

Dear Claire

Thank you for your response. We will have to agree to disagree on most aspects and wait 5 – 10 years to determine who is right. I do want to make two final points:

1. As long as you continue to use data for current traffic volumes on Swinley drive that is so patently inaccurate, I will continue to be wholly un-convinced of the accuracy of your traffic predictions.
2. I will never agree with the MfS recommendations to put through roads through the heart of a community. The logic for it is irrational in my view (unless, of course, financial savings for the developer are considered). If the road did not go through the centre of the development, all the issues you raise about road widths, speeding vehicles, intimidation for pedestrians, cyclist etc. and the SRA views of gridlock would go away. My analogy is this: There is a need to safely get to the other side of a frozen lake. If all safety aspects of walking on ice were mitigated with the right equipment etc, you could walk across the lake. However, without the need to mitigate safety implications, you could also walk around it.

Best Regards
Kevin

From: [Claire Cornelius](#)
Sent: Wednesday, August 28, 2013 6:49 PM
To: shaw-residents@virginmedia.com
Subject: Revised response to the SRA gridlock response.

Dear Mr Fisher and Shaw Residents Association,

Thank you for your email and report entitled Ridgeway Farm – A Recipe for Gridlock of the 4th May 2013, my original response of 6th June 2013 and our subsequent meeting with Gwillam Lloyd, Head of Highways & Transport on 4th July 2013 to discuss and compare our respective views.

The meeting I felt was very useful in that it allowed some of the misunderstandings of the gridlock report that were carried though into my original response to be discussed in detail and whilst I think it would be a fair account to say that we are still not in complete agreement on all the issues there were some positives that we can take from the meeting in particular that you consider the reports future traffic flows to be comparable to those the Developer predicted.

I would like to start my response by acknowledging the amount of work that has gone into preparing the report and carrying out the associated traffic surveys both by yourself and other concerned residents.

You will be aware that Wiltshire Council is the administrative authority who considered the recent planning application for development,

As the administrative authority determining the application Wiltshire Council afforded Swindon Borough Council the opportunity to comment on the application. As a consequence Officers for both Wiltshire and Swindon reviewed the application and

commented on the impacts of this development. I personally assessed this application and raised concerns from the beginning given my knowledge of the traffic issues in West Swindon. In addition I arranged for specialist transport modellers from Halcrow Ltd to assist the Borough Council in reviewing the Transportation Assessment prepared by WSP's Mr Blacker. The modelling was undertaken in accordance with Department for Transport guidance using nationally recognised tools. The modelling used Swindon Borough Council's own SATURN model which had been updated in 2010. As a result of the work the Borough Council did the Transportation Assessment for the whole site was re-modelled.

Transport models such as the Borough Council's SATURN model are complex numerical programmes that are built up using all kinds of information such as road side surveys, census information, traffic counts for example and can predict driver behaviour. These models then use yearly growth figures provided by the Department for Transport to provide base flows and predict future year flows. SATURN models are used throughout the UK and are accepted by the Planning Inspectorate as an appropriate method of predicting the impact of a development.

The model for Ridgeway Farm showed substantial increases in traffic from the new development however the increase was spread over the network due to drivers being shown to choose roads such as Swinley Drive over Mead Way. Ultimately this increase was on roads that had spare capacity to absorb the demand. For example Swinley Drive was predicted to experience an increase of 88% southbound in the am peak equivalent to 150pcu's. However given the design of Swinley Drive it has the numerical capacity to absorb approximately 900 pcu's one way every hour using information on road capacity identified in the Department for Transport's Design Manual for Roads and Bridges. This method is used nationally and industry wide.

The modelling in the TA also showed where additional traffic was added to already congested roads such as Mead Way, it resulted in single figure percentage increases in flows as a result the impacts using accepted industry practice are only assessed to be marginally significant. The Policy which governs the assessment of planning applications is the National Planning Policy Framework and in terms of transportation they advise the following:

Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

Swindon Borough Council pursued our objection to this scheme and Wiltshire Council ultimately refused it with the highway reasons of sustainability, poor design and amenity impact on neighbouring roads forming part of the refusal.

