

**HAYLINK LIMITED –
FORMER HMS GANGES,
SHOTLEY GATE, SUFFOLK**

**Proof of Evidence of Simon Blinkhorne BSc MCIT MILT MIHT
On behalf of the Peninsula Parishes Alliance (PPA3)
(CORE DOCUMENT CD77)**

**PINS: APP/D3505/V/05/1185675
LPA: B/03/01085/OUT**

**Project No. 05-069
January 2006**

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REV	ISSUE PURPOSE	AUTHOR	CHECKED	REVIEWED	APPROVED	DATE
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1.0 QUALIFICATIONS AND EXPERIENCE

1.1 My name is Simon Blinkhorne. I am a Director of Odyssey Consulting Engineers Limited dealing primarily with the highway and transportation implications of development. I am responsible for highways, traffic, transportation and sustainable travel assessments undertaken on behalf of Clients.

1.2 Odyssey Consulting Engineers (OCE) was formed in June 2005 to provide traffic, transportation and engineering advice to the Development Industry. The Company specialises in preparing site feasibility reports, travel impact assessments, provision of expert evidence as well as detailed design of development infrastructure projects.

1.3 Prior to the formation of Odyssey Consulting Engineers I was employed by Buchanan Consulting Engineers from September 1989 to June 2005, which broadly offered the same level of consultancy advice as Odyssey.

1.4 I hold a Bachelor of Science (BSc) degree in Civil Engineering from the University of Leeds. I am a Member of the Chartered Institute of Transport (MCIT), the Institution of Highways and Transportation (MIHT) and the Institute of Logistics and Transport (MILT).

1.5 I have been employed in the field of highways and transportation planning and traffic engineering for the last 22 years and have extensive experience in both the private consultancy and public authority sectors. I have been involved in numerous Public Inquiries throughout this period, acting for a wide range of Clients and development types, both in the public private and public sector.

1.6 I have worked on numerous schemes involving residential development. I am familiar with the site and the surrounding highway network which I have visited in the preparation of this evidence.

2.0 INSTRUCTIONS

2.1 I was instructed by the Parishes of Shotley Peninsula in September 2004 to carry out a review of the Transport Assessment prepared by JMP Consulting on behalf of Haylink Ltd in support of the Planning Application for redevelopment of the HMS Ganges site. I was subsequently instructed by Dr Wendy Le-Las on behalf of the Peninsula Parishes Alliance in December 2005 to represent them on highways and transportation matters relating to the HMS Ganges case in respect of this Inquiry.

3.0 SCOPE OF EVIDENCE

3.1 My evidence deals with highways and transportation matters and specifically to the sustainability of the site in transport terms and link capacity on the B1456.

3.2 I shall refer to:

- National Transport Planning Policy Guidance as set out in PPG's 3, 7 & 13;
- The Suffolk Structure Plan 2001;
- Transport Policies of the Babergh Local Plan Alteration No. 2 Second Deposit Draft May 2003;
- The Borough Council's Committee Report as presented to the Development Committee on the 8th June 2005 together with the Committee's resolution;
- Babergh District Council's Statement of Case;
- The Transport Assessment prepared by JMP Consulting dated July 2004 on behalf of Haylink Ltd;
- The review of the JMP Transport Assessment as prepared by Buchanan Consulting Engineers dated November 2004;
- Statements made in the various ES / Sustainability documents prepared for Haylink Ltd; and
- Other relevant documentation.

3.3 My evidence demonstrates the following:

- The development site is in an unsustainable location both in terms of its accessibility by means of transport other than the private car and its accessibility to jobs, schools, shopping and other services as prescribed in PPG'3 and 13.
- That even if the bus services between the site and Ipswich Town Centre could be provided at an increased frequency and on acceptable terms, and the ferry service between Shotley, Harwich and Felixstowe improved, a large proportion of trips likely to be made to and from the development could still not realistically be achieved by modes of transport other than the private car.
- Based on a reasonable interpretation of link capacity assessment standards, the proposed development will, during the busiest periods of the day, result in critical sections of the B1456 operating beyond its theoretical capacity, which would lead to congestion, a deterioration of road safety conditions, increased conflict with other road users and a worsening of environmental conditions within village centres.

4.0 SUSTAINABILITY OF THE SITE IN TRANSPORT TERMS

Site Location

4.1 The location of the site in relation to Ipswich and the rest of the Shotley Peninsula is shown at Appendix SRB1. This plan shows the isolation of Shotley Gate in relation to surrounding built up areas, being some 16 kilometres from Ipswich, 11 kilometres from Holbrook and 6 kilometres from Chelmondiston. The location of the site is succinctly put by the Planning Authority in its report to Committee of the 8th June 2005. At paragraph 6.1 the Head of Planning (Control) states that *“the site lies at the end of a peninsula remote from any significant service or employment centre and access by land or water is not good. In short, it is not a sustainable location”*.

PPG3

4.2 Planning Policy Guidance PPG3 (Housing) states at paragraph 2 as one of its main objectives that *“Local Planning Authorities should:*

- *Create more sustainable patterns of development by building in ways which exploit and deliver accessibility by public transport to jobs, education and health facilities, shopping, leisure and local services;*
- *Seek to reduce car dependence by facilitating more walking and cycling, by improving linkages by public transport between housing, jobs, local services and local amenity and by planning for mixed use”*.

