arbitrary and less than objective. The site schedules (Appendix 1) in the IDP leave all accessibility and sustainable transport requirements and their funding to be decided in future planning negotiations such as around S106 agreements. As a consequence, it is not possible to make a judgment whether on this point Local Plan Part 2 is in conformity with, or conflicts with, national and Rushcliffe Core Strategy policies prioritising sustainable transport.

The Local Plan Part 2 itself does not provide any more confidence regarding its relation to sustainable transport and accessibility policies. An opportunity has been missed to steer the determination of planning applications in the direction of sustainable transport. We argued in our November 2017 response to Local Plan Part 2 (answer to question 5) that a meaningful planning obligations framework together with a funding package should be an integral part of the Local Plan Part 2 process:
“IF the sites are allocated, it will be critical that sustainable transport options are planned in at Local Plan stage rather than left for negotiation with applicants at planning application stage. Early and ongoing cooperation between Rushcliffe and Nottinghamshire County Council, the support of the County Council for sustainable transport packages, and assessing and addressing the cumulative transport impact of developments along, or affecting, the A52 corridor will be essential. We understand that Nottinghamshire County Council has the facility (through a dedicated post) to monitor cumulative impacts and would urge that this is made use of throughout. It is also our view that the Local Plan Part 2 should set out clearly what will be expected of applicants and that this should include the mechanisms to be used in order to secure the necessary funding for sustainable transport measures such as new or enhanced bus services including feeder services to railway stations. Section 106 agreements are one such mechanism. The larger sites will have to be served by a direct bus service to minimize traffic impact, and this should be also included in the Local Plan Part 2. “

All we are offered in the Publication version of Local Plan Part 2 is this disappointingly vague policy

“POLICY 43 PLANNING OBLIGATIONS THRESHOLD

Planning obligations may be sought from developments of more than 10 dwellings or 1,000 square metres or more gross floorspace for the provision, improvement or maintenance, where relevant, of the following infrastructure:

a) Health;
b) Community and sports facilities;
c) Green Infrastructure and recreational open space;
d) Biodiversity Mitigation and compensation;
e) Education; and
f) Highways, including sustainable transport measures.”


concludes that Policies 7 (Crowell Bishop), 8.1 and 8.2 (East Bridgford) and 10 (Sutton Bonnington) will disadvantage those without access to a car.

It is claimed in the site assessments (Appendix A) that the sites in Policies 5.2 and 5.3 (Radcliffe on Trent) are accessible to key services in the village by either walking or the existing bus service. This is not convincing as the bus service does not run in the evenings or on Sundays and is in any case financially precarious for the operator, and the sites are on a hill making walking difficult for many.

The example of the Radcliffe sites illustrates a wider issue: Rushcliffe has a higher than national average of residents over 60 (see 3.3 in the Equalities Impact Assessment), and sustainable public transport is vital for this (increasing) section of the population.
We commented in detail on the issues in Radcliffe in our April 2018 response to the Shelford Road planning application (13/02329/OUT). Our comments are relevant to the Local Plan Part 2 process but will not as a matter of course be included in the Examination documents. We therefore reproduce the text of our letter in full below in the Appendix and also request that the letter is added to the Examination documents.


concludes that the Local Plan Part 2 will cumulatively have a “minor negative” impact on transport objectives (7.45, p.130) but this obscures the variation in impacts of different allocations. These become more visible in the site-specific assessments. The SA concludes that all or the majority of sites at or near the following villages will have a “negative” impact on the transport objective due to lack of (good) public transport and poor accessibility:

East Bridgford ((6.102, p.87)
Sutton Bonnington (6.118, p.95)
Crowell Bishop (6.94, p.83)
Radcliffe on Trent (6.55, p.69).

Appendix : Nottinghamshire Campaign for Better Transport Response to Planning Application 13/02329/OUT

“9th April 2018
Planning Application 13/02329/OUT
Shelford Road, Radcliffe on Trent

Nottingham Campaign for Better Transport (NBT) objects to this planning application because it

1. Conflicts with National Planning Policy
2. Conflicts with Rushcliffe Core Strategy.

1. National Planning Policy

The application conflicts with the NPPF in the following ways

1.1 It does not manage development to “make the fullest possible use of public transport, walking and cycling” and reduce pollution as required in paragraph 17. Instead, it makes access to employment and the City of Nottingham more convenient for those using their cars.

1.2 It will increase CO2 emissions due to an increase in car traffic and therefore does not fulfill the environmental role planning has to move to a low carbon economy as required by paragraphs 7 and 17.
2. Rushcliffe Core Strategy

2.1 The proposed development does not meet Policies 1/2/14. The development is almost totally based on highway enhancements and the assumption the majority of citizens will drive. This conflicts with so many policies including Air Quality, Climate Change, Health and Environmental Protection.

Detailed Comment

We cover below the transport issues with this application.

