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Food Converters Limited

PROPOSED RESIDENTIAL DEVELOPMENT COMPRISING 4 ECO DWELLINGS AND WOODLAND MEMORIAL PARK CHURCH ROAD HEYWOOD WESTBURY WILTSHIRE BA13 4LP



TRANSPORT STATEMENT

Technical Report 17548/1B
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Introduction

1. This Transport Statement (TS) supports a planning application submitted by Food Converters Limited to Wiltshire Council (the Council) for a mixed use development on land on the north side of Church Road, Heywood. The site is located within the village which is best described as being linear in nature with the greater part of the village south of Church Road and sporadic development on the north side. Development has been approved by the Council on both sides of Church Road at its eastern end including a small development of four homes adjacent to the village hall.
2. The current proposal is for a small residential development of four eco dwellings plus an adjacent area of 3 acres of land for a memorial park / woodland for Queen Elizabeth II. This is to replace the extant consent on the site which represents the "*fall back*" position.
3. There is a detailed planning history to the site though by any reasonable interpretation of the history, there has to be an acknowledgement that the site has the benefit of an extant and implemented consent for both the site access, and the sports fields. The contentious issue historically has been the residential development element of the various planning applications.
4. Planning application W96/1460 as varied by planning application W98/0187 was approved for a sports pitch on the land plus the access to the site as planning application W96/1460, and a variation to the access as planning application W98/0187. Planning application, W96/1460, as shown in detail on drawing 424/1 being for a football pitch with a cricket square for summer use, a childrens' play area, car parking for a total of 17 vehicles and the vehicular access onto Church Road. The second condition attached to W98/0187 makes it clear that the permission:

   > *"shall relate solely to the construction of an alternative access to the sports pitch previously permitted on 5 June 1997 under reference W96/1460. For the avoidance of doubt, it does not grant permission, not does it imply that permission will be granted for any other development proposal indicated on the submitted drawing."*

5. The permission as such solely related to the football pitch, the chlidrens' play area, parking and the site access. This represents the "*fall back*" use as it is an implemented consent which has been constructed in part as the site access is in situ. Where there is a valid "*fall back*" position or use it can be used to "*net off"* the proposal's impact. The difference to be assessed in this TS is that between the two scenarios namely the

deletion of the sports playing field, and its replacement by a Queen Elizabeth II Memorial Park, which it is opined as detailed subsequently in this TS is likely to be a significantly lower traffic generator than the sports pitch. In addition, there is the impact of four detached eco dwellings. It will be demonstrated in this TS that there is likely to be none other than a "*de minimis*" level of net impact due to the memorial park and the residential development combined.

6. The tests of the National Planning Policy Framework (NPPF) paragraphs 108 to 111 "inter alia" require that all development should be sustainably located in order to encourage access by all modes of transport, that there is not a "*severe"* impact of the proposal on either the local or wider highway network, and that safe and suitable access to the site can be achieved for all types of movement.

7. It should be stressed at the outset that the level of development is significantly below the level where a detailed TS would usually be expected by the Council even if no account is taken of any "*netting off*" of impact, and it is opined that no more rigorous assessment other than that contained in this TS would be warranted in this case due to the "*de minimis*" level of impact as subsequently assessed. This TS has however been produced given the planning history, and provides a detailed highways / transport assessment.

Structure of this TS

8. This TS, in order to fully consider the various highways / transport issues is structured as follows:

   i) Paragraphs 10 to 29 consider the planning history of the site as it is opined that this is a material consideration in the determination of this planning application,

   ii) Paragraphs 30 to 36 detail the proposal, and the "*fall back*" uses of the site, and the access arrangements to the site as constructed,

   iii) Paragraphs 37 to 55 detail the traffic attraction / generation of the proposal, and the "*fall back*" uses,

   iv) Paragraphs 56 to 61 detail the traffic impact of the proposal on the local and wider highway network with appropriate deduction for the potential "*fall back*" use of the site,

   v) Paragraphs 62 to 65 consider the transport accessibility of the site, and

   vi) Paragraphs 66 to 76 consider the overall conclusions of this TS by reference to the policy context.

9 This TS should be read in conjunction with the various planning application drawings prepared by Larner Sing Limited and the Planning Statement prepared by xxx which are separately submitted in support of the planning application. Relevant drawings are also appended to this TS for ease of reference.

Planning History

W96/1460 and W98/0187

10. There is a planning history to the site with planning application W96/1460 as varied by planning application W98/0187 being extant and partially implemented that establish the "*fall back*" use of the site as a sports pitch with the site access fully approved, and constructed. As such, consent W98/1087 is considered to be the extant consent.

11. The difference to be assessed in this TS is that between the two scenarios being the deletion of the sports pitch, and its replacement by a Queen Elizabeth II Memorial Park, which it is opined is likely to be a significantly lower traffic generator than the sports pitch, which could have led to regular use of it rather than the more ad hoc use of the woodland memorial park where it is more likely to be derived from local residents walking rather than organised teams or groups of walkers.. In addition, there needs to be added in the impact of the four eco dwellings.

