National Highways Planning Response (NHPR 21-09)
Formal Recommendation to an Application for Planning Permission

From: Regional Director, South West Operations Division, National Highways
planningsw@nationalhighways.co.uk

To: Wiltshire Council
FAO Jonathan Maidman

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

Council's Reference: PL/2023/05618

Location: Keysley Farm, Monkton Deverill, BA12 7EY

Proposal: Variation of condition 4 on W/08/00931/FUL to remove the agricultural storage restriction placed upon units A and B in order to utilise them for any purposes within Use Class B8 'Storage'

National Highways Reference: NH/23/01852

Referring to the consultation on a planning application referenced above, in the vicinity of the A303 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

a) offer no objection (see reasons at Annex A);

~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~

~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~

~~d) recommend that the application be refused (see reasons at Annex A)~~

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

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

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

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

Signature: G Gallacher **Date:** 20 July 2023

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

Annex A National Highway's assessment of the proposed development

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

We have undertaken a review of the relevant documents supporting the planning application to ensure compliance with the current policies of the Secretary of State as set out in DfT Circular 01/2022 "*The Strategic Road Network and the Delivery of Sustainable Development*" and the National Planning Policy Framework (NPPF). This response represents our formal recommendations with regards to planning application reference PL/2023/05618.

Reasons

The Proposal

The application is seeking consent to vary condition 4 of permission reference W/08/00931/FUL which states that '*The B8 floorspace hereby permitted shall be used for agricultural storage purposes only, with any variation to the use to be approved in writing by the Local Planning authority in consultation with the Secretary of State for Transport. REASON: To limit the impact of heavy goods vehicles on the A303*.'

The application proposes to amend the wording of the condition to read '*The floorspace hereby permitted shall be used for B8 purposes only, with any variation to the use to be approved in writing by the LPA.'*

Background

The condition relates to the use of 2 barns within the wider Keysley Farm complex, identified as units A and B in the application documents totalling around 5300sqm of floorspace. We understand that the need for the proposal is to support farm diversification and the ongoing viability of the agricultural business. The development site utilises an existing direct access from the A303 trunk road, which in this location is single carriageway and subject to the national speed limit. The applicant previously submitted an application to vary conditions for two other barns on the site, identified as barns C and D, to also allow for general B8 storage.

Unfortunately National Highways has been unable to find a record of a consultation in respect of the original 2008 application, nor our planning response so cannot offer a view as to the justification at that time for the condition restriction. However, it is noted that we have subsequently offered no objections in relation to other later applications associated with the wider Keysley Farm site.

Assessment of traffic impact

A transport statement has been provided prepared by Paul Basham Associates which quantifies the existing movements associated with the barns based on information provided by the applicant, compared to potential trip generation for B8 use derived from TRICS for a similar sized site in a rural location. This predicts 4 two-way movements in the am peak hour which would replace an assumed one am peak hour trip generated by the existing grain store use. The trip rate that has been applied has not been made clear and is therefore not accepted by us. We have therefore compared the potential trip generation by applying a more generic B8 trip rate which suggests a potential for up to 13 peak hour 2-way movements, but which we accept in this case would be overly robust. The rural location of the site is acknowledged and it is also noted that the barns sit within the context of a wider existing farm complex that could generate uncontrolled agricultural vehicle movements which would be likely to be large and slow moving in nature. On balance we therefore consider that the vehicle movements associated with B8 uses are unlikely to be materially different to those which could be generated by the existing uncontrolled agricultural use.

We have also undertaken a review of collision information over the last 5 years for which data is available in relation to the 3 injury collisions identified as occurring on the A303 in proximity to the development site access. Of these, 2 were associated with the use of the access and involved shunt-type collisions with vehicles travelling westbound and waiting to turn right from the A303 into the development site but it is unclear what existing use on site was associated with these turning movements (ie farm traffic or the events venue at Keysley). The third collision occurred on the eastbound carriageway and does not appear to be associated with use of the access junction. Whilst any collision is obviously a concern to us, the collision history is unlikely in this case to be sufficient to sustain an objection to the proposals on highway safety grounds. An advance junction warning sign is already in place on the A303 westbound carriageway, however the applicant may wish to consider whether their own existing Keysley Farm signage remains suitable or sufficient.

We have also considered the shared use of the access with the events venue which also forms part of the wider Keysley Farm site. However, we are satisfied these trips will occur primarily outside of traditional network peak hours, and the likely peak hours for movements associated with B8 storage uses.

Summary

Therefore on balance we consider that the proposed variation to permit B8 use in barns A and B, given the rural nature of the location and in the context of the existing permitted uses on the wider site, is unlikely to represent a material change to the volume or nature of vehicle trips such that would sustain National Highways in objecting to the proposed condition variation on grounds of either an unacceptable or severe impact in safety or capacity terms, in accordance with current policy.

We would however recommend an addition to the proposed condition wording to provide for consultation with the strategic highway authority should any further

change to the use class be sought, which could result in a greater impact on the number of vehicle movements at the A303 access.

The applicant may also wish to give consideration to the suitability and sufficiency of their existing on-site signage.

Recommendation

National Highways recommends that any variation to condition 4 of permission W/08/00931/FUL that the planning authority is minded to grant in respect of application PL/2023/05618 should be amended to the effect that:

The floorspace hereby permitted shall be used for B8 purposes only, with any variation to the use to be approved in writing by the local planning authority (who shall consult with the strategic highway authority).

Reason: in the interest of the safe and efficient operation of the A303 trunk road.

Standing advice to the local planning authority

The Climate Change Committee's 2022 Report to Parliament notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of PAS2080 promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

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