



Active
Travel
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Your Ref: PL/2026/04823
Our Ref: ATE/26/01399/OUT
Date: 16/09/2026

Active Travel England Planning Response Detailed Response to an Application for Planning Permission

From: Spatial Planning Service, Active Travel England

To: James Taylor - Wiltshire Council

Application Ref: **PL/2026/04823**

Site Address: **Land at Forest Farm, Chippenham**

Description of development: *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.*

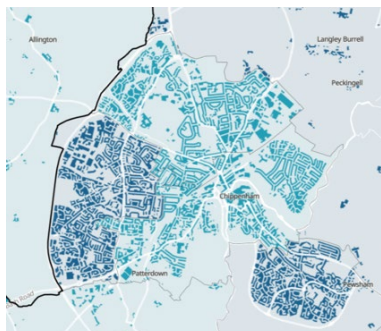
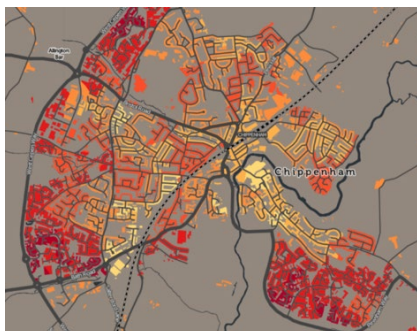
Notice is hereby given that Active Travel England's formal recommendation is as follows:

Deferral: ATE is not in a position to support this application and requests further assessment, evidence, revisions and/or dialogue as set out in this response in accordance with national planning (**NPPF**) policies **DP3, TR3, TR4, TR6 and P5**.

1.0 Background and Summary

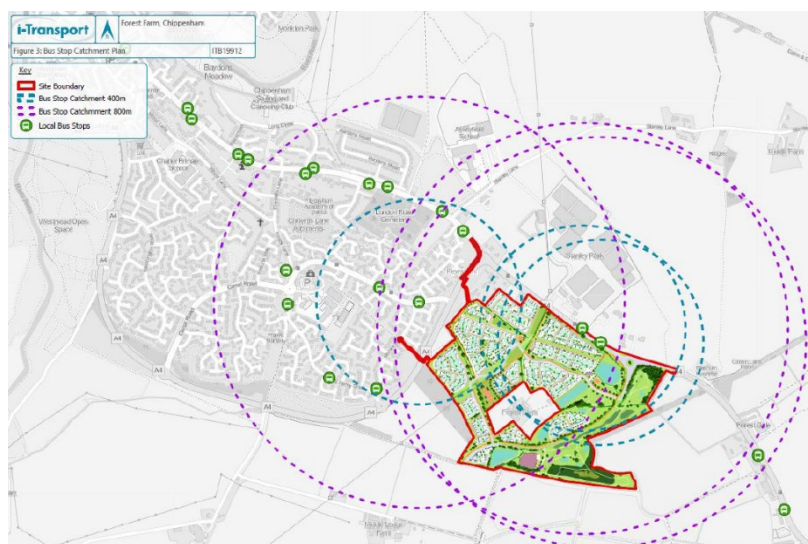
1.1 Active Travel England (ATE) welcomes the opportunity to provide recommendations on the above planning application, which – if approved – would deliver a new community of up to 1,500¹ people. Following consideration of the submitted Transport Assessment (TA), Travel Plan (TP), Design and Access Statement (DAS), Illustrative Masterplan and other associated drawings and reports.

- Existing travel behaviours exhibited within the adjacent Pewsham area and confirmed in the Travel Plan demonstrate high levels of car dependency, as illustrated in the 2011 and 2021 census (below left and right).



¹ Based on 2021 Census average household size

- From the assessments analyses and solutions presented within the TA, it is difficult to see how the proposed development will improve upon existing mode shares in the absence of significant and sustained investment in wider active travel linkages, particularly to Chippenham town centre and rail station.
- Each of the above destinations lie considerably outside of a convenient or reasonable walking distance of the site as illustrated in the Transport Assessment (TA) **Image 3.3** (below), but which are demonstrably within a reasonable cycling distance, as confirmed in **TA Table 3.3**.