W/11/02637/OUT

12. Planning application W/11/02637/OUT dated 13th September 2011 was for four dwellings only, and an appeal was submitted against the non determination of the planning application, which was dismissed on the 31st August 2012. There were two main issues considered at the appeal, PINS reference APP/Y3940/A/12/2171109, namely firstly the effect of the development upon the character and appearance of the surrounding area, and secondly highway safety.

13. The Inspector's decision at paragraphs 9 to 11 considered highway safety. Paragraph 9 indicating:

> *"I am satisfied that the existing access into the site from Church Road would be adequate to serve the proposed development. The site is nevertheless remote from services, such that the erection of four dwellings in this location would in all probability increase the need to travel by car, contrary to Section 4 of the Framework."*

14. The Inspector as such accepted the access as constructed, but had concerns regarding the overall accessibility of the site b modes other than the private car. Paragraph 10 indicated:

> *"The evidence from the Highway Authority refers to the sub-standard junctions between Church Road and the busy A350 to the east and the B3097/Dursley Road junction to the west. Accordingly, development of the appeal site could potentially create additional hazards to road users to the detriment of highway safety."*

15. In our opinion, as considered later in this TS, to assess this aspect properly requires a knowledge of the quantum of impact. Paragraph 11 indicated:

> *"Whilst of themselves concerns with regard to highway safety aspects may not be a sufficient reason to withhold permission, in conjunction with the somewhat remote location of the site they add weight to my conclusion on the first main issue as to the impact of the development upon this open greenfield site."*

16. The Inspector had considered in this regard at paragraphs 7 and 8 that:

> *"The site is poorly served by public transport and is also remote from services, community facilities and employment opportunities. For these reasons, the scheme before me would not represent a sustainable form of development as described in the recently issued National Planning Policy Framework ('the Framework').*
>
> *I therefore find on the first main issue that development as proposed would have a detrimental effect on the character and appearance of the surrounding area, contrary to the objectives of "saved" Policies C1 and H19 of the Local Plan."*

17. In essence, the accessibility issues added to the Inspector's concerns rather than being necessarily a "stand alone" issue.

16/01261/FUL

18. Subsequently, a planning application in 2016, the Council's reference 16/01261/FUL, was submitted for a similar proposal to this current planning application namely a woodland area of 3 acres in total plus four 5 bedroomed dwellings. The planning application was submitted by SPE Developments on the 9th February 2016. The planning application was, it is opined, determined by the Council in a broadly similar

planning policy and guidance context. The highways consultation response to that planning application indicated:

> *"The application site is accessed off of Church Road, Heywood. The site can be accessed from two junctions; Church Road with the A350 (south-east of the site) and Dursley Road with the B3097 (north-west of the site), both of which have restricted visibility. Also, the site is located outside the Village Policy Limited of West Wiltshire's Development Framework. On the basis that the proposed development will increase the use of the two junctions which would be detrimental to highway safety and that the site is located outside the Village Policy Limit and is therefore considered an unsustainable location, I recommend that this application be refused on highway grounds for the following reasons:-*
>
> 1. *The increase in the use of the sub-standard junction of Church Road with the A350 and Dursley Road with the B3097, generated by the proposed development, would be prejudicial to road safety.*
> 2. *The proposal, located outside of village policy limits, is contrary to the National Planning Policy Framework (Section 4 paras 29, 30 & 37), the Adopted Wiltshire and Swindon Structure Plan 2016 (Policy DPI) and the Core Strategy for Wiltshire (Policy 60), which seek to reduce the need to travel, influence the rate of traffic growth and reduce the environmental impact of traffic overall in support of sustainable development."*

19. In our opinion, that view of the Council had not been informed by any detailed TS that had been submitted with that planning application that defined the net impact of the proposal. The Officers' Report at section 9 headed "*Planning Considerations*" considered the main issues including at Section 9.4 "*Transport*" indicating:

> *"WCS Core Policy 60 advises that the Council will use its planning and transport powers to help reduce the need to travel particularly by private car, and support and encourage the sustainable, safe and efficient movement of people and goods within and through Wiltshire.*

> *WCS Core Policy 61: Transport and New Development, advises that new development should be located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives. This policy also sets out the areas to be addressed in a required Transport Assessment, the requirement for safe access to the highway, contributions towards sustainable transport improvements and the use of travel plans.*
>
> *WCS Core Policy 62: Development Impacts on the Transport Network, advises that developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages.*
>
> *WCS Core Policy 64: Demand Management, refers to residential car parking standards.*
>
> *As the site is located outside identified limits of development it would fail to contribute to sustainable transport as required by WCS Core Policy 60. Furthermore transport officers have advised that increased vehicular movements arising from this development would have an adverse impact on the surrounding network.*
>
> *When determining the previously dismissed appeal the Inspector took the view that whilst the impacts on the surrounding highway network would not in themselves justify refusal of the application they add weight to his conclusion on the effect of the development on the character and appearance of the area."*

20. The planning application was refused permission on the 5th July 2016 with three reasons for refusal. The second and third reasons for refusal were not highways / transport related, and were in respect of encroachment into the countryside, and the insufficient level of information provided in support of the application in respect of ecology.

