PL/2026/04823 – LAND AT FOREST FARM
DRAFT PARISH COUNCIL RESPONSE

Derry Hill and Studley Parish Council objects to the outline planning application for the development of 600 homes and a local centre on land at Forest Farm (PL/2026/04823).

The basis of our objection is as follows:

TRAFFIC IMPACT

Derry Hill and Studley Parish Council contends that

1. The application is not supported by an adequate transport assessment.
2. The Transport Assessment provided by the Developer nevertheless still predicts unacceptable impact on the local road network with inadequate mitigation.
3. There has been no consideration of the impact of additional traffic on severance to communities along the A4 to the south and east of the development.

Policy Context

The National Planning Policy Framework (NPPF) Policy TR6-2 requires 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. This applies both during the construction phase and following completion."*

Wiltshire Core Strategy (WCS) Policy 62 requires that "*Developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages."*

Adequacy of the Transport Assessment

<u>Cumulative Impact of Developments</u>

Part of the justification put forward by the Developer is that:

> *"The application site formed part of the proposed South Chippenham allocation (Policy 7) within the Local Plan Review. This allocation was intended to deliver around 2,525, together with employment land, local centres, primary schools, nursery provision, and a new Southern Distributor Road. Within the wider allocation, the application site was expected to deliver approximately 600 homes and a local centre."* (Ref Planning Statement 1.8.)

Section 6 of the Transport Assessment models the baseline traffic flow, plus committed developments around Chippenham, plus the 600 houses proposed in this application.

Section 7 of the Transport Assessment then considers the cumulative impact of the above, plus:

- 400 new homes and a local centre on Land East of Showell Farm (submitted under PL/2026/03545).
- 500 new homes and a two-form primary school on Land to the South of Pewsham Way, immediately to the west of the Forest Farm site (not yet submitted, but included in the pre-application consultation).

The Transport Assessment has not fully considered the remaining 1,425 homes included in the South Chippenham allocation (Policy 7), so it has not considered the future state following the full rollout of the allocation. (Note, the Land East of Showell Farm was put forward as Employment Land in the Policy 7 Masterplan, so we assume that the development of the remainder of the site would deliver a further 1,425 homes, in addition to the 1,100 considered in Section 7 of the Transport Assessment.)

Neither has the Transport Assessment considered the recent planning approval of a further 150 homes on Land South of Stanley Lane, under PL/2023/08640, which is in close proximity to this development and will add to the pressure on the local road network.

We therefore contend that the Transport Assessment has not fully considered the cumulative impact of future development to the south of Chippenham and the associated impact on the local road network. This is a significant issues as Wiltshire Council will need to ensure that all developments in this area make an appropriate contribution towards any necessary improvements to infrastructure.

Trip Distribution and Assignment

Table 5.2 predicts that this development will generate an additional 226 car journeys during the morning peak hour and an additional 200 journeys during the evening peak hour:

Table 5.2: Total Trips by Mode – All Journey Purposes

Travel Mode	Morning Peak Hour (0800-0900)			Evening Peak Hour (1700-1800)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Walk	29	119	149	65	29	94
Cycle	3	11	13	8	3	11
Car Driver	45	181	226	138	62	200
Car Passenger	25	100	125	74	33	107
Bus/Coach	5	21	27	12	5	17
Rail	2	9	11	5	2	7
Total	**109**	**442**	**551**	**301**	**135**	**436**

This traffic forecast is then distributed using the modelling of journey purposes detailed in Appendix I. These detail the distribution of journeys for varying purposes, including:

> Education – destinations excluded include the very local Derry Hill Primary School, as well as Kingsbury Green Academy, Springfield School and St Mary's School in Calne. and Silverwood School in Rowde.

Education	%	Distance (km)	Route
Higher Education	*50%*		
Abbeyfield School	72%	1.3	
Hardenhuish School	13%	7	
Sheldon School	14%	6.6	
Primary Education	*50%*		
Charter Primary School	36%	2.7	
Kings Lodge Community School	42%	2.3	
St Mary's Catholic Primary	22%	4.3	

Retail – destinations excluded include the nearest Post Office at Derry Hill, as well as the market towns of Calne, Marlborough and Devizes.

