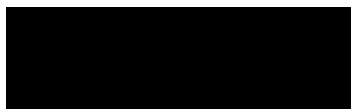




Nick Culhane
Highway Consultant

Idlewild
Fairclose Drive
Winchester
Hampshire SO22 6QW



HIGHWAY TECHNICAL NOTE

Prior Approval Part 3 Class Q – Change of Use of Agricultural Barn to Four Dwellings

The Old Rectory, Everleigh, Marlborough, SN8 3EY

Planning Application PL/2026/03351

1. Introduction

1.1 This Highway Technical Note has been prepared in support of planning application PL/2026/03351 submitted to Wiltshire Council for Prior Approval under Schedule 2, Part 3, Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended.

1.2 The application seeks the change of use of an existing agricultural barn at The Old Rectory, Everleigh to provide four residential dwellings together with associated building works, access, car parking, cycle parking and electric vehicle charging facilities.

1.3 The application site is located on the western side of Everleigh and is served by an existing vehicular access directly from the A342.

1.4 Wiltshire Council, as Local Highway Authority (LHA), has raised concerns regarding the transport and highway implications of the development, principally relating to the visibility available at the existing access onto the A342 and the frequency and nature of the vehicular movements which would be associated with the proposed residential use.

1.5 The purpose of this Technical Note is therefore to consider those concerns and, in particular, to assess the likely traffic implications of the proposed four dwellings having proper regard to the lawful and realistically available fallback position associated with the site.

1.6 Of particular relevance is the ability to use agricultural buildings within the established agricultural unit for flexible commercial purposes under Class R of Part 3 of the GPDO. A Class R notification has already been made within the agricultural unit for 144sqm of flexible commercial floorspace under reference PL/2026/01680.

1.7 In considering the relevance of this fallback position, the LHA has stated that it does not consider significant weight can be attached to the Class R office fallback on the basis that no evidence has been provided to demonstrate that such a use is likely to come forward or that it would operate at the level suggested within the submitted traffic assessment.

1.8 This Technical Note specifically addresses that position as the relevant test when considering a fallback is not whether its implementation is probable or likely, but whether there is a real, as opposed to merely theoretical, prospect of it occurring. This distinction is particularly important in the present case, given that Class R provides a permitted development route which does not require a conventional planning permission and that a Class R notification has already been submitted within the same established agricultural unit.

1.9 The significance of such a fallback has recently been considered by Wiltshire Council in determining another Class Q application at Plymouth, Stock Lane, Landford under application reference PL/2024/10157. In that case the Council accepted that an authorised 150sqm Class E office fallback represented a material highway consideration and ultimately granted Prior Approval notwithstanding an objection originally raised by the LHA.

1.10 There are clear parallels between the two cases and the Plymouth decision therefore provides an important and directly relevant example of the approach previously adopted by Wiltshire Council when considering both the evidential threshold applicable to a fallback position and the highway implications of a Class Q development against an available Class R alternative.

2. Site Location and Highway Context

2.1 The application site comprises an existing agricultural barn situated adjacent to The Old Rectory and St Peter's Church on the western side of Everleigh.

2.2 The site forms part of an established group of buildings and is accessed by way of an existing vehicular access directly from the A342.

2.3 The A342 provides the principal highway connection through this part of Wiltshire. In the vicinity of the application site it is subject to a 50mph speed limit.

2.4 The existing access is already established and serves the existing uses within the site. No new junction with the public highway is required as a consequence of the proposed Class Q development.

2.5 The LHA has identified visibility at the junction as its principal highway concern. It has referred to a visibility requirement of 160m and considers that the visibility presently available is below this distance.

2.6 Importantly, however, the existing access is not dependent upon the Class Q proposal for its lawful use. It already serves the established site and would continue to be capable of serving lawful agricultural and other permitted uses in the absence of the proposed residential conversion.

