

<b>Application Number:</b>	P22/01300/O
<b>Date Registered:</b>	22nd March 2022
<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

The outline application is for up to 180 dwellings with a local shop whose size is described differently in different documents, located 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 (the) future reserve matters application(s).

We note the developer has requested an appeal by Public Inquiry through non determination of the application. This element of the review is from the Transport Development Control team on behalf of the Local Highway Authority (referenced by the Appellant as “Highways Team” in its appeal documentation).

At the point the Appeal was requested there are matters that we understood were being undertaken by the Appellant, including:

- confirming proposed bus services and contributions towards their operation, including formal agreement to WECA’s requirement for £450K public transport subsidy for five years (totalling to £2.25M) or alternative proposal;
- incorporating SGC comments recommended to improve the Travel Plan.

No updates have been provided or information shared, so our position is therefore informed only by what has been set out formally in writing by the Appellant.

## Existing Facilities, Sustainable Travel and PSP11

### Policy PSP 11

Our main local transport policy to help evaluate or determine the proximity of services and facilities in order to understand how walkable, or cyclable they are, is Policy PSP 11 of the Policy Sites and Places Local Plan (Adopted November 2017). Policy PSP11 is named as Transport Impact Management.

It is noted that in the Appellants *Statement of Case* this policy is referenced as “*deemed to be out-of-date*”, and references the Planning Inspector’s report [para 46] for the Land South of Badminton Road, Old Sodbury Appeal Decision APP/P0119/W/22/3303905. As a witness at that Inquiry, I do not recall any such conclusion or suggestion, and cannot see the equivalent reasoning set out (as inferred in the decision reference to the “*first main issue*” of the Inspector’s report). I do not accept the policy to be out of date and as there has to be an agreed methodology for assessing the proximity of facilities and the likelihood of walking or cycling, PSP11 seems the most appropriate measure for this.

### Data and Access Profiles

In 2020 South Gloucestershire Council reviewed settlements through its Data and Access Profiles, which updated work carried out in 2018 then called Sustainable Access Profiles. These relate to the Table on Page 36 of the PSP11 which shows the facilities and services required to meet day to day needs and appropriate distances to encourage travel by walking or cycling.

In the review of 2020 and 2018, which measures outward from the centre of the village of Wickwar, the number of facilities recognised by the Council as being “Key” to meeting day to day needs included (at that time) eight facilities in 2020, reduced from 10 in 2018, and a match for five of the 16 facilities, appreciating there is overlap of themes.

**Table of Facilities in Wickwar, measured from centre of the village**

Facility	Walking & Cycling Distance	Number within Catchment 2020	Number within Catchment 2018
Dedicated Community Centre	800m	3	3
Library		0	0
Post Office		0	1
Public House		1	1
GP Surgery		0	0
Pharmacy		0	0
Dentists		0	0
Comparison Retail Store <sup>1</sup>	1,200m	1	1
Designated Town Centre		0	0
Superstore		0	0
Convenience Store <sup>2</sup>		0	1
Employment – Town Centre	2,000m	0	0
Major Employers		0	0
Safeguarded Employment Areas		2	2
Primary School	2 miles	1	1
Secondary School	3 miles	0	0
<b>Sub Total</b>		<b>8</b>	<b>10</b>
Superfast Broadband	n/a	Yes	Yes
Train Station/ Service	2,000m	0	0

Notes: 1 - Comparison Retail Store is a shop selling goods and service other than food e.g. hairdresser or garage; 2 - Convenience Store is smaller shop selling everyday basic food and drink items e.g. bread, milk

Public transport was also assessed which showed the former 84/85 service connectivity to Yate and Wotton-Under-Edge as well as the 63A service. All of these subsidised services have been withdrawn.

### Proposed Development

The equivalent table (Table 5.4) within the Transport Assessment shows only community centres and the primary school to be within the PSP11 appropriate distances, though the employment areas at the Old Cider Mill and Arnolds Fields Trading Estates are within PSP distances suggesting only three of the 16 elements are satisfied.

However, the development also proposes a shop to serve local needs located to the south of the site / furthest from the village centre. It is described differently in different application documents including from 100m<sup>2</sup> farm shop in the Transport Assessment; a local shop of 200m<sup>2</sup> in the Highway Consultation Response; to *“a local shop (of no more than 1,000m<sup>2</sup>) to serve the community and provide local retail which is currently missing in the village”* in the Planning Statement; and similarly in the revised Design and Access Statement. The mixed use provision, if taken forward, helps with travel containment and is supported should planning consent be approved. However we understand that we cannot condition that the shop is provided, and without the shop it will add to onward travel to more distant destinations for the many services and facilities not found locally.