Retail	%	Distance (km)	Route	
Food	*50%*			
Tesco Express	25%	1.7		
Lidl	14%	3.2		
Tesco Superstore	15%	2.9		
Iceland	16%	2.7		
Little Waitrose	10%	4.3		
Aldi	8%	5.7		
M&S Foodhall	6%	6.8		
Sainsbury's	6%	7		
Non-Food	*50%*			
Bath Road Retail Park	13%	6.8		
Chippenham Retail Park	13%	6.7		
Chippenham Town Centre	34%	2.6		
Bath	17%	25.8	I	
Bristol	9%	49	75% - A	25% M
Swindon	14%	32.5	50% - B	50% - E

Leisure/Other – again, Calne, Marlborough and Devizes have been excluded as potential destinations.

Leisure/Other	%	Distance (km)	Route	
Chipppenham Town Centre	41%	2.6		
Bath	21%	25.8	I	
Bristol	11%	49	75% - A	25% M
Swindon	16%	32.5	50% - B	50% - E
Melksham	7%	14.5		
Trowbridge	4%	24.8	H	

Table 6.12 then summarises the impact of the predicted flow on key junctions:

Table 6.12: Development Traffic Impact

Junction	AM Peak Flow (Two-Way)			PM Peak Flow (Two-Way)		
	2029 Baseline	Dev. Traffic Flow	% Impact	2029 Baseline	Dev. Traffic Flow	% Impact
Bridge Centre Gyratory	3,198	122	3.8%	3,632	104	2.8%
A4 Avenue La Fleche / Gladstone Road	2,464	122	4.9%	2,936	104	3.5%
A4 Avenue La Fleche / A4 Pewsham Way	2,210	122	5.5%	2,499	104	4.1%
A4 London Road / A4 Pewsham Way	2,341	179	7.6%	1,974	165	8.3%
A4 London Road / Old Derry Hill	2,294	36	1.5%	1,974	33	1.6%

The impact of the development on the junction of the A4 with the A342 at Old Derry Hill is then estimated at just +1.5% am and +1.6% pm, at just +36 and +33 vehicle movements respectively.

We therefore contend that the traffic impact on local roads to the south and east of the development have been significantly under-estimated by the process of Trip Distribution and Assignment used, which has excluded destinations in Derry Hill, Calne, Marlborough, Devizes and elsewhere from consideration.

Impact on A4/A342 Junction

The modelled impact on the junction of the A4 London Road and the A342 Devizes Road is summarised on p55 of the Transport Assessment in Section 6, modelling the scenario of 2029 Base + Committed + Development traffic flows:

A4 London Road / Old Derry Hill

Table 6.17: Old Derry Hill / London Road (West) – 2029 Future Year Assessment

Approach Arm	2029 Base + Committed				2029 Base + Committed + Development			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	Max RFC	Max Q (Veh)	Max RFC	Max Q (Veh)	Max RFC	Max Q (Veh)	Max RFC	Max Q (Veh)
Old Derry Hill (Left Slip)	0.62	2	0.50	1	0.62	2	0.50	1
A4 London Road	0.60	2	0.44	1	0.60	2	0.44	1

RFC = Ratio of Flow to Capacity Max Q = maximum average queue

Table 6.18: Old Derry Hill / London Road (East) – 2029 Future Year Assessment

Approach Arm	2029 Base + Committed				2029 Base + Committed + Development			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	Max RFC	Max Q (Veh)	Max RFC	Max Q (Veh)	Max RFC	Max Q (Veh)	Max RFC	Max Q (Veh)
Old Derry Hill (Right Turn)	0.33	1	0.25	0	0.33	1	0.25	0
A4 London Road	0.00	0	0.00	0	0.00	0	0.00	0

RFC = Ratio of Flow to Capacity Max Q = maximum average queue

The modelling of this junction is again summarised on page 65 in Section 7, modelling the scenario of 2036 Base + Committed + Cumulative traffic flows:

A4 London Road / Old Derry Hill

Table 7.7: Old Derry Hill / London Road (West) – 2036 Cumulative Future Year Assessment

Approach Arm	2036 Base + Committed				2036 Base + Committed + Cumulative			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	Max RFC	Max Q (Veh)	Max RFC	Max Q (Veh)	Max RFC	Max Q (Veh)	Max RFC	Max Q (Veh)
Old Derry Hill (Left Slip)	0.64	2	0.51	1	0.65	2	0.52	1
A4 London Road	0.62	2	0.47	1	0.65	2	0.48	1

