**Response To M5 Junction 10 Consultation
by Save the Countryside**

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1. **Background**

Save the Countryside is a campaign group formed over 14 years ago, by residents from the parishes of Swindon Village, Uckington and Elmstone Hardwicke, in North West area of Cheltenham, situated both in Tewkesbury Constituency and in a Cheltenham Borough Council and Tewkesbury Borough Ward’s.

Over many years we have interacted with the consultation process for the Joint Core Strategy of Cheltenham, Tewkesbury and Gloucester and the proposed changes to the M5 Motorway at Junction 10

This has involved giving evidence both verbally and written to the JCS teams, in respect of the Strategic Allocation, known as North West Cheltenham, and subsequently to the Inspector's Inquiry

1. **Key Concerns**

Transport and congestion have been one of our key concerns already shared relating to the development of North West Cheltenham. The proposed development of Junction 10, Tewkesbury Road and West Cheltenham link road is such a significant piece of investment, the scope should include points of concern already raised as part of the Joint Core strategy.

These issues were to be addressed via the adopted JCS in relation to the policies on Health and Environmental Quality, SD14, Transport, INF1, A4 North West Cheltenham, Strategic Allocation.

From this proposal it seems that some key parts are still not yet addressed, and we ask that they are included in the forthcoming transportation plans before any large-scale development is approved in NW Cheltenham

* Western Relief Road
* Uckington Park and Ride
* A fully integrated safe Cycle and Footpath network
* Coombe Hill inclusion

Cheltenham has so many serious transport issues in its own right, which have not yet been adequately addressed. At present there is no connectivity or any ring roads to travel across Cheltenham in either a north/ south direction or in an east/west direction. This causes severe congestion, and pinch points on the Strategic Networks through the town, especially along the A4109, which results in serious noise and air pollution. This has been monitored and recorded during the JCS process.

There have already been large new developments built at Bishops Cleeve, Twigworth, Longlevens with two even bigger developments planned at North West Cheltenham, and West Cheltenham, approximately over 6000 new homes and employment and ancillary services on this side of Cheltenham, as well as new developments on the west side of Tewkesbury.

This has already resulted in ‘rat runs' along Old Gloucester Road, B4634, Withybridge Lane, Boddington Lane, Stoke Orchard Lane to Bishops Cleeve, and the A38 at Coombe Hill, Hyde Road, Kingsditch Trading Estate, and Gallager Retail and through Swindon Village itself. These are all being used as 'Relief Roads' for local residents moving from their homes to their places of work.

**JCS BACKGROUND PAPERS**

In the JCS Sustainability Appraisals, 2011 it was stated that the two developments of North West, and West Cheltenham should not be brought forward until **the Western Relief Road, linking Bishops Cleeve through to the west of Cheltenham was built**. This was accompanied by costings of the road going over the main railway line.

Similarly in 2016 the JCS Transport Strategy put before the Inspector, listed that there would be a new dual carriageway linking the A40 to the A4019, and a new link road from the A4019 to Hyde Lane, with an upgrade of the A435 Evesham Road, and the junctions on Hyde Lane

Schemes also identified to be in place are a '**NEW PARK AND RIDE SCHEME AT UCKINGTON'.**

**JCS EXAM DOC 84 10/07/15**

Atkins transport mitigation survey summary report listed a strategy to minimise the transport impacts of the Strategic Allocation NW Cheltenham Site A 5. This includes measures to restrict rat runs along the Stoke Road, minor road off A38, (Odessa Pub), Village Road, Old Gloucester Road and a 600 space Uckington P&R, access off the A4019.

1. **Specific Comments on the Consultation, M5 Junction 10, Improvement scheme
Dec 2021 -Feb 2022**

We note that the documentation is incomplete, as there is some information yet to be provided, before the process is to proceed.

Our team are in agreement with the scheme objectives as listed below, but we have the following points to make:

a. Support economic growth, and facilitate growth jobs and housing, by providing improved transport network connections in West and North West Cheltenham

This has been shown to apply to the whole of the Strategic Network of the A4019, by dualling to allow for the free flowing of local motorised traffic.

