

**Land at Kidnappers Lane, Leckhampton,
Cheltenham, planning application reference 13/01605/OUT**

In considering this application, it is imperative that consideration is given to both the macro as well as the micro implications of development across Cheltenham as well as local to the site.

General Cheltenham Wide Traffic Conditions

The traffic modelling that supports the application advises that by 2023 traffic conditions in across Cheltenham resultant of all development proposals will increase;

1. The number of over capacity queues at junctions by 1000% (150 to 1,500)
2. Total travel time by 40%
3. Total distance travelled by 20%.
4. Transient queues by 60%

Quite simply, the queues will get a lot longer as will journey times. At what point does this stop, it is quite clear from the modelling that a significant number of roads and junctions across Cheltenham will suffer from stifling and unsustainable levels of congestion.

Local Traffic Conditions related to the Application Site

The development of 650 houses off Shurdington Road will, as stated in the Highway Officers response;

1. Increase traffic delays at all local junctions
2. Result is a significant traffic redistribution pattern or in other words, increase in rat-running

The Highway Officers report states that none of the above can be categorised as being 'serve' and therefore do not fail the tests set out in the NPPF. However, this is on the premise that the Travel Plan measures proposed by the developer are 100% successful, not 50%, 100%. This is an admirable goal but one that is unlikely to be achieved. It is not clear whether the modelling and therefore junction analysis was based on TRICS data or manipulated TRICS data to reflect a modal shift. In this regards, a development scenario based on the Travel Plan measures and therefore modal shift targets only partly being reached should have been undertaken in order that such a situation could be considered. Without this analysis, only half the picture is being presented.

The ES rates the impact of the development under all tests as being "minor impact or significance" yet the impact on Kidnappers Lane ranges from 17-29%. This is significant. In this regard therefore, the accuracy of the analysis is questioned.

Further concerns are raised at section 3.8.9 of the TA addendum that states;

"The only roads on the approach road network near the development site which are forecast to have flows which could give rise to fear and intimidation are Shurdington Road and Up Hatherley Way. On both of these roads the average hourly flows over an 18 hour day are within the moderate degree range with baseline flows and flows with development. The total 18 hour HGV traffic on both roads is forecast to be below 300 vehicles. This falls below the threshold for links that may give rise to fear and intimidation. On no other road near the development does the average hourly flow over an 18 hour day reach the threshold for moderate degree of impact."

Shurdington Road carries more than 300 vehicles per day; the accuracy of the analysis is questioned.

The EA Addendum at 3.10.35 deals with Leckhampton Road/Church Road/Charlton Lane Double Mini Roundabout and considers the development impact to be a minor impact of moderate significance. It is considered that resultant of this, the development proposals fail the tests set out in NPPF and CBLP Policy TP1.

Despite the above, the ES suggests that there will be no impact on highway safety, the accuracy of this statement is strongly questioned. The Non-Motorised User Audit presented as part of the TA addendum is welcomed. However, two matters arise from this audit. Firstly, there has been no quantification of footway capacities and whether the additional pedestrian traffic will result in footways operating beyond their means, therefore requiring pedestrians to use the road.

This analysis should be provided particularly at signalised crossing points on school routes, as visual evidence suggests that these crossing points and associated central islands cannot cope with demand at present, with pedestrians either waiting on the road or crossing between moving vehicles. Secondly, this assessment illustrates that despite a number of measures being introduced a significant number of pedestrian and cycle deficiencies will remain. As a result, it is considered that these deficiencies mean that the development proposals fail the tests set out in NPPF and CBLP Policy TP1

This situation must be given serious consideration and weight, especially given that the site relies heavily on achieving an increase of pedestrian and cycle traffic to reduce its vehicular impact on the local highway network. Obviously, if the infrastructure is not in place then the modal shift will not be achieved and in particular school related pedestrian and cycle traffic will be further endangered by the increase in vehicular traffic.

Unless the acknowledged infrastructure is in place, the safety of pedestrians and cyclists remains a major concern and therefore the application is considered to be contrary to NPPF para 32 and CBLP Policy TP1.