RFC = Ratio of Flow to Capacity Max Q = maximum average queue

Table 6.18: Old Derry Hill / London Road (East) – 2036 Cumulative Future Year Assessment

Approach Arm	2029 Base + Committed				2029 Base + Committed + Cumulative			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	Max RFC	Max Q (Veh)	Max RFC	Max Q (Veh)	Max RFC	Max Q (Veh)	Max RFC	Max Q (Veh)
Old Derry Hill (Right Turn)	0.36	1	0.27	0	0.38	0	0.27	0
A4 London Road	0.00	0	0.00	0	0.00	0	0.00	0

RFC = Ratio of Flow to Capacity Max Q = maximum average queue

In both cases, the Ratio of Flow to Capacity for the London Road (eastbound) is shown as 0.00. While the perception of local residents may often be subjective, we would contend that the eastbound traffic flow at this junction during peak hours is well in excess of zero, and that therefore the modelling of this junction is unsound.

The modelling of this junction is therefore unsound.

Impact on Other Junctions to the east of the development

Studley Crossroads is a staggered uncontrolled crossroads on the A4 at Derry Hill. During busy periods, vehicles seeking to join the A4 from the local roads already face queuing and long delays.

This is demonstrated by previous evidence provided in support of planning application 15/10457/OUT (Land at Former Blounts Court Nursery), which is now known as Studley Gardens. The Transport Statement Addendum (April 2016) predicts a 2021 Ration of Flow to Capacity (RFC) of 1.21 during the morning peak, with average delays of 499s.

This junction is already over-capacity, which will be made worse by the additional traffic generated by the developments south of Chippenham.

The A4 through Calne also suffers from congestion during peak hours, particularly at the crossroads by the Town Hall and at the junction with Silver Street (A3102).

Wiltshire Council's own Transport Evidence Base (May 2023), which was prepared in support of the Local Plan Review, identified that growth from the Local Plan "*is likely to increase volume / capacity (V/C) above 85% or exacerbate links with high V/C on the A4 London Road through Calne*". (https://www.wiltshire.gov.uk/media/12036/Wiltshire-Local-Plan-Review-Transport-Evidence-Base/pdf/Wiltshire_Local_Plan_Review_Transport_evidence.pdf?m=638314186489270000.)

Without modelling of these key junctions to the east of the development, the Transport Assessment cannot be considered as having adequately assessed the impact of the proposed development on the local road network.

Impact on the Local Road Network

Notwithstanding the omissions in the modelling outlined above, the Transport Assessment nevertheless shows significant and unacceptable impacts on the local road network, particularly at the Bridge Centre Gyratory.

The modelling shows the Degree of Saturation on the A4 Bath Road approach arm increasing during the evening peak hour as follows:

Modelling Scenario	Degree of Saturation (%)	Mean Maximum Queue (Passenger Vehicle Units)	Reference
2024 Survey Assessment	77.0%	9	Table 6.5
2029 Base + Committed	86.8%	12	Table 6.13
2029 Base + Committed + Development	97.7%	22	Table 6.13
2036 Base + Committed + Cumulative	100.5%	36	Table 7.1

Comparing the 2024 survey assessment (Table 6.5) with the 2036 Base + Committed + Cumulative scenario (Table 7.1):

Approach Arm	2024 Survey Assessment				2036 Base + Committed + Cumulative			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	DoS (%)	MMQ (PCUs)	DoS (%)	MMQ (PCUs)	DoS (%)	MMQ (PCUs)	DoS (%)	MMQ (PCUs)
A420 Ivy Lane	67.0%	6	83.9%	8	84.7%	10	98.6%	21
Bath Road Car Park	1.4%	0	13.4%	0	2.3%	0	20.4%	1
Bath Road	57.8%	2	79.3%	6	62.4%	3	102.3%	20
A4 Avenue La Fleche	42.2%	4	40.6%	4	62.6%	8	64.5%	8
	56.6%	3	57.6%	3	69.4%	6	75.8%	8
A4 Bath Road	75.9%	9	77.0%	9	93.5%	16	100.5%	36
Ivy Road	2.7%	0	2.5%	0	2.9%	0	2.6%	0
Bridge Centre Car Park	0.0%	0	0.0%	0	0.0%	0	0.0%	0

Although the mitigation put forward in Image 7.1 does have some effect on mitigating delay on the A4 Bath Road Arm, it slightly worsens others and has a catastrophic effect on the Ivy Lane arm.

