

WRIGHT ENGINEERING

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Analysis of transport aspects of the Leeds City Council Site Allocations Plan and background transport documents relating to sites HG2-12, HG2-41, HG3-2, HG3-3 and HG3-4

Report prepared for Rawdon Greenbelt Action Group to inform their submission to Leeds City Council's consultation on the Site Allocation Plan Nov 15

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1. Introduction

Rawdon Greenbelt Action Group are concerned that the sites allocated for housing and safeguarded for housing development in the Rawdon area will further exacerbate existing unacceptable levels of congestion on the adjacent A65 and that local access issues in particular to site HG2-12 exist which would not be able to be overcome within the lifetime of the Leeds City Council Site Allocation Plan.

It is noted from the Leeds City Council highway comments on the Plan assessments that development of the sites would be contingent on local access improvements and on wider improvements to the A65 which is currently highly congested.

2. Site Access Issues

Leeds City Council highway comments highlight the following access and congestion issues:

HG3-3: Could be developed on its own without other sites due to frontage with Knott Lane good. May require junction works with A65. **Local congestion issues.**

HG3-2: If developed, this would need to be along with HG3-3, the sites would need to jointly provide a realignment of Knott Lane to provide a 90 degree approach to the A65. **A65 congestion issue.**

HG2-12: If developed, this would need to be along with HG3-2 to allow Knott Lane to be improved and access taken through this site. Improvements required to Knott Lane and A65 junction. New York Lane is unsuitable to provide vehicular access, access on to Knott Lane is only possible if combined with Woodlands Drive (which is a private road), but visibility would be substandard. **Knott Lane is currently barely suitable for additional development. Knott Lane / A65 junction alignment is poor for additional development.**

HG3-4: Frontage with side road off Layton Lane, possible junction works with A65 Adopted spur road between 24&26 Layton Lane is wide enough to create access to the site, access also available between 64&68 but is private. A single point of access would be adequate for the proposed level of development c100 units. **Local congestion issues.** Footways required on side road. Possible cumulative fund to Horsforth roundabout. **Possible access capacity works on A65.** Stand alone site.

HG2-41: Primary access to the site from a widened A65. **A65 / Ring Road congestion concern would require substantial works to Ring Road / A65 junction and widening of A65 along site frontage to provide right turning and public transport improvement.**

The SAP assessments conclude that sites HG3-2, HG3-3 and HG3-4 should be safeguarded for development beyond the current plan timescales (2028) whilst sites HG2-12 and HG2-41 are proposed for inclusion in the sites allocated for housing. The sites are currently classified as greenbelt.



The extract from the Leeds interactive map above shows the difficulty of access to site HG 2-12. As highlighted by the city councils assessment, summarised above, there is no existing public highway access to this site. Land from site HG3-2 or HG 3-3 are highlighted as being required to create a new access or re-align the existing Knott Lane / A65 junction to create adequate width and visibility for the increased traffic, but these are not currently allocated for development and it is intended that they are safeguarded until 2028. Improvements to Knott Lane are also specified as being necessary and it is not clear

- a) whether these are feasible within the existing highway and
- b) where sufficient width within the site for an access to HG 2-12 from Knott Lane would be found.

Paragraph 2.2 of the transport appendix highlights that no sensitivity tests have been undertaken around the delivery timetable of these works. Only high level, strategic issues are dealt with at this stage (para 2.3) leaving the problem of how to deal with this additional traffic in the immediate vicinity of the developments until later. That is to say that whilst it is highlighted in the Site Allocation Plan assessments for these sites that local access improvements would be required, it is not yet known whether these improvements would be feasible. We would argue that it is incumbent on the council to prove that there is a feasible local access solution before allocation for housing can be considered, especially since it is being allocated away from existing greenbelt.

3. Local Network Issues

Current congestion on A65

It is clear to those on the ground that the A65 adjacent to these sites is currently highly congested and this is evidenced in paragraph 4.12 of Appendix 3: Transport Background Paper where the A65 (between Rawdon and the Inner Ring Road) is highlighted as being amongst the highest levels of peak congestion, adding more than 100% to journey times inbound on the am peak.

