

## LOCAL DEVELOPMENT PLAN - INDEPENDENT EXAMINATION

### Hearing Session 17 - 23 March 2016 - Statement by Timothy Knowles (ID - 1784)

#### Transport - Agenda 5

#### **Are any alternative transport schemes necessary to ensure Plan soundness? If so, why is the submitted Plan unsound?**

Yes. Contrary to the *Highway Impact Assessment* dated September 2013 (SD 64) ("the Highway Assessment"), the A48 between Cowbridge and Culverhouse Cross ("the A48 Corridor") was already operating over capacity at peak periods in 2012. Also, the Highway Assessment omitted the Tesco / Copthorne Way junction on the A48 ("the Tesco Junction") which, along with the said over capacity of vehicles on the A48 Corridor, causes long tail backs of stationary and slow moving east bound traffic in the peak morning period, particularly from 7.30 to 8.30 am. Although paragraph 4.6 of the Highway Assessment acknowledged that the Culverhouse Cross junction (Junction 5) was already operating over capacity, the flow of A48 traffic into that junction is substantially protected (reduced) by the delay at the traffic lights at the Tesco Junction.

So far as the Highway Assessment relates to the A48 Corridor and the omission of the Tesco Junction, it is fundamentally flawed. The link capacity of the A48 Corridor has been wrongly calculated on the basis of a 60 mph speed limit at three points along the A48 Corridor without reference to the bottlenecks created by traffic lights at Sycamore Cross and St Nicholas and speed limits of 40 mph and 30 mph through Bonvilston and St Nicholas, respectively. The link capacity should have been calculated at the slowest section not in the fastest 60 mph sections. See my Representation No 3 dated 23 November 2013 - Highways (ID-1784/1) ("the Highways Representation") which described this issue in greater detail.

The response of the Council to the fundamental flaws in the Highway Assessment described in the Highways Representation was wholly inadequate (page 2778 of Appendix 12 of the Consultation Report - SD 08.4). No attempt was made to check the facts and consider the very significant implications. In essence, it simply relied on the fact that the Highway Assessment had been carried out and that, in future planning applications for Site MG 2 (43) at St Nicholas ("the Site"), a "... robust Transport Assessment that evaluates and determines mitigation measures which alleviate any detrimental future impact future (*sic*) development proposals will have on the local highway network and associated road junctions" must be provided. The Council has described the Highway Assessment as "...a very high level assessment..." (item 8 of Appendix A of the Highways Representation).

The composite response of the Council to many representations concerning the impact of additional traffic generated by proposed housing developments was set out in paragraph 3.1.1 of Appendix 11 of the Consultation Report dated May 2015 (SD 08.3) ("the Composite Response"). The Composite Response acknowledged that "...a number of junctions within the Vale are currently at or above their threshold capacities...". The only solution offered by the Council was exactly the same as that quoted above, namely for the provision of a robust Transport Assessment for each development.

Notwithstanding the fundamental flaws in the Highway Assessment and the very high level of the assessment, it "...forms the basis for the highway schemes allocated under LDP Policy MG 16 ..." (paragraph 2.2.58 of the Draft Infrastructure Plan dated September 2013 - SD 65). Policy MG 16 contains no proposal to alleviate the traffic problems along the A48 Corridor or at the Tesco Junction or the Culverhouse Cross roundabout.

The supposed requirement for a robust Transport Assessment at planning stage does not address the fundamental issues that the A48 Corridor and Junction 5 were already operating over capacity in 2012 and the effect of the omission of the Tesco Junction in the Highway Assessment.

