



Land to the South of Huntsland and West of Turners Hill
Road, Crawley Down (DM/25/0014 and DM/25/0015)

Transport Assessment Addendum

Client: Wates Developments Ltd

i-Transport Ref: DS/MS/LJ/ITB9155-073B

Date: 26 March 2025

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Quality Management

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SECTION 1 Introduction

1.1 This report responds to comments made by West Sussex County Council (WSCC) in respect of Wates Developments' outline planning application for up to 200 homes on land south of Huntsland and west of Turners Hill Road. WSCC's comments are provided in a consultation response dated 13 February 2025 (ref: **Appendix A**).

1.2 Four outline planning applications, two of which are duplicate applications, have been submitted in respect of two application sites, as follows:

Land to the south of Huntslands

- a Outline planning application (appearance, landscaping, layout and scale reserved) for the erection of up to 200 dwellings, and associated infrastructure including new access points off of Turners Hill Road with associated spine roads and car and cycle parking; the provision of open space and associated play facilities; utilities infrastructure, surface water drainage features, and associated features, on land west of Turners Hill Road and south of Huntsland, Crawley Down, West Sussex. (ref: *DM/25/0014 and 0015*).

Land to the north of Huntslands

- a Outline planning application (appearance, landscaping, layout and scale reserved) for the erection of up to 150 dwellings, a 65 bed care home, and community facility; and associated infrastructure including new access points off of Wychwood with associated spine road and car and cycle parking; the provision of open space and associated play facilities; utilities infrastructure, surface water drainage features, and associated features, on land west of Turners Hill Road and north of Huntslands, Crawley Down, West Sussex. (ref: *DM/25/0016 and 0017*).

1.3 This report responds to comments on the southern of the application sites. A separate note is submitted in respect of WSCC's comments on the northern application site. Whilst many points overlap, matters relating to access are site-specific.

1.4 Many of the comments relate to evidence provided during pre-application engagement, submitted to, discussed and agreed with WSCC in principle prior to the planning applications. The pre-application documents have been formally submitted to Mid Sussex District Council (MSDC) (ref: *ITB9155-074 TN Summary of pre-application correspondence*) which provides a chronology of discussions. WSCC is requested to take into account the evidence previously submitted and now included as a submission to these planning applications.

1.5 In summary, the Transport Assessment, together with previous evidence demonstrated that the proposal is in accordance with paragraphs 115 / 116 of the NPPF:

- The site is identified as a residential allocation in the Mid Sussex District Local Plan, submitted for examination in 2024 (policy DPA9 refers). It is well located to Crawley Down by sustainable modes of transport. The TA presents a strategy for prioritising sustainable travel, including enhancements to walking and cycle routes; improvements to bus stops and services; and a car club. The strategy has been agreed in principle, subject to detailed comments addressed in this report.
- The study area will collectively be accessed by three points of access, in line with criterion ix of Policy DPA9. The application site itself will be served by two vehicular accesses in the form of priority junctions on Turners Hill Road. The access strategy has been discussed and agreed in principle with WSCC and is in accordance with the criteria of Policy DPA9. It takes on board the comments of a Stage 1 Road Safety Audit (RSA). Additional pedestrian and / or cycle connections into the site are also proposed in accordance with criterion vi, vii and viii of Policy DPA9.
- A reserved matters application will demonstrate how the internal layout of the site can come forward in accordance with relevant design standards.
- The planning applications will not cumulatively result in a 'severe' traffic impact or unacceptable safety impacts on the local highway network.

1.6 The Applicant attended a meeting with WSCC and MSDC on 17 March 2025, to discuss WSCC's consultation response and agree the additional information needed to address the matters raised; notes of the meeting are included as **Appendix B**. The key points are summarised as follows:

- Provide improvements to cycling into Crawley Down on road.
- Confirm split of Section 106 contributions between northern and southern site.
- Update Framework Travel Plan in line with WSCC comments.
- Address minor comments on the site layout.
- Provide justification for the proposed traffic calming.

1.7 Section 2 responds to the comments in WSCC's note in the same order as that in which they are raised. Section 3 provides a summary and conclusions.

