Response to Bradford on Avon Consultation Draft LCWIP: BoA LCWIP Stakeholder Group - March 2026

1. Introduction

The BoA LCWIP Stakeholder Group is an ad hoc group of residents and members, officers and representatives of active travel and allied advocacy groups, from the Bradford on Avon Community Area. Most of us have considerable experience, some professional, in active travel and environmental advocacy and of partnership or other work with local authorities.

We share Active Travel England's vision that at least 50% of all trips should be walked, wheeled or cycled, ideally by 2030 and believe that this target, including trips to/from public transport, is achievable in Bradford on Avon. We trust that Wiltshire Council does too.

We appreciate and thank Wiltshire Council's and AtkinsRéalis's LCWIP teams for engaging in the BoA LCWIP process (albeit several years late) and for the work done so far, which has great merit, is technically thorough, and reflects some elements of stakeholder input.

However, we came together out of shared concerns that the draft BoA LCWIP has diverged from DfT best practice, in at least one respect, and as a result has not been responsive enough to local inputs, nor to the opportunities identified in the 2013 cycle network map.

Apart from the governance issue, a key concern is the recourse to local knowledge. As DfT's LCWIPs Technical Guidance for Local Authorities says of network planning for walking, "*local knowledge is a crucial input and views should be sought from local stakeholders*." The same is of course true for cycling, where a desire line map is to be "*discussed with internal and external stakeholders to obtain their views, ensuring that all relevant information has been considered*." Evidence exists that this concern is shared by Divisional and Parish Councillors.

The route prioritisation has been too "algorithmic" and needs to benefit more from local knowledge of locations, opportunities, aspirations and recent or prospective developments.

We look forward to meaningful liaison in the immediate future as this LCWIP is finalised, and in due course to involvement in a revision of the Wiltshire-wide LCWIP, which we understand the Cabinet Member for Highways intends to commission soon, with WC and its consultants following the DfT's recommended process and involving such groups as ours from early on.

2. Key concern: Geographical scope

Bradford on Avon town is a small town, with about 10,000 inhabitants. It is compact and closely surrounded by four large villages. An LCWIP covering the four nearest will benefit over 2/3 more residents. Apart from Chippenham, Trowbridge and Salisbury, five other LCWIP towns have populations between 15,000 and 20,000: Calne, Warminster, Melksham, Tidworth & Ludgershall, Devizes and Westbury. On grounds of community value-for-money alone, there is a strong case for the wider BoA Community Area to receive LCWIP treatment.

A focus on the town should not exclude links to and measures within the villages. As Wiltshire LCWIP s2.3 Geographical Scope states, "*All of Wiltshire Council's Town Cycle Network Plans currently show a network within 5 miles (8km) of their respective town or city centres. These networks may be extended further where significant numbers of trips are likely to be made, as the current town cycle networks are updated to create LCWIPs for each area, e.g. extending the Bradford on Avon network to include routes to Winsley*".

2.1. Bradford-Winsley

The shared-use track on B3108 Winsley Road terminates at Down View to the East. The 2013 network map shows the intent to continue a cycle route eastwards.

The one-way Wine Street now has a TRO to make it access-only southbound, but with northbound contra-flow cycling. This is an important quiet connection with northwest Bradford including St Laurence School, and Winsley. **At least the section of LCWIP Route 9 between Downs View and Wine Street should form part of a priority cycle route**.

South of Newtown, there are at least walking opportunities between Barton Orchard and Barton Farm via the pedestrian rail crossing. One of us has been in touch with Network Rail, who are receptive to improvements and would be pleased to support a footbridge. This route is used regularly by some St Laurence School pupils. There are various options for a link to the railway station. Packhorse Bridge may in fact be an unidentified public bridleway.

2.2. Bradford-Westwood

(1) The claim in the Network refinement summary that there is "Not enough evidence of strong trip demand" is disputed. Jones Hill, with a gradient of over 1 in 10 in places, had the highest proportion of cycles in the quoted DfT statistics, at nearly 3%. The trip data excludes a natural route, via the flat traffic-free K&A canal and the Avoncliff-Westwood road, which is popular, and a much flatter road route via Frome Road and Elms Cross to Lower Westwood.

The Draft LCWIP identifies that relatively high levels of cycling to school are concentrated around the village of Westwood to the south west as well as around St Laurence School. Westwood was identified in the Core Strategy as a potential location for modest housing development.

(2) There is an active proposal brought by Westwood Parish Council to the BoA LHFIG, to close Elms Cross to through traffic. This is the shortcut between the B3109 Frome Road and Westwood Road. It carries a bus route. It forms part of the Wiltshire Cycleway (see Wiltshire LCWIP). A primary purpose is to make it more usable for active travel.

