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Malmesbury Road, Cricklade

Mac Mic Strategic Land Limited

Technical Note – Response to WC Highways
Initial Comments 21.5.26

June 2026





Document Control

Job No.	251409	
Project Name	Malmesbury Road, Cricklade	
Document Title	Technical Note – Response to WC Highways Initial Comments 21.5.26	
Status	Issue 02	
Client	Mac Mic Strategic Land Limited	
	Name	Date
Prepared By	Tom Peters	June 2026
Checked By	Elisabeth Spencer	June 2026
Approved By	Elisabeth Spencer	June 2026

Record of Revisions

Revision	Date	Details	Made By
2	July 2026	Client Comments	THP

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Contents

Document Control.....	i
1 Introduction	1
2 Wiltshire Council Highways Comments	2
3 Summary and Conclusions.....	9

List of Figures and Tables

Table 2.1: Proposed Traffic Flows	2
Figure 2.1 CD123 Exert of Junction Type Guidance	3
Figure 2.2 Key Active Travel Routes.....	7

Appendices

- Appendix A – Wiltshire Highways Comments
- Appendix B – Proposed Access Arrangements



1 Introduction

- 1.1 This Technical Note (TN) has been prepared by Rappor on behalf of Mac Mic Strategic Land Limited to support an application for a residential development of up to 315 dwellings at Land North and South of Stones Lane, and North of Malmesbury Road, Cricklade.
- 1.2 The development description is:
- “Outline planning permission for up to 315 dwellings with associated access and infrastructure including Suitable Alternative Natural Greenspace. All matters are reserved except for access.”*
- 1.3 The planning application was validated by Wiltshire Council under planning reference PL/2026/02134 and was accompanied by a Transport Assessment, and Travel Plan which were prepared by Rappor.
- 1.4 On 21st May 2026, Wiltshire Council (WC) in its role as the Local Highway Authority, provided initial comments as a formal consultation response to the application, a copy of which is included at **Appendix A**. The comments provided by WC have been summarised into the following points.
- a) Access Suitability
 - b) Active Travel Routes To/From the Town Centre
 - c) Proposed Financial Contributions
- 1.5 In addition to the comments provided by WC, Cricklade Town Council (CTC) have also provided a series of comments. Where relevant to the content of this report, these have been reviewed alongside the response to WC and addressed as appropriate throughout the response to WC.
- 1.6 This TN addresses the comments raised by WC and CTC and concludes that, in accordance with the relevant transport tests set out in the NPPF, safe and suitable access can be achieved, that the site is well located with regards to sustainable travel modes, that appropriate active travel access to/from key facilities (including the town centre) are available, and that the impact of the traffic generated by the proposals will not result in an unacceptable impact on highway safety nor a severe residual cumulative impact on the road network.



2 Wiltshire Council Highways Comments

2.1 This chapter responds to the comments made within WC Highways Initial Comments (dated 21 May 2026). The comments focus on two specific issues:

- a) Access Suitability
- b) Active Travel Routes To/From the Town Centre
- c) Proposed Financial Contributions

2.2 These issues have been addressed under separate headings below.

Access Suitability

2.3 The proposed access arrangement is in the form of a simple priority junction with the B4040 Common Hill. As part of the proposals, the existing 30mph speed limit and Cricklade gateway sign will be relocated further west.

2.4 WC comment on the proposed access arrangements, stating that they are satisfied with the junction capacity analysis at the access junction and that it will operate within capacity. However WC request further information to justify how the Transport Assessment has concluded that a simple priority junction is an appropriate form of access, and in particular justification why a Right Turn Lane has not been provided. WC advise that this justification is required before they can make a detailed highway response to the proposals and reach final view on the appropriateness of the proposed access arrangement.

Proposed Access

2.5 For the avoidance of doubt, the access arrangements as proposed comprise a simple priority junction, the arrangements of which are demonstrated within **Appendix B**. This access arrangement is considered acceptable, as it operates within capacity, provides safe and suitable access for all users, and represents a proportionate design response to the site context. This is consistent with national policy and guidance principles, which encourage well-designed places, efficient use of land and streets that respond to their local context. The proposed arrangement avoids overengineering the access, reduces the extent of highway infrastructure required and minimises wider impacts, including ecological impacts on the existing hedgerow.

Traffic Data

2.6 To help inform this assessment the traffic flow data along the B4040 Common Hill / Malmesbury Road, together with the proposed traffic generation associated with the proposed development is set out in **Table 2.1** below.