21. The first reason for refusal covered a number of themes including accessibility as part of the first reason indicating:

> *"Furthermore, the proposed development would be poorly served by local services, facilities and amenities such that the occupants of the dwellings would likely be heavily reliant on the use of private cars for the majority of routine journeys. It would therefore result in the increase*

> *in the use of the sub-standard junction of Church Road with the A350 and Dursley Road with the B3097 and be contrary to Core Policies 60, 61 and 62 of the Wiltshire Core Strategy. The unsustainable location of the site, together with the unacceptable impact on the character and appearance of the countryside identified below, significantly and demonstrably outweigh any limited benefits that the construction of 4 houses in this location would have."*

22. The decision notice issued by the Council also indicated at the informative that:

> *"As the proposal is in clear conflict with the policies of the up to date development plan, and an appeal on this site has previously been dismissed, for the reasons set out above the applicant is advised that the Council believes that any appeal against this decision would have no reasonable prospect of succeeding.*
>
> *Accordingly, the applicant is advised that if an appeal is submitted the Council will be making an application for a full award of its costs incurred in dealing with the appeal, based on substantive grounds. The applicant's attention is drawn to paragraph 053 Ref ID: 16-053-20140306 in Planning Practice Guidance which sets out government guidance on this matter."*

23. Even with that informative of the Council, the refusal of the planning application had been appealed with the Inspector's decision dated 31st May 2017. The appeal had been dismissed. An application for costs by the Council was also dismissed. The Inspector considered highways / transport issues as one of the main issues indicating at paragraph 3 of the decision notice:

> *"whether the site offers an acceptable location for the proposed developing, having regard to its accessibility to local facilities."*

24. The Inspector did not consider the issue of highways / traffic impact as being of particular concern except in respect of the accessibility deficiency consequentially leading to a suggestion of increased vehicle movements.

25. The TS subsequently includes details of the traffic generation / impact assessment, and the justification for the visibility splays onto both the A350 and the B3097 raised as being of concern by the Council and a feature of the Inspector's concerns.

26. Paragraph 6 of the Appeal decision is one of the main paragraphs to consider:

> *"Furthermore, although there are a number of other properties located nearby, no services are evident in the immediate vicinity and it appears remote from the surrounding settlements. Paragraph 55 of the National Planning Policy Framework ("the Framework") advises against new isolated dwellings in the countryside other than in a limited number of defined circumstances. While not physically isolated in respect of other dwellings, in view of its remoteness from services, I consider the proposed dwellings would be isolated within the meaning of Paragraph 55, In the absence of any evidence which would indicate that one or more of the special circumstances set out in that paragraph are engaged, I find the proposal would be contrary to the national planning policy."*

27. The policy context in terms of rural areas is considered subsequently in this TS. Paragraphs 7 and 8 indicated:

> *"Moreover, the bus timetables provided by the appellant indicate that, while some public transport is available, it is limited both in terms of its extent and frequency. When taken with the limited services available nearby, there is every indication that the proposal would result in a high degree of reliance on the use of private vehicles. As such, the site would offer no real choice of sustainable transport opportunities to future occupiers. This lack of sustainable transport provision would be contrary to CS Policy CP60, CP61 & CP62 all of which seek to reduce the need to travel by private car and encourage the use of more sustainable modes of transport.*
>
> *The appellant has argued that in view of its proximity to the nearby business parks, the appeal site offers a number of employment opportunities for future occupants. However, I observed that these are located some distance from the appeal site and in view of the limited sustainable transport opportunities available. I find that it provides limited support in favour of the proposal. Similarly, while I accept that the existing properties in Heywood are no differently serviced by public transport than the appeal site, it does not overcome the policy objections identified above or justify the grant of planning permission for the residential development proposed."*

28. In essence, the argument being that the lack of local facilities would increase vehicle movements hence conflicting detrimentally with the operation of the A350 / Church Road junction, and the B3097 / Dursley Road junction.
29. Although a detailed Written Statement had been submitted in support of the 2016 Appeal prepared by the agent, Larner Sing Limited, there had been no specific highways / transport consultant's input either into that Written Statement or by the submission of an additional highways / transport Written Statement.

The Proposal

30. The proposal is for four detached eco dwellings, and a woodland memorial park. The only difference to be assessed in this TS is the deletion of the playing field, and its replacement by a Queen Elizabeth II Memorial Park, which it is opined is likely to be a significantly lower traffic generator, and the impact of the four eco dwellings.

