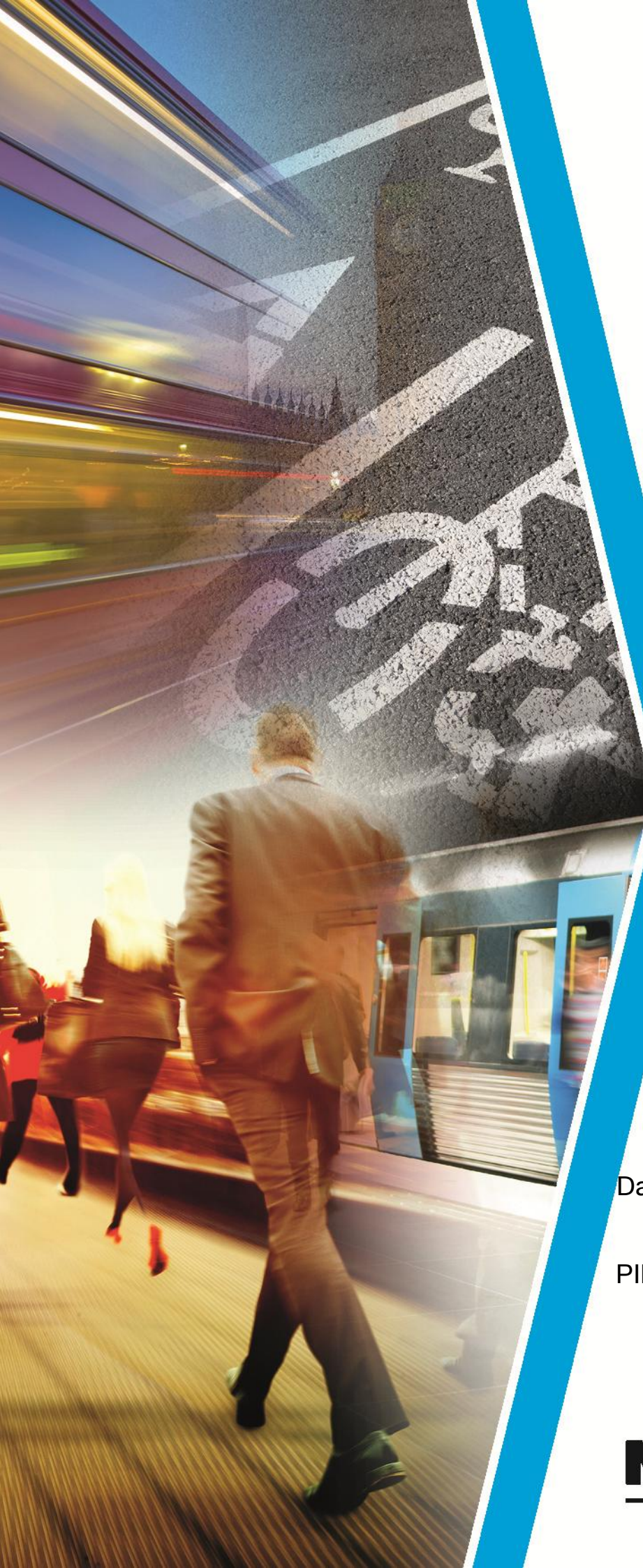




Town & Country Planning
Act 1990 (as Amended)

Appeal by Dandara
Southern Ltd & Elstree
Land Ltd

Land North of Reading
Road, Arborfield

Summary Proof of Evidence

M Stevens MIHT on behalf of
Dandara Southern Ltd & Elstree Land
Ltd

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MILESTONE
TRANSPORT PLANNING

