



National Highways Planning Response (NHPR 26-09) 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/2026/03545

Location: Land east of Showell Farm, Chippenham

Proposal: Outline Planning Application for up to 400 dwellings (Class C3 use), land for a Local Centre, accommodating commercial, business and service uses (Class E use), drinking establishment and hot food takeaway (Sui Generis); and local community uses (Class F2); open space and landscaping to include natural green space, amenity green space, area of formal play, allotments and community orchard, sustainable drainage infrastructure and ground remodelling. All matters reserved except for the formation of a new vehicular access and cycle and pedestrian access including emergency access onto the B4528.

National Highways Ref: NH/26/17721

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

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: 16 September 2026

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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 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 400 new dwellings plus a local centre. The site is located to the south-west of Chippenham and shares a boundary with the B4258 Patterdown Road. Vehicular access will be taken from Patterdown Road. The site extends to the south of an existing area of ongoing residential development known as Rowden Park.

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 meets with the B4258 Patterdown Road to the immediate south-west of the application site. 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 transport and access. The associated appendices include a Transport Assessment (TA) prepared by Ridge which forms the basis of this review. A Framework Travel Plan (FTP) is also appended to the ES.

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 Allocations Plan allocated land at South West Chippenham to the immediate north of the application site. Planning permission has since been granted for around 1,650 dwellings and employment land across various sites including the neighbouring Rowden Park development. It is understood that the Rowden Park development will also deliver a new primary school and local centre facilities. A new bus service between the area and Chippenham town centre commenced earlier this year, with funding understood to be secured from local development.

The site was proposed for inclusion as part of the Wiltshire Local Plan review (2020-2038), with a wider site allocation stretching between the A350 and A4 London Road 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 A350 and A3. 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.

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.

An outline planning application (reference PL/2023/04417) for 450 dwellings was previously submitted on the same site. Whilst the application was subsequently withdrawn, National Highways responded on 18 July 2023 to offer no objections subject to advice that Wiltshire Council should consider seeking a contribution towards the MRN scheme and robust travel planning measures.

National Highways was also recently consulted on a separate planning application (reference PL/2026/04823) for up to 600 dwellings and a local centre on Land at Forest Farm, Chippenham. The site is located to the east of the Land East of Showell Farm development proposal, close to the A4 London Road. National Highways has offered no objection to the application, subject to advice that a contribution towards the MRN scheme should be sought. However, as a responsible highway authority, it is necessary for National Highways to consider the cumulative SRN impacts of the two applications.

Trip Generation

Ridge estimate residential trip generation based on vehicular trip rates from the TRICS database. No allowance has been made for any additional trips generated by the proposed local centre. However, given the limited scale and catchment area, it is accepted that any impact of the local centre on the SRN is likely to be immaterial.

Residential trip rates have been derived for privately owned housing, which is considered appropriate. The adopted trip rates of 0.474 trips per dwelling in the morning peak hour (8-9am) and 0.463 trips per dwelling in the evening peak hour (5-6pm) result in traffic generation estimates of 190 vehicle movements in the morning peak and 185 in the evening peak.

Ridge disaggregate vehicular trip generation by trip purpose using National Travel Survey data for car and van drivers, covering the five-year period 2015-2019 inclusive.

No allowance has been made for trip-chaining effects, whereby journeys involve a series of consecutive trips, such as dropping children at school en route to work. The effect of trip chaining is to typically underestimate the share of commuting and business-related journeys.

An element of demand for shopping and personal business trips has been assumed to remain internal to the development site on account of the proposed local centre. Ridge also apply a 10% reduction in car driver trips to account for increased working from home and Travel Planning measures proposed as part of the development. The reduction is applied to all car driver trips, irrespective of journey purpose or destination.

Overall, the TA estimates that 154 car driver movements will be generated by the development in the morning peak hour (8-9am) and 151 movements in the PM peak hour (5-6pm). This equates to an external vehicular trip rate per dwelling of 0.39 in the morning peak hour and 0.38 in the evening peak hour. Given the site location, National Highways has concern that the adopted vehicular trip generation could be an underestimate.

Trip Distribution

Trip distribution has been based on 2011 Census travel to work data for the local area. Trip assignment has then been undertaken using an online journey planning tool. On this basis, Ridge estimate that 19% of all external trips will pass through M4 J17. Based on the adopted trip generation assumptions, this equates to around 30 vehicle movements.

SRN Impacts

Ridge assess development impacts on M4 J17 by way of a percentage traffic impact assessment, drawing on baseline traffic flows from the Wiltshire Traffic Model and projected growth in traffic demand. National Highways does not typically accept the use of a percentage impact assessment as they fail to account for existing operational issues and ignore potential impacts associated with smaller-scale traffic increases.

Although we consider that external traffic demand may be higher than estimated by Ridge, we also consider that the adopted distribution may overestimate SRN trips due to the application of a travel to work-based distribution for all journey purposes. Notwithstanding these differences and drawing on alternative trip generation and distribution assumptions, we concur with Ridge's estimate that the development has the potential to add up to 30 two-way trips to M4 J17 in the traditional morning and evening peak hours.

The estimated trip volumes at M4 J17 are considered to be limited and unlikely to materially impact junction performance or any individual slip road. 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.

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 600 dwellings on land at Forest Farm (reference PL/2026/04823), the additional traffic demand is not expected to result in a severe adverse impact on the SRN nor an unacceptable safety impact for the M4.

Subject to DfT approval of a full business case, 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.

Recommendation

National Highways has no objection to application reference PL/2026/03545 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 UK Government has committed to achieving net zero greenhouse gas emissions by 2050 through amendments to the Climate Change Act 2008. The National Planning Policy Framework (NPPF) supports this objective, with Chapter 5 recognising the need to support the transition to a low carbon future and contribute to achieving net zero by 2050. Policies CC2 and TR3 promote sustainable patterns of movement, reduce reliance on the private car and seek to ensure that significant development is located where it offers a genuine choice of transport modes.

Policies TR3 and TR4 also advise that opportunities to improve walking, wheeling, cycling and public transport should be taken up as part of a vision-led approach to creating sustainable, inclusive and well-connected places.

These considerations should be weighed alongside any relevant Development Plan policies to ensure that planning decisions support sustainable travel patterns and align with the transition to net zero by 2050.