

1 Introduction

- 1.1 In December 2016 Derbyshire Dales District Council (DDDC) resolved to submit their Pre-Submission Draft Local Plan (DDL P) together with a Schedule of Minor Modifications to the Secretary of State for Examination in Public.
- 1.2 Derbyshire Dales sits within the wider area of the Peak District, which extends beyond the boundaries of the Peak District National Park (PDNP). The area covered by the Derbyshire Dales Local Plan is that part of Derbyshire Dales which sits outside the PDNP, a local planning authority in its own right. The Derbyshire Dales includes a cross boundary transport network that falls under the responsibility of Derbyshire County Council, as local highways authority (LHA) and Highways England. DDDC is the Local Planning Authority (LPA) covering the Derbyshire Dales outside of the PDNP and is responsible for all planning matters except for mineral and waste planning applications. Highways England is responsible for the management of the Strategic Road Network (SRN) which in the Derbyshire Dales is principally the A50, on the southern part of the District.
- 1.3 Derbyshire County Council has for some considerable time been working with DDDC to assist in the development of the Local Plan's transport evidence. This work has been progressed in the form of a two-staged analysis, [Stage 1: Strategic Transport Issues Report](#) and Stage 2: Traffic Impacts of Proposed Development together with the [Derbyshire Dales Local Plan Transport Study](#). Copies of the relevant transport studies are available on the [EIP Public Document Library](#).
- 1.4 This Transportation Issues Paper has been prepared by Derbyshire County Council. Its purpose is to set out the position of the Highway Authority prior to the Local Plan's Examination in Public (EIP). A further strand of work has been undertaken by the Authority's Highways Development Control Service, principally focused on individual sites, specifically access considerations. This strand of work has set out to establish whether a safe and satisfactory access can be achieved for each individual site. It forms part of the LPA's [Sustainability Appraisal Report\(s\)](#).

2 The County Council's Approach to Development Control

- 2.1** The County Council as LHA is a Statutory Consultee in the planning process. The Highway Authority when consulted about any planning proposal which has some implication for the highway network would normally provide the District Council with impartial advice regarding the highways and transportation implications of proposed development. In assessing planning applications, the Highway Authority will use all of the appropriate technical criteria including the Design Manual for Roads and Bridges, Manual for Streets I and II and the Department for Transport's Transportation Assessment Guidance¹ and carry out an extensive and thorough appraisal of the applicant's submission.
- 2.2** These documents are used in conjunction with the application of engineering judgement to ensure that designs are as safe and efficient as is reasonably possible.
- 2.3** The LHA does not however act as an advocate or objector to proposed development on behalf of third parties, who together with members of the public are at liberty to make their own comments to the LPA. As LPA, DDDC is responsible for determining whether a particular site is suitable for proposed development, balancing all material considerations.
- 2.4** The LHA is however, mindful of the Government's National Planning Policy Framework (NPPF), in particular Paragraph 32, whenever it prepares its response to any planning application. The NPPF requires that all proposed developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment.
- 2.5** It is expected that where appropriate, a Transportation Assessment will be required to support any planning application for each proposed site, the scope of which should be agreed with the Local Highway Authority beforehand. The purpose of the Transportation Assessment is to examine the effects of development related traffic on the surrounding highway network in terms of safety, highway capacity and sustainability.

¹ Albeit withdrawn October 2014 the GTA is still regarded by transportation practitioners as basis for a transportation assessment or transport statement.

- 2.6** Significantly, in so far as the LHA is concerned, the NPPF states that “Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe”. Consequently the definitive ‘test’ when responding to the planning application is whether or not the impact of the development related traffic would be significant enough to warrant a technical recommendation of refusal of planning permission. In order to do this the Highway Authority would have to demonstrate that not only would the volume of extra traffic be sufficiently large but that it would cause severe harm to highway safety or operations.
- 2.7** Generally speaking, the County Council’s primary aim is to facilitate new development where possible, provided it is safe, accessible and sustainable. The Transportation Assessment Guidance advises that the highway network should provide capacity that is comparable to the general capacity of the part of the network affected. Consequently the County Council, when responding to some planning applications, has indicated a need to adopt a less restrictive approach to a requirement to achieve a ‘nil detriment’.

