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Planning Application PL/2026/03351
Response to Local Highway Authority Consultation dated 29 September 2026
Prior Approval Part 3 Class Q – Change of Use of Agricultural Barn to Four Dwellings
The Old Rectory, Everleigh, Marlborough, SN8 3EY

1. Introduction

1.1 The Local Highway Authority's further consultation response dated 29 September 2026 has been carefully considered. The response acknowledges the traffic comparison undertaken between the proposed Class Q development and the Class R / Class E fallback but raises a further concern regarding the potential continuation of agricultural activity within the remainder of the holding.

1.2 Specifically, the LHA states that insufficient information has been provided concerning the future operation of the wider agricultural unit and that it has therefore not been demonstrated whether traffic associated with the proposed dwellings would replace existing agricultural movements or occur in addition to traffic generated by the retained agricultural uses.

1.3 This concern appears to conflate two separate components of the traffic baseline. The continued operation of the retained agricultural holding does not alter the comparative traffic effect arising specifically from the change of use of the application building.

1.4 For clarity, the applicant is not suggesting that all agricultural activity across the wider holding would necessarily cease as a consequence of the Class Q development. Agricultural activity associated with the retained land and buildings may continue.

1.5 However, any such retained agricultural traffic is common to both the fallback and proposed development scenarios. It is therefore not necessary to establish a precise numerical trip generation for the remainder of the agricultural holding in order to identify the incremental traffic effect arising from the application.

2. Correct Comparative Baseline

2.1 The appropriate comparison can be expressed straightforwardly as follows:

Scenario	Traffic Using the Access
Lawful / fallback position	Retained agricultural traffic + traffic associated with the lawful / fallback use of the application building
Proposed Class Q position	Retained agricultural traffic + traffic associated with four dwellings

2.2 The retained agricultural traffic is present on both sides of the comparison. Accordingly, whatever the absolute level of traffic generated by the remainder of the agricultural holding, the material question is the difference between the traffic capable of being generated by the application building under the fallback position and that generated by the four proposed dwellings.

2.3 The submitted Highway Technical Note demonstrates, using the same traffic assumptions previously considered by Wiltshire Council at Plymouth, that a Class E office comparator could generate approximately 46 two-way movements during a typical 12-hour weekday, including seven movements during each highway peak period. The proposed four dwellings are predicted to generate approximately 21 daily movements, including three movements during the AM peak and two during the PM peak.

2.4 Consequently, if retained agricultural traffic is represented by 'X', the respective traffic scenarios are:

Fallback position = X + 46 daily movements
Proposed development = X + 21 daily movements
Net difference = 25 fewer daily movements

2.5 The difference remains 25 daily vehicle movements irrespective of the value attributed to X.

2.6 The same principle applies during the highway peak periods. The retained agricultural component is common to both scenarios, whereas the Class R / Class E comparator has the potential to generate seven movements in each peak compared with three AM and two PM movements associated with the proposed dwellings.

2.7 It follows that quantifying the entirety of the retained agricultural operation would not alter the comparative assessment. Such an exercise would simply add the same baseline traffic component to both scenarios.

3. Existing Agricultural Use of the Application Building

3.1 There is also an additional point which should not be overlooked. The application building itself presently forms part of the lawful agricultural use and has historically been used for hay storage, sheltering sheep and storing agricultural machinery and equipment. These activities are capable of generating tractors, trailers, agricultural machinery, deliveries and collection movements.

3.2 Conversion of that building to residential use would remove its availability for those agricultural activities. The assessment above is therefore inherently conservative because it does not deduct any agricultural movements presently capable of being associated specifically with the application building.

3.3 In other words, the submitted comparison does not depend upon an assumption that agricultural activity elsewhere on the holding would cease. It simply compares the traffic consequences of alternative lawful uses of the application building whilst treating the remainder of the agricultural operation as a constant.

4. Relevance of the Class R Fallback

4.1 The LHA's response also continues to describe the Class R position as a potential scenario. It remains relevant that a Class R notification has already been made within this agricultural unit for 144sqm of flexible commercial floorspace under reference PL/2026/01680.

4.2 The fallback case therefore does not depend upon an assertion that the wider agricultural holding would cease operating. Class R operates in the context of an established agricultural unit and provides a lawful mechanism through which qualifying agricultural floorspace may be converted to flexible commercial use.

4.3 The Plymouth decision remains relevant in demonstrating Wiltshire Council's previous approach to the principle of a Class R fallback in the context of a Class Q highway assessment. It is accepted that every application must be considered on its individual circumstances; however, that does not diminish the relevance of the Council's consideration of the fallback principle.

4.4 In the Plymouth case, Wiltshire Council recognised that a real prospect need not be probable or likely and that a possibility can be sufficient. The present circumstances also include a Class R notification within the same established agricultural unit, providing tangible evidence that the exercise of Class R rights is not merely theoretical.

5. Highway Implications

5.1 The visibility available at the access is acknowledged and has not been disputed. The relevant question is whether the Class Q development would materially increase the use of that access compared with the lawful and realistic alternative position.

5.2 Retained agricultural traffic does not change that comparison. Such traffic would use the access irrespective of whether the application building is converted to four dwellings or remains available for agricultural/Class R purposes.

5.3 Indeed, the LHA's concern that residential traffic could occur 'in addition' to retained agricultural traffic applies equally to the fallback position: Class R traffic could similarly occur in addition to traffic generated by the retained agricultural holding. The appropriate comparison must therefore be undertaken on an equivalent basis.

5.4 On that equivalent basis, the proposed four dwellings are predicted to generate materially fewer movements than the Class R / Class E comparator, both throughout the day and during the highway peak periods.

5.5 The absence of a numerical assessment of traffic generated by the retained agricultural holding therefore does not prevent the incremental highway effect of the proposed development from being established. Whatever reasonable value is attributed to retained agricultural traffic, that component is common to both scenarios and does not alter the difference between them.

5.6 Furthermore, the comparison is conservative because no allowance has been made for the removal of agricultural traffic presently capable of being generated by the application building itself.

6. Summary and Conclusion

6.1 The further information requested by the LHA concerning the absolute traffic generation of the remainder of the agricultural holding would not alter the comparative highway assessment.

6.2 The retained agricultural operation is a common component of both the lawful/fallback and proposed scenarios. The incremental effect of the application can therefore be established by comparing the traffic associated with the lawful/fallback use of the application building with the traffic associated with the four proposed dwellings.

6.3 On the submitted assessment, the Class R/Class E comparator could generate approximately 46 daily vehicle movements compared with approximately 21 movements from the proposed four dwellings, representing a reduction of approximately 25 daily movements. The residential proposal would also generate fewer movements during the AM and PM highway peak periods.

6.4 This comparison remains unchanged whatever reasonable level of traffic is attributed to the retained agricultural holding because that traffic is present on both sides of the assessment.

6.5 The assessment is additionally conservative because it makes no deduction for agricultural traffic capable of being generated by the application building in its existing lawful use.

6.6 Accordingly, the proposed Class Q development would replace the lawful use potential of the application building with a use predicted to generate a modest level of vehicular activity and materially less traffic than the identified Class R/Class E fallback. The proposals therefore remain consistent with the transport and highway considerations relevant to the Class Q assessment.

