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PROPOSED RESIDENTIAL CARAVAN PITCH AT THE BANKS.
BRADENSTOKE, WILTSHIRE SN15 4ES

Access Review

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Transportation Planning, Highway Design and Environmental Assessment

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1 INTRODUCTION

1.1 Planning Application PL/2025/09420 for “Change of use to a Gypsy and Traveller site and associated works including the stationing of a residential lorry as 1 no. mobile home, and demolition of stables and the erection of a day room for use as ancillary storage, utility room and PV installation (partially retrospective)” at The Banks was refused planning permission by Wiltshire Council on 04/03/2026 for 4 reasons.

1.2 The 3rd reason for refusal states: *“The proposed development, by reason of its siting, layout and visibility, fails to achieve a safe and satisfactory standard of access. Any increased use made of the existing sub-standard access generated by the proposed development would be prejudicial to road safety. As such, the proposal is contrary to Core Policies 57(xiv), 60 and 61(ii) of the Wiltshire Core Strategy and Paragraphs 115 & 116 of the National Planning Policy Framework (NPPF)”*.

1.3 The Hurlstone Partnership Limited was instructed to review the planning history of the site and consider the acceptability of the existing access to serve the proposed development by the applicant, Mr. J. Grisley.

1.4 Having considered the history of the site, the established, historic access used to serve the land and established stables, the information submitted with the refused planning application and the characteristics of the local road network, new traffic / speed surveys were commissioned, and a site visit was undertaken.

1.5 The remainder of this report details the findings of the review and concludes that subject to the imposition of reasonable and deliverable planning conditions being imposed upon a planning permission, the proposed access would be acceptable to serve the development and would deliver a level of betterment when compared with the current situation.

2 PLANNING HISTORY

2.1 As the Officer Report for the refused planning application confirms:

“The site features changes in levels and a varied topography. A significant portion of the land comprises grassland; there is a pond adjacent to the site to the southeast. An existing stable building and an area of hardstanding is also present. It is clear from historical satellite imagery that these elements have been in place more than 10 years before the application was submitted.

At the time of site visit, an extension of the hardstanding, and a long farm track along the wider agricultural parcel have been observed. There is a large lorry parked on the extended area of hardstanding, and a horsebox is positioned at the end of the farm track to the southwest. There is also paraphernalia in some areas of the site close to the hardstanding. These works and use are unauthorised. The assessment of this application will not be based on these unauthorised works, and the baseline will be on the lawful agricultural use

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of the site, including the stable building, the immediate area of hardstanding and presence of the pond, with the remainder of the agricultural parcel as grassland prior to the unauthorised works."

A review of historic Street View images on Google Maps confirms the existing site access was in place in May 2009, as was the stable building and its associated hardstanding. The imagery also shows what appears to be a white storage / shipping container beyond the hardstanding area.

It is therefore apparent that the access, stables and use of the site have been established for a significant period of time. It is understood that stabling on the site has existed since the 1970s.

- 2.2 It is noted that the Highway Authority's objection to the refused development was underpinned by a presumption that *"It is my opinion that introducing a residential use would result lead to an increased use of a substandard access as daily use would lead to far more movements than occasional visits to an agricultural site."*

If permitted this will legitimise a residential use which could lead to more units and a significant increase in daily movements through an access considered substandard due to visibility splay being considered insufficient to secure safe access.

For the 10 years preceding the closure of the B4069 in 2022 there were 4 personal injury accidents one of which was severe within the area close to the proposal site.

For these reasons I would not be inclined to accept a significant reduction in visibility splay to allow a residential access to be formed."

- 2.3 At present, there are three stables on site. As far as we are aware, there is no planning condition limiting the use of the stables to a single individual or to prevent them being rented out to different people. In addition to the stables, there is also the land within the site.

- 2.4 The stables alone could attract comparable traffic movements to a single residential pitch. It is not unusual for horses to be visited two or three times per day for feeding, mucking out etc. Therefore, even if all three stables were used by one person, 6 movements per day could easily occur. Should somebody have a mare (or mares) in foal, more daily visits could be expected.

- 2.5 If each stable were used by horses under the care of different individuals, the daily trips would multiply. For example, even assuming just a visit in the morning and evening, three stables could attract 12 movements at the site access per day, which would be a very high trip rate for a single dwelling / gypsy / traveller pitch.

- 2.6 Absent any residential accommodation within the site, these routine visits to care for horses would be expected every day. By contrast, if animals within a site are cared for by a resident living on-site, over an extended period it is often found that a reduction in movements through the access can occur, because people do not necessarily go out every day of the week or necessarily make multiple trips per day. Often, movements at weekends can be

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lower than Monday to Friday, resulting in a lower overall flow over the full week, month or year when compared with the daily visits to care for animals that would otherwise be necessary if living remotely from the site / stables.

- 2.7 On this basis, the assessment of the impact of the proposed development by the Highway Authority, which was relied upon by the Planning Officer when refusing planning permission, is flawed when considered in the context of the stables on site, as opposed to the occasional visits to an agricultural site that the Highway Officer assumed to be the baseline comparator use.
- 2.8 Notwithstanding this, Mr. Grisley does not keep horses on site, and it is his intention to use the stables as a day room. It is therefore apparent that contrary to the responding Highway Officer's opinion, through the imposition of reasonable planning conditions regarding the use of the land and stables only to the resident occupants of the land, which Mr. Grisley confirms would be acceptable to him, the proposed development provides the opportunity to limit and reduce traffic movements through the access, which can only be considered to represent betterment, irrespective of its design standard.
- 2.9 A planning condition could also be imposed requiring the maintenance of visibility splays at the established site access, which would also provide betterment in terms of highway safety when compared with the fall-back use of the land.
- 2.10 As a result, rather than resulting in a detrimental impact on the highway network, the proposed development offers the opportunity to improve safety compared with the existing situation.
- 2.11 It is also noted that the Highway Officer highlights concerns regarding the potential increase in units at the site in the future. This was not a concern raised by the Planning Officer in the Officer's Report, in recognition that each application must be assessed on its own merits, not on the basis of speculation in terms of what further applications may come forward in the future, which would also be considered on their own merits if and when appropriate.
- 2.12 Having considered the basis of the Highway objection which underpinned the third reason for refusal, it is concluded that it is fundamentally flawed. When considered in the context of the established and alternative use of the land, it is apparent that the proposed development could provide betterment and should not have been refused on highways grounds.
- 2.13 Notwithstanding this, for completeness and to provide reassurance that the site access is acceptable, a detailed review of it has been undertaken in the context of empirical data and relevant design guidance; the findings of which are reported in the following sections of this Access Review.

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- 3 EXISTING ACCESS
- 3.1 The existing site access extends approximately 15m along the southwest side of the B4069 between its tangent points with the road edge, within which approximately 13m is surfaced in loose gravel / road planings. The access narrows as it extends to the 4.2m wide gateway, which opens into the site from its position set back approximately 5.3m from the road edge, on a descending gradient.
- 3.2 In the vicinity of the access, the width of the B4069 is 6.6m. There are white line edge markings inset approximately 0.3m from each edge, leaving a 6m wide running lane divided by an intermittent centreline.
- 3.3 The route is an undulating, meandering rural carriageway subject to a 60 mph speed limit, which descends from a right-hand bend to the northwest of the access to a left-hand bend to the southeast when travelling southbound along the route. The left-hand bend to the southeast sits in a dip whereas the right-hand bend sits on a crest, with the carriageway climbing and falling as it continues beyond these bends respectively. The gradients of the route in the vicinity of the access are approximately 4.3% downhill from the northwest and 3.1% uphill from the southeast.
- 3.4 Warning signs alert drivers to the bends ahead with supplementary advice "REDUCE SPEED NOW", with further associated road-markings "SLOW" with transverse bars across the traffic lane. The bend to the north of the site access is also highlighted by chevron boards facing both directions. There are also free-standing signs provided to alert road users to the uneven road surface in the area.
- 3.5 Visibility was measured on site using traffic cones and a road wheel. From the preferred 2.4m set-back distance, the visibility splay to the right (southeast) extended approximately 107.4m to the nearside edge, 103.7m to the centreline of the near (oncoming) traffic lane and 98.4m to the centreline of the carriageway, as illustrated in the following photograph.

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- 3.6 Forward visibility from a vehicle waiting to turn right into the site access to towards oncoming northbound traffic was found to extend 88.5m as illustrated below:



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3.7 As the photographs above illustrate, the constraint to visibility to the right (southeast) was the hedge / vegetation on the inside of the bend on the opposite side of the road to the access.

3.8 In terms of the visibility to the left (northwest) the splay from the same position extended 32.5m to the nearside edge, 48.5m to the centreline, 54.0m to the centreline of the far (oncoming) traffic lane and 58.5m to the far edge, based on the minimum driver's eye height of 1.05m to an object height of 0.6m.



3.9 As the photograph above illustrates, the embankment of the verge forms the main constraint to visibility to the left of the access, Forward visibility towards the front of a vehicle at the site access extended 60.6m due to the reduced impact of the verge closer to the road edge.

3.10 For comparison purposes, the visibility to the left (northwest) was also checked based on an object height of 1.05m, which represents the minimum intervisibility between drivers of vehicles. It was found that the distances increased to 38.3m to the near edge, 52.0m to the centreline, 56.5m to centreline of the far (oncoming) traffic lane and 62.3m to the far edge of the carriageway.

