



National Highways Planning Response (NHPR 24-02) Formal Recommendation to an Application for Planning Permission

From: Regional Director, South West Operations Division, National Highways
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To: Wiltshire Council
FAO Joe Richardson

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: PL/2024/09976

Location: Land off Southampton Road and Junction Road, Alderbury, Wiltshire

Proposal: Outline planning permission with all matters reserved apart from details of access from Southampton Road, for a residential development of up to 47 dwellings, along with associated public open space, landscaping and biodiversity enhancements and a car park to serve the community allotments

National Highways Ref: NH/24/08795

Referring to the consultation of the planning application referenced above, in the vicinity of the A30 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);**
- ~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

¹ Where relevant, further information will be provided within Annex A.

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to Planningsw@nationalhighways.co.uk.

Signature: *G Gallacher*

Date: 26 November 2024

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Annex A **National Highway's assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We have undertaken a review of the relevant documents supporting the planning application to ensure compliance with the current policies of the Secretary of State as set out in DfT Circular 01/2022 "The Strategic Road Network and the Delivery of Sustainable Development" and the National Planning Policy Framework (NPPF). This response represents our formal recommendations with regards to planning application reference PL/2024/09976.

Reasons

The application is seeking consent in outline for a speculative development comprising 47 dwellings with associated works, including a new access to be provided from Southampton Road which forms part of the local highway network.

National Highways primary interest is the ongoing safe and efficient operation of the SRN which comprises the A36 and it is in that context that our comments are made. Southampton Road provides two connections to the A36, via an at-grade junction to the north (which does not provide for right turning movements onto the A36), and via a grade-separated junction near Whaddon to the south which provides for all movements. The A36 in this location is dual carriageway and subject to the national speed limit, but immediately north-west of the northern junction towards Salisbury it reverts to single carriageway with a 40mph speed limit. Available collision data does not suggest that there is a pattern of collisions at either junction that would present a significant road safety concern.

Assessment of traffic impact

The A36 corridor, particular towards Salisbury, operates under constraint during network peak periods. It is therefore necessary for the application to be supported by an assessment of traffic impacts which should consider the operation of the SRN in accordance with DfT Circular 01/2022, particularly with regards cumulative development impacts given other speculative development proposals that have come forward within Alderbury in recent years.

A Transport Assessment prepared by Mayer Brown and dated September 2024 has therefore been submitted. This reflects pre-application engagement undertaken by Mayer Brown with National Highways.

Having reviewed the submitted assessment, whilst we remain of the view that the applied trip rate appears low for a development in this location, we consider that applying a higher rate would have a minimal impact on the assessment findings, particularly given the split between the two A36 junctions. The trip distribution is considered reasonable and is accepted.

Given the grade separation and minimal development impact, no specific assessment was requested with regards to the A36 south junction. However, with regards to the A36 north junction, a turning count and queue length survey has been undertaken at our request to enable us to understand whether the addition of development traffic can be safely accommodated, with the inclusion of committed flows, particularly with regards the queuing capacity of the A36 right turning lane. We are satisfied that the survey and associated analysis has demonstrated that sufficient capacity exists at the junction to accommodate predicted traffic flows. We therefore consider that the development is unlikely to result in an unacceptable or severe impact on the A36, in safety or capacity terms, in accordance with the NPPF.

Nonetheless, we will expect Wiltshire Council to secure robust travel plan measures to encourage and support the take up of sustainable travel modes.

Operational asset impacts

The site is in relatively close proximity to the A36, separated from it by a single field. Development therefore has the potential to impact on the operational highways asset and it will therefore be necessary for us to be satisfied that the proposals reflect the requirements of DfT Circular 01/2022 in this regard.

Surface water drainage

We have reviewed the surface water drainage strategy for the site, which we note has been sub-divided into three surface water catchment areas. Catchment areas 1 and 3 have incorporated separate surface water drainage mitigation to attenuate a 1 in 100 year storm event, plus 45% increase for climate change, in-line with local authority guidance. Catchment 1 will incorporate a detention basin and Catchment 3 an underground attenuation tank, and surface water discharge flow rates from Catchment areas 1 and 3 will be restricted to 2.5l/s per catchment, in-line with green-field surface water run-off rates. Surface water flows from Catchment areas 1 and 3 will be discharged into an existing drainage ditch, which follows the northern boundary of the development site which then connects to an existing drainage ditch that runs north-east beside Junction Road, prior to discharging into a 300mmØ Culvert which crosses underneath the A36. Surface water exceedance flows generated by storm events greater than 1 in 100 year events plus climate change will migrate via the topography of the development site to discharge onto the field adjacent to the A36 and onto Junction Road.

Catchment area 2 will be undeveloped, maintaining its existing green-field surface water run-off rate.

Whilst National Highways has no objection to the proposed drainage strategy, given the potential impact on the A36 and the associated culvert crossing, we would welcome an opportunity to review the detailed drainage design to satisfy ourselves that no changes will be made to the design that would affect National Highways drainage assets. We are therefore recommending a condition to this effect.

Screening and noise

National Highways is satisfied that the proposed development is unlikely to impact on the highways soft estate. However, we would wish to stress that National Highways estate must not be relied upon to contribute any screening mitigation to the development. As such the developer must ensure that all required and desired mitigation is provided within the development or by a site boundary feature proposed as part of the development.

The planning authority will need to be satisfied that the development will be sustainable in noise terms and that the Noise Impact Assessment and the identified acoustic measures are sufficient, such that National Highways does not receive complaints from residents in future related to traffic noise from National Highways network. WHO guidelines, which are congruent with BS 8233:2014, advise that “To protect the majority of people from being seriously annoyed during the daytime, it is recommended that the sound pressure level on balconies, terraces, and outdoor living areas should not exceed 55dB LAeq for a steady continuous noise. To protect the majority of people from being moderately annoyed during the daytime, the outdoor noise level should not exceed 50dB LAeq.” National Highways will not take responsibility for dealing with complaints from future residents should the development fail to deliver measures that adequately mitigate for the impacts of traffic noise.

Summary

National Highways has no objection to the proposed development, subject to planning conditions. We would also advise the planning authority to secure robust travel plan measures to support and encourage the take up of sustainable travel modes, and to satisfy itself that the development is sustainable in noise terms.

Recommendation

National Highways recommends that a planning condition should be attached to any permission Wiltshire Council is minded to grant in respect of application reference PL/2024/09976 to the effect that:

Prior to the commencement of development a detailed design for the treatment of surface water drainage shall be submitted to and approved in writing by the local planning authority (in consultation with the strategic highway authority). No surface water shall be permitted to run off from the development on to the strategic road network or into any drainage system connected to the strategic road network. No drainage connections from any part of the development shall be made to any strategic road network drainage systems. Surface water drainage measures shall be implemented in accordance with the agreed design and maintained as such thereafter.

Reason: in the interest of the safe and efficient operation of the A36 trunk road and to protect the highways drainage asset in accordance with DfT Circular 01/2022.

National Highways also offers the planning authority advice to secure robust travel plan measures to support and encourage the take up of sustainable travel modes, and to satisfy itself that the development is sustainable in noise terms

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 74 and 109 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 108 and 114 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the Switch and Improve criteria as set out in clause 4.3 of PAS2080:2023 promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.