4.3 At paragraph 31 PPG requires Local Authorities, when deciding which sites to allocate for housing, to assess their potential and suitability for development against a number of criteria. These include:

- *“The location and accessibility of potential development sites to jobs, shops and services by modes other than the car, and the potential for improving such accessibility;*
- *The capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals) to absorb further development and cost of adding further infrastructure;”*

4.4 It will become clear from my evidence that this site is poorly located in terms of its accessibility to jobs, shops and services by modes of travel other than the private car and the potential for improving such accessibility is limited. Whilst accessibility to and from Ipswich by public transport is capable of being improved (albeit the long term feasibility of this is in my view questionable) I shall demonstrate that for a large proportion of trips undertaken by residents of the new development the use of public transport, walking and cycling is not a feasible option.

4.5 At paragraph 6.3 of the Council’s Committee Report consideration is given to the weight to be given to planning permission on the site for 404 retirement dwellings. It is understood that this permission was first granted in 1986 and the permission renewed in 1997 with a further decision on this made in 2000. At paragraph 6.7 of the Council’s Committee Report it is stated that *“the existence of a valid planning permission on part of the site for a retirement community of 404 dwellings is a material consideration.”* The report goes on to say *“I do not believe there is a significant likelihood of that planning permission now being implemented – it was initially sought in 1988 and had there been a realistic chance of that development proceeding then I consider it would have done so by now. To that extent it should not weigh heavily in the balance of this decision.”*

4.6 Provision for this view is contained in paragraph 40 of PPG3 which suggests that issues of sustainability mean that Local Planning Authorities should review thoroughly all applications to renew permissions, particularly by

comparison with available previously developed sites against criteria in paragraph 31 (as I refer to above) and in the light of the presumption in paragraph 32, as well as policies set out elsewhere in this guidance. They may as a result determine that some existing planning permissions no longer meet the requirements of current policy guidance and should not be renewed.

4.7 Transport policy has moved on enormously since in 1986 with the demise of 'predict and provide', and the advent of the Government's White Paper on Transport and Sustainable Transport Policies advocated at both a National and Local level. As such, I consider that it should not be automatically assumed that consent for the retirement community of 404 dwellings will remain in place indefinitely. As such, I concur with the Council's Committee Report that little weight should be given to this extant permission.

4.8 Paragraph 46 of PPG3 states that:

"to promote more sustainable residential environments, both within and outside existing urban areas, Local Planning Authorities should promote;

- *Development that is linked to public transport;*
- *Mixed use development;*
- *A green residential environment;*
- *Greater emphasis on quality and designing places for people;*
- *The most efficient use of land.*

4.9 It goes on to say at paragraph 47 that *"the Government places particular emphasis on the importance of integrating decisions on planning and transport in order to reduce the need for travel by car. Local Planning Authorities should therefore seek to exploit opportunities to locate large*

housing developments around major nodes along good quality public transport corridors (both existing and those with firm proposals for improvement in Local Transport Plans) and seek to ensure that all housing developments are accessible by a range of non-car modes. This applies to development both within and outside existing urban areas. Development proposals should be supported by a Transport Assessment as set out in PPG13; Transport.”

4.10 The above policy is very specific on the importance of integration between planning and transport. It is clear that the location of a proposed development is the key consideration in determining whether it can meet the requirements of Transport Policy. It is common sense that a development site located close to a major node along a good public transport corridor will be able to exploit the transport interchange facilities that that node offers, i.e. from bus to train or from bus to another bus. As such, the closer to a node a development site is, the greater the catchment area of the development in sustainable transport terms. The catchment of a development site which is remote from a major node, even if it is located on a public transport corridor, will clearly be diminished as the travel time associated with accessing the major node for the purposes of interchange will in many cases be increased so as to make a journey by non-car modes of transport unviable. I believe the proposed development at Shotley Gate, which is approximately 16 kilometres (10 miles) from Ipswich, to be a good example of this.

4.11 Paragraphs 69 to 71 of PPG3 deal with Rural Housing – Village Expansion and Infill. Paragraph 69 states that *“in terms of overall housing provision, only a limited amount of housing can be expected to be accommodated in expanding villages. Whilst occasionally a village could be the basis for a new settlement where, for example, the development accords with the policy of developing around major nodes in transport corridors, most proposals for additional housing will involve infill development or peripheral expansion.”*

4.12 It is evident that the proposed development is not located around a major node in a transport corridor, it therefore does not qualify as an

acceptable site within the context of the Rural Housing Guidance set out within the PPG.

PPS7

4.13 With regard to PPS7: Sustainable Development in Rural Areas (2004) I concur with the views of the Head of Planning as set out in the Council's Committee Report of the 8th June 2005. At paragraph 3.1.7 of that report the report quotes paragraph 3 of the PPS,

“away from larger urban areas, Planning Authorities should focus most new development in or near to Local Service Centres where employment, housing (including affordable housing) services and other facilities can be provided close together. This should help to ensure these facilities are served by public transport and provide improved opportunities for access by walking and cycling. These Centres (which might be a country town, a single village or a group of villages) should be identified in the development plan as the preferred location for such development”.

4.14 At paragraph 6.5 of the Committee Report it is acknowledged that Shotley lacks a variety of employment opportunities and good journey to work transport and has thus not been judged by Babergh District Council to be a sustainable village (in Policy HSO3). The appropriate scale, therefore, of residential development in Shotley is infilling or small groups within the built up area of the village. As such I am of the view that this development does not comply with the aims of sustainable development in rural areas as set out in PPS7.