- As a result of the above, cycling will be the principal non-motorised mode of travel for many everyday journeys, yet the application does not demonstrate how safe, direct and attractive cycle connections to Chippenham town centre, the railway station and other key destinations will be delivered.
- Insufficient regard is paid towards the **Chippenham Local Cycling and Walking Infrastructure Plan (LCWIP)** and its identified strategic active travel corridors given the reliance on these routes for everyday leisure and access to the countryside as well as for regular utility trips.
- If these proposals are to proceed, off-site improvements must go much further than what is being proposed and be delivered to modern specifications that are both physically and personally safe and in a way that gives *first priority* to active travel modes if the site is to benefit from an attractive, safe, continuous and coherent active travel network capable of supporting a new community of up to 1,500 people.
- In respect of masterplanning, the proposed development is fragmented into a series of separate built parcels, some of which are poorly related to neighbouring communities and local facilities they will rely on, with the southern parcel particularly isolated. These aspects are more likely than not to reinforce car dependency.
- The Travel Plan sets an unambitious baseline and targets, relying on outdated 2011 Census data and proposing only modest improvements to this situation rather than committing to the level of modal shift required to achieve a genuinely vision-led outcome that reflects government objectives, targets and policies in 2026.

2.0 Strategic Planning and Infrastructure Delivery

- 2.1 From a wider perspective and while such work was previously under way, in the absence of an Inspectorate-validated Local Plan, ATE raises concerns that the application is not yet underpinned by an adopted and defined infrastructure delivery plan, programme or funding mechanism. This would ensure proportionate physical and/or financial contributions from this site towards the delivery of a comprehensive active travel network.
 - 2.2 The concern is therefore that development undertakes this work in advance of and in isolation through the lens of its own individual impacts and requirements, rather than holistically alongside other allocations towards a sustainable and connected network for the town. The consequence is that the individual contributions of separate developments when added together will not deliver a solution that is equal to the sum of their wider impacts and requirements. This is evident in the reporting and proposed off-site active travel interventions, which tend towards connections to existing and deficient infrastructure, rather than contributions towards delivering an active travel network for Chippenham.
 - 2.3 As a result, insufficient evidence has been provided to demonstrate that the active travel infrastructure required to support sustainable movement patterns towards a vision-led and sustainable outcome that is properly tested, identified, funded and ultimately secured. ATE is therefore unconvinced that the development in its current format will achieve the outcomes required by the policies contained within **Chapters 14 and 15** of the **National Planning Policy Framework (NPPF)**.
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3.0 Travel Patterns, Mode Share and Trip Generation

- 3.1 The TA relies upon an outdated business-as-usual assessment and distribution methodology that is confined to assigning only vehicular trips during traditional highway peak-hour periods. This does not represent an inclusive or satisfactory assessment, given that the multi-modal movements of the community throughout the day are unquantified and therefore risk being de-prioritised. As such, this fails rather than passes the requirements of the **ATE Planning Assessment Toolkit** which is referred to in **TA 1.4.1**.
- 3.2 Allied to the above, the TA treats the ATE Planning Assessment Toolkit as a checklist rather than the critical and qualitative analysis required by the tool. The outcomes of the TA are therefore inconsistent and at odds the vision-led transport planning principles established in the NPPF which require development to be planned around sustainable movement outcomes that give first priority to walking, wheeling and cycling within the site and the surrounding area.
- 3.3 Existing travel patterns within the existing Pewsham community demonstrate significant levels of car dependency, as evidenced in each of the 2011 and 2021 Census. From the forecasts presented within the TA and Travel Plan (TP), it is difficult to identify how the proposed development will avoid merely replicating these patterns in the absence of substantial investment in strategic active travel connections to key destinations to the northwest including Chippenham's town centre and railway station.

- 3.4 ATE also raises concerns regarding the Travel Plan baseline and targets. The reliance on 2011 Census data establishes an exceptionally low benchmark against which performance is measured and is unlikely to drive meaningful behavioural change going into the 2030s, where current government policy included in the third **Cycling and walking Investment Strategy (CWIS3)** sets a target for 55% of trips in towns and cities to be made by walking, wheeling and cycling. In this respect the TA is out of date, referencing the twice-superseded CWIS document of 2017 (**TA 3.5.8**). Nevertheless, and while the CWIS quote argues the potential for a “**significant potential for change in travel behaviour**”, this only holds where accompanied by a consistent network of high-quality infrastructure.
- 3.5 The Travel Plan seeks only modest improvements to 2011 data and travel patterns that are likely to be in excess of twenty years previous by the time the development is fully occupied. Consequently, this aspect of the application sits entirely out of kilter with modern expectations for a vision-led outcome, and the application will most likely fail to demonstrate how it will achieve meaningful modal shift if required to meet such a low bar.

