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6 December 2016

Dear Jamie,

Eco Park, Eastington.

Further to the recent meeting, thank you again for taking the time to set out GCC’s position on the above application, as it currently stands. Having been told by the applicant that GCC are happy, it came as some relief to learn that this is not the case.

I am writing to provide the details of West of Stonehouse (WoS) / existing Stonehouse ‘internalisation,’ as discussed, and will also take this opportunity to restate the other areas of concern.

West of Stonehouse / Stonehouse Internalisation

The following table sets out the number of vehicle trips assumed to be both completely contained in WoS and those contained in existing Stonehouse.

The 3hr totals are taken from Appendix U of the WoS Transport Assessment (TA). I have calculated the 1hr peak using the trip rates and methodology prescribed in the WoS TA.

| Purpose | AM Peak | | | | | | PM Peak | | | | | |
|-------------------------------|------------|-----|------------|------------|-----|------------|------------|-----|------------|------------|-----|------------|
| | WoS | | | Stonehouse | | | WoS | | | Stonehouse | | |
| | 3Hr | % | 1 Hr | 3Hr | % | 1Hr | 3Hr | % | 1 Hr | 3Hr | % | 1 Hr |
| Residential Generation | 169 | 15% | 75 | 281 | 24% | 125 | 43 | 5% | 15 | 301 | 34% | 106 |
| Residential Attraction | 91 | 18% | 35 | 97 | 19% | 37 | 83 | 6% | 33 | 405 | 32% | 163 |
| Employment Generation | 21 | 10% | 8 | 44 | 21% | 16 | 30 | 10% | 12 | 33 | 11% | 13 |
| Employment Attraction | 37 | 10% | 15 | 45 | 12% | 18 | 16 | 10% | 4 | 27 | 17% | 7 |
| P School Generation | 70 | 50% | 61 | 35 | 25% | 30 | 53 | 67% | 30 | 9 | 11% | 5 |
| P School Attraction | 132 | 75% | 107 | 22 | 13% | 18 | 27 | 51% | 7 | 13 | 25% | 4 |
| Total | 520 | | 300 | 524 | | 244 | 252 | | 102 | 788 | | 298 |

According to the above the combined WoS and existing Stonehouse conurbation are assessed to completely absorbed 45% AM and 40% PM of all vehicle trips generated by WoS.

The above assumptions are very high. This is in part due to no bias being placed on travel choices. In practice walk and cycle travel modes occur over short distances while those using a car are more likely to travel further. Because the adopted methodology doesn't perceive this, the underlying assumptions are that people are no less likely to walk long distances (to Bristol or Gloucester for instance) as they are to walk to the local shops. I believe this is an error in the methodology, and that a lot more of the car borne trips should be assigned to the main road network, away from Stonehouse.

Another area of concern is the way in which car trips are assigned within existing Stonehouse. Based on the diagrams contained with Appendix Y of the WoS TA, vehicles appear to be assigned to minor roads without thought to purpose. The National Travel Survey shows that between 08:00-09:00, 25% of trips are work related 50% education related, 4% shopping and 21% other purposes. Between 17:00 – 18:00 the proportions are 38%, 5%, 12% and 45% respectively. It is unrealistic for the WoS paramics model to have no zone for the Stonehouse Car Park or the Co-op car park, and have very few cars near Park School or Maidenhill School.

I hope the above will be addressed in any future modelling.

Trip Generation:

I remain concerned that the vehicle trip generation underestimates the likely number of vehicle movements. My previous analysis identifies very low average employee densities within the 'comparable' TRICS sites used.

It is curious that there are two different B1 trip generation rates used in the Eco Park TA. The socio-economic evidence assumes 1 employee per 12sqm for the Business Park which is appropriate for Office development B1(a). The TA, however, is using a trip rate more akin to B1(c).

I have carried out a comparison with the Eco Park and nearby major (Bathurst Ltd) development in Cam. The approved vehicle trip generation rates used in Cam are around 2 times higher for B2 use and 3 times higher for B8 use. Compared to Cam, Eco Park has better road links and worse public transport links. Also, Eco Park is in a much more sparsely populated area. Given this, I would expect Eco Park to be at least as bias towards vehicles, if not more so.

If the B1(a) office trip rates used for Ecotricity's proposed office, were applied to the GTH, along with the B2 and B8 trip rates approved for Cam, the total trip generation would be 219 and 292 higher in the AM and PM Peak hour respectively.