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4 EXISTING TRAFFIC

- 4.1 To establish existing traffic flows and speeds, 2 No. Automatic Traffic Counters (ATCs) were installed on the B4069. Site 1 was fixed to the chevron board located on the southeast side of the access on the bend to the north, at the far end of the visibility splay to the left / northwest. Site 2 was fixed to the hedge immediately southeast of the neighbouring gateway to the southeast of the site access, towards the far end of the visibility splay to the right / southeast.
- 4.2 The ATCs recorded continuously for 24 hours per day over the 7 day period between Tuesday 30th June and Monday 06 July 2026 inclusive.
- 4.3 The summaries of the ATC data are provided at Appendix A for information.
- 4.4 A review of the survey data reveals that the B4069 is a relatively lightly-trafficked route, with the total daily flows ranging between 2431 and 3983 vehicles across the Sites. The 7day averages at each site were 3349 at Site 1 and 3339 at Site 2, whilst the 5 day (Monday to Friday) averages were 3733 at Site 1 and 3716 at Site 2.
- 4.5 The proportion of large vehicles (HGVs and Buses) was found to be 1.6% at Site 1 and 1.48% at Site 2 over the survey period.
- 4.6 The AM peak hour period occurred between 08:00 – 09:00 with average weekday (Monday to Friday) flows ranging between 308 and 366 vehicles between the count sites. The comparable PM peak hour periods fell between 16:00 – 17:00 with weekday averages of between 280 and 396 vehicles across the sites. The highest recorded hourly flow at any site during the survey period was 396 movements during the PM peak hour at Site 1 on Wednesday 01 July 2026.
- 4.7 In terms of the 85th percentile speeds recorded at the sites, the results are tabulated below:

Table 4.1 Recorded Dry Weather Speeds at Automatic Traffic Counter Sites

ATC	Northwest-bound		Southeast-bound	
	85 th % ile	Mean	85 th % ile	Mean
Site 1	39.5 mph	34.4 mph	37.3 mph	32.8 mph
Site 2	45.3 mph	40.3 mph	44.0 mph	38.9 mph

XX = Speeds Approaching Site Access

YY = Speeds Beyond Site Access

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5 HIGHWAY SAFETY

- 5.1 In order to review the safety performance of the site access, the Crashmap database has been interrogated. It is normal to consider a 5 year period, but as that includes the period when travel restrictions were imposed due to the Covid 19 pandemic, we normally add a further two years, giving a 7 year period between 2018 and 2024 inclusive from the most recent data available.
- 5.2 However, it is understood that the B4069 was closed to the southeast of the site access between February 2022 and 2nd April 2025 due to a landslip, which destroyed the road surface. As a result, the study period has been extended back to 2009, as it is known from Google Street View imagery that the site access existed at that time and appeared to be in use.
- 5.3 The review revealed that there had been no recorded personal injury accidents at the access between 2009 and 2024 inclusive.
- 5.4 Whilst it cannot be confirmed that the access existed prior to 2009 based on the information available, extending the search to the earliest time covered by the Crashmap database (1999), it is apparent that there have been no recorded injury accidents at the access location over the 24 year period.
- 5.5 The closest incident to the site access was near the track on the bend on the opposite side of road to the northwest in February 2005. There are limited details available, but it appears the points of impact were front to front, which suggests one of the cars involved strayed into the opposing vehicle's lane at the bend, in fine, dry, dark conditions.
- 5.6 In the event there is a feature of the highway network that results in compromised safety for its users, it is common to find a number of incidents at a location, which share common characteristics. The absence of recorded personal injury accidents indicates the routine movements to and from the site access has not led to unacceptable safety impacts, and the single vehicle incident on the bend in 2005 is not indicative of an inherent highway safety problem.

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6 DESIGN GUIDANCE

- 6.1 The speed survey data obtained on the B4069 provides a range of speeds between 37.3 mph and 45.3 mph at the 85th % ile level in the dry conditions during the speed surveys. As the B4069 is not a trunk road, in accordance with paragraph 1.3.2 of Manual for Streets 2 (MfS2) “...most MfS advice can be applied to a highway regardless of speed limit. It is therefore recommended that as a starting point for any scheme affecting non-trunk roads, designers should start with MfS” –emphasis as per paragraph 1.3.2 of MfS2.
- 6.2 As such, it is considered the guidance at paragraph 1.3.6 of Manual for Streets 2 is relevant, which confirms: “It is only where actual speeds are above 40 mph for significant periods of the day the DMRB parameters for SSD are recommended. Where speeds are lower, MfS parameters are recommended...Where there may be some doubt as to which guidance to adopt, actual speed measurements should be undertaken to determine which is most appropriate.”
- 6.3 The principle of applying MfS parameters where speeds are lower than 40 mph is reinforced in paragraph 1.3.7 in the context of rural areas: “Again, in these situations where speeds are lower than 40mph, MfS SSD parameters are recommended.”
- 6.4 Based on the recorded speed data, it is therefore apparent that to the northwest (left of the site access) the application of MfS principles is confirmed, whereas to the southeast (right of the site access) if applying the speed threshold, it could be concluded that the DMRB parameters are appropriate. This approach would suggest that within the length of around 150m along the same road with the same general characteristics, the design parameters used would change significantly based on driver and vehicle performance, purely because the speeds cross the 40 mph threshold.
- 6.5 However, it is important to understand the basis of this threshold, which paragraph 1.3.5 of MfS2 explains: “Much of the research behind MfS1 for stopping sight distance (SSD) is limited to locations with traffic speeds of less than 40mph and there is some concern that driver behaviour may change above this level as the character of the highway changes.”
- 6.6 There is no evidence to suggest that driver behaviour does change above 40 mph, only a concern that it may do so. However, neither DMRB nor the Highway Code indicate a change in driver behaviour or performance as speeds transition from below 40 mph to above 40 mph. DMRB assumes a driver perception/reaction time of 2 seconds throughout the speed ranges considered between 50 kph (31.1 mph) to 120 kph (74.6 mph). By way of comparison, the Highway Code assumes a drive perception/reaction time of 0.67 seconds throughout the speed range from 20 mph to 70 mph it considers. Manual for Streets adopts a 1.5 second perception/reaction time base on research undertaken by the Transport Research Laboratory (TRL), as set out in TRL Report 332 “Road layout design standards and driver behaviour Prepared for Quality Services (Traffic, Safety and Environment) Division, Highways Agency”.
- 6.7 The study utilised a simulator to measure driver behaviour and response, which was described as follows within the TRL Report:

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"The simulated road scenes were generated by the imaging software used in the TRL driving simulator. They were based on a local single carriageway road close to the Laboratory. This is a road of trunk road standard through undulating country, having a roundabout junction mid-way along its length and several side roads joining at various points. It was possible to provide a limited range of driving conditions by varying the volume of opposing traffic, by adding complexity to the scene in the form of traffic warning and direction signs, and by providing some sections with a simulated urban environment. As described in the following section, four traffic hazards were presented to drivers, two either side of the central roundabout junction."

- 6.8 It is therefore apparent that the basis of the research included a trunk road standard route through undulating country...and by providing some sections with a simulated urban environment. All of the route characteristics influenced the results which led to the 1.5 second perception reaction time being established, which is significantly longer than the 0.67 seconds adopted when drivers are confronted with an emergency situation, such as a fear of crashing.
- 6.9 There are two primary sources of national highway design guidance. One is the Design Manual for Roads and Bridges (DMRB), which is written for the strategic trunk road network; and the other, is Manual for Streets/Manual for Streets 2 (MfS1/MfS2).
- 6.10 In terms of visibility requirements, DMRB and MfS take a different approach to the required length of the appropriate visibility splay lengths at accesses and junctions.
- 6.11 The lateral visibility at an access or junction is the distance a driver emerging from the minor arm of a junction or access can see to the left and right (Y distance). There are also variations between the guidance documents regarding the set-back distance from which the emerging driver can see along the main road (X distance). Forward visibility is the distance a driver travelling along the main road can see ahead of them towards a potential hazard, such as a stationary vehicle etc, but it is also based on the appropriate Y distance.
- 6.12 The Y distance is dictated by the speed of travelling along the priority route and is not affected by the scale of development or flow on the minor arm/access in terms of the design guidance. Effectively, whether an access/junction accommodates 100 or 1000 movements per day on the minor arm, the Y distance does not change as it is predicated on the speed of traffic on the main/priority route.
- 6.13 In terms of the Y distance and forward visibility splays, DMRB is based on a requirement to maintain a continuous traffic speed on the priority route, on which emphasis is placed on the trunk road network, where traffic volumes are higher, as confirmed at paragraph 9.4.7 of MfS2: *"TD 42/95 recommends that consideration should be given to providing a right turning lane at priority junctions where the side road flow exceeds 500 vehicles per day, but this advice relates to trunk roads where there is an emphasis on providing an unimpeded route for through traffic. It is a relatively low flow, and junctions without right turn lanes will often be able to cater for higher levels of turning traffic without resulting in significant congestion."* (Emphasis added).

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- 6.14 The purpose of the Y distance dimension within DMRB is also explained in the now withdrawn TD 41/95 *“Vehicular Access to All Purpose Trunk Roads”* at paragraph 2.17, which states *“Visibility splays shall be provided to enable emerging drivers using the direct access to have adequate visibility in each direction to see oncoming traffic in sufficient time to make their manoeuvre safely without influencing the major road traffic speed.”*
- 6.15 As confirmed in paragraph 7.5.4 of MfS1 *“The desirable minimum SSDs used in the Design Manual for Roads and Bridges are based on driver perception-reaction time of 2 seconds and a deceleration rate of 2.45 m/s² (equivalent to 0.25g where g is acceleration due to gravity (9.81 m/s²)). Design Bulletin 32 adopted these values.”*
- 6.16 Paragraph 7.5.5 of MfS1 continues: *“Drivers are normally able to stop much more quickly than this in response to an emergency. The stopping distances given in the Highway Code assume a driver reaction time of 0.67 seconds, and a deceleration rate of 6.57 m/s².”*
- 6.17 Paragraph 7.5.6 of MfS1 advises: *“While it is not appropriate to design street geometry based on braking in an emergency, there is some scope for using lower SSDs that those used in Design Bulletin 32...”*. At the third bullet: *“carriageway surfaces are normally able to develop a skidding resistance of at least 0.45g in wet weather conditions. Deceleration rates of 0.25g (the previously assumed value) are more typically associated with snow-covered roads.”*
- 6.18 By contrast, when considering the requirement for vehicles to actually stop, rather than maintain a continuous speed, paragraph 7.41 of the now withdrawn TD 42/95 *“Geometric Design of Major/Minor Priority Junctions”* confirmed the basis of the deceleration length within the right-turn lanes, within which vehicles on the trunk road are expected to slow down and stop safely, to wait for a gap in the oncoming traffic stream, through which to turn right into the minor arm. It confirms: *“The deceleration lengths can be seen on Figs 7/4, 7/5 and 7/6. The deceleration lengths are based on the assumption that vehicles will slow down by one design speed step on the trunk road before entering the length. The deceleration rate on the level is assumed to be 0.375g. There is no reaction time as this is a planned manoeuvre.”*
- 6.19 Although both TD 41/95 and TD 42/95 have been withdrawn and superseded, the Y distance for any given design speed in Table 7/1 of TD 42/95 is identical to those in Table 2/1 of TD 41/95 and Table 2.10 of CD 109 *“Highway link design”* to which section 3.4 of CD 123 *“Geometric design of at-grade priority and signal-controlled junctions”* refers readers for visibility requirements in terms of the Y distance.
- 6.20 CD 123 replaced TD 41/95 and 42/95 (amongst others) but carried forward the visibility splay lengths from its predecessors. This consistency also extends to the deceleration lengths in right turn lanes, as demonstrated by comparing Table 7/5a of TD 42/95 and Table 5.22 of CD 123. Unfortunately, CD 123 has omitted to provide the explanation of the basis of the deceleration lengths it references. This appears to be a common theme within the ongoing evolution of the updating of DMRB, which generally omits some key information from the text that assisted in understanding what underpins the trunk road design standards.

