



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Head of Planning & Development, Operations Directorate, SW Region,
National Highways
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To: Wiltshire Council (FAO Sarah Hill)
developmentmanagement@wiltshire.gov.uk

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

Council's Reference: PL/2023/10495

Location: Elmfield House, Petersfinger, Salisbury, SP5 3BZ

Proposal: Conversion of Elmfield House and outbuildings to 6 dwellings and the erection of 15 dwellings, with hard and soft landscaping and associated works

National Highways Ref: NH/23/04211

Referring to the consultation on a planning application referenced above, in the vicinity of the A36 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 propose not 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.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature: *G Gallacher*

Date: 14 January 2026

Name: Gaynor Gallacher

Position: Assistant Spatial Planner

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Annex A **National Highways' 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/2023/10495.

Reasons

Background

The application is seeking permission for residential development at Elmfield House and adjacent land. The proposed development comprises the conversion of the existing Elmfield House to provide 6 dwellings, with 15 further dwellings and associated parking and landscaping. The development will be served by an improved vehicular access from Petersfinger Road to the north of the site. There also appears to be a proposed pedestrian access onto the A36 to the south of the site where an existing infrequently used field access is currently located.

Part of the application site benefits from an extant planning consent to provide 5 dwellings with associated works, including vehicular access onto Petersfinger Road, approved under applications 19/00967/OUT and PL/2021/07611.

National Highways has provided previous responses to the planning authority dated 30 January and 30 July 2024, and 30 January and 30 July 2025, requesting further information for our review and acceptance prior to approval of the application. We have also had helpful discussions with the applicant's agent. Our comments below, based on resubmitted documents subject to further formal consultation by the planning authority, should therefore be read in conjunction with those previous responses.

Site Access Arrangements

National Highways has previously advised that it considers that the vehicular traffic impact on the A36 is unlikely to be either unacceptable or severe in safety or capacity terms on the understanding that vehicular access for the completed development will only be provided via Petersfinger Road to the north of the application site. We would expect to secure that by planning condition/obligation.

A36 Construction Access

The application site has an existing direct field access from the A36. The applicant proposes to permanently close this existing access to all vehicular traffic and relocate it to the west to provide a temporary A36 access for the construction period, restricted to left in movements only from the A36, with all movements exiting via Petersfinger Road. This arrangement is set out within the Temporary Access Plan and Site Set Up Plan. Having reviewed these plans we make the following comments:

1. In the location of the proposed revised temporary access, areas of hatching are shown on the plan coloured red and blue, but no key is provided to identify what these hatched areas refer to.
2. The proposed temporary crossing is very angled where it crosses over the existing footway. It will be necessary for the applicant to consider how pedestrian movements (including for those with disability or sight impairments) will be safely accommodated during the construction period.
3. The space available for vehicles to wait before entering the site is only suitable for pantechnic sized vehicles. The applicant will need to explain how longer vehicles eg articulated low loaders involved in the delivery of plant, machinery and materials, will be accommodated as unloading will not be permitted on the SRN.
4. The proposed signing shown on the drawings is of the wrong type to divert westbound traffic to approach the site via a u-turn movement around Bourne Way Roundabout – all temporary signage should be compliant with the requirements of Chapter 8 of the traffic signs manual to ensure that visitors to the site are directed into the site in a safe manner and must be approved by National Highways before being positioned on site.
5. As the existing footway will need to be removed to facilitate the proposed temporary construction access into the site from the A36, pre- and post-condition surveys will need to be undertaken to ensure all reinstatement works to an appropriate standard can take place upon completion of construction. These works for reconstruction of the footway will also need to consider the provision of the proposed pedestrian/shared cycle link from the development onto the A36 footway, with details to be agreed. Any protection/diversion of any NH utilities located within the existing footway will require to be undertaken by the developers at their own cost and may need to include a temporary drainage solution for the temporary bellmouth. It should also be noted that no surface water run off from the site is permitted to be connected into any NH drainage asset and should be managed within the curtilage of the development itself.
6. The applicant must place no reliance on other third-party developers to provide any element of the pedestrian/cycle access and footway works, and all works must be suitable to stand on their own merits.

National Highways considers that these matters could be addressed by planning condition to secure the submission of a Construction Traffic Management Plan, to be agreed with National Highways prior to the commencement of development. The temporary access works will also require the applicant to enter into a suitable s278 legal agreement with us under the Highways Act 1980 to agree the detailed construction access design, construction method, condition surveys, traffic management/signing and reinstatement, with all costs to be met by the applicant. National Highways would also seek a condition to secure the permanent closure of the access upon completion of the construction phase and prior to occupation.

A36 Pedestrian/Cycle Access

The submitted plans continue to propose a pedestrian/cycle access onto the A36 in the location of the existing direct field access, which is to otherwise be stopped up for vehicular traffic. Whilst the principle of an access in this location is accepted and we have no objection to it being restricted to pedestrian/cycle use only, we nonetheless will need to agree a preliminary design including the connection to the existing/reinstated A36 footway. If the access is to be for shared use we will need to be satisfied that a suitable width of shared use path can be provided to connect to the existing cycle path which currently appears to terminate approximate 65 metres to the west, with cyclists required to rejoin the carriageway. It is disappointing that this further detail hasn't been provided given we have previously advised that it will be necessary for us to agree a preliminary design of the works and the connection to the existing A36 footway to ensure they reflect DMRB standards. It is possible that the design may also need to be subject to a Stage 1 RSA and WHCAR (in accordance with GG119 and GG142 respectively). Again, we must stress that the applicant must place no reliance on other third-party developers to provide any element of the pedestrian/cycle access and footway works, and all works must be suitable to stand on their own merits.