**Cycleways**: The connection to the existing cycle network is incomplete. Pedestrian and cycle ways should be in place for its entire length to Coombe Hill, not stopping at the Junction 10, but linking up with the wider cycle network.

b. Enhance the transport network, in the West and North West of Cheltenham with the resilience to meet current and future needs

The proposed Western Relief Road does not provide a full network, as it only goes from a roundabout to another roundabout. It should include the dualling of the B4634.

This road encourages traffic to go towards West Cheltenham, but does not provide any connectivity with the large North West Cheltenham Strategic Allocation, named Elms Park in the Planning application 16/02000/OUT for over 4500 homes and ancillary services, effectively a new town on the outskirts of Cheltenham

The designs for the proposed West Cheltenham, are not promoting this, as the road proposed through the site is resticted to 20mph, and is accompanied by a mobility hub, and a bus interchange.

c. Improve the connectivity between the Strategic Road Network and the transport network in West and North West Cheltenham

The scheme is missing the Park and Ride at Uckington which was part of the Joint Core Strategy and the draft Gloucestershire Local Transport Plan
This scheme only supports vehicles leaving Junction 10 to travel to the enlarged Arle Court Park and Ride via the Western Link Road, and the West Cheltenham development.

A Park and Ride at Uckington is essential to reduce that amount of traffic using the already overloaded A4019 in both directions and to reduce congestion in the surrounding roads

e. Deliver a package of measures which is in keeping with the local environment. establishes biodiversity not gain and meets climate change requirements

The local area around the exisiting junction is already prone to normal and abnormal pluvilal and fluvial flooding. The proposed Western Relief Road, and alterations to the A4019 across the flood plain will add to this potential flooding additional measures should be taken to counter this as discussed below.

The area along the A4019 from Cheltenham, has been identified as area of noise, and air pollution. Junction 10/Withybridge Gardens has been monitored for air quality by TBC Environment Department for many years, and their records are readily available.

**Mitigation measures**: We wish to comment that the widening of Tewkesbury Road, will have a detrimental effect on residents of properties and homes, adjacent, with particular importance to several listed buildings at the proposed new junction at the Moat Lane, and New Road, and especially the Scheduled Monuments at the Moat House and the Moat. Mitigation barriers are not adequate to prevent pollution, they should be accompanied with landscape screening

f. Safe access to services for the local community and including for users of sustainable transport modes within and to West Cheltenham and North West Cheltenham.

The plan does not sufficiently deliver the sustainable transport modes for West and North West Cheltenham.

**A lack of traffic modelling and assessment information**. As there is a lack of this evidence, it is unclear how improving the junction capacity will improve traffic flow, and queuing on the hard shoulder, in the long term, (post the Joint Core Strategy time period) including any additional development that may be planned on the nearby safeguarded for development land.

The B4634, Hayden Road/Old Gloucester Road, is a very busy rat run, to the A4019 toward Gloucester and needs to be dualled in its own right, to incorporate the new development at Arle Nurseries for over 200 homes, and the proposed development at West Cheltenham.

**Bus routes**: The proposal should clarify any work regarding the reinstatement of the bus shelters along Tewkesbury Road, A4019,

We are surprised that the proposal does not acknowledge the fast and efficient bus service from Cheltenham to Tewkesbury.

**Park and Ride:** The Uckington Park and Ride Scheme, as well as the Elms Park Transport Hub is absent from these new proposals.

It is essential that the scheme can demonstrate that the road network can support such a scheme, to promote these plans for sustainable development.

Why is this, when the West Cheltenham Garden scheme indicates both a Transport Hub and a Park and Ride on the A4019?