### Safe Route to School and Walking Accessibility

We requested, and the Appellant carried out an assessment of the surrounding walking infrastructure through a WCHAR (Walking, Cycling and Horse Riding Assessment) assessment as part of ensuring there would be a safe route to walk to school. The assessment came up with a number of potential pedestrian improvements including dropped kerbs and footway widening. No cycling opportunities were noted, other than identifying those already included as part of the recent developments on the east side of Sodbury Road, and no horse riding opportunities were identified.

No footway widening was included in the off-site mitigation proposals and Drawing 7909-SK04 Rev 1 shows the proposed dropped kerb proposals together with a Wayfinding scheme on the proposed route to the school. Wayfinding schemes are more normally found in larger towns and cities and the need for a wayfinding scheme in the village of Wickwar reflects the location of the development which is within potential walking distance to the school, but the route would not be obvious without local knowledge.

Footways within Wickwar vary considerably, and the proposed routes to school would exit the northern site access and continue northwards to the roundabout at Amberley Way. Route 1 then crosses the road via the existing uncontrolled island with dropped kerbs to continue along Amberley Way. Route 2 continues along Sodbury Road, past the Citroen garage to cross the road to the pedestrian route leading to the Amberley Way spur, and the third route continues further on the main B4060 to cross at Ingleston Road. Neither route 2 or 3 have pedestrian crossing infrastructure of the B4060 so Route 1 would be the preferred route, and that is where the wayfinding information will direct.

### Public Transport

As historically advised to the Appellant team, the then likely potential of existing bus services being discontinued has become a reality with services 84 and 85 stopped on 1<sup>st</sup> June 2023. The services were used as the Appellants basis of accessibility by sustainable modes to facilities not found locally: the Transport Assessment 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 suggested the now removed bus service to be appropriate. No assessment was made of available capacity, nor how the service would have fitted in with the predicted demand noting the proposed distribution northbound and southbound from the site. The TDC view was that the historic bus service was inadequate for a development of this scale and would not encourage its use.

The appellants are proposing a zebra crossing of the B4060 at its southern entrance; and a southbound bus stop where the zebra crossing leads to. This infrastructure would be helpful however it also requires a bus service of appropriate scale and frequency to offer a realistic alternative to serve the development.

Noting paragraph 5.25 from Policy PSP 11 of the Local Plan, for such a substantial development the public transport provision requires 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."*

Whilst Dynamic Demand Responsive Transport (DDRT) has recently been introduced in the area instead of the previous supported services, its operational performance and reliability from a users perspective is still being assessed. The DDRT cannot be suggested to be a replacement or betterment to the 84/85 service, which in itself was infrequent. 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, so for this scale of development much better public transport provision is needed to encourage a non-car dominated development.

WECA have requested a bus service subsidy of £450,000 per annum for five years from this development, and we support the requirement for an improved bus service as part of this development. No reference has been made to this request in the more recent information, and whilst the discussions in April led us to understand that the Appellant was seeking an alternative bus service and costing through direct discussions with operators, nothing has been formally submitted.

An appropriately frequent bus service, including evenings and weekends to facilities in Yate would offer an alternative to car based travel for future residents. Without a suitable bus service, the development is most likely to be car dominated and therefore conflict with Policy CS8 of the Core Strategy.

### **Modal Share and Car Dominance**

Walking and cycling offer limited options in Wickwar because of limited facilities and significant distances; relatively poor pedestrian infrastructure with narrow footways, missing sections of footway, and few road crossing points; and no cycling specific infrastructure other than the small elements included as part of the new developments on the east side of Sodbury Road.

Unless bus services are improved the likelihood is that cars will be the preferred mode of choice for residents in and visitors to the new development, conflicting with Policy CS8 of the Core Strategy. Car dominated development is not defined and comes down to judgement, but it is most likely that where travel is needed, cars will be used unless bus services are provided and unless the travel plan is pro-actively engaged.

## 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 many facilities is likely to lead to car dominated travel unless there is significant improvement to the bus services and walking and cycling infrastructure.

The Appellant is proposing mitigation measures for walking infrastructure to the school, and is proposing a zebra crossing of Sodbury Road and a new bus stop, as well as a new shop as part of the development. An appropriately frequent bus service is needed to help offer new residents the choice of sustainable travel to facilities and services not found locally.

We therefore require the confirmation of a funding a new bus service to make the development acceptable in transport planning terms. Without this commitment we believe the development will be car dominated and therefore be in conflict with Core Strategy Policy CS8 and Policy PSP11.