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HIGHWAY TECHNICAL REBUTTAL

Land Opposite Jubilee Cottage, Witt Road, Winterslow, Wiltshire SP5 1PL

Planning Application PL/2026/03223

Outline Application for the Erection of Five Self-Build Dwellings

1.0 Introduction

1.1 Purpose of this Report

1.1.1 This Highway Technical Rebuttal has been prepared on behalf of the Applicant in response to the consultation response issued by Wiltshire Council Highways Development Management dated 30 June 2026 in relation to planning application **PL/2026/03223** for the erection of five self-build dwellings on land opposite Jubilee Cottage, Witt Road, Winterslow. The Highway Authority's consultation response concludes that the proposal would result in an unacceptable impact on highway safety and that the residual cumulative impacts on the local highway network would be severe.

1.1.2 The purpose of this document is to undertake a detailed technical review of the matters raised by the Highway Authority and to demonstrate, through objective evidence, that the conclusions reached are not supported by the available data, the recorded safety performance of the highway network, previous planning decisions or the requirements of national planning policy.

1.1.3 This document should therefore be read alongside the previously submitted Transport Statement and should be regarded as a comprehensive technical response to the highway concerns raised during the determination of the application. It does not replace the Transport Statement; rather, it supplements it by addressing each of the issues raised by the Highway Authority in greater detail.

1.2 The Proposed Development

1.2.1 The application seeks outline planning permission, with all matters reserved except access and layout, for the construction of five detached self-build dwellings together with a new vehicular access from Witt Road, internal access road, parking, turning areas and associated landscaping.

1.2.2 The development occupies previously developed land that currently accommodates a barn together with areas of storage and container uses. The proposal represents a logical extension of existing residential development within this part of Winterslow and lies immediately adjacent to the settlement boundary.

1.2.3 Vehicular access is proposed directly from Witt Road, with visibility splays designed in accordance with the recorded 85th percentile traffic speeds on the adjoining highway. Parking provision accords with Wiltshire Council's adopted parking standards and sufficient space is available within the site to accommodate turning facilities, enabling vehicles to enter and leave the public highway in a forward gear.

1.3 Background

1.3.1 Prior to the submission of the planning application, the proposal was the subject of pre-application discussions with Wiltshire Council.

1.3.2 During those discussions, the Highway Authority expressed concerns regarding the suitability of Witt Road to accommodate additional residential development, principally because the road is relatively narrow, contains no formal footways and serves a number of Public Rights of Way. Similar concerns have been raised historically in relation to other residential developments served from Witt Road.

1.3.3 However, despite those concerns, planning permission has subsequently been granted for residential development immediately adjoining the application site under planning permission **PL/2022/07116** following an earlier appeal decision in which the Planning Inspector concluded that the modest increase in traffic generated by residential development would **not** have an unacceptable impact upon highway safety.

1.3.4 The Inspector concluded that although Witt Road did not conform to modern highway design standards, its physical characteristics were typical of many rural village roads and the additional traffic generated by a small residential development would not materially alter the manner in which the road operated. These findings remain highly material to the current proposal because the physical characteristics of Witt Road remain substantially unchanged and, if anything, opportunities for opposing vehicles to pass have improved following the construction of a formal passing place associated with the approved development.

1.4 Summary of the Highway Authority's Objection

1.4.1 The Highway Authority does not dispute that the proposed development is relatively small in scale, nor does it dispute the broad level of traffic generation predicted within the submitted Transport Statement.

1.4.2 Instead, the objection is founded primarily upon concerns regarding the interaction between that additional traffic and the existing characteristics of Witt Road. In summary, the Highway Authority considers that:

- Witt Road is of restricted width and contains limited opportunities for opposing vehicles to pass;
- pedestrians are required to walk within the carriageway because no formal footways exist;
- the proposed development would increase the frequency of interaction between vehicles and pedestrians;
- the proposal should be considered cumulatively with other recent residential developments served from Witt Road;
- the cumulative increase in traffic would amount to a "step change" in highway activity;
- these cumulative impacts would result in severe residual impacts upon the local highway network.

1.4.3 The consultation response further identifies several drafting inconsistencies within the submitted Transport Statement relating to visibility splays and comments upon the selection of one comparison site within the TRICS assessment. However, the Highway Authority nevertheless acknowledges that the predicted daily trip rate of approximately five vehicle movements per dwelling is consistent with what would normally be expected for this form of residential development.

1.5 Scope of this Rebuttal

1.5.1 The Applicant has carefully considered every aspect of the Highway Authority's consultation response. Where factual corrections are necessary, these are acknowledged.

1.5.2 For example, several references within the Transport Statement inadvertently referred to "Newton Lane" rather than Witt Road. These are clearly drafting errors arising during document preparation and will be corrected within any updated submission. Importantly, however, the Highway Authority accepts that appropriate visibility splays are capable of being achieved and these drafting inconsistencies have no bearing upon the technical acceptability of the proposed access.

1.5.3 The principal purpose of this rebuttal is therefore not to revisit minor drafting matters but to examine whether the available technical evidence supports the Highway Authority's conclusion that the proposal would give rise to a severe adverse impact on the transport network, including cumulative impacts. This report therefore considers:

- the existing operation of Witt Road;
- recorded traffic volumes and vehicle speeds;
- the highway safety record;
- pedestrian activity;
- trip generation associated with the proposed development;
- cumulative traffic effects;
- previous planning decisions;
- the Planning Inspector's findings;
- compliance with national and local planning policy.

Each issue raised by the Highway Authority is examined individually using objective evidence wherever possible.

1.6 Burden of Proof

1.6.1 The National Planning Policy Framework (August 2026) now expresses the relevant decision-making test through Policy TR6: Assessing transport impacts. TR6(4) states that development proposals should be refused if they would have a severe adverse impact on the transport network, in terms of capacity and congestion including cumulative impacts, or an unacceptable impact on highway safety, taking account of mitigation and wider network improvements.

- Accordingly, the two relevant tests for this proposal are whether it would result in:
- an unacceptable impact on highway safety; or a severe adverse impact on the transport network in terms of capacity and congestion, including cumulative impacts.

These remain demanding policy tests and must be applied to the actual transport consequences of the development.

1.6.2 Accordingly, it is not sufficient to demonstrate merely that traffic would increase or that drivers may occasionally need to slow, wait or give way to opposing vehicles. Such circumstances are commonplace on rural roads throughout England and do not, in themselves, justify the refusal of planning permission.

1.6.3 Rather, the available evidence must demonstrate that the proposal would create an unacceptable highway safety impact or a severe adverse impact on the transport network in terms of capacity or congestion, including cumulative effects. It is respectfully submitted that the consultation response does not establish either outcome.

1.6.4 Whilst concerns are expressed regarding the theoretical possibility of increased interaction between road users, no quantified assessment has been undertaken of:

- the frequency with which opposing vehicles would actually meet;
- the probability of vehicle reversing manoeuvres;
- the number of additional pedestrian interactions likely to occur;
- or the extent to which these interactions would materially affect highway safety.

Instead, the objection is founded largely upon assumptions regarding potential conflict rather than evidence demonstrating actual harm.

1.6.5 The following chapters examine those assumptions in detail and demonstrate why the available evidence does not support the conclusion that the proposed development would result in either an unacceptable impact upon highway safety or a severe adverse impact on the transport network, including cumulative impacts.

2.0 Site Location and Existing Highway Context

2.1 Introduction

2.1.1 A thorough understanding of the characteristics of the surrounding highway network is fundamental when assessing the potential transport implications of any proposed development. Whilst the Highway Authority correctly identifies that Witt Road does not conform to modern highway design standards, this fact alone does not indicate that it operates unsafely or is unsuitable to accommodate a modest level of additional residential traffic.

2.1.2 Indeed, many rural settlements throughout Wiltshire are served by narrow lanes with limited carriageway widths, an absence of footways and informal traffic management arrangements. These roads continue to operate safely because vehicle speeds are generally low, traffic volumes are modest and drivers naturally adapt their behaviour to the prevailing highway environment.

2.1.3 Accordingly, the highway implications of this proposal should not be assessed solely by reference to the physical characteristics of Witt Road in isolation, but by considering how the road currently operates in practice, its existing safety record, the level of traffic that it accommodates and the scale of change that would result from the proposed development.

2.2 Site Location

2.2.1 The application site occupies land on the western side of Witt Road, opposite Jubilee Cottage, approximately 110 metres south-west of its junction with The Common and Gunville Road, on the southern edge of Winterslow.

2.2.2 The site currently accommodates a barn together with areas used for the storage of containers and associated equipment and represents previously developed land contained within an established roadside frontage. Existing residential development lies immediately to the north, east and west of the site, whilst woodland and agricultural land extend beyond the southern boundary.

