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Bradford City Centre and Shipley & Canal Road AAP Inspectors MIQ – Highways England responses.

**Q36**

*Q36: Has adequate transport capacity, (including public transport improvements) been appropriately planned for, including on the Strategic Road Network? What are the potential implications of the proposed developments on the transport infrastructure both within and outside of the Plan area and how have they been addressed within the Plans? Is the approach fully justified with evidence, effective, deliverable and consistent with the emerging CS and national policy? Is there adequate up to date evidence to demonstrate that the infrastructure will be implemented in a timely manner to support the proposed development and the strategic objectives? How it will be financed, and by whom?*

In the response to the Publication Draft consultation on the Shipley and Canal Road Area Action Plan, we commented that the Transport Study completed by consultants in 2015 focused on identifying measures to mitigate the local transport impacts resulting from proposed growth in the Shipley and Canal Road Corridor but did not address any issues of linkage with Bradford city centre and other areas beyond the Plan boundary. This approach was reflected in Policy SCRC/SRT1 Transport Improvements.

Although we did not make a similar comment on the Bradford City Centre Area Action Plan during the Publication Draft consultation, the same applies as paragraphs 4.90 to 4.91 and Policy M4 are only concerned with traffic matters inside the Plan area. Paragraph 4.89 states that the “amount of traffic using roads into and out of the centre could grow rather than reduce due to the current levels of development interest……”. The Plan contains no quantification and no proposals to deal with this issue. This omission should be addressed.

Instead, both Area Action Plans rely on the transport policies in the emerging Core Strategy to provide the context for considering transport issues in the wider area of Bradford. Core Strategy Policy TR1 requires development to be “appropriately located to ensure that the need to travel is reduced, the use of sustainable travel is maximised, and the impact of development on the existing transport networks is minimal”. While this is adequate, a more positive reference is needed in the Bradford City Centre Area Action Plan Policy M4 and the supporting text to state that proposed developments need to consider the impact on the Strategic Road Network (SRN) including planned improvements to highway capacity and provision of public transport.

Highways England did however carry out an exercise to understand the potential impact of the AAP’s on the SRN. We based our response to the consultations on the Publication Drafts of both Area Action Plans on the output of our modelling of:

* The traffic impact of individual sites on the operation of the strategic road network.
* The cumulative impact of development proposals included in Local Plans in all five districts of West Yorkshire through our West Yorkshire Infrastructure Study.

We assessed the traffic impact of individual sites using our spreadsheet model (The Network Analysis Tool – NAT). The model output is the predicted number of trips generated by the proposed development on each site on each link on the SRN and its impact on link flows in future years. In relation to the Shipley and Canal Road AAP, our model identified the extent of the potential traffic impact of the proposals for Sites BWQ1 Bolton Woods Quarry and NBW1 New Bolton Woods as the most significant. The two sites together generate a southbound peak hour flow of 70 vehicles on the M606 motorway.

In our West Yorkshire Infrastructure Study, our mesoscopic model was used to assess the impact on the SRN of the forecast future traffic flows at 2022 and 2030 taking account underlying traffic growth in strategic traffic and the traffic generated by the development proposals contained in the Local Plans of all five West Yorkshire Districts.

This indicated that the M62/M606 Chain Bar scheme (M62 junction 26) included in the government’s Road Investment Strategy (RIS) will provide some capacity to cater for additional traffic generated by proposed Local Plan development in Bradford and the rest of West Yorkshire but that further improvements would be required by 2030. It also showed that capacity improvements will be needed at M62 junction 27 at Gildersome by 2022, with further improvements needed by 2030.

Our analysis indicated that the proposals for additional homes in Bradford city centre will not generate a significant impact on the strategic road network. However, growth of 20 per cent in city centre office employment (from 36,000 to 42,000 jobs) during the Plan period will generate significant additional traffic on the SRN in both peak periods. The publication draft of the Bradford City Centre AAP does not translate the number of jobs into a floorspace making it difficult to use the NAT model to assess the impact of any individual sites. This growth will however place additional pressure on Staygate roundabout at the north end of the M606 and on M62 junctions 26 and 27.

It may also be that the scale and distribution of sites proposed in the Calderdale Local Plan, due for Publication Draft consultation in November and December 2016, will have an adverse traffic impact on the M606 Staygate roundabout and M62 junction 26.

The government’s current Road Investment Strategy (RIS) covers the period 2015/16-2019/2020. There is no fixed programme for future RIS periods, although work is currently underway on the second round of Route Strategies which will inform future RIS. Therefore the further improvements identified in our West Yorkshire Infrastructure Study at M62 junctions 26 and 27 are not currently committed and are only potential locations for inclusion in a future RIS programme.

Our view is therefore that employment sites in Bradford city centre will need to consider their impact on the SRN. Transport Assessments should be provided to demonstrate how sites will minimise their impact, including consideration of planned future investments and enhancements to capacity on the SRN. The Shipley and Canal Road Area Action Plan states that development of the land at Bolton Woods Quarry and New Bolton Woods will take place over the period 2015-2030. Both sites will impact on the SRN and their Transport Assessments will also need to demonstrate how the sites will minimise their impact, including consideration of planned future investments and enhancements to capacity on the SRN.