Land North of Reading Road, Arborfield

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1. Introduction

- 1.1 I am Matt Stevens, a Member of the Institution of Highways and Transportation and an Executive Director of the firm Milestone Transport Planning Limited. I have 35 years' experience dealing with the highways and transportation implications of a wide range of projects with full assessment under National and Local Planning Policy Guidance.
- 1.2 I am an expert highways witness and have appeared both on behalf of the Appellant and as a Rule 6 representative at numerous Appeal Hearings, Section 78 Inquiries, and Local Plan Examinations; acting on behalf of major housebuilders such as Persimmon Homes and Croudace Homes, development companies such as Frogmore Investments Limited and Keir, as well as private individuals and strategic land promoters.
- 1.3 I was first instructed by the Appellant to provide Transport Consultancy services in respect of the Appeal Site in July 2025. I have visited the Appeal Site and the surrounding area on many occasions since my instruction and have a detailed background highways and transport knowledge for the purpose of giving evidence at this Appeal.
- 1.4 I have been retained by the Appellant to present highways and transport evidence at this Appeal and I am well versed in the relevant transport and accessibility policy position in Wokingham, including in relation to schemes that have been granted and allowed at Appeal where the Inspector has overruled the Council's position in regard to the unsustainable locations of sites.
- 1.5 The evidence I have prepared and provided for this Appeal is true, has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are true and professional.
- 1.6 The evidence that I am presenting to this Appeal is specifically focussed on responding to and addressing RfR 4.
- 1.7 My Proof of Evidence also addresses Additional Issue 1 (Prejudice to the delivery of Loddon Valley Garden Village ("LVGV") Principle of Development) and Additional Issue 2 (Access and Visibility Splays) raised within the Council's Statement of Case (CD04.03).

2. Policy Review

National Planning Policy Framework

- 2.1 The illustrative masterplan before the Inspector clearly demonstrates the deliverability of public open space, play areas and safe, legible active travel routes connecting these to both the internal street network and the wider community. In this regard, my evidence demonstrates that the Appeal Site proposals meet the test outlined within Paragraphs 96, 103 and 105 of the Framework.
- 2.2 My evidence clearly demonstrates the commitment of the Appellant to deliver enhanced linkages off-site to open up access by foot and cycle to local services and facilities, as well as the public rights of way network for the health and wellbeing of future residents within the Appeal Site but also to the benefit of the wider community.
- 2.3 Further, my evidence demonstrates that the Appeal Site proposals comprehensively address the requirements of Paragraph 110 of the Framework in that:
- It is in a sustainable location with access to local services and amenities and served by a frequent bus route to a wide range of local and regional destinations.
 - A comprehensive package of travel plan measures will be delivered by the Appellant to limit the need to travel.
 - A comprehensive package of off-site mitigation measures for the benefit of active travel (walking and cycling) and public transport users will further enhance the accessibility of the Appeal Site.
 - This sustainable location of the Appeal Site will be further enhanced as additional services and amenities come forward within LVGV.
- 2.4 Likewise Paragraph 115 of the Framework is comprehensively addressed within my evidence which clearly demonstrates the Appeal Sites' delivery on:
- Prioritising sustainable transport modes in the context of the vision, the type of development and its location.
 - Safe and suitable access for all road users.
 - No significant impacts on the transport network, or on highway safety.

2.5 Specifically in the context of part d) of Paragraph 115, my expert opinion is that 1) the mitigation which supports the Appeal Site proposals is vision-led and prioritises enhancement to the active travel and public transport networks to the benefit of the wider community; 2) it delivers choice to future prospective residents in travel mode when accessing the full range of facilities and services; and therefore 3) it reduces reliance on the use of private car by future residents.

2.6 With this in mind, the severity test in Paragraph 116 of the Framework is fully met by the Appeal Site proposals and, as the wording therein clearly sets out, the development should not be prevented or refused on highway grounds.

WBC Core Strategy (January 2010) Policies

2.7 My evidence demonstrates that the Appeal Site fully delivers on Core Policy CP1 (Part 11), specifically the integration with and enhancement to the existing active travel and public transport infrastructure. The collective measures proposed, in conjunction within the Appeal Site, maximise opportunities for reducing the need to travel, especially by car. Such measures include:

- Cycle parking within the development in accordance with WBC adopted standard.
- Safe and accessible pedestrian and cycle access to the Appeal Site to Reading Road and pedestrian access to Church Lane.
- Improved crossing facilities on Reading Road and Walden Avenue with associated dropped kerb and tactile paving provision.
- Direct connections with and enhancements to the existing footway infrastructure on Reading Road between the Appeal Site and Arborfield Cross, based on the findings of an Active Travel Assessment conducted in accordance with the Active Travel England toolkit, and secured by Condition.
- A significant contribution to the Arborfield Bus Strategy, securing the future viability of the 'Leopard 3' bus service, and physical enhancement to the nearest bus stops to the Appeal Site on Reading Road, the scale and extent as agreed with WBC Highway Officers.
- Measures to support home working and online shopping services, as evidenced in the submitted Framework Travel Plan.

