

HIGHWAYS, SAFETY & CONVENIENCE ISSUES

BASIS OF OBJECTION TO THE MODIFICATIONS

The Bryncoch Farm Action Committee (BFAC) contends that it is clear from the Inspector's comment on the highways, safety and convenience issues, that she has failed to fully appreciate the adverse effect development of this site would have on existing traffic problems on the approach to Neath; or that having considered them, her decision is fundamentally flawed.

The Council favoured a development of 200 houses at Leiros Park, which the Inspector over-ruled for highways, safety and convenience reasons. However, she approved the similarly sized Bryncoch Farm site, yet both sites would impact in the same way on existing traffic problems on entry to Neath.

EVIDENCE SUPPORTING OUR OBJECTION TO THE MODIFICATION

- The Inspector briefly makes reference to the Council's U.D.P. "Appraisal" of the Bryncoch Farm site in her UDP Inquiry report (par. 8.283) and states:
*"The Appraisal of the site states that **highway access from the A474 would be good, but identifies traffic problems along the entrance to Neath.** However, the Council accepts that those problems (at the Cadoxton Road roundabouts) are capable of resolution to the extent of the 200 dwellings proposed for the Leiros Park allocation site. It follows that, if the Leiros Park allocation were not developed, 200 dwellings could be accommodated without harm to highway safety and convenience elsewhere on the approach to Neath along the A474. The Council makes no other objection to the Bryncoch Farm site. On balance, therefore, the objection is supported"*

**** the highlighting in the above paragraph is that of the Inspector ****

- In total contrast, the Inspector goes into great detail in her consideration relating to the Leiros Park site.

In the UDP inquiry report, section H1/13, sub section 8.78, the Inspector makes the following comment on highway capacity, safety and convenience of the Leiros Park site: *"All traffic to and from the site would use the A474. Vehicles travelling between Neath or the M4 and the site would have to pass through the 2 roundabouts at the junctions of Cadoxton Road/Penywern Road, and Cadoxton Road/B4434. Vehicles using the A4230 Cadoxton Road to or from the A465 or Cadoxton/Cilfrew/Aberdulais or other north-eastern parts of the Borough would also have to pass through the Cadoxton Road/Penywern Road roundabout. The Council acknowledges that these roundabouts and the stretch of road between them are currently over capacity with consequent queuing problems at peak times. However, the Council proposes a scheme of traffic management, public transport improvements and road works, including the dualling of the stretch of road between the 2 roundabouts. The scheme would increase the capacity of the network, so that it would absorb the additional traffic from the 200 dwellings proposed whilst providing for the safety and convenience of road users"*

The Inspector continues (sub.par. 8.79) *".....No transport assessment is included in the evidence. Nevertheless, on the face of it, the proposed allocation (of 200 houses) in itself would not appear likely to have materially harmful effects upon highway capacity, safety and convenience. Even so, it is clear from the available*

evidence that the allocation would give rise to several potential sources of tension concerning various highways related matters”.

In 8.80 the Inspector comments *“that the Council regards 200 dwellings as the maximum that could be served even after its own proposed highway improvements have been carried out”.*

In 8.82 the Inspector goes on *“.....in order to reduce the possible impact of the allocation on the highway network, the Council relies upon measures to promote public transport, to reduce the need to use the car for journeys to nearby schools and to encourage walking or cycling as a means of reaching the centre of Neath. Journeys to school are often made by car, for reasons of perceived safety and convenience”.*

In 8.84 the Inspector comments that *“Much, therefore, hinges on the extension and improvement of public transport to include the site. Its future would be dependent upon subsidy as well as continued use. This item is envisaged as one of several to be paid for out of developer contributions. These would also be required to support extensive highway improvements, education facilities, new footpaths and public open space, all to be funded from the allocation of 200 houses”.*

