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Highways Development
Management
Economy Environment and
Infrastructure
Shire Hall
Westgate Street
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10 February 2021
Your ref: 20/01069/OUT
Ask for: Stephen Hawley

Dear Lucy White

**TOWN AND COUNTRY PLANNING ACT 1990
(DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015
ARTICLE 18 CONSULTATION WITH HIGHWAY AUTHORITY**

PROPOSAL: Development comprising of up to 250 residential dwellings including provision of associated infrastructure, ancillary facilities, open space and landscaping, demolition of existing buildings and formation of new vehicular access from Harp Hill. Approval sought for means of access to site from Harp Hill with all other matters reserved for future consideration

LOCATION: Oakley Farm Priors Road Cheltenham Gloucestershire
GL52 5AQ

APPLICANT: Robert Hitchins Limited

Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure)(England) Order, 2015 recommends that this application be **deferred**.

The justification for this decision is provided below.

The applicant has provided a TA Addendum (TAA) to which seeks to address the comments dated 17th August 2020. The Highway Authority remains concerned by this proposal and the addendum has not addressed the issues.

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The Highway Authority maintains the position that notwithstanding the TA scoping paper the fact that this is not a land allocation in the adopted Joint Core Strategy or Cheltenham Plan means that any development impacts have not been tested alongside the planned growth, therefore any proposal beyond that in the adopted plans must be tested over the cumulative impacts that are anticipated. At this time the JCS has a 2031 development timeframe, therefore this proposal must undertake an appraisal in a 2031 future year including the plan identified growth. The application proposes a 2024 appraisal and does not adequately account for that future growth. Therefore, the conclusions presented underestimate the impact on the highway network.

Response to specific points.

2. Immediate pedestrian / cycle access

The proposal shows shared use facilities but as the primary way in/out of the site and in the surrounding highway network. The application has also stated that it has considered LTN 1/20. The recent publication of LTN 1/20 (section 6.5) considers the use of shared use facilities. The LTN advises that shared use facilities should be regarded as a last resort and it details reasons why not least due to difficulties for visually impaired persons and the perception of safety for all users. Therefore, any proposal should account for this document and look to provide facilities which separate pedestrians from cyclists. The proposals on the existing highway network do not achieve this nor does the indicative connection within the site. The proposal therefore fails to provide safe and suitable infrastructure for all users.

3. Immediate Vehicle Access

The TAA provides additional tracking details. It remains the case that the design on the access is not suitable having large radii, excessive road widths and unacceptable gradient. The applicant has not had regard to how the design should reduce speed at entry, instead the proposal will result in a relatively high entry speed onto a setback pedestrian crossing point which would have little inter-visibility. The access does not conform with Manual for Gloucestershire Streets.

The gradient matter is to ensure that pedestrian, cyclists and particularly those with a disability do not have to endure long lengths of a steep slope. The applicant should note the requirement is published in Manual for Gloucestershire Streets as 1 in 12 should not exceed 30m in length, but there are varying guidance in documents such as MfS2, Inclusive Mobility and LTN 1/20. The application shows that there are gradients at the maximum permitted level on this site, it therefore is necessary for areas to be designed in to allow for less mobile people to rest or be provided with additional support. It is recognised that that the internal layout is a reserved matter but the information before us makes it a reasonable question to challenge if safe and suitable access can be provided for all users.

5 Off site vehicle mitigation

The applicant has provided further modelling to attempt to demonstrate that there is no severe impact at the junction of Priors Road/Harp Hill/Hales Road/Hewlett Road. The model has not been constructed in accordance with an agreed scope with the Highway Authority but a review suggested that the base model has been constructed in a suitable manner. However, the traffic count data and queue survey data has not been provided. It is also the case, as previously mentioned, that the assessment does not reflect the plan period and consequently nor does it address committed developments. Even with these omissions the outputs show that the development traffic resulted in increased queue lengths, this was an anticipated outcome and the

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same conclusion was shown in the junction 9 software. The applicant should also consider the extent of network delay as a result of this proposal as this data is not presented. This should all be provided for the 2031 future with and without any mitigation.

With regards to the other junctions referred to in tables 5.1 and 5.2, the addendum dismisses the impact on the basis of percentage impact and doesn't look at route choice through the junction, this is not considered to be a fair approach on a congested network and should provide their own junction analysis or microsimulation of the impacts.

6 Travel Plan

It is noted that the applicant has indicated that they wish to pay Gloucestershire County Council to implement and monitor the travel plan. This would need to occur over a longer time period given the likely build out rate of the site. As such a travel plan contribution of £64,500.00 would need to be paid through a planning obligation.

Additionally, the public transport officer has also commented that the site is outside the accepted 400m walking distance to bus stops identified as Priors Rd Oakley 'outside and opposite Sainsbury's' and Whaddon Road 'Community Centre'. These stops are of limited quality and lack shelters in some instances.

In terms of bus timetables, taking into account nearest bus stops, the Priors Rd P&Q timetables are extremely limited and not suitable for commuters. Service A 'Whaddon Road' is the more frequent route but appears residents have farther to walk in order to access. In conclusion for this site to be sustainable there would need to be a great deal of thought given towards bus service provision be that directly through the site or towards improving the existing Services P&Q with subsequent infrastructure improvements at the Sainsbury's stops.

The TA Addendum has not addressed the implications of the site on the transport network and fails to provide a suitable sustainable access strategy. Matters of gradient could potentially be addressed through more significant earthworks but at this time it is not clear that this the case and the gradients are excessive and consequently prohibitive to development. The applicant should provide a comprehensive addendum that addresses the above matters.

The Highway Authority therefore submits a response of deferral until the required information has been provided and considered.

Yours Sincerely

Stephen Hawley
Highway Development Management Team Leader

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