

## **Draft response to TA for Land at Kidnappers Lane for Comment**

### **JCS Accessibility Analysis**

The TA correctly reports that the JCS clearly identified Leckhampton as having the lowest category of accessibility in the Cheltenham area, yet the TA seeks to suggest otherwise and identifies a few reasons why.

It is fundamental to this process that such an assessment is updated before any irreversible decisions are made.

### **Junction Analysis**

Throughout the report, it is acknowledged that additional analysis information will be made available once completed. No decision on the acceptability of the proposals can be made until such information has been presented.

The analysis presented in the TA reports that the following junctions will be operating beyond their operational capacity.

1. A46 Shurdington Road/Leckhampton Lane Priority Junction
2. A46 Shurdington Road/Woodland Road Priority Junction
3. A46 Shurdington Road/Moorend Park Road Signalised Junction

In summary, rather than focusing on any individual junction, what the analysis shows is that these junctions will, in 2023, be operating either in excess of their theoretical operational capacity or significantly in excess of their theoretical capacity in both the base and development scenarios.

Disappointingly, it has not been reported how these junctions currently operate so no comparison can be made with what is witnessed now this analysis should have been presented. Nevertheless, in simple terms, what this analysis clearly demonstrates is that the local highway network is, by 2023, significantly broken.

Furthermore, such significant capacity issues arise by 2023 that any further development should be restricted, but with no 2013 model or any interim models, at what point in time this might be, or how development numbers might be scaled back is not known.

Such information must be made available if a reasoned and quantified decision on the acceptability of the proposals presented in this TA and other proposals for the Leckhampton area is to be made. It is not acceptable just to say that the network is broken without knowing when.

One would have normally expected the TA to address the development's own impact, even if a junction is operating over capacity. Good practice would be to seek to bring the impact of the development back to the before development condition i.e.; nil detriment. No mitigation measures are proposed.

In addition to the above, all the analysis presented assumes that the SD2 and Brockworth developments go ahead. As an absolute minimum, a sensitivity test should have been undertaken assuming only background growth to 2023. The real impact of the development on the local highway network could then have been identified and mitigation proposed.

The reported traffic delays and queuing levels at these junctions should be further considered in terms of noise and air pollution and their impacts quantified.

### **Link Analysis**

Throughout the report mention is made of traffic conditions along the A46 quoting a 23% increase in traffic up to 2023. This is then highlighted via the presented junction analysis indicating that a number of junctions will be operating beyond their theoretical capacity. Given the significant level of impact the various developments have on the A46 corridor up to 2023, a full link analysis should have been undertaken.

Such an analysis would have assisted in understanding the volume of traffic expected to travel along the A46 during peak periods, what residual traffic might still be on the highway network outside the peak periods, how this might impact on the ability of buses to viably use this corridor, the impact on pedestrians, cyclists as well as noise and air quality.

Such information must be made available if a reasoned and quantified decision on the acceptability of the proposals presented in this TA and other proposals for the Leckhampton area is to be made

### **Vehicle Re-routing**

The TA reports on the use of a Saturn model to inform the TA process. However, it is well known that once links and junctions are at capacity such a model will seek to redistribute traffic to create a more balanced network.

No reporting on any vehicle re-routing is included in the TA and so concerns are raised as to whether vehicles have been modelled as re-routing through residential estates. Clarification on this point is sought.

### **Highway Safety**

Whilst highway safety has been considered in relation to the impact of the development over-and-above the baseline, no consideration has been given to the increase in traffic from 2013 to 2023.

Once again this is a vital piece of missing information. Such an analysis should be addressed during these years as it cannot be the case that such an increase in traffic will not lead to an increase in accidents.

Of course this is also a part of the bigger picture for development in this area, but without this information no sensible and qualified decision on the acceptability of either of these proposals or the overall quantum of development proposed for the area can be made.

Contrary to what the TA reports, Leglag commissioned an accident analysis which is appended to this letter. This report concludes that the present levels of traffic in Leckhampton, and particularly along the A46 Shurdington Road, lead to a significant number of injury accidents every year, and a fatality roughly every two years.

Once again this appears to suggest that the network is already at capacity and any increase in traffic along this network may have a significant effect on highway safety.

### **Pedestrians**

It is disappointing that a full walking audit to essential facilities has not been undertaken, particularly given the forecast increase in pedestrian movement resultant of the development proposals (4.7.8). As a very minimum, routes to schools should have been assessed against criteria such as footway width, condition, existing usage and the ability of the footpaths to cater for additional peak hour demand. Local observations indicate that they cannot and additional pedestrian traffic could result in more pedestrians being forced to walk in the road, or not being able to be accommodated at existing crossing locations.

Without a full pedestrian route capacity analysis a reasoned and quantified decision on the acceptability of the proposals presented in this TA and other proposals for the Leckhampton area cannot be made.

## **Public Transport**

The A46 is identified as a public transport corridor and one that might benefit from a park-and-ride facility.

Mention has been made of this in the TA, but states that the Council's study into the effectiveness of such a facility has not been completed. In addition the report suggests that the results of this study may require the submitted analysis to be reviewed.

Without completion of this report and additional analysis (if required), the viability and therefore the deliverability of such a scheme must be questioned.

