



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

From: Head of Planning & Development, Operations Directorate, SW Region,
National Highways
Planningsw@nationalhighways.co.uk

To: Wiltshire Council (FAO Gen Collins)
developmentmanagement@wiltshire.gov.uk

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

Council's Reference: PL/2025/09484

Location: Land north of Swindon Road, Royal Wootton Bassett

Proposal: Outline planning application with all matters reserved except for access for up to 135 dwellings, the creation of new vehicular access with footways from Swindon Road, provision of informal and formal open space, together with associated highways, landscape, earth works and level changes, foul and surface water drainage facilities, utilities provision and other associated and necessary infrastructure

National Highways Ref: NH/26/15383

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 (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

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: 24 March 2026

Name: Gaynor Gallacher

Position: Assistant Spatial Planner

National Highways: Ash House, Falcon Road, Sowton Ind. Estate, Exeter EX2 7LB

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

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/2025/09484.

Reasons

Background

The application is seeking permission for a residential development on a greenfield site located to the north of Royal Wootton Bassett. Access to the site will be provided via the A3102, which connects to M4 J16 approximately 2.5km to the east. Of the 135 dwellings proposed, 40% will be affordable. It is noted that the site did not form an allocation within the draft Wiltshire Local Plan which was recently submitted for examination.

National Highways primary interest in the application is in respect of the ongoing safe and efficient operation of the strategic road network, in this case comprising the M4 and J16 in particular. It is in this context that our comments are made.

Assessment of SRN traffic impacts

The application is supported by a Transport Assessment (TA), prepared by Pegasus. Pegasus estimate that the development will generate 55 two-way vehicle trips in the AM peak hour and 69 two-way trips in the PM peak, equating to a vehicular trip rate of 0.41 in the AM peak hour and 0.51 in the PM peak. The AM peak hour trip rate is considered low based on National Highways review of application material for other sites, including sites within the local area. Following assignment for individual trip purposes, Pegasus estimate that the development will add 22 vehicle trips (combined arrivals and departures) to M4 J16 during the AM peak hour, and 33 vehicle trips in the PM peak hour.

The submitted TA addresses some but not all of the comments raised by National Highways as part of pre-application scoping discussions. Whilst adjustments have been made in terms of development mode share and traffic distribution, we remain of the view that additional vehicle trips could pass through M4 J16. However, any impact on development trip volumes is unlikely to adversely impact assessment conclusions, and we consider that the level of additional traffic likely to be generated by the

proposed development does not warrant modelling of operational impacts at M4 J16 on this occasion.

We have arrived at this view following recent traffic modelling work undertaken in support of the emerging Wiltshire Local Plan and planning applications in the vicinity of M4 J16 (application references PL/2023/09142 and PL/2025/00700) and the wider Royal Wootton Bassett area (PL/2023/02129). The proposed development of 135 residential dwellings is not expected to alter the findings of this previous assessment work. However, any additional development that may come forward within the Royal Wootton Bassett area will need to be considered on its individual merits, and we reserve the right to request operational assessment of M4 J16 in the future to determine residual cumulative impacts.

To accommodate the traffic impact of identified growth in Royal Wootton Bassett, Wiltshire Council has proposed the delivery of small-scale highway improvements at M4 J16, a new Royal Wootton Bassett–Swindon cycle route, and enhancements to existing bus services. A separate planning application (PL/2023/02129) for development in Royal Wootton Bassett also submitted standalone assessment work for M4 J16. That assessment work recommended amendments to signal timings and re-validation of the MOVA (Microprocessor Optimised Vehicle Actuation) signal set-up at M4 J16 to mitigate the impact of the development which comprised up to 410 dwellings.

Despite recent announcements regarding the Wiltshire Local Plan, we would still advise Wiltshire Council to secure proportionate financial contributions towards transport measures identified as necessary to support future development in the Royal Wootton Bassett area. Given the proposed development will add to future traffic demand through M4 J16, we consider it would be appropriate to seek a contribution from the current application. We also expect the planning authority to secure robust travel plan measures to support and encourage the take up of sustainable travel modes.

Based on previous traffic modelling work, we also recommend that a planning condition should be attached to any consent the Council is minded to grant to secure a MOVA revalidation exercise at M4 J16. This measure has previously been identified to help accommodate development traffic increases and is equally applicable to the current application. Whilst the requirement may be brought forward by wider development in Royal Wootton Bassett, it would be consistent to secure these works by condition and guard against a situation in which the proposed development comes forward ahead of wider sites within the Royal Wootton Bassett area.

Recommendation

National Highways recommends that a planning condition should be attached to any permission Wiltshire Council is minded to grant in respect of planning application reference PL/2025/09484, to the effect that:

Prior to the occupation of the development hereby approved, the scope of a MOVA re-validation exercise for M4 J16 shall be agreed with the strategic highway authority, and the re-validation exercise completed in consultation with and to the satisfaction of the strategic highway authority.

Reason: to ensure that the operational traffic impacts of the development are managed in the interest of the safe and efficient operation of the Strategic Road Network in line with the requirements of DfT Circular 01/202.

National Highways also advises the local planning authority to secure proportionate contributions from the applicant towards transport measures identified as necessary to accommodate the development traffic impact of the emerging Wiltshire Local Plan, in accordance with DfT Circular 01/2022. We also advise the planning authority to secure robust travel plan measures to encourage and 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.