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- 6.21 Knowing the assumption of a 1 design speed reduction assumed to occur, prior to entering the right turn lane, as confirmed at paragraph 7.41 of TD 42/95, for the comparison between the published Y distances in Table 7/1 and the deceleration lengths in Table 7/5a of TD 42/95, in the latter it is necessary to refer to the design speed above that for the route in question. For example, to obtain the deceleration length for a design speed of 70 kph, it is necessary to refer to the row containing 85 kph in Table 7/5a, to allow for the fact that Table 7/5a includes an assumed reduction of 1 speed step before confirming the appropriate deceleration length.
- 6.22 The deceleration length from 70 kph (see 85 kph in Table 7/5a) is 55m except for uphill gradients above 4%. The actual figure calculated for the 70 kph (43.5 mph) design speed is 51.4m based on the specified rate of 0.375g, but as with most distances in the DMRB tables, it has been rounded up.
- 6.23 This may be compared with the 120m Y distance in the relevant Tables from TD 41/95, TD 42/95 and CD 109. However, as paragraph 7.41 of TD 42/95 confirms, the deceleration length does not include a reaction time, as it is a planned manoeuvre. Based on the 2 second perception / reaction time adopted by DMRB, a vehicle travelling at 70 kph (19.444 m/s) would cover 38.889m, which when added to 54.4m gives a total combined stopping distance of 90.289m; some 29.711m below the quoted Y distance of 120m for the same 70 kph design speed.
- 6.24 It is therefore demonstrably apparent that the Y distance splay lengths in DMRB provide for something other than safe stopping. As already confirmed by reference to the guidance, which demonstrates the increased distances provide for the continuous speed of traffic on the main road, as explained in paragraph 2.17 of TD 41/95 and paragraph 9.4.7 of MfS2 (see above).
- 6.25 MfS and TD DMRB documents used wet weather speeds as the basis for calculating visibility splay lengths. However, during the update of DMRB, CA 185 "*Vehicle speed measurement*", changed its approach and now requires dry weather, rather than wet weather speeds. Given vehicles stop faster on dry roads than wet roads, it is surprising that the Y distances were not amended at the same time as the DMRB approach; although, as previously stated, the DMRB Y distances are predicated on maintaining a continuous speed, not physically stopping, which may explain why the previous Y distances related to wet weather speeds remained in place.
- 6.26 Knowing that wet weather speeds underpinned the same DMRB distances and remains the relevant parameter upon which visibility requirements are calculated within MfS/MfS2 away from the trunk road network, and that the 0.25g deceleration rate adopted in the DMRB Y distance calculation relates to performance on a snow-covered road, also demonstrates the DMRB Y distances are for something other than safe stopping from the relevant 85th percentile wet weather speeds, as drivers tend to travel much slower on snow covered roads than merely wet routes. Therefore, their starting speed for the application of the 0.25g deceleration rate would be lower if it the calculated Y distance provided only for safe stopping based on the surface being covered in snow, rather than being wet or dry.

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- 6.27 Basically, the DMRB Y distance provides for a vehicle in an access or minor arm of a junction to turn onto the priority route and accelerate from rest up to the design speed without the oncoming driver travelling along the priority route reacting or varying their speed. That is to say the driver already travelling along the major road at a given speed does not alter their speed by lifting off the accelerator or braking. The identified splay therefore allows sufficient distance for the initial comparatively high closing speed between the vehicles together with the reducing closing speed as the emerging driver accelerates, without influencing the oncoming driver's speed or impeding the through traffic.
- 6.28 This principle is considered important on trunk roads, the most important national strategic routes below Motorways, where there is a desire to maintain the speed of long-distance through-traffic for capacity and safety reasons. On non-trunk roads or lower order routes with less strategic importance, this consideration is less critical. In many cases, the natural reaction of a driver experiencing an emerging vehicle is to lift off the accelerator, which instantly nullifies the basis of the DMRB Y distance, as the oncoming speed has, at that point, been influenced.
- 6.29 Similarly, in the absence of a right turn lane on the priority route, as is the case at the accesses and junctions along the B4069, any vehicle approaching another waiting to turn right would need to stop before reaching it in order to avoid a collision. This is considered acceptable, even on trunk roads, as it is not a DMRB requirement to provide a right turning lane at every priority junction on the trunk road network.
- 6.30 By contrast, the principle of MfS considers the ability of a vehicle to stop safely in order to avoid a collision, as confirmed in paragraph 10.1.4 of MfS2: *"Stopping sight distance (SSD) is the distance drivers need to be able to see ahead and they can stop within from a given speed. It is calculated from the speed of the vehicle, the time required for a driver to identify a hazard and then begin to brake (the perception-reaction time), and the vehicle's rate of deceleration. For new streets, the design speed for the location is under consideration is set by the designer. For existing streets, the 85th percentile wet-weather speed is used"*. Very similar wording appears at paragraph 7.5.2 of MfS1.
- 6.31 It is this basic difference in approach to what is required in order to maintain an adequate level of safety for the differing circumstances, which differentiates the visibility splay lengths calculated using DMRB Y distance and MfS principles. The former provides for continuous through traffic speeds, whilst the latter provides for vehicles to stop safely in order to avoid a collision.
- 6.32 In this case, there is no expectation of or desire for speeds to be constant, due to the characteristics of the highway. The speed survey data also demonstrates that speeds are not consistent in the vicinity of the site access in either direction.
- 6.33 Therefore, there is no practical safety benefit designing for constant speeds where they naturally are not constant. The DMRB constant speed parameters are therefore irrelevant to safety in this case on the B4069.

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- 6.34 As the B4069 is not a trunk road, as quoted from paragraph 1.3.2 of MfS2 above, *“It is therefore recommended that as a starting point for any scheme affecting non-trunk roads, designers should start with MfS”*
- 6.35 MfS2 paragraph 1.3.3 advises: *“Where designers do refer to DMRB for detailed technical guidance on specific aspects, for example on strategic inter-urban non trunk roads, it is recommended that they bear in mind the key principles of MfS, and apply DMRB in a way that reflects the local context. It is further recommended that DMRB or other standards and guidance is only used where the guidance contained in MfS is not sufficient or where particular evidence leads a designer to conclude that MfS is not applicable.”*
- 6.36 Table 1.1 of MfS2 confirms that the Stopping Sight Distance (SSD) principle may be applied on routes subject to 40 mph and 50+ mph speed limits *“subject to local context.”*
- 6.37 Paragraph 1.3.9 advises *“This approach demonstrates that the key MfS principles can be applied widely to improve the quality of highways and their application is not limited to low speed or lightly trafficked routes.”*
- 6.38 The Presidential Foreword of MfS2 confirms: *“The Chartered Institute of Highways and Transportation’s new guidelines builds on the advice contained in MfS1, exploring in greater detail how and where its key principles can be applied to busier streets and roads in both urban and rural locations up to, but not including, trunk roads. Manual for Streets 2 – Wider Application of the Principles will help to fill the perceived gap in design advice between MfS and the design standards for trunk roads set out in the Design Manual for Roads and Bridges.”*
- 6.39 The Status and Application section on page 4 of MfS2 reiterates the point of the perceived gap in design guidance between MfS1 and DMRB.
- 6.40 Chapter 2 of MfS2 considers *“Networks, Context and Street Types”*. Section 2.8 _ Context – Rural Areas confirms at its sub-heading *“Common Street Type: Rural Roads and Lanes”*. Under the sub-heading *“Typical Characteristics”* it confirms at paragraph 2.8.2: *“There is a considerable variation in the highway network running through rural areas from motorways to Green Lanes. The majority of other rural roads follow old pathways and boundaries and do not conform to present guidance on highway standards. Indeed to do so could be to the detriment of local character and lead to intrusion into some of our most outstanding landscapes.”*
- 6.41 It is therefore clear that MfS2 does apply to all roads, as they are specifically referenced within the default guidance for non-trunk roads.
- 6.42 It is therefore concluded the application of MfS principles of designing for safe stopping is appropriate in this case, given speeds are not constant in the vicinity of the site access.