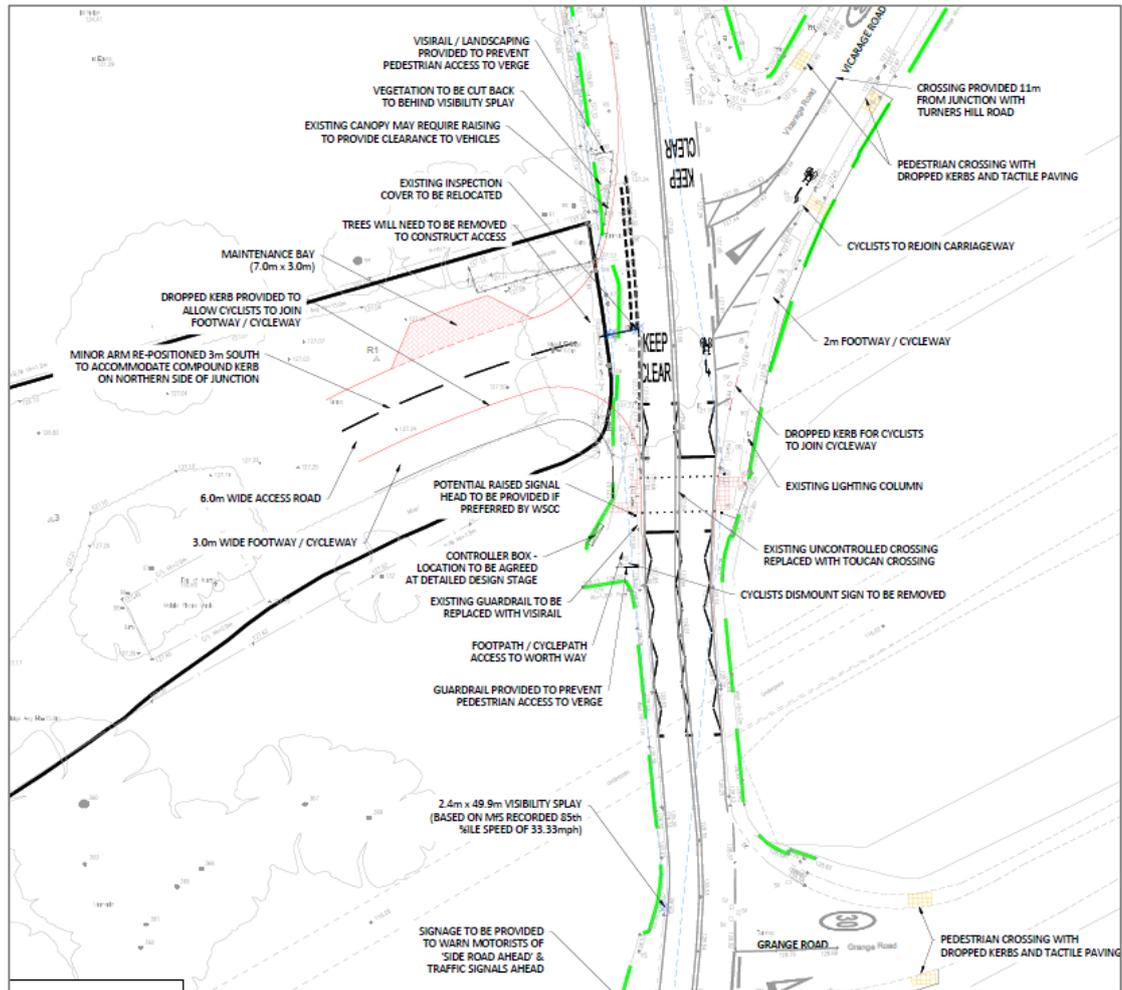
SECTION 2 Response to Comments

Access

Southern Access

- 2.1 Paragraphs 1 to 6 include no actions.
- 2.2 Paragraph 7 requests speed survey data underpinning calculations of 85th percentile speeds be provided. This is included as **Appendix C**.
- 2.3 Paragraph 8 requests an updated RSA of the southern site access which includes the signal-controlled crossing. This is included as **Appendix D**, while an updated drawing taking on board the recommendations of the audit is included as drawing ITB9155-GA-029J. The Design Team Response, prepared in accordance with Appendix F of GG119, is included as **Appendix E**. The form will be issued separately as a word file to enable the inclusion of comments from WSCC, as the Overseeing Organisation
- 2.4 The key recommendation arising from the audit is to upgrade the crossing from a puffin to a toucan, in order to facilitate cycle access across Turners Hill Road. The recommendation has been accepted by the Design Team, and a toucan crossing has been proposed. To the west of the crossing, the shared cycleway south of the access will be extended as far as the crossing and Worth Way. To the east, a 2m shared cycleway (an acceptable width where constraints are present (*ref: LTN 1/20 Table 7-2*) will be provided between the crossing and the southern end of Vicarage Road, with dropped kerbs allowing cyclists to leave the carriageways of Vicarage Road and Turners Hill Road.
- 2.5 This is also a significant improvement of the existing crossing arrangements that will benefit pedestrians emerging from Worth Way. At present, they must use an uncontrolled dropped kerb / tactile paving crossing at approximately the same location as the proposed signals. The signals will improve driver awareness of a crossing ahead while allowing pedestrians (and cyclists) to cross with priority over oncoming traffic.

Image 2.1: Southern access junction and proposed toucan crossing



2.6 Paragraph 9 requests a response to the following questions from WSCC signals team. A response to the questions is provided, based on the audited drawing.