PPG13

4.15 PPG13 deals with Transport (2001). The objectives of the guidance are set out within paragraph 4 which advocates,

“the integration of planning and transport at the national, regional, strategic and local level to:

- Promote more sustainable transport choices for both people and for moving freight;*
- Promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and*
- Reduce the need to travel, especially by car.”*

4.16 Paragraph 5 of PPG13 goes on to state that:

“this guidance sets out the circumstances where it is appropriate to change the emphasis and priorities in provision between different transport modes, in pursuit of wider Government objectives. The car will continue to have an important part to play and for some journeys, particularly in rural areas, it will remain the only real option for travel.”

4.17 Paragraph 6 of the PPG states that *“in order to deliver the objectives of this guidance when preparing development plans and considering planning applications, Local Authorities should:*

- Actively manage the pattern of urban growth to make the fullest use of public transport, and focus major generators of travel demand in city, town and district centres and near to major public transport interchanges;*
- Locate day to day facilities which need to be near their clients in local centres so that they are accessible by walking and cycling;*
- Accommodate housing principally within existing urban areas, planning for increased intensity of development for both housing*

and other uses at locations which are highly accessible by public transport, walking and cycling;

- *Ensure that developments comprising job, shopping, leisure and services offers a realistic choice of access by public transport, walking and cycling, recognising that this may be less achievable in some rural areas;*
- *In rural areas, locate most development for housing, jobs, shopping, leisure and services in Local Service Centres which are designated in the development plan to act as focal points for housing, transport and other services, and encourage better transport provision in the countryside;*
- *Ensure that strategies in the development and local transport plan complement each other and that consideration of development plan allocations and local transport investment priorities are closely linked;*
- *Use parking policies alongside other planning and transport measures to promote sustainable transport choices and reduce reliance on the car for work and other journeys;*
- *To give priority to people over ease of traffic movement and plan to provide more road space to pedestrians, cyclists and public transport in town centres, local neighbourhoods and other areas with a mixture of land uses;*
- *Ensure that the needs of disabled people – as pedestrians, public transport users and motorists – are taken into account in the implementation of planning policies and traffic management schemes, and in the design of individual developments”.*

4.18 Whilst paragraph 5 states that in rural areas the car will remain the only real option for travel, it is important to note that the guidance suggests that this should only be the case for “*some journeys*”. This comment is countered by the fifth bullet point of paragraph 6 which states that in considering planning applications in rural areas, local Authorities should locate most development for housing in local service centres which are designated in the Development Plan to act as focal points for transport and other services. It has been acknowledged by the Council that this is not a Local Service Centre. Furthermore, it is my view that the car will remain the only real option for travel to and from this development for the majority of journeys made.

4.19 In my view this development would do nothing to reduce the need to travel by car and indeed will encourage greater car journeys to be made with the consequent increase in emissions when compared with development located close to a major node along good quality public transport corridors. As such, I consider that the proposed development fails to meet the objectives as set out within PPG13.

4.20 Paragraphs 13 and 14 of PPG13 cross refer to PPG3 (Housing). Paragraph 13 urges the focus of additional housing to be existing towns and cities. It emphasises the requirement of local planning authorities to build in ways which exploit and deliver accessibility by public transport to jobs, education and health facilities, shopping, leisure and local services.

4.21 It also requires local authorities to place the needs of people before ease of traffic movement in designing the layout of residential developments. In this regard I concur with the criticism raised about the proposed development by the Head of Planning in his Committee Report. At paragraph 6.22 the report states that “*the B1456 has no continuous footway and in places the footway is narrow. Concern has been expressed from objectors that using the B1456 for walking or cycling is already dangerous, and that this danger will be exacerbated by increased traffic. The Applicant’s point to their survey information showing a low level of pedestrian movement along and across the B1456 at present, but the aims of sustainability are such that*

encouragement should be given to walking and cycling as alternatives to use of the private car. The distances between Shotley and Ipswich, or indeed between other villages on the B1456 are such that walking would not be convenient, even were there a continuous footpath, but walking within villages or into villages from some outlying dwellings would be possible, as would cycling, which is helped by the relatively flat terrain. The extent to which this development would make the B1456 less attractive to walk or cycle along, or to cross is a flaw in the proposal”.

4.22 I concur with the Head of Planning’s view that the aims of sustainability by walking and cycling as alternatives to use of the private car would be compromised by the increases in traffic generated by this development on a network of highways, many of which are unsuitable for such use and for whom no provision or improvement is made by this development.

4.23 Paragraph 19 of PPG13 states: *“a key planning objective is to ensure that jobs, shopping, leisure facilities and services are accessible by public transport, walking and cycling. This is important for all, but especially for those who do not have regular use of a car, and to promote social inclusion.”* This paragraph goes on to state that emphasis should be placed on accessibility to ensure developments will offer **realistic**, safe and easy access by a range of transport modes, and not exclusively by the car.

4.24 The proposals before me make no specific reference to improvement of bus services between the site and other urban areas such as Ipswich. However, the suggestion is made that improvement to bus services could potentially be secured through a Section 106 obligation between the developer and the Council.

