TEMPLE GUITING PARISH COUNCIL

Comments on the Gloucestershire County Council Local Transport Plan

Temple Guiting Parish Council has reviewed the draft Gloucestershire County Council Local Transport Plan and has the following comments on Policy Document 3 - Freight Policy and Policy Document 4 — Highways and the 'Connecting Places Strategy':

Policy Document 3 – Freight Policy

1. North Cotswold routes excluded from the plan

Roads and traffic in the North Cotswold have not been included in any part of the plan. This is despite the siting of 7 sources of HGV quarry traffic and a strong tourist industry which relies on the characteristics of the Cotswolds, that is, the tranquility (defined in the Cotswold AONB Management Plan as 'a state of calm and quietude experienced in .. mainly natural features and activities, free from disturbance from man made ones.') and the natural amenities and cultural values of the area.

2. Increasing HGV traffic

Unlike other parts of Gloucestershire, which the plan says is experiencing a 20% drop in HGV movements, the North Cotswold area has experienced a doubling over the past 5-7 years (data derived from quarry planning applications). More precise data is not available so, for example, the percentage of traffic classified as HGV is unknown.

3. Lack of data to enable planning

There is a lack of data covering the full extent of HGV movements within the North Cotswold area. Without this data it is difficult to see how traffic can be managed.

While limits on the number of lorry movements sometimes form one of the terms of the planning permits for individual quarries, there is no overall limit to the volume of HGV traffic in the area. Most of the roads here are rural and not designed for heavy traffic either in terms of their construction methods or in their size. They were also not designed for the current volume of HGV movements.

Quarries admit to regular over quarrying, resulting in higher numbers of HGVs than permitted in their licenses. So actual figures taken at the roadside are critical to an understanding of traffic flows in the area.

4. Sat navs and 'Lorry Watch'

Paragraph 2.10 states that once off the A roads sat navs are used and sometimes these lead drivers to inappropriate roads. The solution offered is to use 'Lorry Watch', a system whereby local residents record lorry movements and report them to a parish or town council co-ordinator for forwarding to Trading Standards (Policy LTP PD 3.2). Local residents are not aware of this service and, on those occasions where drivers have been approached, they claim to be delivering in the area. It is also very difficult to note down details while driving or walking on roads used by HGVs so this is not a very workable solution.

5. Better Driving Practice

Three new codes of practice are mentioned in par 6.1.4, which GCC hopes operators will adopt, however there is no incentive for them to do so. Without incentives or penalties, the likelihood of the codes being adopted is low.

Policy Document 4 - Highways

The plan recognises that lack of management of highways issues can have negative consequences on local communities. For example, Par 5.3.6 "Road safety concerns damage social wellbeing'; " Safety issues, whether perceived or actual, can also form a barrier to the use of more sustainable modes, including cycling, walking and public transport."

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In addition, the objectives of the Highways chapter are given as: "Protect and enhance the natural and built environment; Support sustainable economic growth.. including a thriving tourist industry;. Improve community health and well-being by ... improving air quality ... better safety, security and health."

Yet Par 5.3.9 states "There is a risk (particularly in outlying rural areas) that road conditions may deteriorate, contributing to heightened safety risk to users." And in the Delivery section of the plan, PI 5 says that "the target is to maintain the percentage of non-principal classified road network where maintenance should be considered at or below 18%" and at 9% for non principal roads. This indicates that the aims and the delivery of the plan should be more closely aligned.

TGPC welcomes the council's commitment to lobbying for the decriminalisation of the enforcement of moving traffic offences as this would enable local people to become more involved in identifying and acting on traffic contraventions.

TGPC also welcomes the notes in 4.4 and 6.3 which states that GCC will support communities to deliver local speed campaigns through local policing teams, but we have not seen this support yet.

The review of winter maintenance and vegetation clearance in line with Highways Biodiversity Guidance is also welcomed, but summer clearance policies should also be included. Despite GCC guidance stating that verges should not be mowed until after August (after seed has set) verges are regularly mown from early summer onwards and clippings left on the verge.