Carriageway	Two Way Flow (AADT)
Malmesbury Road	3210
Site Access	1586

Table 2.1: Proposed Traffic Flows

Design Requirements: CD123

- 2.7 The Design Manual for Roads and Bridges (DMRB) sets out the design guidance for priority junctions within CD123: Geometric Design of At Grade Priority and Signalised Junctions. Within CD123, Figure 2.3.1 details the approximate level of junction provision based on minor and major road flows only. This figure is reproduced below, with the corresponding flows for the proposed development marked onto it accordingly.
- 2.8 Furthermore, is recognised that CD123 typically sets out guidance for designing of junctions rather than design requirements, and as such should be considered accordingly. Pertinently, Figure 2.3.1 as replicated below sets out the “*approximate*” junction provision and therefore professional judgement should be applied in implementation of such guidance. Nevertheless, an assessment against this guidance is set out below.

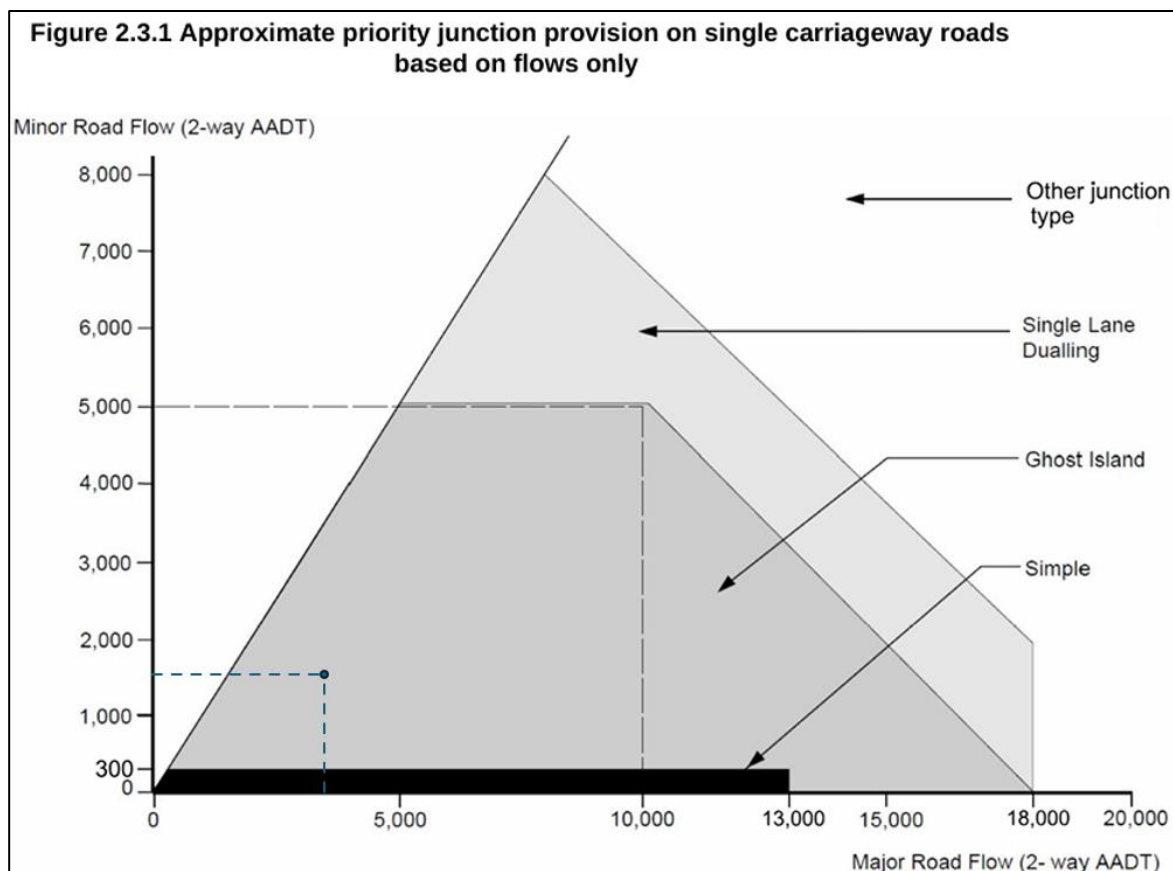


Figure 2.1 CD123 Exert of Junction Type Guidance

- 2.9 As demonstrated in **Figure 2.1**, based on flows alone, a simple priority junction would typically be suitable for major road flows up to around 13,000 two-way AADT with minor road flows of around 300 two-way AADT. This is a very low threshold and would suggest that almost any residential development over c. 60 dwellings would need a right-turn lane. This clearly isn't necessary or appropriate in most cases and not how it's applied in practice. which clearly isn't necessary or appropriate in most cases and isn't how it's applied in practice.
- 2.10 Relevant to the proposed development, **Figure 2.1** demonstrates that, based on the flows identified in **Table 2.1**, it *may* be appropriate to provide a Ghost Island Right Turn Lane to access the site rather than a simple priority junction. However, the flows are only slightly



above those recommending a simple priority junction and this is an initial guide which requires case-by-case consideration.