4.25 In the resolution of the Committee of the 8th June 2005 it is stated under Item 2, subsection (c) that contributions should be sought to establish a half hourly bus service to Ipswich. At the time of writing this evidence I had not seen a draft of the Section 106 Agreement. However my own view is that on the basis that it does contain provision for a half hourly service to Ipswich,

the development would still not offer realistic access by a range of transport modes. I explain this rationale later in this section of my Proof of Evidence.

4.26 Paragraph 22 of PPG13 states that: *“good partnerships between local authorities, transport providers and operators, developers, businesses and local residents are essential to achieving the objectives of this guidance. Local authorities should work with business, community and transport interests to ensure that plans and proposals are feasible. Likewise developers should discuss proposals with the local authority and transport providers and operators at the earliest stage.”*

4.27 To date I have seen no evidence to suggest that the developer has been in discussion with local bus operators regarding the provision of an improved service to and from the site. Given the site’s obvious failings in terms of its transport sustainability I am surprised that greater efforts to secure improved bus services were not explored at the application stage.

4.28 Given the location of the development my own view is that bus operators are likely to require any improved bus services to be subsidised heavily by the proposed development. Given the uncertainty over the viability of any improved bus services, I consider that any agreement between the developer and the local bus operators should offer improved bus services in perpetuity and not on a limited basis.

4.29 It is common for developers to enter into an agreement to provide improved bus services for a limited period, say three years, after which time, if the new route is not viable, it can be removed by the operators. I am of the clear opinion that any improved bus facilities provided to and from this site would have questionable viability and bus operators could not be expected to run a loss making service. As such, I am dubious as to whether a long term improvement to bus services would be delivered by this development, which would further jeopardise the sustainability of the site.

4.30 At paragraph 40 PPG13 states that: *“in rural areas, potential for using public transport and for non recreational walking and cycling is more limited than in urban areas. However, the need for the same overall policy approach outlined in paragraphs 18 to 31 is as great in rural areas as it is in towns in order to help promote social inclusion and reduce isolation for those without use of a car”*.

4.31 It is my view that the rural location of this development brings it into direct conflict with sustainable transport policy guidance at both a National and Local level. This view is shared by the Head of Planning at Babergh District Council. The Council's committee report concludes that this development is in an unsustainable location which is likely to increase the need to travel by unsustainable means of access to services, jobs and facilities. In my view the potential for improving public transport to a half hourly service to and from Ipswich, together with potential improvements to the ferry services between Harwich, Felixstowe and Shotley Gate are insufficient to bring this development into line with sustainable transport policy.

4.32 Paragraph 41 of PPG13 deals with remote locations. It states that, *“the availability of previously developed land is not, in itself, a sufficient reason for developing in such locations.”*

4.33 Paragraph 43 of PPG13 states, *“in order to reduce the need for long distance out commuting to jobs in urban areas, it is important to promote adequate employment opportunities in rural areas.”* In this regard the Council acknowledge in its Committee Report at paragraph 6.46 that the Shotley area *“is not a good place to expect new jobs to be created, because of its isolated location”*. It suggests that there is scope for some growth and the application proposes some 950 m² of increased employment floor space, sufficient for 13 to 14 jobs. This would only accommodate a very small proportion of the residents of this development, 305 of whom (according to the Committee Report) would be economically active. The report goes on to say that

sufficient new floor space to accommodate all of the economically active residents of this development is unlikely to be viable in this location.

4.34 At paragraphs 75 to 77 PPG13 sets out guidance in respect of walking. There are no measures for improved pedestrian facilities set out within the TA beyond the curtilage of the site. I consider this to be a failing of the development as paragraph 75 of PPG13 states that *“walking is the most important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly under 2km”*. The Council recognise this point in their committee report at paragraph 6.22 where it is stated that *“the extent to which this development would make the B1456 less attractive to walk or cycle along or to cross, is a flaw in the proposal. Of particular need is the improvement of pedestrian and cycle links between Shotley Gate, which would accommodate this development, and Shotley Street, where the Village Hall and Primary School are situated”*.

4.35 The relationship between Shotley Gate and Shotley Street is illustrated at Appendix SRB1. Shotley Street is located approximately 2km north of the centre of the proposed development.

4.36 Guidance in respect of cycling is set out in paragraphs 78 to 80 of PPG13. Again no improvements or provision for off site cycle facilities are contained within the Transport Assessment accompanying the planning application as prepared by JMP Consulting. Given the nature of the B1456 and other country lanes in the vicinity of Shotley and the distances of services from the development, which are significant, I do not believe that cycling offers a realistic option to sufficiently reduce reliance on the private car to make this development sustainable.

4.37 Paragraphs 87 to 91 of PPG13 refer to travel plans. The last sentence of paragraph 89 states that, *“unacceptable development should never be permitted because of the existence of a Travel Plan”*. I agree with this statement and would draw parallels between this and the provision of a Section 106 Agreement which addresses sustainable transport measures.

Given the unsustainability of the development site, the District Council in their committee report and subsequent resolution sought to place significant emphasis on the provision of a Section 106 Agreement which would potentially address this matter. Specific measures such as contributions to the improvement of the Shotley / Harwich / Felixstowe ferry and contributions to establish a half hourly bus service to Ipswich together with increased pedestrian and cycle provision are set out within the resolution. It is my view that the matters which the Council are expecting the Section 106 Agreement to address are more fundamental than measures which a financial contribution could be expected to address. No amount of Section 106 contributions could relocate the site to a sustainable location.