Table 2.1: WSCC Signals team and responses

Question	Response
<p>A crossing should be located a minimum of 20m from a conflict point with a side road. Can the separation be clarified.</p>	<p>The crossing is 14m south of the centre line of the next junction to the north.</p> <p>There is no minimum clearance distance between a crossing and a junction – the relevant design standard - Traffic Signs Manual Chapter 6 - recommends that there is sufficient space for at least one waiting vehicle. It also advocates striking a balance between giving drivers time to move away from a junction and brake and minimising deviations from pedestrian desire lines (<i>ref: para 15.12.1 and 3</i>).</p> <p>A 14m gap is more than sufficient for a typical car (usually no more than 5m long) to wait at the stop line. The separation available also minimises deviation from pedestrians’ or cyclists’ desire lines.</p> <p>The crossing cannot be located further south because the carriageway and footway is constrained by the width of the bridge. Root protection areas prevent the siting of a footway (and therefore crossing) on the northern side of the junction. The crossing is around 4m from where the existing uncontrolled crossing is located and is a significant improvement on it. There is no scope to relocate further from the junction.</p>

Question	Response
<p>There is a comment on the drawing stating the width behind a signal pole of 0.79m. This distance is substandard; the absolute minimum required is 1.2m, however our preferred minimum is 1.5m to enable wheelchairs/pushchairs to safely pass.</p>	<p>This is no longer applicable The latest access drawing shows a 2m clearance behind the pole. The hardstanding will be widened using highway verge behind the existing footway. 2m exceeds these minima and is an acceptable shared cycle route width (<i>ref: LTN 1/20 Table 7-2</i>)</p>

Question	Response
<p>There are a number of established trees which have the potential to impact approaching driver & waiting pedestrian visibility. A green man is only an invitation to begin crossing, and pedestrians should be able to see the approaches clearly; anyone crossing from West to East may have challenges observing southbound traffic flow</p>	<p>Whilst DMRB / TSM Ch. 6 includes no requirement for visibility to / from waiting pedestrians at signal-controlled crossings – the key test is driver visibility to signal heads - visibility splays between a pedestrian waiting to cross on the western side of the road and oncoming vehicles can be achieved to the stated stopping sight distance (<i>ref: Appendix F</i>).</p> <p>The sightline towards a pedestrian on the western side passes very slightly under the canopy of a tree. However, in order to secure visibility between vehicles and pedestrians, the sight line must be retained at a height of under 2m. The canopy does not extend this low, although it will need to be maintained to secure continued visibility.</p> <p>Again, it is important to note that the proposed signal-controlled crossing is a significant improvement on the existing crossing arrangement at this location, benefiting not only residents of the proposed development but existing users of Worth Way and the wider Crawley Down community.</p>

Question	Response
<p>Every signalised crossing requires street lighting, and there does not appear to be suitable locations to install lighting columns. This would need to be checked with the authorities PFI provider, to ensure the proposed crossing can be suitably lit</p>	<p>There is street lighting at the junction with Grange Road and on Vicarage Road. The crossing does not appear to be any more remote from lighting than the signal-controlled crossing by Huntsland. The level of lighting of the column is acceptable and the puffin crossing to the north, which is similarly sited in relation to lighting columns, sets a local precedent.</p>
<p>It is important to identify the proposed location for the signals controller and location for a maintenance bay.</p>	<p>A maintenance bay is identified adjacent to the proposed access road. The controller box can be provided immediately south of the signals, and is indicatively shown on drawing ITB9155-GA-069A. The matter can be confirmed at the detailed design stage.</p>

- 2.7 Paragraph 10 requests continuity for cyclists riding from the access road across to Vicarage Road. This comment has been addressed through the revised access and toucan crossing arrangement, which will enable cyclists to cross Turners Hill Road using the crossing, ride along the cycleway at the southern end of Vicarage Road and then join the carriageway to continue their onward journey.

Road bridge over Worth Way

- 2.8 At the meeting of 17 March 2025, further evidence was sought to demonstrate that the footway across the road bridge south of the southern access will operate acceptably, noting that HGVs commonly use it and that the footway falls below the recommended 2m width, meaning tall vehicles commonly pass close to pedestrians.
- 2.9 The footway is 0.85m wide at its narrowest point, the northern end of the bridge. This is sufficiently wide for pedestrian passage (*ref: MfS Figure 6.8*). It widens to 1.2m at the southern end, sufficient for an adult and child to walk side by side. The carriageway on the bridge is 5.8m to 6m wide. This is sufficient for cars and HGVs to pass one another and is also sufficient for two HGVs to pass (*ref: MfS Figure 7.1*).