Traffic Modelling

At a recent public consultation, the EcoPark's transport expert conceded the expectation that WoS would saturate the A419; and that peak spreading and congestion were commonplace elsewhere, and the price to pay for development.

We are in agreement, that the only practical way to assess the impact of the development on the A419 to the east of Chipman's Platt is to extend the paramics model.

I note from HE's letter from January 2016:

Given the close proximity of junctions positioned along the A419 corridor between the A38 and Stonehouse it was requested that the interaction of traffic and queuing along the entire corridor be modelled in s-paramics.

I am curious to understand how HE were persuaded to change their mind from the above to, as we understand it, being ready to accept a small 3-junction model. It seems inevitable that the sheer volume of traffic will create slow moving queues along the A419, which will impact the operation of Chipman's Platt.

In any event, as you point out, HE's brief is much narrower than GCC's. It is worth pointing out that the WoS traffic demands on the A419 between Chipman's Platt and Horsetrough, which gave rise to the requirement for a simulation model for WoS, are virtually identical to Eco Park's traffic demands along the same stretch of road.

I have noticed anomalies with the stand-alone junction modelling but, as we are agreed that these are not fit for purpose, I won't elaborate on these in this letter.

Study Area

It is understood that GCC have specified a 5% threshold, above which the applicant must look at junction impacts. The study area should, therefore, include the A419 / Selsley Hill (Sainsbury's) Roundabout and, most likely, the A419 / Dudbridge Rd Roundabout.

The Sainsbury's Roundabout is identified, by the evidence base for the local plan, as requiring improvement. The problems with this junction are self-evident, with queues sometimes extending as far back as the Ryeford Estate signals in the morning peak.

It seems to me that the applicant and / or the LEP should focus some attention on this issue as it is already set to compromise the adopted local plan.

The effect of a saturated main road link is, inevitably, diversions onto minor roads.

It is noted that GCC have asked the applicant to explain the extent to which traffic is assumed to travel via the new WoS link over the Oldend's Lane level crossing. I do not consider it appropriate to assume / encourage the use of Oldend's Lane (over the level crossing). This link is a critical sustainable transport link between WoS and existing Stonehouse (local plan strategy) and any significant increase in traffic would undoubtedly discourage walking and cycling trips. It concerns me greatly that the paramics model developed for WoS did not appear to include a drive time validation of this route. I note your comment that paramics modelling to date has been too focused on the main road. Hopefully this can be addressed when paramics is used to assess these roads for Eco Park.

There are a number of alternative routes between Stroud and the west. Eastington – Frocester – Stanleys is one; as is Standish – Randwick. The prospect of traffic diverting away from a saturated A419 onto these routes is causing the local communities a great deal of concern. I would like to see the applicant assess the likelihood and impact of this.

As discussed, the applicant's consultant appears to have misunderstood the concerns relating to traffic rat-running through Eastington. It is not expected that vehicles will divert off the main roads between Claypits and Spring Hill, as this will only lead to/from the worst congested section of the A419, but that vehicles will divert through Eastington onto Bath Road towards Frocester.

The conclusion in the current Appendix X, that the balance of traffic movements must have either origin or destination in Eastington would only be true if there were no other roads to/from Eastington. By ignoring Bath Road, this conclusion is unsound.

Phasing

I agree with your concerns on the latest phasing strategy and the lack of interim assessment scenarios.

Sustainable Transport Issues

The improvements to sustainable transport, compared to the previous submission, are welcome. It is important to ensure that the diversions and additional demand do not impact the service levels required for WoS. It is likely that additional buses and drivers will be needed.

Buses should be provided to the site at an early stage, while travel behaviour is being established. The developer should be expected to fund this.

I feel that the Travel Plan (TP) falls short of what might be expected at this stage. The underlying premise, that travel behaviour cannot be anticipated, is obviously not what the Transport Assessment is based on. I believe it would be prudent to embed the ambitiously low vehicle use, assumed within the TA, as a benchmark within the TP.

Construction Phase Traffic Management

The local community of Eastington are very concerned that the dualling of the A419 will involve diversions along Spring Hill and Grove Lane during the construction works. As you have explained, the LEP are seeking public money to fund the development's highway impact mitigation and, because this falls outside the planning process, you are not able to impose conditions.

More recently, the applicant has advised Eastington Parish Council (EPC) that they are fully committed to fund the dualling. In any event, the local residents' concerns remain.

I hope you find the above input useful.

Yours sincerely

James Hunter

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