2.8 My evidence demonstrates that the Appeal Site meets the objectives of Core Policy CP2 in ensuring that children of primary school age have access to a school within walking or cycling distance of their home (3-4kms) along a safe route.

2.9 Further, the Appeal Site meets the objectives of Core Policy 3 through the delivery of on-site play facilities and publicly accessible open space, but also through off-site active travel infrastructure enhancements providing safe access to a range of community facilities.

2.10 I also demonstrate that the Appeal Site delivers on all seven criteria that constitute Core Policy CP6, as summarised below:

- Part a) Provide for sustainable forms of transport to allow choice.
 - Provisions for cycle parking in line with WBC standards, noting that this is a Reserved Matters consideration.
 - Direct active travel (pedestrian and cycle connections) to Reading Road and Church Lane.
 - Appropriately scaled contribution towards securing the future viability and continuation of existing bus services.
 - Implementation of a measures package within the Travel Plan to achieve a 10% modal shift within 5 years of its implementation.
- Part b) Located where there are or will be at the time of development choices in the mode of transport available and which minimise the distance people need to travel.
 - Direct access to 'Leopard 3' Bus Service with 'Good Service' (as defined in the WDLP) to Wokingham and Reading, including access to major transport hubs, as well as a significant range of education, employment, retail, community, retail, leisure, and recreational destinations along its route.
 - Direct access to surfaced footway infrastructure on Reading Road.
 - Within acceptable walk distance of a nursery school, bus stops, and local shops.
 - Proximity to established Public Rights of Way network.
 - Connections to established off-carriageway cycle infrastructure with onward connections (Observer Way).
- Part c) Improve existing infrastructure network, enhance facilities for pedestrians and cyclists, including those with reduced mobility and other users.
 - Upgrades to existing footway infrastructure on Reading Road, including maintenance of existing overgrowth and widening, lighting and upgraded crossing facilities with dropped kerb and tactile paving provision.
 - Enhancements / upgrades to nearest bus stops on Reading Road including shelter provision and Real-Time Passenger Information.

- Part d) Provide appropriate vehicular parking, having regard to car ownership.
 - Provisions for vehicular parking in line with WBC standards, noting that this is a Reserved Matters consideration.
- Part e) Mitigate any adverse effect on the local and strategic transport network.
 - Acceptance from Council (CD 02.19) on matters related to traffic data, the distribution of traffic and impact in regard to the local and strategic road network.
- Part f) Enhance road safety.
 - No further comment from Council (CD 02.19) on the Road Safety Audit Stage 1 and designer's comments as far as it relates to the proposed access arrangements of the Appeal Site.
 - Acceptance from Council (CD 02.19) to the pedestrian, cycle, and vehicular visibility splays as shown on site access (CD 01.30) and emergency access (CD 01.28) General Arrangement Plans.
- Part g) Do not cause highway problems or lead to traffic related environmental problems.
 - Acceptance from Council (CD 02.19) to the measures proposed to ensure safety, reduce disturbance and the effects of construction traffic contained within the Framework Construction Method Statement (CD 01.25), subject to securing an appropriate Condition.

WBC Borough Design Guide (April 2020)

- 2.11 My evidence comprehensively demonstrates that the Appeal Site proposals align with and address the key objectives of the BDG.
- 2.12 The Appeal Site creates and adds to, a connected network for movement, promoting active travel and public transport access as well as demonstrating a physical relationship to facilities and services, open spaces, and employment (Policy G3). Further, the Appeal Site provides connections to and strengthens the existing network of streets and spaces, providing direct and attractive links to external destinations (Policy R3).

3. Baseline Site Accessibility

- 3.1 My evidence demonstrates that the Appeal Site is conveniently located to a significant range of facilities and services within Arborfield Cross, Arborfield Garrison, Shinfield and Barkham, accessible by foot and cycle.

