

Comments Re: Wiltshire Council Planning Application

Reference: PL/2023/10331

Proposed Residential Development on Land South of The Forty, Cricklade

Rationale and Introduction

I offer the following comments as a Cricklade resident of more than 24 years. I live approximately 200 yards from The Forty and have walked along the road at least four times every day for a number of years. Thus I have an intimate knowledge of The Forty and its residents, also of the surrounding area and traffic flows, both vehicular and pedestrian.

I was disappointed that the List of Neighbours Notified attached to the planning application shows only six addresses in The Forty. This is a serious omission because the works subject of the application will, if approved, fundamentally change the character and use of this road with arguably adverse effects on its amenity value to all residents and users, for reasons given below. I suggest that all remaining households in The Forty, Carpenters and Ockwells (both of which feed directly onto The Forty) should be notified, with an extension to the consultation period.

A number of pre-existing road safety issues present on The Forty and adjacent roads. I believe these will be exacerbated by the planned development, if approved. My concerns are primarily highway safety, but also the accuracy of information which seems somewhat lacking in the development proposals. These comments and observations are supported by my practical experience in road traffic matters, highway safety and the management of road traffic incidents including, unfortunately, fatalities, as a former police officer.

Having carefully studied the many documents associated with this planning application, I am concerned at the number of errors and/or inaccuracies when compared with the local reality. I will highlight some of these in due course.

It appears that the Applicant views The Forty as merely an access for the proposed development. The proposals reflect a less-than-thorough understanding of the nature and current use of this road, or the impact of the proposed development on local residents and road users.

Regrettably I was unable to attend the public consultation held in Cricklade on 14 July 2023 due to a death in the family that day. Although the Applicant claims that road safety measures have been incorporated as a result of the public consultation, I believe these to be inadequate, having regard for all the relevant circumstances.

The Forty

As already mentioned, I have a detailed knowledge of this road and its environs. I am familiar with a number of its residents and many other local users of the road. The Forty can best be described as a rural residential road. Properties fronting on to this road tend to be widely spaced and there is a length of roadway without any frontages on the northern side but backed onto by fenced properties, some with gated access to the Forty, in the adjacent Pittsfield residential complex.

In addition to vehicular traffic The Forty is much used by residents on foot – several of whom require walking aids – by horse riders, cyclists, recreational walkers including families and many dog owners, joggers, parents/grandparents taking children to and from primary school and older students making their way to and from school bus stops. This is also a regular pedestrian route for residents of Chelworth Road, proceeding to and from bus stops and the Cricklade High Street area. The Applicant appears unaware of this information.

Existing Hazards

Apart from a very short footway at the Purton Road end there are neither footways nor grass verges useable by pedestrians along The Forty, so everyone has to walk on the carriageway. There are usually vehicles parked at the roadside and pedestrians have to walk into the centre of the road to pass them. In such circumstances there is potential conflict between pedestrians and oncoming motor vehicles.

The narrowest part of The Forty, with poorest visibility is the western end between Church Walk and The Fiddle. The Applicant states the width of The Forty as ‘approximately 5m’; however the Church Walk-to Fiddle section, most heavily used by pedestrians and animals, measures barely 4m in width. This approximately 70 yards long section is bordered on its northern side by a garden fence and high boundary hedge, tight to the roadway, On the southern side of the road in this area there is a rough, uneven grass verge bordered by a deep overgrown ditch. The verge is often heavily rutted by westbound vehicles pulling over for oncoming traffic to pass, or sometimes even parking.

The photograph on Page 52 of the Applicant’s Transport Statement (TS) illustrates the true nature of The Forty at this location, looking westward. Figure 9 on Page 14 of the TS shows the same section from a slightly different perspective, close to the proposed site entrance. In the latter photograph the left-hand grass verge seems to have been trimmed short whereas it is usually rough and overgrown.

It is clear from these photographs that there is no safe margin for foot traffic, given also the blind bend at Forty/Fiddle/Chelworth Road junction. Nevertheless, this roadway is heavily used by dog walkers, joggers, horse riders and others as part of an exercise circuit comprising The Fiddle, The Forty, Purton Road (B4553), Malmesbury Road (B4040) and

further afield. It is also used by Chelworth Road residents walking to and from school, bus stops and the High Street.

