Dear Fiona Waye,

SKDC SAP – COMMENT ON ADDITIONAL STATEMENT – SES7(iii) – MOUCHEL FOR LINCOLNSHIRE CC

Our Chamber has in its representation made on 18th November 2011 and Additional Statements of 19 October 2012 set out much detail related to matters the subject of comment in the Mouchel Additional Statement for Lincolnshire County Council SES7(iii).

We respond to the matters raised by Mouchel as follows:

Issue: Different levels of development have been applied to the three urban extension sites tested, thus the sites have not been assessed nor can they rightly be compared on an equitable basis. (Page 1; Section 2; Para 2)

Mouchel’s response to this issue appears to confirm that the comparisons of traffic flows carried out by Jacobs were not undertaken on a ‘like for like’ basis. Mouchel then fails to justify the Jacobs comparisons.

In our Chamber’s view comparisons can only be valid and accurate if they are made on a ‘like for like’ basis.

JMP’s comparison of all sites on a ‘like for like’ basis with a fixed number of houses and with a fixed area for employment purposes, results in the summary table set out in our Chamber’s letter of 18th November 2011 at paragraph 6 on page 2. A copy of this page is set out at the foot of this letter to which the attention of the Inspector is particularly drawn.

In the fourth paragraph of page 2 of their additional statement Mouchel state that:

‘The JMP analysis shows that, directly comparing all the sites by assuming no additional infrastructure, the “East” site would have the most impact on traffic conditions, even with their preferred method of estimating trip generation. The JMP assessment shows that total travel time would increase by 302% should the “East” site be developed, rather than 271%, 249% and 252% for the other three sites.’

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As is made clear in the table the 302% figure results from a 'like for like’ comparison of development on the Newstead, West, Rutland and East sites without any new strategic highway infrastructure. As is stated in the table, this scenario is not proposed by our Chamber.

At para 6 on page 2 Mouchel raises the following issues:

‘Issue: It is quite clear from the model output statistics that all the future development scenarios tested will considerably worsen the traffic congestion problems that the report acknowledges already exist in Stamford’ (Page 2; Section 2; para 6)

Our Chamber considers this to be a self-evident truth without the need for any traffic modelling, unless additional infrastructure is provided in mitigation.

Our Chamber knows as a result of FoI information that the Lincs CC’s expensively funded Jacobs traffic model has never been used by the County Highways for its intended purpose. This purpose was to model the effects of our Chamber’s very long standing proposals for new highways around Stamford as part of the County’s LTP2 commitment. Thus County Highways can be seen to fail yet again on their duties to Stamford.

Meanwhile SKDC sought data from the County on the traffic related impacts of SUE sites. The Mouchel work is as biased and unfit for purpose as was the Jacobs Report before it.

We invite the Inspector to consider these points.

Yours sincerely,

Eg. Gilman

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5. Considering the overall economics of the Stamford Ring Road:
   a. The total cost of the Ring Road is estimated at £19.792m at 2011 prices. Please see APPENDIX B2.
   b. The total area of lands in close proximity to the Ring Road and which can as a result of the Ring Road be made available for development to pay for the Ring Road is between 130ha and 170ha depending upon which route is chosen for the Northern Link of the Ring Road. For the current purposes, let us take the figure of 150ha of land. Please see Appendix A overprint 3.
   c. So the financial contribution required to pay for the Ring Road is £132,000 per ha of lands made developable, omitting contributions from Community Infrastructure Tariff (CIT) from any urban re-development within existing Stamford boundaries.
   d. Assuming only 50% of the lands are used for housing and at a low density of 30 homes per ha, the capacity of the lands made developable is for up to 2,250 houses.
   e. The equates to the cost of the Ring Road being less than £9,000 per house assuming the housing pays for all the Ring Road costs.

6. The reduced congestion afforded by the various components of the Stamford Ring Road, but excluding the Ring Road’s Northern Link, can be tabled in a very abbreviated manner from data set out in the JMP Consultants 2011 Interim Report. Please see Appendix B0.

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Total Travel Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>604.6</td>
</tr>
<tr>
<td>2026 urban re-development only - no Ring Road</td>
<td>1542.1 (255%)</td>
</tr>
<tr>
<td>2026 TEMPRO normal growth only - no Ring Road</td>
<td>1701.6 (281%)</td>
</tr>
<tr>
<td>2026 urban re-development + ‘Newstead’ - no Ring Road</td>
<td>1639.7 (271%)</td>
</tr>
<tr>
<td>2026 urban re-development + ‘West’ - no Ring Road</td>
<td>1504.2 (249%)</td>
</tr>
<tr>
<td>2026 urban re-development + ‘Rutland’ - no Ring Road</td>
<td>1526.4 (252%)</td>
</tr>
<tr>
<td>2026 urban re-development + ‘East’ - no Ring Road Link - not proposed</td>
<td>1826.7 (302%)</td>
</tr>
<tr>
<td>2026 urban re-development + ‘East’ + Ryhall Road Link (RRL)</td>
<td>1731.4 (286%)</td>
</tr>
<tr>
<td>2026 urban re-development + ‘East’ + RRL + Wothorpe Link (WL)</td>
<td>1724.9 (285%)</td>
</tr>
<tr>
<td>2026 urban re-development + ‘East’ + RRL + WL + Burghley Link (BL)</td>
<td>1664.5 (275%)</td>
</tr>
<tr>
<td>2026 urban re-development + ‘East’ + RRL + WL + BL + 2nd Town Bridge</td>
<td>952.7 (158%)</td>
</tr>
</tbody>
</table>

   a. This table shows that for any of the three urban extension site considered in the DPD (‘Newstead’, ‘West’ or ‘Rutland’) there will be a very major and unacceptable increase in travel time because no additional road infrastructure has been included in the DPD, excepting estate roads. This ‘Do Nothing’ DPD will result in gridlock in Stamford.
   b. However, a solution is to hand and the DPD’s deficit in new road infrastructure can easily be remedied. By selecting our Chamber’s ‘East’ urban extension site instead of any of the three urban extension sites considered in the DPD. The ‘East’ site includes four of the five components of the Stamford Ring Road proposed by our Chamber (i.e. excluding for the time being the fifth component, the Northern Link. If the DPD adopted this ‘East’ proposal, considerably better travel time would result, bringing them by 2026 to the still high but acceptable level of 158% of 2009, but with network speeds as in 2009.
   c. This travel time data includes no allowance for the beneficial effect of the ‘East’ site’s easy walking distance to well used destinations in Stamford, reducing car travel.
   d. Detailed data in the JMP 2011 Interim Report show this proposal reduces very considerably the traffic queues on Stamford Town Bridge across the River Welland, as a result of the 2nd Town Bridge which forms part of the Ring Road. Please see Appendix A overprint 6.
   e. The four components of our Chamber’s Stamford Ring Road to which we refer are collectively called “the Stamford Eastern Relief Road”. The fifth component is the Northern Link which closes the loop in the Ring Road, making the Ring.
   f. If it is considered appropriate in a future DPD to increase the scale of urban extensions of Stamford by up to 2,250 houses, development in close proximity to the final Northern Link of the Stamford Ring Road should provide the additional road infrastructure which may balance the resulting increase in traffic and hold travel times. This expectation has not been examined by SKDC’s Jacobs Report, nor yet by the JMP 2011 Interim Report.

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