The "Fall Back" Uses

31. The fall back is sports pitch as shown on drawing 424/1 being for a football pitch with a cricket square for summer use, a childrens' play area, car parking for 17 vehicles and the vehicular access. The second condition attached to planning application W98/0187 makes it clear that the permission:

> *"shall relate solely to the construction of an alternative access to the sports pitch previously permitted on 5 June 1997 under reference W96/1460. For the avoidance of doubt, it does not grant permission, not does it imply that permission will be granted for any other development proposal indicated on the submitted drawing."*

Access

32. The site has its sole access onto Church Road, which only serves the site. There is not proposed to be any alteration to the access arrangements for the proposal which would have only a "*de minimis*" impact at "*worst*" on a peak hourly basis, or at "*best"* a significant reduction in vehicle movements expressed on a daily basis.



Plate A: Site Access onto Church Road

33. The site access is onto Church Road which is a low order village road, and is neither an A road or a B road. The road is essentially residential in character. No issue has been raised by the Council or by Inspectors at the various appeals about the site access impact. Some of the local bus services route along Church Road at some times of day.

34. The site access is as approved by planning application W96/1460 as varied by planning application W98/0187, and is already formed as shown on **plate A**. The access is a simple priority junction access onto Church Road without a ghosted right turn lane provision. As shown on **plates B and C** visibility looking both left and right respectively are in excess of the 2.4m by 43m currently required by the posted speed limit assuming the principles of the Manual for Streets (MfS) are applied. Planning application W96/1460 required as condition 7 visibility splays of 4.5m by 90m in both directions. In addition, **plates D and E** show the following which are also well in excess of the required 43m:

    i) **Plate D** shows the forward visibility looking along Church Road to the west from the position of a driver of a vehicle turning right into the access, and

    ii) **Plate E** shows the rear visibility view looking along Church Road to the east from the driver of a vehicle turning right into the access essentially looking in the rear view mirror.



Plate B: Visibility from site access at 2.4m "set back" looking left

The Access Issues

35. For the development of sites, there are the following key issues that are required to be addressed namely:

    i) Whether a safe and suitable access to the site for all users can be achieved which in this case is onto Church Road using the existing access arrangements,

    ii) The impact of the proposed development on the local and wider highway network with the alteration compared to the extant consent to assess if there is a "*severe*" impact which in this case should be considered at the site access and as appropriate at adjacent junctions normally considered to be the first junction either side of the site access, which are the junctions of the A350 with Church Road to the east, and the B3097 with Dursley Road to the west (Dursley Road being the extension of Church Road to the west), and

    iii) The overall accessibility of the site in order to allow for access to the site by modes other than single occupancy car use.



Plate C: Visibility from Site Access at 2.4m "set back" looking to the right



Plate D: Forward visibility from a vehicle turning into access looking along Church Road



Plate E: Rearward visibility from right turning traffic into site access onto Church Road looking east towards A350

36. These issues are essentially those detailed in the NPPF paragraphs 110, and 111. This TS will demonstrate by reference to the above that there is no significant impact of the proposal when account is taken of the deletion of the "*fall back*" uses as sports pitch, and as such there is no need to assess the adequacy of the site access. Furthermore, if there is no significant impact then there cannot be any validity to any argument that may be raised regarding the impact of the proposal on either the local or wider highway network. As the proposal lies within Heywood it is as transport accessible as the remainder of the settlement, and bus services that link Heywood to other local locations within a short duration encouraging non car borne use.

Traffic Generation: Preamble

37. For the assessment of traffic generation both for the proposal and the "*fall back*" uses, the TRICS database version 2023 (b) v7.9.4 has been used to ensure that the latest versions of all available data is used.

38. The TRICS Consortium advocate when considering trip rates that:

> *"By definition the use of "averages" as a guide to future developments implies that such values are likely to be exceeded on 50% of occasions. The Consortium have found based on experience that it may be of more*

> *value to look at the range of observed trip rates and then select a value close to say an 85th percentile of all values. Such estimates provide a reasonable assurance, both to developer and the highway authority, that any infrastructure provision will meet the demands placed upon it."*

39. In assessing the site by reference to TRICS particular regard will be made to the "*TRICS Good Practice Guide 2023*". The Guide essentially provides guidance to users of the TRICS system *"so that they may undertake good practice when using the system*". One of the key principles as set out at paragraph 1.4 is:

> *"There are many areas within the system whereby careful selection criteria and ranges are important in achieving robust and reliable data calculated by the system. The guidance is designed to assist users in this task."*

40. One of the principles identified under the heading "*Understanding Land Use Definitions*" at paragraph 3.2 indicates:

> *"It is vital that users apply trip rate calculation data from land uses which correctly apply to their individual cases. For example, a discount food store (e.g. Aldi) should not apply to a larger mainstream foodstore (e.g. Asda)."*