Conclusion

In conclusion, Derry Hill and Studley Parish Council contends that:

1. The Transport Assessment is not fit for purpose as:
    a. The cumulative impact of development scenario doesn't model the full development of the South Chippenham allocation set out in Policy 7 of the Local Plan Review.
    b. The trip distribution and assignment is skewed away from destinations to the south and east of the development.
    c. The analysis of the A4/A342 junction at Old Derry Hill is unsound.
    d. No analysis has been made of other key junctions on the A4 including Studley Crossroads and the Town Hall and Silver Street junctions in Calne.

2. Notwithstanding the omissions in the modelling outlined above, the Transport Assessment nevertheless shows significant and unacceptable impacts on the local road network, particularly at the Bridge Centre Gyratory.

These issues can be addressed by addressing the shortcomings of the Transport Assessment and contributions towards improvements to the local road network to mitigate impacts.

Impact of additional traffic on community severance

We note and support the provision of additional crossing points on the A4 London Road and Pewsham Way put forward in the application, including:

- Toucan crossing on the A4 Pewsham Way to provide a safe route between the development and the centre of the Pewsham Estate.
- Controlled crossing on the A4 Pewsham Way to provide a safe route between the development and the London Road.
- Toucan crossing on the A4 London Road opposite Stanley Sport Ground, to provide a safe crossing point between bus stops.
- Uncontrolled pedestrian crossing across the western arm of the new roundabout on the A4 London Road.

No assessment has been made or mitigation put forward for pedestrians crossing the A4 London Road at locations to the south and east of the development, specifically:

- The historic settlement of Pewsham, which includes the Pewsham public house, a garage, the Forest Gate business park, bus stops, homes along the London Road and Old Derry Hill, local footpaths DHST80 and DHST86, and bridleway DHST81.
- The vicinity of Black Dog, which includes the Black Dog public house/restaurant, the Bowood Sports Ground, homes along the A4 and Old Road, bus stops and footpaths DHST3 and DHST71.

We contend that the additional traffic generated will make crossing the A4 at these locations harder and more hazardous and will therefore deter pedestrians (residents, visitors and employees) from using public transport.

WILTS & BERKS CANAL

The Parish Council wishes to place on record its strong support for the restoration of the Wilts & Berks Canal and our disappointment that the development has not taken the opportunity to make the canal an integral part of the proposed estate.

Policy Context

Wiltshire Core Strategy (WCS) Policy 53 (Wiltshire's canals) states that:

> *"The restoration and reconstruction of the Wilts and Berks and Thames and Severn canals as navigable waterways is supported in principle. The historic alignments of the Wilts and Berks, including the North Wilts Branch, and Thames and Severn Canals, as identified on the policies map, will be safeguarded with a view to their long-term re-establishment as navigable waterways.*
>
> *"These alignments will be safeguarded by:*
>
> *i. not permitting development likely to destroy the canal alignment or its associated structures, or likely to make restoration more difficult*
> *ii. ensuring that where the canal is affected by development, the alignment is protected or an alternative alignment is provided.*
>
> *"Proposals will be permitted that are designed to develop the canal's recreational and nature conservation potential, in particular, the use of the old line of the canal for walking, cycling and interpretation."*

Integration of Canal Restoration into the Development

The Council considers that the Wilts & Berks Canal should be treated as part of the infrastructure of the proposed development, rather than simply as a landscape or environmental feature. The restoration and integration of the canal would provide significant benefits to both existing and future residents, including attractive access to green and blue infrastructure, opportunities for walking, cycling and other forms of active travel, improved biodiversity, heritage and recreational benefits, and an important contribution to the character and identity of the new community.

The canal and its towpath have the potential to form a high-quality, traffic-free route through and beyond the development, connecting residents directly with the surrounding countryside and the wider network of walking and cycling routes. The Parish Council considers that these benefits should be designed into the development from the outset and appropriately secured through the planning process.

In particular, the Parish Council strongly supports the Wilts & Berks Canal Trust's proposal to restore the canal from Pewsham Top Lock to the A4. The development should make provision for this restoration, including the necessary land, structures and infrastructure, so that the canal and towpath can form a continuous active travel corridor.