2.2.3 The proposal therefore represents a logical continuation of the existing pattern of development along Witt Road rather than an isolated incursion into the wider countryside.

2.2.4 Importantly, the application site lies immediately adjacent to the existing settlement and within a short walking distance of the village centre, bus services and local facilities. The proposal therefore occupies a location that already functions as part of the established built form of Winterslow.

2.3 Character of Witt Road

2.3.1 Witt Road is a short rural residential lane extending for approximately 500 metres between its junction with The Common/Gunville Road and the network of Public Rights of Way located to the south. The road principally serves:

- existing residential properties;
- agricultural land;
- areas of woodland;
- Public Footpaths WSLO69 and WSLO70;
- Bridleways WSLO71 and WSLO76.

Unlike distributor roads or strategic routes, Witt Road performs a purely local access function.

2.3.2 There is no through route beyond the Public Rights of Way and consequently the road experiences very little non-local traffic.

2.3.3 The overwhelming majority of vehicle movements comprise residents, visitors, deliveries and service vehicles associated with properties situated along Witt Road itself.

2.3.4 Consequently, driver expectations are entirely consistent with those normally associated with lightly trafficked rural residential lanes where vehicles proceed cautiously and are prepared to give way to opposing traffic where necessary.

2.4 Highway Geometry

2.4.1 The Highway Authority correctly observes that Witt Road is relatively narrow and that parts of the carriageway do not comfortably permit two vehicles to pass simultaneously. This characteristic has existed for many decades and forms part of the established rural character of the village. Importantly, this does not prevent the road from operating safely.

Drivers naturally respond to the restricted width by:

- travelling at relatively low speeds;
- maintaining appropriate observation;
- yielding where necessary;
- making use of existing passing opportunities.

Such behaviour is entirely typical of lightly trafficked rural roads and reflects well-established driver expectation rather than any highway deficiency.

2.4.2 It is also noteworthy that no evidence has been presented by the Highway Authority to suggest that these characteristics currently give rise to abnormal levels of collision or conflict.

On the contrary, the recorded safety record demonstrates that the existing arrangement functions satisfactorily.

2.5 Existing Passing Opportunities

2.5.1 A recurring theme throughout the Highway Authority's consultation response concerns the availability of passing opportunities along Witt Road.

2.5.2 Whilst there are sections where two opposing vehicles cannot comfortably pass without one driver yielding, the consultation response somewhat overstates the extent to which this presents an operational problem. In practice, a number of opportunities already exist which allow vehicles to pass one another safely. These include:

- existing residential driveways;
- private accesses;
- widened frontage areas;
- verge overruns;
- the formal passing place constructed as part of planning permission PL/2022/07116.

The latter is particularly significant because it did not exist at the time the earlier appeal relating to adjoining land was determined.

2.5.3 Consequently, highway conditions have improved since the Planning Inspector concluded that residential development would not prejudice highway safety. The Highway Authority acknowledges the existence of this passing place but affords it very little weight within the assessment.

2.5.4 Respectfully, this represents a significant omission because it provides an additional formal location where opposing vehicles may safely pass whilst simultaneously offering refuge for pedestrians should they wish to step clear of the carriageway.

2.6 Vehicle Speeds

2.6.1 The submitted Transport Statement includes the results of a seven-day automatic traffic survey undertaken within the vicinity of the proposed access. The survey demonstrates that actual traffic speeds are substantially lower than those commonly associated with unrestricted rural roads.

Recorded 85th percentile speeds were:

- 22.8 mph northbound
- 20.9 mph southbound

These recorded speeds are particularly important because they demonstrate that drivers are already moderating their behaviour in response to the physical characteristics of Witt Road.

2.6.2 The Highway Authority did raise questions with regards to the data supplied within the original Transport Statement and on review it is acknowledged that these was an error with both the traffic speeds, volumes and the road name. this was clearly an error, although the traffic survey data and the visibility splay drawing were correct. This error has now been addressed and a revised report issued.

2.6.3 Low vehicle speeds are one of the most important contributors to highway safety because they:

- reduce stopping distances;
- increase available reaction time;
- improve driver awareness;
- reduce collision severity;
- improve interaction between motorists and pedestrians.

Accordingly, the measured traffic speeds recorded on Witt Road should properly be regarded as a positive feature of the existing highway environment rather than a cause for concern.

2.7 Traffic Volumes

2.7.1 In addition to recording vehicle speeds, the automatic traffic survey also established that Witt Road carries relatively low volumes of traffic throughout the day. The Highway Authority does not dispute this conclusion.

2.7.2 Indeed, the consultation response accepts that the proposal itself would generate only approximately twenty-five additional vehicle movements during a typical weekday. The significance of the existing traffic flows cannot be overstated.

2.7.3 The operation of narrow rural roads is influenced not simply by their physical width but by the number of vehicles attempting to use them. A lightly trafficked single-track lane can operate perfectly satisfactorily because opportunities for opposing vehicles to meet are naturally infrequent.

2.7.4 Conversely, even a relatively wide road may experience congestion if traffic volumes are sufficiently high. It is therefore essential that both the geometry of the road and the level of traffic using it are considered together.

2.7.5 As will be demonstrated later within this report, the existing traffic flows on Witt Road remain exceptionally low and the modest increase associated with five additional dwellings would not materially alter the way in which the road currently operates.

2.8 Pedestrian Environment

2.8.1 The Highway Authority also places considerable emphasis upon the absence of formal pedestrian footways. Again, this characteristic is readily acknowledged.

2.8.2 However, the absence of a footway should not automatically be equated with an unsafe highway environment. Throughout rural Wiltshire there are numerous villages where pedestrians and vehicles share the carriageway. The safe operation of these roads relies upon:

- low traffic volumes;
- low traffic speeds;

- good forward visibility;
- mutual awareness between road users;
- appropriate driver behaviour.

These characteristics are all present on Witt Road.

2.8.3 Furthermore, previous pedestrian surveys undertaken in connection with earlier planning applications demonstrated extremely low levels of pedestrian activity. The Transport Statement also established that the proposed development would generate only a very modest increase in pedestrian movements.

2.8.4 Consequently, the opportunity for conflict between vehicles and pedestrians remains inherently limited. The excellent personal injury collision record provides further objective evidence that the existing shared use of Witt Road operates safely in practice.

2.9 Existing Highway Performance

2.9.1 Ultimately, the best indicator of whether a road functions satisfactorily is not whether it conforms to every aspect of modern highway design guidance, but how it performs in practice. In the case of Witt Road, the available evidence demonstrates:

- relatively low traffic speeds;
- exceptionally low traffic volumes;
- very limited pedestrian activity;
- a very good personal injury collision record;
- successful operation over many years despite its rural characteristics.

2.9.2 These factors indicate that motorists already adapt appropriately to the prevailing highway environment.

- The proposal does not alter the physical geometry of Witt Road.
- It does not remove passing opportunities.
- It does not increase traffic speeds.
- It simply introduces a modest number of additional residential vehicle movements onto a road that already functions safely.

2.9.3 Accordingly, the existing highway context provides a sound baseline against which the impact of the proposed development can properly be assessed.

2.10 Chapter Summary

2.10.1 The Highway Authority's consultation response correctly identifies that Witt Road is a narrow rural lane with limited opportunities for opposing vehicles to pass and no formal pedestrian footways. However, those characteristics are longstanding, typical of many rural settlements and do not, of themselves, demonstrate an unacceptable highway environment.

2.10.2 The available evidence demonstrates that Witt Road performs a local access function, carries very low volumes of traffic and operates at relatively low vehicle speeds. Drivers naturally adapt their behaviour to the prevailing conditions, and the recorded collision history confirms that this environment has functioned safely over a sustained period.

2.10.3 This chapter therefore establishes the factual baseline for the remainder of this report. Subsequent chapters examine whether the modest increase in traffic associated with five additional dwellings would materially alter these existing conditions or whether, as is respectfully submitted, the Highway Authority has substantially overstated the likely transport impacts of the proposal.

3.0 Existing Highway Conditions

3.1 Introduction

3.1.1 The Highway Authority's objection is founded upon the premise that Witt Road is incapable of safely accommodating the additional traffic associated with the proposed development. Whilst the physical characteristics of the road are not disputed, the available evidence demonstrates that its existing operational performance is significantly better than suggested within the consultation response.

3.1.2 It is a fundamental principle of transport assessment that the impact of development should be assessed against existing operating conditions rather than against theoretical design standards alone. Accordingly, the assessment of highway impact should be based upon measured traffic volumes, observed vehicle speeds, collision records and actual driver behaviour.

