

17/03417/OUT

Outline Planning for the Erection of up to 1,000,000 sq ft of Class B8 (storage and distribution) Employment Space and Associated Infrastructure

Land South-East of Junction 17 of M4 Motorway Kington Langley Chippenham Wiltshire

Highways Consultation Response

This application will have material impacts on the immediate local road network owing to the scale of the development.

The TA has been prepared in accordance with a scope of works agreed by both Highways England (in relation to impacts on the SRN), and by Wiltshire Council as LHA.

The principal issues of concern in relation to this application are considered to be:

Impacts at M4 J17
Impacts on A350 to the south of the M4
Use by site traffic of the B4122 and B4069
Site access arrangements.
Site sustainability

Impacts at M4 J17

The TA assumes that a significant proportion of HGV traffic associated with the site will consist of trips to and from the M4 motorway; the assumptions in this regard are considered to be reasonable, but the high percentage of movement suggests that any over-estimate in this regard has the effect of underestimating the impacts on eg A350. It is considered that the TA should have included 'sensitivity' testing on a scenario which assumes a 75% M4/A429 use and 20/5% A350/A429 use by HGV traffic.

Drg SK07B indicates in concept form some mitigation works to the A350 and the B4122 approaches to the roundabout, and to widen the south side of the junction to provide three circulatory lanes, together with signals controls at each of these two road junctions. It has not been demonstrated that the lanes indicated are of acceptable width to allow HGV passage on all lanes. Tracking for side-by-side HGV traffic should demonstrate adequate side clearance between vehicles.

The TA analysis of the M4 junction forecasts significant and unacceptable queues, especially on the A429, even with this mitigation, and the proposals cannot be considered to be a satisfactory.

The LHA will work closely with Highways England to ensure that mitigation to the M4 J17 works for both mainline and side roads, and that a nil detriment (or better) solution is delivered.

Impacts on A350 to the south of the M4

The TA states at 6.6.7: *In order to determine the distribution of the vehicle trips associated with the operational aspect of the proposed development, reference has been made to*

economic analysis undertaken in support of the proposed development to allow informed assumptions to be made. Detailed discussions with an industrial land agent who has a significant amount of local knowledge have also been undertaken and have indicated that the vast majority of the operational traffic associated with the development would travel via the M4, with only 10% utilising the A350 corridor to access destinations to the south and south east of Chippenham

It is considered to be inappropriate to rely on the view of a single industrial land agent to reflect on the impact of operational traffic on the A350, which serves all points to Poole. It is my view that a sensitivity test should be applied to that class of traffic, assuming up to 20% on A350 south, 5% A429 north.

The A350 test results, as stated at 6.7.27, remain to be submitted for consideration.

It would be helpful if the Figures in the Fig 6 series could be presented in a more readily readable form, and better represent the form of the road network, with arrow markings more accurately representing the direction of junction arms. The A350 appears to be incorrectly labelled at the Malmesbury road junction. There appears to be no information at The Plough junction, which is a significant local junction, but where it is accepted there might be no employee turning movements; nevertheless, its inclusion on the network diagram would help with interpretation.

Use by site of the B4122 and B4069

The TA forecasts that HGV trips will use the B4122 to access the M4 J17 roundabout, with no HGVs to the east of the site access.

It appears that, even accounting for HGV traffic, there is adequate link capacity on the B4122 for the level of traffic forecast.

The approved development for the North Chippenham site provides for a new link road between the B4069 (Parsonage Way) and the A350 (Malmesbury Road roundabout). This new link road will provide an opportunity to place legal restrictions on the use of the B4122 and B4069 by HGV traffic, except for access to load and unload. The programme for the delivery/completion of this new link road is likely to be within the next 4 years or so.

The B4122 is not a suitable road to allow any additional lorry traffic associated with the subject site south of the 'Pitstop' site access. The developer will be expected to fully fund and implement a TRO, in effect to complement the existing TRO recently implemented through Sutton Benger.

It is also a concern that the carriageway of the B4122 between the site access and the M4 J17 might be of inadequate structural strength to accommodate the forecast number of 'standard axles' for a reasonable future period. The LHA will therefore require, as a prerequisite to any planning permission, an undertaking to enter into an agreement under the provisions of s59 Highways Act 1980, to carry out a full structural pavement survey and to reconstruct any part of the road forecast to not have an appropriate residual life, with development lorries taken into account.

The B4122 will be used by a significant additional number of staff vehicles gaining access from the existing and allocated housing areas of the town served by the B4069. In this regard it will be necessary to undertake alterations to the junction layout at the B4122/B4069 junction so that priorities better reflect the nature of traffic movements, and to address concerns about the potential for personal injury collisions at this location; this should be undertaken at an agreed trigger point of the development.