3 Local Plan Proposals

- 3.1** The DDLP’s housing target has been informed by the evidence of capacity from various studies with information gathered about capacity, constraints and opportunities. However, there are very significant constraints on the capacity of the plan area to physically accommodate the amount of development required particularly in terms of environmental considerations with limited scope to amend green belt boundaries.
- 3.2** There are significant environmental constraints to development in the Derbyshire Dales and the PDNP and any impacts on the National Park and its setting from the development of land outside it. The DDLP recognises that there are major infrastructure constraints which cannot be overcome during the plan period and which limit the extent of further growth, particularly the main road connections on the A6 Corridor.
- 3.3** The DDLP supports a housing target of 322 dwellings per annum Table 1 below, sets out the Strategic Housing Requirements. Table 2 shows additional housing proposed across the Derbyshire Dales.

Housing requiring (OAN) 2013 - 2033	6,440
Total commitments 2013 – 2016	402
Not Commitments (April 2016)	1,785
PDNPA Contribution 2016 - 20133	261
Other Resolution to Grant	577
Allocated Sites	3,188
Sub Total	6,571

Table 1 Strategic Housing Requirements

Location	Existing Dwellings	Proposed Dwellings	Increase
Matlock Town	5,113	1,513	29.9 %
Wirksworth Town	2,776	880	31.7 %
Asbourne Town	3,905	1,774	45.4 %
National Park	18,360 ²	0	0 %
Derbyshire Dales	33,481	6,571	19.6 %

Table 2 Summary of the Proposed Location of Housing Growth

3.4 As can be seen from the above table, the three market towns are required to accommodate over 50% of the District's Objective housing Needs. Consequently in view of both National Park and topography of the Derbyshire Dales there is little scope for the allocation of housing in 'other' i.e. urban and therefore sustainable areas within the district.

4 Transport Study Findings

4.1 The Transport Study considers two scenarios, a 'do-minimum' based upon existing (observed) traffic flows and a 'do something' that reflects the incremental impacts arising from the objective assessment of (housing) needs (OAN).

² Includes dwellings in PDNP outside of the Derbyshire Dales

- 4.2** The capacity assessments predict that the junctions in Matlock will operate reasonably satisfactorily in the 'base case'. Tables 5.2 – 5.6 of the Transport Study represent the non-mitigation scenario with the development case, and application of the OAN housing, significant queuing is predicted at both Crown Square and Starkholmes Road at its approach to Matlock Green.
- 4.3** It should be noted however that these are 'demand' flows. The software used in the capacity assessment of the roundabouts and priority junctions respectively use algorithms developed by the Transport Research Laboratory. The junction capacity calculations apply an algorithm to predict queues and although whilst satisfactory for the prediction of queuing at a particular junction, nevertheless the prediction of queues can become theoretical in that once the junction becomes 'saturated', the queuing prediction simulation software merely assumes that traffic will be add onto back of a queue. In other words, a driver will simply wait their turn, which as the calculations indicate, could be for up to an hour.
- 4.4** On this basis therefore the peak hour assessments, could, if taken at face value, be interpreted as being 'severe'. Clearly however, this not a realistic assumption. It is not considered likely that a driver will simply sit in a queue for up to an hour. Drivers more than likely will make behavioural changes in their travel behaviour; this could take a number of forms including re-routing their journey, retiming the journey, adopting an alternative more sustainable mode of travel or simply not make the journey at all.
- 4.5** The junction of Sturston Road and Derby Road in Ashbourne has previously been identified as a constraint. During peak periods, westbound traffic on Sturston Road waiting to enter the junction forms long queues which have a negative effect on the flow of traffic through junctions extending all the way back into the centre of Ashbourne.
- 4.6** Following a number of relatively recent Planning Appeals, planning consent has been granted for development on a number of sites. Extensive planned housing developments around Ashbourne will significantly increase the traffic flows at these junctions, particularly travelling west on Sturston Road into the junction with Derby Road which inevitably will add to congestion on Sturston Road, resulting in a potentially significant increase in traffic movement through the junction by 2030. Furthermore, the existence of listed buildings near the Sturston Road/Derby Road junction limits the options available for improving the nature and layout of that intersection.