- 3.2 Within acceptable walking distance of the Appeal Site are local bus stops on Reading Road, as well as local nurseries / schools, recreation grounds / leisure facilities, village halls, village shops / post offices, and employment areas. The facilities within Arborfield Garrison, Shinfield and Barkham are within comfortable cycling distance of the Appeal Site.
- 3.3 Whilst Arborfield Cross may not provide the full range of services and facilities needed to satisfy travel demand, my evidence fully demonstrates that the Appeal Site is well connected to surrounding settlements and benefits from direct links to higher-order centres, including Shinfield, Arborfield Green, Wokingham and Reading.
- 3.4 The Appeal Site is extremely well located to the 'Leopard 3' bus service. Bus stops less than a 1-minute walk from the centre of the Appeal Site. The current Leopard 3 timetable shows that all bus services towards Reading call at Shinfield, the Royal Berkshire Hospital, the railway station, and town centre. One bus service an hour also calls at Thames Valley Science Park. All bus services toward Wokingham call at Arborfield Green, Barkham, the railway station and town centre.
- 3.5 In terms of service frequency, the Leopard 3 bus service fully complies with the Policies CP6(a-c) and MDD Policy CC01 definition of a 'good' public transport service, enabling access for commuting / business purposes, as well as for general access to secondary schools / further education facilities, shops and civic services, and healthcare, throughout the day, including early mornings and late evenings, seven-days-a-week.
- 3.6 Using the Leopard 3 bus service, Appeal Site residents also benefit from direct / convenient connections to Reading and Wokingham railway stations, both major transport hubs provide fast, high-frequency rail connections to numerous destinations further afield along multiple regional and cross-country lines and facilitating multi-modal journeys to / from various destinations.

4. Sustainable Transport Deliverables & Future Site Accessibility

- 4.1 As set out within my evidence, the Appeal Site fully aligns with WBC's Core Strategy Policies CP1 and CP6, ensuring that the future development promotes sustainable movement, reduces travel demand / distance, enhances existing transport infrastructure, and improves highway safety.
- 4.2 I have demonstrated a clear hierarchy has been adopted, prioritising walking, cycling, and public transport as the preferred modes of travel for future residents of the Appeal Site.

- 4.3 A comprehensive package of physical measures to enhance access and permeability for active travel can be secured by Condition should the Inspector be minded to grant permission for the Appeal Site. These measures have been designed in accordance with ATE's standing advice and will create a safe, well-lit, and accessible active travel environment entirely consistent with the principles of WBC Core Strategy Policies CP1, CP3(h), and CP6.
- 4.4 In this context, the proposed physical measures are aimed at making the existing route between the Appeal Site and Arborfield Cross more commodious, thereby supporting meaningful modal shift. Any potential landscape or ecological effects arising from these works are addressed within the evidence of the relevant expert witnesses. Importantly, the detailed specification of these measures would be progressed through the Detailed Design stage and subsequent S278 process, during which opportunities to avoid, minimise or further mitigate impacts can be further explored in accordance with the mitigation hierarchy.
- 4.5 Future residents will also benefit from enhancements to public transport infrastructure in the Appeal Site's vicinity. The Appellant welcomes the opportunity to contribute to the delivery of the Arborfield Bus Strategy through a doubling of the agreed £914 per dwelling (index-linked) contribution; directly supporting the Leopard 3 bus service.
- 4.6 Additionally, should the Inspector be minded to grant permission for the Appeal Site proposals, physical measures to the Reading Road bus stops adjacent to Walden Avenue (closest to the Appeal Site) will be secured by Condition and include but not limited to: the provision of a bus boarder with kerb build-outs, new shelters, timetable / mapping information, and provision of RTI infrastructure.
- 4.7 To further reduce the car-borne travel demand of the Appeal Site, a Framework Travel Plan has been prepared and identifies appropriate measures to achieve a 10% modal shift within 5 years. These measures are fully agreed with the WBC Highway Officer and are supported by a £612 per dwelling MyJourney contribution to promote Borough-wide sustainable travel.
- 4.8 The Appellant is committed to delivering a range of additional incentives, should the Inspector be minded to allow this Appeal and planning permission by granted these could include: an EV Car Club vehicle, E-bike hire or travel voucher scheme, and provision of a Mobility Hub.
- 4.9 These additional measures align with those proposed as part of the School Road Arborfield Cross (LPA Ref. 250735) scheme, which were supported by WBC, and demonstrate a commitment to long-term behavioural change in line with WBC Core Strategy Policy CP6.
- 4.10 Considering the above, the Appeal Site more than fully meets the sustainable transport and accessibility objectives of WBC Core Strategy Policies CP1, CP3 and CP6, as well as MDD Local Plan Policy CC01.