Site access arrangements

The site access is proposed by way of a 50m ICD 4-arm roundabout. The general arrangement of this roundabout appears to be satisfactory insofar as its general compliance with DfT TD16 geometric plan requirements (although exit arm two lane and merge proposal remains to be explained), and the analysis of the junction indicates that capacity of the roundabout would be adequate to accommodate forecast use by traffic.

However, the applicant's agents were, at pre-application stage, advised that the interaction between the site access and the nearby HRC site to the east needed to be addressed. There is a known issue of the HRC site operating above capacity on frequent occasions, resulting in significant queuing traffic on the B4122 to the west of the HRC access. This queue-back traffic would result in unacceptable condition by the introduction of a busy roundabout junction at this location, unless the HRC issue can be resolved.

This issue is a material safety concern and the application should not be approved unless or until a satisfactory resolution to the problem has been identified. One possibility might be to consider, by agreement with WC/Hills, relocation of the HRC site onto the north side site (outside the application, but understood to be within the control of the applicant), using the roundabout for access. WC (Waste) have advised that they would be open to discussing the potential for this type of mitigation.

It is noted that the roundabout is proposed to host a large surface water storage structure (300m³ capacity) to attenuate flows to the watercourse within the south side site within the central area; consideration will need to be given to the maintenance implications of such a feature, including any impacts on normal grass maintenance of the roundabout. If this structure is intended to deal with any surface water arising from beyond the essential boundaries of the s278 works, it will not be an acceptable structure to house within highway land.

The proposals include a 1.2m wide footway between the site and the Pitstop site. Whilst this is welcomed, to accommodate undoubted potential demand, a path of this width should be set back from the carriageway to avoid safety risks to users on this section of the road where many heavy lorries gain access to the Pitstop facilities.

Site sustainability

It is acknowledged in the TA that the site is poorly served by public transport. There is little residential development nearby, and it can reasonably be concluded that, as a result of the facilities on the surrounding road network that cycling and walking trips to the site will be minimal.

The TA suggests the provision for a short period of a shuttle bus to serve the site. Comments on this are made under the sub-heading 'Travel Plan' below.

Further information on the proposed operation of a shuttle bus is required, showing how it might be funded, sample timed route (e.g. Speedy Route) maps, timetable, cost to users etc.

Construction Traffic Management Plan

I am not satisfied that the CTMP is sufficiently robust to ensure that, were to be used in conjunction with a condition, the B4122 would adequately be protected from potential

detritus deposits from the site, or that the routing arrangements would suitably be enforced (a contractual arrangement with suppliers should be a requirement). The location and arrangements for deliveries during roundabout construction should be shown on a drawing attached to the CTMP, and any use of existing (field) accesses would not be acceptable as temporary compound access without details of internal temporary road construction arrangements being clearly spelt out.

Design and Access statement

Supporting Statement 02 of the DAS says '*The transport impacts are confined to modest increases in queues and delays at some existing junctions, which will be mitigated by travel planning for the whole site, to maximise use of sustainable means of travel and hence reduce car usage. In addition the short term impact from construction traffic will be mitigated by a Construction Management Plan*'

It is not agreed that the DAS statement is correct or acceptable in these matters. Junction mitigation works should not assume that any travel plan provisions will be successful; the TA already assumes a degree of travel by shuttle bus, and trip rate comparator site, The Triangle at Swindon, is better provided for than this site in terms of access to public transport (Highworth Road and Kingsdown Road)

Supporting Statement 04 of the DAS is considered to reflect only generic TP issues and poorly reflects the obvious problems of pedestrian and cycle access to the site, and the lack of available public transport capable of sensibly servicing the site.

Travel Plan

The submitted FTP adequately summarises the poor transport sustainability credentials for the site, with the obvious exception of the proximity of M4 J17 for use by lorry traffic to and from the site.

The FTP suggests that trip modes associated with the Darlington Argos RDC might be used to reflect modal split. However, the Darlington site lies adjacent a residential area where reasonable bus, cycle and pedestrian facilities exist. It is highly unlikely that the Chippenham site modal split would in any sense be reflected by the TRICS Darlington comparator. Car mode will be significantly higher at the Chippenham site.

A shuttle bus is proposed, but detail is too sketchy. It is implied that a shuttle bus might be subsidised for three years, when its use will be 'deemed' to be useful or not. It is likely, given the location of the site, that bus support will be required in perpetuity. It is anticipated that many of the staff at the facility would be locally based, and Chippenham (and some surrounding villages) based staff could materially benefit from the use of a subsidised site bus

Para 4.4.3 suggests seeking the bus operator to subsidise employee ticket costs; the outcome for a subsidised service can be anticipated. The developer should be expected to meet costs of subsidies and any other financial inducements to achieve a more sustainable mode share.

Car sharing is likely to be a material potential contributor to the reduction of single occupancy car trips to the site. Car sharing and shuttle bus provision should be the focus of an eventual travel plan if the site is permitted.

I'll respond further when identified issues have been addressed.

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