3.1.3 The evidence presented within the submitted Transport Statement demonstrates that Witt Road currently operates as a lightly trafficked rural access lane where vehicle speeds are low, traffic volumes are modest and motorists naturally adapt their behaviour to the prevailing highway conditions. The Highway Authority's consultation response gives relatively little consideration to these objective characteristics and instead focuses predominantly upon the physical geometry of the road.

3.1.4 This chapter therefore examines the existing operation of Witt Road in greater detail and demonstrates that its current performance provides a robust baseline against which the proposed development should be assessed.

3.2 Function of Witt Road

3.2.1 The Highway Authority correctly identifies Witt Road as a narrow rural lane. However, it is equally important to recognise the role that the road performs within the wider highway hierarchy. Unlike distributor roads, strategic routes or commuter corridors, Witt Road performs an entirely local access function. The road principally serves:

- Existing residential properties;
- Agricultural land;
- Woodland;
- Public Rights of Way;
- Local deliveries and servicing;
- Visitors to adjacent properties.

3.2.2 The road does not provide a convenient through-route for general traffic and terminates shortly beyond the application site at the Public Rights of Way network. Consequently, virtually all vehicles using Witt Road have a legitimate destination along the road itself.

3.2.3 This characteristic has an important influence upon driver behaviour. Drivers entering Witt Road generally:

- expect to encounter pedestrians;
- expect to encounter cyclists;
- expect to meet opposing vehicles;
- travel cautiously;
- are prepared to give way when required.

3.2.4 These behavioural characteristics are entirely different from those experienced upon roads carrying significant through traffic and represent one of the reasons why narrow rural roads frequently operate safely despite not conforming to modern highway design standards.

3.3 Existing Traffic Surveys

3.3.1 To establish an accurate understanding of the existing operation of Witt Road, a seven-day automatic traffic survey was undertaken in the vicinity of the proposed site access. The survey recorded both traffic volumes and vehicle speeds over a continuous monitoring period.

3.3.2 Unlike assumptions regarding likely traffic conditions, automatic traffic surveys provide objective evidence of the actual operation of the highway network and therefore represent the most reliable basis upon which development impacts should be assessed.

3.3.3 The survey demonstrated that Witt Road accommodates relatively low volumes of vehicular traffic throughout the day. Average weekday traffic volumes recorded within the submitted Transport Statement were approximately:

Period	Two-Way Traffic
AM Peak Hour	16 vehicles
PM Peak Hour	16 vehicles
Average Daily Traffic Approximately 206 vehicles	

These figures confirm that Witt Road functions as a lightly trafficked local access road.

3.3.4 The Highway Authority has not disputed either the methodology or the accuracy of the traffic survey. Indeed, the consultation response broadly accepts the existing traffic environment described within the Transport Statement.

3.4 Existing Traffic Characteristics

3.4.1 Perhaps the most important conclusion arising from the traffic surveys is not simply the number of vehicles using Witt Road but the manner in which traffic is distributed throughout the day. During the busiest weekday hour approximately nineteen vehicles were recorded travelling in both directions.

Expressed differently, this equates to approximately:

One vehicle every 3.2 minutes.

Similarly, during the PM peak period approximately sixteen two-way vehicle movements were recorded, equating to:

One vehicle every 3.8 minutes.

These figures are particularly significant because they demonstrate that opposing vehicle encounters are naturally infrequent.

3.4.2 The Highway Authority repeatedly refers to increased vehicle conflict. However, the consultation response contains no assessment of how frequently vehicles currently meet or how frequently they would be expected to meet following the development. Instead, conflict is assumed rather than quantified.

3.4.3 When traffic volumes are analysed objectively, it becomes evident that vehicles are generally separated by several minutes. Accordingly, opportunities for conflict are inherently limited.

3.5 Driver Behaviour

3.5.1 One aspect almost entirely absent from the Highway Authority's assessment is the influence of driver behaviour upon the operation of rural roads. Drivers naturally modify their behaviour according to the character of the highway upon which they are travelling. On roads such as Witt Road this typically includes:

- lower operating speeds;
- increased observation;
- greater anticipation;
- willingness to give way;
- careful negotiation of opposing traffic.

This adaptive behaviour is entirely normal and is observed daily throughout rural England.

3.5.2 Indeed, it forms one of the reasons why roads that appear substandard when assessed solely against geometric design standards frequently operate with excellent safety records. The Highway Authority's consultation response effectively assumes that every opposing vehicle encounter represents a highway safety concern.

3.5.3 In reality, motorists negotiate such encounters safely and routinely. Occasional yielding or reversing should therefore not be interpreted as evidence that a road is unsafe. Rather, it reflects the established operation of a lightly trafficked rural lane.

3.6 Existing Vehicle Speeds

3.6.1 The automatic traffic survey also established actual vehicle speeds on Witt Road. Recorded 85th percentile speeds were:

Direction	85th Percentile Speed
Northbound	22.8mph
Southbound	20.9 mph

These recorded speeds are noteworthy for several reasons.

- Firstly, they demonstrate that motorists are already responding appropriately to the character of the road.
- Secondly, the recorded speeds are consistent with the posted speed limit.
- Thirdly, low operating speeds significantly reduce the likelihood and severity of collisions.

Lower speeds provide drivers with:

- increased reaction time;
- shorter stopping distances;
- greater opportunity to observe pedestrians;
- improved ability to negotiate opposing traffic.

3.6.2 Accordingly, the measured traffic speeds recorded along Witt Road represent a positive feature of the existing highway environment and are entirely consistent with the road's function as a rural residential lane.

3.6.3 The Highway Authority has raised no technical objection to the speed survey itself and accepts that the proposed visibility splays can be achieved based upon the recorded speeds.

3.7 Existing Passing Opportunities

3.7.1 Whilst sections of Witt Road do not permit two vehicles to pass simultaneously, the consultation response somewhat underestimates the opportunities available to drivers. Along the length of Witt Road motorists may utilise:

- private driveways;
- existing residential accesses;
- frontage openings;
- widened verge areas;
- the formal passing place constructed in connection with Planning Permission PL/2022/07116.

3.7.2 The latter represents a material improvement to the highway network compared with that considered during the previous appeal.

3.7.3 Accordingly, conditions today are demonstrably better than those upon which the Planning Inspector concluded that residential development would not materially affect highway safety. This improvement is afforded little weight within the Highway Authority's consultation response.

3.7.4 Respectfully, it should be regarded as an important material consideration because it directly addresses one of the principal concerns previously expressed regarding the operation of Witt Road.

3.8 Existing Pedestrian Activity

3.8.1 The Highway Authority states that Witt Road is "well used" by pedestrians accessing nearby Public Rights of Way. However, the only quantified pedestrian evidence currently available comprises the surveys undertaken in support of the earlier planning application. Those surveys recorded only:

- 12 pedestrians during one twelve-hour survey period; and
- 15 pedestrians during a second twelve-hour survey period.

3.8.2 Whilst Public Rights of Way undoubtedly generate pedestrian activity, the available survey evidence indicates that pedestrian flows remain relatively modest. This is entirely consistent with the rural character of Winterslow.

3.8.3 Furthermore, the Transport Statement demonstrates that the proposed development would itself generate only a very limited increase in pedestrian movements. Consequently, the probability of interaction between pedestrians and vehicles remains low.

3.8.4 The Highway Authority has not produced any alternative pedestrian survey evidence to suggest otherwise.

3.9 Existing Highway Safety Performance

3.9.1 Ultimately, the best measure of whether a highway operates safely is its actual safety record and this matter is considered in detail within Chapter 4.

3.9.2 However, it is important to note that the available collision data demonstrates an excellent existing safety record despite the physical characteristics of Witt Road. This objective evidence strongly suggests that motorists already adapt successfully to the prevailing highway conditions.

3.9.3 Consequently, whilst Witt Road may not satisfy every aspect of contemporary highway design guidance, it nevertheless performs safely in practice. This distinction is important.

3.9.4 National planning policy does not require every rural road to conform to modern design standards. Rather, the assessment should focus upon actual highway safety performance.

3.10 Existing Conditions Compared with the Highway Authority's Assessment

3.10.1 The Highway Authority correctly describes the physical characteristics of Witt Road. However, its assessment largely omits the equally important operational characteristics of the road. When the available evidence is considered collectively, the following picture emerges:

- Witt Road performs a local access function only.
- Traffic volumes are exceptionally low.
- Vehicle speeds are low.
- Drivers naturally adapt their behaviour.
- Existing passing opportunities are available.
- A formal passing place has recently been constructed.
- Pedestrian activity is relatively modest.
- The highway has an excellent safety record.

3.10.2 These characteristics are entirely consistent with the operation of many rural residential lanes throughout Wiltshire.

3.10.3 Whilst occasional interaction between vehicles is inevitable on such roads, the available evidence demonstrates that these interactions are negotiated safely and do not give rise to significant highway safety concerns.