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- 6.43 MfS2 confirms that HGVs and buses have different rates of deceleration to cars and light vehicles at paragraph 10.1.7. Paragraph 10.1.9 confirms “...the pre-MfS1 Absolute Minimum value of 0.375g is recommended for HGVs”. However, paragraph 10.1.8 advises: “As a guide, it is suggested that bus/HGV SSD should not need to be assessed when the combined proportion of HGV and bus traffic is less than 5% of traffic flow, subject to consideration of local circumstances”.
- 6.44 In this case, the combined proportion of large vehicles (HGVs and buses) was found to be less than 2% at both of the ATC sites. Given the severity of the bends near the site access, large vehicles are likely to be travelling more slowly than light vehicles, particularly when taking into account the gradients of the road in the area.
- 6.45 Given the low proportion of large vehicles and speeds being below 40 mph from the northwest, in this case it is apparent that the relevant parameters for calculating the required SSD are a 1.5 second perception / reaction time and 0.45g deceleration rate for light vehicles.
- 6.46 Paragraph 7.5.9 of MfS1 confirms “Gradients affect stopping distances. The deceleration rate of 0.45g used to calculate the figures in Table 7.1 is for a level road. A 10% gradient will increase (or decrease) the rate by around 0.1g.”
- 6.47 As previously described, the B4069 descends from the northwest towards the access at a gradient of 4.3%.
- 6.48 By applying these gradients to the relevant approaches and recorded 85th percentile speeds corrected to wet-weather by deducting 4 kph (2.5 mph) in accordance with the recognised differential between wet and dry conditions¹, the SSD to the left of the site access is calculated to be 56.044m.
- 6.49 In terms of the SSD to the right of the site access, the corrected wet-weather speed of 42.8 mph and uphill gradient of 3.1%, based on the same MfS2 parameters for light vehicles, the comparable length is calculated to be 69.890m. However, as the speed is above 40 mph, should it be considered appropriate to switch to the DMRB stopping parameters of 2 seconds perception / reaction time and 0.375g deceleration rate, the equivalent distance becomes 88.021m.
- 6.50 It is unsurprising that the DMRB 0.375g deceleration rate for stopping is adopted within DMRB, as the strategic trunk road network carries comparably high numbers of large vehicles, being the main distribution and freight routes within the Country.
- 6.51 If adopting the same deceleration rate despite the low proportion of HGV traffic and guidance within MfS2 paragraph 10.1.8, applied with the 1.5 second perception reaction time and taking into account the uphill gradient from the southeast towards the access, the SSD is calculated to be 77.055m.

¹ TA 22/81 and its replacement CA 185

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- 6.52 By comparing the above distances with the visibility splays measured on site, it is apparent that when looking to the right (southeast) from the site access, the 107.4m nearside edge measurement exceeds all of the distances calculated above, as does the forward visibility towards oncoming traffic from a vehicle waiting to turn right into the access (88.5m). It is therefore apparent that the visibility to the right (southeast) of the access is acceptable.
- 6.53 In terms of the visibility splay to the left (northwest) there is a shortfall when compared with the desirable standards from the 1.05m driver's eye height. The calculated 56.044m requirement cannot be achieved to the near edge of the carriageway due to angle of the verge combined with the carriageway alignment. However, it is apparent that the distance is achieved within the width of the far (oncoming) traffic lane towards the object heights of both 0.6m and 1.05m.
- 6.54 Both MfS1 paragraph 7.7.5 and MfS2 paragraph 10.5.5 state: *"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."*
- 6.55 It is noted that physical segregation is not a requirement to make it unlikely that vehicle would overtake, but is an example of circumstances that may make it unlikely. Another example is where drivers cannot see oncoming traffic around a blind bend. The test for acceptance of the centreline measurement is "unlikely" not "impossible". This has been accepted by several Inspectors who have considered such circumstances at appeal, who have agreed it is not reasonable to be expected to design for irresponsible drivers.
- 6.56 For example, shortly after the publication of MfS2, Inspector Ruth Mackenzie allowed an application for a gypsy/traveller site comprising a 12 pitch site for 13 mobile homes and 13 tourers at Lowfield Paddocks, Stragglethorpe Lane, Fulbeck, Lincolnshire (Ref: APP/E2530/A/10/2136072), which was on a 60 mph route. The Decision of 4th March 2011 overturned the previous dismissal of an earlier Appeal by a different Inspector on highways grounds, due to the revised guidance in MfS2. Having considered the local context, including the proximity of the bend to the left of the site access, Inspector Mackenzie concluded at paragraph 17 of the Decision:
- "I accept that if a southbound driver were to undertake the dangerous manoeuvre of overtaking on a bend, the overtaking vehicle might momentarily disappear from the view of a driver emerging from the site. However, I consider that such a manoeuvre would be so dangerous that it would rarely take place and, if it did take place, the chances of it happening when a vehicle was emerging from the proposed access would be statistically very small. Indeed, it is an eventuality that in my opinion need not be critical to my decision-making. Moreover, I consider it unrealistic and impractical to expect the highway network to be designed to such a high specification that it can safely accommodate bad driving practices."*
- 6.57 A review of Crashmap data to 2024 confirms the Inspector's rationale was correct, as there have been no recorded personal injury accidents at the Lowfield Paddocks access up to the 2024 end date for which data is available.

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- 6.58 As reported in MfS2 at paragraph 3.1.8, the Highway Code provides advice to drivers to *“take the road and traffic conditions into account. Be prepared for unexpected or difficult situations, for example, the road being blocked beyond a blind bend. Be prepared to adjust your speed as a precaution...where there are junctions, be prepared for road users emerging.”* Paragraph 3.1.10 of MfS2 advises that drivers are responsible for their own safety and cites a ruling *“The overriding imperative is that those who drive on the public highway do so in a manner and at speed which is safe having regard to such matters as the nature of the road, the weather conditions and the traffic conditions. Drivers are first and foremost responsible for the own safety.”*
- 6.59 This principle is reflected in design guidance. For example, it is not necessary to provide a visibility splay to the left from a minor arm where vehicles turn left onto a dual carriageway. Nor is it necessary to design roundabouts on the assumption that drivers would be travelling the wrong way around them etc.
- 6.60 In terms of the Y distance, paragraph 10.5.3 of MfS2 advises: *“For simplicity it has previously been measured along the nearside kerb line of the main arm, although vehicles will normally be travelling at a distance from the kerb line. Therefore a more accurate assessment of visibility splay is made by measuring to the nearside edge of the vehicle track”.*
- 6.61 It is clear and logical that when assessing the potential for collisions, the key consideration is the ability of a driver to see another in good time to avoid a collision.
- 6.62 This is apparent when considering the research reported in section 10.4_Visibility at Priority Junctions in MfS2, which considered the relationship between collisions and restricted visibility. Under the sub-heading ‘Site Visits’, the research text provided on page 076 advises: *“Visibility was measured from a height of 1.05m, to a point at the kerb edge and a second point 1m out from the kerb edge, where observations showed that visibility increased”.*
- 6.63 This 1m inset distance is referenced within some Local Authority Design Guides² in recognition of the fact that it is the ability to see oncoming traffic that is the key consideration. Given neither cyclists nor motorcyclists travel along the kerb line at speed, when taking into account a reasonable offset from the kerb and the rider’s / vehicle’s inherent width, the likelihood of not being able to see at least part of an oncoming two-wheeler at a 1m distance is so slight as to be insignificant. Obviously, a car, van, lorry etc. is already wider than 1m so would be visible even if its nearside wheels were brushing the kerb.
- 6.64 This principle and practical application when considering visibility is relevant when considering the acceptability of the proposed site access. In this case the existence of a sharp, blind bend marked by chevron boards, over the crest of a hill makes it highly unlikely that any reasonable driver would overtake at that point when heading southeast-bound.

² Leicestershire County Council Highways Design Guide:
<https://www.leicestershirehighwaydesignguide.uk/highway-layouts-and-design/road-layouts-and-design/visibility-splays-and-bend-widening>

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Therefore, considering the visibility towards an oncoming vehicle within the far (oncoming) traffic lane from the access to its left is the relevant issue.

- 6.65 Towards an object height of 0.6m the target distance of 56.044m is achieved between the centreline of the traffic lane (54.0m) and the far edge of the carriageway (58.5m) from the minimum driver's eye height of 1.05m. However, as confirmed in paragraph 10.2.3 of MfS2: *"Checking visibility in the vertical plane is then carried out to ensure that views in the horizontal plane are not compromised by obstructions such as the crest of a hill, or a bridge at a dip in the road ahead. It also takes into account the variation in driver eye height and the height range of obstructions. Eye height is assumed to range from 1.05m (for car drivers) to 2m (for bus and HGV drivers)."*
- 6.66 Paragraph 10.2.4 of MfS2 continues: *"Drivers need to be able to see obstructions from 2m high down to a point 600 mm above the carriageway. The latter dimension is used to ensure small children can be seen."*
- 6.67 For a driver emerging from the site access, they do not need to be concerned with a young child approaching them along the B4069 at a speed of 34.8 mph. The concern is the ability to see oncoming vehicles and for drivers of oncoming vehicles to see the emerging driver. As such, considering the intervisibility between vehicles is more relevant.
- 6.68 At the minimum 1.05m driver's eye height, the distance of 56.044m is achieved to a target height of 1.05m between the carriageway centreline (52.0m) and the centreline of the far (oncoming) traffic lane (56.5m); increasing to 62.3m at the far edge of the carriageway.
- 6.69 As the driver's eye height increases, the verge to the northwest of the access has a reduced impact on visibility. Measurements on site confirmed that from a 1.50, driver's eye height at the site access, it was possible to see to 0.6m at the carriageway centreline, as it also is from the 2m specified in paragraph 10.2.4 of MfS2 above.
- 6.70 The visibility splays measured on site relative to the SSD distance established from the speed surveys are illustrated in Figure 1, which is provided in the Figures section of this report.
- 6.71 Given the severity of the bend and crest, a motorcyclist rounding the bend at speed would naturally place the vehicle wheels towards the far side of the carriageway to allow them to lean into the corner whilst avoiding placing their head into the opposing traffic lane. As a result, an oncoming motorcyclist would be seen.
- 6.72 A car, van or larger vehicle would be wide enough to occupy the majority of the far traffic lane and would therefore also be at least partially visible to the emerging driver, as illustrated in the photograph below taken from the 1.05m driver's eye height towards the 56.044m target distance.

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- 6.73 Larger vehicles are far more visible, as the following photograph illustrates, which highlights how the higher driver's eye heights improve visibility.