2.11 It should also be noted that DMRB guidance applies to motorways and trunk roads and is not always an appropriate guide for urban, semi-urban or residential streets. In this instance a more appropriate reference point would be Manual for Streets (MfS) / Manual for Streets 2 (MfS2).

2.12 Specifically regarding right turn lanes, Manual for Streets 2 paragraph 9.4.8 states

“9.4.8 Right turning lanes make it more difficult for pedestrians to cross major roads and lead to higher traffic speeds and authorities should therefore consider carefully all of the effects before deciding to provide them. Removing unnecessary right turn lanes can also be considered, and will bring substantial benefits to non-motorised users.

2.13 Noting the above, MfS/MfS2 are considered more appropriate guidance in the context of the proposed development and its setting within the local highway network. MfS/MfS2 places greater emphasis on balancing vehicle movements with the needs of pedestrians and other users.

2.14 Therefore on this basis, and taking into account the relative low development traffic flows and flows on the main road, a ghost island right turn lane is not considered an essential requirement for the proposed development. Instead, the merits of a ghost island right turn lane, beyond the provision of a simple priority junction, should be considered further to determine whether a ghost island right turn lane would be appropriate or not in this location, for this scale of development.

2.15 The details of this further consideration are set out below.

Right Turn Lane Considered

2.16 A Right Turn Lane was considered as part of the initial optioneering exercise but was discounted relatively early as it wasn't considered necessary or appropriate for the following reasons.

2.17 Firstly, although the majority of vehicles will access the site from the east and therefore seek to turn right into the site, a Ghost Island Right Turn Lane is not required for capacity. The modelling results contained within the submitted Transport Assessment demonstrate that the right-in movement is forecast to operate with a maximum RFC of 0.20. Furthermore, maximum queues are forecast to be less than 1 vehicle on average at any point during the highway peak hours therefore there is a very low likelihood of right-turning vehicles delaying through traffic. There is therefore no capacity reason why a right-turn lane should be provided. In addition, forward visibility at the new junction is good, meaning approaching drivers will be able to clearly see any vehicle waiting to turn right and adjust their speed accordingly.

2.18 Subsequently, providing a right turn lane would provide excess capacity above and beyond that required to ensure the development operates satisfactorily. It is recognised that by providing excessive capacity at a junction can create a principle of car use, and in this case the provision of a right turn lane could have the undesired effect of encouraging people to drive to/from the site for short trips because of the ease of accessing the network.



- 2.19 Secondly, it is recognised that character of the existing network along the B4040, and the wider highway network within Cricklade, does not have any right turn lane junctions. The junctions serving the residential estate to the south, such as Deansfield, are all served by simple priority junctions, without any notable collision record, demonstrating they operate safely without issue. Therefore, a right turn lane would likely be considered excessive and unnecessarily out of character compared to existing junction operation locally.
- 2.20 Further considerations include recorded traffic speeds, which while slightly above the posted limit, do not dictate a high-risk environment requiring a ghost island arrangement, particularly given, as noted in MfS2, right turn lanes can lead to higher speeds. Furthermore, the introduction of the simple priority junction arrangement, together with the extension of the 30mph speed limit and Cricklade gateway sign, will introduce additional side friction, which is expected to have a natural traffic calming effect on existing speeds.
- 2.21 The secondary implications of a right turn lane include widening the carriageway, which would have a potential impact on the hedgerow fronting the site, as well as relocation of utilities and result in a more engineered appearance which would be inconsistent with the rural-edge character of the site.
- 2.22 Following the above review, it was considered that a Ghost Island Right Turn Lane was excessive, unnecessary and inappropriate in this location. Furthermore it is considered a Right Turn Lane would offer little benefit above a simple priority junction and could in fact have the adverse impact of increased traffic speeds and encouraging car travel from the site.
- 2.23 The above conclusions meant that a Right Turn Lane option was not considered further.

Roundabout Option Considered

- 2.24 It is noted that CTC have previously raised the suggestion of a roundabout to act as a traffic calming feature for vehicles approaching Cricklade from the west. This was considered, however given the relatively low level of traffic along the B4040 in the location, a roundabout was considered excessive in terms of capacity, and it is considered more appropriate forms of traffic calming could be delivered noting the mean speeds are only slightly in excess of the speed limit, and that speed limit extension and urbanisation through additional active frontage and functions will have a calming effect on speeds themselves.
- 2.25 On this basis a roundabout was not considered any further.

