

Highway Congestion

Principal points of objection

Members need to be reminded that this development is **predicated on the delivery of a relief road and school** .

Members also need to be reminded that Welsh Government had, as far back as October 2013, expressed **significant concerns regarding the soundness** of Swansea's proposed LDP , citing **infrastructure and deliverability** as being one of its concerns .

As a result, a Transport Study was undertaken by Arup in December 2015 which concluded that:

- LDP developments will increase traffic movements across the County by 2025, on average, by nearly 30%, with the greatest congestion pressure on the road system being in the NW of the County .
- Network performance could only be acceptably managed if a range of road and public transport measures are put in place , but at the same time recognising that congestion will be worse and journey times longer than the 2014 base date .
- Without the road and public transport enhancements in place, LDP developments will have significant adverse impacts on **traffic delay, traffic congestion, air quality, noise, and economic disbenefits** .

In so far as this application is concerned, the Study further identified the importance of providing a *full north south link road* , ie between Gorseinon Road and the Llanelli Link, as opposed to the shorter link between Gorseinon Road and the A483 .

This alternative shorter link appears to have been considered at the request of the developer despite there being a total restriction imposed by the Council to junctions on the A483 *due to disruption to through flow on a major primary route* .

Important also to this application is the further condition, in accordance with national planning policy guidelines, that was imposed by the Council from the outset that :

*Where transport infrastructure is essential to support developments, **it will be necessary in most cases** for it to be provided in advance of the occupation of the development, **particularly in support of non-car modes of transport** in order to ensure sustainable travel habits are established and embedded from the outset .“*

Arup produced a supplementary report in 2018 that reaffirmed that :

In Northern areas (where significant development is located) mitigation measures should focus on provision of relief roads , as part of site development plans, improvements of junctions on principal corridors, and new junctions associated with

new developments . There should also be an objective to implement extensions to public transport / rapid travel routers to reach or travel through sites .

The proposed late delivery of relief road will, in turn, frustrate any suggested modal shift to non – car modes of transport . The highway situation is further worsened by the likely non - delivery of site SD B and the associated provision for signal enhancements to J47 . **Neither of these matters has been properly factored into this application .**

With all that said, **this application**, which appears to be endorsed by the Council, nevertheless **paints an improving situation to that identified by Arup .**

Remarkably, this is against the background where the Department of Transport in June 2019 released traffic growth figures for the M4 in Wales, and reported in the press that *Motorway congestion is by no means solely a Newport issue. West of Swansea has seen the biggest increase in M4 traffic - up 78% since 2000.*

This reported increase, amounting in total to 72378 vehicle trips per day, related specifically to J47 of the M4 motorway. In addition to this, the Arup Study has already concluded that this figure (vehicle trips per day) will rise further by more than 30% in the next 10 years .

The Local Development Plan identifies that *High value and volume development can provide a means of delivering necessary new infrastructure to **alleviate existing capacity problems** whilst providing facilities and infrastructure to support new proposals.*

Parc Mawr Farm is intended to be such a development.

However, as already identified by Arup this ambition could never be realised.

More importantly, and of far more significance to this submission, the planning application totally disregards the importance played in respect of the deliverability of this infrastructure, and its resulting adverse impact upon the highway network. The application proposes that the completion of the relief road will be concurrent with the completion of the housing development. Based on housing trajectories included within the Plan, and taking on board delays that have already occurred, the earliest likely completion date for the relief road will be 2029-2030.

This is totally contrary to the undertakings given by both Bellway and the Council to the LDP Inspectors that key infrastructure such as the road and new school will be delivered as part of the initial phases .

As already stated, the Study identifies that:

*Without the road and public transport enhancements in place, LDP developments will have significant adverse impacts on **traffic delay, traffic congestion, air quality, noise, and economic disbenefits.***

These are the exact conditions that will result from this planning application.

Concerns have also been raised over the proposed design of the intended relief road, and its ability to encourage the required assignment of traffic from the J47. Jacobs, acting for Transport for Wales, have responded to this planning application by stating:

However, the Spine Road is shown on submitted masterplans following a rather torturous alignment, in the context of a residential distributor than a direct and viable alternative to existing routes. As such its attraction as an alternative to travelling via J47 is questionable.

Jacobs concluded their report by saying:

Concerns remain about the impact of the re-assignment of traffic away from J47 because of the Spine Road through the development being open to traffic. The impact of the development at J47 is directly impacted by the operation of this new road, and thus the assumptions made by the applicant in the TA for this reassignment of background traffic. There are no technical justifications used by the applicant for this reassignment of traffic beyond the use of their 'professional judgement' which in the absence of any additional information is not an accepted methodology.

The failure of this application to embrace the idea of traffic assignment away from J47 of the M4 motorway, together with greater problem posed by the additional 850 houses proposed by this application, will have far greater consequences on the highway network than even the traffic study would suggest.