

Technical Note 01B

Project: Manor Farm, Sopworth

Subject: Transport Review

Client: Local Resident

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Introduction

1. This Technical Note considers transport and sustainability matters with regard to a Class R planning application to determine if prior approval is required for a proposed change of use of agricultural buildings for commercial use.
2. Bruce Bamber is Director of Railton TPC Ltd and has worked for over 35 years in the transport planning industry. He has dealt with the transport and access arrangements for a wide range of development types from local to strategic scale and has been involved with numerous transport studies for public and private sector clients. He has given evidence at informal hearings and public inquiries, participated in Local Plan Inquiries and at a DCO Hearing. He is a Member of the Chartered Institution of Highways and Transportation.
3. A Transport Statement (TS) has been submitted in support of the application (Rappor, May 2026). The content of this report has been assessed. The author has also undertaken a site visit and met with local residents to better understand local transport concerns.
4. The following sections consider the issues of trip generation, transport sustainability, access arrangements and parking provision.
5. These issues are considered in the context of Paragraphs 109 and 110 of the NPPF that seek to achieve sustainable transport, Paragraph 115 that requires the provision of safe and suitable access, Paragraph 116 that related to highway safety and Paragraph 117 that deals with active travel, public transport and the efficient delivery of goods.

Car Trip Generation

6. The TS sets out trip generation rates for office and light industrial uses and applies these rates to proposed floor areas to arrive at numbers of cars generated in the 08:00-09:00 and 17:00-18:00 peak hours (TS, Tables 6.1, 6.2 and 6.3).

7. The source trip generation rates are derived from the TRICS database and details are provided in Appendices H and I of the TS.
8. Scrutiny of the TRICS data reveals the following areas of concern:
 - Of the four selected office sites, three are identified as being at 'edge of town' locations and one is identified as being situated in a 'neighbourhood centre'. These sites do not reflect the rural nature of the proposed development;
 - The office sites have between 350 and 2,307 people living within 500m and between 5,000 and 20,000 people within 1 mile. The surrounding populations at the survey sites are therefore far in excess of the population around the proposed development site;
 - Of the four selected light industrial sites, three are identified as being at 'edge of town' locations and one is identified as being situated in a 'neighbourhood centre';
 - The light industrial sites have between 75 and 1,497 people living within 500m and between 1,000 and 10,000 people within 1 mile. The surrounding populations at the survey sites are therefore in excess of the population around the proposed development site.
9. All of the survey sites are in more urban settings with far greater population density within walking distance than the Sopworth site. Urban settings are provided with much higher levels of provision for pedestrians (footways, crossings), cyclists and public transport than the village of Sopworth and thus provide greater opportunities to travel by means other than the private car (see below).
10. The unrepresentative nature of the source trip generation surveys leads to the conclusion that the level of car use at the proposed site is likely to have been underestimated.

HGV Trip Generation

11. Light industrial uses can generate significant numbers of larger vehicles. The TS provides no assessment of the potential for the site to generate larger vehicles.
12. The presence of larger vehicles has the potential to lead to adverse amenity and safety impacts. These are discussed further below.

Transport Sustainability

13. The following paragraphs assess the accessibility of the site by sustainable modes

14. **Walking:** Only the village of Sopworth is within walking distance of the site. It is likely that the number of employees at the proposed development living in Sopworth would be zero or extremely low.
15. No other villages are within a reasonable walking distance of the site and none of the lanes connecting the site to surrounding areas are provided with footways.
16. The applicant does not propose any improvement to off-site pedestrian facilities.
17. **Cycling:** Within a maximum reasonable cycling distance of 5 miles there are only villages. Cycling would be via unlit, often narrow and winding, country lanes with no provision for cyclists. Many of the surrounding lanes are of insufficient width to allow a car to safely pass a cyclist.
18. The lack of urban centres within cycling distance and the poor quality of potential cycling routes indicates that very few employees would live within cycling distance and of them, only an extremely small proportion would be prepared to regularly use the available cycling routes.
19. **Buses:** The village has one school bus service. There is no opportunity for potential employees to travel by public transport and no improvements to public transport are proposed.
20. **Trains:** No train stations are available in the local area.
21. **Existing Mode Share:** The following table provides an indication of the existing mode of travel used by employees in the local area:

Table 1: Census Mode of Travel to Work (2011) (People working in and around Sopworth)

Mode	%
On foot	9.3%
By bicycle	2.2%
Bus	1.9%
Train	1.0%
Car driver	79.8%
Car passenger	4.8%
Motorcycle	1.0%
Total	100.0%

Source: Nomis Table WD703EW for Wiltshire 005 super output area – middle layer

22. A car driver mode share of 79.8% is extremely high. The data are only available for the middle layer output area that includes larger settlements in the vicinity such as Sherston, Alderton, Hullavington and the fringes of Malmesbury. These settlements provide much greater opportunity to walk, cycle and use public transport than Sopworth and the results are therefore skewed by the more sustainable travel patterns elsewhere in the area. The car driver mode share for employment in Sopworth would therefore be significantly higher than for the census area as a whole.
23. Paragraph 110 of the National Planning Policy Framework relates to transport sustainability:

*'110. The planning system should actively manage patterns of growth in support of these objectives. **Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.** This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'* (**emphasis added**)

24. Journeys between the development and employees' homes would be almost entirely dependent on the private car. For those working within the development, there are no facilities within walking distance in the village. All journeys to use facilities, for example, at lunchtime, would therefore also be by private car. It is clear from the assessment of opportunities for employees to travel by sustainable modes that the need to travel is not limited and there is not a genuine choice of transport modes available for the vast majority of trips.
25. The latter part of Paragraph 110 recognises that opportunities to maximise sustainable transport vary between urban and rural areas. This is true but focuses attention on the key issue which is that this is an inappropriate location for significant numbers of employees. The fact that there are differences between rural and urban areas does not negate the fundamental policy conflict of locating significant numbers of jobs, that would attract employees from over a wide area, where it is impossible to walk or use public transport and cycling is difficult and hazardous.
26. It is therefore considered that the proposals are not in accordance with Paragraph 110 of the NPPF.
27. Paragraph 115 of the NPPF is also relevant to this proposal:

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

a. sustainable transport modes are prioritised taking account of the vision for the site, 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 Code⁴⁸; 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 through a vision-led approach'. (emphasis added)

28. It has been shown that sustainable modes are not prioritised. It is also clear that there is no sustainable transport vision for the site, and that the scale and type of development in this location is inappropriate in terms of sustainable transport. The proposed development does not, therefore comply with Paragraph 115 of the NPPF.

29. A further policy conflict is evident from the fact that safe and suitable access to the site cannot be achieved for all users. The lack of any safe pedestrian routes from surrounding areas and the narrowness of surrounding lanes would make travel on foot or by bicycle hazardous.

30. Paragraph 117 of the NPPF states:

'117. Within this context, applications for development should:

a. give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

b. address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c. create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

d. allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e. be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.' (emphasis added)

31. The proposed development conflicts with this Paragraph for the same reasons; a lack of sustainable access.

32. It is concluded that the site's isolated location with little population within walking distance and an absence of public transport leads to the conclusion that the proposals are contrary to Paragraphs 110, 115 and 117 of the NPPF.