3.10.4 Accordingly, the existing operation of Witt Road provides a robust baseline against which the relatively modest increase in traffic associated with five additional dwellings should be assessed.

3.11 Chapter Summary

3.11.1 This chapter demonstrates that the Highway Authority's assessment places considerable emphasis upon the physical constraints of Witt Road whilst giving insufficient weight to the road's actual operational performance.

3.1.2 The available evidence establishes that Witt Road is a lightly trafficked rural access lane characterised by low vehicle speeds, modest traffic volumes and responsible driver behaviour. Existing conditions have operated safely over an extended period and have recently been enhanced through the provision of an additional formal passing place.

3.11.3 These objective characteristics provide the appropriate baseline for assessing the proposed development. The following chapter examines the existing highway safety record in greater detail and demonstrates why the collision history provides compelling evidence that the Highway Authority has overstated the likely highway impacts arising from the proposal.

4.0 Highway Safety Assessment

4.1 Introduction

4.1.1 The principal purpose of the Highway Authority is to ensure that new development does not give rise to an unacceptable impact upon highway safety. It follows, therefore, that the assessment of any planning application should be firmly grounded in objective evidence demonstrating whether the existing highway network is operating safely and whether the proposed development would materially alter that position.

4.1.2 Whilst the Highway Authority's consultation response correctly identifies a number of physical characteristics associated with Witt Road, including its restricted carriageway width, absence of formal footways and limited passing opportunities, relatively little weight has been afforded to the existing safety performance of the highway. This is a significant omission.

4.1.3 The most reliable indicator of future highway performance is the established safety record of the existing network. Collision data provides an objective measure of how road users interact under real operating conditions and avoids reliance upon theoretical assumptions regarding possible conflict.

4.1.4 Accordingly, this chapter examines the existing highway safety record, driver behaviour, observed traffic conditions and the previous findings of the Planning Inspector in order to establish whether the Highway Authority's concerns are supported by demonstrable evidence.

4.2 Existing Personal Injury Collision Record

4.2.1 A review of the most recent five-year Personal Injury Collision (PIC) records has been undertaken for Witt Road together with its junction with The Common and Gunville Road.

4.2.2 The review demonstrates that during the entire five-year assessment period there has been only one recorded collision resulting in personal injury within the study area.

4.2.3 That collision occurred in September 2022 on Gunville Road when a vehicle reversed into the carriageway and collided with another passing vehicle, resulting in one slight injury. Importantly, the collision did not occur on Witt Road itself or at the proposed site access.

Equally significant is what the collision record does not show. There have been:

- no personal injury collisions on Witt Road itself;
- no collisions involving pedestrians;
- no collisions involving cyclists;
- no collisions associated with restricted visibility at the proposed access;
- no collisions attributable to the narrow carriageway width.

This represents an exceptionally good highway safety record.

4.3 Significance of the Collision Record

4.3.1 The collision record is one of the strongest pieces of objective evidence available when assessing the suitability of a highway to accommodate additional traffic.

4.3.2 If Witt Road genuinely suffered from the level of vehicle conflict suggested within the Highway Authority's consultation response, it would be reasonable to expect that this would be reflected within the recorded collision history but it is not. Instead, the available evidence demonstrates that despite:

- narrow carriageway widths;
- shared use with pedestrians;
- limited passing opportunities;
- the absence of street lighting;
- the absence of formal footways,

The highway has operated safely over an extended period. This distinction is important.

4.3.4 The Highway Authority's objection is based largely upon the possibility that additional traffic might increase opportunities for conflict. However, the existing collision record demonstrates that the current highway arrangement is functioning safely in practice.

4.3.5 National planning policy requires planning decisions to be evidence-based and the absence of a collision history carries considerably greater evidential weight than theoretical concerns regarding possible future interactions between road users.

4.4 Existing Driver Behaviour

4.4.1 The collision record is consistent with observed driver behaviour on Witt Road. Drivers naturally respond to the rural environment by adapting the manner in which they use the highway. This includes:

- travelling at relatively low speeds;
- maintaining greater forward observation;
- anticipating opposing traffic;
- giving way where appropriate;
- exercising courtesy when meeting other road users.

This adaptive behaviour is entirely typical of rural lanes throughout Wiltshire.

4.4.2 Indeed, it represents one of the reasons why roads which may appear substandard when assessed solely against geometric design criteria frequently exhibit excellent collision records. The Highway Authority's consultation response does not fully acknowledge this important behavioural factor.

4.4.3 Instead, it assumes that increased opportunities for interaction automatically equate to increased highway danger. In reality, the available evidence demonstrates that drivers already negotiate these conditions safely on a daily basis.

4.5 The Difference Between Conflict and Danger

4.5.1 Throughout the consultation response the Highway Authority repeatedly refers to:

- conflict;
- interaction;
- reversing;
- opposing vehicles;
- shared carriageway use.

However, it is important to distinguish between normal interaction and highway danger.

4.5.2 Drivers meeting one another on a narrow rural lane is not an unusual occurrence. Neither is slowing, waiting briefly, or allowing an opposing vehicle to pass.

4.5.3 Such interactions occur daily across the rural highway network and are an accepted consequence of roads that perform a local access function. These interactions should not automatically be characterised as safety hazards. Rather, they represent the normal operation of lightly trafficked rural roads.

4.5.4 Indeed, if every instance of motorists yielding to one another constituted unacceptable highway danger, a substantial proportion of Wiltshire's rural road network would fail to operate safely. The available evidence demonstrates precisely the opposite.

4.5.5 Drivers using Witt Road have successfully negotiated these conditions over many years without generating a poor collision record.

4.6 Measured Traffic Speeds

4.6.1 The recorded speed survey provides further evidence that the existing highway environment is operating appropriately. The seven-day automatic traffic survey recorded 85th percentile vehicle speeds of:

- 22.8 mph northbound
- 20.9 mph southbound

These recorded speeds are entirely consistent with the nature of the road.

4.6.2 More importantly, they demonstrate that motorists are already responding appropriately to the constrained environment. Lower vehicle speeds provide:

- increased reaction time;

- reduced stopping distances;
- greater opportunity to observe pedestrians;
- improved ability to negotiate opposing vehicles;
- significantly reduced collision severity.

4.6.3 Consequently, the measured vehicle speeds contribute positively towards the overall safety performance of Witt Road and are entirely inconsistent with the suggestion that the highway currently operates in an unsafe manner.

4.7 Highway Officer's Reliance on Potential Conflict

4.7.1 A recurring theme throughout the Highway Authority's consultation response is that additional residential traffic would increase opportunities for conflict between vehicles and pedestrians.

4.7.2 Whilst this statement is self-evidently correct in a theoretical sense, it does not follow that the increase would be either material or severe. Indeed, every residential development generates some increase in traffic.

4.7.3 The relevant planning question is therefore not whether interaction increases, but whether that increase gives rise to an unacceptable impact upon highway safety. The consultation response does not quantify:

- how many additional opposing vehicle encounters would occur;
- how frequently vehicles would be required to reverse;
- how many additional pedestrian interactions would arise;
- the probability of conflict occurring;
- the probability of injury arising from any such interaction.

4.7.4 Without such analysis, it is impossible to conclude objectively that the proposal would materially worsen highway safety. Instead, the conclusion relies largely upon general assumptions regarding the consequences of additional traffic.

4.7.5 Respectfully, those assumptions are insufficient to satisfy the evidential threshold established by the National Planning Policy Framework.

4.8 Comparison with the Previous Appeal

4.8.1 The previous Planning Inspector considered many of the same highway issues now raised by the Highway Authority and the Inspector acknowledged that:

- Witt Road is narrow;
- there are no pedestrian footways;
- two vehicles cannot always pass simultaneously.

However, having considered:

- observed traffic conditions;
- pedestrian activity;
- collision history;
- site observations,

the Inspector concluded:

"Witt Road is not to ideal highway standards, being narrow with no street lights for example, but this is not uncommon in rural villages. Furthermore, the lack of accidents recorded in recent years, together with the relatively low level of vehicular or pedestrian trips along Witt Road as demonstrated with the appellant's evidence and my own observations, indicates that this is not a busy or dangerous stretch of highway. It is my conclusion that the low level of additional vehicles likely as a result of the development would not result in this road becoming dangerous or indeed having any discernible impact to highway safety."

4.8.2 These findings are highly significant as the Inspector's conclusions were based upon exactly the same characteristics that the Highway Authority now relies upon as reasons for objection. The difference is that the Inspector considered those characteristics in the context of measured evidence rather than theoretical assumptions.