Summary

- 2.26 The assessment confirms that a simple priority junction is the most appropriate form of junction and this conclusion remains unchanged, with no evidence to suggest otherwise.
- 2.27 It is acknowledged that a Stage 1 Road Safety Audit brief was submitted for agreement within the TA. This Stage 1 RSA can be progressed now if WC wish to see further evidence that the proposed access arrangements are safe and suitable.
- 2.28 Meanwhile the applicant remains open to discussions surrounding the contribution towards gateway traffic-calming features for vehicles approaching Cricklade from the west.
- 2.29 On this basis the proposed access arrangements are considered safe and suitable, therefore complying with NPPF Paragraph 115.



Active Travel Routes To/From the Town Centre

- 2.30 The second issue raised by WC, is a perceived lack of connectivity between the site and the town centre. WC acknowledge that the site is sustainable given the availability of a range of facilities within walking distance, which includes Cricklade town centre. However, WC assert there is a lack of “*desirable link*” between the site and Cricklade town centre.
- 2.31 This view is disputed. Future residents will have two principal route choices available, which offer attractive, user friendly, desirable routes to/from the town centre. These routes are shown on **Figure 2.2**, and discussed below.

Route Analysis – via Malmesbury Road

- 2.32 The first route, routes along Malmesbury Road. As part of the proposals (or in combination with the adjacent Bloor application) a new 2.0m footway is to be delivered, this is delineated in purple on **Figure 2.2**. This will ensure that residents exiting the site from the southern frontage onto Malmesbury Road will be able to access a lit, 2.0m footway which routes east towards Cricklade.
- 2.33 East of Horsey Down this route continues along Common Hill along the existing infrastructure, shown in green on **Figure 2.2**. At the junction with Common Hill and West Mill Lane, pedestrians will route along West Mill Lane before continuing along Bath Road to route east towards the town centre (shown in blue). This route is already well utilised by existing residents and delivers continuous street-lit footway provision and is supported by uncontrolled pedestrian crossing points.
- 2.34 Bath Road itself is fairly lightly trafficked, with a no-through route at the end acting as a permeable filter for pedestrian and cyclists. It too has a c. 1.5 m footway present along the northern carriageway edge which provides access to the local primary school, St Samson’s CE Primary School. The footway, which is meets MfS guidance, connects into the existing provision in the wider Cricklade area and provides direct access to the primary school and town centre.
- 2.35 The route between the site and Cricklade Town Centre, via West Mill Lane and Bath Road, features continuous footways, with accompanying crossing locations, comprising dropped kerbs and tactile paving, at appropriate locations. It is noted that the CTC response raises concerns with crossing facilities over West Mill Lane, and as such the locations of these key crossing points are also shown on **Figure 2.2**. As such this route is attractive, follows the key desire line, is not unduly convoluted, is lightly trafficked, and has all necessary infrastructure to support pedestrian movement to/from the development, including to/from the primary school.

Proposed Improvement

- 2.36 It is noted that this route is not currently clearly signed as a key route to the town centre, likely on the basis of existing residents being well acquainted with the route already. However, given the proposed growth on the western edge of the town, it is considered the development could provide a proportionate contribution towards providing wayfinding signage towards the town centre. This could take the form of standard wayfinding signage, such as posts with appropriate wording or symbols, or potentially painted routes with activity trials incorporated along the footways. This would offer two key benefits: first, helping to promote the walking route and second, given its function as a route to school, supporting

greater interaction by children, encouraging walking from an early age, as well as helping to identify the appropriate crossing locations along the route.

