

Cuerden Lancashire

WSP Transport Documentation Review

Client:	Brookhouse Group	Job No:	J3250954
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1.1 Introduction

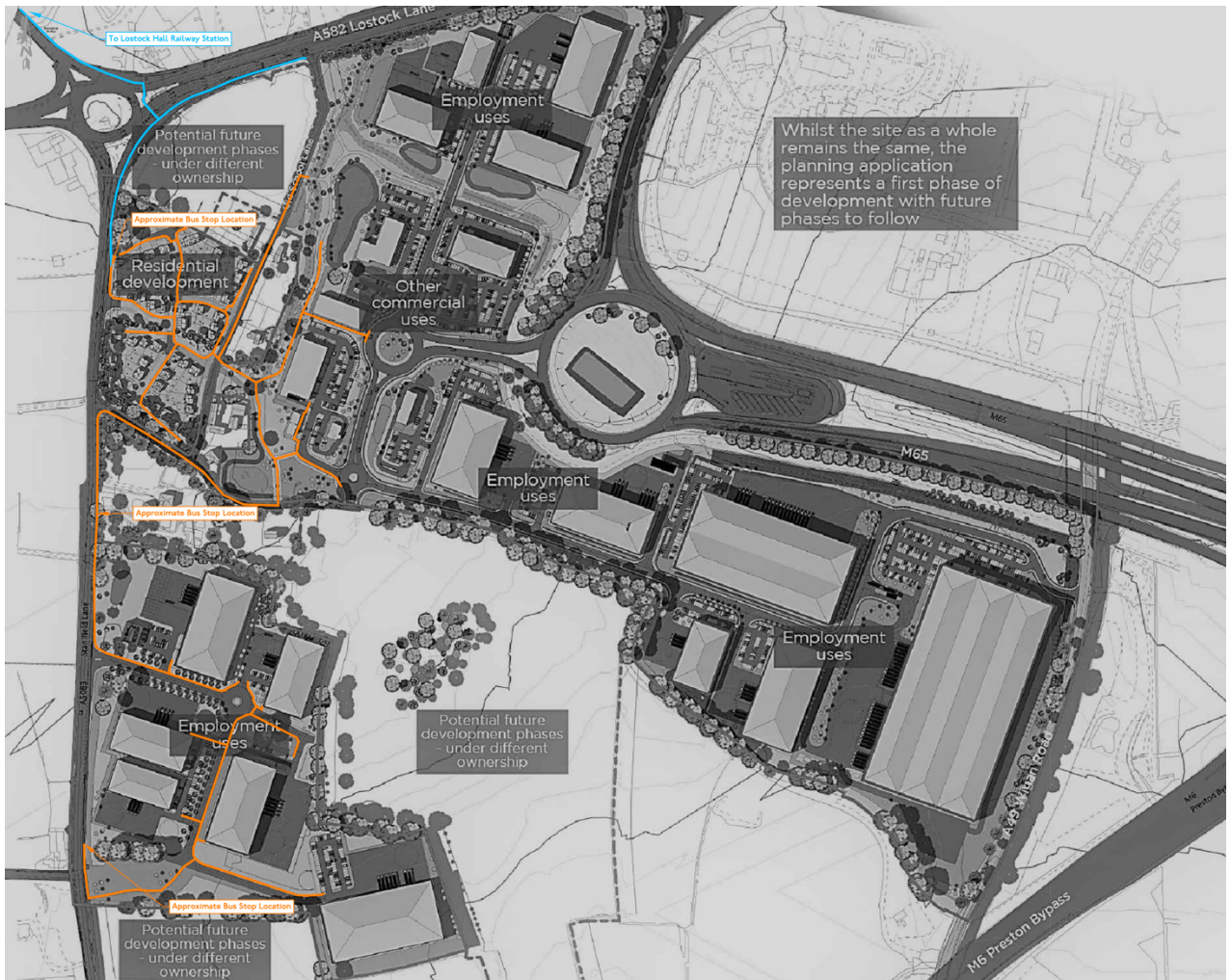
- 1.1.1 This Technical Note (TN) has been prepared by Mode Transport Planning, on behalf of Brookhouse Group, following a review of the Transport Assessment (TA) and subsequent technical notes and documents undertaken by WSP for the Cuerden Strategic Site in Leyland (LCC application reference LCC/07/2022/00044)
- 1.1.2 The sections in this note are set out based on the WSP report format and include commentary on any updates in the relevant sections.