- 4.11 The potential future delivery of LVGV will further enhance this position by introducing a wide range of facilities and services within convenient walking and cycling distances of the Appeal Site. Therefore enhancing the lifetime sustainability of the Appeal Site in line with paragraph 135(a) of the NPPF.
- 4.12 It is therefore beyond doubt that the Appeal Site will not only integrate with existing sustainable infrastructure but actively enhance it, providing future Appeal Site residents with a genuine and meaningful choice of sustainable transport modes.

5. Overall Assessment of Reason for Refusal 4.

- 5.1 The evidence I present to this Appeal specifically focusses on responding to and addressing RfR 4. Within my evidence I demonstrate, contrary to the Councils position, that:
- The Appeal Site is in an extremely sustainable location, with day-to-day facilities and amenities easily accessible by active travel modes (walking and cycling). Additionally the Appeal Site is provided with direct access to a high-frequency, seven-day-a-week, bus service which provides future residents with convenient connections to a wide range of retail, employment, education and leisure destinations, as well as major multi-modal transport hubs at Reading and Wokingham rail stations.
 - By virtue of the wide range of active and sustainable travel options available and the commitment given by the Appellant in regard to the implementation of Travel Plan measures / initiatives, coupled with the significant S106 contributions, physical infrastructure improvements, modal shift towards sustainable transport modes is not only encouraged but, in my expert opinion, it will be realised.
 - A location in the countryside outside settlement limits is not, in itself, a conducive factor in determining the accessibility and sustainability of an Appeal Site.
 - The Appeal Site can deliver '*step change*' improvements to the local walking environment. These will not only enhance the quality and safety of the active travel route to local facilities / amenities for the benefit of future residents within the Appeal Site but will also provide measurable improvements for the residents within the existing local community surrounding the Appeal Site.
 - In regard to impact on highway safety, the Officer's appraisal confirms the response from the Council's Highway Engineer that the trips generated by the development on the Appeal Site will not have detrimental impact on highway safety and that the level of traffic generated will not have an adverse impact on the wider highway network.

6. Council's Additional Issues

Additional Issue 1 - Prejudice to the delivery of LVGV

- 6.1 In regard to Additional Issue 1, my evidence demonstrates that the Appeal Site proposals will only have a negligible effect on the strategic traffic modelling undertaken in the context of the Local Plan Update ("LPU"); as part of the assessment of LVGV.
- 6.2 At the core of the Council's allegation is the inference that the Appeal Site proposals will consume a proportion of a perceived 800 dwelling unit capacity that triggers significant infrastructure works on the surrounding highway network.
- 6.3 In my view, the Council's position, as outlined in Additional Issue 1, is flawed as it does not identify specifically where these impacts are in relation to the Appeal Site proposals. Indeed, the Appellant has requested this specific information and have not received a response from the Council.
- 6.4 In addition, setting a trigger point for infrastructure mitigation based on dwelling units is not a relevant unit of measurement, the trip generation arising from dwelling units and then its distribution on the given highway network and / or through a given critical highway node or link would seem a more sensible benchmark to determine impacts.
- 6.5 My evidence demonstrates that the Appeal Site trip generation, trip distribution and the interaction of development-related traffic with both the local and strategic road network have been comprehensively assessed. These matters were reviewed by the Council and found to be acceptable (CD 02.19). Indeed, the Council made no mention concerning a 800 dwelling unit headroom in that document.
- 6.6 Within my evidence I clearly demonstrate that the any potential impact arising from the Appeal Site would represent a negligible increase in flows on the key links, typically well below 2.0% and often below 1.0%, identified within the Council's modelling.
- 6.7 Further, the Appeal Site would generate a negligible number of additional vehicle trips at key junctions identified from the Council's modelling. These additional vehicular trips represent negligible increases.
- 6.8 My evidence is compelling in demonstrating that the Appeal Site would **not prejudice** the delivery of LVGV, nor would it give rise to unacceptable impacts on highway safety or severe residual cumulative effects on the highway network, consistent with the Council's consultation response (CD 02.19) which stated: "...highways is content that the level of traffic from this proposed development would not have an adverse impact on the wider highway network."