*Q44: What is meant by ‘could/should’ within Policy M4? What is the justification for the requirement that a transport assessment be submitted with all planning applications in the City Centre?*

Policy M4 states that “all developments could/should aim to improve rather than hinder movements around the City”. It is not clear whether “the City” means the city centre or the city as a whole and whether it relates to all modes or just to walking and cycling. It is also not clear whether the reference to “the diversion or increased distances to existing routes” relates to all modes. We have suggested a revision to the wording of the first three sentences to provide clarity.

The Area Action Plan objectives include the delivery of 3,500 additional homes in the city centre, a high quality shopping and leisure offer and an additional 6,000 jobs. This scale of development will generate significant volumes of traffic in the peak hour. Highways England analysis indicates that the proposals for additional homes will not generate a significant impact on the SRN. However, growth of 20 per cent in city centre employment (from 36,000 to 42,000 jobs) during the Plan period will generate significant additional traffic on the strategic road network in both peak periods.

Highways England is concerned with the potential impact of larger developments on the SRN, which we have not to date been able to test through our Network Analysis Tool.

Highways England view is that the larger of the proposed developments in the city centre must be supported by a Transport Assessment and a Travel Plan in order to demonstrate that the maximum use will be made of the sustainable modes. This will have the effect of reducing car use and therefore minimising the adverse impact on the strategic road network. As individual small sites will not have a significant impact, a threshold for provision of Transport Assessment and Travel Plan would be appropriate from Highways England’s perspective. A plot size of 1 hectare would be appropriate but an additional floor space criterion would be needed for multi-floor office development.

**Suggested rewording – Bradford city centre Policy M4**

Proposals and developments introduced by other parts of this plan such as City Living, Office and Employment or Shopping and Leisure should include proposals for improving pedestrian and vehicular movement ~~as~~ where appropriate. All proposals should avoid the creation of barriers to pedestrians and cyclists and~~/or~~ changes to existing routes that result in increased travel distances for pedestrians, cyclists and vehicles ~~the diversion or increased distances to existing routes~~. All developments ~~could~~/should aim to improve rather than hinder pedestrian and cyclist movement~~s~~ around the City. All development proposals in the City Centre (above a threshold of 1 hectare) will have a mandatory requirement to submit a transport assessment with the planning application and will be assessed against policy TR1 of the Core Strategy and the NPPF. The transport assessment for these sites should take account of the impact on the strategic road network including planned capacity enhancements.

**Suggested rewording – Shipley and Canal Road site NBW1**

***Transport and Movement***

* Development will be required to minimise traffic generation and incorporate a travel plan taking into account the adjacent core public transport, cycling and walking networks.
* Any development proposals should be accompanied by a Transport Assessment detailing access and service arrangements and connectivity to the wider highway network including local primary roads and the strategic road network. A Travel Plan will also be required to ensure the site is sustainable and to minimise traffic impacts within and beyond the Plan area.

The development will be expected to:

* Minimise traffic impacts on existing communities and provide mitigation measures within and beyond the Plan boundary, where required.
* Provide safe and satisfactorily access from Stanley Road.
* Protect the function of Canal Road as a key strategic route in the District and support and contribute to appropriate highway improvements through the site.
* Protect an alignment for the proposed Bradford Canal to accommodate future aspirations to reinstate the Canal, in accordance with Policy SCRC/ST8.
* Incorporate and facilitate high quality cycle links through the site and ensure that future development will link to and enhance the quality of the Canal Road Greenway route and retain its attractiveness in terms of gradient and directness.
* Provide new and improved pedestrian and cycle linkages through the site to integrate new and existing communities and provide safe and attractive links to the neighbourhood centre, Frizinghall station and areas of green space.
* Create a network of well-connected and walkable streets and an approach to highway design which supports the quality of the place.
* Be designed to ensure that bus access is achievable.

**Suggested re-wording – Shipley and Canal Road site BWQ1**

***Transport and Movement***

* Any development proposals should be accompanied by a Transport Assessment detailing access and service arrangements and connectivity to the wider highway network including local primary roads and the strategic road network.
* A number of access points may be required to minimise impact on the strategic highway corridor along Canal Road. Appropriate access would be considered from Bolton Hall Road and Livingstone Road to the north and through the adjacent New Bolton Woods site to the south.
* The development should take account of the adjacent New Bolton Woods Masterplan proposals.
* A Travel Plan would also be required to ensure the site is sustainable and to minimise traffic impacts within and beyond the Plan area.

The development will be expected to:

* Provide new/alternative sustainable transport solutions, to ensure the site is sustainable and to minimise traffic impacts within and beyond the Plan area boundary.
* Be designed to ensure that bus access is
* Provide improvements to pedestrian and cycle links within and through the site to existing networks to help to connect the development to the surrounding area and encourage walking and cycling. Improvements to bus infrastructure, including future links to the bus network, may also be required.