

Cheltenham Local Plan Examination Matters 8: Transport Gloucestershire County Council Position Statement



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Date: 23 January 2019

Dear Ms Smith,

CHEL TENHAM LOCAL PLAN EXAMINATION MATTERS 8 : TRANSPORT

This statement provides Gloucestershire County Council (GCC)'s position with regards to the "Inspector's Matters, Issues and Questions" received on 20th December 2018, (Matter 8: Transport) [ED009], in relation to the soundness of the Cheltenham Local Plan. It has been prepared for the purpose of informing the planned Examination Hearing Session scheduled for 28th February 2019, as identified in the draft hearings programme [ED008], and addresses a number of questions and issues (five) raised in highways terms, in light of the inspector's request, with the aim of facilitating a more efficient Examination in Public (EiP) process.

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Inspector's Matters for Discussion - Matter 8: Transport

Key Issues 1 To what extent has the impact of proposals within the CP been assessed in accordance with the package of key transport and highway improvements in both the local and strategic networks proposed to accommodate the proposals in the JCS?

GCC Position –

In the opinion of the Local Highway Authority, to some degree the proposals within the CP have been assessed against the package of key transport and highway improvements required to accommodate the JCS proposals (generally referred to as Do Something 7 (DS7) in the JCS transport evidence base). The assessment is referred to as the DS7 Sensitivity Test in the supporting CP Transport Assessment - Phase 1 Report [EB003].

However, there are flaws in the way the impact has been assessed which results in a potential over estimation of background growth. This is due to the carrying forward of certain necessary assumptions made at the time of the JCS DS7 model testing exercise required to take account of the identified housing need which would be met by the CP within the context of the overall JCS projected housing allocations. At the time when the traffic modelling exercise was undertaken in support of the JCS evidence base, only 3 specific non-strategic sites were identified within the CP area (Lansdown, North Place and Portland Street and Prestbury Road) with the remainder of the CP development related traffic growth associated with the smaller sites spread evenly across the Cheltenham highway network area.

The CP now identifies the site locations for all of the local plan allocations and so therefore the resultant traffic distribution pattern could differ (albeit marginally) from that assumed at the time of the traffic modelling undertaken to inform the JCS evidence base. Also, from a review of the analysis presented in the CP Transport Assessment - Phase 1 Report [EB003], while it is noted that the 3 non-strategic sites specifically identified at the time of the JCS

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evidence base were removed from the total trip demand before adding the current information on CP allocations, no deduction was made for the remainder of the small site allocations which had been assumed for the Cheltenham area, with the conclusion that in the CP modelling there is now a potential for over estimation of background local plan growth.

Although having been invited to the initial project inception stage for the CP traffic assessment modelling exercise, GCC officers were not directly involved in reviewing the ongoing modelling work / assessment outcomes or in progressing the CP transport evidence base.

It is noted that the JCS evidence base 2031 'Do Minimum' model and 'Do Something' model (scenario DS7) have been used to support the development of the CP. The modelling exercise has been undertaken in two phases. Phase 1 identifies junctions on the highway network where traffic impacts caused by the proposals for new development in the CP might be significant. Phase 2 investigates the potential mitigation strategies that may be required as a result of these developments. The modelling works were documented and named as CP 'Transport Assessment - Phase 1 Report' [EB003] and 'Transport Assessment - Phase 2 Report' [EB004].

The 'Transport Assessment - Phase 1 Report' [EB003] provides the model results of those junctions impacted by the CP proposals based on the JCS 2031 DM. It also describes a sensitivity test whereby the JCS 2031 DS7 was taken as a base reference to identify the differences between the JCS assumptions and the CP allocations. The 'Transport Assessment - Phase 2 Report' [EB004] presents the comparison of a 'with CP development' scenario, known as 'Do Something (DS)', against the 'without CP development' scenario, known as 'Do Minimum (DM)'. It is of concern that in this case the DM scenario was not assumed as a modified DS7 scenario. In the Phase 2 Report, both scenarios assess the traffic impact of the Cheltenham Plan allocations on the 2031 DM highway network,

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disregarding the network mitigation measures identified and included within the JCS DS7 scenario.