2.7 The relevant highway question is therefore not whether an entirely new access should be introduced onto the A342 or if the existing access should be improved, but whether the change in the nature and quantity of traffic associated with four dwellings, when compared with the lawful and realistically available alternatives, would result in an unacceptable transport or highway impact.

3. Proposed Development

3.1 This application seeks the conversion of the existing agricultural barn to four residential units, and each proposed dwelling would have a floor area of approximately 67sqm.

3.2 The submitted development proposals include associated residential amenity space, car parking, communal cycle storage and electric vehicle charging facilities.

3.3 The dwellings would continue to utilise the established vehicular access onto the A342.

3.4 The LHA initially also expressed concern regarding the ability of vehicles to turn within the site. It has subsequently acknowledged that the applicant controls the land necessary to provide adequate turning and that this issue can be addressed through the submission of an appropriate revised plan.

3.5 The substantive remaining highway matter therefore concerns the use of the existing access and, particularly, whether the frequency of traffic associated with four dwellings would materially increase highway risk.

4. Existing and Lawful Highway Position

4.1 The application building has historically been used for agricultural purposes including hay storage, sheltering sheep and the storage of agricultural machinery and equipment.

4.2 That use is capable of generating vehicular movements including tractors and trailers, agricultural machinery, deliveries and collections. These movements may be less regular than residential movements but can involve considerably larger, slower and less manoeuvrable vehicles.

4.3 It is accepted that agricultural traffic can be seasonal and that it would not necessarily exhibit the same daily profile as residential traffic and for this reason, the agricultural use is not relied upon as the sole comparator within this Technical Note.

4.4 More significant is the permitted development fallback available under Class R.

4.5 Class R provides a mechanism whereby qualifying agricultural buildings can change to flexible commercial uses, subject to the applicable limitations and procedures within the GPDO.

4.6 A separate Class R notification has already been submitted in respect of another barn forming part of the same established agricultural unit for 144sqm of flexible commercial use under application reference PL/2026/01680.

4.7 The significance of the Class R position is that the established agricultural unit has a genuine and available alternative development scenario capable of generating regular vehicular movements through the existing access.

4.8 It is therefore inappropriate to assess the Class Q development solely against an assumed baseline of negligible agricultural traffic. The appropriate highway assessment must have regard to the lawful uses and realistically available development options for the site.

5. Traffic Generation

Proposed Residential Use

5.1 The likely traffic generation associated with residential development was previously considered as part of the Plymouth Class Q development using TRICS data. In that case, the LHA accepted the resulting prediction of approximately 25 daily vehicle movements for five dwellings. For consistency, the same TRICS trip rates have therefore been applied to the four dwellings now proposed at The Old Rectory and these are shown in the table below.

Residential – Privately Owned Houses									
Mode	AM Peak (0800 – 0900)			PM Peak (1700 – 1800)			Daily		
	Arrival	Depart	2-Way	Arrival	Depart	2-Way	Arrival	Depart	2-Way
Vehicles	0.240	0.405	0.645	0.298	0.157	0.455	2.498	2.613	5.11

Using the above agreed trip rates, the table below provides an indication of what these current 4 dwellings could generate.

4 Dwellings at the Old Rectory									
Mode	AM Peak (0800 – 0900)			PM Peak (1700 – 1800)			Daily		
	Arrival	Depart	2-Way	Arrival	Depart	2-Way	Arrival	Depart	2-Way
Vehicles	0.96 (1)	1.62 (2)	3	1.19 (1)	0.63 (1)	2	9.99 (10)	10.5 (11)	21

5.2 On this basis, four dwellings would be expected to generate approximately:

Period	Two-Way Vehicle Movements
AM Peak Hour	3
PM Peak Hour	2
12-Hour Day	21

5.3 This represents a modest level of vehicular activity.

5.4 An average of 21 two-way movements across a 12-hour period equates to approximately 1.75 movements per hour, although in practice these movements would not be distributed evenly throughout the day.

Class R / Class E Office Comparator

5.5 The potential traffic generation associated with a 150sqm Class E office was also previously examined as part of the Plymouth application using the TRICS database.

