

**CALNE WITHOUT PARISH COUNCIL – RESPONSE TO FUTURE CHIPPENHAM CONSULTATION
ABOUT THE WILTSHIRE HOUSING INFRASTRUCTURE BID (HIF) AND POSSIBLE ROUTES
FOR A NEW DISTRIBUTOR ROAD**

DRAFT 4 – 24th February 2021

1. The following input is offered on behalf of Calne Without Parish Council to the consultation initiated on 15th January 2021 about the HIF bid and specifically the proposed route of a distributor road to the south and east of Chippenham.
2. These comments represent the views of the current Parish Council and could be subject to change following the election of a new Council in May 2021 and the emergence of further detail.
3. The requirement to provide comments by 12th March 2021, is a relatively short period of consultation for such significant and wide-ranging proposals with major implications for our area and residents. The very limited time and Covid restrictions has constrained our ability to consult widely within the Calne Without Parish community. This must therefore detract from the whole process and call into question the efficacy of the consultation process and the associated timetable.
4. The council notes that the questions posed by the consultation imply that the distributor road will be built and therefore already pre-judges the outcome of consultation on the matter, save the route, and the broader Local Plan consultation.
5. The Options Assessment Report (OAR) clearly states a strategic objective is delivery of housing alongside improved connectivity and to mitigate congestion. It is therefore disingenuous to suggest there is no link between provision of a distributor road and the draft Wiltshire Local Plan aimed at significant growth around Chippenham to meet, and exceed, Wiltshire Council's housing targets. The case for the road, without the housing is not made.
6. A response to the survey by Calne Without Parish Council should not be considered, or presented as, support for the distributor road plans or the associated housing developments as currently proposed.
7. Ahead of addressing the specific questions in the survey, the Council would offer the following general comments.
8. Aside from facilitating a house building programme, the stated strategic objectives of the Future Chippenham plan are to improve connectivity and reduce congestion. It might be argued that there would be no need for improved connectivity if the housing development did not proceed as planned. In terms of congestion new roads increase traffic does not decrease it. There is published evidence over a considerable period of time that demonstrates new roads create more traffic rather than reducing congestion. In 1994 the Standing Advisory Committee on Trunk Road Assessment showed that average traffic flow on 151 improved roads was 10.4% higher than

forecast and 16.4% higher than forecast on the 85 adjacent routes that the improvements had been intended to relieve. In a dozen more cases the increase in traffic ranged from 9% to 44% in the short run and 20% to 178% in the longer run. The conclusion was: "An average road improvement...will see an additional 10% of base traffic in the short term and 20% in the long term." This has been accepted by the Department of Transport. Furthermore, studies of bypasses such as that in Newbury have shown that reductions in town centre traffic levels were less than originally forecast and the subsequent regrowth in traffic levels on the bypassed roads and the new road resulted in a considerable overall increase in traffic.

9. Any claim by the Council that the distributor road will reduce congestion is wrong. As the consultation document makes clear, these houses will be marketed at people working along the M4 corridor and, as the stated aim of the road is to ease access to the M4, then it is obvious that the Council intends to increase traffic on this and surrounding roads as the resident's travel to their jobs, contrary to the Wiltshire Council Local Plan aim of reducing commuting and building houses close to employment. If any of the residents of the new houses wish to use the train to get to work then they will have to drive into Chippenham because many of these houses, especially in the south of the associated development, will be too far from the station to walk or cycle as a result congestion in the town centre and especially on Station Hill/Cocklebury Road will be made worse.
10. The argument that the road is needed to ease access to the M4 for current residents is spurious because the proposed road goes nowhere near the M4. The A350 is the main route to the M4 and the idea that anyone would wish to drive a circuit of Chippenham to reach it is fanciful, particularly as the road will not be designed as a quick route given the many links and spurs required for the associated housing developments.
11. There are many environmental concerns with the proposals that do not appear to have been adequately addressed ahead of launching the consultation. In fact, the Options Assessment Report (OAR) clearly states environmental case assessment does not include all mitigation of impact and only includes key elements such as reducing flood plain impacts (although the OAR acknowledges this has not been fully assessed) with mitigation for potential other impacts identified, only to be developed at the next stage of design. How can this be credible when the proposed routes and scale of development have such a significant impact?
12. Driving a large road through an environment which currently has underused country roads and, in the case of the southern section, has no roads at all and is open countryside, will have consequences for birds, mammals and insects. This road scheme will both destroy and fragment wildlife habitats by removing existing wildlife corridors; with no evident plans to address this. The annual Road Death report on animal fatalities shows that building large roads through a rural area has an effect on wildlife fatalities, with deer, owls, kestrels, hares and smaller mammals that live in arable, pasture and woodland being disproportionately affected. It goes on to say, 'Due to the impact of road casualties it has been suggested that barn owls are

unable to sustain viable breeding populations in close proximity to...roads.... and that road casualties may even be responsible for suppressing the populations of some of our common mammal species on a local scale’.

