

**Chippenham Cycle Network Development Group (Cycle Chippenham)
Response to Planning Application: PL/2025/09200
49, 51 & 53 (Rowden Hill House), Rowden Hill, Chippenham, SN15 2AN**

Proposal

Full: Redevelopment and renovation of the existing site to provide, within the retained buildings: 1 detached dwelling, 5 flats, A terrace comprising 4 dwellings, alongside the erection of 1 self-build detached dwelling. A new one-way access road, Parking areas and footpaths, External landscaping and associated works, Installation of photovoltaics and air source heat pumps and site drainage features.

Outline: Construction of 6 detached self-build dwellings

Cycle Chippenham response

In summary: Whilst we welcome the redevelopment of this high-profile site, it is essential that this is done sustainably, and in a way that encourages active travel, including cycling.

Unfortunately, the proposals as they current stand introduce unacceptable highways safety risks. They also fail to comply with a number of local and national policies.

Therefore our current position is an objection, until such time as the highways safety issues are resolved.

The proposals would require those cycling to the site to ride on a route classed by the Department for Transport as cycle 'provision suitable for few people and will exclude most potential users and/or have safety concerns'.

Having this as the only cycle route to the site puts vulnerable road users at significant risk, and would merit a refusal on highways safety grounds.

However, this can be relatively easily addressed by providing a car-free or quiet-street link to the nearby cycle network, as set out in the options presented below.

There are some other design issues with the proposals, which also need addressing, and these are also outlined below.

We would also like to draw officers' attention to some inaccuracies and omissions in the applicant's submitted statements.

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1. Community and Stakeholder Engagement Statement inaccuracies

We welcomed the early engagement we had with the applicant, including a site visit. However, the bolded section of the following extract from the applicant's Community and Stakeholder Engagement Statement is inaccurate from the perspective of Cycle Chippenham:

*"The project team met with CTC and the Chippenham Cycle Network Development Group and NHS property Services to discuss opportunities for sustainable movement across and beyond the site. Feedback from these groups informed the site-wide movement and access strategy, **including improved pedestrian and cycle connections and integration with existing local routes.**"*

While we put forward multiple recommendations for how the site could be provided with connections to and integration with local cycle routes (more details below), none of our suggestions has been included in the proposed plans. Indeed, **the plans offer no safe cycle connections to local routes at all**, so it is incorrect to state that cycle connections with existing local routes have been improved through the stakeholder engagement process.

2. Transport Statement misrepresentation of cycling opportunities and significant highways safety risks for people cycling

The applicant's Transport Statement, at section 2.3.8, claims that: *"This review of cycle facilities and routes has identified that there should be no major obstacles to residents walking of cycling to / from the site and that the site should be well placed to encourage journeys by cycle."*

This statement, and the Transport Statement as a whole, completely disregard the fact that as proposed, the only legal way to cycle to the development site is to ride along the A4 Rowden Hill – where there are currently no cycle facilities.

Figure 4.1 of LTN 1/20 sets out the suitability of different road environments for cycling. We have reproduced it below for ease of reference.

Figure 4.1: Appropriate protection from motor traffic on highways

Speed Limit ¹	Motor Traffic Flow (pcu/24 hour) ²	Protected Space for Cycling			Cycle Lane (mandatory/ advisory)	Mixed Traffic
		Fully Kerbed Cycle Track	Stepped Cycle Track	Light Segregation		
20 mph ³	0					
	2000					
	4000					
	6000+					
30 mph	0					
	2000					
	4000					
	6000+					
40 mph	Any					
50+ mph	Any					

Provision suitable for most people

Provision not suitable for all people and will exclude some potential users and/or have safety concerns

Provision suitable for few people and will exclude most potential users and/or have safety concerns

Notes:

1. If the 85th percentile speed is more than 10% above the speed limit the next highest speed limit should be applied
2. The recommended provision assumes that the peak hour motor traffic flow is no more than 10% of the 24 hour flow
3. In rural areas achieving speeds of 20mph may be difficult, and so shared routes with speeds of up to 30mph will be generally acceptable with motor vehicle flows of up to 1,000 pcu per day

Source: LTN 1/20. © Crown copyright 2020.