5.6 Allowing for circulation, toilets, ancillary accommodation and other non-workstation floorspace, a gross floor area of 150sqm was assumed to provide approximately 112.5sqm of usable office accommodation, capable of accommodating approximately 11 employees. The table below therefore reproduces the traffic generation assessment previously considered by Wiltshire Council for the 150sqm Class E office comparator at Plymouth.

Likely Vehicular Traffic Generation Based on 112.5sqm Class E Office			
	AM Peak (0800 – 0900)	PM Peak (1600 – 1700)	Daily (12 Hour)
Arrivals	7	1	23
Departures	0	6	23
Total	7	7	46

5.7 Application of the TRICS office trip rates resulted in the following predicted traffic generation:

Period	Arrivals	Departures	Total
AM Peak Hour	7	0	7
PM Peak Hour	1	6	7
12-Hour Day	23	23	46

5.8 A 150sqm Class E office could therefore generate approximately 46 two-way vehicle movements during a typical 12-hour weekday, including seven movements during each of the AM and PM peak hours.

Comparison

5.9 The resulting comparison is:

Land Use	AM Peak	PM Peak	12-Hour Daily
150sqm Class E Office	7	7	46
Four Dwellings	3	2	21
Difference	-4	-5	-25

5.10 The proposed residential development would therefore have the potential to generate substantially fewer vehicle movements than a 150sqm Class E office use.

5.11 More importantly in the context of the LHA's current concern, the office use would itself generate regular weekday movements concentrated around conventional commuting periods.

5.12 The distinction drawn by the LHA between intermittent agricultural traffic and regular residential traffic therefore does not address the Class R comparator. An office employing approximately 11 people would inherently generate regular arrivals and departures and those movements would be particularly concentrated during weekday AM and PM peak periods.

5.13 On the TRICS evidence, the proposed four dwellings would generate approximately between 4 and 5 fewer movements during both the AM and PM peak hours than the office comparator.

5.14 Accordingly, even if the LHA considers the timing and regularity of traffic to be more important than simply the overall daily quantum, the Class R/Class E comparator remains directly relevant.

6. The Plymouth Class Q Decision

6.1 Of particular relevance to the present application is Wiltshire Council's determination of application PL/2024/10157 at Plymouth, Stock Lane, Landford as that application sought Prior Approval for the conversion of former agricultural buildings to five dwellings.

6.2 The circumstances are particularly relevant because the LHA initially objected to the development on highway grounds. Stock Lane was described as a narrow rural road with restricted alignment, limited forward visibility and limited opportunities for vehicles to pass.

6.3 The earlier Class Q proposal at Plymouth had also been refused on highway grounds, with concern expressed that the residential development would generate additional traffic on a highway considered unsuitable to accommodate that increase.

6.4 Subsequently, however, a Class R notification was made under reference PL/2024/07911 for the conversion of 150sqm of an agricultural building to a Class E office use and Wiltshire Council confirmed that proposal as permitted development.

6.5 A detailed Transport Statement was then prepared comparing the traffic generation associated with the authorised office use with the five proposed dwellings.

6.6 The assessment identified the following:

Land Use	AM Peak	PM Peak	Daily
Class E Office	7	7	46
Five Dwellings	3	2	25

6.7 The Plymouth Class Q development was therefore predicted to generate 21 fewer daily vehicle movements than the Class E fallback.

6.8 Wiltshire Council expressly considered this evidence in its Delegated Officer Report. The Council acknowledged that the nationally accepted TRICS evidence demonstrated that the authorised office use would generate more daily traffic than the proposed residential development.

6.9 Of particular importance, the Council also expressly considered whether the Class R use represented a legitimate fallback position.

6.10 The Officer Report referred to the established principle arising from Samuel Smith Old Brewery that a "real" prospect is the antithesis of one which is merely theoretical and that, for a prospect to be real, it does not have to be probable or likely; a possibility is sufficient.

