PLANNING APPLICATION 26/01201/MFUL BY WAIN HOMES SOUTH WEST
HOUSING DEVELOPMENT, LYNCH ROAD, THORVERTON, DEVON
TRANSPORT ASSESSMENT BY AWP
COMMENTS TO THORVERTON PARISH COUNCIL
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INTRODUCTION AND SUMMARY

This report responds to the Transport Assessment (TA) submitted with the application for the construction of 66 new dwellings to the West of the village of Thorverton. The TA characterises the development as a good location for housing in terms of sustainable transport, and should have provided forecasts of changes in traffic flows due to trips generated from the new housing. It has failed to do the latter, other than in the lanes adjacent to the site, due to delays in baseline surveys of existing traffic, without which it is impossible to assess future traffic conditions. Forecast traffic flows and potential congestion or safety issues are usually a core element of a TA, but in this case there is very little on which to comment.

Sustainable personal transport is a complex and multi-faceted subject, but in principle it is about giving people real choice in how they travel around for different types of journey, and meeting sustainability goals by promoting travel modes that have lower energy demands and carbon emissions. There is also a range of other benefits including reductions in air and noise pollution and accidents, whilst at the same time improving health and community interaction, and lessening social isolation.

In practice, this comes down to minimising both the use of and the reliance on the private car, by creating the circumstances in which it is both possible, attractive, and safe to walk, wheel, cycle, and use public transport to access as many travel needs as possible. This in turn needs relatively short distances and safe and pleasant places for walking, wheeling[1], and cycling, and public transport good enough to act as a realistic alternative to the car for at least some journeys. It does not mean that all people should stop using cars for all journeys, but it is about enabling people to use modes other than the car when it makes sense, and lessening dependence on the car as the default mode for all travel.

The TA falls well short of demonstrating that the housing at Thorverton meets sustainable transport criteria. In essence, it says little more than that residents could walk, cycle, or use public transport for trips from their houses (it does not mention wheeling), and very little about whether or why they would. This report looks at the case presented in the TA, and its shortcomings, under the following headings:

- NPPF policies and sustainable transport
- Sustainability in a national context: the Department for Transport's (DfT) 'Connectivity Tool'
- Thorverton as a walkable neighbourhood, with reference especially to the misuse of the 'Manual for Streets' volumes, and the limited level of services in the village
- Distance thresholds for walking and cycling
- Adequacy of bus services to attract car-available people
- Travel Plan
- Road safety
- Residential parking standards
- Trip generation
- Traffic surveys Lynch Road

[1] Wheeling is now commonly used to denote travel by wheelchairs, mobility scooters, motorised tricycles and similar, to meet disabled transport needs

- Devon County Council response to application

NPPF 4 and sustainable transport

NPPF 4 was issued in August 2026, and is generally regarded as having strengthened the presumption in favour of approving applications for new housing development, but this is not an open invitation to approve housing applications. There is an overarching economic objective to ensure that *"sufficient land of the right types is available in the **right places** and at the right time"* (NPPF4 para 17a pdf p4, my emphasis). The Thorverton scheme is demonstrably in the wrong place to meet the sustainable transport vision of NPPF4.

It is understood that the Thorverton scheme falls under policy S5 of the 'presumption hierarchy' of NPPF4, as development outside settlements. This is more restrictive than S4, saying that *"Only certain forms of development should be approved outside settlements"* (NPPF4 pdf p25). Housing is one of the 'certain forms' (S5 1h), but is hedged with further restrictions. For Thorverton these narrow down the window for possible approval to

"1hiii. Be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure"

Very little transport infrastructure is proposed outside the housing itself, apart from a short section of footway along Lynch Road, so this condition is dependent on existing infrastructure away from the scheme. As will be argued below, the infrastructure for walking, wheeling, and cycling from the housing is inadequate and unsafe, adding to the degree of car reliance for trips by residents and visitors, and thereby the unsustainability of the scheme in transport terms.