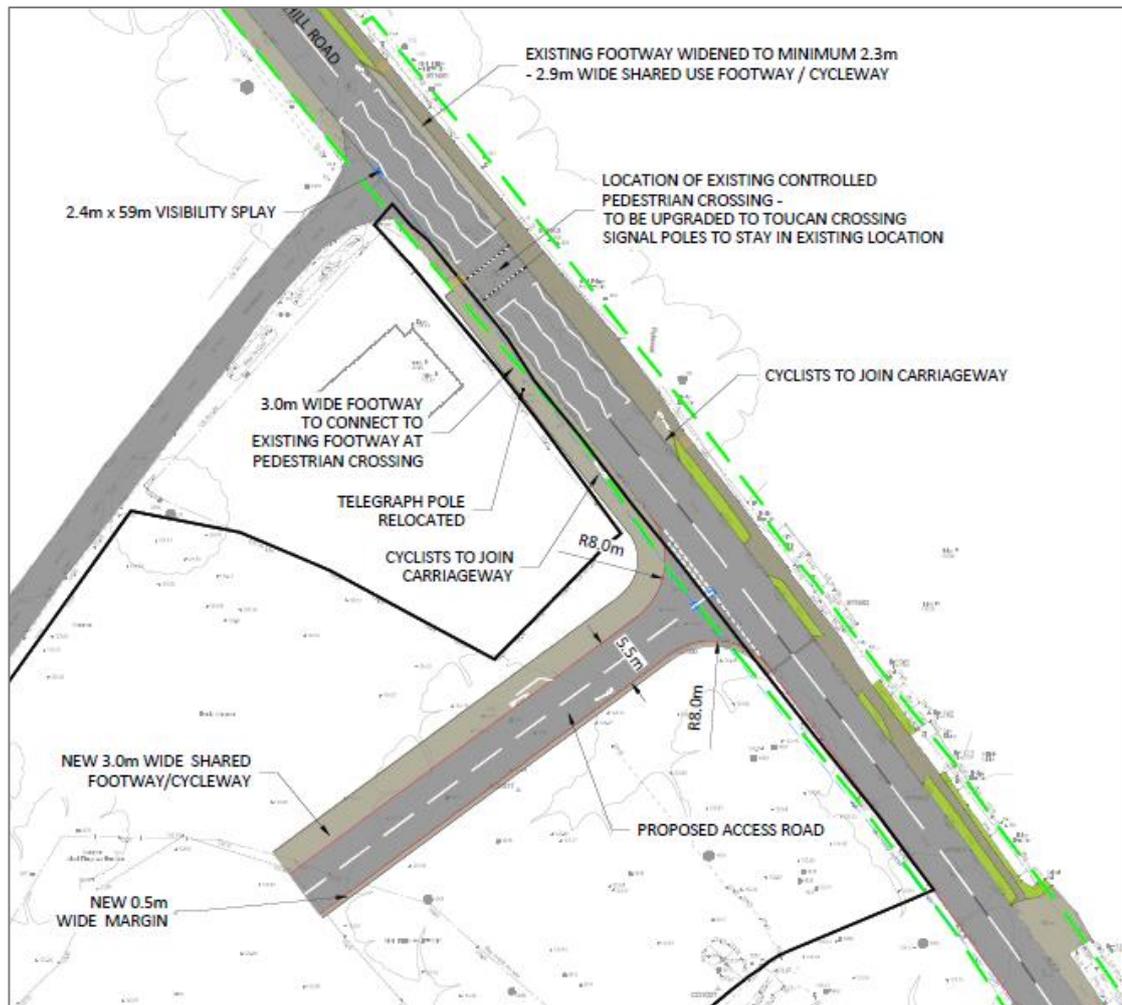
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- 2.10 Pedestrian demands on the bridge are low and Turners Hill Road south of the village will not be a key desire line for residents – with few services or homes located in this direction. Some residents in the southern part of the application site may walk to the pair of bus stops south of the village, although this alone is unlikely to materially change walking demands on the bridge, noting there is a second bus stop with an additional service, in the north of the village.
- 2.11 Similarly, development traffic increases on the bridge will be low – no more than around one vehicle every two minutes during the weekday peak hours (*ref: Figures TF8 and 9 in Scoping Note ITB9155-044A of 17 April 2024*). Crucially, there is no reason why the number of HGV trips over the bridge would increase - a Construction Traffic Management Plan can be secured by planning condition and used to control routing of large vehicles during site construction, if required.
- 2.12 There have been no injury accidents on the bridge in the latest available five-year period (*ref: Transport Assessment, Section 3.5*).
- 2.13 A second bridge for pedestrians, immediately west of the existing bridge, was suggested as a means to overcome the identified risks at a pre-application meeting on 20 November 2024 (*ref: Transport Assessment Section 6.4*). It was subsequently agreed with WSCC that a bridge would not be fairly and reasonably related in scale and kind to the development proposal and would therefore fail a key test for planning obligation presented at paragraph 58 of the NPPF and Regulation 122 of the Community Infrastructure Level Regulations (2010). A bridge would be a disproportionate solution to the sub-standard footway, given the very modest impact of development on travel demand on the bridge.

Central Access

- 2.14 Paragraph 11 summarises the central vehicular access to the allocation site (or northern of the two vehicle accesses into the application site). It contains no actions. Paragraph 12 requests speed survey raw data and this is provided at **Appendix G**.

2.15 Paragraph 13 requests continuity for cyclists across the B2028 from the central access. Accordingly, an updated drawing is provided as drawing ITB9155-GA-038I, showing 3m cycleways along the access and extending as far as a new toucan crossing (where the existing puffin crossing is located) and then leading to short sections of cycleway of 2.1m to 2.4m (exceeding LTN1/20's minimum of shared cycleways) on the eastern side. The widening is provided by converting a short section of verge to footway, which end at dropped kerbs where cyclists can rejoin the carriageway. The drawing is presented as an alternative to the vehicle access drawing at drawing ITB9155-GA-038H. Its purpose is to enable cyclists to cross the B2028 Turners Hill Road with priority over traffic, consistent with the objectives of paragraph 115(a) of the NPPF, rather than wait at the give way line. The crossing will aid less confident cyclists. The revised access arrangement is illustrated below.