In summary, the impact of proposals within the CP has been assessed taking the JCS DS7 scenario into consideration, but only as a sensitivity test within the 'Transport Assessment - Phase 1 Report' [EB003]. However, in the 'Transport Assessment - Phase 2 Report' [EB004] the network mitigation schemes included in DS7 have not been considered when assessing the impact of the CP. It is therefore considered that further modelling work should be completed where the package of transport and highway improvement, if any, are explored in addition to those already identified in the JCS evidence base.

Key Issues 2 Do the proposals for new development in the CP comply with scenario DS7 in the evidence base to the JCS?

GCC Position –

In the opinion of the Local Highway Authority, whilst the proposals in the CP comply with the assumed level of growth used in the JCS DS7 evidence base, the spatial distribution of this growth as now presented differs from the original JCS assumptions, in that the CP now includes details of the site locations for these local plan allocations; such spatial location information was unknown at the time of the review of the JCS evidence base. However, the DS7 sensitivity tests undertaken in the 'Transport Assessment - Phase 1 Report' [EB003] do indicate that the spatial distribution of these specific local plan sites does result in a transport impact at the Old Gloucester Road / B4063 junction which would require mitigation.

In the 'Transport Assessment - Phase 2 Report' [EB004], the modelling assessment carried out a comparison of a 'with development' scenario, known as 'Do Something (DS)', against the 'without development scenario, known as 'Do Minimum (DM)'. However, both scenarios

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assessed the traffic impact of the CP allocations on the JCS 2031 DM highway network, disregarding the network mitigation measures identified and included within the JCS DS7 scenario.

In conclusion, the evidence base to support the CP contains is flawed in that the transport impacts were not accurately assessed. It is considered that the Phase 1 modelling work should clarify / rectify the methodology used and expand the modelling outcomes to identify if and/or how the sites now identified in the CP result in different or additional transport impacts to those already identified in the JCS evidence base. The Phase 2 modelling work undertaken to date is incomplete in that the traffic impact of the local plan allocations have been determined based on the existing highway network, and should investigate/clarify the transport mitigation measures, if any, to accommodate the site-specific development in the CP in addition to DS7.

Key Issues 3 Does the CP include policies which adequately manage the delivery of development so that severe transport impacts do not arise?

GCC Position –

Only draft policies HD7 and HD8 within the CP refer to the need to assess impact and identify measures to mitigate the traffic impact of the sites covered by these policies, in relation to Priors Farm Fields and Old Gloucester Road respectively. The need to assess the individual impacts of other new developments (whether employment, mixed use or residential) on the transport network is not implicit in the draft policies. The 'omission' of the need to assess impact and identify measures in terms of site specific policies for the other sites could be interpreted as implying that any such impacts have already been fully

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assessed at the plan making stage and that suitable mitigation measures have been identified, are capable of implementation, costed and possible funding sources identified.

Policy INF1 in the adopted JCS 2011-2031, as set out below, does go some way to ensure that the delivery of development can be managed through identifying and securing appropriate mitigation (and phasing). Although CBC have stated that the policies set out within the JCS will, by default, also apply to developments included within the CP, for clarity purposes it would be beneficial that mention be made in the CP to the application of Policy INF1 to all non-strategic allocations, as well as strategic sites.