4.38 Based upon the evidence set out above, it is my view that this development is in clear conflict with sustainable transport policy as set out at a national level.

Suffolk Structure Plan & BDC Local Plan

4.39 Transport policies set out within the Suffolk Structure Plan 2001 and the Babergh Local Plan Alteration no. 2 Second Deposit Draft, May 2003 broadly reflect national policy guidance on transport set out in the Governments Planning Policy Guidance.

4.40 Policy T14 of the Structure Plan sets out the need for a Transport Impact Assessment (TIA) to accompany major development applications. It requires the TIA to:

- *“demonstrate how the development contributes to the objective of minimising the need to travel and encourage modes other than the private car;*
- *Make appropriate and staged payments for public transport, cyclists and pedestrians”.*

4.41 In my view, the Transport Assessment accompanying the planning application made little attempt to demonstrate how the development would minimise the need to travel and encourage modes of transport other than the private car. In this regard the JPM report outlines within Chapter 10 the “*sustainable access strategy*”, the means by which the proposed masterplan will promote sustainable travel. The key measures outlined are as follows:

- The provision of local retail and commercial land uses;
- A relocated and improved bus stop;
- Internal road layout design to reduce car dominance;
- Provision of a Travel Plan to include public transport information, lift share scheme, bike pool scheme etc.

4.42 It is purported in the TA that the implementation of the above measures would mean that “*the revised Masterplan proposals are compliant with relevant integrated transport and land use planning policies at a national, regional, county and local policy tiers.*” In my view, the contents of the Transport Assessment do not sufficiently demonstrate how car travel can be minimised and other modes of travel encouraged. Indeed the sustainable access strategy set out within the TA makes no reference to the improvement of bus services to and from the site.

4.43 Paragraph 10.4 of the Transport Assessment dated the 26th July 2004 states that the aim of the Sustainable Access Strategy put forward by the development is to effect, where possible, a change of travel patterns of both existing and future residents, encouraging short distance, non car based trips to the village square rather than longer distance car based trips on the B1456 to / from Ipswich and other centres. It states that the proposed retail and commercial uses have been carefully targeted to meet identified local shopping and employment needs accordingly. My view is that whilst this may be true for a small proportion of trips generated by the site, it would not

replace the vast majority of longer distance trips, particularly journeys to work, to major shopping facilities, to leisure facilities, to school and other services. These trips would continue to require a relatively long journey to be made, the overwhelming majority of which I consider would be made by private car and not by sustainable modes of transport from this location.

4.44 Policy CS3 (E) of the Structure Plan identifies criteria for villages that could accommodate new housing development and states that these villages will be identified in Local Plans. The Council's Committee Report refers to this at paragraph 6.5 and states the criteria as being the following:

- Primary School;
- Good journey to work transport to a town;
- Convenience goods shop;
- Community, Leisure and Social facilities;
- A variety of employment opportunities which have potential for further development.

The Committee Report states that: *"while Shotley has some of these, it lacks a variety of employment opportunities and good journey to work transport and has thus not been judged to be a sustainable village (In policy HSO3 of the Local Plan)".* It is clear therefore that the proposed development does not accord with Structure Plan Policy CS3 and concur with the Council's view that the criteria to accord with Policy CS3 are not met in this case.

4.45 Policy CS10 of the Structure Plan refers to an integrated development and transport strategy which requires development to be located and designed so as to minimise the need to travel. This Policy is cited as part of the proposed Reason for Refusal as set out in the Council's Committee Report on the 8th June 2005. Given the location of this site and the evidence I put

forward, I consider that the proposed development is in conflict with this Policy.

4.46 With regard to the Babergh Local Plan (Alteration No. 2 Second Deposit Draft – May 2003), chapter 9 deals with the Council's Sustainable Transport Policy. The objectives set out within paragraph 9.7 seek to balance the needs of the car against the needs of public transport and non motorised users such as cyclists and pedestrians, to reduce the environmental impact of travel and to limit the growth of road traffic, to encourage the use of modes of transport other than the private car and to make adequate provision for all transport modes in new developments and to reduce the need for travel through improved land use and development strategies through better integrated planning.

4.47 With regard to major development, Policy TP20 expects applications to be accompanied by a Transport Assessment which considers the modal split of journeys to and from the site and details of proposed measures to improve access by walking, cycling and public transport. The Transport Assessment accompanying the planning application failed to identify the modal split of journeys to and from the site which further brings into question the sustainability of the site in transport terms.

Rationale

4.48 I have set out relevant policy at national and local level in respect of sustainable transport. The relative distance between the centre of the development site and local services is illustrated on the Local Accessibility Plan at Appendix SRB2 to this evidence. This plan illustrates that main services and retail areas are located in Ipswich which is approximately 16km from the site. The only facilities that are available locally are the local Primary School, convenience shop / post office and some community leisure and social facilities.

4.49 The local area offers limited employment opportunities and has no rail connections. The Harwich ferry service which runs between Felixstowe, Harwich and Shotley does not run at peak periods and is currently a seasonal service. It therefore offers very limited options for connecting the site between Felixstowe and Harwich on a regular basis. Main Health facilities are located in Ipswich with the closest Doctor's Surgery in Shotley Street.