Officers for the Borough Council prepared our evidence using all the resources available to us. In the build up to the Appeal this was presented to leading Queens Counsel who advised that our case was weak and we should withdraw. In terms of the policy against which we are judged the impacts as agreed through the modelling was not 'severe'. In addition to that the Developer had addressed our concerns around sustainability and design through re-design or empirical assessment. As such this left us no option but to withdraw the Borough Council's objection on

transport grounds and this is covered in the Statement of Common Ground prepared by WSP, Swindon Borough Council and Wiltshire Council.

The Shaw Residents Association Report at the section titled 'Background' where you refer to aspects of the design there are a number of inaccuracies I would advise you of I will discuss these subsequently however I would first like to point out that the internal design of the site is the responsibility of the Wiltshire as Local Highway Authority. The roads Swindon Borough Council is responsible for are the southern section of Purton Road (up to the centre line) and the connection to Sparcells Roundabout. I would also advise you that we have not been consulted over the recent reserved matters application or Design Code. Since the Appeal Swindon's highways team have met with the Developers and Wiltshire highways officers once to discuss detailed design. Given that Wiltshire Council is the approving authority the Developers have been dealing with Wiltshire as the responsible highway authority. Swindon Borough Council officers have been copied into the submissions and been offering comments to Wiltshire. We have at this stage no influence or authority over the detailed design as it progresses for all roads located outside of Swindon.

The documents you have reviewed and quoted in the Report to illustrate your concerns around the width of the spine road are out of date documents. The Lancashire residential road design guide is based on Design Bulletin 32 which was first published in 1977. A second document from Northampton referenced was replaced in 2008 with a document titled "Northampton Place and Movement Guide". This replacement document was based on current guidance set out in Manual for Streets (2007) and Manual for Streets 2 (2010),

Manual for Streets highlights design standards for different road users and encourages moving away from hierarchies of standard road types, developing street characters that strike the balance between place and movement on busy streets. It is no longer considered appropriate to design streets that take traffic around the edge of development. Taking traffic through the centre makes it an accessible, inclusive and active place that connects into the urban fabric. I use a diagram from Manual for Streets 2 to illustrate.

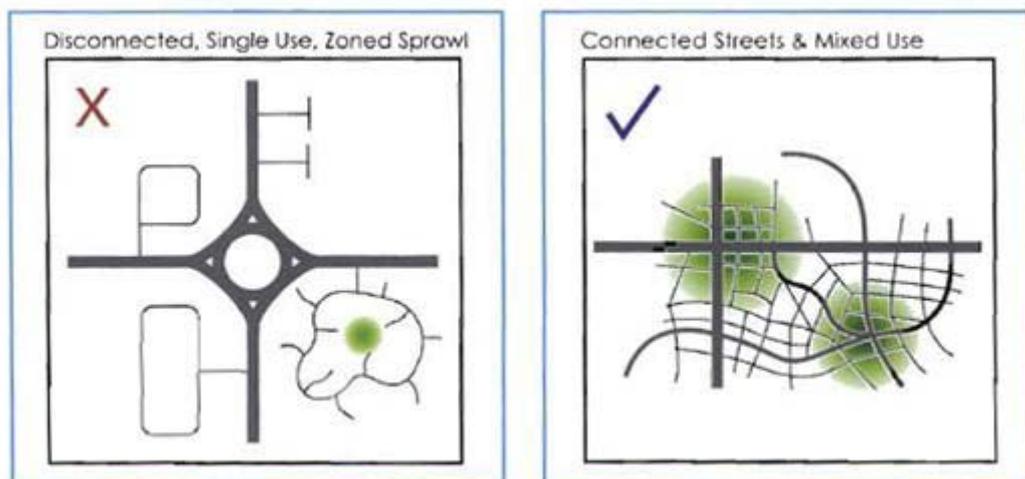


Figure 2.4 - Urban Extensions; Suburban Sprawl vs Connected Development

The Developers Engineers, highway officers from both Wiltshire and Swindon believe it entirely appropriate to provide direct frontage access onto the spine road and is common in all urban areas including in some instances where 40mph speed limits apply without evidence to suggest that this practice is unsafe.