Surface and Foul Water Drainage

We understand that the proposal is to outfall surface water discharges into the dry watercourse which passes through the site and continues south via an existing culvert under the A36. As previously advised, the existing culvert is a National Highways Small Span Structure (ID:9559 - Petersfinger 2nd). The box culvert is not very large, and we will expect the applicant to demonstrate that the capacity of the culvert is sufficient to accommodate both existing flows and the additional/changed flows generated by the development.

We have reviewed the updated Flood Risk Assessment and Drainage Strategy report which contains the following information:

1. Flood Risk Assessment
2. Existing Site Layout Plan including Geological Assessment
3. Greenfield Surface Water Run-off Calculations
4. Proposed Impermeable Surfacing Calculations & Plan
5. Descriptive Drainage Strategy including SuDS proposals
6. Proposed Surface Water Catchment Layout. See attached developers drawing Proposed Hardlandscaping Areas and Catchments 23010-901 P1
7. Drainage Maintenance Schedule

However, the following has not been included within the submitted documents:

1. Outline Surface Water Layout Plan showing the position of chambers, gullies, pipework, attenuation, discharge points, headwalls and soakaways
2. Outline details of the proposed surface water culvert within the alignment of the existing dry watercourse and its connection to the existing culvert that runs underneath the A36

3. Outline Foul Drainage Layout Plan showing the position of chambers and pipework, and its interaction with the layout of the proposed surface water drainage
4. Flood Exceedance Plan showing the likely flood routes for storm events that exceed a 1 in 100-year storm event plus climate change

This information is therefore required to demonstrate that the applicant can install the surface water drainage and foul sewerage system within the confines of the development site, and to confirm where it is intended to discharge the surface water into the watercourse, and enable us to understand how the foul drainage arrangement is intended to connect into the existing sewage system as this could also impact on the A36.

Landscaping/Arboricultural

The updated landscape design and arboricultural report are noted and considered acceptable

Noise

The development site is in close proximity to the A36, and to a noise important area as identified by Defra. Whilst an updated Noise Assessment has been provided we remain concerned with regards to the sustainability of the site in noise terms. We would continue to advise the planning authority to be satisfied that the development will deliver measures which adequately mitigate noise to levels as set out in BS8233:2014 and WHO guidelines. National Highways will not be held liable for any adverse noise impact arising from the operation of the A36 should the development fail to such deliver measures.

If Wiltshire Council decides to accept that the development does not compromise adopted national, regional or local planning policies, and the development is warranted in that it offers “*convenience of living in these locations or making efficient use of land resources to ensure development needs can be met*”, then the Council should ensure that prospective buyers are fully aware of the noise situation and that the Council bear responsibility to act on any future complaints of traffic noise.

Noise Fencing and Boundary Treatments

The proposed 3m acoustic fence along the A36 boundary would be classed as a Category 0 structure, as defined in the DMRB ([CG 300](#)) and would therefore require a Design and Check Certificate signed by a suitably qualified. The certificate would need to be supplied to National Highways (Safety and Engineering Standards team) along with the CV of the person signing it on behalf of the designer. Certification will need to be completed at the fence design stage and prior to its construction.

We will also require a detailed A36 boundary treatment plan showing the exact location of the fencing in relation to the highway boundary, design details (including certification), construction method and maintenance schedule to ensure the proposals comply with the requirements of DfT Circular 01/2022 which states that for reasons of safety, liability and maintenance 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. Any fences, screening or other structures should

be erected wholly on the developer's land, and far enough within the developer's land to enable maintenance to take place without encroachment onto highway land, or otherwise adversely impacting on the integrity of the highways asset. We continue to be satisfied that this could be addressed by planning conditions.

Summary

National Highways has reviewed the updated documents provided but considers that further information is still required to enable us to fully understand the impact of the development on the safe and efficient operation of the A36 trunk road. In particular, further details should be provided in relation to:

- a preliminary design for the proposed pedestrian/cycle access onto the A36, its means of connection with the existing footway and its suitability for shared use;
- the proposed surface water drainage and foul sewage arrangements, their impact on the existing National Highways culvert structure and National Highways means of access for maintenance purposes.

We consider matters in relation to landscaping, boundary treatments, construction traffic management and construction access arrangements could be addressed by planning conditions. National Highways also continues to offer the planning authority advice in respect of the sustainability of the site in noise terms.

Recommendation

National Highways recommends that Wiltshire Council does not grant planning permission in respect of planning application reference PL/2023/10495 for a period of up to 6 months from the date of this recommendation.

This is to allow time for further information to be provided to enable National Highways to fully understand the impact of the development on the safe and efficient operation of the A36 trunk road and thereby provide informed advice to the planning authority.

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 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

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.