4.50 Details of the existing bus services between the site and the surrounding area together with existing ferry services and the Buzzabout service are given at Appendix SRB3 to this evidence. These show that two bus routes currently serve the site, namely the 97 (including the 97B) and the 98 service. The 97 service offers a direct service between Shotley and Ipswich with a journey time of 35 minutes. This service operates at a 40 minute frequency during the morning peak and an hourly service during the evening peak and at other times. There is no service after 7pm or on Sundays.

4.51 The 98 service also runs between Shotley and Ipswich but goes via Holbrook. Journey times between Shotley and Ipswich are longer than the 97 at an average of 40 minutes. This service has a frequency of only 1 bus every 2 hours at best throughout the day and operates up to 11.15pm. there is no service on Sundays.

4.52 It is evident from the above that existing bus frequencies serving the local area are low. I consider these to be well below what would typically be required to service a sustainable site. In this respect a 15 minute service would enable those using the bus to travel on a 'turn up and go' basis without having to rely on timetables. Frequencies of 30 minutes and above would typically result in significant wait times if bus timetables are not strictly adhered to which is a common occurrence in practice. As such, headways of 30 minutes or more are unlikely to result in any significant modal shift from the private car.

4.53 Clearly any improvement in bus services between the site and Ipswich would only benefit journeys being made between the site and Ipswich and destinations en route. In this regard I have interrogated the 2001 National Census data for origin / destination statistics for local Wards in this area. Details of this assessment are contained in Appendix SRB4 to my evidence. This information shows at Tables 1 and 2 the percentage of trips on a journey to work basis originating within the Berners Ward (which includes Shotley, Chelmondiston, Freston and Woolverstone) and travelling to Ipswich Town Centre, the outer areas of Ipswich, Harwich, Felixstowe and other destinations. Table 1 shows that only 27% of those trips actually travel to Ipswich Town Centre with 21% travelling within Berners Ward itself.

4.54 Table 2 shows the modal split of these trips on an area by area basis and demonstrates that of those travelling to Ipswich Town Centre, 19% already use modes of transport other than the private car and 14% already use the bus. As such, approximately **22%** of all journeys to work from the Berners ward to Ipswich Town Centre could be influenced by the improved bus service (i.e. 81% of 27%). However, given the potential wait time and potential unreliability of service, together with increased journey time associated with the bus, it is likely that only a small proportion of these will actually transfer to the bus.

4.55 In practice, some of the 21% of trips travelling within the local area could also transfer to bus but, as can be seen from Table 2, only 2% of trips within the local ward are currently carried out by bus, including the Buzz-About service. Given the linear nature of the potential improved bus service only about half of these are likely to be potentially affected by the improved service, representing 10% of trips. Given the current 71% modal split to car within the ward, this would equate to **7%** of total trips being potentially influenced by the improved service.

4.56 Travel to the outer areas of Ipswich account for 15% of all trips to work from the Berners Ward with only 2% of these using the bus. The comparison of this bus usage with bus usage for trips to the town centre demonstrates the

relative difficulty of travelling to Ipswich outer area by bus. As such, it is expected that most trips to the outer areas of Ipswich would not be affected by the improved bus services on the B1456 to any significant degree. In this regard you will note that the Ipswich town centre catchment used in our analysis includes the Bridge Ward which, strictly speaking, is slightly south of the town centre but includes the southerly route into the site along the improved bus service.

4.57 The only other aspect of the journey to work that may be affected by a new bus route would be that element of trips to other destinations (which in total represents 33% of total journeys to work from Berners Ward) travelling by train from Ipswich. It is evident from Table 2 that 8% of these trips are by train, some of which are likely to be via Ipswich and some via Manningtree. On the basis that 4% may be via Ipswich Railway Station, then these trips could potentially be carried out in future by bus.

4.58 It total therefore, I estimate that an improved bus service between Shotley and Ipswich on a half hour frequency basis could potentially influence 33% (i.e. 22% + 7% + 4%) of the journeys to work from Berners Ward leaving 67% of trips with no improved travel choice. In practice however, given the relative bus journey times, the convenience of the car and lack of any additional measures to restrict the usage of the car, I would estimate that the take up or modal shift to bus would be low, possibly of the order of 10%, which from a potential total of 33% would be very low, i.e. 3% of trips. In my view, this would be insufficient to demonstrate that the site meets with the sustainable objectives of the Council and National Transport Policy.

4.59 It is evident from this analysis that some 73% of trips to work from Berners Ward are outside Ipswich Town Centre, which the enhanced bus service would not serve. Admittedly some of the trips within the local Ward would benefit from the additional services but this leaves the majority of trips unaffected by the new bus service. These trips would continue to be heavily reliant on travel by the private car. For example, 85% of trips to other destinations are made by the private car, 100% of trips to Harwich and

Felixstowe are by private car (note: none by ferry) and 94% of trips to the outer areas of Ipswich are by car.

4.60 My assessment is borne out by statements made by the Head of Planning in the 8th June 2005 report to the development committee.

4.61 Whilst I have already made direct reference to the committee report in my review of the Policy aspects of the scheme, I summarise the conclusions of the Council's Head of Planning on this issue for completeness.