- 6.9 Further, and based on the analysis within my evidence concerning the trip generation and distribution of such trips on the wider highway network, there is no requirement for the Appeal Site to make any further highway capacity improvements.
- 6.10 The highway mitigation that the Council have identified through the LPU / LVGV strategic modelling process is only required, and triggered, by the delivery of LVGV and other LPU identified housing schemes.
- 6.11 The vision-led interventions identified elsewhere within my evidence comprise targeted off-site highway works, active travel enhancements and public transport contributions, that are directly related to the Appeal Site and would provide effective and proportionate mitigation in accordance with paragraphs 115(d) and 116 of the NPPF.
- 6.12 That said, it is my professional judgement that this package of vision-led interventions goes well beyond addressing the matters raised by the Council under their Additional Issue 1, particularly as the trip generation / distribution and impact on the wider network are negligible and would not prejudice the delivery of LVGV.
- 6.13 If the Inspector considers it necessary, this package of vision-led interventions can be included as part of the wider package of measures to be delivered by the Appeal Site so long as the Inspector is content that such measures are necessary and would benefit residents of the Appeal scheme and the locality.
- 6.14 On this basis, I consider that Additional Issue 1 is satisfactorily addressed.

Additional Issue 2 - Access and Visibility

- 6.15 In respect of Additional Issue 2, this has been resolved through ongoing liaison within the Appellant and WBC, as detailed within the Highways SoCG (CD05.05).

7. Third Party Matters

- 7.1 My evidence addresses the representations made by Arborfield & Newland Parish Council ("A&NPC"), Councillor Barley and from members of the public, as set out in the Council Officer's Report (CD 03.02).
- 7.2 In addressing the A&NPC representations, I have demonstrated in evidence that the Appeal Site proposals fully address Policy GA1 of the Arborfield and Barkham Neighbourhood Plan ("A&BNP") (CD 06.03) and that the A&NPC objection is unfounded.

- 7.3 Further, in respect of A&NPC representations on the bus service, I have demonstrated that the Appeal Site proposals fully address Policy GP3 of the A&BNP. Also, my evidence clearly demonstrates that Appellant's commitment to delivery of active travel and public transport infrastructure improvements that will have a direct positive impact on the local community surrounding the Appeal Site.
- 7.4 Not referenced in the A&NPC representations, but as has been demonstrated in my evidence, the surfaced, all-weather connections from the Appeal Site to Reading Road and Church Lane, coupled with upgrades to existing footway infrastructure on Reading Road, including maintenance of existing overgrowth and widening, lighting and upgraded crossing facilities, dropped kerb and tactile paving provision will deliver on all five parts of Policy GA2 of the A&BNP.
- 7.5 In addressing Councillor Barley's representations, my evidence clearly demonstrates that traffic generated by the Appeal Site proposals will have no noticeable impact on the Arborfield Cross traffic calming measures. On Reading Road, traffic flows with the Appeal Site fully occupied and operational will continue to be more than half of those experienced prior to the completion of Observer Way.
- 7.6 In respect of car driver trips, and contrary to the opinion of Councillor Barley, not all trips will pass through Arborfield Cross. Indeed, as has been evidenced, 37% of car driver trips generated by the Appeal Site proposals will not pass through Arborfield Cross.
- 7.7 My evidence also confirms that not all trips to nearby services are reliant on the use of a car. There are a wide range of active travel and good public transport choices available to future residents within the Appeal Site to access nearby services by means other than the car.
- 7.8 My evidence also addresses the suitability of the pavement on Reading Road for disabled persons and children in the context of the proposed active travel improvements between the Appeal Site and Arborfield Cross.

