



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Head of Planning & Development, Operations Directorate, SW Region,
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To: Wiltshire Council (FAO Mykola Druziakin)
developmentmanagement@wiltshire.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: PL/2025/03307

Location: Land West of Oakleigh Acres, Draycot Cerne, Chippenham, SN15 5LH

Proposal: Erection of B8 unit and associated works

National Highways Ref: NH/25/10827

Referring to the consultation on a planning application referenced above, in the vicinity of the M4 that form part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- a) offer no objection with advice (see reasons at Annex A);**
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- ~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

¹ Where relevant, further information will be provided within Annex A.

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to Planningsw@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature: *G Gallacher*

Date: 07 May 2025

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Annex A **National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We have undertaken a review of the relevant documents supporting the planning application to ensure compliance with the current policies of the Secretary of State as set out in DfT Circular 01/2022 "The Strategic Road Network and the Delivery of Sustainable Development" and the National Planning Policy Framework (NPPF). This response represents our formal recommendations with regards to planning application reference PL/2025/03307.

Reasons

The application (PL/2025/03307) seeks consent for a B8 unit providing 835sqm gross internal floorspace and accommodating a workshop and ancillary office accommodation. Additional hardstanding would be provided for staff parking and lorry storage. The application site would be accessed from the B4122, approximately 650 metres east of the junction with M4 J17. The application is made on behalf of a haulage company, DK Barnsley & Sons, currently based in Melksham. Melksham lies around 11 miles south of M4 J17 but is served by the A350 which leads north-south to the motorway junction. The haulage company wishes to relocate to a new site to enable expansion of their current operation, and they consider the application site a good location given existing use of the M4 for business travel.

National Highways primary consideration is for the ongoing safe and efficient operation of the M4 and J17 in particular and it is in this context that our comments are made.

The application site is located to the immediate east of the Indurent Park Chippenham site, an existing logistics park with consent (17/03417/OUT) for 1,000,000 sqft of Class B8 (storage and distribution) employment. The consented development delivered an improvement scheme at M4 J17 which was completed in 2023, signalling the A350 and B4122 approaches to the junction. Developer funding has also been secured for a shuttle bus service between Indurent Park and Chippenham bus station. National Highways has also been consulted on current applications for additional logistics premises, representing a further phase of the Indurent Park site (PL/2023/09891) and a standalone facility to the north of the motorway (PL/2025/02425). Both applications remain to be determined by Wiltshire Council pending comments from National Highways.

Wiltshire Council's emerging Local Plan supports additional national and regional logistics development adjacent to M4 J17 but does not allocate specific sites. Nevertheless, the submitted plan indicates that any proposals for additional logistics-based development must not prejudice the delivery of other planned growth. To accommodate planned growth, Wiltshire has submitted a bid for Government funding to deliver further improvements at M4 J17 under the Major Roads Network (MRN)

programme. Wiltshire Council is currently preparing a full business case for the works, and any successful bid would need to be supported by local funding sources.

The application is supported by a Transport Statement prepared by Paul Basham Associates (PBA) and dated January 2025. The Transport Statement advises that the proposed development will enable the applicant to increase staff numbers from 25 to 40 permanent staff members, increase car parking from 9 to 30 spaces, and provide additional hardstanding to accommodate up to 47 articulated vehicles. The Transport Statement indicates that the workshop and office are expected to operate between 8am-6pm Monday-Saturday, whilst the HGV operation is expected to be over 24-hours Monday-Saturday. A Travel Plan is also submitted as part of the application.

The Transport Statement estimates development traffic demands using the TRICS database. It is surprising that data could not be obtained for the current site in Melksham, which would presumably provide the most accurate basis for forecasting future increases in traffic demand. Instead, two TRICS trip rate scenarios have been applied by PBA to estimate traffic demand during the traditional morning and evening peak hours of 8-9am and 5-6pm. The first scenario applies average trip rates for commercial warehousing sites in suburban, edge of town and freestanding sites across England, whilst the second scenario applies trip rates from the nearby Indurent Park Chippenham application (17/03417/OUT). Both scenarios apply trip rates based on the floor area of surveyed warehousing units. However, PBA's trip generation estimates are based on the application site area (12,260sqm), rather than the proposed floor area (835sqm). This effectively assumes that a single large warehousing unit would occupy the entire site, which is not the case. As we understand at least some of the site will be used for HGV parking/storage, this approach potentially overestimates traffic generation. Notwithstanding this issue, the trip rate scenarios presented within the Transport Statement suggest that the development could generate 24-36 two-way vehicle movements in the 8-9am peak hour, and 25-44 vehicle movements in the 5-6pm hour. To understand the suitability of these estimates, National Highways has considered alternative TRICS trip rates based on staff numbers and car parking provision. Considering these alternative scenarios, the traffic generation estimates presented by PBA appear to be worst case.

Almost all vehicle movements generated by the development would be expected to pass through M4 J17 for access to the M4 motorway and the A350 north-south route. HGV arrivals are likely to be concentrated on the M4 slip roads, whilst departures from the site (whether staff or HGVs) will be concentrated on the B4122. Nevertheless, given the existing site location in Melksham, it is probable that some HGVs will already impact on M4 J17, limiting the scale of additional impact.

Overall, we consider that the peak hour trip generation figures submitted by PBA may well represent a worst-case scenario. Whilst additional staff and HGV storage areas will inevitably generate additional peak hour traffic demand, we do not foresee that the site will operate in the manner of a large warehousing unit (as has been assessed), and some of the site will be used for HGV temporary parking and storage. Although additional traffic demand will almost entirely impact on M4 J17, some vehicles may already be on the network, reducing the net impact of the development. On this basis, the residual traffic impact at M4 J17 is considered to be small, and unlikely to have a severe impact on junction performance.

However, emerging Local Plan policy is clear that additional logistics-based development must not prejudice the delivery of other planned growth. Whilst the current application is considered unlikely to have a material impact, it may be appropriate for Wiltshire Council to seek a proportionate financial contribution to the costs of planned improvements at M4 J17, which will ultimately allow the junction to accommodate wider increases in traffic demand through M4 J17.

Recommendation

National Highways has no objection to the proposed development but offers the planning authority advice to consider securing a proportionate contribution from the development towards identified highways mitigation at M4 J17, necessary to accommodate emerging local plan growth, as well as securing robust travel plan measures to support the take up of sustainable travel modes.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.