- 4.7** Possible changes that could be made to improve the capacity, operation and efficiency of the Sturston Road/Derby Road junction for the future have been considered. Capacity assessment has indicated that existing junction capacity is insufficient to accommodate the larger traffic flows envisaged for 2030. After considering different methods for making improvements, a version of the Sturston Road/Derby Road junction with increased capacity was developed. A scheme to provide capacity enhancement to the junction albeit that would require acquisition of property/land, road widening and possibly banned traffic turning movements demonstrated that it would greatly improve the predicted 2030 performance of the Sturston Road junctions.
- 4.8** However, the improved scheme of traffic signal control would not provide a positive practical reserve capacity for either the morning or evening peak periods in 2030 and congestion could still occur at those times. However, any queuing would be on a smaller scale with the suggested traffic signal control scheme and layout. The demolition of numerous buildings, some of which are currently in use, would be required.

5 Local Highway Authority Consultation

- 5.1** The Local Plan Transport Study considers traffic impacts upon specific junctions with capacity assessments undertaken on sections of the road network considered likely to be impacted upon by traffic from the proposed new development sites.
- 5.2** The District Council undertook six weeks of consultation on its Draft Local Plan (DLP) from 7th April 2016. The County Council's formal response to the DLP was considered at a Meeting of the Cabinet Member for Highways, Transport and Infrastructure held 12 July 2016. The meeting was attended by both Members of the public and Elected Representatives. In its letter of 21st July, and 22nd September the County Council LHA provided additional technical highway comments referred to in the report on the findings of the Local Plan Transport Study. The LPA undertook Pre-Submission Draft Plan, from 11th August 2016 to 22nd September 2016. This was considered by the County Council at a further meeting held 25 October 2016 with further correspondence to the LPA dated 2 November 2016.
- 5.3** Copies of both Cabinet meetings together with the correspondence with the LPA form are included in an Appendix to this Transportation Issues Paper.

- 5.4** Briefly, the LHA having carefully considered the content of the Local Plan Transport Study, individual site assessments and other available evidence, the LHA does not consider that it could sustain an objection to the quantum of development proposed in DDLP. The LHA is not however suggesting that the impact of the proposed level of development will be without consequences and that whilst there will be mitigating interventions (both physical and in terms of travel management) which will help limit the effects of the additional traffic, nonetheless an increase in congestion in some locations is probable.
- 5.5** There is as the Local Plan Transport Study points out, scope for mitigation works in the form of physical junction improvements that could be undertaken at Crown Square through possibly, the introduction of traffic signal control and possibly, with the right-turn onto Matlock Bridge banned. Such an arrangement would allow coordination of pedestrian facilities with better management of queues. It is not considered likely however, that introduction of traffic signal control, with single lane entries on all approaches would operate much better than the existing roundabout. In order to secure an increase in junction capacity would require additional flares or lanes on the approach to the junction. It is though unlikely that a larger junction could be delivered without substantially altering the character of the town and loss of some on street parking.
- 5.6** Similarly, introduction of traffic signal control to the junction of Starkholmes with Chesterfield Road, at Matlock Green would allow coordination of pedestrian facilities with better management of queues. Scope exists also to improve the flow of traffic between Dale Road onto Cawdor Way by realignment of the junction allowing traffic across Matlock Bridge and the northbound movement from Dale Road to run simultaneously
- 5.7** A further improvement that would allow the more commodious flow of traffic southbound along Dale Road could be secured by means of a Traffic Regulation Order banning parking during the day. This would though entail the loss of the Colonnade and Weeping Beech Tree together with loss of on street parking. Clearly a balance needs to be struck between the OAN, its impacts, however due consideration needs also to be given to the likely environmental impacts of the mitigation works themselves.