The spine road width of 6.5m is appropriate subject to localised widening to accommodate larger vehicle swept paths. At 6.5m width you could still allow two cars to pass if a vehicle were to be parked on the spine road. An average parallel parking space is 2m wide, leaving a width of 4.5m. Two cars can pass in a straight line with a width of 4.1m. There are locations where this currently occurs however there are locations where drivers choose not to undertake this manoeuvre. I would suggest from my experience that where there are high volumes of traffic this will commonly occur as choosing to wait will result in delays however where flows are lighter a driver may choose to wait.

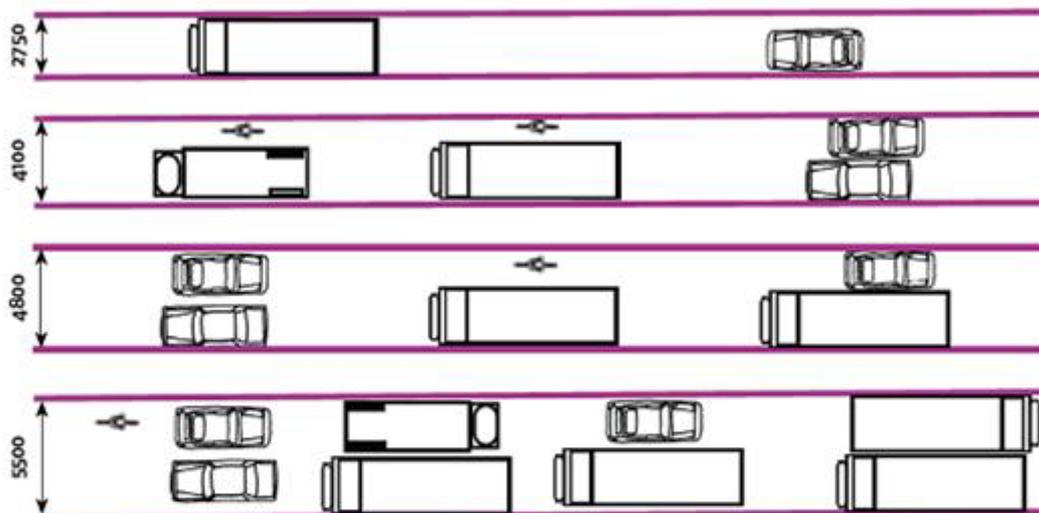


Figure 7.1 Illustrates what various carriageway widths can accommodate. They are not necessarily recommendations.

You will note from the Manual for Streets 1 diagram above that two HGV's can pass on a road width of 5.5m.

Increasing the road width beyond what has been allowed will likely have detrimental knock on impacts in terms of connectivity, speed control and safety and is ultimately not for Swindon Borough Council to approve or not.

I note concern regarding the Bus Operators view on the design of the spine road and can confirm that they were consulted as part of the application and I had a meeting with them regarding the on-going sustainability of the bus diversion and frequency at which time they did not make any representations regarding the ability to use the road.

There is a clear connection based on evidence as discussed in MfS between road width and speeding. The greater the road width and indeed the greater the prominence given to the vehicle the more difficult it is to control speed without vertical measures (speed bumps for example). To increase this spine road further would cause me concern.

As a pedestrian a 6.5m wide road could be quite intimidating hence the need for extensive pedestrian refuges at desire lines along the spine road. To increase the road width will in my view create an intimidating environment and will decrease people's propensity to walk undermining the sustainability of the site.

The current design guide for Northampton that you referred to quite succinctly covers this point by saying: Some appropriate speed control options are listed below:

Discouraging car dominated development layouts

- Frequent junction spacing on straight sections street – drivers are then aware that vehicles may be pulling out from side streets
- Reduced visibility, at junctions for example
- Narrow carriageway widths
- Shared surfaces
- Encouraging pedestrians and cyclists to use streets
- On street parking - naturally slows vehicles down.