Additional Relevant Appeal Decisions

- 7.9 Within my evidence I explore three relevant, recent Appeal decisions where sustainability and accessibility were key issues, these being:
- APP/X0360/W/24/3342812 - Land between School Road and Orchard Road, Hurst, Reading
 - APP/Q3115/W/15/3136319 - Mount Hill Farm, High Street, Tetworth, Oxfordshire

- APP/Q3115/W/15/3035899 - Land to the east of Newington Road, Stadhampton, Oxfordshire

7.10 My evidence shows that previous Inspectors have accepted residential development in locations with more constrained sustainable transport provision than that available at the current Appeal Site.

7.11 As such and considering the precedent established within the relevant Appeal Decisions, the current Appeal Site demonstrably satisfies the sustainable transport and accessibility objectives of WBC Core Strategy Policies CP1, CP3 and CP6, as well as MDD Local Plan Policy CC01.

8. Conclusions

8.1 Should the Inspector be minded to grant permission, the Appeal Site will deliver a comprehensive package of highways and transport improvement measures that will have a direct and sustained long-term positive impact on the local community through a physical works secured by Conditions and far reaching financial support secured by way of S106.

8.2 The Appeal Site is in an extremely sustainable location, with day-to-day facilities and amenities easily accessible by active travel modes (walking and cycling). Additionally the Appeal Site is provided with direct access to a high-frequency, seven-day-a-week, bus service with convenient connections to a wide range of retail, employment, education and leisure destinations, as well as Reading and Wokingham rail stations.

8.3 By virtue of the wide range of active and sustainable travel options available and the commitment given by the Appellant in regard to the implementation of Travel Plan measures / initiatives, coupled with the significant S106 contributions, physical infrastructure improvements, modal shift towards sustainable transport modes is not only encouraged but, in my expert opinion, it will be realised.

8.4 A location in the countryside outside settlement limits is not, in itself, a conducive factor in determining the accessibility and sustainability of an Appeal Site.

8.5 The Appeal Site can deliver '*step change*' improvements to the local walking environment. These will not only enhance the quality and safety of the active travel route to local facilities / amenities for the benefit of future residents within the Appeal Site as well as residents within the existing local community surrounding the Appeal Site.

- 8.6 The Appeal Site would not prejudice the delivery of LVGV, nor would it give rise to unacceptable impacts on highway safety or severe residual cumulative effects on the highway network in accordance with paragraph 116 of the NPPF.
- 8.7 The package of vision-led mitigation measures, comprising targeted off-site highway works, active travel enhancements and public transport contributions, would provide effective and proportionate mitigation in accordance with paras. 115(d) and 116 of the NPPF.
- 8.8 The agreed access design can achieve the appropriate visibility splays in a safe and convenient manner.

Overall Conclusion

- 8.9 In overall conclusion, the Appeal Site proposals have been shown within my evidence to fully accord with paragraphs 110, 115 and 116 of the Framework, Policies CP1, CP2, CP3, CP6 and CP9 of the WBC Core Strategy, and the Borough Design Guide SPD.
- 8.10 In particular, I believe that the requirements of paragraph 110 of the Framework are met comprehensively in that the Appeal Site is sustainable and offers a genuine choice of transport modes recognising that sustainable transport solutions vary between urban and rural areas.
- 8.11 Further, in respect to paragraph 115 of the Framework, it is demonstrated that the Appeal Site 1) prioritises sustainable transport modes in the context of the vision, the type of development and its location; 2) delivers safe and suitable access for all road users; 3) considers the design of streets, parking areas, and other transport elements in accordance with the National Design Guide and the National Model Design Code, recognising that the material submitted with the Outline Application is illustrative; and 4) presents no significant impacts on the transport network, or on highway safety.
- 8.12 Indeed, in the context of part d) of paragraph 115, I have demonstrated in evidence that the mitigation that supports the Appeal Site proposals is vision-led and prioritises enhancement to the active travel and public transport networks to the benefit of the wider community and to deliver choice to future prospective residents in travel mode when accessing the full range of facilities and services, reducing reliance on the use of the car.
- 8.13 Equally, under the requirements of paragraph 116 of the Framework, it is my expert opinion that the proposed means of access to the Appeal Site will not lead to an unacceptable impact on highway safety and that any residual impact on the wider network as a result of the proposed mitigation, taking into account all reasonable future scenarios, will not be severe.

- 8.14 Based on the evidence provided in this Proof of Evidence, I therefore respectfully request that the Inspector allows this Appeal.