- 6.74 As previously reported, the forward visibility towards the access from vehicles heading southeast from the bend towards the access along the B4069 extends 60.6m to the 0.6m

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object height from the 1.05m minimum driver's eye height, which increases to 68.8m when looking towards an object height of 1.05m.

- 6.75 Notwithstanding this, the 1.05m minimum driver's eye height should also be considered in context, as it is relatively low and representative of a low vehicle, such as a sports car. In the majority of vehicles, the driver's eye height is significantly higher.
- 6.76 It was noted during the site visit that there were three vehicles parked on site; a Peugeot 107 hatchback, a Land Rover, and a Mercedes Sprinter Van. The driver's eye height within each vehicle was measured to be approximately 1.3m, 1.5m and 1.7m respectively, each of which provides an improved view over the verge when compared with the 1.05m height from which most measurements were taken.
- 6.77 A further consideration is the angle of the verge that forms the constraint to the left (northwest) of the access, as its height reduces towards the road edge. Therefore, as a driver leans forward or carefully edges out from the access, the visibility to their left improves.
- 6.78 Paragraph 10.5.8 of MfS2 advises: *"A minimum X distance of 2m may be considered in some slow-speed situations when flows on the minor arm are low, but using this distance will mean that the fronts of some vehicles will protrude slightly into the running carriageway of the major arm, and many drivers will tend to cautiously nose out into traffic. The ability of drivers and cyclists to see this overhang from a reasonable distance, and to manoeuvre around it without undue difficulty, should be considered. This also applies to lightly-trafficked rural lanes."*
- 6.79 This principle of nosing out cautiously is recognised in section "10.7_ Obstacles to Visibility of MfS2". Paragraph 10.7.1 states: *"Parking in visibility splays in built-up areas is quite common, yet it does not appear to create significant problems in practice. Ideally, defined parking bays should be provided outside the visibility splay. However, in some circumstances, where speeds are low, some encroachment may be acceptable."*
- 6.80 The example referred to illustrates a car pulling out of a side road where the visibility to the right is restricted by parked vehicles. It's accompanying text states: *"At urban junctions where visibility is limited by buildings and parked cars, drivers of vehicles on the minor arm tend to nose out carefully until they can see oncoming traffic, and vice-versa."*
- In the images above, the blue car moves forward slowly until it can see far enough past the parked vehicles to see that the gap to the next oncoming vehicle is long enough for it to pull out. Drivers on the major route will also be able to see the vehicle pulling forward slowly and may slow down or stop to allow it to pull out."*
- 6.81 In practical terms, it doesn't matter whether the obstruction to the visibility splay is parked vehicles, a building, a hedgerow or verge; if it blocks visibility, it blocks visibility. What is a key consideration is the ability of the oncoming driver on the major route to see the vehicle pulling slowly forward, such that the oncoming driver may slow down to stop and allow it to pull out.

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- 6.82 This principle of the oncoming driver being able to stop safely is the key consideration when assessing visibility requirements, as it is the oncoming vehicle speed on the priority route from which the SSD is calculated, not that of the emerging driver.
- 6.83 This is reflected in the findings of the research previously mentioned, which is reports in section “10.4 _ Visibility at Priority Junctions” of MfS2. Paragraph 10.4.2 advises: *“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.”*
- 6.84 The conclusions of the research provided on page 077 of MfS2 advise: *“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.”*
- 6.85 As is apparent from the findings of the research, there was no correlation between reduced visibility from the emerging drivers perspective and collisions at high risk sites where the drivers on the priority road had good forward visibility.
- 6.86 This is unsurprising, as there are few drivers who would fail to react to a vehicle cautiously nosing out into a road, in the event they believed a collision was likely to occur, should they fail to do so. Only an unreasonable, irrational and dangerous driver would fail to try and avoid an accident taking place if it were avoidable. The same principle applies should a driver emerging from an access stall mid-manoeuve, leaving them stationary on the carriageway. The key consideration is whether the oncoming driver has sufficient forward visibility to see the potential hazard and react to it as appropriate, which, in the case of the calculated SSD is the ability to stop safely to avoid a collision if necessary.
- 6.87 In this case, the forward visibility towards a vehicle waiting at the site access is good in both directions. However, a vehicle edging forward would only affect the nearside lane and therefore vehicles approaching from the right (southeast). As has been established the visibility to and from the southeast significantly exceeds the SSDs calculated based upon the recorded traffic speeds. Therefore, a driver emerging from the access could check the road is clear to the right before carefully edging out to obtain an improved view to the left, safe in the knowledge that a vehicle approaching from the right that may arrive whilst undertaking the manoeuvre would have more than sufficient visibility to slow down or stop, if necessary, as would any vehicle approaching from the left (northwest).
- 6.88 Having considered the foregoing, it is unsurprising that the existing, established site access has such an excellent safety record, as in practical terms the intervisibility between it and oncoming traffic is demonstrably satisfactory when taking into account the local context at

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the minimum 1.05m driver's eye height, despite it falling below desirable standards in terms of the near edge measurement etc.

- 6.89 Whilst it is apparent that visibility at the existing access that would serve the proposed development may not accord with desirable standards, that does not mean it is unsafe or unacceptable.
- 6.90 The review undertaken has considered empirical speed data and the local context, which provided sound reasons and explanations why the access has a good safety record despite, what on first inspection, may be considered shortfalls in requirements to maintain safety.
- 6.91 The guidance in MfS2 encourages the reader to think about the local context in a flexible, pragmatic way. It is critical of the approach of some practitioners at paragraph 3.2.1 which states: *"For some time there have been concerns expressed over designers slavishly adhering to guidance regardless of local context."*
- 6.92 The document goes on to state in the following paragraphs *"Designers are expected to use their professional judgement when designing schemes and should not be over-reliant on guidance....Available guidance is just that, guidance, and cannot be expected to cover the precise conditions and circumstances applying at the site under examination....The authors of guidance, how ever accomplished, will not be cognizant of the site and situation in question. It would be neither reasonable nor rational to presume that anyone could produce an optimal design in abstract. The informed judgement of trained professionals on-site, should logically take precedence over guidance"*.
- 6.93 Specific guidance is given for rural areas at section 2.8 of MfS2, which states at paragraph 2.8.1: *"Rural roads are an integral part of the landscape, often reflecting and preserving historic landscape features such as ancient routes or field boundaries and set within outstanding countryside. Elements such as hedges, verges, banks and fingerposts may contribute strongly to local character and historic significance."* MfS2 Paragraph 2.8.2 I referred to previously is also relevant.
- 6.94 MfS2 refers to DCC's good practice advice, with the following text: *"Junction improvements will only be considered where there is a proven safety need...There should be a presumption of retaining trees hedges and verges including any central grass areas...If a traditional Devon hedge needs to be removed for the realignment of a road, the practicality of translocation/moving the hedgebank should be considered in the first instance. Where this is not feasible, the next option should be to carefully dismantle and reconstruct the hedge. Archaeological recording and supervision may be required."*
- 6.95 As is clear, MfS2 seeks to steer away from the slavish adherence to guidance and encourages practitioners to think about the circumstances of the case, the local context and evidence, based on actual safety records.

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- 6.96 As paragraph 10.5.9 of MfS2 advises *"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."*
- 6.97 The evidence in this case demonstrates that the use of the site access has not led to unacceptable safety impacts. The review undertaken provides an explanation why that is the case. Given the evidence of the historic and ongoing use of the access and the findings of the review, it is apparent that the access has and should continue to operate safely. There is no reason to believe that the movements associated with a single pitch residential site would result in unacceptable safety impacts when considered in context.
- 6.98 This evidence-based approach is reiterated in an article contained in the November 2010 edition of Transportation Professional, the magazine of the Chartered Institution of Highways and Transportation. The Cover Story article *"Manual for Streets 2"*, which quotes Alan Young, the principal author of MfS1 and MfS2: *"The advice is to look at speed first, then detailed assessment of local context and vehicle and pedestrian collision records. If there is a problem of safety, deal with it as appropriate; if collision records are acceptable, avoid rigorous following of standards and focus on the quality of the place,"* says Mr. Young." The article concludes with a further quotation *"This research combined with what's been recognised before suggests greater visibility could be increasing hazards, but the important message is do not get hung up on standards. Be flexible and make decisions based on evidence."*
- 6.99 This advice supports the conclusion that the visibility at the site access is acceptable in this case. It is therefore recommended that planning conditions be imposed to protect 2.4m x 32.5m visibility splays to the north and 2.4m x 107.5m to the south measured from the access centreline to the nearside edge of the carriageway (for simplicity of monitoring).
- 6.100 The flexible, evidence-based approach, which takes into account local context, as advocated by MfS2 explains why the access operates safely. The assessment revealed that the proposed development would deliver safety benefits when compared with the established use of the land
- 6.101 Paragraph 116 of the National Planning Policy Framework states: *"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, following mitigation, would be severe, taking into account all reasonable future scenarios."*
- 6.102 The proposed development would not breach the highway thresholds of unacceptability set out in National Policy and therefore planning permission should not be prevented or refused based on adverse and / or unacceptable highways impacts.

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7 POTENTIAL IMPROVEMENTS

- 7.1 Whilst it has been found that the proposed development is acceptable and provides potential highway safety benefits through the anticipated reduction in traffic movements and ability to control and maintain acceptable existing visibility splays, the review revealed that further low-cost improvements could be achieved via a planning permission at the site to deliver further betterment when compared with the current situation.
- 7.2 The existing site access is surfaced in a loose material (road planings / gravel). It is recommended that the access be resurfaced in a sealed, bound material (asphalt, concrete or similar), which would improve traction for vehicles entering and leaving the site. It is recommended that this be extended to the gate (5.3m) from the carriageway edge and potentially beyond the gate, as it is common for the initial 6m of accesses to be surfaced to avoid loose material being deposited onto adjoining roads.
- 7.3 It was also noted on site that there is a high spot / ridge within the verge area, extending between approximately 11m to 15m northwest of the access centreline, as illustrated in the following photographs:



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- 7.4 As this high spot / ridge is one of the main constraints to visibility and could easily be addressed, it is recommended that it be removed by re-grading the relevant area of the verge so that it forms a consistent profile with that to either side, in order to maximise the view to / from the northwest of the site access over wider range of driver's eye and object heights.
- 7.5 The potential further improvements are illustrated in Figure 2 within the Figures section of this report.