1.2 Existing Conditions

- 1.2.1 Paragraph 2.3.19 provides a description of Old School Lane, however, it fails to mention that the road is only c.2.5m wide, subject to limited forward visibility in places and subject to national speed limit. All of these issues make it unsuitable for use as a pedestrian route.
- 1.2.2 Similarly, Paragraph 2.3.21 provides a description of Stoney Lane, although it fails to mention that the road is only c.2.5m wide and subject to the national speed limit. These are also issues which make it unsuitable for use as a pedestrian route.
- 1.2.3 Figure 2-6 in the WSP TA shows walking isochrones from the centre of the site, however, this is entirely misleading as the isochrones show the inclusion of the link road which is not part of this application. It also assumes that Old School Lane and Stoney Lane are appropriate pedestrian routes which is not correct. On this basis, the only pedestrian link that should be shown is onto the A582 to the north of the site and the A49 to the east of the site, which will vastly reduce the catchment area of the walking isochrones.
- 1.2.4 Paragraph 2.4.5 states *“A582 adjacent to site a footway is present on the northern side of the A582 to the A6 and to retail and leisure facilities east of the A6”* this fails to acknowledge the lack of suitable crossing facilities along the A582, and the large diversion required for pedestrians to use the crossing facilities at the A582 / Stanifield Lane roundabout junction or the proposed crossing to the north of Old School Lane.

- 1.2.5 Paragraphs 2.4.6 and 2.4.7 list a number of Public Rights of Way (PRoW) in the vicinity of the site and note that these will be retained, partially diverted or upgraded as part of the development. It has however not been noted that two of the four PRoW listed are not in land within the applicant's control and this is therefore not possible without third-party land agreements.
- 1.2.6 Figure 2-8 in the WSP report shows cycling isochrones from the centre site. This is however entirely misleading as the isochrones show the inclusion of the link road which is not part of this application.
- 1.2.7 Paragraph 2.5.1 and Table 2-1 provide a summary of the bus services available from Stanifield Lane, but there is no review as to whether the bus stops are within recommended walking distances.
- 1.2.8 Paragraph 2.5.3 and Table 2-2 states that Lostock Hall Railway Station is located 700m to the north of the site and provides a summary of services from the station.
- 1.2.9 [Figure 1.1](#) shows the walking routes within the site which are within 400m of a bus stop and 800m of the railway station.

Figure 1.1 : Walking Routes



1.2.10 The plan shows that only a small area of the residential site is located within 800m of the railway station whilst much of Zone A is not within a suitable walking distance of a bus stop or the railway station.

1.2.11 The few areas within Zone A which are within walking distance of a bus stop are reliant on upgrades to Stoney Lane to provide direct links. As will be set out in more detail within this note, these improvements cannot be delivered to ensure that this area can be deemed to be sustainable development in accordance with the National Planning Policy Framework (NPPF).

1.2.12 Table 2-4 shows the local facilities which primarily includes those which are included in the outline planning application and there is no guarantee that these will be provided. The remaining amenities are subject to at least a 25-minute walk.

