MEMORANDUM

To:	**Development Management**	**From:**	**Sustainable Transport**
Ref:	**PL/2025/06749**	**Ref:**	**PL/2025/06749**
		Date:	**14 November 2025**

PL/2025/06749 - Land North of Bath Road (A365), Melksham - Outline planning application (with all matters except access reserved) for mixed use development comprising residential (up to 205 dwellings), land reserved for expansion of secondary school, public open space, landscaping and associated engineering works

Submissions reviewed:

- Application Form
- Design and Access Statement
- Transport Assessment
- Framework Travel Plan
- Site access Plan

Relevant Planning & Guidance

- National Planning Policy Framework
- Manual for Streets / Manual for Streets 2
- Wiltshire Core Strategy
- Wiltshire Local Plan Review

Introduction

This response will review matters relating to highway and transport issues. I note that this planning application is an outline application with all matters reserved; except 'access' matters that are to be determined at this outline stage.

Assessment of the proposal

Principle of development

This planning application site is an allocation in the Wiltshire Local Plan Review (Policy 19 – Land off Bath Road, Melksham). Due to the proximity of the site, close to the Wiltshire Core Strategy settlement framework boundary (that wraps around Melksham Oak Community School) and the fact that it forms part of the Wiltshire Local Plan, no highway objection relating to sustainable transport will be raised, subject to suitable mitigation measures as identified in the Local Plan policy and other guidance. This includes measures to improve active travel, public transport and infrastructure to ensure suitable and safe access.

The Local Plan allocation (Policy 19) enables a development of 135 dwellings, whilst I note that this planning application is for up to 205 dwellings. In highway and transport terms there is no issue with a higher provision of dwellings. In highway terms the larger scale of development will produce a greater number of trip movements, and this impact can be modelled and mitigated. Subject to suitable mitigation, safe access arrangements and measures for active travel and public transport.

Masterplan

I note the concept masterplan submitted. It does not provide detail relating to a road hierarchy. However, road hierarchy is a matter that can be considered at the reserved matters stage as part of Layout and Landscaping considerations.

Transport Assessment considerations

Trip Generation – Proposed multi modal residential trip rates

With regard to the TA, Table 6.1 outlines car total trip rates of AM 0.428 and PM of 0.416 in the peak hours. These trip rates for Wiltshire and in this edge of town location are considered extremely low. A trip rate for this type of location in Wiltshire is usually around 0.5 – 0.55, in both AM and PM. The existing rate utilised would result in a significant number of movements not being accounted for and input in the junction operation assessment modelling. As a result the trip rates must be increased for both the AM and PM peak hours.

High car dependency modal share

With regard to paragraph 5.6 of the TA, it is noted in the Census Data 2011 that the method of travel to work, outlines 79% by driving in car/van or passenger in a car/van. This clearly outlines the existing percentage of travelling by the car/van is high for this type of location.

With regard to the proposed trip generation, Table 6.2 outlines that in the AM peak, car travel of 88 movements (66%) of the total 133. With regard to Table 6.3 and the Vision Led trip generation outlines 79 movements (58%) in the AM. These percentages are between 15-20% below the current Census Date 2011 modal split for travel to work (79%) – clearly a significant decrease in car trips. This is target and modelled trip generation – it is simply too ambitious, for this edge of town location, without significant measures to encourage walking, cycling and public transport. Realistically, with only the Secondary School and Primary School located nearby, and other facilities and services, employment (see table 2.1) a significant distance from the site, higher level and mode share of car borne trips is likely. In combination, the proposal does not detail significant measures for public transport and walking and cycling upgrades in this vicinity to encourage the level of modal shift away from the car trips to the level that is suggested to be considered reasonably likely.

Framework Travel Plan

In combination with the above and car/van trips with regard to the Travel Plan, I note the provisional targets for modal split detailed in section 4 (table 4.1). These indicate a more realistic ten per cent target for car/ van share reduction across a 5 year period, from 75% to 65%. This contradicts the scenarios that have been modelled in the junction analysis in tables 6.2 and table 6.3 of the TA. Please amend accordingly.