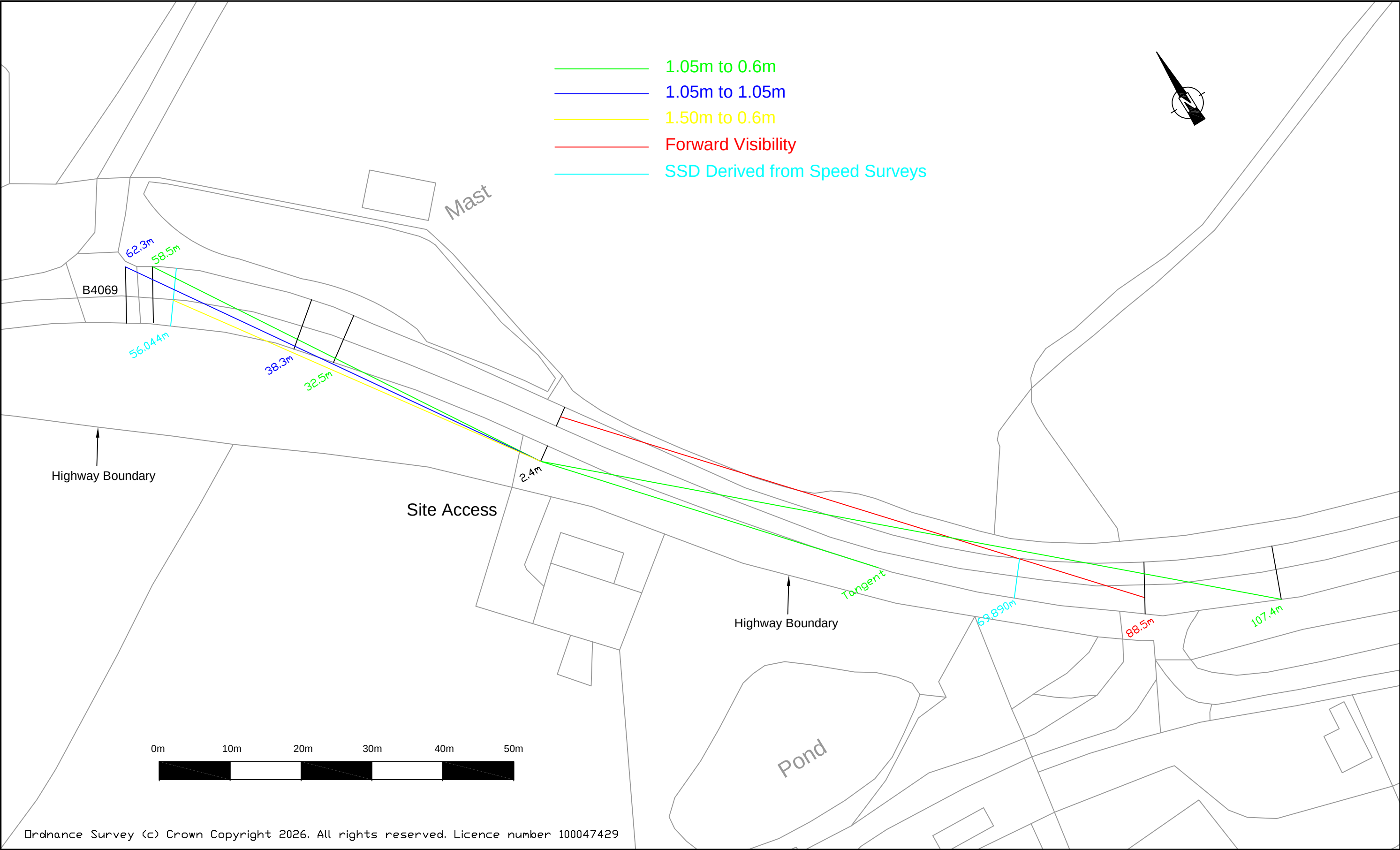
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9 SUMMARY

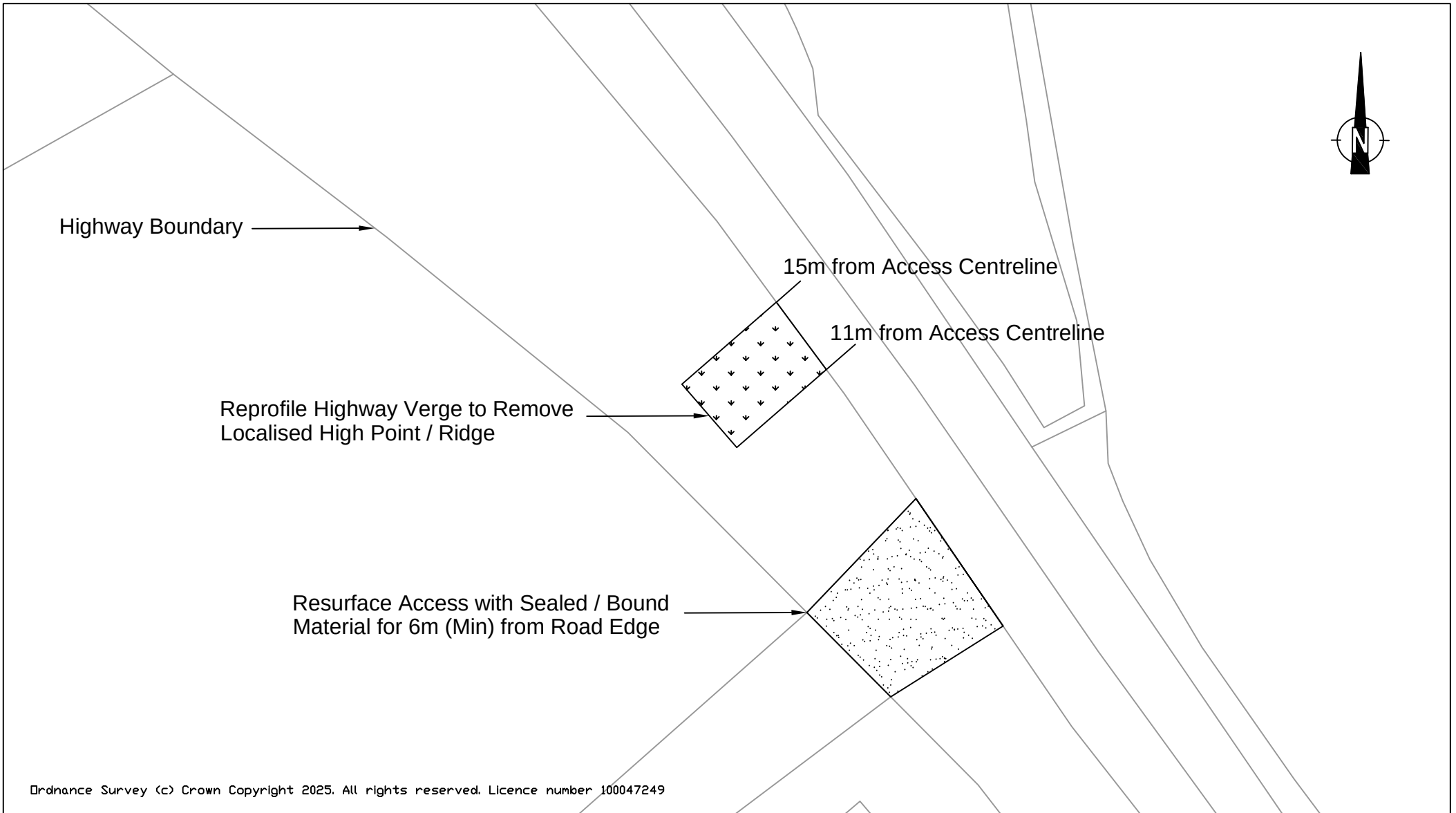
- 9.1 The Hurlstone Partnership Limited was instructed to review the access arrangement to The Banks and consider its suitability to serve a single residential gypsy / traveller pitch. As part of the study, the planning history of the site was reviewed together with empirical traffic data, collision data, current design guidance and planning policy.
- 9.2 A previous planning application for the proposed development was refused permission partly for highway reasons.
- 9.3 Having considered the history of the site, the established, existing access used to serve the land and stables, together with the information submitted with the refused planning application, it was found that the proposed development offers the potential for highway safety betterment through the imposition of planning conditions relating to the use of the land and the maintenance of visibility splays when compared with the established use.
- 9.4 In such circumstances, in accordance with paragraph 116 of the National Planning Policy Framework, permission should not be prevented or refused on highways grounds.
- 9.5 Notwithstanding this, the review also identified further, low cost improvements to deliver further highway safety benefits, including the re-profiling of an existing high point / ridge within the verge area to the northwest of the access, and providing a sealed surface at the access to provide improved traction and reduce the potential for loose material to be conveyed to the surface.
- 9.6 The review also included a detailed review of visibility on-site based on the recorded speed data.
- 9.7 It was found that whilst the existing access may not achieve full desirable standards, the existing visibility met the requirements necessary to maintain highway safety in both directions when taking into account the local context and flexible, evidence-based approach it advocates. This conclusion was supported by the absence of any recorded personal injury accidents at the access location for a period of some 24 years.
- 9.8 It was found that the form of access and its visibility may be controlled by reasonable and deliverable planning conditions, which the applicant has confirmed would be acceptable over land either within their or the Highway Authority's control.
- 9.9 The findings of the review conclude that subject to the imposition of reasonable and deliverable planning conditions being imposed upon a planning permission, regarding the maintenance of visibility splays, which would be beneficial to all users of the access and B4069, which are achievable and may be implemented, the proposed access would be acceptable to serve the development.