4.9 Conditions Have Improved Since the Appeal

4.9.1 An important factor not fully reflected within the consultation response is that highway conditions have actually improved since the earlier appeal decision. Following planning permission PL/2022/07116, a formal passing place has been constructed on Witt Road. This passing place:

- provides an additional opportunity for opposing vehicles to pass;
- reduces the likelihood of vehicles having to reverse;
- provides a place of refuge for pedestrians;
- improves the operational efficiency of the road.

4.9.2 Consequently, the current highway environment is demonstrably better than that considered by the Planning Inspector. It is therefore difficult to reconcile the Highway Authority's conclusion that the proposal would now create an unacceptable safety impact when conditions have improved rather than deteriorated.

4.10 The Highway Authority Has Not Demonstrated Harm

4.10.1 The consultation response contains numerous references to:

- increased conflict;
- increased interaction;
- increased reversing;
- increased pedestrian risk.

However, none of these statements are supported by empirical evidence. The Highway Authority has not produced:

- conflict surveys;
- observational studies;
- queue length analysis;
- delay assessments;
- probability assessments;
- collision modelling.

4.10.2 Instead, the objection proceeds upon the assumption that additional traffic necessarily equates to materially reduced highway safety, but the objective evidence does not support that conclusion. Rather, it demonstrates that:

- the highway currently operates safely;
- drivers adapt appropriately;
- collisions are exceptionally rare;
- vehicle speeds are low;
- traffic volumes are low.

4.10.3 Collectively, these factors indicate that the proposal would not fundamentally alter the existing operation of Witt Road.

4.11 Professional Opinion

4.11.1 Having reviewed the collision history, observed traffic conditions, recorded vehicle speeds, previous appeal findings and the Highway Authority's consultation response, it is my professional opinion that the consultation response substantially overstates the likely highway consequences of the proposed development.

4.11.2 There is no evidence before the Local Planning Authority demonstrating that Witt Road currently suffers from a poor safety record.

4.11.3 Nor is there evidence demonstrating that an increase of approximately twenty-five vehicle movements per day would materially alter the existing operation of the highway.

4.11.4 Whilst additional interaction between road users is inevitable, such interaction already occurs safely and routinely throughout the rural highway network.

4.11.5 The available evidence therefore supports the conclusion that the proposal would have only a limited effect upon highway operation and would not give rise to an unacceptable impact upon highway safety.

4.12 Chapter Summary

4.12.1 The objective evidence presented within this chapter demonstrates that Witt Road possesses an excellent highway safety record despite its rural characteristics.

4.12.2 The available collision data, recorded traffic speeds, observed driver behaviour and previous appeal findings consistently indicate that the highway operates safely under existing conditions.

4.12.3 The Highway Authority has identified a number of theoretical concerns regarding future interaction between road users but has not demonstrated, through objective evidence, that those interactions would materially worsen highway safety or result in a severe adverse impact on the transport network in terms of capacity or congestion, including cumulative impacts.

4.12.4 Accordingly, the existing safety performance of Witt Road provides compelling evidence that the proposal would satisfy the highway safety requirements of the National Planning Policy Framework.

5.0 Trip Generation and Traffic Impact

5.1 Introduction

5.1.1 One of the principal considerations when assessing the transport implications of any residential development is the volume of traffic likely to be generated and the ability of the surrounding highway network to safely accommodate that traffic.

5.1.2 The Highway Authority has raised concerns regarding the effect of additional traffic using Witt Road. However, significantly, the consultation response does not dispute the overall level of traffic generation predicted within the submitted Transport Statement.

5.1.3 Instead, the objection rests upon the proposition that a relatively modest increase in vehicle movements would nevertheless give rise to a severe adverse cumulative impact on the transport network due to the existing characteristics of Witt Road.

5.1.4 This chapter demonstrates that the anticipated traffic generation is extremely modest, that it has effectively been accepted by the Highway Authority and that the resulting increase in traffic is insufficient to materially alter the operation of the surrounding highway network.

5.2 TRICS Assessment

5.2.1 The submitted Transport Statement assessed the likely traffic generation associated with the proposed development using the nationally recognised TRICS Version 8 database. Comparison sites were selected using the following principal criteria:

- Residential – Privately Owned Houses;
- Village locations;
- Comparable dwelling numbers;
- Similar settlement characteristics.

The assessment produced the following average trip rates.

Residential Vehicle Trip Rates

Period	Arrivals	Departures	Two-Way Total
AM Peak (08:00–09:00)	0.174	0.367	0.541
PM Peak (17:00–18:00)	0.341	0.138	0.479
Daily	2.475	2.547	5.022

Applying these rates to the proposed five dwellings produces the following traffic generation.

Predicted Traffic Generation

Period	Arrivals	Departures	Two-Way Total
AM Peak	1	2	3
PM Peak	2	1	3
Daily	12	13	25

Accordingly, the proposal is predicted to generate approximately:

- 3 vehicle movements during the AM peak hour;
- 3 vehicle movements during the PM peak hour;
- 25 two-way vehicle movements over an average weekday.

5.2.2 These figures represent an extremely modest level of traffic generation and are entirely consistent with what would normally be expected for a development of five detached dwellings in a rural village location.

5.3 Highway Authority's Response to the TRICS Assessment

5.3.1 The Highway Authority comments that one of the comparison sites included within the TRICS database is located within the Highlands of Scotland and suggests that an alternative geographical selection could have been adopted.

5.3.2 Whilst that observation is acknowledged, it is important to consider the remainder of the Highway Authority's comments. Immediately after criticising the geographical selection, the consultation response states:

"...the suggested daily trip rate of five trips per dwelling would be of the order expected for such a location."

5.3.3 This statement is highly significant as it confirms that the Highway Authority accepts that the overall trip generation predicted within the Transport Statement is realistic. Accordingly, there is no substantive disagreement regarding the quantum of traffic likely to be generated by the proposal.

5.3.4 The discussion therefore moves away from traffic generation and instead becomes one of assessing whether that accepted level of traffic would materially affect highway safety.

5.4 Existing Traffic Flows

5.4.1 The existing traffic survey demonstrates that Witt Road currently accommodates relatively low levels of traffic where average weekday flows were recorded as:

Period	Existing Two-Way Traffic
AM Peak	16 vehicles
PM Peak	16 vehicles

These figures equate to:

- approximately one vehicle every 3.2 minutes during the busiest morning hour; and
- approximately one vehicle every 3.8 minutes during the busiest evening hour.

5.4.2 Against this existing baseline, the proposed development would generate only three additional vehicle movements during each peak period. Consequently, traffic conditions following the development would become:

Period	Existing	Proposed	Total
AM Peak	19	3	22
PM Peak	16	3	19

This represents an increase of only:

- 15.8% during the AM peak hour;
- 18.8% during the PM peak hour.

Whilst any development inevitably increases traffic to some extent, these increases remain modest in absolute terms. More importantly, the resulting traffic volumes remain exceptionally low.

5.5 Practical Effect on Highway Operation

5.5.1 The Highway Authority repeatedly refers to an increase in traffic but does not explain what this means in practical terms. When expressed as actual vehicle spacing, the effect becomes much easier to understand.

Existing Conditions

- AM Peak – one vehicle every 3.2 minutes
- PM Peak – one vehicle every 3.8 minutes

With the Proposed Development

- AM Peak – one vehicle every 2.7 minutes
- PM Peak – one vehicle every 3.2 minutes

5.5.2 Accordingly, even following the development, motorists would still typically encounter fewer than one vehicle every three minutes. These are exceptionally low traffic flows, and such volumes are entirely consistent with the continued safe operation of a lightly trafficked rural lane.

5.6 Comparison with Previously Approved Development

5.6.1 Planning permission has already been granted for three dwellings immediately adjoining the application site under Planning Permission PL/2022/07116 and applying the same TRICS methodology indicates that the approved development would be expected to generate approximately:

Period	Two-Way Trips
AM Peak	2
PM Peak	2
Daily	15

The current proposal therefore generates only:

Period	Additional Trips Compared with Approved Scheme
AM Peak	1
PM Peak	1
Daily	10

This comparison is particularly important.

5.6.2 The Highway Authority repeatedly refers to a "step change" in traffic activity, however, the actual difference between the previously accepted three-dwelling scheme and the current proposal amounts to:

- approximately one additional vehicle movement during each peak hour; and
- approximately ten additional vehicle movements across an entire weekday.

Respectfully, this cannot reasonably be characterised as a "step change" in highway activity.

5.7 Assessment of Traffic Impact

5.7.1 The Highway Authority accepts that the proposal will generate approximately twenty-five vehicle movements across an average weekday. When considered objectively, this equates to:

- approximately twelve arriving vehicles;
- approximately thirteen departing vehicles;
- movements distributed across a twelve to sixteen-hour period.

In practical terms this represents approximately:

- one arriving vehicle every hour;
- one departing vehicle every hour.