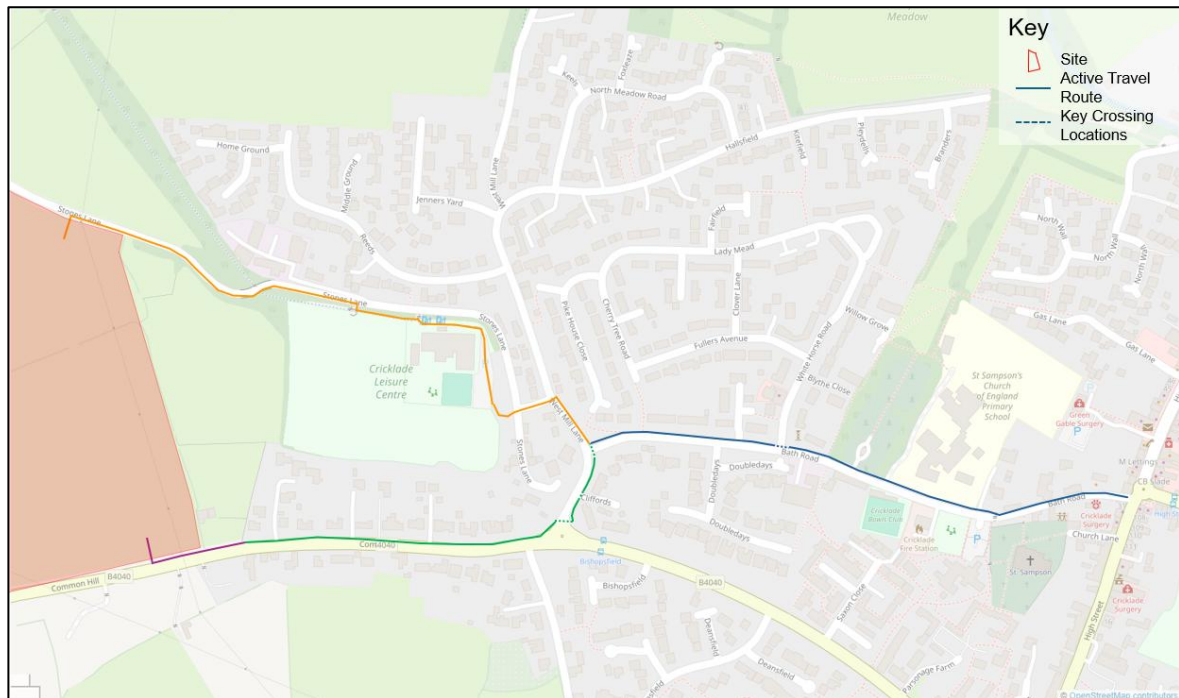


Figure 2.2 Key Active Travel Routes

Route Analysis – Via Stones Lane

- 2.37 The second key route from the site towards town is along Stones Lane, shown in orange on **Figure 2.2**. It is noted that this utilises Stones Lane which has no dedicated infrastructure however it is a low speed, low-traffic volume environment, which characteristics align with the “quiet lane” principles endorsed by LTN 1/20 and MfS. It is therefore considered appropriate for use as an active travel route.
- 2.38 Furthermore, in the event that the neighbouring site is able to secure a connection onto the Cricklade Railway route, then the site is well positioned to provide a connection through the Bloor site onto the disused railway and provide an additional, alternative route to Stones Lane. Whilst this additional route is dependent on third-party land, the applicant has demonstrated a commitment to safeguard a potential connection within the site layout as appropriate.

Summary

- 2.39 In light of the combined new footway along Malmesbury Road, which will connect with the existing continuous footways to the town centre, the benefit of an alternative ‘quiet lane’ route along Stones Lane, and the potential wayfinding walking route improvements, it is considered the site offers a safe, attractive and policy compliant active travel environment to facilitate and encourage sustainable travel to/from key facilities towards and within Cricklade town centre.



Proposed Financial Contributions

- 2.40 Aside from the issues discussed above, Wiltshire Council Highways raise the suggestion of various financial contributions which they consider the proposed development should be incumbent to.
- 2.41 The exact details of these contributions should be subject to further review and scrutiny noting that these have not been raised prior to now and no evidence has been submitted in support.
- 2.42 Of particular interest to the client is the Passenger Transport Team's request for £855,000 to fund the extension of the 52 service through the site. The response provided by WC suggests that this service is subject to a current funding which concludes March 2028, and therefore appears to be requesting the proposed development fund the service for a further 5 years once this existing funding concludes.
- 2.43 The appropriateness of this is questioned. The reasoning appears to point to WC's view that the proposals are reliant on delivering a loop within the site, and points to paragraph 3.31 of the TP to justify this assertion. For clarity paragraph 3.31 of the TP states:

"3.31 In addition to the above, the site has been designed to ensure the site is capable of accommodating a future bus loop, subject to future discussions with the bus operator and Wiltshire Council. This would enable a bus to enter the site and route through an internal loop arrangement, before continuing the remainder of its current service. Further details of any future bus provision will be determined post-application and as part of any future reserved matters application, at which point potential bus stop locations can be identified as appropriate."

- 2.44 This clearly demonstrates that the proposals are enabling a potential future extension through the site should the operators view this as favourable. However, the scheme is not reliant on any internal bus loop. Therefore, to request funding contributions which effectively fully fund the existing service for 5 years is considered excessive without substantial justification.
- 2.45 Planning obligations must satisfy the three tests set out in paragraph 58 of the NPPF as follows

"a) necessary to make the development acceptable in planning terms;

b) directly related to the development; and

c) fairly and reasonably related in scale and kind to the development."

- 2.46 The client remains willing to consider any robust supporting evidence. However, in its absence, there is no basis to demonstrate that the requested contribution meets the NPPF tests and it is therefore not considered justified or appropriate.