- *Paragraph 6.1 “the site lies at the end of a peninsula remote from any significant service or employment centre and access by land or water is not good. In short, it is not a sustainable location”.*
- *Paragraph 6.2 “poorly located site conflict with PPG13”.*
- *Paragraph 6.5 “Shotley lacks a variety of employment opportunities and good journey to work transport and has thus not been judged to be a sustainable village (Policy HSO3)”.*
- *Paragraph 6.7 – with regard to the retirement community extant consent for 404 dwellings. “I do not believe there is a significant likelihood of that planning permission now being implemented – it was initially sought in 1998 and had there been a realistic chance of that development proceeding then I would consider it would have done so by now. To that extent it should not weigh heavily in the balance of this decision”.*
- *Paragraph 6.22 “the extent to which this development would make the B1456 less attractive to walk or cycle or to cross is a flaw in the proposal.”*

- *Paragraph 6.26 “the increased traffic will make the road less desirable for increased use by pedestrians and cyclists and this will be to the detriment of sustainability objectives”.*
- *Paragraph 6.43 “The application site is located a considerable distance from significant centres, the nearest being Ipswich, and journeys on foot or by bicycle will be limited to the immediate vicinity of Shotley Gate”.*
- *Paragraph 6.45 “Isolated location in an unsustainable settlement”.*
- *Paragraph 6.46 “The application does not demonstrate that it can deliver the local jobs that will help establish sustainability”.*
- *Paragraph 6.47 “With its present proportions of residential to non residential, the development will not contribute to the increased sustainability of Shotley”.*
- *Paragraph 6.50 “The accessibility in a wider context to jobs and services is poor”.*
- *Paragraph 6.52 “It is concluded that this application must fail because it does not address the issue of sustainability sufficiently and will in some ways make Shotley a less sustainable place. Particular examples are the ability to secure adequate employment in Shotley and the impact that increased traffic on the B1456 would have on pedestrian and cycle movements.”*
- *Recommendation for Refusal of planning permission on the grounds that “development in an unsustainable location, likely to increase the need to travel by unsustainable means to access services, jobs and facilities, therefore contrary to the Policy contained in PPS1 and PPG3 contrary to the objectives of the Babergh Local Plan and Structure Plan Policies”.*

5.0 REVIEW OF TRANSPORT ASSESSMENT BY BUCHANAN CONSULTING ENGINEERS

5.1 I refer to Core Document 81 which is a copy of a report prepared by Buchanan Consulting Engineers in November 2004 reviewing the Transport Assessment prepared by JMP Consulting Ltd which supported the Planning Application for the proposed development. The preparation of this report was carried out whilst I was employed by Buchanan Consulting Engineers and I personally managed this project on behalf of the Parishes of Shotley Peninsula at the time. As stated in Section 1.0 of this Evidence, I have since left Buchanan Consulting Engineers and I am now a Director of Odyssey Consulting Engineers Ltd.

5.2 The BCE report raises a number of issues in relation to the submitted TA. The main issue raised in the report concerns the link capacity assumptions made by JMP. Other matters include trip generation assumptions and mitigation measures. The report also refers to national and local policy considerations at Section 3.0, but this has already been covered earlier in my evidence.

5.3 The residential trip rates used in the TA were derived from the TRICS database, which is reasonable. However, the comparator sites selected are predominantly in urban environments which would typically generate a higher trip rate by non-car modes, thus potentially resulting in an under-estimate of the vehicle trip generation from the HMS Ganges site.

5.4 The trip rates derived for the retail elements of the site were taken from the TAVL database, which is a London based database. The comparator sites are in the London boroughs of Sutton and Waltham Forest, the locations of which are not comparable with the Shotley Peninsula.

5.5 In terms of mitigation, the BCE report states that there are in practice only 3 options to mitigate against the operation of a highway beyond its link capacity, namely:

- Enhanced link capacity along the route;
- Alternative route options;
- Significant modal shift away from the private car.

5.6 In the absence of any proposals by the development to enhance link capacity or to put forward alternative route options a modal shift would appear to be the only option available to reduce the volumes of car based traffic on the B1456.

6.0 B1456 LINK CAPACITY IMPLICATIONS

6.1 The JMP report identifies the B1456 as the primary route for vehicles arriving and departing from the proposed development site to and from the wider area and on towards Ipswich. Given the restricted nature of this route, the TA endeavours to demonstrate that the route has sufficient link capacity to accommodate the expected growth in vehicle movements. No allowance is made within this assessment for any sensitivity testing to take account of any daily variance in background traffic flows or selected trip rates.

6.2 The TA utilises the Highways Agency document "Traffic Capacity of Urban Roads" TA 79/99, which is a core document (CD89) to this Inquiry and detailed link traffic surveys to estimate the link capacity of the route. The TA acknowledges that TA 79/99 is intended for use within urban areas, but suggests that "*...it is a useful comparator*" and as such implies that it can be used as a guide to the capacity of rural roads. Whilst I agree that TA 79/99 is a useful tool, even on the B1456 as a rural road, the information provided within it should be used carefully.

6.3 The capacity estimates in the JMP TA have assumed that the B1456 is consistent with road type UAP3 as defined in TA 79/99. The TA also assumed for the purposes of link capacity assessment, a minimum carriageway width of 6.1 metres, resulting in a derived two-way capacity of 1500 vehicles per hour split 900 to 600 (60% / 40%) in the peak direction of travel.