6.11 The Officer Report went on to recognise that there is no requirement in every case for there to be a firm design for the alternative development or for a landowner or developer to have stated precisely how permitted development rights would be exercised.

6.12 Wiltshire Council distinguished that position from the earlier Nursery Farm case, where the fallback relied upon the recommencement of a former agricultural operation and there was considered to be very little realistic prospect of that occurring.

6.13 Crucially, the Council concluded in relation to Plymouth that, because the likely traffic generation of the proposed residential development would be below the authorised fallback position, the transport and highways element of the Class Q prior approval assessment was satisfied.

6.14 Prior Approval was subsequently granted.

7. Relevance to The Old Rectory

7.1 The similarities between Plymouth and the present application are significant as both sites are within Wiltshire and both involve the conversion of agricultural buildings to residential accommodation pursuant to Class Q.

7.2 Both involve rural locations where the LHA has expressed concern about the suitability of the existing highway arrangements to accommodate residential traffic.

7.3 Most importantly, both involve a Class R commercial fallback capable of generating materially greater levels of vehicular traffic than the proposed residential development.

7.4 At Plymouth, the existence of the Class R office fallback fundamentally changed the assessment of the highway implications of the Class Q proposal.

7.5 The current suggestion that little weight can be attached to the Class R fallback because no evidence has been provided that the commercial use is “likely to come forward” is difficult to reconcile with the approach expressly adopted by Wiltshire Council at Plymouth. In that case, the Council specifically recognised that the applicable test is not whether implementation of the fallback is likely or probable, but whether there is a real rather than merely theoretical prospect of it occurring, and expressly accepted that a possibility would be sufficient to establish such a real prospect.

7.6 Moreover, the circumstances at The Old Rectory go beyond a wholly hypothetical suggestion that Class R rights might conceivably be exercised at some future date. A Class R notification has already been made within the established agricultural unit under reference PL/2026/01680 for 144sqm of flexible commercial floorspace.

7.7 There is therefore demonstrable evidence of an intention to utilise Class R permitted development rights within the agricultural unit.

7.8 The fallback position should consequently be afforded material weight when assessing the transport and highway implications of application PL/2026/03351.

8. Access and Visibility

8.1 It is acknowledged that the LHA considers the visibility available from the existing access onto the A342 to be below that normally sought for a road subject to a 50mph speed limit.

8.2 The Highway Officer has referred to a visibility distance of 160m and has observed that the available visibility is considerably below this figure.

8.3 The significance of that observation must nevertheless be considered within the proper context of the existing and fallback use of the access.

8.4 The visibility characteristics of the access do not change depending upon whether the barn is occupied for agricultural, commercial or residential purposes.

8.5 If the Class R fallback were implemented, employees, visitors, deliveries and servicing vehicles would use precisely the same access and would be exposed to precisely the same visibility conditions.

8.6 On the TRICS assessment, however, the office comparator could generate approximately seven vehicle movements during each highway peak period compared with approximately three movements in the AM peak and two movements in the PM peak associated with the four proposed dwellings.

8.7 The proposed residential development therefore does not create the visibility constraint. Rather, it changes the use of an existing access which is already capable of serving lawful development and an available permitted development fallback.

8.8 This distinction is important as the relevant consideration is the transport and highway impact of the proposed development, rather than whether the existing access would satisfy contemporary design standards if it were being constructed as an entirely new junction.

8.9 Where an alternative lawful use capable of generating materially greater traffic can utilise the same access without further highway approval, the existence of a shortfall against a contemporary visibility standard does not, in itself, demonstrate that the proposed lower-generating use would result in an unacceptable transport or highway impact.

8.10 The LHA has also confirmed that it has not undertaken an investigation of the collision history associated with the access. Consequently, no evidence has presently been identified demonstrating an existing collision pattern associated with the operation of the junction.

8.11 It is accepted that an absence of recorded injury collisions would not, in isolation, establish that an access is safe. Equally, however, highway safety conclusions should be evidence-led and proportionate to the actual change in traffic arising from the development.