There will be considerable growth in traffic on the A48 Corridor between 2012 and 2026 resulting from the following:

- normal projected growth in traffic;
- the LDP proposal (*Housing Status Table* dated 5 November 2015 - ED 08.2) for 951 new houses in Aberthin, Bonvilston, Colwinston, Cowbridge, St Nicholas and Ystradowen. A substantial proportion of the residents will commute daily to Cardiff;
- additional traffic movements generated by the St Athan - Cardiff Airport Enterprise Zone (Policy MG 10);
- the proposed improvements to Five Mile Lane (item 16 of Policy MG 16) which will encourage drivers to / from the Airport and the South West Vale (including the Enterprise Zone) to choose that road and the A48 Corridor from Sycamore Cross to Culverhouse Cross (identified as a Strategic Transport Corridor - Figure 2 on page 33 of the LDP);
- the reintroduction by the Welsh Government of the proposal to trunk the A48 from Culverhouse Cross to Sycamore Cross (paragraph 2.2.61 of the Draft Infrastructure Plan). No account was taken of this significant proposal in the Highway Assessment (item 8 of Appendix A of the Highways Representation); and
- the introduction of bus priority measures on the A48 Corridor (item 8 of Policy MG 16 and paragraph 6.105 of the LDP) which will inevitably slow non-priority traffic.

There will also be considerable growth in traffic at Culverhouse Cross (Junction 5) resulting from the housing developments at Wenvoe and ITV as well as Barry.

The Council's response to the defects in the LDP of a requirement for a robust Transport Assessment at planning stage is wholly inadequate and too late in the planning process. No Transport Assessment for an individual development can provide a solution to the major existing and prospective future deficiencies identified above. The Council is currently processing two full planning applications (2015/00249 by Redrow Homes (South Wales) Limited and 2015/00662 by Waterstone Homes Limited) for the two sections of the Site.

The applicants for 2015/00249 (96 houses) have submitted a revised Transport Statement dated October 2015. It provides traffic statistics and proposals for local alterations to the layout of the A48 to provide access to the Site. The applicants for 2015/00662 (21 houses) have submitted a Transport Note dated June 2015 which relies on statistics in application 2015/00249 and proposes local alterations to the layout of the A48 to provide separate access to the Site. Both planning applications estimate the additional traffic which would be created by the individual development but ignore the effect of all other proposed developments and the other deficiencies identified above. They offer no solution to those deficiencies. The increase in traffic generated by an individual development may be relatively small but, in aggregate together with the other sources of traffic growth listed above, they will have a substantial impact on the volume of traffic which is already in excess of capacity at peak periods on the A48 Corridor and at the Tesco Junction and Culverhouse Cross.

Neither of the above planning applications contains a "robust Transport Assessment" to address the identified fundamental issues. In respect of the LDP, the responses of the Council to these issues (paragraph 3.1.1 of the Composite Response and page 2778 of Appendix 12 of the Consultation Report - SD 08.4) are demonstrated to be wholly inadequate by the failure of the Council to obtain any robust Transport Assessment at planning stage. Even if 'robust Transport Assessments', which referred to the fundamental issues as described above, had been submitted (which they were not), they could not provide an adequate solution as the issues are far wider than the individual development. The Council has totally failed to address the fundamental flaws in the Highway Assessment so far as it relates to the A48 Corridor, the Tesco Junction and Culverhouse Cross (Junction 5) or to take account of the very substantial prospective growth in traffic in the period to 2026 identified above.

This growth in traffic along the A48 Corridor and at the Tesco Junction and Culverhouse Cross is unsustainable. In this respect, the Council has failed to give proper consideration to the highway infrastructure requirements and, to this extent, the LDP is unsound.

As proposed in the Highway Representation, I request the following changes to the LDP:

- The housing allocations at Bonvilston (Policy MG 2[37]) and St Nicholas (Policy MG 2[43]) should be deleted from the Deposit LDP.
- The following additional paragraph should be inserted in the narrative supporting Policy MG 16 in the Deposit LDP:

"The strategic A48 highway between Cowbridge and Culverhouse Cross is already operating at over capacity in the peak periods and delays to traffic also result from over capacity at the Tesco Junction and the Culverhouse Cross roundabout. The Council has no scheme(s) or allocated funding to alleviate these serious highway problems. Unless and until satisfactory highway improvements have been completed to alleviate substantially these problems and in accordance with paragraph 5.65, no material housing development(s) (any one scheme involving more than three houses or all schemes involving more than ten houses in aggregate) will be permitted in or near the minor rural settlements along the A48 between Cowbridge and Culverhouse Cross."