Low Standard of Surrounding Highways

33. The level of trip generation of the proposed development would not lead to links or junctions operating over capacity. However, the highway network around Sopworth is of a very low standard.
34. There are four lanes leading to the village arranged approximately around the points of the compass. The lanes to the north and west connect with the A433. The lane to the east connects with Sherston and the lane to the south leads to Luckington.
35. All of these lanes have sections where two light vehicles are unable to pass and therefore operate as a single lane with passing places. All the lanes have tight bends that limit forward visibility. In such circumstances, even relatively small increases in traffic levels can lead to adverse safety impacts as drivers are forced to stop suddenly and, in some circumstances, reverse in locations where oncoming vehicles have limited ability to react.
36. The lanes are used by pedestrians, recreational cyclists and equestrians. The Highway Code states that drivers should allow a minimum 2.0m separation between their vehicle and a pedestrian or an equestrian and 1.5m for cyclists¹. Pedestrians and cyclists take up around 0.5m and an equestrian takes up around 1.0m. The absolute minimum width of road required for a car to safely pass a pedestrian is therefore 4.5m, to pass a cyclists it is 5.0m and to pass an equestrian it is 5.5m. Many sections of the surrounding lanes do not allow for these safe margins to be achieved.
37. It is concluded that the use of the surrounding lanes by pedestrians, cyclists and equestrians; vulnerable highway users, makes them highly sensitive to changes in traffic levels. The development of an employment site attracting significant numbers of vehicles in this location raises concerns regarding vulnerable highway users in terms of amenity and safety.

Access Arrangements

38. The proposed site access arrangements are shown on Drawing 3001 Rev. P01 that is attached as Appendix E of the TS.
39. The access drawing shows visibility splays to the north and south from a point 2.4m back from the edge of the main carriageway in the centre of the site access. The visibility splays are shown as 40.4m to the north and 41.6m to the south. These are calculated from observed 85th percentile vehicle speeds of 28.1mph southbound and 28.7mph northbound.

¹ See paragraph 163 of Highway Code

40. In order to achieve safe visibility to the south, it is proposed to remove an existing tree and to realign the wall to ensure that it does not obstruct visibility². These works are indicated on the drawing in Appendix E of the TS.
41. Visibility to the north is shown measured to the centre of the road. This is not standard practice as visibility is generally measured to the nearside kerb to ensure that the whole of the road at a point at the safe visibility distance is visible to a driver seeking to turn out of the access.
42. Paragraph 5.17 of the TS suggests that measuring visibility to the centreline can be appropriate and refers to paragraph 10.5.5 of Manual for Streets 2 (MfS2) (Chartered Institution of Highways and Transportation, September 2010). This states:

'10.5.5 Some circumstances make it unlikely that vehicles approaching from the left on the main arm will cross the centreline of the main arm – opposing flows may be physically segregated at that point, for example. If so, the visibility splay to the left can be measured to the centreline of the main arm' (MfS2, para. 10.5.5)
43. There is no physical segregation on the lane and it is therefore possible that a vehicle could be approaching on the wrong side of the road. Indeed, vehicles, including motorcycles may cut the corner (or be forced onto the southern side of the road by parking on the northern side) and thus be more likely to completely or partially obscure the view to the north. The visibility to the kerb rather than to the centre of the road is measured as 33.3m, significantly less than the safe minimum.
44. The following photograph, taken on site, shows the view to the left from the site access from a point 2.4m back from the give-way line:

²Paragraph 5.18 of the TA suggests that visibility could be achieved either by relocating the wall behind the visibility splay as indicated on Drawing 3001 Rev. P01 or by reducing the height of the wall to 0.9m. The latter would not be acceptable since visibility splays should be entirely within highway land. The wider verge created by relocating the wall behind the visibility splay would need to be adopted as highway.