**WE DRAW YOUR ATTENTION TO THE LIVE PLANNING APPLICATION FOR ELMS PARK, TRAVEL PLAN 2016.**

 **Their proposals for sustainable transport have not been integrated into this consultation.**

***DOCUMENT - TRAVEL PLAN 2016 Elms Park, P A, Cheltenham***

***Transport Assessment Part 2***

1. ***Aims for Elms Park Public Transport***

*The development is likely to generate a large number of trips [see note; n.b.: these are initial trip estimates, not yet agreed] to / from a wide range of other destinations / origins, but predominantly Cheltenham and Gloucester.*

*· The developers recognise that there is limited spare local highway capacity to absorb additional car traffic from the development.*

*· The transportation proposals for Elms Park will include public transport both to meet the needs of residents and of employees on the site who cannot travel on foot or using their own transport, and also to attract a sufficient number of would-be car drivers in order to mitigate highway congestion effects.*

*· Cycling could play an important role as an access mode to train as Cheltenham railway station would be within easy cycling distance for many residents within the proposed development, also for local travel within Cheltenham.*

***5.3.2 A Transport Hub featuring a local Park and Ride site (P&R)*** *will be provided on the site, not to provide opportunities for residents on the site to complete part of their journey by car, but to intercept many of the vehicles travelling into Cheltenham every day on Tewkesbury Road, the provision of bus priority measures and creating some spare capacity to accommodate the residual traffic generation from Elms Park. There are of course additional benefits to providing more P&R capacity for Cheltenham, such as lowering the pressures on Town Centre parking and also reducing traffic levels in the Town Centre, which in turn can assist in improving the vitality of the town centre.*

***5.3.3*** *The Public Transport offer associated with Elms Park has been developed in partnership with GCC and Stagecoach.*

***Proposed Bus Services***

***5.3.4*** *Following a thorough review of existing service patterns, an analysis of current bus use trends and identification of key trip attractors and generators, the proposed services and their core connectivity functions are as follows*

*Service 40 (new service) - this would connect the Transport Hub, jointly with service 41/42, and part of residential Phase 1 with the town centre.*

*Service 41/42 (revised service) jointly operated with service 40 – this would serve P&R travel to/from the town centre and would be a supplementary service for parts of residential Phase 1.*

***Transport Hub***

***5.3.7*** *The link between the Transport Hub and the town centre will be provided by a combination of the existing service 41/42 and a new service 40. The services would operate a reduced stopping pattern in that between Kingsditch and the town centre they would set-down only inbound and pick-up only outbound. In combination with bus priority along the Tewkesbury Road, attractive journeys times compared to car travel could be achieved.*

*5.3****Public Transport Strategy***

***5.3.1 The availability of high-quality public transport as a real alternative to the private car is a fundamental component of the integrated transport strategy for Elms Park***

*It is essential that residents living on the site have the opportunity to travel into Cheltenham by bus, and those journeys by bus should offer time and cost savings over the equivalent journey by car. Similarly, employees based at the site but living in other areas of Cheltenham, or in Gloucester, Tewkesbury or Bishops Cleeve, should be able to access the site by public transport either directly or via the network of bus services serving Cheltenham Town Centre.*

**4. Other Key Points**

**Coombe Hill**

We note the Coombe Hill element has been removed, but it in fact this plays a vital part of the whole scheme and should be included in the widening of the A4019.

As Coombe Hill has been designated a Service Village in the JCS, and there are already several small industrial developments in the locality, as well as a planning application for housing developments approved at the traffic lights, it is unclear if the proposed alterations will be suitable to accommodate the extra traffic usage. Especially as those residents living in the new developments to the West of Tewkesbury will find it easier to travel along the A38, to access the Motorway at Junction 10.

**Walking and Cycleways:**
The junction should incorporate pedestrian and cycle ways running along the whole of the A4019, to encourage sustainable means of transport, for the proposed new developments.

The Coombe Hill junction should incorporate a bus interchange and a mobility hub.

**Dual Carriageway all of the A4019**It is our recommendation that the A4019 should be dualled for the whole of its length, and a new junction created at the Stoke Road/Old Spot Pub to allow for safe access onto the road, and also to the Boddington Road.

As this is an accident black spot

**Flood prevention:**

We are also very aware of the increase of flooding along the proposed alterations to the A4019. The documents have acknowledged that flooding of the River Chelt flood plain will be altered by the construction of the proposed raised Western Link Road,

We note that several holding ponds have been included in the designs, all on the south side of the A4019. However, the hamlet around Uckington, with listed buildings, is very susceptible to flooding and drainage issues, from the Leigh Brook.
We suggest that additional holding ponds should be constructed in the County Councils field adjacent the houses.

 Yours Sincerely

**Helen Wells**

for Save the Countryside.