41. Section 4 considers site selection by reference to the various selection parameters. The indication at paragraph 4.2 being:

> *"trip rates obtained from Greater London cannot apply to trip rates generated from the Shetland Islands, for obvious reasons. But, taking into account all local factors, especially the location type, there is no obvious reason why some data from, say, Glasgow cannot apply to some data from Greater Manchester. Similarly, some site scenarios in parts of London may be compatible with sites in other large cities. However, the importance of compatibility in terms of local population, vehicle ownership, location type, etc. cannot be stressed enough. It is in the areas of site and development data where true compatibility should be sought, rather than just through the exclusion of regions, which could unnecessarily remove many compatible sites from a user's selected set."*

42. Paragraph 4.5 additionally indicates:

"*The most important data fields in terms of site selection compatibility are the main category and sub-category location types. Sites in a town centre with good local public transport accessibility will naturally, as a rule, achieve a different type of modal split to a site in the country without any public transport. Mixing sites which are clearly incompatible in a set for trip rate calculation could lead to the production of misleading trip rates."*

43. Paragraph 4.7 indicates examples where data should not be mixed:

"There are occasions where the location mix within a selected data set is not acceptable. For example, a mix of sites containing both "Town Centre" and "Free Standing (out of town)" location types will most likely produce incorrect and misleading trip rate results. If a mix of location types is used (based on Table 4.1), it is the data supplier's responsibility to ensure that justification for the inclusion of the mix is given. This should include geographical location evidence, such as maps, etc."

44. For reasons, that will be evident below, advice in the Good Practice Guide also covers the selection of site, and sample sizes. Paragraph 11.1 indicates:

"The food superstore category has over 260 sites present, whilst other sets of data contain lower levels. Because of this, obtaining a representative sample of data for a trip rate calculation involves a balance between meeting a set of criteria for inclusion and the availability of data. "

45. Paragraph 11.2 covers rules regarding the number of sites in a sample indicating:

"The general rule for obtaining a representative sample of data is to include as many sites as possible. But this should not be to the detriment of selection criteria. Wherever possible, users should aim to use as stringent a set of criteria as possible and obtain a selected set of at least 5 or 6 sites. However, there are no fixed rules; the aim is to achieve a balance. It is better practice to have a lower number of sites acceptable to the selection criteria than to have a larger data set which is not. In the latter case, the trip rates produced will more likely be misrepresentative than the former case. However, because of the complex diversity of the database, it is impossible to define a preferred number of sites."

46. Paragraph 11.9 considers the issue that may arise in the disparity between selecting a high trip rate for network testing, and parking implications viz:

> *"It should also be noted that presenting relatively high trip rates may wrongly inflate potential parking levels, and therefore use of 85th percentile trip rate figures needs to reflect his possibility."*

47. The summary at section 19.4 indicates:

> *"Location type, both main category and sub-category, is a very important factor in the selection of sites for trip rate calculation. There is no clear evidence to suggest that users should select sites by regional category; it is more appropriate to select sites which meet similar local Environmental and location-type conditions, within agreed criteria."*

48. Paragraph 19.11 indicates:

> *"The general rule for representative sample sizes in TRICS is "the more the better". However, this is not always an option. Users are encouraged to find a balance between the strictness of their selection criteria and the level of data available."*

Traffic Generation: Proposed Residential Use

49. The selection process has excluded sites that would be unrepresentative in terms of size of the development whilst ensuring in accordance with paragraph 11.2 that the overall sample size is not too small.

50. The site as proposed falls within TRICS category 03-A "*Residential: Housing Privately Owned*" with sites have been selected that to ensure that a representative sample size can be achieved, and within the lowest population bands and to more closely replicate the likely traffic generation of the proposal. The TRICS output for this assessment is included as appendix A.

51. The weekday total vehicular generation of the proposal for a weekday for the 4 units for various time periods is summarised as:

Period	**Arrivals**	**Departures**	**Two way**
A.M. peak 08.00 to 09.00	1	2	3
P.M. peak 16.00 to 17.00	2	1	3
Daily 07.00 to 19.00	12	124	24

52. Even if no account is taken of the deletion of the approved sports pitch and its replacement by woodland, the peak hourly impact spread across the highway network

is "*de minimis"* and highly unlikely due to a maximum of 1 vehicle per hour leaving either Dursley Road or Church Road to affect the operation of either junction detrimentally in the network peak periods. This is defined as the 2 departures in the a.m. Peak hour split as 50% to the west and 50% to the east. The total daily values being one vehicle per hour on average through the day.

Traffic Generation: Leisure Uses

Preamble

53 For the leisure uses either extant or proposed there are no directly comparable sites within the TRICS database, therefore a "*first principles*" assessment is considered for this TS, and for consistency of approach a "*first principles*" assessment will be applied to both the sports pitch plus the woodland park.

