Matter 8 / KKH Banner Life Interest Settlement Represented by Evolution Town Planning LLP

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Matter 8 Polegate Willingdon and Stone Cross Area Strategy

Reference: E116.C1.CS Matter 8 Rev A

Matter 8

b) Is there a clear audit trail showing how and why the preferred strategy was arrived at?

We do not consider that there is evidence of a clear audit trail which supports the exclusion of land to the north of SD6 from the urban extension. This is set out in more detail in our answers below.

e) Is the Strategy sufficiently flexible to respond to an unexpected change in circumstances?

To be sufficiently flexible to deal with an unexpected change in circumstances the proposed urban extensions of SD6 and SD7 must contain sufficient land to give flexibility in the preparation of the Strategic Sites DPD. Flexibility is an important criterion of soundness; to be effective by being deliverable a Core Strategy must contain flexibility. We are aware that development in this area is constrained by the capacity of the waste water treatment works. The Core Strategy sensibly seeks to plan for the long term till 2030. This is welcomed, but so that the plan can endure for this period and the need for frequent updating can be avoided, the Core Strategy must contain flexibility so that if, for example, the capacity to treat waste water was increased more development can come forward to better meet the areas housing needs.

SD7 contains sufficient land however we would like to see SD6 extended further north to Peelings Lane by the inclusion of a further field to add the flexibility to deliver more housing, or better quality open space, or links around the surrounding area. Our clients own this land, it is available for development and could make an important contribution to the urban extension.

h) Is SD6 Justified and deliverable?

As set out in our representations references 1200 and 1201, we do not consider that SD6 is justified without the inclusion of the land known as Lower Wells Field which is shown on the plan in **Appendix 1.** Lower Wells Field is the eastern most of the two fields outlined in red. The need for housing in Wealden is high and there are a number of sites and areas across the District where delivery is constrained by various factors. The Core Strategy should therefore contain sufficient flexibility so that land can be delivered where possible to meet the housing requirements through more detailed assessment in the later DPD's. A key component of soundness of Core Strategies is that they are flexible enough to deal with changing circumstances, and so that they can endure for the long term. Having considered the Councils plans for SD6 we consider that this proposed allocation lacks flexibility. The Core Strategy is intended to guide the Strategic Sites DPD, and in this regard it must provide as much flexibility as possible for the Strategic Sites DPD.

We understand from the Council that they propose to develop for housing the land shown hatched on the attached plan to the south of Lower Wells Field. This land slopes down towards our clients land. Any development on the hatched will therefore abut our clients land, will be prominent in the immediate landscape, and will dominate our clients land. Our clients land slopes down to the east, and because of this, further to the east the village of Westham is clearly visible. Housing is therefore a recognised feature in the local landscape. Part of our client's land, in particular the western half can therefore be developed without harm to the character of the area as residential development is a feature of the landscape, and will become a more prominent part of the landscape in the future.

The development of Lower Wells Field can create opportunities for public access. A footpath runs along the western boundary of Lower Wells Field, and the field was before it was fenced was often the subject of unauthorised public access. Opportunities exist to improve the amount of public open space and public access to a well used footpath network through the inclusion of Lower Wells Field in SD6. By excluding this field the opportunities to masterplan a high quality urban extension are constrained.

It is recognised that not all the field would be developed; most probably the south western part would take any development. The northern part of the field abuts the A27. The hedge and trees between the field and the A27 provide a complete screen between road and field and housing could be developed on Lower Wells Field without being unduly affected by traffic noise. The impact of the traffic noise would be mitigated by keeping development away from the northern field boundary where noise levels are highest and by careful design. Work done to date shows that a suitable noise environment can be achieved on the site and our clients will carry out further work to inform the preparation of the site allocations DPD.

Vehicular access to Lower Wells Field requires access across third party land to the south. This land is proposed to be included in SD6, and if allocated, appropriate phasing and access details can be incorporated to avoid ransom situations frustrating development.

To satisfy our objection, Figure 8 of the Core Strategy should show SD6 extending north to Peelings Lane in the same manner as Figure 4 in the Core Strategy Background Paper February 2011.

i) Is SD7 Justified and deliverable?

