



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

From: Head of Planning & Development, Operations Directorate, SWRegion,
National Highways
Planningsw@nationalhighways.co.uk

To: Wiltshire Council (FAO Jemma Foster)
developmentmanagement@wiltshire.gov.uk

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

Council's Reference: PL/2026/02268

Location: Land West of North Lodge, 128 High Street, Codford St Peter, BA12 0NJ

Proposal: Erection of two detached dwellings with new access and associated works

National Highways Ref: NH/26/16058

Referring to the consultation on a planning application referenced above, in the vicinity of the A36 that form 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: 29 May 2026

Name: Gaynor Gallacher

Position: Assistant Spatial Planner

National Highways: Ash House, Falcon Road, Sowton Ind. Estate, Exeter EX2 7LB

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/2026/02268.

Reasons

The application is seeking permission in full for two dwellings located on a site immediately to the north of the A36 trunk road at Codford. Access will be provided via the minor road to the north of the development site. The adequacy of the access arrangements will therefore be a matter for Wiltshire Council as the local highways authority to determine. The application follows two previous submissions PL/2023/07301 and PL/2024/08861.

National Highways principal interest is the potential impact of the development on the safe and efficient operation of the SRN, which in this case comprises the A36, and it is in that context our comments are made. Whilst we consider that the traffic impact of the development on the A36 junction is not material, the development has the potential to impact on the operational strategic highway assets and it is therefore necessary for us to be satisfied that the development meets the requirements of DfT Circular 01/2022 in this regard.

DfT Circular 01/2022 states at paragraph 57 that *"For reasons of safety, liability and maintenance, any physical infrastructure that is necessary to mitigate the environmental effects of or on development must be located outside of the highway boundary of the SRN. In general terms, structures should be sited sufficiently far from the highway boundary of the SRN so that they cannot ... undermine its geotechnical integrity"*. Paragraph 59 goes on to state that *"To ensure the integrity of the highway drainage systems, no new connections into those systems from third party development and proposed drainage schemes will be accepted. Where there is already an existing informal or formal connection into the highway drainage system from a proposed development site, the right for a connection may be allowed to continue provided that the flow, rate and quality of the discharge into the highway drainage system remains unaltered or results in a betterment"*

We welcome the applicant's engagement with National Highways prior to the submission of the current application to address the concerns we raised in response to the previous proposals.

Drainage and Geotechnical Risk

The proposed drainage layout is set out within the Proposed Site Plan Rev G. We note that the developer has undertaken a ground investigation, with trial pit drainage infiltration tests, to confirm the grounds suitability to install soakaway systems. It would appear that the treated sewage drainage soakaway field has been moved closer to the A36 than considered at the pre-application stage, but it remains outside of our minimum requirement of a 5 metres set back from the SRN boundary.

The proposed surface water soakaway system, with associated drainage network, has been designed in-line with local authority guidance to mitigate for storm events up to and including a 1 in 100-year storm event plus 40% increase for climate change and is positioned near to the treated sewage drainage soakaway field. The applicant has provided a Drainage Statement, Calculations and Flood Exceedance Plan to support the installation of the surface water soakaway system.

National Highways considers the proposed preliminary drainage design to be acceptable, subject to a condition to secure the detailed drainage design for our review and acceptance insofar as any SRN impacts, prior to commencement of development.

We are also satisfied that the drainage arrangements and proposed site layout as now proposed are unlikely to present a geotechnical risk to the SRN and no geotechnical reporting will be required.

Landscaping and Boundary Treatments

It is noted that no works are proposed which should impact on trees and vegetation within National Highways estate and that appropriate root protection measures will be implemented. We have noted that native hedge planting on the A36 boundary will be within the proposed noise fencing, on the development side of the fence, which is acceptable in respect of potential future maintenance requirements. Details are provided within the BNG Metric Plan Rev A and we consider the proposed species mix to likewise be acceptable.

The proposed 2.4 metre acoustic fence will be set back 1 metre from the existing A36 boundary fence to ensure a suitable maintenance strip can be provided. Whilst a fence of this height in proximity to the SRN would usually require design and check certification to be provided, we are satisfied that given the set back from the SRN and the intervening bund which the fence will be located behind, the risk to the SRN is minimal and no further reporting will be required in this case subject to the fencing being installed in accordance with the submitted Proposed Boundary Detail Plan Rev C.

Noise

National Highways has noted the acoustic report and the provision of 2.4 metre acoustic fencing to the site boundary with the A36. However, we continue to have concerns with regards the sustainability of the site in noise terms. National Highways expects noise levels within new developments to conform to 'desirable' thresholds specified in BS 8233:2014 so that indoor and outdoor spaces can be utilised as

intended. WHO noise guidance, which is congruent with BS 8233:2014, advises *“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.”*. In this location, National Highways considers that noise levels in private outside spaces should not exceed 50dB LAeq.

National Highways therefore advises the planning authority to satisfy itself that the development will deliver measures which adequately mitigate noise to the ‘desirable’ level 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 deliver such measures.

Summary

National Highways has no objection to the proposed development subject to planning conditions. We also offer the local planning authority advice with regards the sustainability of the site in noise terms.

Recommendation

National Highways recommends that planning conditions should be applied to any permission Wiltshire Council is minded to grant in respect of application PL/2026/02268 to the effect that:

1. Prior to the commencement of development, a detailed design for the treatment of surface and foul water drainage shall be submitted to and approved in writing by the local planning authority (in consultation with the strategic highway authority). No 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. Drainage measures shall be implemented in accordance with the agreed design prior to the development being brought into use and maintained as such thereafter.

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

2. Fencing and hedge planting proposed for the A36 trunk road boundary shall be implemented in accordance with the Site Elevations East and West and Proposed Boundary Detail Plan Rev C dated 28 April 2025, and maintained as such thereafter.

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

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.