



TOWN & COUNTRY PLANNING ACT 1990: SECTION 78

APPEAL BY ROBERT HITCHINS LTD

LAND AT OAKLEY FARM, CHELTENHAM



PINS Ref: APP/B1605/W/21/3273053


LPA Ref: O20/01069/OUT

**SUMMARY OF EVIDENCE OF
G EVES BSc CEng MICE MCIHT**

AUGUST 2021

DOCUMENT CONTROL

Job No	H628		
File Reference	G:\workfiles\H628 OAKLEY FARM\REPORTS\H628-DOC05 PoE-Summary.docx		
	Name	Date	Initials
Prepared By	G EVES	10/08/2021	
Checked By	G EVES	10/08/2021	

Issue	Date	Comments	Approved
Exchange	10/08/2021	-	
			G EVES

This document has been prepared for the exclusive use of the client in connection with the project and, unless otherwise agreed in writing by PFA Consulting, no other party may copy, reproduce, make use of or rely upon its contents other than for the purposes for which it was originally prepared and provided.

Opinions and information provided in this document have been provided using due care and diligence. It should be noted and is expressly stated that no independent verification of any information supplied to PFA Consulting has been made.

Warning: This document may contain coloured images which may not print satisfactorily in black and white. It may also contain images originally created at a size greater than A4 which may not print satisfactorily on small printers. If copying is authorised but difficulty is incurred in reproducing a paper copy of this document, or a scaled copy is required, please contact PFA Consulting. Authorisation for reproducing plans based upon Ordnance Survey information cannot be given.

© PFA Consulting Ltd 2021



PAGE LEFT INTENTIONALLY BLANK

1. SUMMARY AND CONCLUSIONS

1. My name is Graham Eves. I hold the Degree of Bachelor of Science in Civil Engineering. I am a Chartered Engineer, registered with the Engineering Council, and I am a corporate member of the Institution of Civil Engineers. I am also a member of the Chartered Institution of Highways and Transportation.
2. My evidence examines the highway, traffic, road safety, and general sustainability implications of a development of up to 250 dwellings with vehicular access from Harp Hill, Cheltenham.
3. Following the agreement of a "Transport Scope" with Gloucestershire County Council (as the Highway Authority), a detailed Transport Assessment was undertaken. This examined the overall transport implications (highway capacity, traffic flows, road safety and opportunities to travel by means other than the private motor car) of the proposed development. Following the submission of that Assessment the Highway Authority raised a number of objections relating to the impact of the proposed development on the surrounding highway network and requested further information, in particular requiring an analysis of the operation of the highway network at an Assessment Year of 2031 (the original Assessment year identified in the agreed scope being 2024). This further analysis was provided by way of a supplementary Transport Note. The Highway Authority also raised concerns about the ability to achieve suitable footway/cycleway gradients within the site.
4. Having considered the additional analysis and information provided, the Council has continued to raise traffic and sustainable travel-related objections to the development which can be summarised as follows:-
5. The traffic impact on the Priors Road/Harp Hill/Hales Road/Hewlett Road junction, the Priors Road/Bouncers Lane junction, the Prestbury Road/Tatchley Lane/Deep Street/Blacksmiths Lane/Bouncers Lane junction, and the A40 London Road/Old Bath Road/Hales Road junction; together with the lack of suitable footway/cycleway gradients within the site.
6. Accordingly I have reviewed both the original and additional analysis and have identified that the Temprow growth used in the analysis is predicated on the basis of the Development Plan requirements/assumptions for future housing and employment. However, as Mr Tiley identifies in his evidence there will be a shortfall in housing delivery over the Plan period which means that the Temprow growth used in the additional analysis overestimates future traffic flows (by around 1/3rd). Accordingly my evidence considers a "more probable" estimate of future traffic flows.
7. Furthermore, the estimated future traffic flows and development traffic predictions do not reflect the changes in peak hour traffic characteristics which, in my opinion, will be a permanent consequence of the recent Covid restrictions, the recent innovative e-scooter scheme which is being trialled in Cheltenham and the efficacy of the proposed Travel Plan. All of these factors, will in my opinion, result in my "more probable" analysis being an overestimate of the traffic impacts of the development.
8. Notwithstanding this, the evidence that I have produced enables me to conclude that the impact of a development of up to an additional 250 dwellings on the wider highway network and the above junctions in particular, will be less than would occur if the Development Plan housing trajectory were to be realised in full and thus, in my opinion, is "not a severe impact" in the context of para 111 of the NPPF.

9. Whilst I acknowledge that the Highway Authority's witness Mr Hawley, may have a different opinion, even if a judgement is made that a trigger for 'severe' is reached, paragraph 111 of the NPPF does not require that permission must be refused but is simply a test for whether the development could be refused on highways grounds. In such circumstances the degree of harm is balanced against, and with, other transport and planning benefits and disbenefits.
10. In reality, once queues and delays become "unacceptably" long, this becomes a "stick" part of the "carrot and stick" approach to changing travel patterns and drivers will think twice about jumping into their cars for journeys which can be undertaken by other modes, or decide that the journey is simply not essential, or can be undertaken at a different time. Increased working from home, and flexible working hours, together with sustainable travel incentives such as the "e-scooter" scheme being trialled in Cheltenham, are examples of the "carrots" which form part of this approach.
11. The Travel Plan proposed to support this appeal proposal is part of the "carrot" and thus, in my opinion, the analysis of the operation of the various junctions represents very much an over-estimate.
12. All of these factors only reinforce my judgement that the impact that the development will have on the highway network cannot be described as "severe" in the context of the NPPF.
13. Whilst the internal access roads are for future consideration a gradient of 1 in 12.5 for residential roads (with adjacent footways) is acceptable within national guidance such as Manual for Streets 2. Local guidance should not be more onerous than national guidance.
14. Whilst there are sections of road at a 1 in 12.5 (8%) gradient, there are also sections running with the contours that will enable flatter gradients to be utilised to ensure suitable platforms for rest or for additional support for the less mobile. The footway routes through the POS areas also offer multiple opportunities to grade these paths at shallower gradients to offer alternative routes to those alongside the site access road.
15. Given the general topography of this part of Cheltenham, such gradients are not unusual and allow the efficient use of land for residential purposes.
16. I have identified appropriate mitigation measures which can be secured either by condition or by legal agreement and on this basis I believe that the proposal provides a sufficiently suitable and safe access for all users, and that overall there can be no highway/traffic related objections to the development.