

# TRAFFIC EVIDENCE TO INSPECTOR ORD

The Reddings Residents' Association offer the following concerns and comments in relation to the JCS Transport Strategy Evidence Base.

## Introduction and Overview

1. There are multiple issues around our concerns and comments which we will try to set out in the most logical and succinct order.
2. The Reddings area has been the subject of much development since 1998, over 1000 new houses, a Travelodge, Harvester, KFC drive-through takeaway, an Asda superstore, offices, Nuffield Hospital, BMW, B&Q, Pets at Home and Home Bargains. Well over £2 million has been paid in Section 106 monies and no improvements have been made whatsoever to the local area save for a small patch of tarmac repair. During the past 20 years, the original semi-rural location has lost much of the green open space and its amenity value to these developments. Current applications include for an as-yet unbuilt B1 business park adjacent to BMW JCS site E3 (16,600m<sup>2</sup> - which the developer now wishes to vary to a hybrid retail and B1 offering) and a 110 bedroom care home which has just been approved within historic woodland belonging to Arle Court Manor/Manor by the Lake. Within the last 6 months an inspector appeal, has granted permission to vary B1 land to build 27 houses on the basis that over a sustained 3 year period, the developer could find no interest in B Class development. Over this 20 year period, there is now considerable traffic congestion in the area. Residents that live close to Hatherley Lane and Grovefield Way are complaining of regular fume smells. Air monitoring has been requested from Cheltenham Borough Council, but the request has been denied. We have evidence that traffic congestion is causing dangerous U-turn manoeuvres to be undertaken on Grovefield Way. Local traffic is diverting to other local roads, in order to avoid the congestion. Park and Ride buses regularly use the local roads, because they cannot access the A40. Similarly, The Reddings/Reddings Road is now a regular emergency service route for vehicles travelling at high speed through a residential area where children are playing and the elderly are crossing and there are regularly parked cars causing visual obstructions for pedestrians. There have been historic design attempts at implementing traffic calming measures to mitigate the significant increases in traffic from out-of-area "rat running". However, as The Reddings/Reddings Road is the main arterial collector road for the area and is used by the double deck buses that service the 97/98 bus route (which we note it is proposed to promote as a part of the JCS Transport Strategy scheme ref: 55), GCC Highways had to abandon their entire proposal for traffic calming measures in 2012 in the Hatherley and The Reddings areas when they were proven to be entirely inappropriate. No alternative scheme has ever been presented. Details of the history of the area can be found in TRRA's report; "A Planning History of the Development Land at Grovefield Way and North Road West – an independent assessment of the history, decisions and consequences" in the following link.  
<https://www.dropbox.com/s/v60w2putkprz7aj/1602208FUL%20-%20Reddings%20Resident%20Association%20-%20Objection%20Report.pdf?dl=0>
3. Grovefield Way was originally constructed as a gyratory road to alleviate local traffic from The Reddings. It was stipulated that there could be no entrances on, or off, the road. North Road was bisected into North Road East and North Road West and no entrance or exit was permitted onto Grovefield Way from North Road East in perpetuity. Over the past few years, this "no junction" undertaking has been broken with direct access now being gained onto and off the road with the BMW development and the permissioned B Class employment land (JCS site E3).

### 3 Continued

Slightly further up the road, a 370 dwelling development was constructed on the former M and G playing fields and also has direct access onto and off the gyratory road.