There are overall objectives of the Travel Plan set out in section 2. Travel plan measures are set out in the section 6. These seem reasonable at this point. The Travel Plan will be subject to planning condition and further review closer to site construction and occupancy of the development.

Modelling Scenarios - Assessment years

Paragraph 7.9 of the TA outlines that as the application site is a Local Plan allocation, assessments have been undertaken for the end of the Local Plan period 2036 – But this is not correct, the end of the Local Plan period is 2038. Assessments will need to be updated and traffic growth applied accordingly.

Modelling scenarios – Wiltshire Transport Model

I note that the modelling scenarios do not include data from the Wiltshire Transport Model (Saturn model). Scenarios have been derived from base surveys and other committed development. It is considered that as this site is a Local Plan allocation, data from the Wiltshire Transport Model and Local Plan scenarios must be utilised.

With regard to paragraph 7.18, Local Plan allocation site traffic growth does not make up TEMPRO growth. TEMPRO growth covers sites up to 50 units or equivalent and significant development would also be covered in the Wiltshire Transport Model Uncertainty Log.

Junction Operation assessment analysis

Due to the above concerns relating to low trip generation, modelling scenario base not utilising the Wiltshire Traffic Model and time periods. It is considered that the junction operation analysis for the site junction, Bath Road roundabout, Spa Road roundabout must be re-run and remodelled. The Spa Road Roundabout (Table 8.3) is also showing issues with Western Way in terms of RFC and delay, in the PM period. It is considered that there are significant concerns that the modelling has utilised insufficient vehicle trip generation input into the models. A reasonable and agreed model input is required (i.e. WTM) to ascertain queue length, capacity and delay. The operational assessment analysis needs to be re-run for these junctions in order that the traffic impact can be assessed robustly.

With regard to the site access junction capacity analysis, with regard to Table 8.1. I note that Bath Road East and Bath Road West movements have been combined. This is not considered good practice to combine arms / movements. Due to the suggested remodelling above, please remodel arms separately and please do not combine movements.

Site junction - Junction selection – Roundabout required

There are a variety of factors that need to be taken into consideration when selection of a junction type to a classified I road is decided. The Local Highway Authority consider that the vehicle junction related to the application site from the A365 must take the form of a roundabout. This would be an upgrade from the proposed ghost right hand turn lane. This requirement is a balanced judgement and also considers a combination of factors. The reasons for the requirement of a roundabout include (but not limited):

- The number of likely vehicle movements related to this site
- The nature of traffic flow and vehicle speeds along the A365 Bath Road
- Existing issues related to traffic speeds and accident records along A365 Bath Road and the vicinity.
- The nearby junctions (The Melksham Oak School and Hornchurch Road) are served by the ghost priority junctions and suffer from issues of cars overtaking in the ghost right hand turn lane.

- A roundabout site junction in combination with a 3m footway/ cycleway to north of A365, a formal crossing, bus stops and gateway will significantly change the highway environment in this area. Primarily this will provide walking and cycling accessibility. But these facilities will also communicate to drivers that this is an urban area with housing and schools in this area.
- Not a key reason but a roundabout will future proof the site junction, in the event of further allocations that could be served off this site junction.

It is considered that the development will produce significant vehicle trip movements, and it is considered that in combination with existing traffic, speeds, road safety issues, proximity of the school it is considered reasonable to require that a compact roundabout is implemented as a result of this development.

On this basis, it considered that the developer must come forward with a revised junction roundabout design package to serve this site allocation. This will also include a 3m footway to north of A365 Bath Road, formal crossing, bus stop upgrades, gateway features and consideration of the Bowerhill Lane junction.

In accordance with DMRB CD 116. Paragraph 2.3.3 it is considered that a compact roundabout would be appropriate. The TA outlines that the traffic flow along the A365 Bath is around 9,500 vehicles - two way AADT on two of the three approaches. Very broadly, the development arm – 205 dwellings by 6 car trips average = is 1,230 car movements. No arm will exceed 12,000 AADT so a normal roundabout is not considered appropriate. A compact roundabout design should be provided.