The A4 Rowden Hill is a 30mph road, with no current provision for people cycling – so classes as 'Mixed Traffic'. Vehicle counts have not been provided, but it is reasonable to assume that the arterial nature of the road will place it at more than 2000 per day. LTN 1/20 therefore classes A4 Rowden Hill as 'Provision suitable for few people and will exclude most potential users and/or have safety concerns'.

Therefore, for the applicant's Transport Statement to suggest that there are no major obstacles to residents cycling to/from the site, is a potentially dangerous misrepresentation of reality.

On the basis that the only legal way to cycle to the site is classed by the Department for Transport as 'provision suitable for few people and will exclude most potential users and/or have safety concerns,' the application fails to meet a number of local and national planning policies, as listed below.

- **Wiltshire Core Policy 60**, since the development does not promote sustainable transport alternatives to the private car;
- **Wiltshire Core Policy 61**, since the development is not designed to reduce the need to travel by private car, does not encourage the use of sustainable alternatives, and has not given consideration to all transport users in line with the hierarchy set out in the policy, whereby cyclists are above private cars;
- **Chippenham Neighbourhood Plan Policy T1**, since the cycle routes within the development do not link to the existing town cycle network;
- **NPPF par 115a**, since sustainable transport is not prioritised;
- **NPPF par 115b**, since safe access to the site cannot be achieved for people cycling;
- **NPPF par 117a**, since cycle movements between the development and neighbouring areas have not been given priority;
- **NPPF par 117c**, since requiring people to cycle on A4 Rowden Hill creates conflicts between people cycling and vehicles.

Furthermore, NPPF paragraph 116 states that development may be refused on highways grounds if there is an unacceptable impact on highway safety.

On the basis that the only legal cycle route to/from the site is one the DfT classes as having safety concerns, **we believe that the proposals should be refused on highways safety grounds** unless a connection to the existing town cycle network is provided by the applicant as part of the site access arrangements. Importantly, this connection must be one that LTN 1/20 would class as 'provision suitable for most people' (i.e. green in the table).

In the next section, we outline what such linkages could look like.

3. Improvements required to make the development acceptable in sustainable transport terms

A. Off-site cycle link

As outlined above, there is no legal way to cycle to the site that would not result in significant highways safety risks, by requiring vulnerable people to cycle on one of Chippenham's busiest roads.

Requirement: To address this, the applicant needs to provide a link from the development site to the town's wider cycle network. The simplest way to achieve this would be to link to the Rowden Mile (shown in blue), along one of the routes shown in yellow the image below (A, B, or C). All of these would require the cooperation of the NHS, due to the routes passing over Chippenham hospital land.

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We raised the need for one of these routes with the applicant during our earlier discussions. The applicant indicated a willingness to provide such a link, which we welcomed.

At its presentation to Chippenham Town Council, the applicant indicated to councillors that it had raised the possibility of such a link with the NHS, but that the request had not been taken forward.

We are surprised that the NHS would be blocking a measure that would improve population health. Such a refusal would go against the Chief Medical Officer's recent statement that the population needs to walk and cycle more. We would therefore request that the applicant revisits this with the NHS, and trust that the NHS will work constructively with the applicant to find a solution.

If these links via the hospital site are not feasible, then another option, to get people from the development site to the town cycle network, via routes classed by LTN 1/20 as 'provision suitable for most people' must be provided as part of the site access requirements instead.