In 8.87, the Inspector summarizes: *“My conclusion on the highway issue is that the avoidance of potentially harmful effects upon highway capacity, safety and convenience would depend too heavily upon the successful implementation of the proposed highway management scheme, upon the expansion of public transport to serve the site, and upon the persuasion of residential occupiers to use means other than the car for their journeys: and at the same time would depend on the limitation of the proposed development to 200 houses. I consider that success in these matters is unlikely for the reasons given above, including the hilly nature of the site and its approaches, and the likelihood that any increase in the number of dwellings which might be required in order to support the necessary infrastructure would be likely to exceed the threshold of acceptability in highway capacity terms. For highway reasons, therefore, the site should not be allocated”.*

- Our contention is that the Inspector’s conclusion in recommending the Bryncoch Farm site on “highways, safety and convenience” grounds is flawed. In essence, all the Inspector’s comments re. Leiros Parc apply equally to the Bryncoch Farm site. **The Inspector takes two full A4 sheets to comment on and reach a conclusion on the highways issues relating to the Leiros Park site. She takes eight lines to comment on and reach a conclusion on the highways issues relating to the Bryncoch Farm site.**
- The Bryncoch Farm site is situated beyond the existing village of Bryncoch and approximately 2km north of the Leiros Park site, along the A474. Traffic from both sites would feed the “hotspot junctions” identified by the Inspector, and subject of traffic surveys (see later)
- She makes no reference to the school/amenity/bus issues, which she gives some weight to in reaching her conclusion with regard to Leiros Park
- Both sites are served by the same schools, which are not within practicable walking distance and which have little, if any, additional capacity

- The Bryncoch Farm site is only served by a half hourly bus service. The bus service to Bryncoch is believed to be under threat of cutbacks at this present time
- Although Bryncoch village is relatively flat, access from Neath is up a long, steep hill, virtually ruling out bicycle use other than by very fit persons.
- All these issues would render walking unlikely, thus increasing dependence on the car, which contradicts Planning guidelines.

FURTHER EVIDENCE SUPPORTING OBJECTION TO THE MODIFICATION

(1) Household Traffic Use Questionnaire

At a public meeting on 2nd June 2007, 124 household vehicle use questionnaires were completed by randomly selected attendees (copy summary enclosed – see appendix H1). These 124 homes in the locality owned 201 vehicles. 66% of these households never use public transport. Most stated their journeys were made during peak periods to work, school etc., the overwhelming majority travelling to Neath via Penywern Road.

(2) Traffic Surveys

Section 35.1 of “Transport in the Urban Environment 1997” deals with peak hourly flow rates on highways. It states two lane undivided carriageways of the type subject of our local survey should not exceed the following vehicle flow rates per hour (both directions of flow):

Over 6.1 metre road - 1100 veh/hr;

Over 6.75 metre road - 1400 veh/hr;

Over 7.3 metre road - 1700 veh/hr.

Penywern Road is 9.8 metres wide; Cadoxton Road is 7.8 metres wide.

Neath Port Talbot C.B.C. undertook a traffic survey (site NPT05057CR) on Wednesday, 4th May **2005** between 0700 – 1900hrs at mini-roundabout junctions of: (a) A474 Penywern Rd/Cadoxton Rd/A4230/Vale of Neath Business park; and (b) A4230/B4434/A474. The survey was undertaken to record vehicle flows at the junctions. Traffic volumes were recorded on an hourly basis. A copy of this Highways Department survey, together with a covering letter, was supplied to us (see appendix H2/H3/H4). Volunteers from the Bryncoch Farm Action Group undertook a similar survey at this site from 0730 – 0915hrs on Wednesday, 27th June **2007**. The aim of our survey was to calculate: (1) the volume of traffic coming onto the two roundabouts and (2) the traffic flow between the two roundabouts; thereby establishing what change, if any, there has been in traffic volume at this location during the 2 year interval. During this most recent survey, traffic flow increased steadily and from 0750hrs was fairly consistent. The peak traffic flow was between 0815 – 0915hrs. During this hour, traffic flow was as follows:

	2005	2007	% Increase
Onto junction (a)	1714	1894	10.51
Onto junction (b)	1902	2117	11.3
Total traffic converging onto junctions (a) & (b)	3616	4011	10.92
Between (a) & (b) along A4320	1465	1607	9.69

It is immediately apparent from the survey comparisons that there has been a significant increase (over 350 vehicles) in peak traffic volume at the survey site in the past 2 years, and that the recommended vehicle flow rates per hour are being exceeded. It is no wonder that frustrating queues and lengthening journey times are becoming “the norm” for commuters.