NPPF section 15 makes clear that 'promoting sustainable transport' is a core objective. All of policy TR3 – locating development in sustainable locations – is relevant to Thorverton, and is quoted in full in the TA. TR3 1a and 1e are especially pertinent:

*"Development proposals which could generate a significant amount of movement, **in the context of the area within which they would be situated**, should be in locations that are sustainable … This means the location should limit the need to travel, particularly by private car, and offer a genuine choice of transport modes for residents and users …"* (my emphasis)

"In rural areas, opportunities to improve walking, wheeling, cycling and public transport and enhance the connectivity of an area should be taken where they exist and can be supported by the development proposed."

TR3 actively endorses the use of the DfT Connectivity Tool in assessing the connectivity of proposed developments.

In summary, NPPF4 stops well short of a presumption in favour of the Thorverton application.

Sustainable transport and Connectivity

The Dft Connectivity Tool was published in June 2025

"to help built environment professionals to understand how sustainably located a place is and the transport interventions needed to support it" (https://www.gov.uk/guidance/connectivity-tool opening statement)

Prior to this, there was a general understanding that urban areas are better placed than rural areas to offer alternatives to the car, but the tool codifies this using GIS to give a 'score' of between 0 (low) and 100 (high) for connectivity for 100mx100m squares across England and Wales, both including and excluding car use. It is emphasised that the tool should not be used on its own as a bald statement of connectivity, since context and local evidence could modify the headline score. A lowish score in a rural village may be quite high compared with other villages in similar locations, while a highish score may be poor in an urban context. The Connectivity Tool addresses this through a matrix comparing scores across six settlement types – major conurbation, minor conurbation, urban city/town, rural town and fringe, rural village, remote hamlets/ isolated dwellings - enabling comparison between similar types. However, even the headline score itself is an indicator of the extent to which a location meets sustainable transport criteria.

The score for non-car transport for the squares covering the proposed housing scheme at Thorverton is 18 (most of the village lies between 18 and 20). The location is in the 10th percentile at a national level (in other words, at least 90% of all squares have a higher score). Large areas of rural England are in the bottom 10% for connectivity[2], reinforcing the point that rural locations are generally far less sustainable in transport terms. Looking at the Connectivity Matrix, the site is in the 20th percentile for rural villages, so at least 80% of rural village locations in England and Wales have a higher connectivity score than the housing location (a score of 19 to 20 is roughly at the 20% mark).

The Connectivity Tool score provides an average of the various factors that could make a village better or worse in sustainable transport terms, such as services within the village, distance from other services and destinations, quality of public transport services. As a comparison, I checked the score for the village in which I grew up, in North Lancashire (Hornby), slightly larger than Thorverton but a similar distance from an urban centre (Lancaster, which is similar in its functions to Exeter). Its score is in the range 32-35, probably because it has a wider range of village facilities including shops, and a much better bus service.

The TA makes no reference to the Connectivity Tool. Although the Connectivity Tool should not be used as the sole arbiter of a location's sustainable transport credentials, the very low connectivity score of the Thorverton housing site sets a very high bar for contextual considerations and local evidence to surmount. Its omission from the TA is therefore a significant defect.

The walkable neighbourhood

TA 4.23 makes the bold claim that *"The site is … considered to be in a 'walkable neighbourhood', as defined within the Manual for Streets* (MfS)*"*. MfS1 has a broad statement on what constitutes a 'walkable neighbourhood'

"Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot … MfS encourages a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance of most residents. " (MfS1 4.4.1)

There are some significant words here - *'range of facilities', 'comfortably, 'creation', 'interconnected street patterns' and 'daily needs'* - which raise questions over the Thorverton housing scheme and MfS criteria.

An immediate problem with the TA's use of MfS is that the two volumes are primarily ***design guides*** rather than assessment tools: they are about ***creation*** of public realm interventions to shift the balance away from the car and towards people using other transport modes. An approach under MfS would be about finding

[2] Overall scores of up to 39 are in the lowest 10%, while the highest overall scores for rural villages and remote areas are 38 up to around 45

ways of integrating new development into existing fabric and where possible improving existing infrastructure, not about depositing self-contained developments next to existing settlements and calling the whole a walkable neighbourhood.