Given the above it seems surprising that the Applicant has chosen this somewhat difficult location as the point of access/egress for the proposed development site.

Proposed Mitigation Measures

I note that the Applicant, apparently in response to the aforementioned public consultation, proposes some road alterations in this area. Traffic calming may serve to slightly reduce vehicle speeds between the proposed 'raised tables' at both ends of the narrowest section of carriageway. However it fails to add any protection for humans and animals against increased vehicular traffic and, notably, heavy construction vehicles associated with the proposed development site.

It will be impractical to consider installing a footway on the northern side of The Forty between Church Walk and The Fiddle. This would only further reduce the carriageway width, which is already too narrow for large vehicles to pass each other. Similarly, replacing the grass verge with a new hard footway on the southern side between the proposed site entrance and the Fiddle junction would require pedestrians wishing to proceed from The Fiddle to The Forty, and vice versa, crossing the Forty at the poorly sighted Forty/Fiddle/Chelworth Road 'S' bends. No pedestrian crossing can resolve this problem.

Moreover, a new footway on either side would do nothing for the safety of horse riders who must in any case walk on the carriageway, mixing with increased vehicular traffic including construction vehicles.

The proposed narrowing of the section of The Fiddle approaching The Forty/Chelworth Road junction may marginally improve visibility for vehicular traffic. However it will have significantly adverse impact on pedestrians, positioning them closer to vehicles at a point where there is no footway. The present, unaltered, junction is wide enough to afford good visibility and a measure of safety for pedestrians and animals, especially those moving between The Fiddle and The Forty. I view the proposed highway alterations as a retrograde step posing safety issues for foot traffic.

The application features a raised crossing point for residents of the proposed development with a short footway linking this to foot traffic from the adjacent Hitchings footway. This may be helpful for those particular residents but there appears to be no consideration to safeguard the bulk of pedestrian and animal traffic (which passes along rather than across The Forty) from increased motor traffic and, particularly heavy motor vehicles. The raised tables will also have no effect on vehicle speeds eastward on The Forty, i.e. towards Purton Road, from this point. I'll address the matter of vehicular traffic and speeds below.

Vehicular Traffic

The current low density of housing along The Forty means that the volume of vehicles driven by its residents is not currently significant. However, the road is much used as a 'Rat Run' by workers at the nearby Chelworth Industrial Estate whose motor vehicles often travel in 'clusters' at speed around the time of shift changes. The road is also much travelled by delivery drivers servicing the industrial estate and making domestic deliveries to The Forty, The Fiddle, Chelworth Road and cutting through between the Purton and Malmesbury Roads. Many delivery drivers, operating on tight schedules, appear to exceed the safe speed without regard for other road users.

The Forty is subject to a 7.5t weight limit and 30 mph speed limit, neither of which are monitored or enforced. Although vehicles over 7.5t are permitted for access only, this road is clearly unsuitable for construction site traffic, such as may be required to service the proposed housing development. The same applies to the adjacent road: The Fiddle, which is in places narrower than The Forty, has no pedestrian footway for at least 70 yards from the Fiddle/Forty junction and has previously been designated as a 'no-go' route for construction traffic.

Referring to 3.3 of the Design and Access Statement, the Applicants' estimates for vehicular traffic to and from the development site, when completed, appear unrealistically low. The Applicant states "The proposals for up to 49 dwellings have been assessed to generate 30 two-way vehicle trips in the AM peak hour (08:00 – 09:00) and 32 two way vehicle trips in the PM peak hour (17:00 – 18:00)."

I suggest that the most accurate way to evaluate this statement is to examine private vehicle use at Hitchings, Cricklade, being the most recent housing development in the area. I submit that real time information from Hitchings is of significantly greater value than the copious generalised desk researched data quoted in the Planning Application.

Hitchings is immediately adjacent to the Applicant's proposed development site. I regularly walk through Hitchings at various times on weekends and weekdays and observe that virtually all properties therein have two motor vehicles. Some have additional motorhomes or campervans and/or commercial vehicles. It seems reasonable, therefore, to believe that each of the 49 dwellings on the Applicant's proposed development site will also have two motor vehicles on average or about 98 in total. The number would likely increase to at least 150 within a few years.