Our clients own the land known as Church Field and Pickens Wood. These form a triangular shaped piece of land with a western boundary to the Hailsham Road (B2104), and southern boundary to Peelings Lane, and a northern boundary to the A27. This is shown as the western most field outlined in red on the plan in **Appendix 1**. This land forms the eastern part of the SD7 urban extension. This land is included in the Core Strategy Proposed Submission Document as a potential allocation and in the Core Strategy Background Paper.

Our clients have made known through representations that this site is available and deliverable for development. The majority of the site is down to pasture. A small area in the southern corner is ancient woodland and it is not proposed that this is developed. The site is available for development because it was severed from the rest of the agricultural holding by the construction of the A27.

The Council has raised concerns over the deliverability of the site in their Issues and Options Strategic Sites document. These issues relate to noise from the A27, whether vehicular access is possible onto the Hailsham Road, and the impact on the ancient woodland of Pickens Wood.

We set out an assessment of the site against the PPS3 paragraph 54 definition of a deliverable site. The site is available for development now. Farming the land is difficult because it abuts the urban edge of Stone Cross on two sides. This leads to considerable problems of unauthorised access onto the site and limits the farming operation.

The land is suitable for development by being very well related to the urban edge of Stone Cross to the south and west. It is in a sustainable location being better related to the facilities in the centre of

Stone Cross than the other land in SD6 and SD7. The site has the benefit of a road frontage to Hailsham Road, and good pedestrian access onto Peelings Lane to the south which links the centre of Stone Cross and Westham. Housing development can be achieved on the site within five years. The site is in one ownership which will assist delivery, and the owners have made clear their aspirations to develop the site.

The Council has raised concerns about noise from the A27 affecting the development potential of the land. A noise survey has been commissioned. The initial appraisal which is attached as **Appendix 2** shows that noise levels along the boundary with the A27 will require the design and layout to be adapted to reduce the impact of noise. Receptor 2 shows the lowest noise from the road this is set a little further back from the road than the other receptors and shows that acceptable noise levels can be achieved on the site. In our experience on other sites noise at levels such as these shown can be mitigated through house design and site layout. In any housing layout development would not be proposed up to the A27 boundary.

The Council have also raised concerns about the vehicular access to the site. A letter from Milestone Transport Planning is included in **Appendix 3**. This states that there are no highway constraints to developing the land to the east of Hailsham Road which they call site E. They conclude that 70 homes could be developed on the site with minimal highway impact. This level of development would put less than 1 vehicle per minute onto the surrounding roads and Milestone Transport Planning conclude that a suitable junction could be developed to provide access to the site.

Pickens Wood is identified as ancient woodland and as a constraint to development. This woodland is currently subject to widespread public access as a result of its southern boundary with Peelings Lane. It is already close to built development to the south. Development of the Hailsham Road site would have to safeguard the woodland and could provide funds to enhance the woodland. We do not consider that the wood will be worse off as a result of development, and it could be enhanced through more proactive management.

Other parts of SD7 are located adjacent to the A27 and have pockets of ancient woodland on them. These sites are being proposed for housing which demonstrates that the issues discussed above can be overcome. This part of SD7 is better located in respect of shops, schools and services in Stone Cross than much of the other land which would form part of the allocations. Its allocation could enhance the public amenity in the area. Peelings Lane is a well used path and the development of the land off Hailsham Road could enhance this path by linking it to further paths through the development or to open space within the development.

This evidence shows that the development of the site is justified as its allocation would be founded on a robust and credible evidence base and it would be the most appropriate strategy