Image 2.2 – Revised central access with toucan crossing



2.16 Paragraph 14 requests an editable Designer's Response. This will be provided separately as a Word document. It should be noted that the Safety Auditor has been informed of the proposal to provide a toucan crossing north of the central access and provided with an updated drawing. The Auditor has raised no additional safety comments related to the change to the proposed arrangements. A letter from the Auditor is provided at **Appendix H**. It raises detailed comments for consideration at detailed design stage but no in-principle safety concerns not considered through the earlier audit.

2.17 Paragraph 15 contains no actions.

Active Travel

2.18 Paragraphs 16 and 17 include no actions.

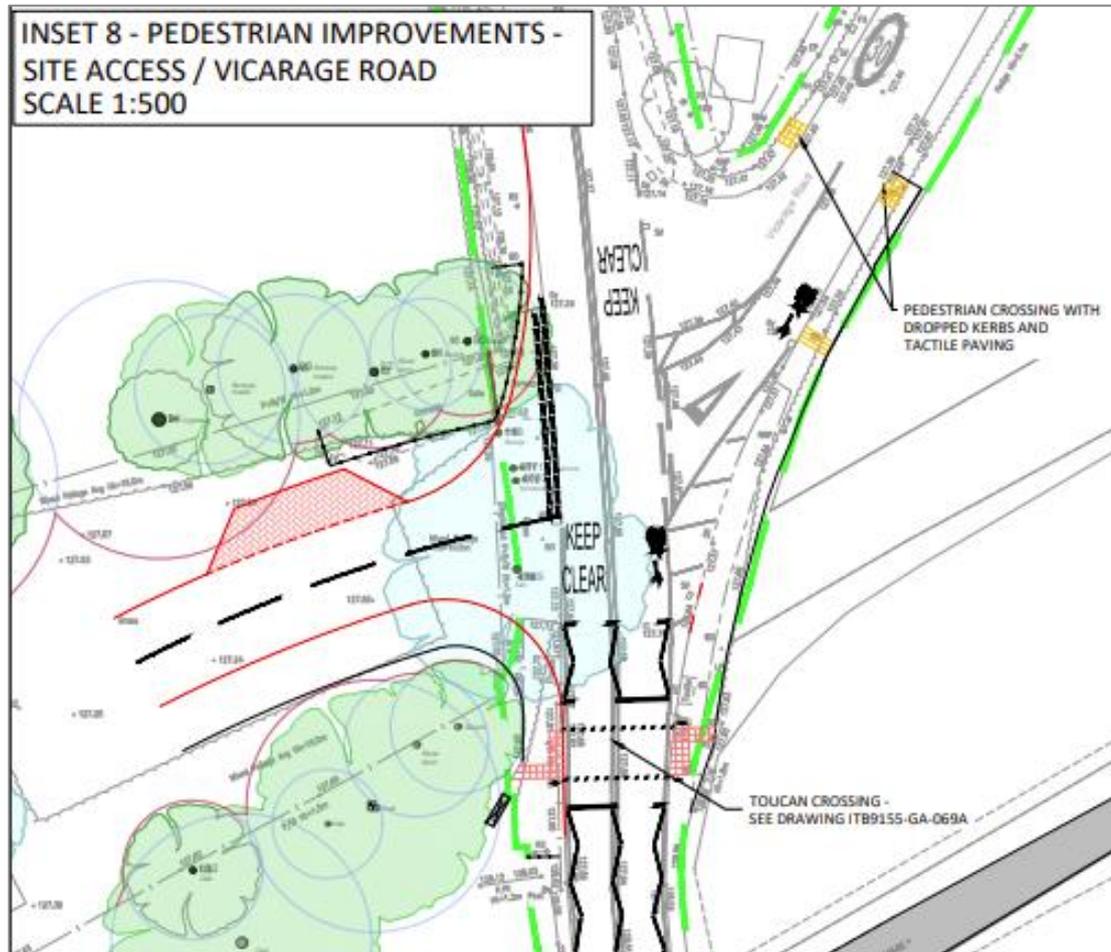
2.19 Paragraph 18 requests that the Applicant sets out how a Section 106 contribution towards the bus service enhancements will be split between the two sites, noting that a 50/50 split could give rise to viability issues should one of the sites not be implemented. The matter has been discussed further with the local bus operator, Metrobus, who support the approach of each application site paying 50% of the total contribution sought. This would allow each planning permission to fund the service for 2.5 years. This approach, in effect, provides a 'buffer' of 2.5 years between the implementation of the two schemes. Correspondence with Metrobus is included as **Appendix I**.

2.20 Paragraph 19 requests that the applicant sets out how financial contributions or works are split between the sites. A proposal is included at **Appendix J**.