Sports Pitches

54. The sports pitch could be used for 11 a side football if used as the whole area or two 5 a side pitches if split. The evaluation on a first principles basis could for 11 a side football which could see 26 participants in total including two reserves per team plus a further two coaches / managers, and potentially three officials for linesmen / referee duties. This could lead to a maximum of 31 people on site when the sports field is in use. It is likely that the three officials and the two managers / coaches will travel independently though the participants may travel together and assuming 2.0 participants per car could result in the sports field at its peak having 18 vehicles parked with 18 arrivals and 18 departures each time the pitch is used. In addition, there could be spectators watching the various games including parents, friends and family.

Memorial Park

55. The memorial park would be a low key activity where users would amble around the 3 acres of land, and absorb the tranquil atmosphere. It would, it is opined, be a neighbourhood facility for users from within the village most likely rather than a destination attraction, and therefore would, it is opined, not be likely to lead to significant vehicle traffic generation but walk in or cycle access primarily.

Impact on the Wider Highway Network

56. The impact of the proposal is the difference between the values at paragragh 51 for the proposal minus the values from paragraph. This results in the following calculation:

Period		Arrivals	Departures	Two way
A.M. peak 08.00 to 09.00				
	Residential	1	2	3
	Sports	0	0	0
	Impact	+1	+2	+3
P.M. peak 16.00 to 17.00				
	Residential	2	1	3
	Sports	0	0	0
	Impact	+2	+1	+3
Daily 07.00 to 19.00				
	Residential	12	12	24
	Sports	18	18	36
	Impact	-6	-6	-12

57. The values for the "fall back" assume the use of the sports pitch once per day only, and with minimal visitors. The values indicate over the whole day a reduction in vehicle movements onto and along the local and wider highway network.

A350 / Church Road Junction

58. The peak hourly impact spread across the highway network is "*de minimis"* and highly unlikely due to a maximum of 1 vehicles per hour leaving the junction. The level of additional movements being unlikely to affect the operation of either of the junctions detrimentally, or to any noticeable degree.

59. Before considering the levels of visibility at various measurements at both the A350 / Church Road junction and at the B3097 / Dursley Road junction, it is prudent to set the context of guidance based on appropriate research, and in particular the "*Manual for Streets 2: Wider Application of the Principles*" (MfS2) which was published in September 2010, and has updated the *Manual for Streets* (MfS1) in so far as the application of MfS2 takes account of various appeal decisions.

60. Paragraph 10.4.2 indicates:

> *"It has often been assumed that a failure to provide visibility at priority junctions in accordance with the values recommended in MfS1 or DMRB*

> *(as appropriate) will result in an increased risk of injury collisions. Research carried out by TMS Consultancy for MfS2 has found no evidence of this (see research summary below). Research into cycle safety at T-junctions found that higher cycle collision rates are associated with greater visibility."*

61. The research summary referred to in paragraph 10.4.2 indicated the purpose of the research viz:

> *"The accepted approach to visibility at priority junctions has been to provide a minimum stopping sight distance value appropriate to a particular design speed. The assumption made by some designers and road safety auditors is that this value provides a minimum road safety requirement, and that collision risk will increase if the SSD is not achieved.*
>
> *The purpose of this research was to examine this assumption and to identify whether or not a direct relationship can be established between variations in Y distance SSD and collision frequency at priority junctions."*

62. The overall research conclusion being:

> *"This study has been unable to demonstrate that road safety concerns regarding reduced Y distance are directly associated with increased collision risk at "high-risk" urban sites;*
>
> *Previous research for MfS1 demonstrated that main road speed is influenced by road width and forward visibility. Many of the locations in this study were straight roads with good forward visibility. The ability of the driver to stop is likely to be affected by more than just what is happening in the side road and an understanding of the factors influencing main road speed is important when assessing visibility requirements."*

63. MfS2 indicates at paragraph 10.5.6 that an "x" distance of 2.4m is to be preferred:

> *"An X distance of 2.4m should normally be used in most built-up situations, as this represents a reasonable maximum distance between the front of a car and the driver's eye."*

64. MfS2 paragraph 10.5.9 is in our opinion the key advice to consider:

"The Y distance should be based on the recommended SSD values. However, based on the research referred to above, unless there is local evidence to the contrary, a reduction in visibility below recommended levels will not necessarily lead to a significant problem."

65. That would be the case here, and it is contended that vehicles approaching the junction can see emerging vehicles' intentions from either direction.



Plate F: Visibility Looking Left from Church Road along the A350

66. The levels of visibility achieved at various measurements are:

67. **Plates F and G** show the visibility splays to the left and to the right respectively.

B3097 / Dursley Road Junction

68. The peak hourly impact spread across the highway network as detailed above is "*de minimis"* and highly unlikely due to a maximum of 1 vehicle per hour leaving the junction to affect the operation of the junction detrimentally. Vehicles approaching the junction can see emerging vehicles' intentions from either direction. The levels of visibility achieved at various measurements are:

69. **Plates H and I** show the visibility splays to the left and to the right respectively.