Such traffic generation is extremely modest.

5.7.2 The consultation response does not identify any capacity problems at the junction of Witt Road with The Common, nor does it identify any operational modelling demonstrating unacceptable delay or congestion. Instead, the objection rests upon the assumption that these additional movements will increase opportunities for interaction between road users.

5.7.3 Whilst that proposition is self-evidently correct, the crucial issue is whether those interactions become sufficiently frequent or hazardous to result in an unacceptable impact on highway safety, or whether the traffic effects would amount to a severe adverse impact on the transport network in terms of capacity or congestion, including cumulative impacts, as required by NPPF Policy TR6(4). The available evidence demonstrates that they would not.

5.8 Traffic Generation Compared with Existing Highway Performance

5.8.1 The objective evidence now available demonstrates:

- the Highway Authority accepts the predicted trip generation;
- the proposal generates only three peak-hour movements;
- daily traffic increases by only approximately twenty-five vehicle movements;
- existing traffic flows remain exceptionally low;
- vehicle speeds remain low;
- collision history remains excellent.

5.8.2 Taken together, these factors demonstrate that the proposed development would not fundamentally alter the operation of Witt Road. The road would continue to function as a lightly trafficked rural access lane.

5.8.3 Whilst occasional interaction between vehicles would inevitably increase slightly, the overall operational characteristics of the highway would remain substantially unchanged.

5.9 Professional Opinion

5.9.1 From a transport planning perspective, the predicted traffic generation associated with the proposal is exceptionally modest. The Highway Authority has effectively accepted the traffic forecasts contained within the Transport Statement and has produced no alternative assessment suggesting that greater levels of traffic would occur. The principal issue therefore becomes one of proportionality.

5.9.2 It is difficult to conclude that approximately three additional vehicle movements during the busiest hour of the day could materially alter the operation of a road currently accommodating fewer than twenty vehicles during that same period.

5.9.3 The evidence instead indicates that the proposal would result in only a marginal increase in traffic whilst preserving the existing operational characteristics of Witt Road.

5.10 Chapter Summary

5.10.1 The submitted TRICS assessment demonstrates that the proposed development would generate only approximately twenty-five two-way vehicle movements across an average weekday. Importantly, this level of traffic generation has effectively been accepted by the Highway Authority.

5.10.2 When considered against existing traffic flows, the proposal would result in only a modest increase in vehicle activity that would not materially alter the operation of Witt Road. Accordingly, the available evidence demonstrates that the anticipated traffic generation is entirely compatible with the continued safe and efficient operation of the surrounding highway network.

6.0 Technical Response to the Highway Authority's Consultation Response

6.1 The Highway Authority's consultation response raises a number of concerns regarding the operation of Witt Road, principally relating to its restricted carriageway width, the absence of formal pedestrian footways, the potential for opposing vehicles to encounter one another and the cumulative effect of recently approved and proposed residential development. Whilst these concerns are acknowledged, it is respectfully submitted that they are founded largely upon the physical characteristics of the highway rather than upon objective evidence demonstrating that the proposal would materially prejudice highway safety.

6.2 The preceding chapters of this report have established that Witt Road currently operates as a lightly trafficked rural access lane characterised by low vehicle speeds, modest traffic volumes and an excellent highway safety record. Furthermore, the Highway Authority has accepted the predicted traffic generation associated with the proposal and has not challenged the submitted speed survey, visibility assessment or accident analysis. The principal issue for consideration is therefore whether the modest increase in traffic associated with five dwellings would fundamentally alter the manner in which Witt Road currently operates. In the Applicant's opinion, the available evidence demonstrates that it would not.

6.3 The Highway Authority correctly identifies that Witt Road is narrower than would be expected for a modern residential estate road and that opportunities for opposing vehicles to pass are limited in places, but these are existing characteristics of the highway and have existed for many years. They are also entirely typical of many rural lanes throughout Wiltshire and elsewhere in England. Importantly, the existence of these characteristics does not, in itself, demonstrate that the road operates unsafely or that further residential development is unacceptable.

6.4 Road users naturally adapt their driving behaviour to suit the environment in which they are travelling. On rural lanes such as Witt Road this includes reduced speeds, greater forward observation and a willingness to give way to opposing traffic where appropriate. The seven-day traffic survey confirms that drivers are already travelling at relatively low speeds, whilst the five-year Personal Injury Collision review demonstrates that these operating characteristics have resulted in an excellent highway safety record. The consultation response does not identify any evidence suggesting that the existing width restrictions have resulted in an abnormal pattern of collisions or highway safety concerns.

6.5 Similarly, the Highway Authority places considerable emphasis upon the need for vehicles to occasionally wait or reverse to allow opposing traffic to pass. Whilst this may occur from time to time, it is respectfully submitted that such manoeuvres are entirely normal on rural lanes and should not automatically be regarded as evidence of highway danger. Drivers routinely negotiate these situations through courtesy and observation. The consultation response does not provide any survey evidence demonstrating how often such manoeuvres currently occur, nor does it quantify how frequently they would increase following the development. Instead, it assumes that any increase in interaction between vehicles necessarily equates to a deterioration in highway safety. That assumption is not supported by the available evidence.

6.6 The Highway Authority also expresses concern regarding pedestrians using the carriageway because formal footways are absent. Again, this characteristic is typical of many rural settlements and has existed throughout the lifetime of Witt Road. Previous pedestrian surveys demonstrate that pedestrian activity remains relatively low, whilst the recorded collision history confirms that no pedestrian injury collisions have occurred within the study area during the five-year review period. These objective findings suggest that motorists and pedestrians currently coexist safely despite the physical characteristics of the road. Furthermore, the proposed development would generate only a limited increase in pedestrian activity, which would be spread throughout the day and would not materially alter the existing relationship between pedestrians and vehicles.

6.7 Considerable weight is also placed upon the cumulative effect of the proposal when considered alongside recently approved development. This matter has been examined in detail in Chapter 5. The accepted TRICS assessment demonstrates that the proposal would generate approximately twenty-five two-way vehicle movements during a typical weekday, with only three additional vehicle movements occurring during each peak hour. Even when considered cumulatively with the approved three-dwelling development, peak-hour traffic would remain exceptionally low, and vehicles would continue to be separated by intervals measured in minutes rather than seconds. The Highway Authority has characterised this increase as a "step change" in highway activity; however, no quantified assessment has been undertaken to demonstrate why this modest increase should be regarded as fundamentally altering the operation of Witt Road.

6.8 An equally important consideration is that the operational characteristics of Witt Road have improved since the previous appeal relating to adjoining land. A formal passing place has now been constructed as part of Planning Permission PL/2022/07116, providing additional opportunities for opposing vehicles to pass safely and reducing the likelihood of vehicles needing to reverse. This improvement was not available to the Planning Inspector when the previous appeal was determined, yet the Inspector nevertheless concluded that the additional traffic associated with residential development would not result in the road becoming dangerous or have any discernible impact upon highway safety. It is therefore difficult to reconcile the Highway Authority's current conclusion with the findings of the Planning Inspector, particularly when highway conditions have since improved rather than deteriorated.

6.9 Having considered the consultation response in detail; it is evident that the Highway Authority has identified a number of existing characteristics of Witt Road rather than demonstrating that the proposed development would materially worsen those conditions. The objection relies heavily upon the theoretical possibility of increased interaction between vehicles and pedestrians but provides no quantified assessment of the frequency, severity or consequences of those interactions. In contrast, the Applicant has submitted measured traffic data, speed surveys, collision analysis and trip generation forecasts, all of which consistently indicate that the proposal would introduce only a modest increase in traffic on a road that has an established history of operating safely.

6.10 Accordingly, it is respectfully submitted that the available evidence does not support the conclusion that the proposal would result in either an unacceptable impact upon highway safety or a severe adverse impact upon the local transport network in terms of capacity or congestion, including cumulative impacts.

7.0 Previous Appeal Decision and Material Planning History

7.1 Introduction

7.1.1 An important material consideration in the determination of the current application is the planning history relating to adjacent land on Witt Road and, in particular, the findings of the Planning Inspector who considered many of the same highway issues now raised by the Local Highway Authority.

7.1.2 Whilst every planning application must be determined on its own merits, previous appeal decisions are capable of attracting significant weight where they relate to the same site, the same highway network and substantially the same technical issues. In this instance, the appeal decision relating to Planning Application PL/2022/07116 is particularly relevant because the Inspector undertook a detailed assessment of the characteristics of Witt Road, the existing traffic conditions, pedestrian activity and the likely highway implications arising from additional residential development.

7.1.3 The Inspector's conclusions provide an independent assessment of the operation of Witt Road and therefore represent an important benchmark against which the current Highway Authority consultation response should be considered.