2.21 Paragraphs 20-24 recommend the following changes to the off-site highway improvements, which are also illustrated in drawing **ITB9155-GA-056C**:

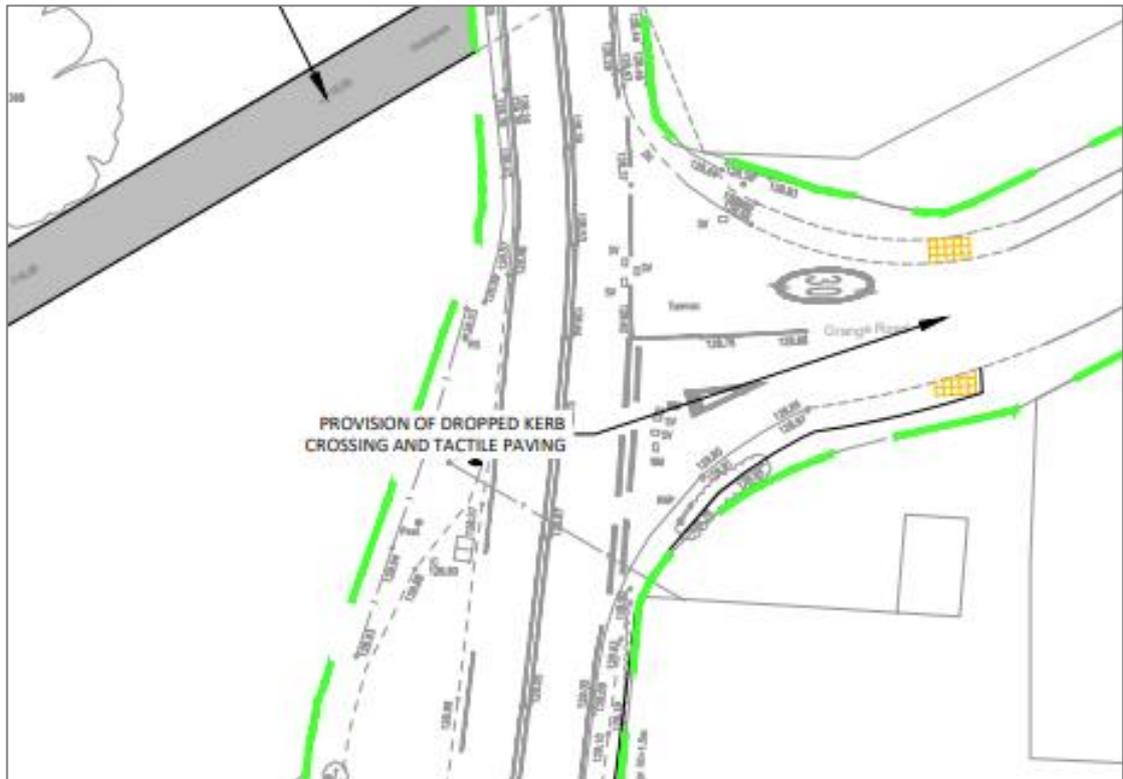
- The crossing point on Vicarage Road has been relocated further from the junction with Turners Hill Road (*ref: paragraph 15*):

Image 2.3: Crossing point on Vicarage Road



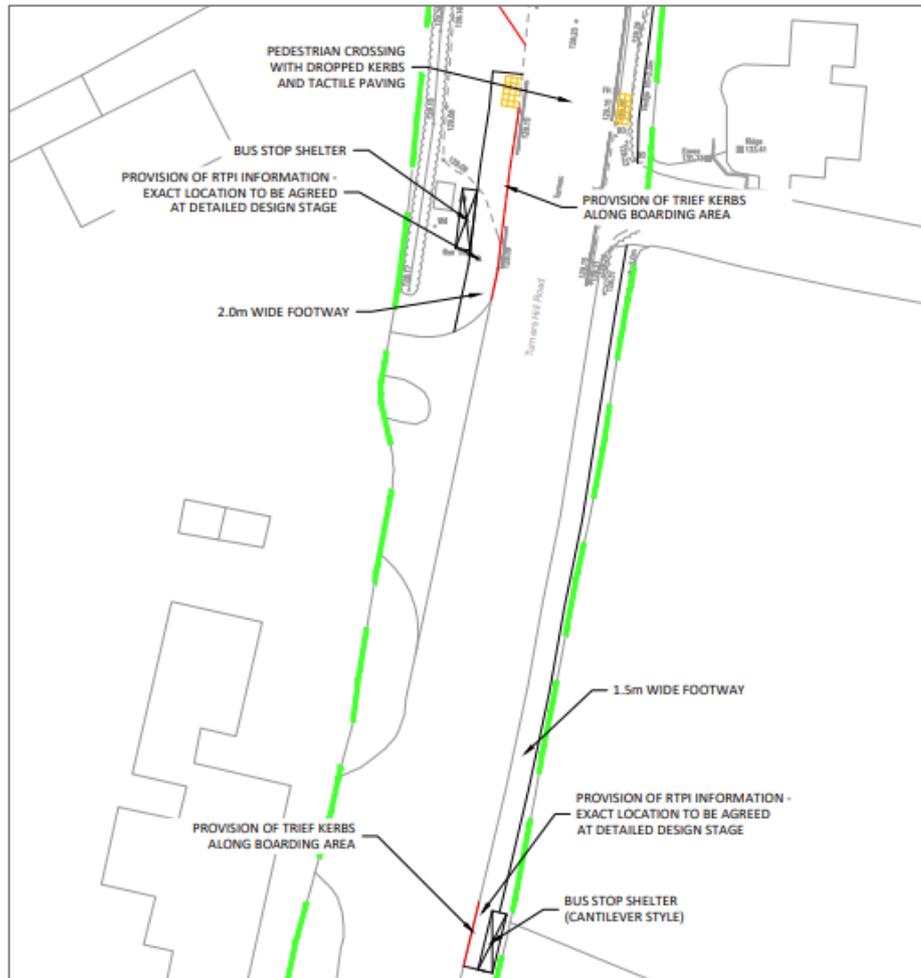
- The crossing point on Grange Road has been relocated further from the junction with Turners Hill Road and a 1.2m footway added within existing highway land.