A location that does not have a food shop within walking distance can scarcely be described as providing for daily needs. The absence of any type of shop calls into question whether there is a 'range' of facilities. There is also a whole range of non-retail functions such as cafes, libraries, entertainment venues, and facilities for sports and pastimes, that might be expected in a walkable neighbourhood, including employment locations. These are more likely to happen in urban areas, and MfS concentrates largely on urban areas. Thorverton has some facilities, but not enough to qualify as a 'walkable neighbourhood'

The TA misuses the 'Shared Space' principle as used in MfS, applying it to existing country lanes and village streets when it is a precise urban design concept. MfS2 explains that:

2.9.1 *Shared Space is predominantly* ***an approach to highway design*** *and is introduced for a range of purposes including: • improving the built environment; • giving people freedom of movement rather than instruction and control; • improving the ambience of places; • enhancing social capital; • enhancing the economic vitality of places; and • safety.* (my emphasis)

MfS 4.9.3, as quoted in TA 3.29, outlines design measures that can be introduced to alter the balance between motor vehicles and other road users. The Thorverton housing scheme does not provide any measures to achieve the purposes in MfS2 2.9.1: and its justification of shared space in village centres relies on a reference to MfS2 5.2.2 which says no more than that *"streets without conventional footways* ***may*** *be appropriate"*. It all comes down to the actual configuration of street space in Thorverton – actual traffic and pedestrian volumes, sightlines at junctions, safety and the perception of safety, quality of surfaces - and the TA has done little if anything to examine this.

Worst of all is the assumption that the lanes outside the village and adjacent to the development are fine for pedestrian use because such lanes are generally recognised as shared space. Such lanes usually have only one surface for all users, but how much they are used other than by motor vehicles depends on whether they are, and are perceived as, safe and comfortable for other road users. This comes down to factors such as width, verges, forward visibility, and degree of enclosure. It is less dependent on vehicle numbers – a car every three minutes can feel as dangerous as a car every minute – though vehicle speeds and size can play a role.

Active Travel England published a Rural Design Guide (RDG) in July 2026, which like MfS is primarily about design advice for upgrading walking, wheeling, and cycling opportunities in rural areas. In section 4.5 it has clear advice on traffic volume and speed thresholds below which shared use of country lanes might be considered, though always subject to actual conditions at any given location. The RDG states that:

- The Traffic Advisory Leaflet 3/04 suggests that *"Where pedestrians and cyclists share carriageways with motor vehicles, traffic volumes should be no more than 1,000 vehicles per day (vpd) or 100 vehicles per hour (vph)"*: and that *"Actual traffic speeds should be no more than around 20mph"*
- However, the RDG points out that 100vph is close on two vehicles per minute, which will be uncomfortable for other road users in most situations, and concludes that *"[100vph] should be regarded as an upper limit for walking, wheeling and cycling routes, and designers should aim for a much lower frequency of interaction of … around 10 vehicles per hour."*

Traffic volumes on the two lanes adjacent to the housing scheme, even in the unreliable TA survey in January, are between 23 and 38vph at peak hours (TA Tables 3.1 to 3.3), and are forecast to double on Lynch Road with the housing in place (TA Table 6.3), assumes single general access to housing as proposed). This clearly exceeds the desirable traffic volumes for shared use proposed by the RDG report.

On speeds, TA Tables 3.1 to 3.3 indicate mean two-way peak hour speeds of 20-21mph, and 85th percentile speeds between 24.9-27.2mph. The TA characterises these as low speeds, but according to the RDG ***actual*** speeds should be no more than around 20mph whereas according to the TA around half the traffic is travelling at speeds above 20mph. More detail is to be found in TA Appendix C, where graphs for each of the three survey sites (TA pdf pages 113, 171, and 229: first and third are the two Lynch Road survey points) show respectively that:

- 58%, 65%, and 52% of vehicles are travelling at 20-25mph
- 41%, 21%, and 14% of vehicles are travelling at 25-30mph

These figures clearly breach the RDG guidelines on speed for shared space rural lanes. Furthermore, low numbers of vehicles travelling at over 30mph were recorded , and although they are exceptions they can significantly affect perceptions of safety and comfort for other road users.

Lynch Road and the unnamed lane along the South side of the housing site are totally unsuitable walking routes between the housing and the village. Lynch Road would have a short section of new footway from the housing access junction, a short section of verge, then becomes a narrow lane with high hedges/ banks on both sides, and no places of refuge for pedestrians, and several blind corners or crests. The southern lane is narrower still, also tightly enclosed, and with blind spots closer to the junction with Lynch Road. There is next to no doubt that parents would not walk their children to the primary school along these lanes, and few people would walk to any other village facilities unless they had to.

