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HIGHWAYS, TRANSPORT AND WASTE SERVICE

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LIMPLEY STOKE, WOODS HILL
EXPERIMENTAL PROHIBITION OF DRIVING ORDER

Purpose of Report

1. To:
 - (i) Consider objections, comments and suggestions received in response to the Experimental Prohibition of Driving Order implemented in Woods Hill, Limpley Stoke.
 - (ii) Recommend that the said Prohibition of Driving Order, be made permanent.

Relevance to the Council's Business Plan

2. The proposal to continue the Prohibition of Driving Order indefinitely helps to meet key priorities of the Business Plan; the local parish council and community collaborated with Wiltshire Councillors and Council officers on the proposals. *"We want people in Wiltshire to be encouraged to take responsibility for their well-being, build positive relationships and to get involved, influence and take action on what is best for their own communities - we want residents to succeed to the best of their abilities and feel safe where they live and work"*.

Background

3. For several years Limpley Stoke Parish Council had expressed to Wiltshire Council its concern about safety issues at the junction of Woods Hill with the A36 (trunk road).
4. The safety issues concerned:
 - (i) Visibility from the side road (Woods Hill).
 - (ii) The inadequacy of the junction in coping with vehicle movements.
 - (iii) The severity of the gradient on Woods Hill compromising propitious vehicle manoeuvring.
 - (iv) The character of Woods Hill, in respect of road width, alignment and forward visibility, being inappropriate for some classes of vehicles, especially when used as a short cut to avoid delays at the Viaduct signals.
 - (v) The absence of footways, rendering pedestrians at particular risk.

5. The Parish Council investigated options to address its concerns and chose to pursue the introduction of an Experimental Traffic Regulation Order (ETRO), prohibiting all motor vehicles from using the junction of Woods Hill with the A36, for a maximum period of 18 months.
6. Wiltshire Council endorsed this proposal as the most effective method of assessing any resulting impact on the contiguous local road network. It would also give the public the opportunity to comment during the first six months of operation.
7. Preliminary consultation was carried out between the Parish Council and residents. An online Parish Council meeting was joined by 22 residents, of whom 17 expressed support for an ETRO to take the junction out of use, temporarily. The Parish Council subsequently received representations in support of, and objecting to, the introduction of an ETRO.
8. At the Parish Council meeting in December 2020 it was confirmed that the Woods Hill ETRO would be implemented. An undertaking was also made to keep residents fully informed as to where to send their comments.
9. On 20 December 2020, the Parish Council issued an email notification confirming its intention to implement the Prohibition of Driving ETRO on Woods Hill, adjacent to its junction with the A36. This confirmation was also hand delivered to every household in the village and displayed on local notice boards.

Detail

10. The ETRO prohibiting motor vehicles from entering and leaving Woods Hill at its junction with the A36 (trunk road) was brought into operation on 15 March 2021, for a period not exceeding 18 months. A plan of the scheme is included at **Appendix 1**.
11. During the six-month period commencing at the introduction of the ETRO, 49 specific comments were made by 71 respondents. Of these respondents, 25 indicated their objection to the scheme, 34 indicated their support and 12 provided general observations or queries with no preference indicated. A schedule of comments, together with officer responses, is included at **Appendix 2**. A list of respondents is provided at **Appendix 3**.

Main Considerations for the Council

12. The public representations need to be assessed and taken into account when forming a decision as to the future of the Prohibition of Driving imposed by the ETRO.
13. Analysis of the responses suggests that objections to the ETRO are outweighed by support. Detailed scrutiny reveals that the comments may be broadly divided between those with an objective rationale and those based on a more subjective reaction to the ETRO.
14. The prime objective in introducing the ETRO was to optimize safety for all classes of road user. Concern had been raised over poor visibility at the Woods Hill/A36 junction, lack of manoeuvring space at the junction, severity of gradient, the physical character of Woods Hill in respect of traffic volume and vehicle size and most importantly: pedestrian safety for the entire length of Woods Hill.

