

Lidl Store: APPLICATION REFERENCE

PL/2022/05273

Written Submission to Wiltshire Council in relation to planning decision scheduled for Weds 13th September 2023.

Royal Wootton Bassett Environment Trust, Active Travel Group

Propose that that the following planning conditions and obligations are imposed in regard to this development.

- In accordance with LTN 2/08 at paragraph 9.6.1 the applicant shall move the location of the proposed raised table crossing from its proposed location well within the site boundaries, to directly at the entrance of the side access road to the B4042. It shall provide a flat-topped road hump placed at the entrance to the side access road, replacing the existing section of removed shared use path with a replacement 3m wide shared cycleway/footway crossing with contrasting coloured surfacing, and 2m wide granite or suitable concrete sett rumble strips on each side of the crossing to maintain pedestrian and cycle movements on the existing shared use path to the north of the B4042 and ensure they remain convenient.
- The applicant shall design and construct a linking section of 3m wide path according to LTN1/20 and Wiltshire Councils Design Guidance between the South side of the Toucan Crossing and the end of Saffron Close, a quiet street that provides safer access to the majority of Royal Wootton Bassett for non-car users.

The rationale for this is described below:

1. Necessary
 - Inadequate access to Lidl Site for bicycles, e-bikes, load carrying bicycles, wheelchair users, mobility scooter users, young parents with children and other wheelers.
 - Current proposals do not meet Wiltshire Councils Climate Strategy Delivery Plan for Wiltshire 2022-2024, Sept 2022, Transport Delivery Theme. This acknowledged the change required: A 25% reduction in the average miles travelled per person per day in private cars and taxis • A 67% increase in active travel mileage from 2020 levels, so that 5% of mileage share is active travel by 2030. These are supported by Actions T2.1 and T2.2. in relation to sustainable travel.
 - Transport is the largest single source of emissions in Wiltshire at 45% and is an area which WC has considerable control over.
 - The Site access arrangements do not follow The Town Council's Climate and Environment Policy <https://www.royalwoottonbassett.gov.uk/mdocs-posts/climate-and-environmental-policy-2023/> and implementing action plan.
 - The site access arrangements do not meet National Guidance including LTN 2/08 and 1/12, as referred to in Wiltshire Council's Cycling Strategy nor other best practice issued by the CIHT and Manual for Streets.

- The site access arrangements do not meet WC core policies 60, 61 and 62. prioritise active travel modes as alternatives to car travel.
- The site access arrangements do not meet LTN 2/08 at paragraph 9.6.1 advocates the use of raised tables in these kind of circumstances: Raised entry treatments, where a flat-topped road hump is placed at the entrance to a side road, can make pedestrian crossing movements more convenient. Cyclists also benefit, because motor vehicles entering or leaving the side road do so at reduced speed.

2. Relevant to planning

The current plans pay insufficient attention to and provide insufficient information on safe access to the site by Active Travel routes and means as set out in National Planning Policy Framework (NPPF), which at paragraph 110 states

'...Within this context, applications for development should:

- a) give priority: firstly, to pedestrian and cycle movements, both within the scheme and with neighbouring areas, and secondly, so far as is possible, to facilitate access to public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;'

The inadequate access arrangements do not reflect or meet the requirements of:

- UK gov guidance note cycle-infrastructure-design-ltn-1-20.
- <https://www.gov.uk/government/publications/the-second-cycling-and-walking-investment-strategy>
- <https://www.gov.uk/government/publications/cycling-and-walking-plan-for-england>
- The Highway Code 3 new rules about the new 'hierarchy of road users'

3. Relevant to the development to be permitted

- The application misses a clear opportunity to increase customer numbers and revenue through improved non-vehicular access.
- It does not enable safe access for disabled people or for people with impaired mobility, or for buggies with young parents to the site from the direction of the town to the South of the toucan crossing.
- The Travel Plan July 2022, targets in section 4 do not reflect the WC climate strategy and aims to decarbonise by 2030.
- The Table 4.2 indicative modal share targets may not have been updated since the adoption of the Climate Strategy and in particular the increases in public transport, reductions in car use and increase in cycling and walking do not appear to align to the objectives of the Climate Strategy.

- The measures proposed in Table 6.1 Proposed Initiatives and Measures do not reflect the needs of the development. Specifically:
 - They do not include any specific provision to improve cycle routes to access the site or to link with existing infrastructure.
 - The reducing car trips section is undermined by the amended access design drawings (Proposed Lidl Site Access Arrangement on B4042) which make car travel to site by far the easiest and makes cycle travel past the site more difficult.
- The Proposed Lidl Site Access Arrangement on the B4042 reduces amenity and the effectiveness of the existing shared path to the north of the B4042
- The Proposed Lidl Site Access Arrangement on the B4042 does not enable access to the Toucan Crossing from the South side for non-pedestrian users such as cyclists and other wheelers.
- It ignores Lidl's Climate change and broader sustainability policies <https://corporate.lidl.co.uk/sustainability/climate-change>
- It undermines Wiltshire Council's initial investment in the Toucan crossing as the Toucan is designed for cyclists and pedestrians, but no access from the South side is proposed.
- There has been inadequate consultation: The Interim Statement of Community Involvement June 2022, and Consultee List June 2022 do not adequately reflect community interest. This is evidenced by:
 - publicly accessible information on the proposed 'Academy Way'a path which proposes a link between the end of Saffron close (a quiet street) and the Toucan Crossing on the B4042 to access the Lidl development. Active travel routes including this important short linking section are available via the towns Environment Group (now Trust) website <https://www.ecorwb.org/active-travel>
 - Publicly available presentations to Town's Full Council and Planning Committee including 'Improved cycling provision for Royal Wootton Bassett – survey results presentation, December 2020' summarise the results of local survey with 287 respondents and an additional survey of Academy Students, which strongly support improved provision of safe cycle infrastructure in the Town available from <https://www.royalwoottonbassett.gov.uk/minutes-and-agendas/> and in the document 'Results from Royal Wootton Bassett Academy Cycling survey Oct 2020.docx' available on request. Additional minutes of Active Travel proposals discussed at Planning Committee Cycle Active Travel Group planning committee slides 31st March 22.pdf available from same source.

4. Enforceable

Under [Section 106](#) obligations (England & Wales)

5. Precise; and

- In accordance with LTN 2/08 at paragraph 9.6.1 the applicant shall move the location of the proposed raised table crossing from its proposed location well within the site boundaries, to directly at the entrance of the side access road to the B4042. It shall provide a flat-topped

road hump placed at the entrance to the side access road, replacing the existing section of removed shared use path with a replacement 3m wide shared cycleway/footway crossing with contrasting coloured surfacing, and 2m wide granite or suitable concrete sett rumble

- strips on each side of the crossing to maintain pedestrian and cycle movements on the existing shared use path to the north of the B4042 and ensure they remain convenient.
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6. Reasonable in all other respects.

Due to the proposed significant investment to change the B4042 roadway under the proposed Access arrangements including, the widening of the road to accommodate the Ghost island junction with 3m wide right turn lane and through lanes, the costs on the developer of imposing these planning conditions will be minimal.

The improved access for the active travel pathway will result in increased footfall negating any additional cost over the proposed life time of the store.