1.3 Proposed Development

- 1.3.1 The proposed Stanifield Lane residential access, shown in Drawing 84465-WSP-XX- DR-003, has been co-ordinated with the proposed Lancashire County Cricket Club (LCCC) scheme access location. This requires widening within the LCCC land, which is not included within the Cuerden Strategic Site red line boundary.
- 1.3.2 Paragraph 3.3.1 states *“If the Farington proposals were not build out, the junction layout would be proposed as a three-arm priority junction.”*. However, it has not been demonstrated that this access can be delivered independently of the LCCC scheme and within the red line boundary.
- 1.3.3 Paragraph 3.4.3 states *“Upon completion of full build out a route between the M65 terminus and Stanifield Lane will be available using the internal highway layout”*. This is not the case as the link road is not included in this application and requires third-party land to be delivered.
- 1.3.4 Paragraph 3.5.1 states *“The internal layout of the site will provide suitable pedestrian and cycle routes between the various proposed uses and will enable active travel users to travel across and within the site safely and conveniently. Internal footways will provide access to each of the individual development plots and units, as well as connecting between the development plots”*. This is incorrect, without the link road, Zone D is now a standalone development which is not connected to the remainder of the development and is now beyond walking distance of the proposed amenities.
- 1.3.5 Paragraph 3.6.1 states *“Public transport services are available in close proximity to the site, as highlighted in Chapter 2. At this stage it is not proposed to divert bus services via the site itself, but the flexibility to do this in the future is maintained through highway design which will allow the passage of public buses if required”*. As demonstrated in [Figure 1.1](#) of this note, most of the site is not considered to be within a reasonable walking distance of a bus stop or a railway station. Additionally, without the link road there is no flexibility to allow the passage of buses from Stanifield Lane in the future without the use of third-party land.
- 1.3.6 WSP drawings state *“Route between M65 terminus and Stanifield Lane (via Phase A, future phase and phase D) to be offered for adoption at a future time when future phase of development and through vehicle route is completed”*. Along with the Highways Officer comments noting that the route will not be adopted until completion of the full route, this confirms that the Brookhouse land will be subject to a ransom situation.

1.4 Policy Review

- 1.4.1 Paragraph 4.2.1 states *“The latest version of the National Planning Policy Framework (NPPF) was published in July 2021. The Framework identifies that the purpose of the planning system is to contribute towards sustainable development. It maintains that plans and decisions should apply a presumption in favour of sustainable development”*. It has been demonstrated that this is not considered to be a sustainable development.
- 1.4.2 Paragraph 4.2.6 states *“Chapter 3 outlines the site access proposals, which have been designed to provide safe and suitable access to all users”*. It has not been demonstrated that the residential access can be delivered within the red line boundary. Pedestrian access is only available on to the A582 to the north and A49 to the east for Zone A. There are no proposals to improve cycle access to the site.
- 1.4.3 When referencing the DfT Circular 02/2013 in the WSP TA paragraph 4.2.11 states *“paragraph 26 states that ‘The Highways Agency expects the promoters of development to put forward initiatives that manage down the traffic impact of proposals to support the promotion of sustainable transport and the development of accessible sites’”*. It has been demonstrated that the site is not accessible and therefore it does not conform with this policy.
- 1.4.4 When referring to the Lancashire County Council (LCC) Local Transport Plan (2011-2021) the WSP TA states *“The development proposals will provide a local leisure facility, accessible via existing walking and cycling infrastructure, and via sustainable transport modes. The proposed development can be delivered in accordance with the aims and objectives outlined in the Local Transport Plan”*. It has been demonstrated that the site is not sustainable and therefore it does not conform with this policy.
- 1.4.5 When referring to the Central Lancashire Core Strategy (2012) the WSP TA states *“The proposals will promote sustainable modes to travel to and from the site and will bring a new sport and recreation facility that will welcome and encourage community uses”*. It has been demonstrated that the site is not accessible by sustainable modes and there are no proposals to promote sustainable modes therefore it does not conform with this policy.
- 1.4.6 When referring to the South Ribble Council (SRBC) Local Plan (2015) the WSP TA states *“It is clear from Policy C4, that development of the site is supported within the Local plan, and that infrastructure plays a critical part in the development. This TA outlines the proposed Masterplan for the site which includes employment opportunities as well as supporting land uses”*. This policy requires the “comprehensive development of the site” which is not achieved as part of these proposals as a large area of the strategic site has been removed from the planning application and ransom strips have been included which could prevent the delivery of the allocated site.
- 1.4.7 The inclusion of ransom strips is also something that should not be acceptable within any allocated development site as a matter of principle.

- 1.4.8 Furthermore, the policy states that planning permission will be agreed subject to “*an agreed masterplan*”, this cannot be met as the application has been submitted to LCC and will not be approved by SRBC.
- 1.4.9 It can therefore be concluded that the proposals are not compliant with this policy.
- 1.4.10 Paragraph 4.5.1 states “*In summary, the proposed development is located in a sustainable and accessible location and accords with the principles of national, regional and local planning policy*”. It has been demonstrated that the site is not in a sustainable and accessible location and therefore the proposals do not conform with national, regional or local planning policy.