3 Summary and Conclusions

- 3.1 Rappor have been instructed by Mac Mic Strategic Land Limited to prepare a TN in support of a planning application for a residential development of up to 315 dwellings at Land North and South of Stones Lane, and North of Malmesbury Road, Cricklade.
- 3.2 This TN responds to comments provided by WC on the original submission material and seeks to clarify any outstanding queries.
- 3.3 This TN has clarified / demonstrated the following:
- a) The proposed site access junction arrangement in the form of a simple priority junction is suitable and appropriate for the location, highway conditions, and proposed development;
 - b) A right turn lane would be excessive, over-engineered, whilst offering no benefit above the access arrangements as proposed.
 - c) Through the provision of a new footway connection on Malmesbury Road and a connection to Stones Lane, the proposals secure continuous and attractive active travel routes between the site and Cricklade Town Centre, thereby encouraging walking and cycling as realistic and attractive alternatives to the car.
 - d) The development is not dependent on any extension of the bus service through the site and as such the proposed public transport contribution lacks clear justification and should be subject to review in the absence of robust supporting evidence.
- 3.4 It is concluded therefore, that the site provides safe and suitable access for all users, in accordance with NPPF Paragraph 115, and does not result in an unacceptable impact on highway safety, or a severe residual cumulative impact on the road network, with reference to NPPF Paragraph 116. Therefore, there is no highways reason to refuse this application.



Appendix A – Wiltshire Highways Comments

Highways – 21.5.26

The proposal seeks outline permission with all matters reserved excluding access. The location of the proposal site sits west of Cricklade which is classified as a local service centre within the There are two accesses in the planning documents, the main vehicular and pedestrian access from the B4040, Common Hill and an Emergency access that is to be restricted with a removable bollard, to Stones Lane to the north of the main access.

The main access to the development will be from the B4040, Common Hill just outside the current built limit of Cricklade and will require the moving of the current Cricklade gateway sign and speed limit. This will require a Traffic Regulation Order to be completed and agreed this will be detailed in a condition with the caveat that the TRO process is subject to public scrutiny and the final decision will rest with the cabinet member for Highways.

The TRO required to alter the speed limit on the approach to Cricklade will have the costs for advertising and implementation met by the developer.

A speed survey determining the average and 85th percentile speeds have demonstrated that the access has adequate visibility at the junction with the B4040 and adequate forward visibility on the approach to the development. An independent road safety audit (RSA1/2) will provide further clarification and any recommendations for further highway safety mitigation measures that can be designed into the reserved matters application.

Plans indicating a footway connection from the development access east toward the established footway at Horsey Down will be required and should be provided via a S278 agreement with the LHA, along with providing a culvert over the drainage ditch that forms the highway boundary. It is noted that the plans include a footway connection to the proposed Bloor development site to the west of Horsey Down (2021/10404). As the proposal 2021/10404 is yet to be determined there will be a requirement for this development to provide the footway connection should 2021/10404 not come forward for development.

Connecting the development to services within Cricklade to provide for suitable walking and wheeling transport is possible given shops and medical services are located approximately 1km and a 20 minute walk and the Leisure Centre and Primary School are within 500m and 800 m respectively and an walking or cycling route via the low traffic Stone Lane and Bath Road can be achieved via the proposed emergency bollard protected access onto Stone Lane.

While there is no upper limit to distances deemed acceptable services to be seen as walkable, MfS generally considers 10 minutes or approx. 800 m as acceptable walking distance. As shops on the High Street in Cricklade are within a 15-20 minute walk of the proposed development then the proposal is sustainable with enhancements to walking and wheeling infrastructure.

There is scope within any granting of permission for increasing permeability and enhancing connections between new and existing communities. To provide for sustainable transport objectives of lowering the number of journeys undertaken by motorised vehicles walking and wheeling alternatives, particularly for shorter journeys. To make the site acceptable in sustainable transport terms a desirable link to the centre of Cricklade must be produced for future occupiers of the proposed site. A desire to connect the development to the north with the national Sustran route 45 to enable connectivity for pedestrian and cycle use and provide a route to the High Street via low traffic routes is commendable but to be considered a sustainable option a coherent direct, safe and comfortable route must be demonstrated.

A connection is available to the northeast of the site via Stone Lane and should link to the extension of the Sustrans 45 route from where the path passes under the Stone Lane bridge to the Leisure Centre to form an appropriate off road access arrangement. This would involve third party agreement

as the permissive route is over land that is under the control of Cotswold Lakes Trust and Cricklade Town Council.

Although not part of the consideration for this outline application with all other matters than access reserved, the path is recommended to be upgraded and widened to form a shared use path, the LHA will ask for a contribution through the S106 process and condition that there be an agreement with all parties and an agreed contribution to arrange the construction of the path. The LHA will seek an amount of £80,000 through S106 contributions to upgrade a link along the National Cycle Network Route 45 that will provide an active travel route from the site into the town and a connection to wider active travel opportunities.

Should the neighbouring site covered under the planning application 2021/10404 be granted permission then the obligation can be split if both developments are to gain pedestrian access via this route.