15. In terms of collision history, there have been four personal injury collisions recorded at the junction of Woods Hill in the six years preceding this report, all of which occurred because of turning movements. These collisions are classified as 'slight'.
16. It has been argued by some objectors that the scheme would result in an increased volume of traffic using Church Lane, Crowe Lane, Crowe Hill and Lower Stoke as an alternative route. Limpley Stoke Parish Council had been monitoring traffic volumes, by means of electronic data gathering, since October 2020, the output of which was included in its report: '**Report on Findings, Woods Hill Experimental Traffic Order (Ref: LJB/TRO/LSTPexp)**'. The following conclusions were drawn:
17. **Route A – From B3108 via Lower Stoke and Crowe Hill**
 - (i) Through traffic reaching Crowe Lane increased at the time of the ETRO introduction but thereafter remained near constant with a tendency for peak traffic to increase in June 2021.
 - (ii) After introduction of the ETRO, traffic entering Lower Stoke from the B3108 remained near constant until the re-opening, in mid-May 2021, of Limpley Stoke Hotel. Since then, the traffic volume has risen but this has not been replicated in Crowe Hill, suggesting that the increase can be ascribed to traffic associated with the hotel.
 - (iii) Immediately following the introduction of the ETRO there was an implied increase of traffic along Crowe Hill of about 15 vehicles per hour (vph) at peak hours and 8 vph off-peak.
18. **Route B – From A36 into Church Lane, then Crowe Hill to B3108**
 - (i) Peak traffic on Crowe Hill in the direction of Bath/Winsley increased slightly from the introduction of the ETRO. This trend was not repeated in Church Lane, where a marked drop in peak hour traffic was observed during the school holidays.
 - (ii) There is no clear evidence of a change during peak hours on Route B after the introduction of the ETRO.
 - (iii) Off-peak traffic increased slightly after the ETRO was introduced but there is no clear evidence of a change occurring during off-peak hours that can be attributed to the ETRO.

Covid Pandemic

19. Inevitably, traffic data will have been influenced by the introduction of lockdown measures. The data survey for Church Lane made the following observations:
 - (i) At the introduction of the Woods Hill ETRO, volumes had dropped by about 30% compared to 2019.
 - (ii) Following introduction of the ETRO, east bound volumes were unchanged but west bound had increased by about 8%. There was no apparent difference between 5- and 7-day figures.

Interpretation and Implications

20. While some modest increases in traffic volumes had been recorded there was no evidence to suggest any significant trend in that direction.
21. Whereas the Lower Stoke, Crowe Hill, Crowe Lane, Church Lane route is provided with a formal pedestrian footway along much of its length, Woods Hill has none, other than an on-carriageway corridor for pedestrians. The on-carriageway facility is a technique used where a road has insufficient width to support a formal pedestrian footway; the line defining the edge of the corridor is merely advisory to allow for wider vehicles to use the route legitimately. Thus: pedestrians remain vulnerable while under the impression that they are safer due to the marked corridor.
22. In its report, the Parish Council observes (regarding the Lower Stoke/Crowe Hill route) that, due to parked vehicles and the narrowness of the road, traffic may proceed only in single file, causing a certain amount of congestion that automatically regulates its speed to a very low level. Notwithstanding a certain amount of annoyance to motorists and inconvenience to residents, it is argued that this is preferable to vehicles using the narrow and steeply graded Woods Hill, especially having regard to the vulnerability of pedestrians on that route. Any reduction in speed in Lower Stoke/Crowe Hill will inevitably enhance overall safety.
23. The respective characters of the Lower Stoke/Crowe Hill route and Woods Hill are notably different. The former is reasonably well aligned with good forward visibility and pedestrian footway for much of its length, while the latter is poorly aligned, steeply graded, narrow, and lacking formal footways. The section of Church Lane between Crowe Lane and Middle Stoke is less well aligned than Lower Stoke/Crowe Hill and is provided with a continuous footpath. The final section of Church Lane between Middle Stoke and the A36, while not straight, is reasonably aligned although lacking a formal footway. Limited opportunities exist for vehicles to pass one another and, in view of recent housing development since the last speed limit review, the Parish Council would like this section to be restricted to the same 20mph speed limit as the rest of the village.
24. Based on the criteria of footway provision and overall road character, the case for traffic using the Lower Stoke/Crowe Hill/Crowe Lane/Church Lane route as an alternative to Woods Hill is reasonably made.
25. The speed limit issue in Church Lane is noted for future reference.