Plate G: Visibility Looking Right from Church Road along the A350

Accessibility

70. The site is, it is opined, as transport sustainable as the adjacent area as it falls within Heywood. There are public footpaths and bridleways in the village giving ready access to the adjacent countryside for walkers, horse riders, and cyclists fostering a healthy lifestyle. Measured from the site entrance the nearest convenience store is located at the White Horse Industrial Estate which is of the order of a 1.9km walk assisted by a footway along most of its length. Although it is at the higher end of acceptable walk distances it is 40% of the level where guidance indicates cycling as replacing car use. Furthermore the site is within a 15 minute cycle of Westbury railway station, and the nearest pubic house is 1.6km walk away. School bus services already serve the village.

Bus Services

71. Travel by bus based public transport is convenient with bus stops for both directions of travel within a short level walk of the order of 100m from the site access along Church Road. The services were correct at the time of preparing this TS:

87 Trowbridge to Devizes

via Trowbridge White Horse Business Park and Westbury



Plate H: Visibility Looking Left from Dursley Road along the B3097



Plate I: Visibility Looking Right from Dursley Road along the B3097

Trowbridge

From 08.45 11.05 13.05 16.35 17.20

To 09.28 12.06 14.06

White Horse Business Park

From 08.55 11.13 13.18 16.48 17.28

To 09.28 12.06 14.06

Westbury

From 08.02 09.19 11.57 13.57

To 08.58 11.16 13.21 16.54 17.32

72. The typical journey times by bus in minutes being to:

Westbury	9
White Horse Business Park	3
Trowbridge	10

Policy Context and Conclusions

73. Our conclusions are by reference to National Planning Policy Framework (NPPF). The NPPF sets out the Government's economic, environmental and social policies. The NPPF is committed to a "*presumption in favour of sustainable development*". Essentially, local planning authorities are required to approve development proposals that accord with the Development Plan, and to grant planning permission where the Development Plan is absent, silent, indeterminate or where policies are out of date.

74. Paragraph 85 of the NPPF indicates:

> *"Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."*

75. For such a located development, the key points of NPPF paragraph 85 are the issue of the potential unacceptable impact on local roads, and the ability to exploit any opportunities to make a location (the planning application site) more sustainable.

76. Chapter 9 sets the aims and policies for *'Promoting sustainable transport'.* Under this heading paragraph 104 indicates:

> *"Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
>
> *a) the potential impacts of development on transport networks can be addressed;*
>
> *b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
>
> *c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
>
> *d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
>
> *e) pattens of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places."*

77. Guidance within this paragraph of the NPPF explicitly recognises the differences between locations, such as this which is located in a rural area and those sites in urban areas, regarding the accessibility of sites by modes of movement other than the private car. This does not mean that development in rural areas should not have some level of appropriate development on it.

78. Chapter 9 sets the aims and policies for *'Promoting sustainable transport'.* Under this heading paragraph 102 indicates:

> *"Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
>
> *a) the potential impacts of development on transport networks can be addressed;*
>
> *b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*

c) opportunities to promote walking, cycling and public transport use are identified and pursued;

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

e) pattens of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places."

79. Guidance within this paragraph of the NPPF explicitly recognises the differences between locations, such as this which is located in a rural area appropriate for the type of proposal and those sites in urban areas, regarding the accessibility of sites by modes of movement other than the private car. This does not however mean that rural areas should not have some level of appropriate development.

80. NPPF paragraph 110 indicates:

"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."

81 Whilst paragraph 111 indicates:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

82. That would be the context here:

i) The nearest bus stops are well within the "*ideal"* walking distance. The bus services within walking distance link the site to Trowbridge and Westbury for a range of employment, shopping and leisure opportunities albeit with a limited number of services per day though reflective of the rural area,

ii) The site can be accessed safely by all modes of movement, and

iii) The impact of the development is not "*severe"* by any reasonable definition even at its peak when account is taken of the deletion of the "*fall back*" uses of the site, and even if no account is taken of it.

83. On this basis, the development is considered to fully accord with paragraphs 110 and 111 of the NPPF.

Calculation Reference: AUDIT-748101-230116-0101

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
Category : A - HOUSES PRIVATELY OWNED
TOTAL VEHICLES

Selected regions and areas:

02	SOUTH EAST		
	ES	EAST SUSSEX	1 days
04	EAST ANGLIA		
	SF	SUFFOLK	1 days
05	EAST MIDLANDS		
	NM	WEST NORTHAMPTONSHIRE	1 days
12	CONNAUGHT		
	CS	SLIGO	2 days
17	ULSTER (NORTHERN IRELAND)		
	TY	TYRONE	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
Actual Range: 30 to 134 (units:)
Range Selected by User: 4 to 4334 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:
Selection by: Include all surveys

Date Range: 01/01/14 to 14/10/22

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Tuesday	1 days
Thursday	3 days
Friday	2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	6 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines.