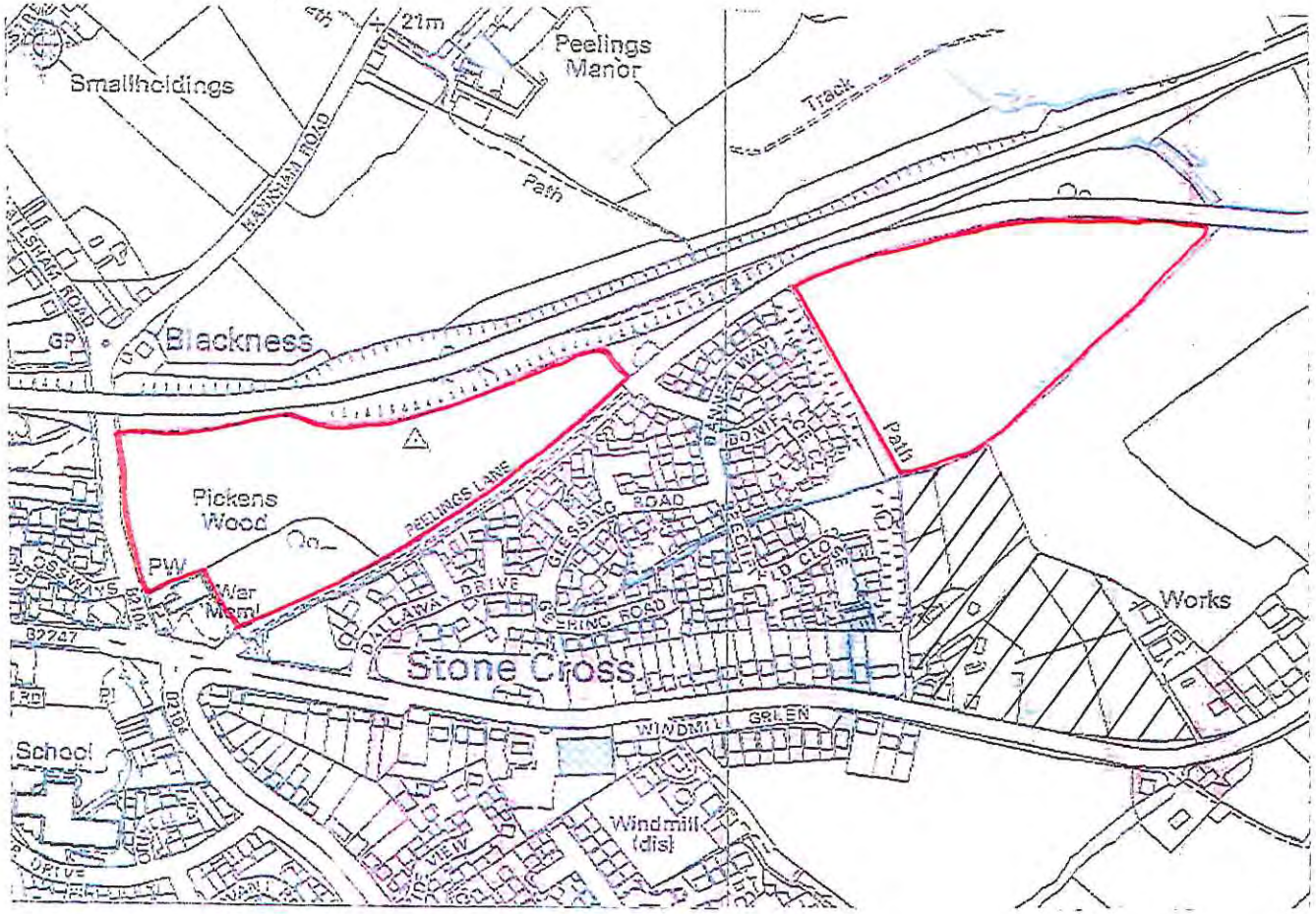
In conclusion the site is in a sustainable location for development in Stone Cross when compared to other proposed allocations in the area. The site has built development along two sides. The noise from the road can be overcome by good design and layout. The site can be served by a highway access constructed to appropriate standards. The development of the site could provide for enhancements to the ancient woodland. This woodland is already subject to widespread public access and is next to homes. The development could provide enhancements to Peelings Lane and more open space in this area which would be well used. The site is in one ownership which will assist

delivery. The site is therefore justified and deliverable. Further background on this can be found in our representation 1194.

k) Have reasonable alternatives to SD4, SD5, SD6, and SD7, been considered - omission sites?

Our response to question h above sets out that we do not consider that reasonable alternatives have been considered to the land included in SD6.