High infrastructure development costs would increase pressure for executive housing (and thus 2 car families) on the site. It is reasonable to anticipate 200 extra commuter journeys at peak times (a conservative estimate bearing in mind our housing questionnaire on the previous page) . Thus, the percentage increase in traffic flow since the 2005 survey would rise from 10.92% (actual) to 16.45% (projected) on both junctions, and from 10.51% (actual) to 22.17% (projected) at the bottom of Penywern hill, not allowing for natural increase over time, or other factors we shall come to.

During the survey period, 28 h.g.v.’s (the majority being 4 – 6 axle vehicles of the size that use the Gilfach quarry) descended Penywern hill onto the roundabout. In the NPT 2005 survey, 25 h.g.v.’s were recorded descending the hill. The “Roads in Urban Areas 1976” document states that a h.g.v. or bus etc. at roundabout sites such as these surveyed, should have a passenger car unit (pcu) value of 2.8 (a car has a value of 1.0). For simplification, our survey records hg.v.’s as having a pcu value of 1.0, but their presence is obviously recognized to exacerbate traffic flow problems. Our comparison with the NPT survey figures is actual vehicle totals (neither adjusted for p.c.u. values).

As stated, the Highways Department 2005 survey document came with a covering letter (dated 23.04.07) from Mr. S. Rees, the NPT Head of Engineering & Transport, who states:

- “*The junction is operating at near capacity in peak times under current flows*”. This is an understatement, to say the least. He continues;
- “*However, The Council has no current plans to improve the highways in the area*”.
- “*Any future developments in the area could result in an increase in traffic flow. A developer would have to demonstrate any alteration required to the highway network and fund any improvements required to the highway network and fund any improvements required by the Council as part of the planning process*”.
- “*The cost of such a scheme cannot be determined without details being available, but would depend on its extent, complexity and the need for retaining structures, traffic signals, etc.*”

It is clear from our survey that these junctions are over capacity at peak times. In par. 8.78 of her report, the Inspector states *“The Council acknowledges that these roundabouts and the stretch of road between them are currently over capacity with consequent queuing problems at peak times. However, the Council proposes a scheme of traffic management, public transport improvements and road works, including the dualling of the stretch of road between the 2 roundabouts. The scheme*

would increase the capacity of the network, so that it would absorb the additional traffic from the 200 dwellings proposed whilst providing for the safety and convenience of road users”

The Inspector continues *“the Council regards 200 dwellings as the maximum that could be served even after its own proposed highways improvements had been carried out (par. 8.80)”* In his letter, Mr Rees states *“.....a developer would have to demonstrate any alterations required to the highway network and fund any improvements required by the Council as part of the planning application process. The cost of such a scheme cannot be determined without details being available, but would depend on its extent, complexity and the need for retaining structures, traffic signals, etc.”*

(3) Expansion of School Facilities at Ysgol Hendre, Bryncoch

No mention whatsoever has been made by the Inspector or the Council regarding the significant impact the September 2007 opening of the new school at this location, will have on traffic levels at the Penywern “hotspots” during the morning commuter run. There will be 60 + pupils attending in approximately 20 taxis (travelling both in and out of the site between 8.15am – 8.45am) and about 40 staff. That is 80 vehicle movements. It is reasonable to assume that 50 of these movements will use the “hotspot” roundabouts, adding further to the already significant increase (390) at the roundabouts.

(4) “Dualling” the A4320

There are several issues relating to the proposed “dualling” improvement of the A4320 between the roundabouts.