1.5 Trip Distribution and Generation

- 1.5.1 New trip rates have been used, including for the B2/B8 Uses, which are lower than the original trip rates in the Mott MacDonald (MM) TA (dated 20th January 2017), prepared for the previous (IKEA) application (SRBC reference 07/2017/0211/ORM).
- 1.5.2 WSP have sought to show a reduction in trips across the peak hours due to the loss of the retail element; however, much of the reduction is down to the change in trip rates which has not been justified. [Table 1.1](#) provides a summary of the AM and PM peak hour trips for the current proposed scheme based on WSP’s new trip rates and the original trip rates which were approved by LCC Highways.

Table 1.1 : Trip Generation Comparison – WSP Trip Rates vs Approved MM Trip Rates

Land Use	AM Peak Hour			PM Peak Hour		
	Arrive	Depart	Total	Arrive	Depart	Total
Proposed as per WSP TA	941	371	1312	569	942	1512
Approved MM Trip Rates	1103	587	1699	725	1095	1822
Difference	+162	+216	+387	+156	+153	+310

- 1.5.3 It is evident that WSP have sought to reduce the development impact from changing the previously approved trip rates, rather than just remove the trips associated with the large retail unit.
- 1.5.4 If the approved employment trip rates were applied to the current development proposals, the AM peak hour trip generation would be higher than that generated by the approved development scheme. The PM peak trip generation would be lower, based on the removal of the large retail unit. A trip generation comparison is shown in [Table 1.2](#).

Table 1.2 : Trip Generation Comparison – Approved Development vs Current Scheme using Approved Trip Rates

Land Use	AM Peak Hour			PM Peak Hour		
	Arrive	Depart	Total	Arrive	Depart	Total
Previously Approved MM TA	1094	397	1491	731	1267	1998
Proposed Scheme using Approved Trip Rates	1103	587	1699	725	1095	1822
Difference	+9	+190	+208	-6	-172	-176