For the TA to justify its claim that Thorverton is a walkable neighbourhood, it would have been useful for it to have included pedestrian counts at different times of year and at important times such as school starting and finishing times, and bus arrival times. The school itself has a poor environment for pedestrians, with no footways, walls hard up against the roadway, and no sightlines out of the school gate, so it is not conducive to access on foot by children, especially if unaccompanied.

Walking and cycling thresholds

The TA quotes the widely accepted thresholds for walking and cycling - one mile for walking, five miles for cycling – to argue that all the village facilities are within walking distance from the housing scheme, and even the farm shop is within cycling distance. In practice, though, the threshold figures are not as clear-cut as they may sound:

- The thresholds are the distance up to which it may be worth encouraging people to walk or cycle: the proportion of people who would consider regularly walking or cycling drops rapidly once the threshold is reached, so there is less value in promoting measures for longer distances.
- It is incorrect to say that most people will walk or cycle at the threshold distance: in practice there is a distance-decay pattern, in which the numbers drop steadily as distance increases, then rapidly from the threshold onwards.
- The thresholds take no account of the propensity of individuals to walk or cycle, applying only to those who would consider walking or cycling in the first place

TA 4.7 paraphrases the 'Planning for Walking' report (CIHT 2015) as saying that "*Most people will walk to a destination that is less than one mile"* (TA 4.7 first bullet). This gives the impression that most people would walk a journey of just under one mile. The report in fact says that

"Across Britain about 80 per cent of journeys shorter than 1 mile are made wholly on foot" (CIHT 2.1)

In line with the distance-decay pattern discussed above, a significant majority of that 80% are much less than a mile, and far fewer are just under one mile: this should not be used to suggest that 80% of people who walk for some journeys will walk one mile.

More recent data from the Active Travel Survey https://www.gov.uk/government/statistics/walking-and-cycling-statistics-england-2023/walking-and-cycling-statistics-england-local-area-walking-and-cycling-rates-active-lives-survey provide better information on the propensity to walk or cycle. This separates leisure journeys from 'travel' journeys (taken to mean a journey to a destination for a purpose connected with the destination). This indicates that, for journeys of more than five minutes:

- 37% of people walk for a travel purpose at least once a week
- 5% of people cycle for a travel purpose at least once a week

These are national averages, but there are also figures for regions, and SW England is close to the national average on both counts. In both cases, they are averages for urban and rural journeys combined, so the percentages are may well be lower for rural areas. This puts into perspective the TA's exaggerated claims that walking or cycling will make a significant contribution to modal share: a large majority of trips to and from the housing estate will be by car.

Bus services

The TA suggests that since there are six daily bus services from Thorverton to Exter and Tiverton, residents of the new housing will be able to travel further afield by bus, including commuting to Exeter and connecting with trains at Exeter St David's. A bus service at roughly two hour frequency between around 08.00 and 18.00 is nowhere near adequate to tempt most car-available people to use it in preference to the car. It is at best a safety-net service for people with no car availability, predominantly used by elderly people and possibly by students accessing higher education.

It is especially unlikely that commuters to Exeter would use the bus regularly. There is only one bus that arrives in Exeter before 09.00, and two peak hour returns (17.05 and 18.00). For the bus to be at all practicable, the limited timings would have to fit with work patterns and there would have to be a stop close to the workplace. The consequences of missing the one usable bus, especially in the evening, are significant, and there is no flexibility to work later or do other things on the way home.

Again, it would have been helpful for the TA to survey existing bus users, as evidence of how many people travel by bus, their demographic, journey purpose, and car availability. It is illusory to suggest that bus travel will play a remotely significant part in trips from the scheme (see also section on parking standards below).

For train connections connecting by bus, the earliest possible departure from Exeter St David's would be around 0840, and the latest arrival around 1745, with only four further connections between those times. In practice, the possibility of late running trains means that most people would not rely on a 15 minute connection for the last bus home, so the window of opportunity for bus/ train travel would be even shorter.