4. During peak A.M. and P.M. periods, and lunchtime periods, traffic is frequently backed-up from the A40 Arle Court roundabout (ACR) to the B&Q roundabout and along much of Grovefield Way and Hatherley Lane, where the two roads, the Park and Ride and the nearby business premises all merge. Traffic for the ACR is forced into a narrow one lane portion, opening to a three-way junction on Arle Court roundabout (ACR). However, there are no traffic light controls for the three lanes to gain entry to the ACR. Traffic therefore locks along Hatherley Lane, Grovefield Way and back up to the roundabout at either end of The Reddings/Reddings Road. If more traffic is routed into the area and the roundabouts at either end of The Reddings/Reddings Road become blocked, all of the residential roads that feed onto these arterial roads and then out onto Grovefield Way/Hatherley Lane will lock up almost instantaneously, and the 97/98 bus route and Park and Ride bus will be gridlocked also.
5. In the light of the foregoing, we have been examining the JCS transport evidence. Whilst there is much that we could and would like to comment upon within the overall strategy, we confine our comments to The Reddings and surrounding area.
6. The Reddings would be described in the JCS as South West Cheltenham. As such, traffic flows onto and off the ACR, future development implications for The Reddings, traffic calming, modal shift proposals, access onto and off Junction 11 of the M5 and the West Cheltenham development and the implications of the foregoing for The Reddings have been the primary focus of these comments.
7. It is noted that over the course of the consultation, the JCS sites have varied significantly. In response, the Transport Evidence Working Group and their consultants have run a number of scenarios, numbered 1 to 7, with a number of variants upon each scenario. Each scenario has included a “do nothing” scenario (which assumes that none of the JCS sites will be constructed, and that growth will be essentially “organic”, without any highways work to alleviate or improve the situation). TRRA take this scenario as the “base line”. The “do minimum” scenario assumes that the JCS proposals will be constructed, but the highway network is not improved, other than for local connections to the new sites. The final “do something” scenario uses traffic modelling from data generated in 2013, and projects traffic flows through to 2031 in order to identify areas of the network that require attention. It then uses the model to make adjustment to those areas and to review its effect upon the road network in general. TRRA take no issue with this approach or the programme used. It is assumed that the traffic evidence conclusion is that the JCS should adopt “do something 7 (DS7)”, on the basis that the previous scenarios DS1-DS6 have become superseded (as sites have been introduced and dropped) or, in the case of DS4, 5 and 6 have been found to make traffic problems materially worse than a “do nothing” scenario. In contrast, with the exception of a few areas of the network that remain strained, DS7 appears to provide a solution, albeit that it is a strategic solution only, and the authors of the report say as much.

**The following comments are based upon TRRA’s understanding of the Evidence reports, as set out above:**

8. The data collection for the local area which has been used for the modelling does require update, because since data was collated in 2013, the B class permission for site E3 of the JCS has been varied to include the BMW dealership, Pure Offices, Pets at Home and a Home Bargains store have been constructed, 270 houses at Symphony Road have been constructed, a 110 bedroom care home has been granted permission, and the permissioned B1 offices adjacent to Asda has now been varied to 27 dwellings. Other local infill schemes have also been permissioned. The local data is therefore out-of-date and certainly the residents and TRRA have been requesting up-to-date traffic surveys of the area for a considerable period as an increasing number of piecemeal planning permissions have been granted, whilst “rat run” traffic from outside the area associated with other new developments, and congestion avoidance has grown at a significant rate.
9. Although applications are not the concern of the JCS inspector, there is a significant interaction between traffic in the area, the Green Belt status (PMMO54) of the JCS ref E3 Grovesfield site and the developer’s current proposal to vary the permissioned B class employment (including an Aldi supermarket, Costa drive-through and a day care nursery) because loss of green belt status will significantly lessen the planning controls on the site (as there will then be no presumption against retail development in the Green Belt once the status has been removed). There is real concern that the developer will then only build the retail elements, together with perhaps one token small B1 unit, fail to attract occupants and use the NPPF and the Planning Inspector’s precedent decision to vary B1 to housing less than 0.5km away from this site (see item 1 of this report) and gain permission to construct a retail park. The developer consultant that proposed that site E3 be removed from the Green Belt has significant pecuniary interests in the site and will gain much advantage if the request is incorporated into the JCS and Cheltenham Local Plan as drafted at PMM054. Again, the Cheltenham Local Plan causes concern inasmuch as many adjoining Green Belt sites are included as potential housing/employment sites, albeit that SALA presently considers them undeliverable. However, the proposed alterations to the urban areas will introduce more development into the Green Belt and will significantly increase the pressure on the planning authority to release other “undeliverable” areas of the Green Belt will be released for development, largely driven by the NPPF obligations on the council to maintain a deliverable stream of houses. Again, although this is not directly connected to the traffic evidence, there have been over 300 objections raised to the proposed retail element on site E3. The piecemeal approach of Cheltenham Borough Council in their consultations on the Local Plan raises further concern, because the retail policy for the area cannot be determined by us. The interconnection between the developments that have already been built, the developments that have already been granted permission and the proposed hybrid application for site E3 are set out in greater detail in the document that can be downloaded from the following links:

<https://www.dropbox.com/s/y5ks45s0f5f0lia/Grovesfield%20Way%20Application%2C%20Transport%2C%20The%20Reddings%20-%20JCS%20and%20District%20Plan%20June%202017.pdf?dl=0>

[https://www.dropbox.com/sh/tt9ljigon5ldbw0/AAC3J8DK94VJRTZJAbaf\\_BUoa?dl=0](https://www.dropbox.com/sh/tt9ljigon5ldbw0/AAC3J8DK94VJRTZJAbaf_BUoa?dl=0)

10. The Highways England and Gloucestershire County Council's further position statement in respect of the Inspector's interim report (exam 232) dated 15 July 2016 concern the Fiddington site and a proposed change from employment allocation (SA9) to a retail outlet and garden centre. The developers submitted a trip generator assessment (exam 245). The Highways Authority commented on the document and accepted the change from allocated employment use to retail would result in changes to the traffic movements underlying the transport strategy. However, the Highways Authority considered that the developer's proposal was simplistic and non-robust inasmuch as there was only consideration of the net impact of the proposed changes in terms of two-way movements, rather than a consideration of the separate inbound and outbound movements. The hybrid application for site E3 adopts a similar simplistic position in their analysis. The Highways Authority states (in their Fiddington comments) that employment sites generate inbound A.M. trips and outbound P.M. trips whereas retail development generates more balanced movements, albeit with the P.M. peak being significantly busier than the A.M. peak. All of the analyses for the ACR show that it is operating at between 102.2% ranging to 184.7% of capacity, based upon the permissions granted up to 2013 which, we assume, would include the peak flows into the permitted B1 development of site E3 but not for BMW or the 270 new homes, care home and other offices and retail offerings that have already been built. As such, 184.7% may be an underestimate. In the absence of CBC's local plan for retail, TRRA strongly wish to see the Green Belt status site E3 maintained in order to prevent inappropriate retail development on site E3 as further uncalculated traffic issues will arise.
11. Corridor 9 – A46 – Bath Road includes a proposal for a signalised junction on the A46/Badgeworth Lane junction to provide improved access to and from Badgeworth (scheme ref 44). Notwithstanding the impact that this will have upon Shurdington Infants School and associated safety and congestion issues, traffic on the A46 destined for South West, or West Cheltenham, or Churchdown, will most likely choose Badgeworth Lane, then Badgeworth Road for access to the new West Cheltenham site, or Park and Ride, or BMW/existing retail stores and offices, or to the M5/A40 corridor, or to North Cheltenham and Bishops Cleeve. The 97/98 bus route which is proposed for "upgrading" (scheme ref 55) to increase its frequency, travels along The Reddings, then turns left onto Badgeworth Road. The buses also have to turn right from Badgeworth Road onto The Reddings on the return journey. The junction has poor visibility and traffic regularly builds at the junction; it is certainly a "pinch point". It is assumed that people living within the new developments in Churchdown will similarly use Badgeworth Lane/Badgeworth Road (or the bus 97/98) for access to Cheltenham either via The Reddings and Grovefield Way, possibly to use the Park and Ride, or the existing supermarket/commercial offerings, including BMW, or to access the ACR and town centre via the A40 or M5 Junction 11 via the A40. The route through The Reddings to Hatherley Lane and Hatherley Road is a popular rat run for commuters who follow the route of the 97/98. The traffic evidence proposals will impact and increase local traffic, so no effective local modal shift effect will occur. Much of the traffic will also arrive at The Reddings and Reddings Road roundabouts where, at times, we are already only a few vehicles away from gridlock. Principally, the corridor through Badgeworth Road/Badgeworth Lane and The Reddings will coincide with the more frequent 97/98 bus service and additional road junction improvement, signalling and the like will be required if this strategy is to be effective. The junction of The Reddings/Badgeworth Road, which will need to be improved for the 97/98 service to remove a "pinch point", is also close to a proposed urban area extension around The Hayloft and attached Green Belt sites that have been put forward for development, but SALA presently considers it undeliverable.