Image 2.4: Crossing point on Grange Road



- Vegetation clearance and surface improvements are proposed on the footway on the eastern side of Turners Hill Road between Sandy Lane and Vicarage Road.
- The northbound bus stop and crossing point on Turners Hill Road has been relocated further from nearby access.

Image 2.5: Northbound bus stop south of Grange Road



2.22 Paragraph 25 is noted.

2.23 Paragraph 26 seeks further on-road improvements to access to the village centre for cyclists. At the meeting on 17 March 2025, WSCC confirmed that their key priority would be to improve crossing for cyclists using Turners Hill Road. To achieve this, as set out previously:

- a The proposed puffin crossing south of the southern access has been revised and a toucan crossing, in line with the Safety Auditor's recommendations.
- b The existing puffin crossing north of the proposed central access will be upgraded to a toucan crossing. The proposal has been agreed with the safety auditor.

2.24 The toucan crossings will also in themselves help to reduce vehicle speeds and improving the overall cycling experience.

-
- 2.25 Beyond improving the crossings on Turners Hill Road, scope for improving the streets that lead into the village is more limited (*ref; Healthy Streets Assessment appended to Sustainable Transport Strategy ITB9155-045 TN, dated 19 December 2024*):
- Turners Hill Road is some 6.0-6.5m wide – sufficient for cars to overtake cyclists. It has two-way peak hour traffic flows of 750 to 800 vehicles per hour. There is a continuous footway on the eastern side, often together with verge. The combined width of the footway and verge is typically at least 2m, although there are constraints (e.g. south of Sunny Avenue) where the width falls short of this.
 - Sandy Lane is around 5-6m wide, again sufficient for overtaking of cyclists and consistently wide enough for a car and HGV to pass at low speeds. Traffic flows are lower, with no more than 200 vehicles per hour or three per minute. There is limited highway land beyond the carriageway, typically less than 2m on either side.
 - Similarly, Vicarage Road is around 5m wide – sufficient for overtaking cycles and wide enough for a car and HGV to pass. Traffic flows are similar to Sandy Lane. There is a continuous footway on the southern side of the road although again its width is below 2m at locations along its length.
- 2.26 There is insufficient land on these roads to provide a continuous shared cycleway without reducing carriageway or layby widths. Reducing carriageway widths below 5m, as would be necessary on Sandy Lane and Vicarage Road, the key routes into the village, will compromise access for HGVs.
- 2.27 The alternative to provide cycling lanes is to introduce carriageway demarcation, to enable shared use of the carriageway. Given the widths of Vicarage Road and Sandy Lane, this would result in the encroachment of the lanes by vehicles when there is oncoming traffic. Whilst the Applicant would be willing to deliver such a scheme of improvements, it is understood that WSCC's strong preference to avoid measures involving carriageway demarcation / lining.
- 2.28 The proposed toucan crossings over Turners Hill Road will materially improve the ability for less confident or experienced cyclists to ride into Crawley Down on road by allowing them to stop traffic on Crawley Down and cross the road with priority over the traffic.
- 2.29 Paragraph 27 requests that the Applicant confirms physical improvements should be delivered as schemes of works (other than on Worth Way and enhancements to the bus service). This is confirmed and can be secured as part of the Section 106 Agreement.

- 2.30 Paragraph 28 notes that Worth Way is not a right of way but is owned by WSCC. It is understood that WSCC were notified of the planning application. Wates Developments requests that WSCC, as landowner, be consulted on the planning application to ensure that agreement on the principle of improving the path can be reached and that a financial contribution towards enhancements may be included within the S106 Agreement through appropriate wording.
- 2.31 Paragraph 29 requests amendments to the Travel Plan. An updated Travel Plan has been produced taking on board the amendments below and is submitted separately.