A route between the Moulton Drive mini-roundabout and the New Inn junction, Westwood should be in the BoA LCWIP. Possible measures: lower speed limits and junction alterations to benefit cyclists; footway on the existing verge and crossing points for walkers.

(3) The K&A towpath between Bradford and Avoncliff should be part of an included route, see below, as a link with Westwood.

2.3. Holt-Staverton-Trowbridge

Holt is a large village with close links to Trowbridge. The Parish Council and Wiltshire divisional Councillor wish to see active travel improvements including access to and from Trowbridge and Bradford as well as nearby Melksham.

There is a proposed development at Cereal Partners factory, Staverton, that will be in a position to contribute to active travel infrastructure, for its employees and the community.

The new Staverton Marina residential district is part of the Bradford on Avon Community Area but is effectively part of the Trowbridge built-up area. It is omitted from the Trowbridge LCWIP. It contains two primary schools and a recreation ground and lies between Staverton and Holt.

Unless Trowbridge LCWIP is revised and extended soon, the BoA LCWIP should cover this area, so that an extension to Trowbridge LCWIP Priority Route 2 links the town and employment, retailing and amenities at Canal Road to Staverton Marina and to Holt.

2.4. Holt-Bradford

A 'Quiet Lane' designation of the B3106, or alternative alignment, combined with the K&A Canal path (see below), offer a viable route between these closely related settlements.

3. Key concern: Market St, Silver St and "The Loop"

See BoA Traffic Study Report at https://bradfordonavontowncouncil.gov.uk/your-community/travel-and-transport/future-of-transport-traffic-modelling/ and https://bradfordonavontowncouncil.gov.uk/wp-content/uploads/2024/06/Bradford-on-Avon-Traffic-Study-Report-v4.0.pdf, especially S5.1.1. Option C Fig 5.3.
Respondents' top three key priorities when it comes to the BoA transport network are:

1. Reduced traffic volume
2. Improved pedestrian safety and comfort
3. Improved air quality (see the Copper Consultancy 'Future of Travel' survey report).

BoA Town Council's unanimous 24/09/2024 decision refers to "our top priority of pedestrian safety" and calls for a scheme with:

- *"...20mph speed limits throughout the town*
- *wider pavements being prioritised and maximised throughout the scheme*
- *one-way traffic east to west (downhill) on Silver Street*
- *serious consultative mitigation measures put in place from the start in any areas negatively impacted*".

These mitigation areas include what many locals call “The Loop” consisting of Mount Pleasant, New Road, Springfield, Holt Road (west), Woolley Street (south) and Silver Street. This is because all traffic management options increase southbound traffic volumes here.

The entire “Loop” should become a priority LCWIP route. A 20mph speed limit gives the opportunities to narrow carriageways, e.g. on Springfield where a lightly segregated up-hill cycle lane is an option, and Holt Road where we have received appeals from a number of residents that there should be a wide footway on the South side past The Hall. This important building is developing into the status of a principal attraction for the town. There is a non-existent bus stop, Stop ID: ‘wiladpjp’ named “The Hall”, where buses cannot stop because there is no footway. This is extremely unsatisfactory.

This priority route should include Market Street, where some footway widening is possible even with two-way traffic retained. A footway is needed on the upper west section. The Air Quality Action Plan includes the action of a reduction of the Town Bridge environmental weight limit from 18T to 7.5T. **This measure should be included in the LCWIP.**

The LCWIP should include active-travel wayfinding/signage plans, and indicative locations and targets for large quantities of conventional and secure cycle parking infrastructure.

4. Key concern: treatment of walking

The draft LCWIP’s treatment of cycling is stronger than that of walking. There is inadequate identification of existing walking routes, particularly on-road, where most everyday walking takes place. A map showing 800m and 1200m “Core Walking Zones” is not enough.

Bradford, with a number of steps, narrow alleys, and inadequate or missing footways, is one town where walking and cycling are distinct and LCWIP priority routes should not be one and the same set. Walkers have even less propensity than cyclists to divert to a ‘strategic’ route, and many prefer the most direct route unless there are serious obstacles.

This response is not the place for a large number of walking route evaluations, either using DfT’s Walking Route Audit Tool or otherwise. However, a better BoA LCWIP could deploy local knowledge in more depth. It could also take a more specific place-based geographical approach, for example by mapping the town’s and area’s steepest hills, and noting numerous illustrative sites, or preferred route sections, for features to encourage walking. These should include the Pedestrian Amenities listed in the ‘Wiltshire LCWIP Active Travel Infrastructure Design Standards’ (2022). Important examples are benches to rest on hills. Trees, shrubs and othe shade and public drinking water are increasingly important with climate change. There are some disused bus bays e.g. on Trowbridge Road at Southville Place, which could become pedestrian ‘hubs’ with seating and planters. This example is on a key walk-to-school route.