It is considered that a roundabout similar to the compact roundabout implemented at Cricklade, on the B4553 at Hitchings/ south of Cricklade would be a good starting point from a design perspective. This roundabout would be a starting point for working up a design for a junction of this nature in this location.

Proposed Priority junction

Detailed layout and geometry comments relating to the amendment of the priority junction have been drafted. However due to the requirement to provide a roundabout it makes these comments superseded and of little relevance at this point. So are not provided at this point.

Bowerhill Lane junction

As part of implementation of a roundabout a revised design for the Bowerhill Lane junction must be provided. It is noted that there was an accident at this location. It is considered that the introduction of the roundabout and alteration to the road layout could improve these issues.

Roundabout junction operation assessment

As part of roundabout junction proposals, with the new trip generation, ARCADY junction operation assessment modelling of the roundabout will be required. With a roundabout proposal there will be no requirement to model the priority junction.

Walking and cycling – 3m footway on south side of A365 carriageway

The existing proposals include footway and cycleway provision on the south side of the A365. This is accessed via toucan crossing.

It is clearly not on the direct desire line towards the school and will result in users crossing the A365 on two occasions to access the school and the routes related towards Melksham. It is important to consider that key users will be school children associated with the school.

This has two key safety implications, first increased risk of users crossing the busy A365 twice. The second safety risk is users completely ignoring the crossing facilities and walking directly along the existing highway verge/layby and creating an unofficial natural route that is not designed for this purpose. Both of these scenarios are not acceptable to pedestrian and highway safety. An amended scheme must be provided.

Revised footway on north side of the A365 carriageway

The scheme must be revised to include the new 3m cycleway/ footway on the north side of the A365 between the site junction and across the full frontage of the Melksham Oak Community school site /junction. This will need to be LTN 1/20 compliant. This would link across to the existing toucan crossing near the Bath Road Roundabout and provide linkages into the school site.

Footway - Pinch Point

I note that there is a slight pinch point near the school entrance. The adjoining landowner is Wiltshire Council strategic land. I have raised the issue with the Strategic Property team whether a small slither of land could be dedicated as Public highway in order to provide public benefit and provide the footway / cycleway. Please work up a design and then the detailed extent of additional Public Highway required can be clearly calculated.

Footway - Remove layby

I also note that there is a layby in the vicinity of the proposed walkway/ footway. The Local Highway Authority is prepared to accept removal of the layby in order to provide walking and cycling connectivity via a footway/ cycleway. It is considered appropriate that the layby is removed in order a 3m footway/ cycleway can be provided across the site frontage. No traffic order required. Please provide amended details.

Bath Road A365 - Current overtaking and speeding issues

It is apparent that there are existing issues relating to overtaking in both directions on the ghost right hand turn lane relating to Hornchurch Road junction and the school site junction. I understand that a scheme is being developed in order to physically prevent this manoeuvre. This will involve a solid island being located at both ends of the ghost island RH turn lanes as vehicles approach the junctions. In any revised design this must be considered.

Swept Path analysis

I note the refuse tracking supplied. There are superseded draft comments relating to this. On the basis of a new roundabout junction additional swept path analysis will be required, including a fire tender tracking also required.

Visibility splays

I note that a visibility splay of 4.5m x 120m is outlined. This is appropriate for a road of this nature. Revised splays will be required for a revised roundabout design.

Accident data

Paragraph 2.34 – Please confirm exactly what the most recent five-year period dates has actually been supplied, I note 30/04/2020 – 30/04/2025 in appendix but please confirm.

There are significant number and cluster of accidents in vicinity of Bath Road roundabout, more analysis of this is required. Common themes and issues behind the accidents require analysis and should be set out.

Walking – Direct connectivity to the Secondary school

There appears to be little commentary and detail relating to the direct walking and cycling access to The Melksham Oak Community School from the application site. I note the illustrative plan outlines a purple arrow at the north of the site. This is a key issue how this is implemented and delivered.