APPENDIX 1


Smallholdings
Peelings Manor
Track
Path
HAINSHILL ROAD
Blackness
GP
Pickens Wood
PW
War Mem
PEELINGS LANE
GLEASING ROAD
DALLAVAL DRIVE
Stone Cross
B2147
WINDMILL GREEN
School
Windmill (dis)
Works
Path

APPENDIX 2

Echo Acoustics

Echo Acoustics Ltd
58 Norwood Road
Great Moor
Stockport
SK2 7JN
Tel: 07913 392792
E: mike@echo-acoustics.co.uk
Doc Ref: Evol'n/Peelings/L0001/Noise
Date: 14 December 2011
Attachments: None

Mr David Barker
Evolution Town Planning LLP
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RE: Assessment of potential road traffic noise at Church Field and Wells Field, Stone Cross

Dear David,

As discussed, I have undertaken an indicative desk-based assessment of potential noise from the A27 Pevensey Bypass, as it affects Church Field and Wells Field, Stone Cross, Sussex. This letter briefly sets out the methodology and key findings of this assessment and provides an indication of the significance of those findings with respect to potential use of the site for residential development.

The assessment incorporated a desk-based calculation of road traffic noise levels from the A27, calculated at six receptor positions along the northern boundaries of the two fields, three in each field; the receptor locations are shown in Figure 1 at the end of this letter. The assessment utilised the methodology provided in the 1988 Department for Transport technical memorandum *Calculation of Road Traffic Noise,* commonly referred to as CRTN. In order to do this, the section of the A27 adjacent to the two fields was divided into 30 road 'segments' from which the cumulative noise at each receptor location was calculated, taking onto account various factors including: distance from the road; relative height of source and receptor; ground type; road gradient; traffic speed; the percentage of heavy goods vehicles. Traffic data were provided by Matt Stevens at Milestone Transport Planning, derived from the Highway Agency's TRADS database for the A27 Pevensey Bypass, which indicated that total 18-hour two-way traffic flows were 16,909 with 6% heavy goods vehicles. Road speed was assumed to be 97 km/h.

This calculation provided receptor noise levels as the 18-hour 10th percentile noise level [dB $L_{A10,\ 18\text{-hour}}$] which has been shown to correlate well with people's perception of disturbance from road traffic.

National planning policy relating to noise is provided in Planning Policy Guidance Note no 24 (PPG 24), issued in 1997. This introduces the concept of noise exposure categories (NECs) A to D with corresponding guidance as follows:

NEC	
A	Noise need not be considered as a determining factor in granting planning permission, although the noise level at the high end of the category should not be regarded as a desirable level.
B	Noise should be taken into account when determining planning applications and, where appropriate, conditions imposed to ensure an adequate level of protection against noise.
C	Planning permission should not normally be granted. Where it is considered that permission should be given, for example because there are no alternative quieter sites available, conditions should be imposed to ensure a commensurate level of protection against noise.
D	Planning permission should normally be refused.

Experience has shown that close to trunk roads and other major traffic routes, sites often fall within the range of upper NEC B to NEC C, with NEC D often encountered very close to motorways and other major roads.

PPG 24 assesses noise based on a 16-hour equivalent continuous daytime noise level [dB $L_{Aeq,16h}$] and 8-hour night time noise level [$L_{Aeq,8h}$] but provides a method for converting the dB $L_{A10,\ 18\text{-}hour}$ into a dB $L_{Aeq,16h}$ by subtracting 2 dB. No such correction factor is provided for night time noise.

The results of this exercise found that the daytime noise level [dB $L_{Aeq,16h}$] at each receptor location shown in Figure 1 was as follows:

Receptor 1:	69 dB $L_{Aeq,16h}$
Receptor 2:	62 dB $L_{Aeq,16h}$
Receptor 3:	67 dB $L_{Aeq,16h}$
Receptor 4:	65 dB $L_{Aeq,16h}$
Receptor 5:	67 dB $L_{Aeq,16h}$
Receptor 6:	65 dB $L_{Aeq,16h}$

Night time noise levels were not assessed but would generally be expected to be between 5 and 10 dB lower than day time noise. It is worth noting that the desk-based assessment methodology used may have over-estimated the ground-related attenuation factor, meaning that on-site measured noise levels may be slightly higher. In considering the noise effects across the rest of the site, a rule of thumb can be used whereby doubling the distance between the source (road) and receptor position would generally be expected to give rise to a 3dB reduction in noise.