Future bus provision by an extension of the 53 service to a loop within the development as indicated within the travel plan by paragraph 3.31 The applicant raises the intent of consulting with Stagecoach bus company but will need to be negotiated with the bus team within Wiltshire Council. The Passenger Transport Team were consulted as part of the process for assessing this application and indicated that a sum of £855,000 for this service will be required. The total cost of this enhanced service is currently £171,000 per annum which is partially funded from funds obtained from Central Government and currently only available until March 2028. Therefore, the funding request will be provided via a S106 contribution with the first payment provided by March 1st, 2028.

A pipeline is situated on Common Hill close to the proposed access to the development, this should be thoroughly interrogated and included within any future Reserved Matters application.

Given the access design must be agreed at the outline stage I require additional certainty that the design parameters proposed best fit the design purpose and safety requirements prior to signing off this arrangement.

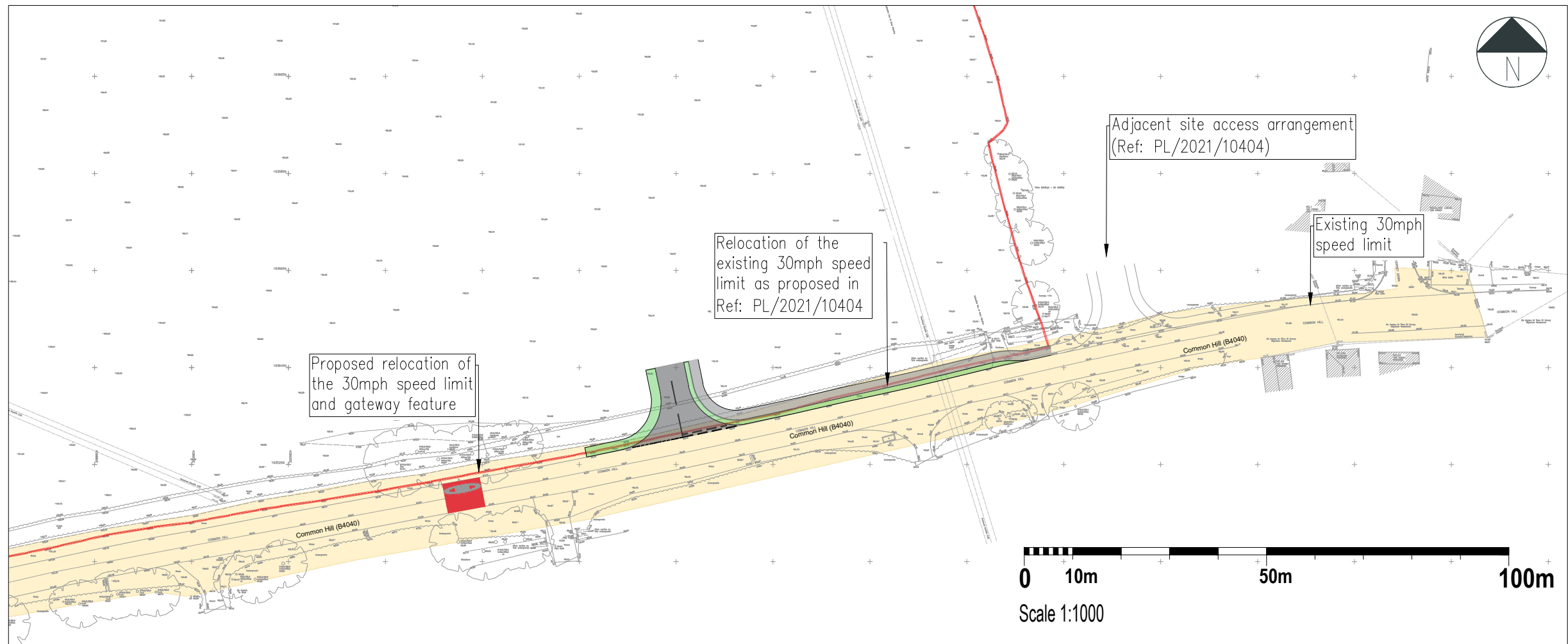
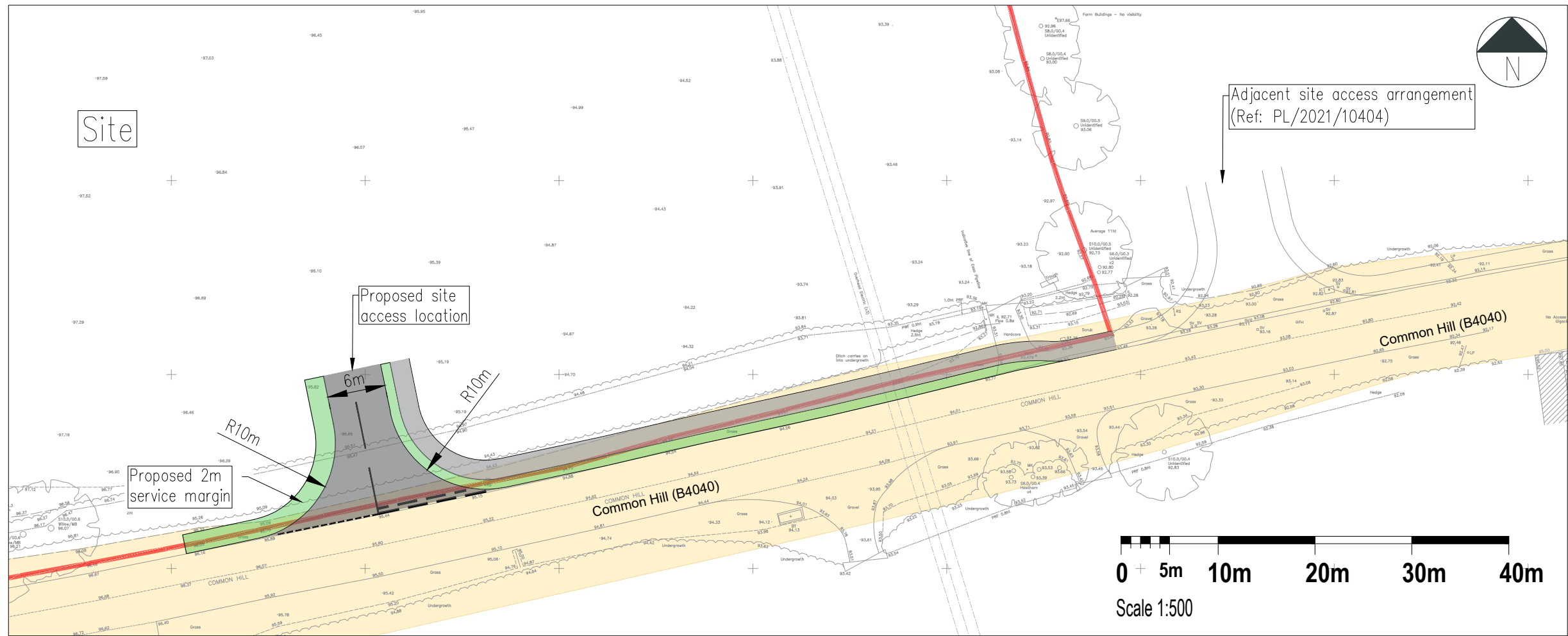
I note the Transport Assessment provided concludes that a simple priority junction is suitable and I am satisfied that the trip analyses and modelling has been applied in an appropriate manner indicating small values in wait time while accessing the junction on the B4040 Common Hill and the proposed access to the development. However, no justification has been offered within the TA or the RSA referenced against the inclusion of a right turn lane. While DMRB is referenced in general terms, the proposals have not been scrutinised against guidance contained within CD123 revision 2.