12. With the increased traffic flows predicated above by growth in commuter/rat run and bus journeys, traffic controls on SCOOT or MOVA systems may well be required in additional locations around The Reddings, in order for the proposed schemes to be successful. In particular, traffic signalled controls onto the ACR at the Hatherley Lane junction will be required, particularly in the light of the proposals for the Park and Ride which is adjacent to site E3 and the various supermarkets, BMW, retail offerings and the hospital.
13. Park and Ride – one of the exceptional circumstances that led to permission being granted for B1 development on site E3 following the Inspector’s enquiry in 2007 was to make land available for the Park and Ride extension. GCC did not take up the offer to acquire the land for the extension. In 2011 when the Park and Ride extension was removed from the developer’s scheme, the B1 office buildings were rearranged over the Park and Ride extension area to increase the employment on the site from 1100 to 1200 jobs. With the subsequent 2013 application to construct the BMW showroom, GCC Highways argued with the developer that contrary to their submission, a 1000 space Park and Ride was essential so that it could operate without public subsidy (that costed at around £70,000 per annum). This long term aim is incorporated into the overall transport strategy for Cheltenham, and is reflected in the Gloucestershire LTP 2006-2011. However, no policy or provision was made in the Gloucester Structure Plan, second review, or the Cheltenham Local Plan, that refers to, or allocates, additional land at ACR for an extension to the Park and Ride site, nor is there any detailed business plan relating to further expansion. When the BMW permission was finalised in 2014, the BMW building was located over the only land where an extension to the Park and Ride could have been made onto site E3. The location and scale of the BMW building now prevents any linked Park and Ride expansion onto site E3. A section 106 contribution of £510,000 was obtained for the “South West Cheltenham Corridor transport strategy” and future extension of the Park and Ride. Presently, the Park and Ride remains at 534 spaces, is still running at a loss and we presume it still requires subsidy from GCC.
14. With the opening of the BMW dealership in May 2017, significant local difficulties are being encountered with employees parking on the road, contrary to BMW’s travel plan. The police have already intervened and issued parking tickets for inappropriate parking. BMW have now made an agreement with the operators of the Park and Ride for staff parking on their site and, combined with the use of the Park and Ride by nearby GCHQ employees and others for overflow parking, there are now very few spaces available for parking for bus users. Locally, it has become known as the “Park and Walk”. There is a steady stream of people walking out of the Park and Ride onto the Hatherley Lane roundabout each morning. Some have either bought a bus ticket and then left the bus; others have simply parked for free by licenced agreement with the operators. However, buses rarely carry more than a few people. As such, the “Park and Walk” facility is now preventing the “Park and Ride” facility from operating correctly and this needs to be understood within the traffic model.
15. Scheme ref 40 provides for a vertical two storey extension to the Park and Ride to increase capacity for a 534 to 1000 places is proposed in the evidence. The random orientation of the site will not easily lend itself to a vertical two storey extension. Any such car park would have questionable aesthetics at the gateway entrance to Cheltenham regency town. TRRA believe that the practicalities of the site and construction will mean that a three storey or more extension is likely to be required, based on the logic within the evidence. There are no details of how the car park will be extended and still operate. Construction will almost certainly require the partial closure of at least 50%, or most likely, complete closure of the current Park and Ride and the loss of 534 local parking spaces whilst it is constructed. Loss of the Park and Walk will have profound implications locally. Details and modelling are required as a part of the evidence.