- Traffic would need to cross lanes on what will be a very short stretch of dual carriageway. For example, traffic from the B4434 bridge wanting to get to the A474 Penywern Road would clash with traffic from the A474 Cadoxton road wanting to get to the Vale of Neath Business Park. Similar problems will occur when travelling west. **This will inevitably lead to crossing and queuing on the short stretch of dual carriageway, thus worsening traffic congestion at peak times, not improving it.**
- The pavement adjacent to the Vale of Neath Business Park is already a caged embankment. Is road widening feasible and cost effective?
- Beyond the roundabouts lies the narrow Swansea – Paddington railway bridge, an insurmountable bottle-neck.
- Would not compulsory purchase of gardens of houses on Cadoxton Road be necessary? This would be a very contentious issue, no doubt leading to lengthy compulsory purchase issues.
- Egress by Cadoxton Road householders would be onto a dual carriageway.
- The pelican crossing would still be necessary, causing congestion.

SUMMARY

- The Inspector and Council acknowledge that 2005 survey figures indicate the peak time traffic flow at the roundabouts as being “at or over capacity with consequent queuing problems at peak times”. Since those comments were made, the BFAC survey shows a 395 vehicle increase during the peak hour.
- **The Inspector failed to consider this significant two year increase in peak time traffic levels.**
- The new school will increase pressure by a further 50 vehicles, totalling 445
- **The Inspector failed to mention, or take into account, the increased traffic generated by the opening of the new special school**
- The Inspector & Council state that a maximum of 200 dwellings could be accommodated if essential highway improvements were made. We make the reasonable assumption, supported by evidence, that 200 executive dwellings will create an extra 200 vehicles converging on Penywern roundabout between 8am – 9am daily. (in addition to the 445 vehicles mentioned in above paragraph).
- The Inspector and Council talk about highway improvements to accommodate 200 dwellings. No consideration of the actual number of cars/ morning commutes generated by these 200 houses has been made. The BFAC has at least produced evidence relating to car numbers/journeys per household.
- **Her consideration on this issue is thus flawed**
- This proposed development is for 200 houses on 8.75 hectares of a 17.5 hectare site. It is our contention that the huge costs of implementing the essential highway infrastructure and sewage improvements etc, which will have to be borne by a potential developer, have very obvious implications. There will be considerable pressure from any developer to recoup development costs by increased housing allocation. This will clash with the Inquiry/ Council findings that even with highway improvements, “200 dwellings is the maximum that could be served”.
- Having declined to allow the development of the Leiros Park site on broadly highway related issues (taking two A4 pages to explain her reasons), the Inspector then removed the Bryncoch Farm site from the Green Wedge, opening it up for potential development (only taking 8 lines to explain her reasons).

- In 8.87 of her report, in rejecting the Leiros Parc site, the Inspector summarizes: *“My conclusion on the highway issue is that the avoidance of potentially harmful effects upon highway capacity, safety and convenience would depend too heavily upon the successful implementation of the proposed highway management scheme, upon the expansion of public transport to serve the site, and upon the persuasion of residential occupiers to use means other than the car for their journeys: and at the same time would depend on the limitation of the proposed development to 200 houses. I consider that success in these matters is unlikely for the reasons given above, including the hilly..... site approaches, and the likelihood that any increase in the number of dwellings which might be required in order to support the necessary infrastructure would be likely to exceed the threshold of acceptability in highway capacity terms. For highway reasons, therefore, the site should not be allocated”*.
- We strongly feel that all of the issues relating to Leiros Parc summarized above by the Inspector, apply equally as strongly to the Bryncoch Farm site. Added to this are the evidence we bring of already increased “peak time” traffic levels with associated queuing , and new school traffic. We do not feel these matters have been given due weight. This impacts very heavily on the finite “peak time” traffic capacity levels of the proposed highways improvements, which we feel would be doomed to failure in dealing with the problems. For all these reasons, we feel that the decision of the Inspector should be over-ruled.