9. Traffic Character

9.1 The LHA has suggested that the issue is not simply the quantum of traffic but the character and timing of the movements generated. That distinction has some relevance when comparing residential development solely against an agricultural use, since agricultural activity may be intermittent and seasonal. It does not, however, overcome the Class R comparison.

9.2 Office activity is characteristically regular and weekday based. Employees would generally arrive during the morning peak period and leave during the afternoon or evening peak period, while visitors, deliveries and servicing movements could occur throughout the working day.

9.3 The TRICS assessment reflects precisely this characteristic, predicting seven vehicle movements during each of the AM and PM peak periods.

9.4 The four residential dwellings are predicted to generate only approximately two to three movements during the corresponding peak periods.

9.5 Consequently, whether the comparison is undertaken on the basis of total daily traffic, peak-hour traffic or the regularity of vehicular activity, the proposed residential use would not represent the highest-generating realistic use of the access.

9.6 The proposition that the residential development must be resisted because it would introduce regular movements at peak periods is therefore difficult to sustain when a realistic permitted development alternative exists which could generate a greater concentration of movements during precisely those periods.

10. Summary and Conclusions

10.1 This Highway Technical Note has considered the transport and highway implications of the proposed conversion of the existing agricultural barn at The Old Rectory, Everleigh to four dwellings under Class Q.

10.2 The development would continue to utilise the established vehicular access onto the A342.

10.3 The LHA's remaining concern principally relates to the visibility available at that access and the anticipated regularity of residential vehicular movements.

10.4 The proposed four dwellings are predicted to generate approximately 21 two-way vehicle movements during a typical 12-hour day, including approximately two to three movements during each of the AM and PM peak periods.

10.5 By comparison, the TRICS assessment undertaken for a 150sqm Class E office identifies approximately 46 daily vehicle movements, including seven movements during each of the AM and PM peak periods. The proposed residential development therefore represents a materially lower traffic-generating use.

10.6 Wiltshire Council has recently considered essentially the same issue in determining the Class Q development at Plymouth, Stock Lane, Landford under application PL/2024/10157. In that case, an objection had been raised by the LHA concerning the suitability of the surrounding highway network for the traffic generated by five dwellings.

10.7 A 150sqm Class R/Class E office fallback was identified and TRICS evidence demonstrated that this could generate 46 daily movements compared with 25 movements from the five proposed dwellings.

10.8 Wiltshire Council expressly accepted the relevance of that fallback and in doing so it recognised that a real prospect does not need to be probable or likely and that a possibility can be sufficient.

10.9 The Council subsequently concluded that because the residential development would generate less traffic than the authorised fallback, the transport and highways element of the Class Q prior approval assessment was satisfied and Prior Approval was granted.

10.10 The circumstances at The Old Rectory are closely analogous. Indeed, a Class R notification for 144sqm of flexible commercial floorspace has already been made within the established agricultural unit under reference PL/2026/01680.

10.11 The proposed four dwellings would generate substantially less traffic than the Class R/Class E comparator, both across the day and during the critical AM and PM highway peak periods.

10.12 The suggestion that the Class R fallback should be afforded little weight simply because implementation has not been demonstrated to be likely is therefore difficult to reconcile with the approach previously adopted by Wiltshire Council when considering the materially similar Plymouth Class Q application.

10.13 The existing access and its visibility characteristics would remain unchanged whichever lawful use occurs. The Class Q proposal would not create the existing visibility constraint and would result in a lower level of traffic using the access than could arise from the realistic Class R fallback.

10.14 Having regard to the modest traffic generation associated with four dwellings, the available Class R fallback, the substantially greater traffic capable of being generated by that fallback and Wiltshire Council's recent and directly relevant consideration of the same issue at Plymouth, it is

concluded that the proposed development would not result in an unacceptable transport or highway impact.

10.15 On this basis, there is no substantive transport or highway reason why Prior Approval should be withheld under the transport and highways provisions of Class Q.