4.0 Off-site walking, wheeling and cycling infrastructure

- 4.1 National planning policy requires the provision of a genuine choice of travel modes. While bus services will play an important role in this mix, their existence does not diminish the need to provide safe, direct and attractive walking, wheeling and cycling infrastructure connecting the site to key destinations.
- 4.2 Distances between the site, Chippenham town centre and Chippenham railway station mean that cycling represents the principal active travel mode capable of delivering meaningful modal shift. However, the TA fails to demonstrate how this outcome will be achieved or what infrastructure will be delivered to support it beyond the immediate vicinity of the site.
- 4.3 There is little in the way of a critical and qualitative assessment of the quality of walking, wheeling and cycling opportunities beyond the site accesses that will be available to future residents and visitors to the development. Instead, the TA provides a merely descriptive run-through of where footways, footpaths and linkages exist. No account is taken of their quality, levels of natural surveillance, width, lighting or whether local infrastructure complies with national cycling design standards in accordance with **LTN1/20**. Further to this, the safety of women and girls is not considered in alignment with **NPPF policies DP3.2f, TR4.1c and P5.1a**. While the TA may precede the current NPPF, such considerations for personal safety have been embedded within national planning policy for a considerable time.
- 4.4 The **LCWIP** is referenced within the submitted documentation although the proposed solution does not meaningfully build upon its conclusions or identify the infrastructure necessary to support a development of this scale and link it to its town centre. This risks largely repeating the isolated nature of the existing 1980s-1990s Pewsham development. In particular, insufficient consideration is given to the Pewsham Corridor (PC09), Route CC05 and the Rawlings Green-Pewsham Corridor (PC13).

- 4.5 The off-site improvements proposed by the applicant represent a start, but in isolation are considered unlikely to contribute towards a continuous, coherent and legible active travel network that would be required to support a community of up to 1,500 homes.
- 4.6 ATE acknowledges the proposed improvements towards the secondary school; however, these appear to cease abruptly on the southern side of London Road, some distance from the school itself. Students would therefore be required to continue their journey via an informal crossing refuge and a substandard 1.8m footway width on the northern side of the road. In these circumstances, cyclists are therefore required to join a carriageway that does not meet the design or volumetric thresholds mixing cyclists with traffic **LTN1/20- Figure 4.1**. This does not represent an accessible, consistent or inclusive or design or policy-compliant outcome when considered against **NPPF** policy and modern design expectations.
- 4.7 The development will be highly reliant upon its accessibility to services within the existing Pewsham local centre. Although the proposed improvements to the route towards the district centre is a necessary intervention, concerns remain regarding personal security and passive surveillance along this route and whether this will feel safe at all hours of the day.
- 4.8 Linked to the above, and while a reasonably direct linkage from Pewsham Way to Monks Way and onwards, the **Illustrative Masterplan** and **Access and Movement Parameter Plan** fail to maintain the directness and convenience of this route within the site itself, instead creating circuitous pedestrian and cycle routes that maximise travel distances. This is contrary to **NPPF** policies **TR4.1b** and **TR8**, which expect permeable and direct networks for active travel.

5.0 Masterplan and Placemaking

- 5.1 The illustrative masterplan appears fragmented, creating a series of separate development parcels rather than a coherent and integrated community. A number of parcels appear to face away from each other and the local facilities upon which future residents will depend, potentially creating areas of poor surveillance and instead – along the southeast boundary - orientating towards what may become a heavily trafficked bypass corridor in the future. Such an arrangement risks reinforcing car-dependent lifestyles while undermining opportunities for active travel.

6.0 Next Steps

- 6.1 ATE considers that the application currently fails to demonstrate compliance with a number of policies set out in **chapters 14, 15 and 17 of the NPPF**.
- 6.2 The TA does not adequately assess mode share or non-car trip generation, fails to demonstrate how existing car-dependent travel patterns exhibited by Pewsham will be avoided, does not meaningfully engage with the active travel infrastructure priorities identified within the Chippenham LCWIP, and provides insufficient evidence that a continuous, attractive and safe cycling network can be delivered between the site, Chippenham town centre and the railway station.

- 6.3 The fragmented masterplan further risks embedding social isolation and private vehicle dependency while failing to provide the direct, convenient and inclusive movement network expected by national policy.
- 6.4 ATE therefore recommends deferral pending further assessment, revisions to the transport strategy, masterplan and parameters plan and the identification of a comprehensive package of active travel infrastructure contributions capable of supporting a genuinely sustainable new community.