Table 2.2: Travel Plan comments and amendments

Comment	Solution
Caution when using 2021 modal splits.	As an alternative, the applicant proposes a to use 2011 census data.
Any targets should not be based upon existing travel characteristics	Vision-led targets will be included, based on the aspirational mode share of the scheme, taking into account the sustainable transport strategy. Notwithstanding the adoption of vision-led transport planning formally through the new NPPF of December 2024, this approach has been pursued throughout pre-application discussions through the development of the sustainable transport strategy.
Confirmation that the car club will be secured by a separate S106 obligation. This will need to include details of the car club locations.	Agreed and noted. However, the location of the car club spaces will need to be agreed through a Reserved Matters application.
Consider an alternative form of monitoring to questionnaires	The Travel Plan will be monitored based on multi-modal entry / exit demand surveys at all access points, supplemented by travel questionnaires

Vehicle trip generation and highway capacity

- 2.32 Paragraph 30 outlines the traffic analysis and requests the background evidence is submitted. This information has now been submitted as part of document *ITB9155-074* No further comments were raised by WSCC in respect of traffic analysis.
- 2.33 Paragraph 31 contains no actions. Paragraph 32 outlines the attributes of the vision-led approach and paragraph 33 requests the Travel Plan be revisited, as noted above.

2.34 It was agreed during the meeting of 17 March 2025 that no further actions needs to be taken in respect of these paragraphs. The previously submitted traffic analysis therefore demonstrates satisfactorily that there will not be a 'severe' traffic impact on the highway network whilst the sustainable transport strategy demonstrates that the proposal prioritises travel by sustainable modes.

Layout

2.35 Paragraph 33 requests details concerning street hierarchies and parameters that can follow into the detailed design of the proposal. The Design and Access Statement outlines street design and street typologies. A street hierarchy is presented in Section 5 of the Transport Assessments.

2.36 Paragraph 34 requests that the Access and Movement Parameter Plan includes the indicative alignment of the route of the north-south cycle route links to right of way 33W and Worth Way, via the southern parcel. This is shown at **Appendix K**.

2.37 Paragraph 35 requests that the connection to Hurst Farm be considered in greater detail as the scheme progresses. This is agreed - more detailed plans will be provided at RM stage.

2.38 Paragraph 36 requests that external pedestrian / cyclist be considered in greater at reserved matters stage. This is agreed.

Other matters

2.39 Paragraph 37 outlines the submitted traffic calming scheme and paragraph 38 requests details of what the traffic scheme seeks to achieve. The purpose of the traffic calming is to reduce vehicle speeds on Turners Hill Road, noting this is an aspiration of Worth Parish Council.

2.40 Whilst the traffic calming is desirable, there is no accident history on Turners Hill Road that would suggest a need to introduce such measures. Whilst the Applicant is willing to include the measures as part of the off-site highways improvements, WSCC has noted that as they are not necessary to make development acceptable in planning terms, they do not meet the tests at paragraph 58 of the NPPF or Regulation 122 of the Community Infrastructure Levy Regulations (2010) and therefore do not need to be provided. The proposed traffic calming scheme is therefore withdrawn.

2.41 Paragraph 39 includes no actions.

SECTION 3 Summary and Conclusions

3.1 This note fully addresses the comments raised in WSCC's consultation note in respect of a planning application for up to 200 homes on land south of Huntsland and west of Turners Hill Road, Crawley Down. The application is submitted jointly with a further planning application for 150 homes and a 65 bed care home on land immediately to the north.

3.2 Through extensive pre-application discussions, now submitted to the planning application file, there is agreement on the following:

- The site is in a sustainable location for development and the sustainable transport strategy presents a vision for an access strategy that prioritises sustainable transport over car use
- The proposed vehicular accesses to the application site provide safe and suitable access and will operate acceptably.
- A reserved matters application will demonstrate how the internal layout of the site can come forward in accordance with relevant design standards.
- The two planning applications will not cumulatively result in a 'severe' traffic impact or unacceptable safety impacts on the local highway network.

3.3 The note responds to the comments of WSCC and demonstrates:

- The off-site highways works will be implemented through Section 278 works where feasible and can be split appropriately between the sites.
- Cycling improvements into Crawley Down can be achieved by upgrading the existing / proposed signal controlled crossings adjacent to the two vehicular accesses to toucan crossings.
- Two toucan crossings can be provided to facilitate cycling across Turners Hill Road and thus improve on road cycling into the village centre.
- The Travel Plan has been updated with revised modal shares, vision-led targets and monitoring using traffic surveys. The Travel Plan is submitted separately.
- The previously submitted traffic calming is not necessary to make development acceptable in planning terms, and has been withdrawn from the proposal.

3.4 On this basis, the proposal addresses the comments of WSCC and is in accordance with paragraphs 115 / 116 of the NPPF:

- The proposal prioritises sustainable transport.
- Safe and suitable access will be provided.
- Future reserved matters applications will ensure that the proposals will come forward in accordance with design standards.
- There will not be a 'severe' cumulative impact on the local highway network.

3.5 The development proposal is acceptable in highways and transport terms.