Photo 1: Visibility to the Left for Driver Leaving the Site



45. It is clear from the photograph that visibility is restricted by the presence of a high wall.
46. The drawing in Appendix E includes a note relating to the visibility splay to the north stating, '*On street parking potentially obstructing visibility*'. The photograph above shows a car parked within on the visibility splay. It is understood that up to three vehicles can be parked partly on the footway and partly on the carriageway on the section adjacent to the wall shown above. These vehicles lead to a significant blind spot that inhibits the ability of a driver leaving the site to see oncoming vehicles.
47. This safety issue is not discussed in the body of the report and no measures are proposed to ensure that the visibility splay is kept free of obstruction. A vehicle or vehicles parked in this area will significantly reduce visibility and lead to an unacceptable highway safety impact. The issue engages Paragraph 116 of the NPPF that states, '*Development should only be refused on highway grounds if there would be an unacceptable impact on highway safety...*'.
48. On the basis of the above, it is concluded that it is not possible to provide safe visibility splays for the proposed access and the proposed development should therefore be refused on highway safety grounds.
49. It should be noted that the proposed development will lead to a very substantial intensification of use of the access compared to its former agricultural uses. The agricultural buildings are associated with Manor Farm whose land lies to the west of the site. Much of the day-to-day activity would therefore have been between the

buildings and land to the west via the existing farm track that leads to the fields. These movements would not have used the access onto the lane.

50. Notwithstanding the use of the farm track, the number of cars using the access would be far in excess of the number that might be associated with agricultural uses and the proposed light industrial uses will generate larger vehicles. The site would also attract larger vehicles associated with deliveries and servicing. There is not a compelling argument that the proposed development would lead to a reduction in the level of use compared to historic levels.

Parking

51. The TS does not provide any detail on the proposed parking provision except to state that, *'the development will comply with the relevant [Wiltshire Council] parking standards and guidance'* (para. 5.26 of TS).
52. A parking standard of one car parking space per 30sqm of development is cited as the current standard for offices. The proposed development has an area of around 951 sqm (see Section 6 of TS). This would require around 30 car parking spaces.
53. The only realistic spaces that could be used for parking are those between the buildings bordering the northern and southern boundaries of the site. These spaces could accommodate an absolute maximum of around 20 spaces albeit with sub-standard manoeuvring space. It is likely that the requirements to gain access to the buildings would reduce this figure significantly.
54. It is concluded that the planning application boundary does not provide sufficient space to accommodate the necessary level of parking and is likely to lead to unsafe parking on the access road or on the external highway.

Conclusion

55. This Technical Note reviews transport information submitted in support of a planning application relating to a change of use of agricultural buildings at Manor Farm, Sopworth.
56. Scrutiny of the methodology used to derive peak hour car trip generation rates for the proposed development is likely to under-estimate the number of vehicles generated because the sites where observations have been undertaken are either at the edge of towns or in neighbourhood centres rather than in isolated rural locations comparable with the proposed development.

57. The applicant has undertaken no assessment of the possible level of generation of larger vehicles associated with the site.
58. The site has extremely poor levels of access by sustainable modes. The site would be almost entirely car-dependent.
59. The lanes providing access to the site are used by vulnerable highway users (pedestrians, cyclists and equestrians) and include sections that are of insufficient width to allow a vehicle to pass while allowing a safe margin of separation. The introduction of a significant generator of additional vehicle movements in this location raises highway safety concerns.
60. The visibility splay to the north from the site access is measured to the centre of the road rather than to the nearside kerb as would normally be the requirement. This approach is not justified and creates a blind spot that has adverse highway safety implications.
61. The applicant fails to acknowledge that vehicles park within the proposed visibility splay to the north. This is a serious highway safety issue.
62. The deficiency of visibility to the north represent an unacceptable highway safety impact. The application should be refused on this basis in accordance with Paragraph 116 of the NPPF. Further highway safety concerns relate to the conflict between site generated traffic and vulnerable highway users on the surrounding narrow lanes.
63. The site area as defined by the application red line falls far short of that required to accommodate the level of parking that would need to be provided to meet relevant standards. It is likely that site users would be forced to park in inappropriate and potentially dangerous locations.
64. Overall it is concluded that the proposed development is unacceptable for highway safety reasons (NPPF Paragraph 116) and fails to comply with policy requiring safe and suitable access (NPPF Paragraph 115) and policy that seeks to deliver sustainable development in transport terms (NPPF Paragraphs 109, 110, 115 and 117).