



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
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To: Wiltshire Council (FAO James Taylor)
Developmentmanagement@wiltshire.gov.uk

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

Council's Reference: PL/2026/04823

Location: Land at Forest Farm, Chippenham

Proposal: Outline planning application with all matters reserved except access from the A4/London Road for up to 600 dwellings, together with land for a local centre (Use Classes E and F), areas of open space and landscaping and associated infrastructure.

National Highways Ref: NH/26/17596

Referring to the consultation on a planning application referenced above, in the vicinity of the M4 that forms 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: 10 September 2026

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Position: Assistant Spatial Planner

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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 MHCLG National Planning Policy Framework (NPPF). This response represents our formal recommendations with regards to planning application reference PL/2026/04823.

Reasons

The application is in outline for up to 600 new dwellings plus a local centre. The site is located to the south-east of Chippenham and shares a boundary with the A4 London Road. The site effectively forms a south-eastern extension to the existing Pewsham residential area.

The principal interest of National Highways is the impact of the proposals on M4 Junction 17 (M4 J17) which lies around 10 kilometres driving distance to the north of the site. The A350 connects Chippenham with M4 J17 and is accessed to the north and west of the existing urban area. The A350 also provides access to the A4 and A420 which lead westwards towards Bath and the Bristol conurbation. There has been no pre-application engagement with National Highways.

The application documents include an Environmental Statement (ES) which contains a specific chapter on traffic and transport. The associated appendices include a Transport Assessment (TA) prepared by i-Transport which forms the basis of this review.

Planning and Infrastructure Context

The site is not allocated in the current development plan, the Wiltshire Core Strategy (adopted 2015) and Chippenham Site Allocations Plan (adopted 2017).

The site was proposed for inclusion as part of the Wiltshire Local Plan review (2020-2038), with a wider site allocation stretching between the A4 and A350 to the south of Chippenham. The draft site allocation (Land South of Chippenham and East of Showell Farm) was for a development of 2,525 dwellings, 15 hectares of employment land, local centre and schools, and would require a new transport corridor linking the A4 and A350. Whilst the Wiltshire Local Plan review was submitted for independent examination in November 2024, the plan was subsequently withdrawn in May 2026. The Council is now undertaking a scoping consultation for a new Local Plan. It is understood that the Wiltshire Core Strategy and Chippenham Site Allocations Plan continue to be the starting point for the consideration of planning applications.

Part of the application site was previously subject to an outline planning application (planning reference: 15/11153/OUT) for a mixed-use development including 200 dwellings and employment uses. The application was dismissed at Appeal in June 2017 following non-determination by Wiltshire Council. The main issues examined as part of the Appeal did not include transport or highways matters.

National Highways has also been consulted on a separate planning application (reference PL/2026/03545) for up to 400 dwellings, employment land, local centre and community uses on land east of Showell Farm, Chippenham. The site is located to the west of the Forest Farm development proposal, close to the A350. As a responsible highway authority, it is necessary for National Highways to consider the cumulative SRN impacts of the two live applications.

Wiltshire Council has been granted approval from the Department for Transport (DfT) to take forward plans to improve M4 J17 as part of the Major Road Network (MRN) programme. The Council previously submitted an outline business case (OBC) to the DfT, setting out the costs and benefits of the proposed capacity improvement scheme, which would see the junction fully signalised, with associated widening of the circulatory carriageway and junction approaches. Following approval of the OBC by the DfT, the Council are working to submit a full business case (FBC) later this year. Once the FBC has been approved by DfT, construction of the improvement scheme will commence.

Trip Generation

The application is for up to 600 dwellings, comprising a mix of 360 open market and 240 affordable dwellings. The assessment also accounts for traffic generation associated with a small convenience retail store as part of the local centre. Given the limited scale and catchment area, any impact of the local centre on the SRN is likely to be imperceptible.

Residential trip generation is based upon person trip rates derived from the TRICS database. Alternative trip rates have derived for privately owned housing and affordable/ Local Authority housing categories. In both cases, the TRICS analysis is based on a small sample of survey sites (just one survey in the case of affordable/ Local Authority housing) and is drawn from surveys undertaken between 2019 and 2022. It is unclear why more recent and comprehensive trip rate surveys have not been adopted.

National Highways does not typically accept the use of trip rates for affordable housing, due to concern over the make-up of TRICS survey sites and the potential for the share of affordable dwellings to reduce following any transport assessment. We would therefore recommend that all dwellings should be assessed on the basis of privately owned housing trip rates.