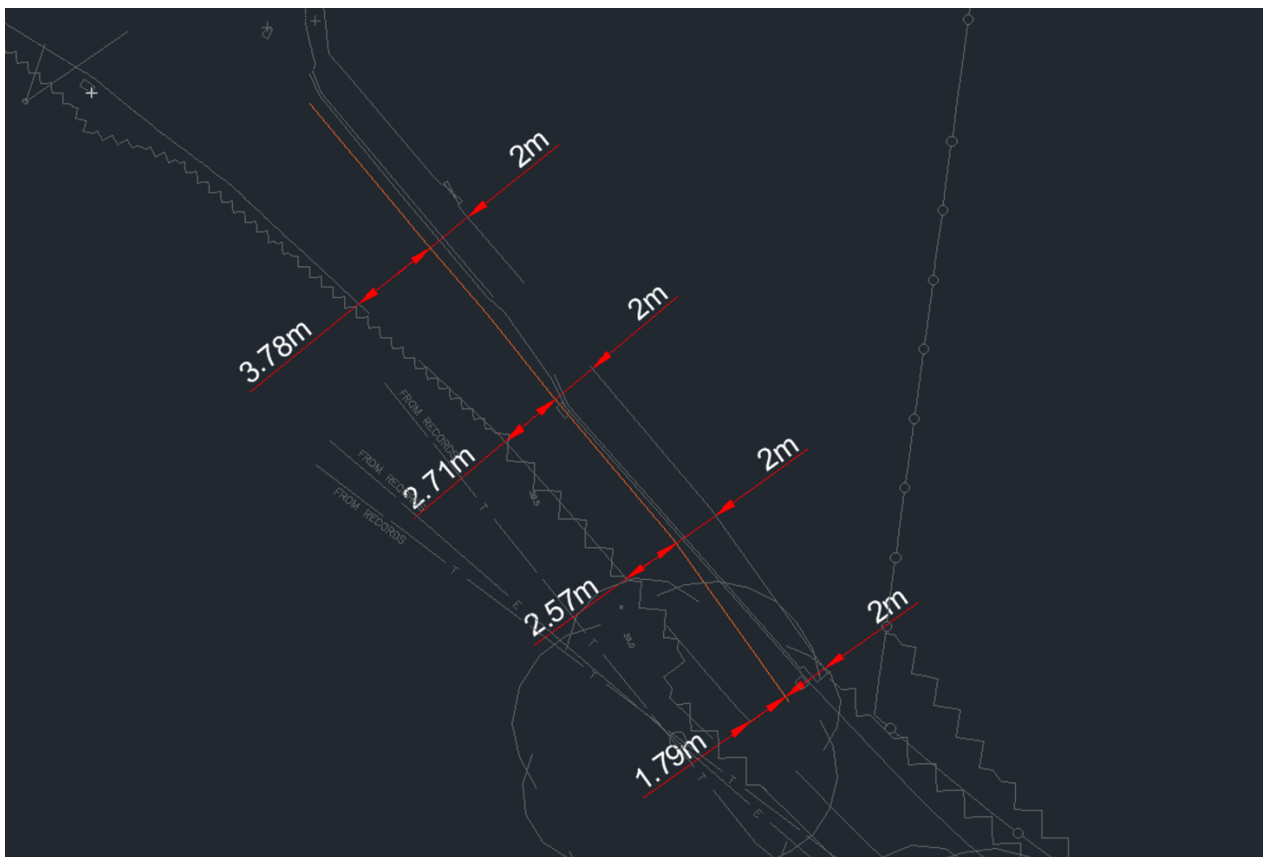
- 1.5.5 As demonstrated in [Table 1.2](#), if the approved employment trip rates were applied by WSP in their TA, the current proposed development scheme would generate higher AM peak hour trips on the road network; therefore, the conclusion by WSP that there is a reduced impact from the proposed development scheme is incorrect.
- 1.5.6 Furthermore, Zone D employment trips continue to benefit from a 10% reduction in linked trips to the retail and leisure elements of the site. This is despite the fact there is no vehicular or pedestrian connection between these areas of the site and the trips would need to route via the local highway network.
- 1.5.7 The proposed LCCC facility has been included as a committed development, although the trip generation for this, which was also undertaken by WSP, is disputed.
- 1.5.8 As part of the modelling assumptions in the updated Highways Assessment documents uploaded 27th July, WSP have included two rerouting assumptions which reroute traffic through the site from the Wigan Road site access junction. A connection between Zone A and Zone B is not provided as part of the detailed planning application therefore a suitable condition will be required to prevent any development being occupied before the connection is provided.
- 1.5.9 A rerouting assumption has been made that 33% of traffic travelling between the M65 and Stanifield Lane will route via Lydiate Lane and through the Wigan Road site entrance, despite the diversion route being 1km longer than the existing route. Mode would dispute whether this is a reasonable assumption.
- 1.5.10 The Stanifield Lane / Lydiate Lane and Lydiate Lane / Wigan Lane junctions were modelled in the original WSP TA but have not been reassessed with the recent increase in diverted flows. The TA notes that the Stanifield Lane / Lydiate Lane junction is already operating over capacity so further modelling and clarification is required as to whether mitigation is required to support the diverted flows.