Stakeholder responses

26. National Highways was included as a statutory consultee as the A36 forms part of its network. National Highways has not raised concerns regarding this prohibition.
27. Limpley Stoke Parish Council has provided the following formal response as part of the consultation:

Limpley Stoke Parish Council initiated the application for an ETRO based on fears of serious injury or death to users of Woods Hill and the A36. That concern remains. Whilst the Parish Council resolved to take a neutral stance over the future status of Woods Hill, there have been no resultant significant issues since the ETRO was introduced which would lead the Parish Council to object to a permanent closure, should that be the decision reached by Wiltshire Council.
28. The elected Wiltshire Councillor for the Winsley and Westood division, Cllr Johnny Kidney, provided the following formal response as part of the consultation:

The experimental closure of Woods Hill was pursued by Limpley Stoke Parish Council in response to the acute dangers caused by rat-running traffic using this steep, single-track, residential lane as a short cut between the A36 and the B3108 (avoiding the signalised junction on the A36 at Dundas Viaduct). The situation had got progressively worse over recent years, with completely unsuitable vehicles, including tourist coaches, caravans, delivery lorries etc attempting to use the route. On many occasions vehicles attempting to go down the hill would meet a vehicle coming up, necessitating a perilously dangerous reverse manoeuvre back onto the busy A36 trunk road at a location with poor visibility. There were numerous collisions and fears had grown that serious injury or loss of life had become inevitable without action. The ETRO was initiated by the Parish Council in response to these fears.

Limpley Stoke occupies a quite unique position, with the A36 cutting through the village just before its junction with the B3108 which takes traffic on to Bradford-on-Avon. The village lanes are completely unsuited to heavy traffic but are all too often used as a short cut to “cut the corner” and avoid the traffic lights at the junction. I have been working with local MPs to press National Highways to resolve the issues with the signalised junction at the A36/B3108 that causes traffic to seek to divert through the lanes of Limpley Stoke, particularly at peak hours. To date National Highways have yet to address these issues. Alongside the trial closure of Woods Hill to stop the dangerous rat-running on that lane, it will be essential to ensure that the traffic that previously used that route as a short cut now stays on the A36/B3108 main route rather than diverting through other village lanes such as Church Lane/Crowe Hill, and it will be important for Wiltshire Highways to continue to work with Limpley Stoke Parish Council, National Highways and myself to achieve a solution to all rat-running through the village lanes to ensure the safety of residents.

Conclusion

29. The imposition of the Experimental Prohibition of Driving Order at the junction of Woods Hill with the A36 has successfully addressed the concerns listed in paragraph 4 of this report. The ETRO has led to some displacement of traffic; it is acknowledged that traffic volume along the Lower Stoke/Crowe Hill/Crowe Lane/Church Lane route has increased at certain times, but not by a significant amount. However, it is also recognised in mitigation that instances of congestion, while inconvenient, serve to regulate the speed of traffic with obvious benefits to overall highway safety. It is therefore considered that the permanent elimination of through traffic from Woods Hill is achievable through a reasonable and acceptable amount of inconvenience to the other parts of the community.

Safeguarding Considerations

30. The proposals present no risk to the Council.

Public Health Implications

31. The removal of through traffic from Woods Hill will undoubtedly enhance public safety and amenity.

Corporate Procurement Implications

32. There are none in this scheme.

Environmental and Climate Change Considerations

33. The traffic signing required for enforcement of a permanent Prohibition of Driving Order would be modest, with negligible visual impact on the immediate environment. The illumination of the regulatory signing would, if practicable, be achieved by means of renewable energy.

Equalities Impact of the Proposal

34. There are none in this scheme.

Risk Assessment

35. The proposals present no risk to the Council.

Financial Implications

36. Funding has been set aside by the Parish Council to contribute to this scheme should it be required. Additional funding may be sought from Bradford on Avon Community Area Transport Group should it be necessary.

Legal Implications

37. The indefinite continuation of the Prohibition of Driving will require a permanent Traffic Regulation Order to be made. The process is governed by the Road Traffic Regulation Act 1984 and Associated Procedural Regulations. Failure to adhere to the statutory processes could result in the restrictions being successfully challenged in the High Court.

Options Considered

38. To:
- (i) Make a permanent Traffic Order enabling the Experimental Prohibition of Driving Order to be made permanent.
 - (ii) To advertise an amended Experimental Traffic Order.
 - (iii) To abandon the Experimental Prohibition of Driving Order.

Reason for Proposals

39. After consideration of public representations and officers' comments, and having assessed the benefits against disadvantages, it is considered appropriate to make a permanent Traffic Order enabling the Experimental Prohibition of Driving Order to be made permanent.

Proposals

40. That:
- (i) A permanent Traffic Order be advertised, enabling the Experimental Prohibition of Driving Order to be made permanent.
 - (ii) The objectors be informed accordingly.

The following unpublished documents have been relied on in the preparation of this Report:

Email / Letters of representation

Report submitted by Limpley Stoke Parish Council: **'Report on Findings, Woods Hill Experimental Traffic Order (Ref: LJB/TRO/LSTPexp)'**.