According to the NECs presented in PPG 24, daytime noise levels in the range 55 to 63 dB $L_{Aeq,16h}$ would place a site in NEC B whilst noise levels in the range 63 to 72 dB $L_{Aeq,16h}$ would place a site in NEC C. This assessment, therefore, suggests that noise levels at the site boundary closest to the A27 are all within a range encompassing the upper level of NEC B to NEC C.

Strict adherence to the guidance in PPG 24 would indicate that planning permission should not be granted for the most north-westerly parts of this site; however, it is now generally recognised that PPG 24 is some fourteen years old and that standards of sound insulation for buildings have improved considerably such that noise exposure category C, and even D, need not necessarily preclude residential development at a site. This view point has been upheld at Public Inquiry and a more pragmatic view is often taken such that strict adherence to PPG 24 is rarely applied in all but exceptional cases.

In summary, it is my professional view that both fields site can be considered potentially suitable for residential development, subject to the provision of suitable noise mitigation measures. Such measures may include:

1. Ensuring that habitable rooms (bedrooms, living rooms and dining rooms) are, where possible, located on the opposite side of the property from the road.
2. Providing high quality acoustic glazing to habitable rooms close to and facing the road.
3. Where necessary, providing acoustically attenuating or mechanically assisted ventilation to allow sufficient trickle and large volume ("purge") air changes for residents without the need to open windows, thereby under-mining the sound attenuation that glazing might be providing.
4. Designing property layouts such that garden areas are on the opposite side of the property form the road, effectively using the property itself as a barrier and potentially providing sound attenuation in the region of at least 20 dB.

It is also worth observing that the situation is not one of a new noise source (road) affecting existing residential, but rather one of future residents moving onto a property in the full knowledge of the ambient noise environment. In this sense it is evident that potential future residents do not need to be 'protected' from personal choice.

I trust that this indicative assessment will enable a constructive dialogue with the local planning authority to be entered into with regard to suitability of the site for residential use; following an agreement in principal to residential use for the site, the indicative (desk-based) assessment may need to be supported by a measurement noise survey on the site to establish the actual noise exposure.

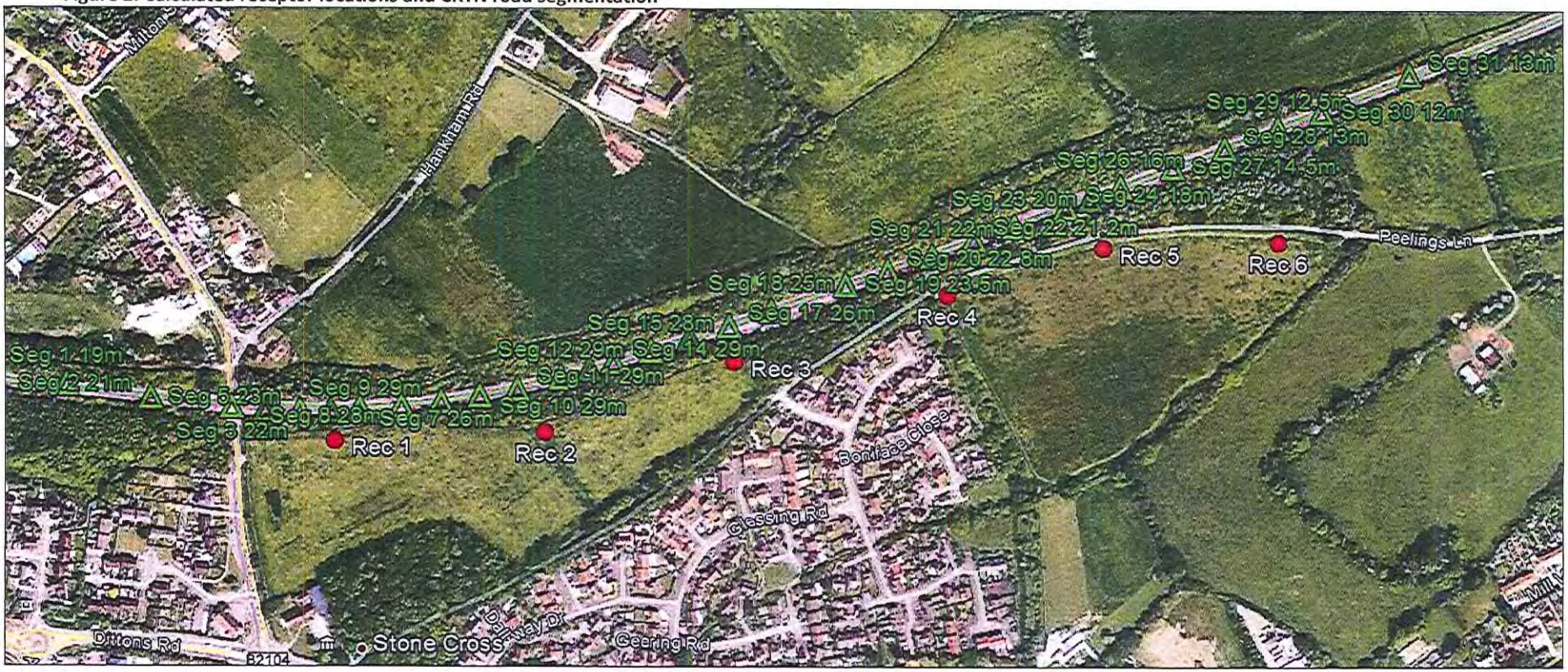
I shall await your client's further instruction but, if you have any further queries in the mean time, please don't hesitate to contact me.