Travel Plan

A Travel Plan is an evidence-based strategy which builds up a picture from a baseline of how people travel at the outset; what interventions could shift travel behaviour over a given timescale; and the forecast magnitude of change brought about by each intervention. Although originally conceived for workplaces with an existing workforce, travel plans extended to cover new workplace developments where the baseline had to be estimated, to residential travel plans for which the baseline of residents and variety of trip purposes and destinations is of necessity wide.

A meaningful travel plan therefore has to start from an assessment of baseline conditions; work through the range of possible transport interventions; assess the viability of each intervention; set modal shift targets over given time periods; monitor outcomes; and recommend changes in response to outcomes.

The TA 'Travel Plan' does none of this. It is what it calls itself, a 'Travel Plan Framework', little more than an inventory of matters to consider when formulating a travel plan, with a scattergun list of interventions that can be considered. The TA actively opts out of targets, stating that *"No formal modal share targets are proposed given the scale of the development"* (TA 8.9). This is illogical, since without a statement of aspirations to reduce travel by car there is no way of assessing the travel plan's effectiveness as a key component of the planning application.

The illogicality goes a step further in the proposal. Having stated that the development is too small for travel plan targets, the TA proposes the appointment of a travel plan co-ordinator (TA 8.11). Travel plan co-ordinators are generally appointed only for large employers – universities, hospitals, local authorities, industrial sites – or for multiple operators on one site. It would not be viable to have a dedicated co-ordinator for a development of 66 dwellings, and it is doubtful whether anyone with the necessary expertise could do the job even part-time.

Road safety

The TA has promised a road safety audit as part of the planning application, but it has not been produced so cannot be assessed. There are a few references to road safety, with two main assertions:

- The shared surface of village streets and country lanes cause traffic to drive more slowly and carefully, so Thorverton is a generally safe place to move around by all modes
- The accident record shows no accidents within the past five years, affirming that the streets and lanes are safe

As discussed earlier, roads not only have to be safe for all road users, they have to feel safe for all users, otherwise walking, wheeling, and cycling will be very limited. There is no doubt that the lanes alongside the housing scheme feel unsafe and unpleasant to the more vulnerable road users, for the reasons outlined previously. The absence of other road users can in itself be a reason for low accident rates. There are also questions over whether the village streets, which are not without safety concerns for pedestrians given the lack of footways, would continue to feel safe with the larger number of vehicle movements generated by the development.

It is therefore unsound to conclude that the network of village streets and country lanes in and around Thorverton will remain safe, when by their very nature there are clear and evident road safety concerns.

Residential parking standards

The control of levels of parking provision is a key measure that can be used to manage demand for travel by car. The 2001 revision of PPG13 introduced maximum parking standards with the aim of preventing over-provision of parking in new developments. The attempt was largely abandoned by later governments, along with other elements of PPG13 regarded as too radical for the motoring public, but the central objective of sustainable transport policy remains, seeking to restrain car use and promote alternatives, and it is recognised that the level of parking provision has a role to play. Although a return to maximum parking standards has not happened, there has been a shift away from accepting unfettered levels of parking.

Mid-Devon County Council (MDDC) has a residential parking standard in its 2020 Local Plan Review (Policy D5), for a minimum of 1.7 spaces per dwelling on any new housing development. This derives from

Supplementary Planning Guidance published in 2013, which sets out a detailed and reasoned basis for the standard (https://www.middevon.gov.uk/media/85179/parking_spd_june_cabinet_2013_portrait.pdf Table 1). This starts with a basis of 1 parking space per household, then adds increments for multiple car households using census data for percentages of households in MDDC area with 2/3/4 cars, then adds 0.1 spaces per dwelling for visitors.

The parking standard for the Thorverton development is not **1.7** spaces per dwelling, but **2.7**. This is not impermissible, since the MDDC standard is a minimum: but it clearly expresses the developer's low aspirations for sustainable transport to be at the core of the development. All the open-market houses have two parking spaces, as do the shared ownership houses, and even some of the 'affordable'/ low rent houses. The expectation is clearly that most households on the estate will be multiple car owners, and correspondingly less likely to adopt sustainable transport practices. This clarifies the TA's approach – residents could walk, cycle, or use public transport but it is not expected that they will.