1.6 Active Travel and Sustainable Transport

- 1.6.1 Paragraph 6.1.1 states *“As set out in Chapter 2 of the TA, the Site is well located for sustainable travel to a number of local destinations using either active travel modes or public transport. The development will enhance these opportunities further, in particular through the provision of a high-quality foot and cycle network within the site and key connections off the Site”*. In its current form the site is not well located to support sustainable travel without the diversion of bus routes into the site although it has the potential to be well located to support sustainable travel if development was undertaken comprehensively.
- 1.6.2 Paragraph 6.2.1 states *“The existing pedestrian and cycling infrastructure surrounding the Site and the local area can facilitate active travel trips to/from the site. Walking and cycling isochrones provided in Figures 2-6 and 2-8 show local areas within a 25-minute walk or 20-minute cycle of the site”*. Pedestrian and cycle connections into the site are limited from the existing infrastructure surrounding the site. The isochrones are based on non-existent or unsuitable infrastructure.
- 1.6.3 Paragraph 6.2.2 states *“The internal layout of the site will provide suitable pedestrian and cycle routes between the various proposed uses and will enable active travel users to travel across and within the site safely and conveniently. Internal footways will provide access to each of the individual development plots and units, as well as connecting between the development plots”*. Zone D is a standalone development plot which does not connect to the rest of the development.
- 1.6.4 Cycle access from Zone A to the south is now exclusively via Stanifield Lane without the link road, but no improvements above the previous proposals are included. This also now includes cyclists turning at the priority junction with Stoney Lane rather than the proposed signal junction arrangement which is considered to be less safe.
- 1.6.5 Paragraph 6.4.2 states *“at this stage it is not proposed to divert bus services via the site itself, but the flexibility to do this in the future is maintained through highway design which will allow the passage of public buses if required”*. It has been demonstrated that most of the site is not considered to be sustainable without the diversion of bus routes into the site. There is no flexibility to divert bus services in the future based on the proposals in their current form and any future improvements would require third-party land although it has the potential to be well located to support sustainable travel if development was undertaken comprehensively.
- 1.6.6 Paragraph 6.4.3 states *“The site is within walking and cycling distance of local rail stations, Leyland and Lostock Hall. Sustainable journeys to and from the site can make use of the existing rail services from these stations”*. Only a small section of the residential site is within walking distance of Lostock Hall Railway Station whilst none of the site is within walking distance of Leyland Railway Station.

- 1.6.7 WSP drawing 84465-WSP-XX-DR-018 shows the introduction of a 2m footway along Stoney Lane to improve connectivity between the development and bus stops on Stanifield Lane. A connection is required to deliver a scheme which can be deemed accessible by sustainable modes of travel, and which therefore accords with the NPPF.
- 1.6.8 Alongside Elmar House there are sections of adopted verge which are only 1m wide where the carriageway is only 3m wide. The introduction of a 2m footway in this area could result in a remaining carriageway width of less than 2m.
- 1.6.9 WSP's plan has been drawn on OS mapping rather than the topographical survey which appears to show a wider verge to the north than is actually available.
- 1.6.10 In order to check the actual available carriageway widths if a 2m wide footway is introduced, topographical survey and land registry mapping along Stoney Lane has been used to take measurements. The results are shown in [Figure 1.2](#).

Figure 1.2 : Stoney Lane Dimensions (based on Topographical Survey)



- 1.6.11 As can be seen in [Figure 1.2](#), the introduction of a 2m wide footway on Stoney Lane would result in inadequate carriageway widths (less than 2m at points) on Stoney Lane. This will result in the existing vehicular access rights being removed to the existing properties on Stoney Lane, the approved residential development for 9no. dwellings (app no. 07/2022/00886/OUT) and the Brookhouse land.

1.6.12 Without a formal commitment to construct a suitable alternative footway, the means for pedestrians accessing the main area of the site and moving around the site, in particular between the two parcels of land owned by Lancashire County Council, is lost, meaning that this strategic site is effectively severed, and not sustainable.

1.7 Traffic Capacity Assessments

1.7.1 Paragraph 7.4.2 states *“As outlined in Chapter 5, the proposed scheme generates less vehicle trips than the consented scheme, therefore provision of the same scale of mitigation as previously proposed is considered as more than appropriate for the revised development”*. This is contested, as the reduction in trips is based solely on the change to the trip rates; therefore, the mitigation measures may not be sufficient to accommodate the proposed development.

1.7.2 All Modelling in Chapter 7 of the WSP TA compares the proposed scheme with the MM junction modelling, which does not include the previously consented link road through the site between the M65 Terminus and Stanifield Lane. Without the inclusion of this key link road, which has been removed in the proposed development scheme, it is not a direct comparison with what was previously consented and the increase in traffic on the A582 may result in the mitigation schemes not being sufficient.

1.7.3 **Table 1.3** shows the number of trips which would have been diverted off the A582 corridor as a result of the introduction of the link road in the consented scheme, which have not been considered in the Base + Committed Scenario in the WSP TA.