Yours sincerely,



Mike Potts
Director
Echo Acoustics Ltd

Figure 1: Calculated receptor locations and CRTN road segmentation



APPENDIX 3

Area E - Land off Hailsham Road & Peelings Lane, Stone Cross

Preliminary Report on Highways & Transport Matters

prepared on behalf of The Trustees of the KK Banner Life Interest Settlement

December 2011

Introduction

The purpose of this note is to explore the highways and transport implications of the potential redevelopment of land bounded by Hailsham Road to the west, the A27 to the north and Peelings Lane to the south and east that is referred to within the Council's assessment as *Area E - Land off Hailsham Road & Peelings Lane, Stone Cross*.

The site is c. 3 hectares in size and has the potential to accommodate a residential development, under Use Class C3, of c. 70 dwellings. A key concern of the Council in respect of the potential future uses of the site is the proximity of a vehicular access off the Hailsham Road frontage to the site to the busy Dittons Road traffic signal controlled junction.

The purpose of this preliminary report is to explore the credentials of the allocation of the site for residential purposes in terms of promoting:

1. Deliverable vehicular access arrangements and an on-site layout;
2. The opportunities for sustainable transport access (thereby reducing the impact of car borne trips to the site), i.e. proximity to local community amenities, public transport connections and access to the walk / cycle network;

The preliminary report will consider the potential person trip generation of the proposed uses on the site by all modes of travel and will make a preliminary assessment of the potential impact of these trips on the operational and safety characteristics of the surrounding highway and transport networks.

Vehicular Access – Overview

It is noted that the site benefits from an existing vehicular access that is located approximately 160 metres north of the B2247 Dittons Road / B2104 Hailsham Road junction and 40 metres south of the A27 overbridge. This section of the B2104 Hailsham Road is subject to a 40mph speed limit however good visibility is afforded in both directions from the existing access that accords with DMRB standards.

The B2247 Dittons Road / B2104 Hailsham Road junction is traffic signal controlled with single lane stoplines on each of the four approaches and an 'all red' pedestrian stage within the traffic signal sequence.

Access by Foot & Cycle - Overview

The site is within 800 metres (or 10 minutes' walk time) of a range of local amenities that includes the Tesco Express foodstore on Dittons Road (c. 240 metres) and the Stone Cross School on Adur Road (c. 450 metres).

These facilities are safely accessed by way of existing footway infrastructure along the B2104 Hailsham Road and the controlled crossing facilities at the B2104 / B2247 traffic signals junction.

The site is located within c. 1.4 kilometres to the east of the National Cycle Network (NCN) Route 21 that extends from London to Eastbourne and is accessed from the A22 Golden Jubilee Way. In addition NCN 2 (South Coast Cycle Route) extends in an east-west direction to the north of the site crossing the B2104 Hailsham Road to the north-west of Hankham.

Peelings Lane, along the south-eastern boundary of the site, is also a Public Right of Way providing an off-carriageway route eastwards towards Westham.

