For the Attention of Charmian Burkey

Dear Charmian

M4 J17(T): MIXED USE URBAN EXTENSION COMPRISING RESIDENTIAL (CLASS C3), LOCAL CENTRE (CLASS A1-A5) AND (CLASSES D1 AND D2), PRIMARY SCHOOL, LAND AT ROWDEN PARK, CHIPPENHAM

Thank you for consulting the Highways Agency on the above planning application. We have considered the submitted information and provide comments below. The comments made in this letter reflect National Planning Policy Framework (2012) and DfT Circular 02/13 Planning and the Strategic Road Network (SRN).

Development Proposals

The application is proposing up to 1,000 residential dwellings, including 60 care homes, a primary school and local community facilities, expected to be a number of small shops. The development is located to the south of Chippenham, and is some 7KM from the Strategic Road Network (SRN). The SRN is accessed from the development site via the A350, and the SRN in this location comprises of the M4 and J17.

The Agency has been involved in pre-application discussions with the applicant, and our advice has been contained in letters dated 28 November 2013 and 05 August 2014. In our advice the Agency made it clear that any development proposals coming forward should accord with Circular 02/2013, and particular attention should be drawn to the modelling requirements set out within the Circular.
Section 2 of the Transport Assessment (TA) outlines the policy background which supports the development. Para 2.2.19 states that whilst the Rowden Park development is located within the strategic area of search the sites allocation DPD which would allocate this site in the Core Strategy has not yet been prepared. The Agency would welcome further clarification on this point.

**Trip Generations**

The trip generations have been taken from rates used by Wiltshire Council in the work done for the Transport Strategy for Chippenham. Having considered the trip rates presented, the Agency is content with their use in the assessment. Modal split assumptions have been taken from 2011 census data, and again the Agency accepts this.

**Trip Distribution and Assignment**

The Transport Assessment relies heavily on the Wiltshire Council PARAMICS model. This has been used to both distribute and assign trips, and also provides details on the impact at J17 which will be discussed in more detail later in this letter. Whilst the Agency is broadly accepting of the use of PARAMICS to distribute and assign trips, there is limited supporting information within the TA to outline the specifics of how this has been done.

Fundamentally the Agency needs to understand how the model has been produced, the key inputs to the model including the origin/destination of traffic and how vehicles have been assigned to these routes. There are no details within the TA of the validation of the model, and it is assumed there is a LMVR which supports the wider PARAMICS model.

The Agency is not questioning the validity of the modelling or the conclusions drawn from this, however we do require further clarification to ensure that the correct volume of traffic has been assigned to the SRN. This is particularly key given the capacity constraints at J17 of the M4.

**Impact at J17**

Notwithstanding the above comments; 2 scenarios have been presented which demonstrate the impact on J17. Within the PARAMICS model these are referred to as Scenarios 1 and 3. Scenario 1 is summarised as a 2026 ‘worst case base’ and Scenario 3 is a 2026 worst case base + development + mitigation. This mitigation is assumed to be entirely on the local road network.
The Circular is clear that any assessment of the SRN should include an opening year (assuming all development is occupied) as well as 10 years post registration of the application, or the end of the local plan review period. In the first instance this 2026 assessment would suffice for the 10 year horizon period, however there is no assessment of the opening year on the SRN.

Having considered the results presented in Table 8-10 of the TA; the Agency is concerned with the conclusions drawn that the impact on the SRN does not warrant any further assessment. Percentage impacts can be misleading, especially when considering busy junctions. For example the B4122 shows a relatively large percentage impact of 4.52% in the PM Peak, but in actual terms the increase in vehicular numbers is only 10. Likewise the A350 shows a smaller percentage impact of 3.64%, but the actual vehicle numbers are higher at 51 in the PM peak.

The Agency would request clarification on the impact of traffic on J17, specifically the M4 arms. It is assumed from the table that M4 West approach is the off slips, and the exit is the on slip; but further clarification is requested here. There appear to be a number of arms which show a decrease in traffic between the two scenarios, for example the M4 west exit arm in the PM peak. It is not clear what mitigation on the local road network would cause this decrease in traffic and further clarification is sought here.

It would also be useful to be presented with the results of the Scenario 2 modelling, which is the 2026 worst case + development. This would give an accurate assessment of the impact of just this development at J17 without any mitigation. Notwithstanding the above comments; based on the information provided at present and in lieu of an assessment which just considers the impact of the development without mitigation; the Agency would have no choice but to direct conditions relating to the wider mitigation measures on the Local Road network, as the conclusions within the TA and assessment completed rely heavily on this mitigation being in place. Providing a comparison between Scenarios 1 and 2 would provide greater clarity on whether the mitigation measures on the Local Network are required in order to make the development acceptable to the HA.

Again, whilst the level of traffic suggested within the TA is concluded to not be significant, the Agency would consider that the increases of vehicles shown between Scenarios 1 and 3 to be of the magnitude that additional testing of the operation of J17 is required. Again, this should consider an opening year assessment.
Summary

At this time the Agency is unable to accept the development proposals, due to a lack of clarity regarding the impact of the development on the SRN.

In order for ongoing discussions to take place and for the applicant to provide the additional information that we have requested, the Highways Agency is issuing a Direction of Non-Approval on the application for a period of six months. However if sufficient information comes forward before the end of the six month period, the Agency will be able to remove the Direction of Non-Approval replacing it with one directing conditions or offering no objections. The attached form TR110 confirms this.

I trust this is useful; should you have any queries in the meantime please do not hesitate to contact me.

Yours sincerely

[Signature]

Tom Elliott
Asset Manager
NDD (South West Planning) – Growth & Improvement Team
Email: tom.elliott@highways.gsi.gov.uk
Developments Affecting Trunk Roads and Special Roads
Highways Agency Response to an Application for Planning Permission

From: Divisional Director, Network Delivery and Development, South West Highways Agency.

To: Wiltshire Council

Council's Reference: 14/12118/OUT

Referring to the notification of a planning application dated December 2014 your reference 14/12118/OUT in connection with the M4, mixed use urban extension comprising residential (class C3), Local centre (class A1-A5) and (classes D1 and D2), primary school, land at Rowden Park, Chippenham, notice is hereby given under the Town and Country Planning (Development Management Procedure) (England) Order 2010 that the Secretary of State for Transport:-

a) offers no objection;

b) advises that planning permission should either be refused, or granted only subject to conditions

c) directs conditions to be attached to any planning permission which may be granted;

d) directs that planning permission is not granted for an indefinite period of time;

e) directs that planning permission not be granted for a specified period (see Annex A).

(delete as appropriate)

Signed by authority of the Secretary of State for Transport

Date: 28 January 2015

Name: Tom Elliot
The Highways Agency: Level One
Ash House
Falcon Road
Sowton Industrial Estate
Exeter EX2 7LB

Position: Asset Manager
Condition(s) to be attached to any grant of planning permission:

Reason(s) for the direction given at b), c) or d) overleaf and the period of time for a direction at e) when directing that the application is not granted for a specified period:

Wiltshire Council shall not grant planning permission for planning application ref 14/12118 for a period of 6 months from the date of this direction for the following reasons:

To give the applicant time to submit additional information to enable the Highways Agency to assess the impact of the development on the M4.