Table 1.3 : Link Road Diverted Trips

Movement	AM Peak	PM Peak
East to West Trips	263	264
West to East Trips	240	230
Two-way trips	503	494
Percentage impact on A582 Eastbound 2024 base flows	10.5%	9.8%
Percentage impact on A582 Westbound 2024 base flows	9.1%	10.2%

1.7.4 The Stanifield Lane / A582 junction mitigation scheme and the A582 / A6 junction mitigation scheme improve the operation of the junctions; however, the improvement scheme will not be as effective at reducing the development traffic impact as the consented scheme due to the loss of the link road which diverted traffic through the site.

1.7.5 It is unclear if WSP have included the committed mitigation schemes as part of the DM modelling or if they have just included the committed flows from the previous application.

- 1.7.6 The consented scheme has been included as a committed development (although this is without considering the benefits of the link road through the site) in the do minimum modelling. This therefore reduces the difference between the do minimum and do something scenario, along with reducing the mitigation measures required from the development to ensure that there is no impact as a result of the development despite the applications being on the same site.
- 1.7.7 NH have noted in their consultation response that there is not a suitable do minimum modelling scenario.
- 1.7.8 Furthermore, it is understood that the existing planning consent has expired prior to LCC determining the application, and therefore this should not be included as a permitted development.
- 1.7.9 **Table 1.4** shows the maximum degree of saturation across all lanes for the A582 / A6 signalised roundabout junction in the PM peak, as this is the only comparable data available across all scenarios from the MM TA.

Table 1.4 : Modelling Comparison

Scenario	PM Peak
A582 / A6 Junction	
MM 2024 Base + Committed	99%
MM2024 Base + Committed + Development (without mitigation)	102%
MM 2024 Base + Committed + Development (with mitigation & without link road)	101.6%
MM 2024 Base + Committed + Development (with mitigation & link road)	91.4%

- 1.7.10 **Table 1.4** shows that the MM TA analysis demonstrated that the proposed junction mitigation measures alone were not sufficient to mitigate the development impact on the local highway network, without the introduction of the link road through the site.
- 1.7.11 The residential site access junction has not been assessed as a standalone junction without the proposed LCCC site access.
- 1.7.12 Queuing Assessments from the VISSIM modelling, as presented in the '*Lancashire Central VISSIM Assessment Note*' dated 24th July 2023, show an excessive increase in queuing at the Stanifield Lane / A582 roundabout, where average queues on several arms are forecast to extend for up to 400m (1/4 mile) in the 2037 scenario.
- 1.7.13 In addition, the modelling scenarios within the '*Lancashire Central VISSIM Assessment Note*' do not include separate base and with development scenarios, as such it is not possible to ascertain / review the full impact of the development.

- 1.7.14 The modelling note '70084465 - Lancashire Central – Modelling Note' dated 25th July 2025 ' does not include any assessment of capacity in the text and all of the required outputs are not attached in the appendix.
- 1.7.15 The models have been calibrated based on queue lengths, whilst validating and calibrating models to queue lengths can be useful, JCT state within the LinSig use manual that: *“Due to the variability of queues and sensitivity to small changes in conditions both in models and in reality we recommend avoiding directly calibrating models to measured queues as unless done with extreme care and highly detailed data it has the potential for introducing significant inaccuracy into the model. It is recommended that a greater emphasis is placed on ensuring capacities are modelled correctly whilst still checking that modelled queues are acceptable”*. Models that have been amended based on queuing should not be used to assess mitigation schemes.
- 1.7.16 Furthermore, some of the available modelling results in the appendices show junctions operating over capacity in the 2037 with development scenario.
- 1.7.17 The 2037 future year assessment fails to provide any indication of how the site will be built out and any intermediate phases where development could be occupied prior to the delivery of all infrastructure improvements.
- 1.7.18 NH have highlighted in their comments that there were a number of issues with the VISSIM model and in order to understand the impact of the development on their network they were required to undertake their own modelling.
- 1.7.19 WSP have not provided updated VISSIM modelling which address all of the issue raised by NH.
- 1.7.20 The comments tracked uploaded by NH has shown that there were a number of issues with the modelling that was undertaken. The comments suggest that changes to the modelling was undertaken after the submission of the latest modelling results and no further updated modelling has been uploaded to the planning portal which reflects these changes.
- 1.7.21 In their Highways comments LCC reference updated modelling notes dated 11th August, these are not available on the planning portal.