Public Transport – Overview

The subject site is well served by existing bus services that serve a wide range of destinations, all of which are within 400 metres walk distance of the site.

The principal operator in the local area is Stagecoach in Eastbourne. They operate routes 1/1A, 55 and 56 in the vicinity of the site. In addition there are two community routes that are less frequent but supplement the main bus routes, these being 44/45 operated by Cuckmere Community Buses and route 143 operated by Renown Coaches. During daytime hours, Monday to Friday there is a combined frequency of at least four buses per hour in both directions on these routes.

Pevensey & Westham station is the nearest to the site that is operated by the Train Operating Company, Southern and provides services between Eastbourne and Hastings. The station is within cycling distance and is also served by bus routes 55 and 56. All bus routes also serve the main railway station in Eastbourne that provides trains on routes to Gatwick, London Victoria and Brighton.

Trip Generation

Using analogous sites from the TRICS database, trip rates have been derived to establish the potential additional person trip movements to the proposed development of c. 70 dwellings during the weekday AM and PM peak hourly periods as well as over a daily period (0700-1900 hours).

Table 1 - Weekday AM (0800-0900 hrs) Peak Hourly Trip Generation

Mode	Arrivals		Departures		Total Movements		Percentage Split
	Trip Rate	No. Vehs.	Trip Rate	No. Vehs.	Trip Rate	No. Vehs.	
Car Driver	0.167	12	0.404	28	0.571	40	49%
Car Passenger	0.037	3	0.175	12	0.212	15	18%
Public Transport Users	0.017	1	0.031	2	0.048	3	4%
Pedestrians	0.064	4	0.251	18	0.315	22	27%
Cyclists	0.005	0	0.015	1	0.020	1	2%
TOTALS	**0.290**	**20**	**0.876**	**61**	**1.166**	**81**	**100%**

Table 2 - Weekday PM Peak Hourly Trip Generation

Mode	Arrivals		Departures		Total Movements		Percentage Split
	Trip Rate	No. Vehs.	Trip Rate	No. Vehs.	Trip Rate	No. Vehs.	
Car Driver	0.376	26	0.225	16	0.601	42	58%
Car Passenger	0.128	9	0.075	5	0.203	14	20%
Public Transport Users	0.021	2	0.002	0	0.023	2	2%
Pedestrians	0.108	7	0.066	5	0.174	12	17%
Cyclists	0.017	1	0.013	1	0.030	2	3%
TOTALS	**0.650**	**45**	**0.381**	**27**	**1.031**	**72**	**100%**

Table 3 - Daily (0700-1900) Trip Generation

Mode	Arrivals		Departures		Total Movements		Percentage Split
	Trip Rate	No. Vehs.	Trip Rate	No. Vehs.	Trip Rate	No. Vehs.	
Car Driver	2.727	191	2.762	193	5.489	384	58%
Car Passenger	0.857	60	0.900	63	1.757	123	18%
Public Transport Users	0.106	7	0.107	8	0.213	15	2%
Pedestrians	0.947	66	1.005	70	1.952	137	20%
Cyclists	0.097	7	0.099	7	0.196	14	2%
TOTALS	**4.734**	**331**	**4.873**	**341**	**9.607**	**672**	**100%**

Based on the tables above it can be seen that over a daily period the proposed development has the potential to generate c. 672 person trip movements of which 58% would be car driver trips. During the weekday morning peak period (0800-0900 hrs) the proposed development could generate some 81 person trip movements of which around 40 movements (12 arrivals, 28 departures) could be by car. During the weekday evening peak period (1700-1800 hrs) the proposed development could generate 72 person trip movements of which around 42 movements (26 arrivals, 16 departures) could be by car.

From the above it can be seen that the additional traffic movements generated by the proposed development, even during the critical weekday AM and PM peak periods when congestion is most likely to occur on the surrounding road network, will not have a material impact on the operation of the surrounding road network.

A total of 40-42 traffic movements in the weekday AM and PM peak periods equates to less than one vehicle per minute. Furthermore development traffic will disperse over various approach routes.

As a preliminary assessment it is considered that at least 20% of traffic will head north along the B2104 Hailsham Road and that of the remaining 80% or so there will be a proportional split on the B2247 Dittons Road west towards Polegate and east towards Westham as well as south along the B2104 towards Eastbourne town centre.