Therefore, to make a detailed highway response to the proposals I wish to be provided with analysis of CD123 and the provision of a RHT lane before accepting the final layout of the access arrangements. This can be in the form of an addendum to the TA.

I invite further detail on this proposal prior to a complete highways response.



Appendix B – Proposed Access Arrangements



Notes:

1. Do not scale from this drawing. All dimensions are in metres, unless stated otherwise.
2. This topographical drawing was received from Precise Land Surveys, drawing number T_PLS933 & dated July 2023.
3. Highway boundary information has been provided by Wiltshire Council (06/09/2022) and has been overlaid by Rappor onto the Topographical Survey on a best fit basis.
4. Drawing to be read in conjunction with all other drawings. Any discrepancies are to be reported to the engineer 5 working days in advance of undertaking any work.
5. The layout is subject to detailed design, capacity testing, ground investigations & earth modelling, road safety audit, utilities & services and confirmation of land ownership.
6. Use of the drawing does not absolve the client from their responsibilities in regards to health & safety and CDM regulations.

Key:

- Indicative Site Boundary
- Adopted Highway Boundary
- Proposed Verge
- Proposed Carriageway
- Proposed Footway

P03	08.04.26	Scale bars added	TP	ES	ES
P02	18.02.26	Minor revisions	TP	ES	ES
P01	06.01.26	First Issue	SB	TP	ES
Rev	Date	Details	By	Chkd	Appd

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CLIENT: Mac Mic Group

PROJECT: Land at Common Hill, Cricklade, Wiltshire

TITLE: Proposed Access Arrangements

STATUS: For Information	Scale @ A3 As Stated
DRAWING NO: 251409-RAP-XX-XX-DR-TP-3200	REVISION: P03

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