

**Subject:** FW: P22/01300/O Land At Sodbury Road Wickwar

<b>Application Number:</b>	<b>P22/01300/O</b>	<b>Grid Reference:</b>	<b>372484 187898</b>
<b>Date Registered:</b>	<b>22nd March 2022</b>	<b>Consultation Response Date:</b>	<b>12th April 2022</b>
<b>Location:</b>	Land At Sodbury Road Wickwar South Gloucestershire GL12 8PG		
<b>Proposal:</b>	Erection of up to 180 dwellings, a local shop and associated infrastructure (Outline) with access to be determined; all other matters reserved.		
<b>Applicant:</b>	Bloor Homes South West		

We note the outline application is for up to 180 dwellings with a local shop of 200 square metres on just under 8 hectares of agricultural land to the east of the B4060 Sodbury Road. The outline application requires the access to be determined with all other matters to form part of reserve matters applications.

An EIA screening opinion was requested for this site and whilst there were no formal pre-application discussions on the scope of the transport assessment, recommendations for what should be included in the assessment was provided by SGC.

We note that the application form doesn't specify the dwelling sizes by bedroom number, and also shows 243 residential units in terms of net gain which is 63 more than the description above. We would appreciate clarification on this and for the purposes of our comments have taken 180 dwellings to be the proposal.

We note the Transport Assessment dated 7th December 2021; the Residential Travel Plan dated 22nd February 2022 and the Design and Access Statement including its Access and Movement and Facilities and Services sections.

### Existing Facilities

The Design and Access Statement includes 9 named facilities within a 15 minute as the crow flies walking distance, appreciating that, as highlighted in para 5.23 of the PSP Local Plan, actual walking distances to these few facilities will be greater and the quality of route needs to be considered. The infrastructure proposals do not suggest additional or separate accesses for pedestrians and cyclists and do not appear to consider infrastructure beyond the site's boundary – i.e. there is no external mitigation proposed.

The facilities within the plans shown in the Design and Access Statement include the primary school; a coffee shop; an inn; a social club; the village hall (labelled as the town hall); as well as two churches; a care home; and playing fields. The facilities are limited to certain activities and do not include several in the range of facilities shown in PSP 11 which is assessed in Table 5.3 of the Transport Assessment, and agreed that these facilities would require modes other than walking or cycling.

The proposed pedestrian route to the primary school is not set out in the assessment and as there is limited potential for non-car travel, the proposed route(s) need to be described and assessed in terms of safe walking route to school criteria as well as its timing should parents or guardians intend continuing their journey to work for example.

## Modal Share

We note that the National Travel Survey from 2016 is included in the Transport Assessment where it suggests that nationally on average 51% of primary school pupils walk to school with 41% travelling by car and 5% by bus. We would recommend that in order to understand the likely walking levels from this development to the school, that the school's actual modal share is reviewed given it is a village school that doesn't just serve the village. A safe route needs to be identified including appropriate infrastructure along the route and for crossing the main road.

There is very limited walking infrastructure in Wickwar - limited to its built form and no cycling network in terms of routes with cycling infrastructure to encourage that mode - the Avon Cycleway is mentioned in the Transport Assessment which runs east/ west through the north of Wickwar, however this leisure route in this area is on the highway rather than segregated from traffic, and could not be considered more than a leisure route for experienced cyclists rather than the wider range including less experienced and less confident cyclists that we and central government through its Active Travel England are seeking to encourage.

## Public Transport

The Transport Assessment has extracted elements of Policy PSP11 in terms of the [absolute] minimum bus service that could be considered acceptable for development in a rural location, and suggests the bus service to be appropriate. No assessment of available capacity has been made, nor how the service fits in with the predicted demand noting the proposed distribution northbound and southbound from the site.

Noting paragraph 5.25 from Policy PSP 11 of the Local Plan, for such a substantial development the public transport provision is in officers view, in need of significant improvement to have some chance of avoiding car dominated modal share for journeys to and from this development.

**"5.25 The larger the development proposal and, or the larger the reliance on public transport to access key facilities and services, the more frequent and extensive a bus service will be required, in order to avoid a reliance on private car journeys."**

The development's location and distance from the majority of facilities is likely to mean car will be the travel mode of choice from this development without improvement to sustainable travel infrastructure and services. The infrequent and subsidised bus services on the elongated clockwise and anti-clockwise circuits to serve local villages and hamlets does not offer a realistic choice for many journeys. For this scale of development much better public transport provision is needed to encourage a non-car dominated development.

The train station at Yate is also referenced including its services. The TA suggests it is "*approximately 7km walking distance to the south of the development*", though in reality it is not walkable as there is no infrastructure to safely walk towards the boundary of Yate where there are footways. We would like this questionable reference to be clarified.

## Highway Impact Assessments

A number of assessments have been provided for the site, using traffic survey information from the Horwood application carried out in 2016. This information is considered to be too old and requires new surveys. Any assessment requires the modelling files to be provided for review, together with any calculations (plans confirming geometries; where relevant signal settings; intergreen times etc. )

The consented development in Wickwar is the only information considered by the applicant. A review of influencing developments is needed including the North Yate New Neighbourhood which continues on its build programme.

The High Street shuttle working has been simplistically assessed with PICADY. This signalised shuttle working requires a validated base model that replicates the queuing found in morning and evening peaks for the development traffic to be considered further. The current form of assessment is considered inadequate and its results misleading.

The motorway junction 14 of the M5 has not been assessed, and it is required to be. National Highways may require this in their response.

## Mitigation

We note that the developments sole mitigation is a travel plan. In order for the development to be acceptable in transport planning terms, it needs to demonstrate its sustainability credentials, and there is inadequate information provided on this suggesting that the site is not sustainable without mitigation.

## Summary

We have reservations, similar to those raised on the now consented developments to the west of the B4060, which are that Wickwar has limited facilities meaning that for the majority of needs, future residents will need to travel, and that travel from this development which is distanced from the centre of Wickwar is likely to be dominated by car-based travel without significant improvement to the bus services and walking and cycling infrastructure, and ideally with other development uses coming forward in the future to help offer local facilities to contain travel movement.

The assessment provided does not include sufficient technical information in terms of highway impact appraisal, and requires further information on sustainable travel options and likely use. We therefore cannot determine the application without additional information and place a holding objection to the proposal.

Kind Regards

Myles

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