Vehicular Access – Issues

Along the B2104 Hailsham Road frontage of the site there is scope to deliver a give-way controlled priority junction access that would be fully compliant in respect of geometric and safety considerations to the County Council's Highway Design standards.

Given the scale of development proposed, further capacity work would need to be undertaken to determine whether or not the proposed site access junction would require the provision of a ghosted right turn lane facility on the main carriageway. In physical terms however there is sufficient scope within land either contained within the public highway or the site itself to deliver a ghosted right turn lane, if required.

In road safety terms a give-way controlled priority junction to serve the development site off the B2104 Hailsham Road frontage could accommodate the requisite sightlines, at least to Manual for Streets standards (subject to more detailed analysis of vehicle speeds on the main carriageway that would be carried out as part of a more detailed report). It is however the case that sightlines of 2.4 metres 'x' distance by 120 metres 'y' distance, in accordance with DMRB standards, could be achieved without obstruction in both directions from the site access.

Further to more design development, the site access could accommodate pedestrian crossing facilities on both the minor arm (site access) and the major carriageway (B2104 Hailsham Road), subject to further discussions with the County Highway Authority.

At the B2247 Dittons Road / B2104 Hailsham Road traffic signal controlled junction there appears to be some scope for both or either physical and operational improvements in proximity of the junction that could be delivered within the public highway. Such physical and / or operational improvements could not only mitigate the impact of traffic generated by the proposed development but could also have the potential to provide tangible benefits to existing road users.

Such measures, that would be the subject of a more detailed report and analysis could include but not necessarily be limited to:

- Alterations to existing traffic signal cycle time and stage timings to optimise the amount of 'green time' afforded to each of the approach arms and thereby regularising queues and delays;
- Modifications to the existing junction layout to provide 'walk with traffic' pedestrian phases thereby reducing the overall cycle time, improving the operational efficiency of the junction and reducing queues;
- Physical alterations to the approach arms to provide additional lane capacity and queuing storage thereby improving the operational efficiency of the junction and reducing queues.

Summary & Conclusions

This preliminary report has considered the highways and transport implications of the potential redevelopment of land bounded by Hailsham Road to the west, the A27 to the north and Peelings Lane to the south and east that is referred to within the Council's assessment as *Area E - Land off Hailsham Road & Peelings Lane, Stone Cross* for a residential development of c. 70 dwellings.

From the initial findings of this preliminary report, the following can be concluded:

- The site is well located in respect of access to the local and strategic road network;
- The site benefits from an existing vehicular access off the B2104 Hailsham Road that is afforded good sightlines that accord with DMRB standards.
- The site is within walking distance of a range of local amenities that includes the Tesco Express foodstore on Dittons Road (c. 240 metres) and the Stone Cross School on Adur Road (c. 450 metres). These facilities are safely accessed by way of existing footway infrastructure along the B2104 Hailsham Road and the controlled crossing facilities at the B2104 / B2247 traffic signals junction;
- The site is located close to the National Cycle Network (NCN) Routes 21 and 2 and Peelings Lane, along the south-eastern boundary of the site, is also a Public Right of Way providing an off-carriageway route eastwards towards Westham;
- The site is within walking distance of a number of bus routes providing frequent services to a range of local destinations. During daytime hours there are at least 4 buses per hour in both directions on these routes (combined). Westham and Eastbourne rail stations are also served by these bus routes;
- A development of c. 70 dwellings has the potential to generate c. 672 person trip movements over a daily period of which 58% would be car driver trips. During the weekday morning peak period (0800-0900 hrs) the proposed development could generate some 81 person trip movements of which around 40 movements (12 arrivals, 28 departures) could be by car. During the weekday evening peak period (1700-1800 hrs) the proposed development could generate 72 person trip movements of which around 42 movements (26 arrivals, 16 departures) could be by car.
- Given that the site would generate less than 1 vehicle per minute onto the surround road network, even during the critical weekday AM and PM peak periods when congestion is most likely to occur and that these traffic movements will be dispersed over several approach routes, the proposed development will not have a material impact on the operation of the surrounding road network.

On the basis of the findings within this preliminary report, there are deemed to be no substantial highway or transportation reasons why this site should not be considered for proposed development.