The TA estimates that the development would generate 551 two-way person trips in the traditional morning peak hour (8-9am) and 436 two-way person trips in the traditional evening peak hour (5-6pm). Based on our own interrogation of the TRICS database for privately owned housing, we consider that the adopted trip generation may be an underestimate of potential travel demands.

i-Transport disaggregate person trip generation by trip purpose using TEMPro baseline data for the Chippenham area. An element of retail demand has been assumed to remain internal to the development site due to the proposed local centre. Mode share assumptions for individual journey purposes have then been applied again based on TEMPro data for the Chippenham area. Finally, the TA applies a 10% reduction in car driver trips to account for sustainable transport measures proposed as part of the development. We understand the reduction is applied to all car driver trips, irrespective of journey purpose or destination. As journeys travelling via M4 J17 are less likely to have the potential to switch modes, we therefore question the suitability of a blanket 10% mode shift adjustment.

The TA estimates that 226 car driver movements will be generated by the development in the morning peak hour (8-9am) and 200 movements in the PM peak hour (5-6pm). This would equate to a vehicular trip rate per dwelling of 0.38 in the morning peak hour and 0.33 in the evening peak hour. Given the site location and limited on-site facilities National Highways has concern that the adopted trip rates may not be achieved and the adopted vehicular trip generation is likely to be an underestimate.

Trip Distribution

Alternative trip distribution methodologies have been applied for individual trip purposes. For commuting and business trips, 2011 Census travel to work data for the local area has been used to derive a trip distribution. Other journey purposes have been distributed according to the location of local facilities such as schools, shops, and leisure destinations. Trip assignment has then been undertaken using an online journey planning tool.

Given the distance between the application site and M4 J17, only selected journeys will impact on the motorway junction. The TA makes the following assumptions in terms of trip assignment via M4 J17:

- In terms of commuting and business trips, the TA estimates that 21% of vehicle trips will pass through M4 J17, with 9% of vehicle trips routing to/from the M4 West, 4% to/from the A429 and 8% to/from the M4 East. A further 23% of commuting and business trips are assumed to use the A420 or A4 for journeys west towards Bristol and Bath.
- 12% of retail trips and 27% of leisure and personal business trips are assumed to travel to Bristol and Swindon. In both cases, three quarters of trips to Bristol and half of trips to Swindon are assumed to use the M4 motorway. No other destinations for retail, leisure and personal business trip purposes are assumed to impact on M4 J17.
- No education trips are assumed to impact on M4 J17.

Overall, the trip distribution and assignment assumptions appear reasonable given the site location and are accepted for assessment purposes.

SRN Impacts

Traffic flow diagrams appended to the TA only distribute traffic as far as central Chippenham and do not demonstrate development traffic impacts at M4 J17. Similarly, no operational assessment has been undertaken for M4 J17.

Drawing on our own estimates of multi-modal trip generation alongside the applicant's own assumptions regarding journey purpose, mode share and assignment, we estimate that the development has the potential to add around 40 two-way trips to M4 J17 in the traditional morning and evening peak hours.

In the morning peak, development traffic will principally add to demand on the A350 northbound approach to the junction, where long queues can currently form. In the evening peak, development traffic will be distributed across the junction, reducing the impact on any one individual approach.

Whilst no operational assessment has been undertaken, the estimated trip volumes at M4 J17 are considered to be limited and unlikely to materially impact junction performance or any individual slip road.

Policy TR6(4) of the NPPF states that, *“Development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety; taking into account any mitigation measures proposed as well as any wider network improvements, including measures to support sustainable patterns of movement”*.

Whilst National Highway must consider the impact of the proposed development alongside that of the nearby application for 400 dwellings at land east of Showell Farm (reference PL/2026/03545), the additional traffic demand is not expected to result in a severe adverse impact on the transport network or an unacceptable safety impact for the M4.

Subject to DfT approval of the FBC, Wiltshire Council is seeking to bring forward network improvements in the form of the M4 J17 MRN scheme. The scheme was identified to accommodate proposed growth under the now withdrawn Local Plan review and will support the transport network to accommodate current development proposals. Whilst the impact of the current application is not considered to be significant or severe, it may be appropriate for Wiltshire Council to seek a financial contribution to the costs of the M4 J17 MRN scheme. We would also expect the local planning authority to secure a robust travel plan to secure the sustainable transport measures necessary to support the proposed trip reductions.

Recommendation

National Highways has no objection to application reference PL/2026/04823 but offers Wiltshire Council advice to consider seeking an appropriate contribution from the development towards the M4 J17 MRN scheme, and securing a robust travel plan to secure sustainable transport measures and encourage the take up of alternative travel modes to the private car.

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 Policies TR3 and TR4 advising that significant development should offer a genuine choice of transport modes

and 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.

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