For your further information the new Northampton design guide looks specifically at the difficult balance between vehicles, pedestrians, cyclist on routes through communities. They consider that a successful example of this is High Street, Olney (A509). A classified road which has strategic regional function as well as local. This road had (2005) an Annual Average Daily Traffic flow of 15 165 compared to the anticipated 14 667 predicted in 2016 on Purton Road. In order to prevent car domination the road width has been constrained through the use of echelon parking on either side of the road and wide pavements with an average running carriageway width of 6.5m. Admittedly I haven't visited this site however the two on the face of it appear comparable.

High Street, Olney



I understand that this approach to road design will seem unfamiliar to people especially those who live in West Swindon as the road network in this area does accord with older guidance and provides a more definitive street hierarchy and generous road width as per Design Bulletin 32. In summary I would point you to the current national guidance in MfS which has been researched and evidenced by experts from the Department for Transport, Independent Transport Consultants, Local Highway Authorities, Health & Safety Executive and Stakeholders such as Guide Dogs for the Blind Association or Cycling England for example.

As is acknowledged in the Shaw Residents Association Report the traffic counts discussed in 'Summary of Traffic Count Data' undertaken by the team of volunteers is not representative as they were not undertaken in accordance with DfT requirements however they are a snapshot in time. I do not however agree with the summary you draw from these counts for the reasons I have previously highlighted. I do not believe that 'traffic will stop flowing and back up along the length of all three approach roads', the reason I cannot accept this is that there is no evidence to the contrary. The report is expressing an opinion, I would again highlight that it has been accepted through well-established industry practice using Department for Transport's, Design Manual for Roads and Bridges (Traffic Capacity of Urban Roads TA79/99) that both Swinley Drive and Purton Road have the capacity to cope with the additional volume the development will create. This is further supported by Northampton statements on High Street, Olney. The forecast figures the Gridlock Report predicts for the traffic post development would represent one vehicle every 3.3 seconds which does not equate to the kind of delays and queuing suggested and as I have already set out does not accord with capacity assessments.

The capacity assessment takes into account frontage development, unlimited access to houses, shops and businesses and adjusts the capacity accordingly as this does affect the volume of traffic a road can carry. This has already been accounted for in the assessment.

The Shaw Residents Association report also states that an outcome of gridlock would be diverting traffic. This is already a reality on large parts of many urban road networks such as Swindon's and in fact allows more vehicles to use constrained local networks. Existing congestion results in route choice change or a change in the time people choose to make this journey. The modelling undertaken for Ridgeway Farm showed this would increase as a result of the development and carry on into the future as background growth increases. This was all set out before the Inspector in the documents submitted. The impact of this diversion was not considered to constitute the severe impact required to sustain an objection.

The report asserts that an impact of this gridlock would be that Sparcells roundabout will not be able to operate and will block traffic flow from and to Mead Way. As discussed above the capacity of the new Purton Road has not exceeded operating thresholds in DMRB and is therefore considered to operate satisfactorily and not create the gridlock suggested. As such I cannot agree that this impact would occur. There is a signalised toucan crossing (pedestrian and cyclist) envisaged to be located in the vicinity of this roundabout exact location to be agreed with Wiltshire through the detailed design process. This crossing may have some impact at peak

times. Sparcells roundabout operation was considered as part of the application and as you would expect due to the increase in traffic the 'spare' capacity of the roundabout is reduced by the development and on some arms exceeds the theoretical capacity. This impact was identified and mitigated by the S106 contribution that specifically relates to addressing congestion.

I note that the report has rejected the 0.44 trip rate used in the Transport Assessment and suggested a more appropriate figure would be 0.81, that is almost double. Whilst the report references a footnote for this figure based on a survey I was not able to find this survey and study its validity. However, I note that the trip rate used for forecasting traffic volumes was an average between the 0.44 trip rate and the reports suggested 0.81 which is 0.62. Trip rates are taken from TRICS which is a database system with over 6 600 surveys across a wide range of developments across all regions of the UK. By filtering out inappropriate locations and matching the development site as accurately as possible to surveyed sites (matching includes proximity to public transport, frequency of transport, urban/suburban location, facilities on site for employment/health/leisure etc) this allows accurate prediction of the trip rates a site would generate. Again, this is a nationally accepted and industry wide tool.