My own observations at Hitchings indicate that approximately 20% of 'resident' motor vehicles remain there during normal working hours on weekdays. Therefore we may assume that the other 80% were driven away before or during the morning peak period. Translating these observations to the proposed new development: $98 - 20\% = 78$, i.e. $2\frac{1}{2}$ times the Applicant's estimated traffic volume during morning and afternoon peak hours, respectively. An additional $78 \times 2 = 156$ vehicle movements during peak periods represents a significant traffic increase on The Forty arising from the proposed development, not to mention visiting traffic at these and other times during each day.

This will surely impact on The Forty's residents, and particularly on foot travellers moving along the road.

Away from the problematic narrow road section at The Forty's western end, which incorporates the proposed development site access road, the carriageway towards the Purton Road junction is a little wider (approx 5m as stated by the Applicant) and straight, giving rise to increased vehicle speeds, notably by through traffic. From personal observation (and bearing in mind my police training in accurately estimating vehicle speeds for purposes of prosecution) I can confirm that motor vehicles regularly exceed the 30 mph limit.

The Evoke traffic counts incorporated in the Applicant's Traffic Statement confirm 85th percentile speeds along The Forty exceeding the 30 mph limit. The Applicant states that site access road visibility splays have been designed to provide adequate visibility according to the 85th percentile speeds of 31 mph (eastbound) and 33.3 mph (westbound). However, the Evoke ATC data forming part of the Transport Statement identify vehicles travelling at between 36 and 46 mph. The Applicant's plan cannot be correct, therefore, if it excludes measures to safeguard against these significantly higher speeds.

Neither can the Applicant's following statement (3.6.4 of the TS): "It is therefore considered that there are no existing road safety issues identified within the vicinity of the site which may be exacerbated as a result of the proposed development" be sustained.

The Forty/Purton Road Junction

The Transport Statement notes restricted visibility for vehicles turning into the B4553 Purton Road at the eastern end of The Forty. This is caused by residential properties on both corners of The Forty/Purton Road with narrow public footways on the road edge.

The Applicant's solution for dealing with increased vehicle numbers caused by the proposed residential development seems to be new road works to improve visibility, effectively moving the junction forward into the already-not-very-wide Purton Road. Despite the current 30 mph speed limit on Purton Road I can confirm from recent observations that this limit is regularly exceeded. The road is also heavily used by goods and construction vehicles travelling to and from the Chelworth Industrial Estate.

I have not experienced any problems when walking the footways alongside Purton Road, which are indeed narrow in parts, with two large dogs. I do have concerns that extending the width of footways in Purton Road will further narrow the carriageway, effectively putting large vehicles closer to pedestrians and subjecting them to road spray and salt spray during inclement weather.

Purton Road at this point has been subject to frequent road works in recent years, notably caused by various utility companies. Traffic has been repeatedly disrupted, delayed and diverted on this stretch by lengthy road closures and one way traffic light controls. In the latter case this has resulted in traffic tailbacks across (and blocking) the Malmesbury Road roundabout and bus stop, extending along the High Street to and around the High Street/Calcutt Street mini roundabout.

It is difficult to foresee any justification for yet more delays, disruptions and mess which would undoubtedly be caused by the planned works at the Forty/Purton Road junction.

The fact that new road works are proposed there does, however, confirm that the Applicant recognises highway safety will be compromised by the additional volume of vehicles associated with the residential development.

Site Accessibility

The walking times listed in the planning application are ambitious, to say the least.

Walking at my habitual rate of 120 paces per minute (approximately 4 mph) I can hardly achieve those times. Most pedestrians - especially older people, including some with walking aids - move at not much more than half my speed.

The Transport Statement 3.4.7 asserts that St Sampson's Church of England Primary School lies within 5 minutes' walk of the proposed development site. This is simply wrong; an Olympic athlete may just be able to do it but I cannot cover that journey in less than 12 minutes, whilst a mother with young children – some of whom will be on foot – on the way to school may take at least 20 minutes in each direction, and then only to/from the proposed site entrance, not the residences.