7.2 Matters Considered by the Planning Inspector

7.2.1 The Inspector considered a number of issues which closely mirror those now raised within the Highway Authority's consultation response. These included:

- the restricted carriageway width of Witt Road;
- the absence of formal pedestrian footways;
- the need for opposing vehicles to give way to one another;
- pedestrian access to the surrounding Public Rights of Way network;
- existing traffic levels;
- highway safety.

Accordingly, the appeal addressed precisely the matters that now form the basis of the Highway Authority's recommendation that planning permission should be refused.

7.2.2 This is important because it demonstrates that the current concerns are not new issues arising from the present proposal but longstanding characteristics of the highway which have already been subject to independent examination.

7.3 The Inspector's Findings

7.3.1 Having undertaken a site visit and reviewed the submitted technical evidence; the Planning Inspector reached the following conclusion:

"Witt Road is not to ideal highway standards, being narrow with no street lights for example, but this is not uncommon in rural villages. Furthermore, the lack of accidents recorded in recent years, together with the relatively low level of vehicular or pedestrian trips along Witt Road as demonstrated with the appellant's evidence and my own observations, indicates that this is not a busy or dangerous stretch of highway. It is my conclusion that the low level of additional vehicles likely as a result of the development would not result in this road becoming dangerous or indeed having any discernible impact to highway safety."

7.3.2 This passage is particularly significant because the Inspector accepted that Witt Road possesses physical characteristics that differ from those expected of a modern estate road. However, rather than relying upon geometry alone, the Inspector considered those characteristics in the context of the measured traffic flows, pedestrian activity, collision history and direct observations made during the site visit.

7.3.3 The conclusion reached was that the road was neither busy nor dangerous and that the modest increase in residential traffic would not materially affect highway safety.

7.4 Comparison with the Current Highway Authority Position

7.4.1 The Highway Authority's current consultation response identifies many of the same physical characteristics that were previously before the Planning Inspector, namely the restricted carriageway width, the absence of formal footways and the interaction between vehicles and pedestrians. However, the conclusions now reached differ markedly from those of the Inspector.

7.4.2 Importantly, the Highway Authority has not identified any fundamental change in the characteristics of Witt Road since the appeal was determined. Indeed, the available evidence demonstrates that:

- recorded vehicle speeds remain low;
- traffic volumes remain modest;
- the Personal Injury Collision record remains excellent;
- the proposed development would generate only a limited number of additional vehicle movements.

Accordingly, the factual circumstances underpinning the previous appeal decision remain substantially unchanged.

7.5 Highway Conditions Have Improved

7.5.1 If anything, the operation of Witt Road has improved since the appeal decision. As part of Planning Permission PL/2022/07116, a formal passing place has been constructed to facilitate the movement of opposing vehicles. This additional infrastructure provides:

- an improved opportunity for vehicles to pass;
- reduced likelihood of reversing manoeuvres;
- greater operational flexibility;
- an additional refuge area for pedestrians where necessary.

Consequently, the current highway environment is demonstrably better than that considered by the Planning Inspector.

7.5.2 This is a material consideration because it would be difficult to conclude that a highway which has since been improved is now incapable of safely accommodating a similarly modest level of residential traffic.

7.6 Weight to be Given to the Appeal Decision

7.6.1 Whilst appeal decisions do not create binding precedent, they are nevertheless important material considerations, particularly where they relate to the same location and substantially the same planning issues. The Inspector's decision represents an independent assessment undertaken after considering:

- detailed technical evidence;
- the Highway Authority's concerns;
- site observations;
- the existing operation of Witt Road.

In the absence of any material change in circumstances, considerable weight should be afforded to those findings.

7.6.2 If the Local Planning Authority is now minded to depart from the Inspector's conclusions, it should clearly explain what new evidence has emerged to justify reaching a different conclusion. Respectfully, no such evidence has been identified.

7.7 Current Live Planning Application for 2 Dwellings

7.7.1 Wiltshire Council is currently considering Planning Application PL/2025/10022 relating to the erection of two detached dwellings to the north of this site to the north. The proposal utilises the access previously approved under planning permission PL/2022/07116 and therefore relies upon the same section of Witt Road that serves the current application.

7.7.2 In assessing that proposal, the Highway Development Management Engineer expressly acknowledged that Witt Road remains a narrow carriageway without footways or street lighting and recognised the Authority's previous concerns regarding its suitability. However, having regard to the appeal decision, the provision of the approved passing place and the limited number of additional vehicle movements generated, the Highway Authority concluded that the proposal would not give rise to unacceptable highway safety impacts and recommended that no highway objection be raised.

7.7.3 This represents an important material consideration as the physical characteristics of Witt Road have not materially changed since the submission of the current application. The Highway Authority has therefore accepted, in principle, that additional residential development can safely be accommodated from Witt Road where traffic generation remains modest.

7.7.4 When considered alongside the Appeal Inspector's findings, the corrected traffic survey demonstrating average daily traffic flows of only 206 vehicles, the extremely low pedestrian activity, the absence of any pedestrian injury collisions, and the provision of the approved passing place, it is difficult to reconcile an objection to the current proposal on highway safety grounds.

7.8 Conclusions

7.8.1 The previous appeal decision provides compelling support for the current proposal. The Planning Inspector expressly acknowledged the physical limitations of Witt Road, including its restricted width and absence of footways, yet nevertheless concluded that the road was neither busy nor dangerous and that the modest increase in residential traffic would have no discernible impact upon highway safety. Those findings remain directly applicable to the current proposal.

7.8.2 Indeed, highway conditions have improved through the provision of a formal passing place, whilst the submitted Transport Statement and this rebuttal provide additional evidence confirming the low levels of traffic, low vehicle speeds and excellent safety record associated with Witt Road.

7.8.3 Accordingly, the previous appeal decision should be afforded significant weight in the determination of the current application and provides strong independent support for the conclusion that the proposed development would not result in either an unacceptable impact upon highway safety or a severe adverse impact on the transport network, including cumulative impacts.

7.8.4 Additionally, Since preparation of this rebuttal, the Highway Authority has considered a further planning application for two dwellings immediately adjoining the appeal site and has raised no highway objection, expressly concluding that the proposal would not be unacceptable in highway safety terms. This represents further evidence that the Authority now accepts that limited residential development can safely be accommodated from Witt Road.

8.0 Compliance with National and Local Planning Policy

8.1 Introduction

8.1.1 The Highway Authority has recommended refusal on the basis that the proposal would result in an unacceptable impact upon highway safety and that the cumulative impact upon the local highway network would be severe.

8.1.2 Those conclusions must be considered against the relevant planning policy framework, comprising the National Planning Policy Framework (NPPF) together with the transport policies contained within the Wiltshire Core Strategy.

Importantly, the August 2026 NPPF replaces the former paragraph-based transport tests with national decision-making policies. The relevant policies are TR3, TR4 and, most importantly for the Highway Authority's objection, TR6. The purpose of this chapter is therefore to assess the proposal against those current policy requirements.

8.1.3 The recommendation of the Local Highway Authority is not, in itself, determinative of the application. The planning decision must ultimately be taken by the Local Planning Authority having regard to the development plan and other material considerations, including the August 2026 National Planning Policy Framework. The Highway Authority's concerns must therefore be assessed against the current national decision-making policies, particularly TR6, rather than the superseded paragraph 116 test.

8.2 National Planning Policy Framework

8.2.1 The National Planning Policy Framework published in August 2026 replaces the December 2024 Framework and introduces a restructured set of national decision-making policies. Transport is addressed in Chapter 15, with Policies TR3 to TR8 applying directly to development proposals.

8.2.2 Policy TR3: Locating development in sustainable locations requires significant adverse impacts on the transport network or highway safety to be mitigated to an acceptable degree using a vision-led approach. Importantly for this rural site, TR3(1)(e) recognises that in rural areas opportunities to improve walking, wheeling, cycling and public transport should be taken where they exist and can be supported by the development proposed.

8.2.3 Policy TR4: Street design, access and parking requires transport considerations to be integral to design and seeks safe, inclusive and attractive routes, including measures to minimise the scope for conflict between pedestrians, cyclists and vehicles. The proposed access, visibility, parking and turning arrangements have been assessed against the actual characteristics and measured speeds of Witt Road and the Highway Authority accepts that appropriate visibility can be achieved.

8.2.4 Policy TR6: Assessing transport impacts provides the principal decision-making test relevant to the Highway Authority's objection.

- TR6(3) requires movement patterns and potential impacts, including whether they are severe, to be assessed against reasonable future scenarios, taking account of impacts at relevant times of day, potential cumulative impacts, multimodal trip generation and the promotion of sustainable modes of travel.
- TR6(4) states that development proposals should be refused where they would have a severe adverse impact on the transport network, in terms of capacity and congestion including cumulative impacts, or an unacceptable impact on highway safety, taking account of mitigation measures and wider network improvements.