Bus Service Contributions

NBT is concerned with the data provided on bus services. There are references to the ‘Radcliffe Line’, but that service has not existed for some years and the Residential Travel Plan (2013) is based on outdated bus service levels. The current ‘Villager’ service already survives on S106 money and there has been a public meeting in Radcliffe to discuss the future of this loss-making route, which is under threat of being axed completely. Far from an enhanced bus service from the S106 money of this development, by the time the houses are built, there may be no buses at all. This is partially recognized by the response from Nottinghamshire County Council. The projections on future ridership are suspect, unless there are interventions to ensure modal shift away from the private car. This planning application is devoid of such interventions.

NBT considers all of the data provided on bus services to be not fit purpose for this application and an accurate assessment of future bus service requirements and how that is funded should be provided.

Rail

This is an exceedingly difficult area. The much-underused Nottingham – Grantham railway line and the station at Radcliffe not very far from the development is completely ignored. Such a resource in any developed country across Western Europe would be seen as the solution. It is damming that in England it is ignored.

Discussions NBT has had with local government officers suggest that although rail is a solution, the fragmented, privatized railway is in ‘the too difficult box’.

NBT cannot just accept this. What is in essence National Government policy cannot be allowed to impact so catastrophically at the local level and local government should say this.

NBT is also concerned at governmental responses that point to the vast sums being directed to Toton and the HS2 station. This does not help someone living in Radcliffe and working in Nottingham and we question if HS2 is now part of the problem regarding rail investment away from Toton.

NBT fully understands these comments may be outside the specifics of this planning application, but they are in accordance with NPPF and other policies on Climate Change and Environmental Protection and need due consideration.

Main Road/Nottingham Road

No consideration has been made on the impact to the west of Radcliffe centre, where
there will be greatly increased levels of road traffic along unsuitable roads. The road near the Chestnut pub has two 90-degree bends with a third lesser bend. There are two bus stops on this section. All bus passengers have to cross the road in one direction at least and this is already highly dangerous with no view of traffic approaching around the bends. The traffic travels at inappropriate speeds, not necessarily breaking the law, but with total disregard for the mix of curvature and possible pedestrians crossing around the bend. There is a high density of elderly living in this area who depend on the bus. A simple zebra crossing would be of limited use, as that is hidden around the bend, although would ease the situation.

There appears to be an assumption that traffic would prefer to travel via New Road and Cropwell Road to the A52. NBT questions this and much traffic joins the A52 at the RSPCA junction.

**Street Parking**

Already, commuters use residential streets as informal park & ride sites, such as in Bingham and West Bridgford. It is recognized that locally, step by step, new restrictions are attempting to control this, but pushing yet more traffic onto the A52 towards Nottingham will only exacerbate the situation.

Such street parking impacts seriously on the efficient operation of bus services due to the congestion caused.

**Process**

Outside of this planning application, but important for the democratic process, NBT has constantly been getting online the response, ‘Document Unavailable This document is unavailable for viewing at this time.’ This has made responding exceedingly difficult as we cannot see some of the documents.

David Thornhill
Chair – Nottinghamshire Campaign for Better Transport"
Poacher Line Strategic Outline Business Case

Comments from Nottinghamshire Better Transport (NBT).

3.3.1.2/3 (and other paragraphs, where history feeds in to where we are today)

This does not give the full historic picture. The decimation of stopping services was partly decreed by DfT in their specification for the new (from Central Trains to East Midlands Trains) franchise. The DfT has never explained why it did this. NBT believes this is a unique situation where, in essence, the local train service was ‘stolen’; NBT is unaware of this happening on any other line in England.

The high usage of Bottesford today needs noting, as the DfT specification decimated stopping services to all stations (except Bingham) and it was only through a vigorous campaign by commuters at both Bottesford and Aslockton that some semblance of a usable train service was saved, at the eleventh hour, before the revised timetable was introduced. At that time Radcliffe on Trent did nothing, and services to there were reduced.

Going back to the days of British Rail and a regular service there was considerable long distance travel via Grantham, with good connections on/off the ECML. Central Trains immediately set about breaking the Grantham connections and to this day, connections at Grantham are often missed by one or two minutes. This latter point seems not to be covered in the current report and I question if high value travel via Grantham has been considered at all.

NBT can offer no evidence, but it is thought that much data provided by Central Trains to DfT was wildly inaccurate and DfT decisions were perhaps based on this? Going back to the last days of the Central Trains franchise, the reliability of the train service was diabolical and NBT recognizes there was a downward trend in ridership, but commuters had no certainty that their train, day after day, would ever turn up.

NBT must commend EMT at this point in turning around a mismanaged franchise into the high-quality service we see today. But we still do not have a meaningful local train service.

We recognise Mott MacDonald is using the methodology of today, but we have 87 pages of data justifying the restoration of trains that, as I say above, were ‘stolen’. NBT finds it depressing this process is necessary, although we appreciate we are arguing for a step change in quality, rather than just stopping the Skegness service at every station.

3.3.1.1

NBT questions the accuracy of the data presented here, especially the recent
enhancements to services. The two trains per hour on the Nottingham – Newark line for example. Sunday services have been enhanced, although some long-established Sunday calls have been missed, such as at Aslockton.