The same paragraph 3.4.7 claims: "the whole of the town centre, High Street and further bus stops accessible within a 10 minute walk." This is also ambitious, although the next sentence: "The northern extent of the town, Cricklade Leisure Centre, the Cricket Club and Rugby pitches are all accessible within a 20-25 minute walk" may be approximately correct. Given that the Cricket Club is only a 3-4 minute walk from the High Street, this puts the High Street at 20-22 minutes' walk from the development site, not 10 minutes as stated earlier in the paragraph.

Figure 3 on Page 9 of the Transport Statement purports to show photographs of viewpoints along Church Walk, being the pedestrian-only path cited as the main route from development site to the Primary School and town centre. In fact, only the Viewpoint 1 photograph depicts Church Walk. Viewpoint 2 shows the B4040 Malmesbury Road.

Cycling Accessibility

Paragraph 3.4.9 describes the National Cycle Network Route 45 as passing through Cricklade town, providing a long distance route between Salisbury and Swindon to the south-east and Cirencester and Gloucester in the north-west. This route is currently closed approximately $\frac{3}{4}$ mile east of Cricklade, where the permissive path has been physically barred for the last 18 months at least. There is no indication when the route will re-open.

Paragraph 3.4.12 of the TS states: "The closest bus stop (named 'Turning Circle') is located on the roundabout joining the B4553, the B4040, and the High Street. The stop can be accessed via Church Walk, with a walking route distance of 540m (approximately seven minutes, or a two-minute cycle) with Church Walk being traffic-free and with footpaths separated from the carriageway provided along the B4040 to the east." This seems to suggest that Church Walk is an acceptable route for cyclists, whereas in fact it is pedestrian-only. Some cyclists do currently use Church Walk but the pathway is narrow and uneven in places. Cyclists cause unnecessary disruption and inconvenience, particularly to elderly residents using walking aids, wheelchair users, parents and grandparents with toddlers, and dog walkers. I submit that the Applicant's proposals should specifically exclude any connection between cycling and Church Walk.

Summary & Conclusions

1. The Planning Application demonstrates a lack of understanding of the areas surrounding the proposed site and their current uses by non-vehicular traffic. The only attempt to mitigate the impact of the development on foot users of The Forty is provision of a pedestrian crossing point to Church Walk. This benefits only residents proceeding to and from the development site and immediately adjacent Hitchings. It leaves unresolved, and in some respects exacerbates, other road safety issues on The Forty and beyond.
2. Issues identified above are based on my detailed knowledge and daily walking in the area over many years. I suggest that this factual 'on-the-ground' experience is more accurate and more reliable than information assembled from generalised databases by the Applicant's team.
3. Only a small number of households in The Forty have been formally notified of the proposed development, in a limited area very close to the development land. The proposals affect the whole length of The Forty to and including the Purton Road junction, yet only six households near the proposed residential site have been contacted. There are no notifications to residents of Carpenters and Ockwells, both of which open onto The Forty very close to the aforesaid junction where road alterations are proposed. I suggest that this omission requires early rectification, with appropriate adjustment of the relevant consultation dates.
4. I have identified several factual errors in the proposals, including high vehicle speeds being overlooked, over-optimistic walking times and apparent inclusion of a main pedestrian-only route in the cycling times.
5. The Design and Access Statement (2.14) refers to the proximity of Chelworth Industrial Estate "providing a wide range of employment opportunities." The Transport Statement (3.4.11) describes the Chelworth site as a "major employment hub." No evidence is offered to support either of these statements. Chelworth Industrial Estate is a relatively small enterprise with only limited scope for employment opportunities. The nearest major employment hubs are Swindon and Cirencester, necessitating use of motor vehicles by the majority of working Cricklade residents.
6. The Applicant acknowledges that the residential development proposals conflict with Core Strategy Policy 2 in terms of the site's location outside the settlement boundary. I respectfully submit that perceived benefits of the proposals do not outweigh this conflict. I challenge the Applicant's claim (Planning Statement 7.9): "that there are no adverse impacts arising from the development that would significantly and demonstrably outweigh the identified benefits." I understand that there are two other planning applications for residential development in Cricklade, both of which fall within the settlement boundary.

Comments submitted by Michael Strong, 17 January 2024.