16. Scheme reference 41 proposes a new signalised junction on the A40 (presumed to be positioned at the current “bus entrance” to the rear of the Park and Ride), to enable Cheltenham-bound traffic to turn right into the Park and Ride and to enable those leaving the Park and Ride to turn left only. Unless full signal controls to all arms of the ACR are included within this proposal, traffic on ACR will become stationary and those on the non-signal arms (such as Hatherley Lane) will not be able to enter the roundabout. The movement in the road network around The Reddings, Badgeworth Lane, Badgeworth Road, bus service 97/98 and the wider area will be compromised. It is assumed that the left turn out of the Park and Ride would be for Gloucester-bound or M5-bound traffic only, to avoid circulation around the ACR. It must therefore be the case that the existing entrance off the Hatherley Lane/B&Q/Park and Ride roundabout would remain open and that those wishing to use the Park and Ride would also access it via the local road network, principally, Grovefield Way and Hatherley Lane as set out in the foregoing items. If this is not the case, then the A40 in both directions between M5 junction 11 and the ACR would effectively become a gyratory system to change direction and access other parts of the network.
17. TRRA are not clear on how background traffic growth is dealt with within the Transport Strategy evidence base. It seems to have been excluded. It is noted that an overall modal shift of 10% has been applied to the traffic figures in DS7. Will background growth cancel out modal shift? How is this modelled? The evidence base acknowledges that there is already around a 7% modal shift within the local area. TRRA cannot readily identify any proposals within the evidence that would generate such a significant additional modal shift, particularly when it seems that much of the traffic in the area is not local and is being generated by commuter traffic to existing facilities and places of employment or, to bypass (“rat run”) other areas of the network that are already operating at over-capacity. Further, much of the traffic is from outside the area where travel to supermarkets, hospitals and the like are unlikely to shift significantly away from cars. The proposal to add a drive-through Costa coffee shop, a further supermarket and childcare facility operating between the hours of 05:00 to 23:00 hours, 365 days of the year seems entirely contrary to the idea of a 10% modal shift, will significantly cause very localised congestion on the B&Q Park and Ride roundabout and most significantly on the ACR.
18. Currently, the traffic signals positioned on the ACR to allow traffic leaving Cheltenham to enter the roundabout, and provides refuge for approximately 6-10 vehicles before the entrance to the A40 Cheltenham-bound is compromised. The two additional un-signalised legs of the roundabout also create dangerous traffic manoeuvres on entering the roundabout and crossing the traffic trying to enter the A40 and into the refuge for traffic waiting to enter Hatherley Lane. With increased traffic flows highlighted above, the potential to gridlock ACR becomes increasingly significant unless all arms of the roundabout and the adjoining road merges, such as Grovefield Way and Hatherley Lane roundabout are also signal-controlled, particularly if the new scheme reference 41 proposals for traffic lights on the A40 are provided.
19. The West of Cheltenham development must also utilise junction 11 of the M5 and the ACR to gain access to the site unless and until scheme reference 3 to upgrade junction 10 of the M5, together with the other associated improvements along corridor 6 are constructed before the “West Cheltenham” site. This introduces practical detail inasmuch as the government grant for the establishment of a cyber innovation centre (ref NCSS 2016-2021) expires in year 2021. As it stands, the chosen site also has the complication of a sewerage works and there is currently indecision regarding it being moved. . Much of the JCS Cheltenham B1 employment land and housing allocation is located on the West Cheltenham site. In order to attract developer funding for a cyber park, junction 10 and corridor 6 as well as the corridor 8 improvement and those to corridor 1 must all happen simultaneously. Other improvements to other corridors would also be required.

## 19 Continued

It is thought unlikely that this could happen, in the short/medium term, particularly as the appendix M “Scheme cost assumptions” do not identify available funding, variously referring to “developer contributions”, local growth fund, ad hoc funding or Highways England funding. The evidence also identifies that the JCS schemes themselves are not sufficiently developed for the transport evidence to be accurately costed, and that the estimate of £361.5m is an approximate mid-point of costs estimated for all of the schemes. Thus, the range could vary between £181m to £723m.