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FIGURES



The Hurlstone Partnership Seven Oaks Farm, Crew Green, Shrewsbury SY5 9AS Tel: 01743 884849 Fax: 01743 884947 e-mail: office@hurlstones.com	The Banks, Bradenstoke, Wiltshire SN15 4ES Visibility Splays as Measured on Site Illustrative Layout			REV	AMENDMENTS	DATE
				SCALE 1:500 @ A3	DWG No.	Figure 1
DRAWN BY JPH			JOB No. 260302	DATE July 2026		



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The Banks, Bradenstoke, Wiltshire SN15 4ES

Potential Further Access Improvements

Illustrative Layout

DATE: July 2026

SCALE: 1:250 @ A4

DWG NO. Figure 2

Traffic Survey Results Summaries

13-49 The Banks, Lyneham Chippenham England

LAT: 51.518676 LON: -1.994426 $\pm 3m$



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15577
29-06-26, 5:38:07 AM

15577 BRADENSTOKE										
JUNE 2026					Posted Speed Limit (PSL)	Total Vehicles	5 Day Ave.	7 Day Ave.	Average 85%ile Speed	Average Mean Speed
Site	Location	Direction	Start Date	End Date						
Site No: 15577001	B4069 Bradenstoke (NW of Site Access) 51.518615, -1.994338	Channel: Northwestbound	Tue 30-Jun-26	Mon 06-Jul-26	NSL	11855	1902	1694	39.5	34.4
		Channel: Southeastbound	Tue 30-Jun-26	Mon 06-Jul-26		11585	1831	1655	37.3	32.8

15577	BRADENSTOKE				Site No: 15577001	Location	B4069, Bradenstoke (NW of Site Access)		
	Channel: Northwestbound								
TIME PERIOD	Tue 30-Jun-26	Wed 01-Jul-26	Thu 02-Jul-26	Fri 03-Jul-26	Sat 04-Jul-26	Sun 05-Jul-26	Mon 06-Jul-26	5-Day Av	7-Day Av
Week Begin: 30-Jun-26									
00:00	7	3	4	3	5	15	3	4	6
01:00	4	3	1	3	5	5	2	3	3
02:00	4	1	5	3	3	5	1	3	3
03:00	1	3	1	0	2	2	1	1	1
04:00	4	3	2	6	3	3	8	5	4
05:00	18	22	16	14	12	5	20	18	15
06:00	83	79	85	72	27	19	76	79	63
07:00	166	190	169	170	40	35	143	168	130
08:00	226	195	206	193	63	42	160	196	155
09:00	113	120	102	122	108	62	131	118	108
10:00	104	124	118	91	99	106	105	108	107
11:00	101	130	120	119	102	107	115	117	113
12:00	119	130	122	140	97	119	86	119	116
13:00	105	119	105	140	110	94	91	112	109
14:00	112	142	133	141	84	91	126	131	118
15:00	147	168	151	141	64	74	151	152	128
16:00	150	188	191	143	73	92	170	168	144
17:00	167	121	152	104	77	61	144	138	118
18:00	79	67	144	90	77	64	78	92	86
19:00	64	41	70	82	62	56	60	63	62
20:00	36	48	38	40	43	32	28	38	38
21:00	20	39	57	32	29	24	29	35	33
22:00	21	20	41	30	17	12	21	27	23
23:00	8	6	8	18	6	10	4	9	9
12H,7-19	1589	1694	1713	1594	994	947	1500	1618	1433
16H,6-22	1792	1901	1963	1820	1155	1078	1693	1834	1629
18H,6-24	1821	1927	2012	1868	1178	1100	1718	1869	1661
24H,0-24	1859	1962	2041	1897	1208	1135	1753	1902	1694

15577	BRADENSTOKE			Site No: 15577001	Location		B4069, Bradenstoke (NW of Site Access)		
	Channel: Southeastbound								
TIME PERIOD	Tue 30-Jun-26	Wed 01-Jul-26	Thu 02-Jul-26	Fri 03-Jul-26	Sat 04-Jul-26	Sun 05-Jul-26	Mon 06-Jul-26	5-Day Av	7-Day Av
Week Begin: 30-Jun-26									
00:00	7	5	3	8	12	8	4	5	7
01:00	4	2	2	4	3	8	5	3	4
02:00	4	4	6	4	7	4	2	4	4
03:00	1	2	0	2	3	5	1	1	2
04:00	5	2	1	2	1	2	9	4	3
05:00	10	15	9	9	7	3	13	11	9
06:00	62	55	52	47	15	18	49	53	43
07:00	163	160	183	127	31	29	157	158	121
08:00	124	152	160	121	56	41	154	142	115
09:00	119	110	123	90	71	55	124	113	99
10:00	99	99	84	96	101	79	85	93	92
11:00	84	117	116	104	74	103	114	107	102
12:00	106	95	109	111	114	102	109	106	107
13:00	91	116	110	125	97	91	104	109	105
14:00	105	121	133	140	105	102	101	120	115
15:00	159	165	156	170	98	104	149	160	143
16:00	168	208	187	139	84	75	170	174	147
17:00	193	151	178	150	68	86	178	170	143
18:00	123	88	134	83	71	80	103	106	97
19:00	70	80	71	74	80	74	51	69	71
20:00	42	52	47	49	48	64	53	49	51
21:00	38	44	33	37	43	36	44	39	39
22:00	19	19	27	22	14	23	16	21	20
23:00	5	14	18	14	20	17	11	12	14
12H,7-19	1534	1582	1673	1456	970	947	1548	1559	1387
16H,6-22	1746	1813	1876	1663	1156	1139	1745	1769	1591
18H,6-24	1770	1846	1921	1699	1190	1179	1772	1802	1625
24H,0-24	1801	1876	1942	1728	1223	1209	1806	1831	1655

15577	BRADENSTOKE			Site No: 15577001		Location		B4069, Bradenstoke (NW of Site Access)	
Channel: Combined									
								5-Day	7-Day
TIME PERIOD	Tue 30-Jun-26	Wed 01-Jul-26	Thu 02-Jul-26	Fri 03-Jul-26	Sat 04-Jul-26	Sun 05-Jul-26	Mon 06-Jul-26	Av	Av
Week Begin: 30-Jun-26									
00:00	14	8	7	11	17	23	7	9	13
01:00	8	5	3	7	8	13	7	6	7
02:00	8	5	11	7	10	9	3	7	7
03:00	2	5	1	2	5	7	2	2	3
04:00	9	5	3	8	4	5	17	9	7
05:00	28	37	25	23	19	8	33	29	24
06:00	145	134	137	119	42	37	125	132	106
07:00	329	350	352	297	71	64	300	326	251
08:00	350	347	366	314	119	83	314	338	270
09:00	232	230	225	212	179	117	255	231	207
10:00	203	223	202	187	200	185	190	201	199
11:00	185	247	236	223	176	210	229	224	215
12:00	225	225	231	251	211	221	195	225	223
13:00	196	235	215	265	207	185	195	221	214
14:00	217	263	266	281	189	193	227	251	233
15:00	306	333	307	311	162	178	300	312	271
16:00	318	396	378	282	157	167	340	342	291
17:00	360	272	330	254	145	147	322	308	261
18:00	202	155	278	173	148	144	181	198	183
19:00	134	121	141	156	142	130	111	132	133
20:00	78	100	85	89	91	96	81	87	89
21:00	58	83	90	69	72	60	73	74	72
22:00	40	39	68	52	31	35	37	48	43
23:00	13	20	26	32	26	27	15	21	23
12H,7-19	3123	3276	3386	3050	1964	1894	3048	3177	2820
16H,6-22	3538	3714	3839	3483	2311	2217	3438	3603	3220
18H,6-24	3591	3773	3933	3567	2368	2279	3490	3671	3286
24H,0-24	3660	3838	3983	3625	2431	2344	3559	3733	3349

15577		BRADENSTOKE		Site No: 15577001		Location		B4069, Bradenstoke (NW of Site Access)			
Tue 30-Jun-26 to Mon 06-Jul-26				Channel: Northwestbound							
TIME PERIOD	TOTAL VEHICLES	MOTOR-CYCLES	MOTOR-CYCLES %	CARS	CARS %	LGV	LGV %	HGV	HGV %	BUS	BUS %
Daily Totals											
Tue 30-Jun-26	1859	26	1.4	1594	85.8	208	11.2	30	1.6	1	0.1
Wed 01-Jul-26	1962	34	1.7	1710	87.2	186	9.5	32	1.6	0	0.0
Thu 02-Jul-26	2041	30	1.5	1765	86.5	206	10.1	38	1.9	2	0.1
Fri 03-Jul-26	1897	45	2.4	1610	84.9	206	10.9	35	1.9	1	0.1
Sat 04-Jul-26	1208	40	3.3	1078	89.2	75	6.2	15	1.2	0	0.0
Sun 05-Jul-26	1135	48	4.2	1018	89.7	53	4.7	16	1.4	0	0.0
Mon 06-Jul-26	1753	25	1.4	1492	85.1	196	11.2	39	2.2	1	0.1
Total Vehicles											
[--]	11855	248	2.3	10267	86.9	1130	9.1	205	1.7	5	0.0

15577				BRADENSTOKE		Site No: 15577001		Location		B4069, Bradenstoke (NW of Site Access)		
Tue 30-Jun-26 to Mon 06-Jul-26				Channel: Southeastbound								
TIME PERIOD	TOTAL VEHICLES	MOTOR-CYCLES	MOTOR-CYCLES %	CARS	CARS %	LGV	LGV %	HGV	HGV %	BUS	BUS %	
Daily Totals												
Tue 30-Jun-26	1801	23	1.3	1541	85.6	219	12.2	18	1.0	0	0.0	
Wed 01-Jul-26	1876	33	1.8	1626	86.7	192	10.2	24	1.3	1	0.1	
Thu 02-Jul-26	1942	34	1.8	1663	85.6	198	10.2	44	2.3	3	0.2	
Fri 03-Jul-26	1728	39	2.3	1479	85.6	190	11.0	17	1.0	3	0.2	
Sat 04-Jul-26	1223	40	3.3	1101	90.0	75	6.1	7	0.6	0	0.0	
Sun 05-Jul-26	1209	49	4.1	1093	90.4	55	4.6	11	0.9	1	0.1	
Mon 06-Jul-26	1806	29	1.6	1535	85.0	205	11.4	36	2.0	1	0.1	
Total Vehicles												
[--]	11585	247	2.3	10038	87.0	1134	9.4	157	1.3	9	0.1	