The traffic counts undertaken by Shaw Residents Association are a snapshot in time over two days. Swindon Borough Council's model is also a snapshot in time albeit more extensive and I am not surprised that the flows do not match up. The flows used in the SATURN model are extrapolated up using regional growth figures and driver behaviour is predicted using complicated algorithms for example all of which have the potential to affect accuracy. Models are however the best tool available for the job and are used nationally in predicting the impact development will have on a highway network.

Despite being unable to reach agreement on what an appropriate trip rate is, distribution of traffic, capacity of roads, capacity of junctions for example it was encouraging to note that your forecast traffic volume figures are comparable to those that the Developer predicted and Swindon/Wiltshire highway officers agreed with.

Whilst broadly in agreement with the future traffic flows the impact of these volumes is still an area of difference between us. I can understand your views and concerns however as I have set out above the standards and guidance of the transportation industry together with current Government policy does not support that view.

The assessment of the Developers Transportation Assessment was undertaken by experienced Officers at both Wiltshire and Swindon supported by Halcrow an internationally respected company. Our assessment is a professional judgement based on years of training and experience using nationally recognised documents and industry recognised practices. I am sympathetic to the concerns however I still believe that recommendations and actions were consistent with policy and standard constraints we work within together with our own professional integrity.

In conclusion I would also highlight that all of the transportation assessments, 3rd party objections and evidence was presented to the Planning Inspectorate at the Appeal. In deed you state that SRA itself produced a Proof of Evidence for the

Appeal. The Inspectorate considered all of this and having listened to all the views expressed and reviewed all the evidence concluded that;

“368.

In conclusion, whilst there would be little justification for refusal of the proposal solely on the grounds of increased traffic, common sense indicates that local residents would inevitably experience some impact from additional road noise, longer journey times and pressure on existing parking availability. These would be adverse impacts that would conflict with saved policy C3 of the NWLP and policy CP57 of the dWCS which include the aims of ensuring that the amenities of neighbouring occupants and residents are not adversely affected and therefore weigh against the proposal in the overall balancing exercise.”

The Secretary of State also concurred with the Inspector and yet it was not sufficient to justify refusing the application which goes back to the core of the matter that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. There will be impacts in terms of transportation as a result of this development, Swindon Borough Council has always been clear on this point in all our representations, the degree of the impact is not considered severe.

It is not possible to revisit this decision nor has Swindon Borough Council any ability to insist that the Developers radically change their design. It is a well established legal principle that following a successful appeal the Highway Authority has no option but to cooperate in implementing the planning permission. The Highway Authority must enter into any necessary agreements. This is based on the premise that it is not reasonable for a Highway Authority to refuse to cooperate with the developer which would effectively amount to a veto of the planning appeal process, which the courts will not allow.

Section 106 monies were secured through the planning application to mitigate the impact of the development at a total of £605, 580.00. This contribution is to address congestion on Mead Way and impact on Swinley Drive/Purton Road for example.

In addition to this Officers in Highways & Transport have recently commissioned a Feasibility Study, that will generally follow the government WebTag processes for the Thamesdown Drive to Barnfield Relief Road (formerly known as the Purton Iffley Link). This study will provide up to date costings and options putting us in the best possible position to potentially bid for central government funding. You may have noted in the Swindon Advertiser, Monday 3rd June 2013 that we were successful in securing £2.9M for further improvements on Great Western Way making a total estimated project cost of £4.7M.

I am sorry for the concern this is giving your community and that you felt the need to spend your time undertaking traffic surveys. I can only assure you that the original assessment was undertaken in a proper manner by competent Officers. The Highways & Transport Service will continue to work with the community to monitor how traffic uses the local road network and continue its approach that subject to funding being available it will programme any appropriate mitigation measures that

are deemed to be required to mitigate unforeseen consequences of this development.

I hope this email is reflective of the areas that we agreed needed change/clarification, if there is any particular area that isn't please give me a call to discuss. My thanks again for your patience for this revised response and apologies for delay.

Regards, Claire.

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Highways & Transport
Swindon Borough Council