The LCWIP should reference the Town Council’s Climate and Ecological Emergency Strategy, which included several relevant measures:

- Deploy clear Climate and Ecological Emergency signage around the town.
- Create a Green Corridor - or a green wheel through and around the town.
- Plant hundreds of additional trees in the town and areas surrounding it.

5. Key concern: K&A Canal Path

NCN4, the Kennet and Avon Canal Path from Bath connecting Bradford on Avon, Trowbridge, etc. is listed in the Wiltshire Framework LCWIP as one of WC's improvement priorities, and is the only one of the 18 in the Prioritisation Table as having both "Very high Utility Trip potential" and "Very high Priority", as well as a number of other good indicators.

It makes no sense to improve only the inter-urban sections of NCN4. The towpath is heavily used in the Bradford area in spite of its poor condition that is not surprising as it has been largely un-maintained since it was widened and surfaced by Sustrans over 40 years ago. **It should be a priority route in the BoA LCWIP.** Here are comments on its various sections.

All sections are used by live-aboard boaters, who are recognised by Wiltshire Council as a disadvantaged group. They depend on it - car-free - to access schools, jobs, shops and amenities. The path is a visitor attraction of local, regional, national and global significance. **Improvement to a sealed surface, as at Bath - Bathampton, should be in the plan.**

5.1. Avoncliff to Swing Bridge

This section is part of a popular cycle commuter route to Bath, with potential for much greater use when improved. It is a walking and cycling link to and from Avoncliff itself, Westwood and Winsley (via a bridleway needing improvement), and links to a popular walking route to Freshford that could be upgraded to a cycle route. It is in very poor condition, resulting in trip deterrence, damage and soiling to footwear, bicycles, buggies, dogs, etc. and de facto widening at the expense of grassy verges. See photos.





5.2. Swing Bridge to Frome Road

This section is stony, but is heavily used by residents, boaters and visitors for a variety of trip purposes. The Frome Road crossing is misaligned with the desire line, causing safety issues.

5.3. Frome Road to Moulton Drive

This section is capable of being improved to adequate width in its context as a canal towpath, where not all LTN1/20 considerations need apply. The group's consensus is that an alternative using St Philip's Moorings and the car-coach park has an important role, both for users avoiding the busy towpath and for those walkers and cyclists unwilling or unable to use the steep step access to Moulton Drive, or the pinch point under the Moulton Drive bridge. However, the path itself will remain heavily used, and should be upgraded appropriately.

5.4. Moulton Drive to Trowbridge Road

This section forms part of two important routes to Trowbridge – A363 and NCN4. As with the previous section, an alternative route should also be designated at street level. There is scope for this on the grassed area east of Moulton Drive and John Rennie Close. The towpath is extremely narrow under Trowbridge Road, causing issues for wider and longer pedal cycles and presenting a hazard as the route becomes more popular. An at-grade crossing of Trowbridge Road, with some form of priority for path users over motor traffic at this "town gateway" location needs consideration, and will be feasible given a 20mph limit.

5.5. Trowbridge Road to Brick Lane, Trowbridge

This section is a key link between the two towns. For example, here are the walking times between the former Beehive pub and each of the two nearest budget supermarkets, which are heavily used by Bradford on Avon householders, not just those with the lowest incomes: **Lidl, via towpath: 38 minutes; Aldi, via A363 and local roads with heavy traffic: 52 minutes.** The Canal Road area of Trowbridge is a busy employment centre, with a new Apetito food factory proposed. Bradford residents use other amenities in that part of Trowbridge, such as Wickes DIY store, the Household Recycling Centre, Trowbridge Community Hospital and Marsh Road Nursery garden centre. A segment of Bradfordians using active travel prefer this route to central Trowbridge. There is reciprocal use of the towpath by Trowbridge residents.

6. Comments on some of the Priority Routes

We hope to have a further opportunity to engage with you on details before the LCWIP is finalised. Some of us may have sent you separate comments. However, here are a couple of collated remarks on the draft LCWIP proposed walking and/or cycling routes.

6.1. Trowbridge Road alternative route R1A

This should extend past the allotments and skirt the Golf Course, reaching the lane bearing Footpath BRAD19 that skirts Green Belt, instead of criss-crossing streets back to the A363.

6.2. Town Centre (or re-name) to St Laurence School R9A

The route should not start at the centre of Town Bridge! The relevant point is the Station Approach mini-roundabout, where St Laurence pupils converge and diverge. It need not extend to Ashley Road, as St Laurence users approach from the Winsley Road side.