Trip generation

The TA section 6 uses standard TRICS methodology to estimate the number of trips generated by households in the scheme. This provides a forecast that in the morning and evening peak hours 36/37 vehicles would leave/ enter the estate (TA Table 6.3), with 95% travelling on Lynch Road eastwards from the access junction (TA Table 6.4). It might be questioned why 28% of AM peak hour trips would be into rather than out of the estate (TA Table 6.1: 24/85 = 0.282 x 100), and 37% PM peak hour trips would be out from the estate. It is also questionable why in the local context 29 AM peak trips would be on foot compared with 36 by car (TA Table 6.3): the TRICS assumption is that trips on foot to school will be high in the AM peak but lower in the PM peak as most school trips are over by 17.00, but given the doubts over trips to school on foot in Thorverton, the TRICS standard calculation is probably inaccurate. I would also question whether there would be 15 car passengers in 36 car trips (TA Table 6.3), which is a high rate of multiple occupancy of cars.

That said, it is an uphill struggle to challenge TRICS calculations, and the possible amendments to the figures are likely to be inconsequential.

Traffic surveys Lynch Road and unnamed lane South of the scheme

Automatic counts were carried out on the two lanes alongside the development for one week in January 2026 (TA Fig 3.1 and Tables 3.1 to 3.3). These are claimed to show that the lanes have low traffic flows and that vehicle speeds are generally low. The results are later used to make the case that the lanes are suitable for 'shared space' walking, and that accident rates are low because vehicle speeds are low.

There are two problems with this approach:

1. A survey for one week in January is an inadequate proxy for traffic flows over the year. It is widely recognised that the optimum months for traffic surveys, avoiding extremes caused by weather and/ or holidays, are May and September, and in any case the results for any one week are unlikely to be typical even for that month.
2. As discussed earlier in this report (see section on walkable neighbourhoods), traffic volumes are only part of the assessment of country lanes as shared spaces. MfS and RDG state that shared space should preferably have vehicle speeds below 20mph, the lower the better. From the survey it is clear that many vehicles are travelling too fast to meet MfS and RDG shared space criteria, especially given the added hazards of limited forward visibility and confined spaces.

Without the additional baseline traffic surveys, there is nothing more to add.

Devon CC response to application

Devon CC issued a Highways Consultation response to the planning application on 8 October, which was very critical. It has two outright objections, one of which is that the proposal is contrary to NPPF4, policies TR6, TR3, TR4, and DP3(2)(d). As explained in the letter, these largely relate to the lack of information due to the absence of the TA Addendum, but there is a wider criticism that the TA *"does not reflect the transport vision for the development and the transport strategy for the area in which it is located"*. There is also a specific point on the travel plan, which aligns with my comments above, that it does not identify *"fallback options if initial measures do not deliver the expected outcomes"* (though I would further suggest that the travel plan does not even express 'expected outcomes' in the absence of targets).

It also outlines eight areas in which current information is regarded as inadequate. The first six are covered in this report. The implication is that if more information is not forthcoming or satisfactory, they become further objections. In summary:

1. TA has no reference to, and is inconsistent with, the 2026 Active Travel England Rural Design Guide
2. TA traffic count data unacceptable because it is confined to the lanes alongside the development
3. No coverage of existing conditions on walking/ cycling routes - *"whether they are safe; coherent; attractive; direct and comfortable"*
4. Capacity of local bus services to provide journeys further afield (not quite my point, but the same concern, that *"the site is building in car dependence and would be considered unsustainable."*)
5. No Stage 1 road safety audit
6. Travel Plan contrary to NPPF4 policy T6
7. *"the pre-application advice to provide two vehicle accesses to the site has been ignored"*
8. Construction methodology

Conclusion

The TA makes some sweeping assertions that the Thorverton housing development is in a sustainable location and meets sustainable transport criteria. In reality, it is a fairly routine housing scheme of mostly detached houses with lavish car parking provision, aimed at people who will almost certainly commute by car to employment centres several miles away, notably Exeter. It says little more than that residents could walk, cycle, or use public transport to access some facilities, without providing any convincing argument or evidence that they would do so, set against considerable evidence to the contrary.

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