

Highway Development Management Consultation Response

Planning Application Ref: PL/2026/03045

Site Address: Land off Damask Way, Warminster

Proposal: Outline planning application for the erection of up to 49 dwellings with associated access, public open space, landscaping, drainage and associated infrastructure (all matters reserved except access).

Date of Consultation Response: 30/07/2026

Recommendation: Object.

Introduction

I note the proposals seek Outline consent with all matters reserved except for access, for the construction of 49 residential dwellings on previously undeveloped land, with primary access taken from Upper Marsh Road.

I am aware of the planning history on this site, with an Outline application for 29 residential units granted consent under 17/12348/OUT. Additionally, two separate Reserved Matters (REM) applications were submitted, with one Refused consent and one Withdrawn, both due to the suitability of pedestrian and cycle infrastructure and emergency access issues.

This latest submission, whilst similar in nature to that approved under 17/12348/OUT, is at a significantly larger scale to that previously approved.

Primary Access Matters

The proposed site access from Upper Marsh Road is stated as matching that previously approved, however, this is misleading. The access is shown around a further 10m south from the approved location and the access geometry has altered from that previously approved as well. The original design showed a 5.5m width, with a 2m wide footway around the southern radius, but the design submitted here shows a 5.2m carriageway with no footway. This is not considered adequate for a development on this scale, where a minimum 5.5m carriageway and a single 2m footway is required throughout the main access road.

Additionally, the levels of the site access have not been demonstrated as achievable. It is essential that a maximum gradient of 1 in 30 is provided over the first 9m of the access and a maximum of 1 in 12 is provided throughout. No levels information has been provided to demonstrate that this is achievable in the new location. Also, there is no detail in respect to the likely retaining features required or the supporting bank slope gradient. Whilst the details of such features can be conditioned, given the significant level differences and requirements for the carriageway gradients to be determined, an in principle understanding of these retaining elements is essential in the context of this submission.

The visibility splays shown at the new access position are 2.4m x 43m in both directions and these meet national guidance in full and are thus accepted.

As such, a significant amount of additional information and revisions are required to demonstrate that the proposed access point is achievable and suitable for a development on this scale.

Traffic Impact

The submitted Transport Statement (TS) has assessed the impact of the development and forecast two-way trips of 33 AM, 32 PM and 290 daily. The methodology used to determine these trip rates is robust and the trip rates are thus accepted. These show a significant increase in the total number of trips from the previously approved development for 29 units, which forecast 15 AM, 13 PM and 122 daily. Given the constrained nature of the surrounding highway network, in particular, a section of Upper Marsh Road to the northwest, this is a concern.

The existing flows on Upper Marsh Road have been recorded and the TS states that these demonstrate that the route is lightly trafficked. Whilst this may be so existing, the above trip forecasts show that the development would significantly increase the total flows on Upper Marsh Road, especially with 88% of traffic from the development expected to head towards/from the northwest.

I welcome the use of Junctions 11's Lane Simulation mode to model the impact of the development and background traffic growth in the future year scenario of 2031. As acknowledged within the TS, the with/without development scenarios show that the development would have an impact on the capacity of Upper Marsh Road, with the 'Level of Service' (LOS) for the western section of Upper Marsh Road being downgraded to category C. The TS understandably summarises that this shows that there would be no capacity issue brought about by the development, as a category C LOS still provides adequate highway performance. Whilst this is accepted, what this capacity assessment shows is that there will be an impact and that impact must therefore also be considered in respect to safety matters also and not just the free flow of traffic.

The Lane Simulation mode of J11 is an aggregate lane-interaction tool and not a microsimulation tool that can track actual wheel movements in narrow highway areas. Whilst capacity is clearly not an issue, the data clearly shows that the development traffic will create some minor delays. This therefore suggests that the development will increase the likelihood of vehicles meeting at the single track section of Upper Marsh Road, which will, in my view, be to the detriment of highway safety.