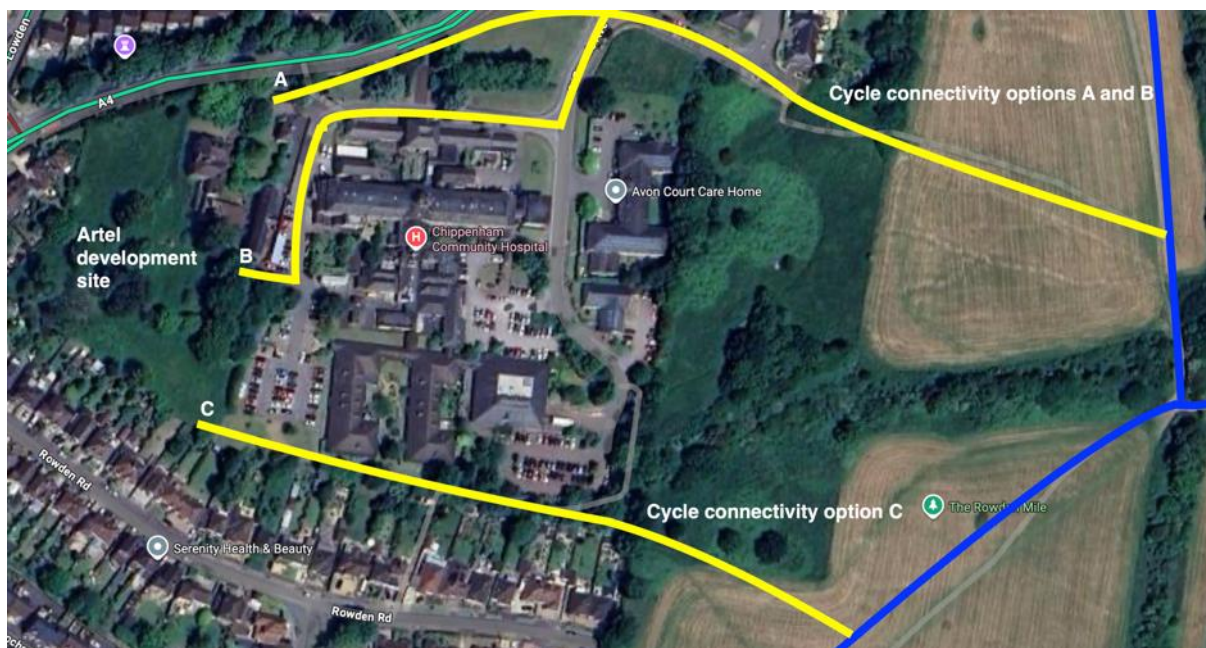


Image © 2025 Airbus, Maxar Technologies. Map data ©2025 Google. Additional annotations by Cycle Chippenham.

B. Junctions at Rowden Hill need to provide continuous footways

The footway along the south side of Rowden Hill is currently uninterrupted. The proposals appear to sever the footway in two places with traditional bellmouth junctions. This will result in a less safe and less pleasant environment for people walking and wheeling.

We have seen other examples of roads severing previously continuous walking and cycling routes in the area, including at the Malmesbury Road roundabout when

Kilverts Way was constructed. We must ensure new developments do not repeat the same mistakes.

Requirement: Best practice is now for such side road junctions such as these to have continuous footways, using Dutch entrance kerbs. These slow turning traffic, and provide a continuous, level path for people walking and wheeling.

This treatment also markedly improves driver adherence to Highway Code Rule H2, where they are required to give way to people crossing the side road, when turning in and out. Research found that adherence when there is a 'design treatment' such as a continuous footway increases from 43.3% to 89.7%, offering substantially enhanced safety for people walking and wheeling.

C. More details of visitor cycle parking required

We welcome the promise of visitor cycle parking. However, it is unclear from the Proposed Site Plan where this will be located, and how many spaces there will be.

Requirement: Details of the number and location of the visitor cycle parking needs to be provided. It is important that the visitor cycle parking is spread around the site, so that there are spaces close to the entrance of every dwelling.

D. Wider cycle store access doors required + interior dimensions of cycle stores

The proposed narrow access doors on the cycle shelters will make getting cycles in and out more difficult than it should be. It may also exclude certain types of cycle, such as cargo cycles, trikes, and trailers.

For example, the Proposed 51 Storage and Bins shows what looks like a single-width door, but ample space to be extended. The same is true for the stores for plots 49a-d.

Additionally, no dimensions are shown on the cycle storage drawings. These are required to ensure the Cycle Design Vehicle (1.2m wide x 2.8m long) can be accommodated.

Requirement: All cycle storage units require openings that can accommodate the Cycle Design Vehicle (1.2m wide).

Requirement: Dimensions for all cycle stores should be provided, to demonstrate that these will accommodate the Cycle Design Vehicle.

E. Clarity over residential cycle storage at no. 53 required

It is unclear from the Proposed Site Plan and Proposed 53 Ground Floor Plan where residential cycle parking is being provided for the newly converted flats.

Requirement: Details of the cycle storage facilities for the flats in number 53, including dimensions, need to be provided. These storage facilities need to accommodate the Cycle Design Vehicle (1.2m wide x 2.8m long).

ENDS