13. An increase in air pollution is an inevitable consequence of new roads. The UK has consistently failed to meet legally binding targets to reduce air pollution. On average transport is responsible for 80% of NOx emissions at the roadside. Air pollution poses critical threats to the health and well-being of residents. There are an estimated 23,500 UK deaths annually from nitrogen dioxide concentrations and exposure to small particulate matter pollution is estimated to result in nearly 29,000 deaths in the UK each year. A report by the Royal College of Physicians and the Royal College of Paediatrics and Child Health found that outdoor air pollution is linked to around 40,000 deaths a year and estimated that the impact on public health by this pollution costs the UK more than £20bn annually - 16% of the annual NHS budget. It found that air pollution plays a role in many chronic conditions such as cancer, asthma, heart disease, and neurological changes linked to dementia. It concluded that the concentration limits set by the government and the World Health Organisation are not safe for the whole population and leave certain groups vulnerable. The Council should not be seeking to increase pollution levels by building new roads and increasing road use.
14. As well as the CO2e emissions which this road will cause through the extra traffic it will generate, the construction of the road itself will generate emissions that will exacerbate global warming. Whilst this is difficult to calculate because it depends on the sources of power used in the extraction, import and manufacturing of the aggregates, all proposed routes require multiple flyovers which require more construction materials than a regular road. This project could result 200 tonnes of CO2e being put into the atmosphere before anyone drives on it.
15. The current environmental crisis is not just about global warming but is also about the catastrophic collapse of Britain’s bird, mammal and insect populations which will have wide-reaching consequences for food production and the wider environment. All roads are a barrier and hazard to wildlife and roads in the wrong places can destroy and fragment wildlife habitats, as well as harming landscapes that are important for their nature, geology, historical or aesthetic value. Noise and light pollution can also cause underestimated damage. Recently scientists have shown that noise pollution from roads diminishes birds’ ability to find food and that noise pollution.
16. In general, local residents do not support new roads. Opinion polls and surveys over recent years have consistently shown that most people prefer to improve public transport and, if money is to be spent on roads, they want it to be spent fixing potholes not adding new capacity. With the changes that have been wrought in working and commuting over the last year by Covid 19 the Council would be very ill judged to go ahead with this road scheme as, largely because of a rapid move to home working, fewer road journeys are being made and the public is highly supportive of expanding local transport options. A recently commissioned poll by

MPs shows that residents want more and better safe cycle lanes and bus services rather than major road building investment.

LOCAL ROADS AND WIDER IMPACT

17. Calne Without Parish Council is extremely concerned that the Future Chippenham consultation gives no information on the traffic implications for communities and roads to the east of the proposed distributor road and associated developments. The proposals for the road and up to 7500 houses will have much wider impact than the very limited area chosen for assessment and consultation and is a major omission that challenges the validity of the consultation.
18. A similar issue arose with the West Calne, Bevesbrook by-pass proposals in 2000 when a by-pass and major housing development was constructed with no analysis of the impact on nearby communities. The result was the creation of a major rat running problem through Derry Hill (Church Road) by northbound and southbound traffic on the A3102 seeking to avoid congestion in Calne. The route is wholly unsuitable as it is fronted by a primary school and has no continuous footway. Later traffic calming has been ineffective in preventing rat running and speeding. Traffic surveys in 2015 showed up to 65% of traffic was rat running. This continues to this day and has almost certainly worsened. It is vital that at this stage of consultations that full traffic implications of the road and housing are modelled and residents of communities on the west side of Calne made aware of the impacts.
19. The transport modelling described in the Economic Assessment section of the consultation documents is wholly inadequate and makes reference to the performance of only one junction east of Chippenham. That junction of the A4 and the A342 Devizes Road near the Lysley Arms is effectively a priority T junction with the heavy flows on the A4 having priority over the Devizes Road (A342) traffic. The Economic Assessment merely gives a weighted volume over capacity % for the junction as a whole. That completely disguises the delays likely to be experienced on the Devizes Road (A342) arm of the junction as the weighting greatly favours the much larger free flowing traffic movements on the A4 that are well within the theoretical capacity. The Devizes Road (A342) arms of the junction are likely to suffer very significant additional delays and congestion due to greatly increased peak hour flows on the Devizes Road (A342) and particularly the A4 which will be generated by the 7500 houses in the Future Chippenham proposals. By aggregating the weighted volume over capacity for each arm the percentage given disguises the issues that will be experienced by Devizes Road (A342) traffic. The consultation should be transparent and show the impact on all individual arms of the junction not the weighted average which is misleading.
20. The modelling should also examine the potential issues arising in the local lanes close to the distributor resulting from potential rat running with mitigation measures identified and provision for these within the associated budgets.