High modal share of car journeys in locations like this

Whilst public transport options (principally bus) are available and improving from this area to the city centre, it is likely that the majority of residents choosing to live in a location such as this would not work in the city centre. Para 4.8 evidences this; “Within Leeds District 20% of residents either work at/from home or stay within their own ward; 18% work in the City Centre. A very significant proportion therefore are travelling either to another ward within Leeds or outside the District. Catering for these journeys by sustainable modes is challenging and this is reflected in the high car mode share for these trips (75%).” And 5.5 “For travel to work the diversity of destinations outside the City Centre makes it hard to cater for direct travel to these locations by public transport (unless residents live on the route of a direct bus or train service) and therefore it is important that they are linked directly to major public transport interchanges (such as the City Centre) to facilitate these journeys. This is reflected in the Accessibility Standards in the Core Strategy. It is nevertheless recognised that for many people car will remain the primary mode for a high proportion of these journeys and therefore the provision of additional orbital highway capacity will be a key outcome of the strategy.”

62% of residents are likely therefore to work in a place not accessed directly by public transport. Needing to go into and out of the city centre or change modes to reach a destination is a significant deterrent to using public transport, which will create low uptake of sustainable travel options from these locations.

Transport interventions difficult at very constrained site

Transport interventions planned in the area include a link road to the airport to support airport expansion, improvements to Horsforth roundabout and an increase in the orbital capacity of the ring road.

The airport link-road, if delivered, would not as currently planned alleviate the congestion on the A65 / A1620 Horsforth roundabout. Indeed, that the road is thought to be needed is an indication of further expected rise in traffic levels along the length of the A65 adjacent to the proposed sites which would be expected to make congestion worse.

As of late October, the signalisation of the A65 / A6120 junction has been completed. This work was designed to address existing, not future, congestion. The modelling work done using the Leeds Transport model on future traffic levels ranks the A65 / A6120 junction as the 7th most congested hotspot in Leeds and therefore in need of significant further work should the planned developments be progressed.

Signalisation of the junction allows timings to be adjusted to prioritise certain routes over others. It is clear from the transport paper that one of the current objectives is to increase the speed of traffic travelling around the ring road. If implemented, this may further increase queuing on the A65 north of the Horsforth junction.

Alongside this, the A65 / A6120 junction is noted as a very constrained site with reasons including “the location of housing and a petrol filling station on the A65 limits the scope for enhancement” and “there are building or engineering / environmental constraints which make it quite uncertain whether an improvement is deliverable”.

This casts serious doubt on whether the junction can be improved soon enough to meet the housing distribution requirements under Spatial Policy 7 (Core Strategy) and fulfil the Site Allocations in Horsforth and Aireborough HMCA.

Again, is it not incumbent on the council to prove that there is an economically feasible solution to the congestion problems on the A65, taking account of wider network issues, as part of preparing this plan? The hotspot analysis outlines that there are constraints which make it quite uncertain whether an improvement is deliverable!

4. Not compliant with NPPF

In our view, these plans are not yet prepared to the standard of NPPF which requires, in paragraph 32, that plans and decisions should take account of whether safe and suitable access can be achieved to the site for all people and improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Therefore these site allocations are not compliant with NPPF.

5. Conclusion

In conclusion, using the council's own evidence from the site allocation plan and the infrastructure background paper we would be concerned that there is insufficient evidence to justify these site allocations to housing due to the following transport constraints:

- 1) There is no feasible solution proposed for accessing site HG2-12.
- 2) The arterial road (A65) is already greatly over capacity and does not accommodate existing traffic acceptably, let alone have space for additional traffic.
- 3) Further improvements to the A65 / A6120 junction are shown to be essential if development is not to further increase travel times on the already highly congested A65 between Rawdon roundabout and the inner ring road.
- 4) Despite improvements being shown as essential, the A65 / A6120 junction is noted as being a very constrained site and it is unlikely that a comprehensive solution to accommodating additional traffic will be found.
- 5) If the airport expansion were to be permitted, further traffic would be generated on this already congested stretch of the A65.
- 6) Traffic analysis shows a likely reliance on the car for the commuting journey of 75% in locations like Rawdon, meaning uptake of sustainable travel choices will be low due to the nature of the location.

Based on the above, the site allocations along the A65 in Horsforth, Rawdon and Aireborough are potentially unsound as they are unsustainable on transport infrastructure grounds and therefore unjustified. More work is needed to show feasible solutions to network congestion issues on the A65 and local access solutions, particularly to site allocation HG2-12. There are currently too many questions about the feasibility and deliverability of mitigation measures identified. In addition, the site allocations are not compliant with paragraph 32 of the NPPF.

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