The Council's particular aspiration is that the restored towpath should ultimately provide an attractive and accessible active travel route all the way from Reybridge Lane to the National Cycle Route 403 at Studley Bridge. This would create a significant strategic walking and cycling

connection, linking the new development with existing communities, the surrounding countryside and the wider cycle and rights-of-way network.

The Parish Council therefore considers that the proposed development should:

- safeguard the route and land required for the future restoration of the Wilts & Berks Canal;
- incorporate the canal and towpath as a fundamental element of the estate's green and blue infrastructure;
- provide convenient and attractive access from the new homes to the canal and towpath;
- support the Canal Trust's proposals for restoration from Pewsham Top Lock to the A4;
- ensure that the design of the new roundabout on the A4 and associated infrastructure does not prevent or prejudice future canal restoration;
- contribute, where appropriate, towards the delivery of the canal and associated towpath infrastructure; and
- facilitate the creation of a continuous active travel route from Reybridge Lane through to the National Cycle Route at Studley Bridge.

The Parish Council believes that integrating the canal into the development in this way would significantly enhance the quality and sustainability of the proposed estate. It would provide residents with immediate access to an important recreational, heritage and environmental asset while also delivering a valuable long-term active travel connection for the wider community.

The Council considers that the canal should be recognised as an integral component of the development's infrastructure and that appropriate planning obligations, financial contributions and conditions should be used to secure the land, connections and infrastructure necessary to enable its restoration and the associated towpath active travel route.

COMMUNITY INFRASTRUCTURE

Policy Context

Chippenham Neighbourhood Plan Policy CI1 Community Infrastructure states that:

> *"Proposals for all major residential development shall demonstrate how the community infrastructure needs of new residents, generated as a result of the scheme, can be fully met on site or nearby without placing additional pressure on existing community infrastructure.*
>
> *"Applicants will be expected to demonstrate that they have considered up to date local evidence of the need for community infrastructure so that new residents have access to safe, affordable and attractive venues and sites which cater for all age groups. Venues should be flexible and available to local groups to rent and use where possible.*
>
> *"Large scale major residential development will be expected to provide new community infrastructure on site. Where major residential development cannot accommodate on-site community infrastructure an appropriate financial contribution, based on individual site circumstances, will be provided towards off-site community infrastructure or public art provision*."

Guidelines for Local Centres are also set out in Section B of the Chippenham Design Guide (Annexe 1 of the Chippenham Neighbourhood Plan).

Healthcare Provision

There are significant constraints on GP Provision in Chippenham and Calne: surgeries are at capacity and are not able to take additional patients. There has been no significant investment in GP surgeries or the community hospital for over 10 years despite the current house building programme.

This is recognised in Planning for Chippenham (July 2023 - Planning_for_Chippenham_July2023.pdf) which recommended that "Financial contributions towards health provision will be required" as part of any Chippenham expansion.

We note that the application contains no proposals for a new GP Surgery, Dental Practice or Pharmacy.

The NHS and Integrated Care Board should be consulted to ensure that strategies to increase primary care provision within Chippenham are considered in the planning decision and appropriate provision made as part of the development or through a developer contribution.

Local Centre

Section 4.5 of the Planning Statement states that *"A local centre is proposed within the north-eastern part of the site, occupying approximately 0.11 hectares and providing flexibility for a range of commercial, community and service uses."* In Section 6.29 of the Planning Statement, the Local Centre is described as 0.3 hectares.

Section 6.30 states that *"Whilst the exact mix of uses will be determined at the RM stage, it is anticipated that these could include a convenience store, café, retail units and community or healthcare facilities."*

For comparison, the Local Centre for the existing Pewsham Estate is approximate 0.81 hectares.

We also contend that the Local Centre is situated at the periphery of the development, rather than at its heart, providing a strong and accessible focal point.

Neither the size or location or the Local Centre meet the requirements of the Chippenham Design Guide (p34) which state:

> *"B1. A local centre shall be provided at the heart of the development forming a focal point and strong identity for the development. It will be designed to encourage the community to meet, interact and facilitate activity, being a vibrant hub during the day and in the evening.*
>
> *"B2. The local centre shall be of a sufficient size to ensure that residents' day to day needs are met without the need to drive. It shall be accessible for all and located in accordance with the 15 Minute Neighbourhood."*

Allotments

We welcome the inclusion of allotments within the development. We note that these are located within the parish boundary of Derry Hill and Studley Parish Council and therefore ask that a condition be included in any decision to give equal weight to applications from Derry Hill and Studley residents as given to Chippenham residents.