Policy INF1: Transport Network

1. Developers should provide safe and accessible connections to the transport network to enable travel choice for residents and commuters. All proposals should ensure that:

i. Safe and efficient access to the highway network is provided for all transport modes

ii. Connections are provided, where appropriate, to existing walking, cycling and passenger transport networks and should be designed to encourage maximum potential use

iii. All opportunities are identified and taken, where appropriate, to extend and/or modify existing walking, cycling and public transport networks and links, to ensure that credible travel choices are provided by sustainable modes

2. Planning permission will be granted only where the impact of development is not considered to be severe. Where severe impacts that are attributable to the development are considered likely, including as a consequence of cumulative impacts, they must be mitigated to the satisfaction of the Local Planning Authority in consultation with the Highway Authorities and in line with the Local Transport Plan.

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3. Developers will be required to assess the impact of proposals on the transport network through a Transport Assessment. The assessment will demonstrate the impact, including cumulative impacts, of the prospective development on:

a) Congestion on the transport network

b) Travel safety within the zone of influence of the development

c) Noise and/or atmospheric pollution within the zone of influence of the development

4. Where appropriate the local planning authority may require applications to be accompanied by a Travel Plan that has full regard to the criteria set out in the NPPF.

This policy contributes towards achieving Objectives 1, 2, 3 4, 5, 6, 7 and 9.

However, GCC do not consider that the current transport evidence needed to support the CP is sufficiently robust and that, as a result of required further modelling, further site specific policies may be required to limit the significant impacts of development until such time that certain mitigation measures (whether already identified in DS7 or which could be identified as a result of further transport modelling work to support the CP) have been implemented.

As described above, the highways modelling carried out as part of the JCS evidence base included all of the 'as then' assumed CP development growth. The package of key transport and highway improvements in both the local and strategic networks tested in JCS DS7 are designed to be capable of delivering all of the local need up to 2031.

In addition, in the evidence base to support the CP, the 'Transport Assessment - Phase 2 Report' [EB004], modelling work is currently considered inadequate in that the traffic impacts have been identified but the package of mitigation measures, if any, have not been explored.

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Key Issues 4 Does there need to be any assessment at the time of submission of relevant planning applications to determine how much development may proceed in advance of the JCS highway interventions being in place? If so, does this need to be made clear in any relevant CP policies?

GCC Position –

Ideally, in the opinion of the LHA, to ensure that the projected housing trajectories are achieved, the assessment of how much development can proceed in advance of the JCS DS7 highway (and site specific) interventions should be determined in the CP. However, if such work is considered inappropriate at the local plan setting stage, it should be made clear to landowners and developers that whilst sites have been allocated, the evidence required to allow implementation would fall to them at the planning application stage, with a requirement for them to provide a robust Transport Assessment for each site, identifying traffic impact and determining the highway mitigation requirements in line with the JCS as the overarching development plan for the Cheltenham area.

Key Issues 5 Is the safeguarding of the former Honeybourne rail line (Policy TN)1 justified?

GCC Position –

As highlighted in the representations that were made (April 2018) in relation to the Pre-Submission Reg. 19 consultation, GCC's view is that this is a vital corridor which currently provides a spinal traffic-free section of the National Cycle Network and the County Strategic Cycleway.

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Whilst the policy advocates its protection as a corridor, the qualities of this route can be eroded through poor development delivery onto its alignment, insufficient attention to issues of natural surveillance through development on its peripheries, and the quality and availability of lateral connections and routes. The role of the former Honeybourne Line route will strengthen and change as more trips occur to and from the west of the town, due to the proposed development outlined in the JCS. The importance of the former Honeybourne Line is also highlighted in the Local Transport Plan which identifies access improvements to it as a priority. Furthermore the Local Transport Plan contains policies that recognise the importance of safeguarding quiet cycle routes to provide safe cycle linkages and the need to remove barriers. Not safeguarding the Honeybourne Line may lead to prejudicial development that creates a barrier to safe, off carriageway cycling which is in contrary to the policy outlined in the Local Transport Plan.

The GCC recommendation therefore is that this policy recognises the importance of ensuring that new development should strengthen the route's qualities, and that opportunities to extend the route north eastwards to Bishop's Cleeve continue to be investigated.

Yours faithfully,



Jamie Mattock

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