

# **SWINDON PARISH COUNCIL**

## **Swindon Parish Council Response to the JCS Saturn Traffic Modelling Submitted 7<sup>th</sup> July 2017**

1. Saturn modelling does not reflect the traffic peak for transport movements for the North-West and West of Cheltenham or the traffic movements in to Cheltenham from Bishops Cleeve and Evesham.

Heavy traffic movements in these areas start at 7.30am in the morning and start at 16.30pm in the evenings and not 8.00am and 17.00pm which the model includes.

This may also be true of other areas of Cheltenham such as the traffic movements around the Golden Valley by-pass.

There are a number of reasons for this such as:

- the number of people driving to GEC on the corner of Evesham Road and Hayden Lane,
- Other employees throughout the area that start work at 8.00am
- People keen to be able to park in the centre and therefore wish to arrive early.
- People driving further afield

Getting the model right is important and therefore extending the survey to include the additional half-hour may have an impact on the proposals.

It is not just the transport figures that will be affected but also the environmental impact of the density and the nature of the traffic on each route.

2. The Saturn modelling is based on figures from 2013 and are therefore inaccurate.

We accept that any modelling will always be based on historic data since there will always be developments that take place after the data was collected. However, since 2013 Bishops Cleeve has continued to expand with a corresponding increase in the traffic numbers.

3. Do Nothing / Do Something Amey modelling outputs ignores the cumulative impact of traffic from the proposed North West of Cheltenham, Bishops Cleeve and the West of Cheltenham.

The comments relating to M5 Junction 10 contained in the Amey Technical Notes 'Do Something 6' and 'Do Something 7' only take into account the traffic generated from the proposed development at the West of Cheltenham but do not take into account the cumulative effect of the traffic from the proposed residential, commercial and employment

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developments at Elms Park. Therefore the preferred solutions promoted by Amey in their report favours alterations to M5 jct 10 but in such a way that it would only benefit the proposed development to the West of Cheltenham.

To favour the proposed development at the West of Cheltenham is an unacceptable short term solution that would benefit one site but would be to the detriment of other users of Junction 10.

The traffic from the new and ongoing developments in Bishops Cleeve are also ignored although the North West Cheltenham baseline transport summary mentions that local connectivity between Bishops Cleeve, North West and West Cheltenham will require extra mitigation.

In order for the proposals from Amey to be considered they need to be able to show the cumulative impact of traffic from all current and future developments and not provide a solution to benefit one site.

The impact on the North West of Cheltenham by limiting improvements to M5jct10 to benefit one site is not explored in any detail. There are no figures or modelling for the trade park and employment land proposed along the Tewkesbury Road and it is not clear if or how the traffic from the proposed Elms Park residential development are included in the M5 jct 10 modelling

4. We do not believe that this JCS plan is viable without M5 junction 10 being made an all ways junction.

The proposals may provide a short term solution for the West of Cheltenham site but could be detrimental to any future arguments to finance making the junction all ways to benefit all traffic.

5. Heavy Goods and Commercial Traffic to the North West of Cheltenham.

The proposals do not appear to analyse in any great detail the benefits of making M5 jct 10 all ways to encourage its use by commercial and heavy goods vehicles wishing to service the Commercial and Trade parks, both existing and proposed, in the North West of Cheltenham.

The impact is not only on the density of traffic generally and specifically the traffic movements through Princess Elizabeth Way but also the impact on air quality along the Princess Elizabeth Way corridor.

6. The transport plan still has incomplete evidence base:

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- a. With ref to NPPF para 182 - this plan does not provide sufficient details as to infrastructure requirements in order to make it sound
  - b. For example glaring gaps in the road provisions for smaller routes outside strategic routes - no specific mitigation strategies to alleviate congestion on PE way as a result of the increased traffic from NW and W Cheltenham
7. There is no specific plan to integrate the Railway Station by improving connectivity and making it a functioning and accessible part of a future sustainable transport plan.
  8. There are no acceptable plans to provide sustainable transport outside the strategic site allocations.
  9. There is no evidence to alleviate the already highlighted significant air quality issue (as raised in 3.5.13 on page 40 of transport evidence base ) and noise pollution
  10. Need evidence that the infrastructure including sewage will cope with the increased demand specifically if Hayden plant closes due to the proposed West Cheltenham development .
  11. Sustainability appraisal - the housing white paper has stated that authorities should only amend green belt only when it *“demonstrate It examined fully other reasonable options - non green belt sites have already been identified that should all be developed before greenbelt.”*
  12. Odour assessments need to be applied to all sites.