The comparator of the Newark line, parallel to the Poacher Line, is ignored throughout. The step change in service doubled the frequency between Nottingham and Newark. This delivered a stopping service to Newark plus a fast/semi-fast to Newark and into Lincolnshire. In essence, this is identical to the wishes of the Poacher Line – a stopping service to Grantham plus a fast/semi-fast service to Grantham and into Lincolnshire.

3.3.1.4

Grantham already has a north facing bay and the Poacher Line doesn’t connect to ECML to the north (freight trains and possibly regulated VTEC trains do use this connection) and it is not clear what was meant here.

Not mentioned is the severely restricted speed imposed over the approach to Grantham from some distance out, coupled to the section of single track that is mentioned. The Rules of the Plan (LN195) here are complex and NBT questions if any review has been made on how the modern railway functions around Grantham. Certainly, this is a very poorly designed bit of railway and addressing this could transform capacity.

The long sections of single track east of Grantham are not mentioned. These severely limit timetabling flexibility between Grantham and Skegness.

3.3.1.5

NBT questions, ‘In reality any additional services on the Poacher Line between Nottingham and Grantham would have to be integrated around other services, meaning that the resulting timetable would have to fit within the remaining paths once these have been established’.

This perpetuates the current mentality, where we are left with a few ‘crumbs’ as there are no resources or the inclination to offer anything better. We believe the citizens of, say, Radcliffe should be treated equally with those in other communities.

3.5.5

The statement from Aslockton Parish Council is contentious and NBT believes has no place in the report. One concludes councilors do not want to enhance amenities for existing residents (because they all drive everywhere perhaps?). To combat climate change, air quality, social exclusion and so on, modal shift needs to be delivered. Certain citizens of Aslockton may have their private views on this, but should they be aired in a document in the public domain?

Of course, turning the Aslockton argument around, that is new housing and the need for good public transport go hand in hand, then to accommodate the new housing proposed all along the A52 corridor, rail services will have to be improved.

Aslockton does have a Sunday service, limited, but trains do stop.

5.2.2
The suggestion of a non-stop service from Derby is curious. The report has no reference to the growing employment zone of Beeston. NBT argues that any new service should be cross-Nottingham, which may or may not be towards Derby, but if it is, it needs to provide connectivity to at least Beeston.

Extreme caution needs to be taken on the blanket removal of local stops on the Norwich – Liverpool service and NBT is not supportive. The trains provide a cost-effective way of delivering peak time frequency. There is also an example of stops to plug connectivity gaps from Grantham, created by the service from Skegness avoiding Grantham.

Other Considerations

NBT will not comment on the modelling, other than to say that there is much academic debate on the accuracy of the processes dictated by DfT with the value of rail often understated. We will underline areas that have not been well covered.

- There is a focus on commuter travel into Nottingham. The high value long distance travel should not be ignored. We already know the short distance commuting is problematic due to the poor timetables, mainly in the evening. This is doubly so for longer distance travel, where connectivity to the local stations through the mid/late evening does not exist at all.
- The seasonal traffic to Skegness is a challenge to the rail industry. Not mentioned are the long trains used through the summer, yet many local stations can only accommodate very short trains. This can be managed by selective door opening but is an undesirable way of running the railway. There is also the question of crush loading so passengers at intermediate stops cannot board. In other words, trying to deliver a local service between Nottingham and Grantham via the Skegness trains is dysfunctional and there has to be a separation between these flows, with fast services for Lincolnshire and a stopping service between Nottingham and Grantham.
- The subsidy for the options appears to be in line with those for the enhanced Nottingham – Newark line. Again, this work is ignored in the report.
- The political structure of the area is mentioned, but NBT believes politics has got us to where we are today, rather than any consideration of need. Nottingham – Newark is totally within Nottinghamshire, whilst Nottingham – Grantham runs through three counties. There has been immense political support for Nottingham – Newark, with debates in Parliament (e.g. https://hansard.parliament.uk/Commons/2014-01-27/debates/14012735000002/NottinghamToLincolnRailwayLine). Alas for Nottingham – Grantham there has been political indifference.
- The document is light on walking/cycling to/from stations and is curiously focussed on driving to the station, which is becoming inconsistent with new funding streams and developing strategies.
- The latter point is true of bus – train connectivity too.
- Probably outside of the report’s remit, but the political structures do not help rail. The planning process and Section 106 money is in the hands of the Districts, yet the Transport Authorities are the County Councils or Unitary Authorities. Delivering rail locally might be considered ‘too difficult’ therefore and the easy option of a few buses is taken forward. Or it is pushed upwards to the LEPs to worry about funding if not part of the new franchise. If the A52 corridor is to see the levels of housing growth dictated, the big picture must be viewed and rail part of a multi-mode ideal solution. At least Gedling and other stakeholders in funding the Mott MacDonald work are attempting to look at the wider issues.
I should have added that we would like to take part in the Examination hearings.

Bettina Lange

Dear Rushcliffe planning policy team

Please find attached

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2. Our earlier response to the Mott Mac Donald report on the Poacher Line (referred to in the Local Plan response and to be rad alongside it)

Kind regards

Bettina Lange