## **Impact on the Strategic Road Network**

The submitted TA fails to deal with the impact on the strategic road network, only referencing on-going discussions (sections 1.2.3 and 6.6), this is a major deficiency in the report and makes the conclusions somewhat misleading.

Within this section of the TA, reference should have been made to DfT Circular 02/2013 'THE STRATEGIC ROAD NETWORK AND THE DELIVERY OF SUSTAINABLE DEVELOPMENT'

Key references in this document include;

*Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*

*However, even where proposals would not result in capacity issues, the Highways Agency's prime consideration will be the continued safe operation of its network.*

*The overall forecast demand should be compared to the ability of the existing network to accommodate traffic over a period up to ten years after the date of registration of a planning application or the end of the relevant Local Plan whichever is the greater. This is known as the review period.*

*The preparation and implementation of a robust travel plan that promotes use of sustainable transport modes such as walking, cycling and public transport is an effective means of managing the impact of development on the road network, and reducing the need for major transport infrastructure.*

None of the above has been addressed in the TA, which is a major omission. Until these issues have been satisfactorily addressed and reported accordingly (Section 1.2.3 advises that addendums will be produced), a decision on the acceptability of the proposals cannot be made.

## **Missing Information/Addendums being prepared**

- i. Measures for Leckhampton Lane
- ii. Paramics modelling and resultant discussions with the HA
- iii. Additional application area forecasting and modelling using 2011 census data
- iv. Report on Park-and Ride
- v. JCS traffic modelling

**Required Information to enable a Qualitative Decision on the Development Proposals to be made**

- a. Missing information identified above
- b. Junction mitigation proposals
- c. Link analysis
- d. Accident analysis
- e. Pedestrian capacity analysis
- f. Junction sensitivity testing
- g. Updated accessibility assessment
- h. Public transport viability assessment

## **Recent road accidents in the Leckhampton area involving injuries and fatalities.**

### **Report for Leglag, 18<sup>th</sup> January 2013, by C.M. Bell**

This report is based on detailed accident reports provided by the Gloucestershire County Council Accident Investigation and Prevention Section to Gerry Potter on 13/12/2012. The data on injury accidents covers the 10 year period between 1/01/2002 and 31/12/2011. Information on fatalities covers the 20 year period 01/01/1991 till 31/12/2012.

The area considered for injury accidents is bounded by:

- The A46 Shurdington Road-Bath Road between Shurdington and Thirlestaine Road
- Leckhampton Lane-Church Road
- Leckhampton Road

These boundaries enclose the areas under considered for protection by Leckhampton Green Land Action Group (LEGLAG).

### **Summary**

There were 123 reported injury accidents in the area under consideration in the 10 years between 2002 and 2011. Approximately 70% of the accidents occurred along the A46.

Number of accidents reported 2002-2011:

<b>Year</b>	<b>Number of accidents</b>	<b>Casualties</b>
2002	21	24 slight
2003	17	23 slight
2004	15	19 slight, 1 serious
2005	10	12 slight, 1 serious
2006	13	14 slight
2007	12	18 slight
2008	9	9 slight, 1 fatal
2009	8	6 slight, 2 serious
2010	9	7 slight, 1 fatal
2011	9	6 slight, 3 serious

7 accidents involved serious injury and two involved fatalities. 21 of the 147 casualties were pedestrians, 15 were cyclists and 15 were motorcyclists. The report does not state whether the decrease in the number of accidents and casualties was due to differences in the methodology of reporting or to an actual decrease in the numbers.

There were 59 injury accidents on the A46 between Shurdington and the Norwood roundabout and 28 on the Bath Road between the Norwood Arms roundabout and Thirlestaine Road.

#### **Blackspots on the A46 were:**

Shurdington Road-Leckhampton Lane junction (Bell pub), 14 accidents

Morrison's roundabout, 4 accidents

Woodlands Road turnoff, 5 accidents

Moorend Road traffic lights, 12 accidents (note this junction has been upgraded)

Norwood Arms roundabout, 9 accidents (note this junction has been upgraded)

Bath Road (Norwood Arms to Thirlestaine Road), 28 accidents

#### **Blackspots on the Leckhampton Lane-Church Road were:**

Shurdington Road-Leckhampton Lane junction (Bell pub), 14 accidents  
Farm Lane-Crippetts Lane, 6 accidents  
Leckhampton Road-Charlton Lane intersection (double mini-roundabout), 5 accidents

### **Fatalities**

There were 9 fatalities in the area under consideration and in the immediately surrounding roads in the 20 years between 1991 and 2012. This is approximately one every two years.

08/01/1991	Pedestrian in Bath Road
15/03/1997	Driver and passenger, junction of Farm Lane and Leckhampton Lane
14/11/1997	Driver on A46 near Hatherley Cricket Club
28/10/1999	Cyclist between A46 roundabout and Morrison's Supermarket
23/10/2007	Driver Naunton Lane
04/11/2008	Pedestrian A46 near Hatherley Cricket Club
01/02/2010	Cyclist Leckhampton Road
04/12/2012	Cyclist/pedestrian A46 Shurdington

### **Conclusions**

The present levels of traffic in Leckhampton, and particularly along the A46 Shurdington Road, lead to a significant number of injury accidents every year, and a fatality roughly every two years. The proposed residential development in this area would produce a large number of extra car movements which would need to be controlled and carefully managed.