Selected Locations:

Edge of Town	2
Neighbourhood Centre (PPS6 Local Centre)	4

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Industrial Zone	1
Residential Zone	1
Village	4

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village,

Secondary Filtering selection:

Use Class:

C3	6 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

All Surveys Included

Population within 1 mile:

1,000 or Less	6 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,000 or Less	2 days
5,001 to 25,000	1 days
25,001 to 50,000	2 days
125,001 to 250,000	1 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

1.1 to 1.5	2 days
1.6 to 2.0	4 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

No	6 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	6 days

This data displays the number of selected surveys with PTAL Ratings.

Covid-19 Restrictions	Yes	At least one survey within the selected data set was undertaken at a time of Covid-19 restrictions

LIST OF SITES relevant to selection parameters

1 CS-03-A-03 MIXED HOUSES SLIGO
TOP ROAD
STRANDHILL
STRANDHILL
Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 30
Survey date: THURSDAY *27/10/16* *Survey Type: MANUAL*

2 CS-03-A-04 DETACHED & SEMI-DETACHED SLIGO
R292
STRANDHILL

Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 63
Survey date: THURSDAY *27/10/16* *Survey Type: MANUAL*

3 ES-03-A-04 MIXED HOUSES & FLATS EAST SUSSEX
NEW LYDD ROAD
CAMBER

Edge of Town
Residential Zone
Total No of Dwellings: 134
Survey date: FRIDAY *15/07/16* *Survey Type: MANUAL*

4 NM-03-A-02 DETACHED & SEMI-DETACHED WEST NORTHAMPTONSHIRE
HARLESTONE ROAD
NEAR NORTHAMPTON
CHAPEL BRAMPTON
Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 47
Survey date: TUESDAY *20/10/20* *Survey Type: MANUAL*

5 SF-03-A-06 DETACHED & SEMI-DETACHED SUFFOLK
BURY ROAD
KENTFORD

Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 38
Survey date: FRIDAY *22/09/17* *Survey Type: MANUAL*

6 TY-03-A-02 SEMI DETACHED & BUNGALOWS TYRONE
SANDHOLES ROAD
COOKSTOWN
DERRYLORAN
Edge of Town
Industrial Zone
Total No of Dwellings: 101
Survey date: THURSDAY *14/03/19* *Survey Type: MANUAL*

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
TOTAL VEHICLES
Calculation factor: 1 DWELLS
Estimated TRIP rate value per 4 DWELLS shown in shaded columns
BOLD print indicates peak (busiest) period

	ARRIVALS				DEPARTURES				TOTALS			
Time Range	No. Days	Ave. DWELLS	Trip Rate	Estimated Trip Rate	No. Days	Ave. DWELLS	Trip Rate	Estimated Trip Rate	No. Days	Ave. DWELLS	Trip Rate	Estimated Trip Rate
00:00 - 01:00												
01:00 - 02:00												
02:00 - 03:00												
03:00 - 04:00												
04:00 - 05:00												
05:00 - 06:00												
06:00 - 07:00												
07:00 - 08:00	6	69	0.068	0.271	6	69	0.249	0.998	6	69	0.317	1.269
08:00 - 09:00	6	69	0.136	0.542	6	69	0.438	1.753	6	69	0.574	2.295
09:00 - 10:00	6	69	0.172	0.688	6	69	0.252	1.007	6	69	0.424	1.695
10:00 - 11:00	6	69	0.179	0.717	6	69	0.186	0.746	6	69	0.365	1.463
11:00 - 12:00	6	69	0.194	0.775	6	69	0.235	0.939	6	69	0.429	1.714
12:00 - 13:00	6	69	0.211	0.843	6	69	0.242	0.969	6	69	0.453	1.812
13:00 - 14:00	6	69	0.252	1.007	6	69	0.213	0.852	6	69	0.465	1.859
14:00 - 15:00	6	69	0.232	0.930	6	69	0.225	0.901	6	69	0.457	1.831
15:00 - 16:00	6	69	0.303	1.211	6	69	0.252	1.007	6	69	0.555	2.218
16:00 - 17:00	6	69	0.315	1.259	6	69	0.235	0.939	6	69	0.550	2.198
17:00 - 18:00	6	69	0.479	1.918	6	69	0.247	0.988	6	69	0.726	2.906
18:00 - 19:00	6	69	0.332	1.327	6	69	0.262	1.046	6	69	0.594	2.373
19:00 - 20:00												
20:00 - 21:00												
21:00 - 22:00												
22:00 - 23:00												
23:00 - 24:00												
Total Rates:			2.873	11.488			3.036	12.145			5.909	23.633

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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Parameter summary

Trip rate parameter range selected:	30 - 134 (units:)
Survey date date range:	01/01/14 - 14/10/22
Number of weekdays (Monday-Friday):	6
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.