The previous Outline provided mitigating measures on Upper Marsh Road in the form of localised widening. This provided 4.8m/4.1m widths where possible, meaning that only a short 35m section remained of single width. This was considered adequate mitigation for the development of 29 units at that time. This latest proposal has not offered this same mitigation, although suggests that the applicant would be willing to consider this if required. Given the increase in scale of the development by 75% in terms of unit numbers and over 100% in terms of traffic increase, I do not believe that the former mitigation scheme is adequate to accommodate the level of traffic brought about by this increased scale of development.

The proposals on this scale therefore propose a significant risk to highway safety on Upper Marsh Road in my view, which cannot be acceptably mitigated. This therefore presents a fundamental concern for the Local Highway Authority.

Active Modes

The TS states that the development site will be fully integrated into the local pedestrian and cycle network, however, it completely fails to acknowledge the reasons why neither of the previous REM submissions managed to gain consent, which was as a result of not being able to demonstrate that adequate access could be provided for all types of users, including disabled and vulnerable users.

The main barrier to providing access for all users was the gradient of the site, with the disability framework requiring a maximum gradient of 1 in 20. This was not previously possible along the access road and whilst the shared use path towards the Damask Way emergency access link could be satisfactorily laid out, the emergency access link was too steep and outside of the applicant's control. From the red line submitted and the lack of reference to this matter, I do not believe that this issue has been or can be resolved acceptably.

Whilst the previous Outline gained consent despite these issues, this was prior to the matter being properly assessed. Now that there are clear barriers to providing adequate pedestrian access to the site for all users, this matter must therefore be considered as a primary access matter in any Outline submission where access is not reserved. I would thus expect adequate pedestrian access to be demonstrated within this submission, with a maximum gradient of 1 in 20 throughout. This does not appear possible.

I note that the submission offers to provide a financial contribution towards the LCWIP Route 9, which whilst welcomed, does not adequately mitigate the issues mentioned above.

On Site Matters

The internal site layout is a reserved matter and not subject to detailed consideration within this submission. However, as mentioned above, it is essential that the main access road is provided with a minimum 2m wide footway, which is not shown.

The wider internal layout, subject to details, appears adequate.

Conclusion

Therefore, this submission lacks sufficient information to determine whether the proposed access arrangements can be satisfactorily achieved with suitable geometry and gradients, both for vehicles accessing off Upper Marsh Road and pedestrians/cyclists accessing from Damask Way.

The significant increase in the scale of the proposals compared to that previously consented raises serious highway safety concerns on the western section of Upper Marsh Road, which, for the scale of the development proposed, cannot be satisfactorily mitigated.

As such, I recommend that this application is refused on Highway grounds for the following reasons;

1. The proposed new access and pedestrian footway that would link the development with the highway at the junction with Damask Way would not be accessible to all members of the public.
In addition insufficient information has been submitted to the Local Planning Authority to determine whether the proposed access from Upper Marsh Road can be achieved with adequate geometry and gradients.
The proposed development is therefore contrary to Core Policies 57 and 61 of the Wiltshire Core Strategy, policy L1 of the Warminster Neighbourhood Plan and paragraphs 111 and 112 of the Framework.
2. The proposals on this scale will be likely to create unacceptable highway safety issues as a result of the increase in vehicular traffic generated by the development and the constrained width of the northwestern section of Upper Marsh Road. This will be likely to create conflict between vehicles and cause undesirable reversing manoeuvres on the public highway, in a location where forward visibility is restricted and there are no designated footways. This increased risk is especially likely considering the increase in traffic from the previous scale of development proposed and the lack of suitable mitigation being available. The proposals are thus considered contrary to NPPF 2024 Section 9, paras 109, 115 & 117 and Wiltshire Core Strategy, Core Policies 57, 60 and 61.

If you have any queries regarding the above advice, please contact Chris Manns using Christopher.Manns@wiltshire.gov.uk