21. It also appears that the comparisons with the Do minimum option are distorted by there being only additional housing commitments associated with this option and no additional employment, which would lead to the modelling of greater out commuting and resultant congestion. The Future Chippenham options include both housing and employment allocations and are not true like for like comparisons with the Do Minimum option.
22. The consultation provides no evidence of the amount traffic generated by the proposed development or its distribution and assignment to routes in the network. It is not clear what traffic flows will be anywhere on the network or whether the wider area east of Chippenham including Calne has even been modelled in any detail. This is of huge concern to Calne Without Parish Council; there should be detailed information on the impact on the parish and the town of Calne where traffic conditions and air quality are poor. It should be remembered that Derry Hill and Studley are much nearer the proposed distributor road and developments than Chippenham town centre and there are already have major capacity issues at Studley Crossroads.
23. A proposed development of 7500 houses, 1m square feet of employment provision and a major distributor road connecting to the A350 to both the north and south, will inevitably generate high levels of new traffic and attract rerouting of existing traffic to the A4 though Calne and our parish. The main junctions in Calne and on the A4 west of the town are already congested and operating close to or at their capacity. An example is Studley Crossroads where a relatively small development of 53 houses on the Studley side of the crossroads and which generated relatively low additional traffic movements on the Derry Hill side caused there to be significant queues and delays of over 8 minutes. The developers own traffic consultant showed that peak hour traffic flow on the Derry Hill arm of the junction is 120% of the capacity. This already exceeds all the junctions in Chippenham that have been analysed as part of the consultation and yet Studley Crossroads has not been considered. This and is a major omission for a junction so close to the proposed distributor road and a 7500-house development. Studley Crossroads already has traffic flows on the A4 of 16000 vehicles a day, any increase in A4 flows will reduce the ability of Derry Hill traffic to turn into the A4 with delays increasing exponentially.
24. These traffic issues and the impact of the development and new road on Studley Crossroads, Curzon St, Silver St in Calne, Sandy Lane and surrounding country lanes must be analysed and properly considered as part of the consultation. Without this information the proposals should be rejected and not deferred to a later stage to consider mitigating measures. Mitigating improvements are likely to be considered and rejected as impractical or prohibitively expensive. Studley Crossroads for example has been developed on all sides so there is very little room for improvement and as mentioned earlier is now a major rat run for drivers avoiding congestion on the A3102 in Calne. The only factor suppressing demand for greater use the route as a rat run is the current difficulty in turning right onto the A4. Any improvement in capacity on the Derry Hill Arm at Studley Crossroads will attract a

corresponding increase in rat running traffic to an unsuitable route with environmental and safety issues. Any delays introduced to the currently free flowing A4 traffic will create unacceptable noise and air pollution problems close to the new residential developments at Studley Gardens and Chapel Street.

25. Developments of scale of Future Chippenham require much more detailed examination the wide area affected which must include Calne Without Parish, Bremhill Parish and Calne town centre and the area between Calne and Chippenham, including from the A3102 through Sandy Lane.
26. The consultation document focuses on the benefits to Chippenham but does not make any reference to the detrimental impact on Derry Hill and Studley that are only one mile from the proposed distributor road much nearer than most of Chippenham. The parameters used to assess and model the traffic impact are unclear, out commuting from Chippenham at 64% and Calne at 73% is very high. With little or no information or confidence in the type of new employment envisaged it can only be assumed that the current imbalance between jobs and housing will be further exacerbated resulting in very high levels of peak hour traffic generated by the new housing. A4 traffic levels through Derry Hill, Studley, Sandy Lane and Calne will inevitably rise significantly with travel to work journeys to employment areas to the east such as Berkshire and Hampshire.