The August 2026 wording is therefore more specific than the former paragraph 116 test. In particular, the 'severe' limb is expressly directed to the transport network in terms of capacity and congestion, including cumulative impacts. The evidence in this rebuttal demonstrates no capacity constraint, congestion, queueing or material delay arising from the proposal.

8.2.5 The policy does not establish that any increase in traffic, interaction between road users or occasional need for vehicles to give way is sufficient to justify refusal. The question remains whether the evidenced effects reach the specific TR6(4) thresholds.

8.3 Unacceptable Highway Safety

8.3.1 The first TR6(4) test concerns whether the proposal would create an unacceptable impact upon highway safety. The evidence presented within this rebuttal demonstrates that this threshold has not been met. Specifically:

- the proposed access achieves the required visibility splays based upon measured vehicle speeds;
- the Highway Authority accepts that appropriate visibility can be achieved;
- recorded 85th percentile speeds are below 30 mph;
- Witt Road carries relatively low traffic flows;
- the proposal would generate only around 25 additional vehicle movements per day;

- there have been no recorded personal injury collisions on Witt Road during the five-year review period;
- no pedestrian injury collisions have been recorded;
- no collisions have been attributed to the width of the carriageway or the absence of footways.

Collectively, this evidence demonstrates that the existing highway network operates safely and that the proposal would not materially alter those operating conditions.

8.3.2 Whilst the Highway Authority has expressed concerns regarding increased interaction between vehicles and pedestrians, no objective evidence has been presented to demonstrate that such interaction would give rise to an unacceptable impact on highway safety. The evidence therefore indicates that the highway safety test in Policy TR6(4) is not engaged.

8.4 Severe Adverse Impact on the Transport Network

8.4.1 The second TR6(4) test is whether the proposal would have a severe adverse impact on the transport network in terms of capacity and congestion, including cumulative impacts. The evidence presented within this report demonstrates that this threshold has not been reached.

8.4.2 The Highway Authority accepts that the proposal would generate approximately twenty-five vehicle movements across an average weekday. That equates to:

- approximately three additional vehicle movements during each peak hour;
- approximately one additional vehicle every twenty minutes during the busiest periods;
- approximately one arrival and one departure each hour throughout the day.

When assessed against existing traffic flows, these movements are extremely modest.

Even following the development:

- traffic volumes remain low;
- vehicles remain widely spaced;
- the operational characteristics of Witt Road remain substantially unchanged;
- no junction capacity issues arise;
- no queues are predicted;
- no delays have been identified.

8.4.3 Policy TR6(3) expressly requires potential cumulative impacts and reasonable future scenarios to be considered. This rebuttal has done so, including the approved and proposed residential development served from Witt Road. Importantly, the Highway Authority has undertaken no quantitative assessment demonstrating why the resulting traffic conditions would amount to a severe adverse impact in terms of capacity or congestion.

- No capacity assessment has been produced.
- No conflict analysis has been undertaken.
- No delay modelling has been prepared.
- No operational assessment has been submitted.

Instead, the conclusion that the cumulative impacts would be severe is founded principally upon assumptions regarding interaction between road users. That is not the same as demonstrating the severe adverse capacity or congestion impact identified by TR6(4), and the objective traffic evidence does not support such a conclusion.

8.5 Wiltshire Core Strategy

8.5.1 The proposal is equally consistent with the transport objectives of the Wiltshire Core Strategy. The purpose of the transport policies is to ensure that development:

- provides safe and suitable access;
- does not prejudice highway safety;
- can be accommodated by the surrounding highway network;
- promotes sustainable patterns of development.

The proposal satisfies each of these objectives.

- Safe vehicular access can be achieved.
- Visibility splays accord with measured vehicle speeds.
- Parking and turning facilities are provided within the site.
- The surrounding highway network has demonstrated its ability to operate safely.

Furthermore, the proposal represents a modest extension to existing residential development within the village rather than isolated development in the open countryside.

8.6 Proportionality

8.6.1 An important principle running throughout both national and local planning policy is proportionality. The planning system recognises that development inevitably creates some additional traffic.

8.6.2 Similarly, rural roads are not expected to operate to the same geometric standards as urban distributor roads. The Highway Authority's assessment places considerable emphasis upon the physical limitations of Witt Road but gives comparatively little weight to:

- the measured traffic data;
- the recorded vehicle speeds;
- the excellent collision record;
- the previous Planning Inspector's findings;
- the recently constructed passing place;
- the exceptionally modest level of traffic generated by the proposal.

Planning policy requires all of these factors to be considered together.

8.6.3 When they are considered collectively, the evidence points consistently towards a highway network that functions safely and would continue to do so following the development.

8.7 Overall Policy Compliance

8.7.1 Having regard to the evidence presented throughout this rebuttal, it is respectfully submitted that the proposal accords with the relevant transport policies contained within the August 2026 National Planning Policy Framework, in particular Policies TR3, TR4 and TR6, together with the Wiltshire Core Strategy.

8.7.2 The proposed development would introduce only a modest increase in residential traffic onto a lightly trafficked rural lane that already operates safely.

8.7.3 No objective evidence has been presented demonstrating that highway safety would become unacceptable.

8.7.4 Similarly, no technical evidence has been provided demonstrating that the proposal would have a severe adverse impact on the transport network in terms of capacity or congestion, including cumulative impacts.

8.7.5 Accordingly, neither of the refusal tests in Policy TR6(4) is satisfied. The evidence does not demonstrate an unacceptable impact on highway safety or a severe adverse impact on the transport network in terms of capacity or congestion, including cumulative impacts. There is therefore no transport policy basis within the current NPPF for refusing the proposal.

9.0 Summary and Conclusions

9.1 This Highway Technical Rebuttal has been prepared in response to Wiltshire Council Highway Authority's consultation response dated 30 June 2026 in relation to planning application PL/2026/03223.

9.2 The Highway Authority's objection is founded principally upon the contention that the proposed development would increase opportunities for interaction between vehicles and pedestrians along Witt Road and that, when considered cumulatively with other recent development, those impacts would become severe.

9.3 This report has carefully reviewed each element of that assessment against measured traffic data, recorded vehicle speeds, Personal Injury Collision records, the submitted Transport Statement, the previous Planning Inspector's decision and the relevant provisions of the National Planning Policy Framework.

9.4 The evidence demonstrates that Witt Road currently functions as a lightly trafficked rural access lane characterised by low traffic speeds, modest traffic volumes and an excellent highway safety record. Although the road possesses physical characteristics that differ from those expected of a modern estate road, those characteristics have existed for many years and motorists have demonstrably adapted their behaviour accordingly. The recorded collision history confirms that the highway continues to operate safely despite its constrained geometry.

9.5 The Highway Authority has accepted the level of traffic generation predicted within the submitted TRICS assessment. The proposal is expected to generate only approximately twenty-five two-way vehicle movements during an average weekday, including only three additional vehicle movements during each peak hour. Such increases are modest in absolute terms and would not materially alter the existing operation of Witt Road.

9.6 The report has also demonstrated that the Highway Authority's conclusions are difficult to reconcile with the findings of the Planning Inspector who previously considered substantially the

same highway characteristics and concluded that Witt Road was neither busy nor dangerous and that a modest increase in residential traffic would have no discernible impact upon highway safety. Since that appeal was determined, highway conditions have improved through the provision of a formal passing place, further enhancing opportunities for opposing vehicles to pass safely.

9.7 Whilst the Highway Authority has identified a number of theoretical concerns regarding increased interaction between road users, no quantified evidence has been presented to demonstrate that those interactions would result in an unacceptable impact upon highway safety or a severe adverse impact on the transport network in terms of capacity or congestion, including cumulative impacts.

9.8 Since the submission of the original Transport Statement, two important material considerations have emerged. Firstly, corrected traffic survey data confirms that Witt Road carries only approximately 206 two-way vehicle movements per day, substantially fewer than previously understood. Secondly, the Highway Authority has considered Planning Application PL/2025/10022 for two additional dwellings immediately to the north of this site and has concluded that no highway objection should be raised.

9.9 These developments materially reinforce the conclusions reached within this report. The available evidence now demonstrates that Witt Road carries exceptionally low traffic volumes, continues to operate safely despite its physical constraints and is capable of accommodating modest additional residential traffic without giving rise to either an unacceptable highway safety impact or a severe adverse impact on the transport network under Policy TR6(4) of the August 2026 NPPF.

Accordingly, it is respectfully submitted that there are no sustainable highway or transportation grounds upon which planning permission should be refused.

Nick Culhane August 2026