6 Mitigating the Impacts of Development Traffic

- 6.1** Table 5.8 of the Transport Study considers the effects housing needs and how their impacts could be mitigated for example Area Wide Travel Planning, Development Travel Planning Peak Spreading for example, and how this could potentially reduce on an incremental basis, impacts at Crown Square and presumably other junctions in the Study Area. The Highway Authority welcomes therefore, DDDC LP Policy HC20: Managing Travel Demand and the opportunities that this would present for the mitigation of residual cumulative impact.
- 6.2** This Policy gives the strategic context for wider sustainable travel interventions, which could have positive benefits by further reducing the level of capacity reduction already identified in the Transport Study. Policy HC20 also provides the underpinning for the Strategic Site Allocations Policies DS 1 – 9 which include provision for the preparation of Transport Assessments and Travel Plans, including full highways design, specific consideration of public transport routes and subsidies, improvements to existing and development of new pedestrian/cycle routes together with provision for public transport, cycle and pedestrian routes into the relevant town centre(s).
- 6.3** Given the constraints in both Matlock and Ashbourne, it has been further assumed that both proposed sites and existing households would be targeted with a programme of sustainable transport interventions to minimise single occupancy car use. As such, a starting point for the local plan highways mitigation would be:
- Safe and Satisfactory Access from each individual site;
 - Contribution to support local bus services;
 - Site Travel Plan secured by S106, fully funded, monitored and enforced; and
 - Contribution to Area Wide Travel Planning.
- 6.4** In terms of their funding, clearly developer contributions are one obvious source of investment which would be secured through Section 106 Agreements. However in some cases impact may not always be directly attributable to a single site and potential congestion may arise from the cumulative impact of development. Community Infrastructure Levy (CIL) is a further source of potential funding. Consideration could also be given to other potential funding sources, Growing Places, and New Homes Bonus or the Government's recently announced National Productivity Investment Fund.

7 Conclusion

- 7.1** The Derbyshire Dales Transport Study has identified some of the potential congestion problems likely to be exacerbated. Work undertaken by the County Council as part of the Local Highway Authority's response to the DDLP assessed the potential implications of additional residential development in the Derbyshire Dales. It identified additional housing will lead to additional demand for travel. There is though already significant demand for travel both in and around the District and to wider destinations particularly the A6 corridor.
- 7.2** The Transport Study identifies a possible mitigation strategy and this inevitably depends upon the effectiveness of sustainable travel interventions that could be developed through the Local Plan, for example seeking to minimise the number of vehicular trips generated, ensuring good access by sustainable transport modes, and travel plans. This strategy could be extended through the Local Plan to include initiatives to influence travel behaviour in existing communities, a process referred to in the Report as 'trip banking', whereby personal travel planning is used to reduce existing trips, and produce additional network capacity that could be used to accommodate development-related traffic. Such wider sustainable travel interventions could further reduce the level of capacity reduction identified in the Transport Study, although this could also be supplemented by local junction improvements.
- 7.3** The LHA accepts that, in order to facilitate economic growth and meet future housing needs, inevitably some impact upon the highways network may have to be tolerated. Even allowing for all mitigating effects of the interventions discussed in this Transportation Issues Paper, some increases in congestion can still be anticipated. However, based upon all the data and evidence available, the LHA is not in a position to demonstrate that this would constitute severe harm to the operation of the network, particularly in the contexts of other parts of the transport network. The County Council will continue to work with the LPA particularly with regard to the delivery of transport infrastructure needed to support the development proposed through the Derbyshire Dales emerging Local Plan.

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