6.4 JMP's own survey contained in the TA demonstrates that the road width of the B1456 is often significantly less than the 6.1 metres with a minimum width of 5.35 metres. I consider that the general categorisation of the B1456 as a type UAP3 road is therefore optimistic given the restrictive nature of the route at a number of points. I acknowledge that Table 2 of TA 79/99 does not include data for road widths below 6.1 metres, however I believe that some consideration should be given to these road conditions in order to arrive at a reasonable link capacity along the constrained sections of the B1456. In this regard, I should make the Inquiry aware that TA 79/99 is

intended for use with new and proposed improvements to existing roads and, as stated within the document, *“may also be used as a guide to the capacity of existing urban roads”*.

6.5 At this stage it is important to point out that in certain circumstances the *“environmental capacity”* of a road should be considered alongside its physical capacity. As outlined in Section 32.4 of *“Transport in the Urban Environment (IHT, 1997)”* the relevant extract from which is enclosed at Appendix SRB5 to this evidence, the capacity of a road, when giving consideration to environmental conditions, is likely to be considerably less than its measured physical capacity. The above document states that when determining the environmental capacity of a road *“..... local factors, such as frontage activity, conservation area designation and the location of Schools and Hospitals, would also play a part”*. Whilst some of these factors, such as frontage activity, are to a degree accounted for in TA 79/99, the others such as conservation area designation along the narrow section of the road within Woolverstone and local factors such as particularly narrow footways, and the presence of a large school with significant pick up / drop off activity should be considered.

6.6 On the basis of the above, it is my opinion that the capacity of the B1456 at the constrained sections identified by JMP’s own survey, between its junction with the B1080 and Shotley would be 1200 vehicles per hour two-way or 720 / 480 based upon a 60% / 40% split in the tidal direction. This estimate has been derived by maintaining the assumption of the B1456 as a UAP3 road but extrapolating the link capacity back to reflect the actual width of the carriageway at the constrained sections using the other assessments contained in TA 79/99.

6.7 On this basis the forecast increase in traffic levels on this section of the B1456 as a result of the proposed development (as presented in paragraph 8.54 of the TA) would exceed the capacity of the link in the AM peak period and bring it up 93% of its capacity in the PM peak.

6.8 Given the above, I am of the view that the addition of the forecast levels of traffic generated by this development to the B1456 would result in additional congestion along its critical sections, particularly when vehicles are required to stop at the kerbside for delivery and pick up and drop off purposes. It would also make the B1456 less attractive to walk or cycle along or to cross, both for existing users and for those residents of the proposed development who may consider using it, which would be detrimental to sustainable transport objectives.

6.9 Furthermore, the increase in traffic levels to a point where link capacity is exceeded, is likely to worsen road safety conditions, particularly for pedestrians seeking to cross the road, and for those using the narrow footways within the villages and settlements along its route, particularly the narrow section within Woolverstone village, where the carriageway width reduces to 5.5m.

6.10 The TA prepared by JMP included a road safety assessment. However, at the time it was produced it did not include the most recent personal injury accident data for the B1456 including 20 further injury accidents, 2 of which were fatal and 6 of which were serious. Elizabeth Aldous's statement on behalf of Freston Parish Council is relevant in this respect.

6.11 Given the accident history within the vicinity of the Freston Crossroads, it is in my view that the failure of the proposed development to accompany the proposed junction modifications at the Freston Crossroads with a Stage I Road Safety Audit is a shortcoming of the submission.

6.12 At the time of writing this Proof of Evidence I have seen no tangible measures to mitigate the impact of increased traffic generated by the proposed development on the B1456 link as it passes through the villages of Chelmondiston and particularly Woolverstone where traffic flows are higher and the carriageway width is particularly narrow.

7.0 CONCLUSIONS

7.1 I have considered within this evidence issues relating to highways and transportation and in particular matters of transport sustainability and link capacity on the B1456.

7.2 Accordingly, my evidence demonstrates that:

- (i) The development site is in an unsustainable location both in terms of its accessibility by means of transport other than the private car, and its accessibility to jobs, schools, shopping and other services in direct conflict with PPG's 3, 7 and 13, and sustainable transport policies at a local level.
- (ii) Even if the bus service between the site and Ipswich Town Centre could be provided at an increased frequency (of say 30 minute headway) and on acceptable terms, approximately 73% of the trips expected to be made from the new development would be to and from an area outside Ipswich town centre and as such would not potentially benefit from the improved bus service by effecting a modal shift. Trips to these areas would therefore continue to have no realistic choice of travel mode and would, in my view, continue to rely almost entirely upon the private car. Trips to Felixstowe and Harwich represent a very small proportion of total work trips to and from Berners Ward. The potential improvements to ferry services is unlikely, in my view, to make any material inroads to modal shift.
- (iii) Based on a reasonable interpretation of link capacity assessment standards, the proposed development during the busiest periods of the day would result in the critical section of the B1456 through Woolverstone operating beyond its theoretical capacity, which would lead to congestion, a deterioration of road safety conditions, increased conflict with

other road users, particularly pedestrians and cyclists, which would be detrimental to sustainability and a worsening of environmental conditions within the village centres.

7.3 In my opinion, and on the basis of the points raised, this development should be refused on highways and transportation grounds.

Appendix SRB1

Location Plan

Appendix SRB2

Local Accessibility

Appendix SRB3

Current Bus & Ferry Services

Appendix SRB4

**National Census Origin /
Destination Statistics for Local Wards**

Appendix SRB5

Section 32.4 of Transport in the Urban Environment (IHT 1997)