This is an outline application with access matters to be determined at this stage. Therefore full details of this direct access with the school site should be provided at this stage. Details of how this will be LTN 1/20 compliant and how this be implemented and connected within the school site need to be provided and detailed. The aerial photography seems to indicate this will connect to a track within the school site. Upgrades or contributions will be required for this track. Therefore, full details of the access point within the application site and details of how the track within the site will require upgrading need to be outlined (i.e. contributions). Please provide this detail.

Passenger transport - Bus stop provision

The TA does appear to outline some detail of the extent of the upgrade to the bus stop (paragraph 4.13). I note that the site access plan outlines '*Existing bus stops to be enhanced with bus cage road markings and shelters*'. The full extent of the provisions are not set out.

RTPI units and displays (i.e. timetable information) will also be required (these are costed at a contribution of £8,000 per unit, so a contribution of £16,000), along with upgrades to surfacing, hardstanding, raised kerbs. This is in addition to bus shelter requirements. Bus shelters have been costed at contribution of £10,000 per shelter. With the implementation of a roundabout this will change the layout and geometry of the area in this vicinity. But these factors need to be considered in any re-design of the scheme. On this basis a passenger transport contribution is looking likely to be in region of:

- £16,000 - RTPI displays
- £20,000 - Bus shelters
- Physical works - Provided as part of the S278 scheme – Groundworks, Kerbing, and bus cage lining

Proposed speed limit extension and relocation

I note the proposed extension to the 30mph speed limit. I am satisfied with the location of the extension. The context is a number of buildings as vehicles head westbound towards the proposed site access, with bus stops and junctions.

I note the relocation of the speed limit and introduction of gateway feature. Please note a contribution will be required of £7,000 to cover amendment to the traffic regulation order.

Gateway feature

A narrowing of the carriageway on a primary route the Bath Road A365 is not acceptable and this needs to be removed from proposals. A gateway feature is appropriate, but the gateway should accord with the Wiltshire Council guidelines for gateway features. Please amend the gateway feature accordingly.

Road Safety Audit

The downloaded version of the Road Safety Audit (RSA) from the planning portal appears to remove details from RSA in Appendix C. Please supply a version with the RSA complete details. I reserve full comment on the RSA until this detail is received. As result of a roundabout proposal a revised RSA will be required.

Walking and Cycling contribution towards Melksham LCWIP

A contribution towards the Melksham Local Walking and Cycling Implementation Plan will be required. To encourage walking and cycling and contribute to planned infrastructure. These measures will help positively towards walking, cycling and public transport use between the site, town centre and railway station. This is in accordance Local Plan Policy 19. This will relate to Route 3 is 3-2 (The Spa to Bath Road/Falcon Way) which runs from the proposed development towards the town centre. The exact financial contribution will be confirmed in due course.

Emergency access

Considering the nature of the layout of the site, with a large percentage of the housing served of a loop road / network, this will provide opportunities for alternative access by emergency vehicles.

It also appears that that on the main route into the site this is accompanied by a 3m footway/ cycleway with open space adjacent. I consider that if there was a blockage at this point, emergency vehicles should be able to bypass the issue/ or it would actually be the issue to which emergency vehicles would be able to access.

The Suggested Way forward

The site junction is considered in a sensitive location in proximity of the school and between areas of housing with the A365 Bath Road in between. It is considered and strongly recommended that a new package of details should be submitted outlining the introduction a new roundabout junction, formal crossing, footway/ cycleway on the north side of the carriageway, bus stops and gateway feature. This infrastructure will positively contribute towards changing the road geometry and streetscene environment in this vicinity. With the benefit of improving the highway environment relating to speeds of traffic and improving the environment for walking and cycling and particularly relating to the trip movements related to the school. The connectivity between the development and crossing the A365 Bath Road with Bowerhill will be improved.

It is considered that the impact of this development can be suitably mitigated subject to a revised package of details. As detailed above there are a significant number of issues that the Local Highway Authority require amendment before support for the application can be provided. This site is an allocated site in the Local Plan, a solutions-based response has

been provided but details and design issues will still need to be worked through, including junction assessment and a revised package of details provided addressing the issues raised.