For the attention of Charmian Burkey

Dear Charmian,

Rowden Park Patterdown Road Chippenham Wiltshire

14/12118/OUT : Mixed Use Urban Extension Comprising Residential (Class C3), Local Centre (Classes A1-A5) and (Classes D1 and D2), Primary School, Public Open Space Including Riverside Park and Allotments, Landscaping, 4 Vehicular Accesses, Site Roads and Associated Infrastructure.

Thank you for providing the Highways Agency (Agency) with the opportunity to comment on the above mentioned planning application. In continuing our audit, please find below the Agency’s latest position in respect of the proposals and consideration of the Strategic Road Network (SRN) in particular the M4.

In addition to the planning application submission documents, the Agency has reviewed the recently submitted Peter Brett Associates (PBA) Technical Note dated 25th February 2015. Comments reflect the Agency’s views in line with current policy requirements, namely NPPF and Circular 02/2013 “The Strategic Road Network and the Delivery of Sustainable Development.”

Trip distribution / assignment
Prior to the consideration of traffic modelling, clarification is sought on proposed development trips anticipated to impact on the SRN. PBA have considered trip distribution / assignment via the Wiltshire S-Paramics which is now not a model acceptable to the Agency. From the model outputs, it is not possible to determine how specific vehicle route choices are made, and if traffic movements are robustly being assigned via M4 Junction 17.

The Agency requests that the origins and destinations of development trips be clearly presented, including the routes used by vehicles making these journeys. Typically ‘Travel to Work’ census data (2011) is an approach accepted by the Agency, and this has also been used by other recent planning applications within Chippenham. Trip distribution / assignment information is requested and this will enable the Agency to determine the severity of development trips impacting on the SRN during the sensitive weekday peak hours.

Traffic modelling
The Agency has considered its preference in how the proposals should proceed in determining its traffic impact on the SRN, with the primary concern being M4 Junction 17. Preference would be for the use of the Agency’ S-Paramics model, which includes greater detail for junctions with the SRN. This model was used to evaluate Core Strategy impacts and includes a more recent base year than the Wiltshire S-Paramics model. For the Rowden Park proposals, which are likely to generate a number of strategic trip movements, it will not be acceptable to use a Junctions 8 model.
This Agency model would still however require a review and some updating, before it would be deemed adequate for use with your proposals. This approach is consistently being applied to other live and future planning application within Chippenham, shown to have a sizable impact on the SRN.

As previously discussed, the Wiltshire S-Params model shows M4 Junction 17 to be positioned on the perimeter of the modelled network, with Chippenham town centre being its focus. The Land North of Chippenham was a site identified for allocation within the emerging Local Plan, which has since been adopted, and was considered by the Agency at a time when the Wiltshire model was still 'current'. This model was last validated in 2010 and includes surveys undertaken before this period. Hence we now feel the Agency model is more suitable.

It is apparent from a review of the PBA note that the modelling scenarios identified do not comply with the Circular, which requires an initial opening year impact assessment. This was also raised as a requirement in the Agency advice provided on 28th January 2015. In terms of capacity, Circular 02/2013 requires two assessment scenarios to be considered. The first is an opening year assessment. This assessment must include traffic associated with the FULL development proposals, taking account of background traffic (TEMPRO NTEM), the potential for any trip netting associated with an extant land use and committed development traffic. The opening year test will determine whether the impact of the development on the SRN would be severe and if mitigating measures are warranted. A further opening year assessment which includes mitigation measures may also be necessary in order to demonstrate the suitability of the measures in rendering the development acceptable. There is also a requirement to test a future horizon period of 10 years following the registration of the planning application, or the end of the relevant local plan review period, whichever is greater.

Comments included in the TA make reference to the A350 and other local highway authority junction improvements to be provided as part of the Rowden Park proposals. The TA also references the Rowden Park and / or other committed developments delivering or contributing to further highway network improvement schemes, which may or may not come forward. Clarification is requested on these.

It will be required for the applicant to confirm details on the status and timescales of the various local highway authority infrastructure schemes, in that the Agency can determine which traffic scenarios would be appropriate for determining traffic impacts on the SRN. Within the TA, the traffic scenarios show relatively large differences in the volume of traffic traveling through M4 Junction 17, as a result of mitigation schemes, and therefore it is important that the Agency understands these schemes and the effect on traffic.

It may be required that Grampian planning conditions are required for consideration of highway improvement schemes reliant on third-party developments, should these influence SRN junction performance. Further clarification is requested before the Agency can advise.

Travel Planning
A FTP has been provided by PBA setting out an overall transport strategy for the development site, in terms of measures considered likely to achieve a mode shift from car trips, and a programme for the Travel Plans implementation, management and monitoring. The FTP suggests a full Travel Plan (TP) will be provided for both the residential proposals and the school, and this will form a planning condition on any consent granted.

The proposals are believed to be providing reasonable provision for pedestrian and cyclist movements, with a series of connections planned to the existing surrounding areas. As such, trips made to immediate destinations are believed to benefit from this infrastructure provision. Further marketing and information dissemination measures are also planned for site occupants, highlighting walk / cycle routes and the proximity of local amenities. The Agency is of the belief that these measures will benefit local journeys
and therefore has accepted the internal trip percentages specified in the TA, associated with the local centre and primary school.

In considering more strategic trips, the FTP only discusses the 'possibility of options' for improvements and enhancements to public transport, but is unable to offer a guarantee that bus operators would be prepared to divert their services through the development site. With the majority of the site likely to be over 3km from Chippenham Railway Station, TP measures influencing more strategic journeys are considered to be more limited. This is a concern for traffic impacts on the SRN.

The FTP sets out initial mode shift target (from car to other modes) at 7% and this discount in car trips has already been applied to the trip generation results presented in the TA. The Agency's consideration of traffic impacts associated with the proposals on the SRN, therefore relies on this target being achieved, otherwise there is the risk of higher traffic volumes being generated.

A Travel Plan Coordinator (TPC) is to be appointed and be reasonable for the implementation and monitoring of the TP. The TPC will be appointed prior to the first phase of the proposed development and remain until the TPs formal monitoring period is completed. This is identified to be for a period of 5 years, extending to 7 if mode shift targets are not achieved by year 5. Mode shift targets and measures will be discussed and agreed with Wiltshire Council throughout the TP process.

The proposals are considered to present a number of TP measures that have the ability to be modified and amended in relation to site travel demands. Monitoring will occur over a minimum of 5 years and Wiltshire Council will ensure mode shift targets are met, or require further measures to be implemented for an extended 7 year period. Given the flexibility of the TP to amend measures needed to achieve its mode shift targets, the Agency is able to accept the 7% mode shift target is achievable and that the FTP is acceptable for an Outline Planning Application submission. A strong push towards public transport is believed to be the key for achieving a successful reduction in car trips.

**Summary**

Until such time as all of the above information is provided to address outstanding concerns, the Agency's holding direction will need to remain in effect.

I trust the above is clear. Should you wish to discuss the issues of this letter or feel that a meeting with the Agency would better able you to present your case in progressing the planning application, please do not hesitate to contact me.

Yours sincerely,


Rachel Sandy

Network Planning Manager
Network Delivery & Development South West – Growth & Improvement Team
Email: Rachel.Sandy@highways.gsi.gov.uk

cc: Miles Hodgson, CH2M Hill