51–59 The Banks, Lyneham Chippenham England

LAT: 51.517597 LON: -1.992897 $\pm 17\text{m}$



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15577
29-06-26, 5:51:46 AM

15577		BRADENSTOKE								
JUNE 2026					Posted Speed Limit (PSL)	Total Vehicles	5 Day Ave.	7 Day Ave.	Average 85%ile Speed	Average Mean Speed
Site	Location	Direction	Start Date	End Date						
Site No: 15577002	B4069, Bradenstoke (SE of Site Access)	Channel: Northwestbound	Tue 30-Jun-26	Mon 06-Jul-26	NSL	11773	1885	1682	45.3	40.3
		Channel: Southeastbound	Tue 30-Jun-26	Mon 06-Jul-26		11602	1831	1657	44.0	38.9

15577	BRADENSTOKE			Site No: 15577002	Location		B4069, Bradenstoke (SE of Site Access)		
	Channel: Northwestbound								
TIME PERIOD	Tue 30-Jun-26	Wed 01-Jul-26	Thu 02-Jul-26	Fri 03-Jul-26	Sat 04-Jul-26	Sun 05-Jul-26	Mon 06-Jul-26	5-Day Av	7-Day Av
Week Begin: 30-Jun-26									
00:00	7	3	4	2	7	15	3	4	6
01:00	4	3	1	3	6	5	2	3	3
02:00	4	1	6	2	3	5	1	3	3
03:00	1	3	1	0	2	3	1	1	2
04:00	4	3	2	6	3	3	8	5	4
05:00	15	25	16	14	12	5	20	18	15
06:00	81	81	84	72	27	19	77	79	63
07:00	146	195	160	175	40	34	151	165	129
08:00	216	196	199	185	60	42	161	191	151
09:00	112	115	101	122	110	62	133	117	108
10:00	101	126	116	88	97	108	109	108	106
11:00	100	131	118	118	103	110	110	115	113
12:00	118	133	130	143	105	116	83	121	118
13:00	106	116	104	138	108	93	91	111	108
14:00	113	143	130	143	88	90	126	131	119
15:00	148	169	144	142	65	76	146	150	127
16:00	150	180	187	142	69	91	167	165	141
17:00	160	125	158	103	75	62	147	139	119
18:00	80	67	141	88	77	59	78	91	84
19:00	63	37	69	82	63	57	59	62	61
20:00	36	47	38	40	43	31	27	38	37
21:00	21	38	53	31	29	24	28	34	32
22:00	20	20	39	30	16	14	21	26	23
23:00	8	6	8	17	6	10	4	9	8
12H,7-19	1550	1696	1688	1587	997	943	1502	1605	1423
16H,6-22	1751	1899	1932	1812	1159	1074	1693	1817	1617
18H,6-24	1779	1925	1979	1859	1181	1098	1718	1852	1648
24H,0-24	1814	1963	2009	1886	1214	1134	1753	1885	1682

15577	BRADENSTOKE				Site No: 15577002	Location	B4069, Bradenstoke (SE of Site Access)		
	Channel: Southeastbound								
	TIME PERIOD	Tue 30-Jun-26	Wed 01-Jul-26	Thu 02-Jul-26	Fri 03-Jul-26	Sat 04-Jul-26	Sun 05-Jul-26	Mon 06-Jul-26	5-Day Av
Week Begin: 30-Jun-26									
00:00	7	5	3	8	12	8	4	5	7
01:00	4	2	2	4	3	8	5	3	4
02:00	4	4	6	5	7	4	2	4	5
03:00	1	2	0	2	3	5	1	1	2
04:00	5	2	1	2	1	2	9	4	3
05:00	10	15	9	8	7	3	13	11	9
06:00	59	55	52	50	16	19	47	53	43
07:00	172	159	187	121	31	30	153	158	122
08:00	125	148	162	123	59	42	149	141	115
09:00	118	110	124	92	69	54	123	113	99
10:00	101	99	82	96	99	84	81	92	92
11:00	86	117	120	104	75	97	119	109	103
12:00	104	93	99	110	112	103	111	103	105
13:00	91	112	108	121	100	93	101	107	104
14:00	102	125	134	138	102	103	102	120	115
15:00	159	164	160	169	99	105	150	160	144
16:00	169	208	190	138	87	78	172	175	149
17:00	200	153	175	151	70	85	175	171	144
18:00	123	85	140	84	73	82	105	107	99
19:00	70	78	73	73	76	74	51	69	71
20:00	43	54	53	50	49	64	53	51	52
21:00	39	44	36	35	43	38	45	40	40
22:00	19	19	20	21	14	23	16	19	19
23:00	5	14	18	14	20	17	11	12	14
12H,7-19	1550	1573	1681	1447	976	956	1541	1558	1389
16H,6-22	1761	1804	1895	1655	1160	1151	1737	1770	1595
18H,6-24	1785	1837	1933	1690	1194	1191	1764	1802	1628
24H,0-24	1816	1867	1954	1719	1227	1221	1798	1831	1657

15577	BRADENSTOKE			Site No: 15577002		Location		B4069, Bradenstoke (SE of Site Access)	
Channel: Combined									
								5-Day	7-Day
TIME PERIOD	Tue 30-Jun-26	Wed 01-Jul-26	Thu 02-Jul-26	Fri 03-Jul-26	Sat 04-Jul-26	Sun 05-Jul-26	Mon 06-Jul-26	Av	Av
Week Begin: 30-Jun-26									
00:00	14	8	7	10	19	23	7	9	13
01:00	8	5	3	7	9	13	7	6	7
02:00	8	5	12	7	10	9	3	7	8
03:00	2	5	1	2	5	8	2	2	4
04:00	9	5	3	8	4	5	17	9	7
05:00	25	40	25	22	19	8	33	29	24
06:00	140	136	136	122	43	38	124	132	106
07:00	318	354	347	296	71	64	304	323	251
08:00	341	344	361	308	119	84	310	332	266
09:00	230	225	225	214	179	116	256	230	207
10:00	202	225	198	184	196	192	190	200	198
11:00	186	248	238	222	178	207	229	224	216
12:00	222	226	229	253	217	219	194	224	223
13:00	197	228	212	259	208	186	192	218	212
14:00	215	268	264	281	190	193	228	251	234
15:00	307	333	304	311	164	181	296	310	271
16:00	319	388	377	280	156	169	339	340	290
17:00	360	278	333	254	145	147	322	310	263
18:00	203	152	281	172	150	141	183	198	183
19:00	133	115	142	155	139	131	110	131	132
20:00	79	101	91	90	92	95	80	89	89
21:00	60	82	89	66	72	62	73	74	72
22:00	39	39	59	51	30	37	37	45	42
23:00	13	20	26	31	26	27	15	21	22
12H,7-19	3100	3269	3369	3034	1973	1899	3043	3163	2812
16H,6-22	3512	3703	3827	3467	2319	2225	3430	3587	3212
18H,6-24	3564	3762	3912	3549	2375	2289	3482	3654	3276
24H,0-24	3630	3830	3963	3605	2441	2355	3551	3716	3339

15577				BRADENSTOKE		Site No: 15577002		Location		B4069, Bradenstoke (SE of Site Access)	
Tue 30-Jun-26 to Mon 06-Jul-26				Channel: Northwestbound							
TIME PERIOD	TOTAL VEHICLES	MOTOR-CYCLES	MOTOR-CYCLES %	CARS	CARS %	LGV	LGV %	HGV	HGV %	BUS	BUS %
Daily Totals											
Tue 30-Jun-26	1814	28	1.5	1576	86.9	182	10.0	27	1.5	1	0.1
Wed 01-Jul-26	1963	37	1.9	1727	88.0	173	8.8	26	1.3	0	0.0
Thu 02-Jul-26	2009	33	1.6	1733	86.3	197	9.8	44	2.2	2	0.1
Fri 03-Jul-26	1886	45	2.4	1592	84.4	215	11.4	34	1.8	0	0.0
Sat 04-Jul-26	1214	44	3.6	1094	90.1	67	5.5	9	0.7	0	0.0
Sun 05-Jul-26	1134	51	4.5	1015	89.5	57	5.0	11	1.0	0	0.0
Mon 06-Jul-26	1753	32	1.8	1487	84.8	203	11.6	30	1.7	1	0.1
Total Vehicles											
[--]	11773	270	2.5	10224	87.1	1094	8.9	181	1.5	4	0.0

15577 Tue 30-Jun-26 to Mon 06-Jul-26				BRADENSTOKE		Site No: 15577002		Location		B4069, Bradenstoke (SE of Site Access)	
Channel: Southeastbound											
TIME PERIOD	TOTAL VEHICLES	MOTOR-CYCLES	MOTOR-CYCLES %	CARS	CARS %	LGV	LGV %	HGV	HGV %	BUS	BUS %
Daily Totals											
Tue 30-Jun-26	1816	27	1.5	1553	85.5	213	11.7	23	1.3	0	0.0
Wed 01-Jul-26	1867	32	1.7	1617	86.6	195	10.4	22	1.2	1	0.1
Thu 02-Jul-26	1954	35	1.8	1679	85.9	201	10.3	36	1.8	3	0.2
Fri 03-Jul-26	1719	37	2.2	1471	85.6	189	11.0	19	1.1	3	0.2
Sat 04-Jul-26	1227	45	3.7	1095	89.2	75	6.1	12	1.0	0	0.0
Sun 05-Jul-26	1221	62	5.1	1096	89.8	59	4.8	4	0.3	0	0.0
Mon 06-Jul-26	1798	26	1.5	1525	84.8	210	11.7	36	2.0	1	0.1
Total Vehicles											
[--]	11602	264	2.5	10036	86.8	1142	9.4	152	1.2	8	0.1