20. The authors of the JCS Transport Strategy Evidence Base make it very clear that the document is strategic only, and that all JCS developments and the associated improvements to the transport network have been assumed to have been completed by year 2031 in the model. Importantly, no account of phasing is taken. TRRA are extremely concerned that funding matters will drive the West Cheltenham development ahead of the transport strategic improvements, due to inadequate funding. This would then force all traffic to use junction 11 and the ACR as set out in the “do minimum” scenario of DS7 where during the A.M. peak, the roundabout would be at 184.7% ratio of flow to capacity and 111% during the P.M. peak. Note, this is before adding in the additional local permissioned developments for the care home, 270 dwellings, etc, that have been granted and mostly built between 2013 and the current date. Further, in the open minutes of the 21 October 2016 meeting of the Cheltenham Development Task Force, Simon Excell, GCC’s lead commissioner for strategic infrastructure is minuted as follows:

*“A key issue to understanding was the financial liability of having a new bypass for West Cheltenham or a four way junction at junction 10 as Bloor and Persimmon Homes were not prepared to help fund as part of the NW Cheltenham.”*

TRRA would like to make the point that presently, there is 16,600m<sup>2</sup> of permissioned B1 class employment land available on site E3, where the developer has currently now made application for hybrid retail development following the PMM054 removal of the site from Green Belt in the draft JCS. The E3 site appears absolutely critical to act as a developable B1 employment land provision at this key gateway site to Cheltenham, whilst the provision of infrastructure for the West Cheltenham site can be arranged. Whilst improvements to the local traffic network in The Reddings are necessary and are overdue, the B class provision on site E3 will have been incorporated into the transport evidence and TRRA believe it is absolutely essential that the site E3 remains within the Green Belt in order to prevent developers being able to use the site for completely inappropriate development, such as retail within the Green Belt, and to skew the traffic evidence still further. The site E3 is presently deliverable and, if suitable, could form a part of the cyber park offering to maintain grant funding.

21. Although not directly connected with the traffic evidence, TRRA are seeking assurances from CBC in respect of the Local Plan in the event that failure to deliver West Cheltenham, and the ability for developments of up to 450 houses to be considered as an exceptional reason to develop in the Green Belt. If this were the case, then the boundary land between North Road West, the Hatherley railway line, Grovefield Way and Badgeworth Road would become the subject of developer attention and appeals, predicated upon the NPPF requirement for CBC to maintain a flow of housing. The traffic evidence in the JCS would then be completely invalid.

## Exam 202 – Appendix A

### 22. Critical infrastructure – Inspector’s request for additional information 17 March 2016:

1. By our reading, request 1 in respect of where funding might come from is not dealt with. The JCS needs to incorporate scenarios for the phasing of the various developments; the interrelated phasing of the transport strategy is clearly essential. Presently, these matters do not seem to have been dealt with at all and funding is not properly identified.
2. Request 2 regarding the phasing for infrastructure and deliverability does not seem to have been dealt with.
3. Request 3 for identification of critical JCS infrastructure has identified the key corridor routes but, certainly in The Reddings area, some developments are not included and hybrid applications to vary some of the employment land permissions to retail, as well as the potential for permissions to be granted for further housing within the Green Belt areas identified in the local plan but considered to be undeliverable at present require further consideration in relation to critical infrastructure.
4. Request 4 funding for local transport schemes – we are unable to identify evidence of available funding for any of the schemes critical to the JCS on the evidence presented.
5. Request 5 – the 2013 Saturn based model misses some of the permissioned development that has already occurred in The Reddings area between 2013 and the current date. The further proposed hybrid changes to those permissions and additional “off plan” permissions that may be granted will apply pressure for further Green Belt development in The Reddings, especially in the case where other strategic sites cannot be delivered quickly enough that could be critical to the base model, and this requires attention. Local corridor routes and interactions with critical bus routes are not identified and also require modelling.  
The models are also set to year 2031 and take no account of phasing, either for the delivery of the JCS employment and housing projects or for acquisition of funds, land, tendering, lead-in and construction of the transport network.
6. Request 6 – as far as we can see, cumulative impact on minor roads, does not appear to have been modelled, certainly not for The Reddings area.
7. Request 7 – to be considered by the Inspector.
8. Request 8 – we can find no evidence within Transport Strategy DS 7 as to whether the relevant junctions are likely to operate below capacity over the next 5 years of the plan period as only year 2031 appears to have been modelled.

