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Highways Development
Management
Economy Environment and
Infrastructure
Shire Hall
Westgate Street
Gloucester
GL1 2TG

1 April 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 is **refused**.

The justification for this decision is provided below.

The Highway Authority has previously recommended that this application be deferred on 2 occasions seeking further clarification on the assessment presented. The applicant has not engaged with the Highway Authority in order to address these

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issues before submitted further technical notes. Those notes do not address the concerns of the Highway Authority and the reasoning is listed below.

Network wide impact

The applicant has acknowledged the need to consider the impact with the Highway Authority's Saturn model, and now seeks to engage. Whilst this is welcomed the details on how to access this tool have been freely available for the duration of this applications consideration, therefore the applicant is able to commission such services based on the published guidance. It is essential that the applicant provides a suitable appraisal of this site alongside the anticipated local plan sites given it is not allocated and as such impact and infrastructure mitigation for this site has not been accounted for at this stage.

The TA Addendum looked at the percentage impact on some junctions and microsimulation.

Priors Road/Harp Hill/Hales Road/Hewlett Road junction.

Further information has now been provided on the use of the paramics microsimulation model. The conclusion remain the same that there is unacceptable impact which is considered to be severe. The micro simulation tool can help to demonstrate operation usage better than historic junction modelling tools, in the instance of this junction through the TA and TA Addendum both forms of assessment have been undertaken. Both tools focus on this junction and cannot consider any wider reassignment due to the scope of the assessment. Whilst the outcomes should be treated with caution both models show increased delay and queue length in the 2024 scenario and direct mitigation is not proposed.

Priors Road/Bouncers Lane and Presetbury Road/Tatchley Lane/Deep Street/Black smiths Lane Bouncers Lane junction

The applicant concludes that there is no detriment in 2024, as previously stated this does not capture the full plan period as therefore is an underestimation. The presented table 4 on these junctions does not include the resultant delay, when this is cross referenced again the originally submitted TA the result shows that whilst the queue length is shown to not being excessively long the resulting delay is significant.

A40 London Road / Old Bath Road / Hales Road

The additional technical note does not address this other than suggesting that there is little scope for improvement and suggestion of upgrading the controller unit. The TA demonstrates significant impact to this junction as a result of the proposal.

The applicant has suggested that the impact of COVID-19 would result in more flexible and Home working. Whilst this is one scenario the wider implication of the pandemic on travel patterns is not clear. As such reductions in traffic flow for this reason are not accepted.

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The TA, TA Addendum and technical note have not addressed the cumulative impact of development and future traffic growth for an appropriate future year. The implications of the development on the network are considered to be severe and consequently conflict with paragraph 109 of the National Planning Policy Framework.

Cycle Infrastructure

The Highway Authority has sought that the proposal complies with LTN 1/20. It is considered that this needs to be split in to the consideration of on site and off site works.

On site works would be a reserved matter and therefore it is not necessary to include this as a refusal point. I would however suggest that the applicant suggestion of a 3m shared facility is not acceptable as shared facilities are now considered to be a “last resort” option.

It has been suggested that offsite mitigation is a reserved matter and could be addressed later. This is not an accepted position. The offsite works would be mitigation to the direct implications of the proposal, should those works be delivered through a planning obligation it would have to be address at this stage, therefore it is illogical to conclude the means of delivery dictates the status of the consideration of the works. The detail around the assessment of needs and design has not been concluded and it is necessary to ensure that a safe and suitable arrangement is provided.

Immediate access off Harp Hill

This is a matter for consideration at this stage and therefore the suitability of the access needs to be resolved now. Previous comments raised concern about the access width, speeds, and tracking. In response the applicant has indicated that it design to accord with Manual for Gloucestershire Streets requirements, this is clearly incorrect and does not reflect the required standard. The access is excessive and does not convey a design that is conducive to safe and suitable active travel infrastructure. The access and initial street geometry do not reflect the local design guide and does not address the needs to pedestrians or cyclists.

The site gradient remains a concern. Whilst the internal streets are for future consideration the topography of the site provides significant challenges. The desired gradient is 1 in 20, and no steep than 1 in 12, the applicant has provided details of long lengths of 1 in 12.5. The intend of this gradient is to ensure that layouts are suitable for active travel and particularly for those individuals with protected characteristics. The Highway Authority has no confidence that the 1 in 20 gradient can be achieved and based on the information provided that short lengths be provided where it is steeper. As such it does not consider that a future proposal would be unable to achieve a suitable layout.

Travel Plan

The applicant has accepted the travel plan requirements and these need to form part of a suitable legal agreement. This appears to be accepted but no agreement exists at this stage.

Public Transport

Bus stop provision does exceed the nationally accepted thresholds. Therefore, in order to offset this it is normal for distance of up to 800m to be accepted where there are highway links and infrastructure. The applicant states that some stops are over 600, and 800m from the centre of the site, this will result in a significant number of households exceeding this upper threshold. Additionally, the route would need to be direct and be a pleasant environment. The applicant has already indicated that they intend to provide a shared walking and cycling environment which is not considered to address the needs for pedestrians or cyclists well. As such the distance to bus stops is unacceptable, the route as indicatively shown is unsuitable, and the stops themselves require enhancement. Mitigation of cycle stands at bus stops is unlikely to be a suitable outcome given the relatively short distances by bicycle and resulting multiple transport choices.

Conclusion

The application is considered to result in a severe impact on the Highway network which is contrary to paragraph 109 of the National Planning Policy Framework, it is also considered to conflict with paragraphs 108 and 110. It also conflicts with INF 1 and INF 4 of the Joint Core Strategy, LTP PD 0.3 and 0.4 of the Local Transport Plan, and Manual for Gloucestershire Streets.

The Highway Authority has undertaken a robust assessment of the planning application. Based on the analysis of the information submitted the Highway Authority concludes that there would be a severe impact and would conflict with the provision of safe and suitable access for all users. Therefore it is recommended that this application is refused.

Yours Sincerely

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Highway Development Management Team Leader

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