OTHER ISSUES

Pre-Application Consultation

National Planning Policy Framework DM1 outlines the requirement for proportionate pre-application engagement with neighbours and the local community.

The pre-application engagement consisted of a website and online questionnaire. There was no public meeting or drop-in exhibition, negligible engagement with stakeholders and the online questionnaire allowed just over two weeks for responses.

Despite receiving 537 responses, the Developer has made no attempt to amend or adapt their proposals, with the application submitted within a few weeks of the consultation closure.

Building Height

Figure 7.4 of the Design and Access Statement sets out the maximum building heights proposed for the development. These are predominantly 2.5 to 3 storeys.

We recognise that these are maximum envelope and that it is important visually to avoid monotonous building elevations. Nevertheless, we note that two storeys is the norm in the nearby Pewsham estate and we consider that 2.5 storeys would be more appropriate as a maximum in a rural setting, with lower building heights forming the edge to the site.

We therefore ask that appropriate conditions on building height be part of any planning decision.

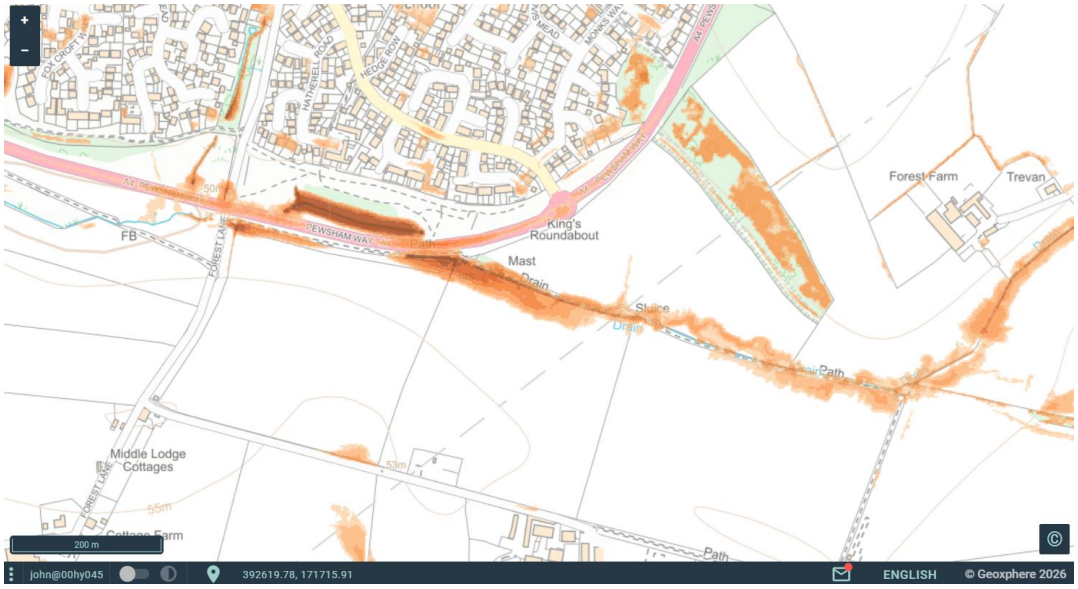
Drainage

The Flood Risk Assessment and Drainage Strategy is presented in Technical Appendix H of the Environmental Statement.

The Appendix identifies that significant parts of the site are at medium and high risk of surface water flooding. This reflects the low-lying nature, the high groundwater levels and underlying geology of the site.

The Appendix presents the drainage design based on attenuation ponds and a swale, with outfalls into the existing watercourse. From the site, this watercourse heads north-west, meeting and running alongside Pewsham Way, before heading west to join the River Avon near Chippenham Wastewater Treatment Works.

The Environment Agency's Surface Water Flood Mapping (1:30year) already identifies Pewsham Way as being at risk of surface water flooding from this watercourse:



Section 6.31 of Appendix H states that: *"In the event the capacity of the proposed surface water drainage network is exceeded, the excess water will follow the topography of the ground and flow overland into soft landscaping, greenfield land surrounding the site or towards the existing ditch network at an unrestricted rate, leaving properties unaffected."*

Given the existing issues with surface water flooding on the site, the high groundwater levels and the underlying geology, we consider that the SuDS drainage systems proposed are likely to become inundated during periods of prolonged rainfall events, reducing or negating the attenuation capacity. We therefore consider that there is a significant chance that the harder surfaces within the development will result in increased run-off entering the watercourse, resulting in increased surface water flooding along Pewsham Way.