Connecting Places Strategy CPS3 North Cotswold

This document confirms what residents and visitors already know. Par 5.26 says: "A consequence of the rural nature of the area coupled with the standard of many of the roads, results in the disproportionate impact of HGVs on many local communities". The document then goes on to say that technology may be part of the solution as it could reroute HGV traffic away from key pinch points, in this case, Stow Unicorn Junction and the Moreton in Marsh double mini roundabouts and overbridge. However, it is unlikely that these pinch points can be eased by diversion as there would need to be roads of an equivalent or better standard onto which to divert the traffic. There are no such roads in the immediate area. Any diversions could only take HGVs onto smaller roads, worsening an already difficult situation.

Proposal for management of HGV movements in the North Cotswold area

1. Reasons for a managed area

It is clear that the Transport Plan does not address the transport issues generated by the quarry industry in the North Cotswold area., where increases in quarrying activities, particularly aggregate production, have taken HGV movements to new high levels not seen before. This is causing a reduction in both amenity and peace and tranquility - specific attributes of the Cotswold AONB.

A balance needs to be found between preserving the qualities of the AONB; addressing visitor and resident concerns; and the need for quarrying activities required to preserve the character of the area, with the production of some aggregate at an appropriate scale.

Temple Guiting Parish Council met GCC Minerals Planning Authority and GCC Highways on 20th January 2020 and at the Quarry Stakeholder Meeting organised by the Cotswold Conservation Board (CCB) held at Toddington Village Hall on 29th January 2020. At these meetings, there was consensus that HGV movements associated with quarrying operations in the North Cotswold AONB should be addressed in the GCC Transport Plan. Although inclusion in the GCC Minerals Local Plan was considered, that document is in its final stages and it would be difficult to change at this point.

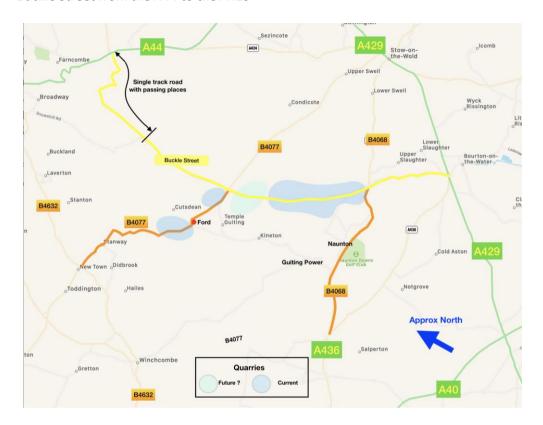
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2. Area and routes to be managed

The specific area affected is illustrated in Figure 1 and includes the following primary routes:

- * B4077 from Toddington Roundabout to Buckle Street
- * B4068 from the A436 to Buckle Street
- * Buckle Street from the A44 to the A429



The managed area should also address minor roads from the B4077, including the unclassified road from the B4077 to the B4068 via Temple Guiting. Although this is signposted as unsuitable for HGVs it has been subjected to HGV drivers following satellite navigation systems rather than designated routes to and from quarries. This problem is recognized in the Transport Plan as a common issue throughout the District and updated satellite systems are offered as a solution.

3. Aims of the proposed HGV Management Zone

The proposed area is small, with few entry and exit points, making monitoring (using technology) a manageable task. This is in contrast to the Cotswold Lorry Management Area further south which was far larger and had far more points of entry. The aim of the Cotswold LMA was to prevent vehicles over 7.5 Tonnes from entering the zone, while the North Cotswold zone recognises that quarry HGV movements are inevitable and its aims could include management of:

- * Overall volume of quarry HGV movements
- * Hours of operation
- Designated routes
- * Driver Code of Conduct
- * Reduced speed of HGVs along the length of Buckle Street and the B4077
- Reduced vehicle emissions
- * Other items as they become apparent.

The Quarry Stakeholder Steering Group proposed by CCB, with representation form quarry operators, local Parish Councils and GCC Planning and Enforcement Officers, would be an ideal forum in which to develop and deliver this Zone. This framework for HGV movements in the area would be managed through a voluntary code of practice, although the option of enforcement could be investigated.

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