RESPONSES TO QUESTIONS

27. To address the specific questions arising from the consultation we would offer the following initial comments on the current proposals:

Q1. Thinking about the options for the potential route of the distributor road and link road, what do you consider are the most important issues that the council should be considering?

Please select all that apply:

- *Improving the availability of sustainable, transport infrastructure e.g. for buses, trains, bicycle and pedestrians. **YES**, but in addition to improving availability the proposals must compel use and deter car ownership and light transport access.*
- *Easing traffic congestion and improving journey times. **YES**. But there is little evidence that linking the A4 to the A350 will provide a more resilient local network to address traffic congestion. The proposed link or distributor road (which this council does not support) will do nothing to stop those with local knowledge seeking to use the most direct routes through the town. Nor does the proposed distributor road design make it an obvious alternate option given it is single carriageway and have many spurs and junctions. See additional comments at paragraphs 8,9 and 10 above.*

- *Climate change adaption/mitigation. YES.* It is questionable given the nature of the proposals and the associated proposed housing development that adequate attention has been paid to the environmental aspects of the whole project. See comments and paragraphs 11, 13, 14 and 15.
- *Improving air/noise pollution. YES.* See comments and paragraphs 11, 13, 14 and 15.
- *Protecting and enhancing biodiversity e.g. animal and plant habitats. YES.* See comments at paragraphs 11, 12 and 15.
- *Protecting and enhancing landscape and visual amenity. YES.*
- *Preserving and protecting heritage assets. YES.* At present the OAR provides little detail, save for the archaeological site of significance at Forest Farm. Given the rich heritage of the area we would expect a full survey to be undertaken to ensure the preservation of key assets
- *Other.* Calne Without Parish Council is unable to support the proposed provision of a distributor road for Chippenham as currently conceived. It will not address the strategic issues identified in the OAR of connectivity and Chippenham Town Centre congestion and it will cause considerable environmental damage. At present, it appears to be a project conceived to support housing development – the first strategic objective - and is more akin to proposal from a developer than an elected representative authority.
- A key consideration not adequately addressed is the wider impact of the proposed distributor road and developments on the much broader surrounding community. This is an important factor often overlooked and gives rise the ‘law of unintended consequences’ – see the example at paragraph 18. Similar issues could arise for Tytherton Lucas, Bremhill and other small communities.

Q2. Please rank the three potential road route options in order of preference. 1 =Most preferred 3 = least preferred.

Calne Without Parish Council does not support the distributor road. Of the Options presented Option C is the preferred route, modified to the ‘best fit’ proposal. This is the shortest practical route but does give rise to environmental concerns that require further investigation and potential mitigation.

Q3. Please provide any specific feedback you would like to give about ‘Option A – Outer Route’.

Calne Without Parish Council does not support the distributor road. Option A is not favoured because of the length, the amount of land likely to be consumed by any housing development, given that a distributor road is not considered a

development boundary as a traditional ring road would be. It is not consistent with providing easy pedestrian and cycle access, particularly from the extremities of any development. Option A has the highest visual impact for our area and will significantly detract from local aesthetics.

Q4. Please provide any specific feedback you would like to give about 'Option B – Middle Route'

Calne Without Parish Council does not support the distributor road. We are surprised Option B is considered to have the lowest environmental impact in Zone 2. This option does not provide easy pedestrian and cycle access and thus will increase road usage.

Q5. Please provide any specific feedback you would like to give about 'Option C – Inner Route'

Calne Without Parish Council does not support the distributor road. On the basis of the evidence presented this route appears to offer good connectivity, the most suitable and location to connect sustainable transport networks with the town and have the lowest overall environmental impact. It is also the shortest route and therefore potentially constrains broader development, although as has been acknowledged the distributor road is not considered a development boundary.

Q6. Please rank the potential Pewsham link road options into order of preference for Pewsham link Option 1 and Pewsham Link Option 2. 1 = most preferred Option, 2 = least preferred option.

Calne Without Parish Council does not support the distributor road. Pewsham Link 3 is the preferred option given it has lower environmental impact and provides good connectivity.