We note that the modelling undertaken in support of the design has considered singular rainfall events only, rather than utilising stochastic modelling to test the performance of the design under more realistic time series rainfall event sequences. We also note that the modelling has assumed a free outfall into the watercourse during a 1:30 year storm (Ref Flood Risk Assessment and Drainage Strategy 6.45), which seems unlikely.

We therefore contend that the application does not demonstrate that the development will not result in increased flooding of Pewsham Way.

Finally, we consider it unfortunate that the Developer has not explored the integration of the site drainage with the restoration of the Wilts & Berks Canal, missing out on what might have been a win-win opportunity.

Air Quality

Wiltshire Core Strategy Policy 55 requires development proposals to *"demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity. Mitigation measures should demonstrate how they will make a positive contribution to the aims of the Air Quality Strategy for Wiltshire and where relevant, the Wiltshire Air Quality Action Plan."*

The Air Quality Assessment, included as Chapter 4 and Appendix C of the Environmental Statement, has considered the impact of the development on 38 receptors, from the A4 Bath Road through to the western edge of Calne.

The Air Quality Assessment reflects the shortcomings of the Traffic Impact modelling that we have set out above, viz:

- The cumulative impact of development scenario doesn't model the full development of the South Chippenham allocation set out in Policy 7 of the Local Plan Review.
- The trip distribution and assignment is skewed away from destinations to the south and east of the development.

In addition, the Air Quality Assessment does not extend into the most sensitive parts of the Calne Air Quality Management Area, covering New Road and London Road. This is one of only six Air Quality Management Areas in Wiltshire and should therefore be properly considered in the planning application.

CONCLUSION

As set out above, the basis for our objection to PL/2026/04823 is as follows:

1. Traffic Impact
    a. The application is not supported by an adequate transport assessment:
        i. The Transport Assessment has not fully considered the cumulative impact of future development to the south of Chippenham and the associated impact on the local road network.
        ii. The traffic impact on local roads to the south and east of the development have been significantly under-estimated by the process of Trip Distribution and Assignment used, which has excluded destinations in Derry Hill, Calne, Marlborough, Devizes and elsewhere from consideration.
        iii. The modelled impact on the junction of the A4 London Road and the A342 Devizes Road is unsound.
        iv. The Transport Assessment has not considered the impact on key junctions A4 to the south and east of the development, including Studley Crossroads (which is already operating above capacity) and through Calne.
    b. The Transport Assessment provided by the Developer nevertheless still predicts unacceptable impact on the local road network with inadequate mitigation.
    c. There has been no consideration of the impact of additional traffic on severance to communities along the A4 to the south and east of the development.

2. Wilts & Berks Canal. The canal restoration should be recognised as an integral component of the development's infrastructure. Appropriate planning obligations, financial contributions and conditions will be required to secure the land, connections and infrastructure necessary to enable its restoration and the associated towpath active travel route.

3. Community Infrastructure.
    a. Healthcare Provision. There are significant constraints on primary care provision in Chippenham and Calne. Appropriate provision should be made as part of the development or through a developer contribution.

   b. Local Centre. The size of the local centre proposed is inadequate and its location on the periphery of the development will detract from its purpose.
   c. Allotments. We welcome the inclusion of allotments within the development. As these are located within the parish of Derry Hill and Studley, we ask that a condition be included to give equal weight to applications from Derry Hill and Studley residents.

4. Other Issues.
   a. Pre-application Consultation. The public consultation was inadequate and the Developer has made no effort to accommodate feedback received into the application.
   b. Building Height. A maximum building height of 2.5 storeys would be more appropriate to a rural setting outside the edge of Chippenham.
   c. Drainage. The application does not adequately demonstrate that the development will not result in increased flooding of Pewsham Way.
   d. Air Quality. The Air Quality Assessment is subject to the same limitations as the Traffic Assessment. In addition, it does not extend into the most sensitive parts of the Calne Air Quality Management Area, covering New Road and London Road.

We would welcome the opportunity to discuss these issues further with the Planning Officer and/or the Developer.