We thank you for your attention to this matter and would be pleased to discuss any of the foregoing further at the relevant modification hearing sessions to be held between 11 July and 21 July 2017, should you wish us to do so.

Signed

The image shows a stylized, cursive signature of the letters 'TRRA' in a large, decorative font.

The Reddings Residents' Association

## EXAM 202 Critical Infrastructure – Inspector’s Request for Additional Information

1. The JCS does not adequately identify and address critical infrastructure requirements in accordance with PPG 12-018-20140306. The Infrastructure Delivery Plan (IDP) of August 2014 (SUB109) on page 16 identifies a funding gap of nearly £750,000,000 for the total identified infrastructure (regionally critical, critical, essential & desirable). Policy INF7 (Infrastructure Delivery) only deals with obtaining funding from developer contributions. Whilst the IDP makes suggestions as to where other funding might come from, this is not reflected in the Plan.

2. Whilst I note the JCS Councils’ responses to my previous infrastructure questions, further specific information is required. Modifications to the JCS are also needed. For transport and other critical infrastructure, the JCS team should propose main modifications to include the following PPG requirements, and should address the additional questions set out below:

- The key infrastructure requirements on which delivery of the plan depends should be contained within the JCS itself.
- The JCS should make clear for at least the first five years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development.
- Where the deliverability of critical infrastructure is uncertain then the JCS should address the consequences of this, including possible contingency arrangements and alternative strategies.

3. Identify any critical JCS infrastructure that is within the emerging Local Transport Plan (LTP) due to be adopted in June 2016.

4. As funding for local transport schemes is no longer allocated via the LTP, leaving the County Council to seek funds to deliver schemes, what certainty is there that schemes critical to the JCS will be funded ?

5. The transport modelling is based on the Central Severn Vale (CSV) SATURN strategic highways 2008 base year model. There are issues with this model, but I understand that it is the best available at present. Set out below are comments from Highways England and Gloucestershire County Council:

- Highways England, in their Matter 11 Statement say: “We are unable to accept that the model accurately reflects the pattern of traffic movement throughout the modelled area and, therefore, the scale of improvement at each location cannot be established to a satisfactory degree. Further refinement of the transport scheme is 2 therefore necessary and this is likely to result in less provision at some locations and more in others.”
- Gloucestershire County Council say in their Matter 11 Statement that the transport evidence is incomplete but that the new modelling work using the 2013 SATURN base model will not commence until June 2016 and is scheduled to be completed by the end of October 2016. In the meantime transport consultants have been tasked to consider the impact of each strategic allocation on an individual basis to establish each site’s area of influence. This will inform the quality of the existing transport network adjacent to each site. Further work is required to develop an appropriate package of measures to mitigate those impacts.
- Gloucestershire County Council also say that further attention will need to be given to some junctions that are “shown to continue to operate towards the limit of their capacity in 2031....refinements should be tested using the new CSV SATURN 2013 base model.”

6. I understand that work on the strategic sites’ areas of influence and mitigation measures is due to be completed by the end of March 2016. Will this work address development impact (including cumulative impact) on minor roads as well as major thoroughfares?

7. This new transport work will be submitted too late to properly discuss it at the transport infrastructure session. How do the JCS team propose I should deal with this new evidence in terms of consultation and hearings?

8. I understand that this work will not deal with junction capacity, which will require testing through the 2013 base model. Can the JCS team confirm whether the relevant junctions are likely to operate below capacity over the next five years of the Plan period and whether there is sufficient evidence in support?

9. If these junctions are likely to operate below capacity over the next five years, would it be appropriate to leave such junction capacity issues to be dealt with at the Plan review? Please explain your answer to this.

Elizabeth C Ord

Inspector

17 March 2016