1.8 WSP Summary

- 1.8.1 Paragraph 8.1.3 states *“The development proposals accord with the national, regional and local transport policy of promoting sustainable development and facilitating means of travel by sustainable modes”*. It has been demonstrated in this response that the site is not considered to be accessible by sustainable modes of travel and therefore does not comply with national, regional or local policy although it has the potential to be well located to support sustainable travel if development was undertaken comprehensively.

- 1.8.2 Paragraph 8.1.4 states *“The site is proposed to be accessed via four vehicle access junctions including the revision of the existing M65 terminus roundabout, a signalised junction off Wigan Road, a signalised junction off Stanifield Lane and a priority junction providing access to a residential parcel off Stanifield Lane”*. WSP have failed to demonstrate that the access to the residential land can be delivered independently and within the proposed red line boundary.
- 1.8.3 Paragraph 8.1.6 states *“A trip generation exercise has been undertaken, comparing the trip generation associated with the proposed land uses and overall masterplan to the trip generation of the consented scheme. The results show that the proposed development generates fewer two-way vehicle trips than the consented scheme within the peak hour periods”*. The trip generation exercise has been contrived to show a reduction in trips from the previous scheme through the use of lower trip rates, not from the change to the proposed level of development.
- 1.8.4 Paragraph 8.1.7 states *“Junction capacity modelling and microsimulation modelling have also been undertaken to assess the impact of the proposed development on the local highway network and compare the impact of the proposed development to the impact of the consented development. The results show that overall, the proposed development will have a reduced impact on the local highway network compared to the consented scheme”*. The junction capacity modelling has been based on the unsound trip generation assessment and an incorrect base scenario which makes no account for the previously approved link road.
- 1.8.5 Paragraph 8.1.8 states *“Overall, the impact of the proposed development on the local highway network is less than the previously consented development on the site”*. This is based on a disputed assessment and cannot be concluded based on the modelling scenarios which were undertaken.
- 1.8.6 Paragraph 8.1.10 states *“As a result of the above assessment and conclusions, it has been demonstrated that the residual cumulative impacts of development are not severe and there are no overriding reasons to preclude LCC from recognising that the proposals are acceptable in transport terms”*. The impact of the development cannot be concluded based on the modelling scenarios which were undertaken.

1.9 Conclusion

- 1.9.1 WSP have failed to demonstrate that the entire site is accessible by sustainable modes, nor have they proposed suitable improvements to the accessibility of the site.
- 1.9.2 The proposed footway improvements on Stoney Lane will remove the existing vehicular access to the Brookhouse Land.
- 1.9.3 Zone D has become an independent development site and does not benefit from the proposed amenities within Zone A making the area more reliant on vehicular access.

- 1.9.4 WSP have failed to demonstrate that access can safely be delivered to the residential plot of land for a standalone junction within the red line boundary.
- 1.9.5 WSP have included data within their TA which does not reflect the proposed scheme, including infrastructure improvements based on the previous scheme and isochrones based on infrastructure that is not proposed.
- 1.9.6 The inclusion of ransom strips to the future development phase prevents comprehensive development of the allocated site. Submission of the application to LCC rather than SRBC prevents the masterplan for the allocated site from being agreed. These points are contrary to Policy C4 of the SRBC Local Plan 2015.
- 1.9.7 WSP have contrived to show a reduction in trips from the approved application through the use of lower trip rates rather than the change to development quantum.
- 1.9.8 The DM modelling scenarios fail to consider the approved link road and associated reduction in traffic on the A582 resulting in an incorrect comparison with the DS scenario. Therefore, based on the modelling undertaken it cannot be concluded as to whether the impact of the development is severe and therefore in accordance with the NPPF.
- 1.9.9 In summary WSP have failed to demonstrate that the entire site is accessible by sustainable modes, that the site can be accessed safely or that the impact of the development is not severe.
- 1.9.10 Therefore, the development proposals fail to conform with Paragraphs 110, 111 and 112 of the NPPF.