



Town and Country Planning Act 1990 - Section 77
Town and Country Planning (Inquiries Procedure) (England) Rules
2000

Proof of Evidence – Transport Matters

Site:	Anglia Square including land and buildings to the north and west
Applicant:	Weston Homes PLC and Columbia Threadneedle Investments
Local Planning Authority:	Norwich City Council
Name of witness:	Bruce Bentley BSc BTP
PINS reference:	APP/G2625/V/19/3225505
LPA reference:	18/00330/F
Reference:	NCC3/1

Norwich City Council
City Hall
St Peter's Street
Norwich City Council NR2 1NH

1 INTRODUCTION

1.1 My name is Bruce Bentley and I hold a degree in Environmental Sciences from the University of East Anglia and a degree in Town Planning from South Bank Polytechnic (now London South Bank University). I have been employed in the planning field since 1982 and have seventeen years' experience in Development Management and twenty years specialising in transport related planning. This latter work has covered not only the assessment of development proposals but also the implementation of transport schemes throughout the City and the development and adoption of transport policies and plans both in development management and the wider transport fields. I have been employed as the Principal Planner (transportation) at Norwich City Council since 2008.

1.2 I have been involved with various proposals for the Anglia Square area for many years from a transportation perspective, including the proposals from 2009 that David Parkin has detailed and the proposals currently under consideration. So far as the current proposals are concerned I have considered all aspects of the scheme from a transportation perspective, but have deferred to Norfolk County Council for the assessment of the proposals on the Strategic Road network as that (under the current agency agreement¹) is within their jurisdiction. I was, however, involved in the assessment of the planning application from all other transportation perspectives and was involved in the preparation of the report to the Planning Committee.

Scope of evidence

- (a) Policy Context
- (b) Site and surrounding
- (c) Scheme description
- (d) Compliance with Policy

¹ Norwich City Council currently has an Agency Agreement with Norfolk County Council (which ends in March 2019) and delegates all transport matters to the City with the exception of issue relating to the strategic highways network.

- Sustainability and Layout
 - Public off-street car parking
 - Parking and servicing
 - Traffic Impact
- (e) Objections
- (f) Conclusion

2 POLICY CONTEXT

- 2.1 Policy 6 of the Joint Core Strategy (Access and transportation) is primarily relevant to this site as it requires the concentration of development close to essential services and facilities to encourage walking and cycling as the primary means of transport and provides for the implementation of the Norwich Area Transportation Strategy (NATS)(the overall transport policy in the Norwich Policy Area (which includes part of Broadland and South Norfolk District Council areas as well as all of the City of Norwich)) adopted by Norfolk County Council in 2006 (CD11.30). Most of the development management policies relevant to this site in transport terms expand on the requirements of NATS in so far as they relate to development proposals within the Norwich policy area.
- 2.2 In particular Policy DM28 (Encouraging sustainable travel), DM29 (City Centre public off-street parking), Policy DM30 (Access and Highway Safety), DM31 (Car parking and Servicing) and DM32 (Car free and Low Car Housing) are relevant to the Anglia Square development proposals and will be discussed later.
- 2.3 Other NATS policies that relate to the implementation of strategic infrastructure are primarily delivered by Norfolk County Council under the 'Transport for Norwich' banner.

- 2.4 Policy DM28 amplifies the NATS policies providing for and encouraging the use of more sustainable modes of transport (walking, cycling and public transport in particular) where they relate to development management. Local Plan policy DM29 is specific about the level of parking that will be the maximum permissible (10,000 public parking spaces) and also details the manner in which these should be consolidated to provide improved quality of provision as required by the NPPF. This expands on the requirements of NATS policy 23 that seeks no overall increase in the level of City Centre public parking.

3 THE SITE AND SURROUNDINGS

- 3.1 The site is in a highly accessible and sustainable location from a transport perspective, and is probably the most sustainably located available development site in Norfolk at the current time both as a destination and a place to live. There is a substantial walk-in catchment; with densely developed suburbs immediately to the north and all walking routes have formal pedestrian crossing facilities across the more major roads. Whilst Anglia Square itself will continue to fulfil its function as a major district centre, the site is within easy walking distance of the main City Centre, which provides a wealth of services and employment opportunities.
- 3.2 The site also has excellent accessibility by cycle. It is located on the Yellow Pedalway route, and the Blue Pedalway runs adjacent to the site along Magdalen Street (See plan in Appendix 1). Both these routes have seen substantial investment and improvement over the past few years through City Cycling Ambition Grant funding schemes. The Yellow Pedalway is largely traffic free between the site and the City Centre (where it meets all the other radial Pedalways) as a result of the closure of St Georges Street to through traffic and a substantial townscape improvement and an at-grade crossing across St Crispins Road to the south that has recently been completed providing direct access to the site. Investment in the cycle network is ongoing, but the site is easily accessible by cycle to most of the urban area and the major employment areas at Broadland Business Park and the research park.

- 3.3 Local Transport note 1/04 (CD11.31) advises (in para. 3.10.3) that there are limits to the distances generally considered acceptable for utility walking and cycling. The mean average length for walking journeys is approximately 1 km (0.6 miles) and for cycling, it is 4km (2.4 miles) although journeys of up to three times these distances are not uncommon for regular commuters. Analysis of walking and cycling trips in Norwich undertaken between January and March 2019 has shown that walking trips (at an average of 1.81km) and cycle trips (at an average of 6.11 km) in the City significantly exceed the distances advised in LTN 1/04. I have provided a plan (In appendix 2) that shows the catchments areas of Anglia Square for reference purposes within the distances specified in LTN 1/04 which shows that much of the built up area is easily accessible on foot or by bike.
- 3.4 Access to and from public transport is also excellent. All bus services to and from the northern suburbs of the City (and some County services) stop adjacent to the site on Magdalen Street, and many of these are through services to other parts of the City as well (Service routes and timetables for the adjacent stops are included as Appendix 3). Changing in the City Centre provides access to all City and County services. Park and Ride services from Sprowston, the Airport Harford and Thickthorn also stop adjacent to Anglia Square. The railway station is about a mile from the site within easy cycling distance and a reasonable walk and there is a direct bus service there too. Norwich has mainline rail services to London, Cambridge and Liverpool and local services to Lowestoft, Gt Yarmouth and the north Norfolk coast.
- 3.5 The site also benefits from good access by vehicle to the main road network within the City easing access for servicing and by car. Edward Street, New Botolph Street and St Augustine's Street form the recently constructed gyratory system (originally designed to support the 2009 proposals for the redevelopment of Anglia Square) which provides access to the major radial routes to the north and the inner ring road to the South.

4 DESCRIPTION OF SCHEME

- 4.1 The proposed redevelopment enhances the accessibility of the site and the surrounding area and also provides the opportunity to improve the quality of bus provision and car parking.

- 4.2 The pedestrian environment around the periphery of the site is improved on all main frontages. On Magdalen Street the existing footway width is increased by setting back the development frontage where this currently results in a narrow pavement, and Edward Street would be substantially improved, both in terms of footway provision and the overall pedestrian environment (Edward Street is currently a particularly bleak and uninviting street). Continuing around the site, the overall environment adjacent to New Botolph Street and Pitt Street will also be enhanced with a widened footway/cycleway and substantial street planting improving an area currently dominated by heavy traffic and this continues along St Crispins Road. These improvements are described in section 7.5 of the Transport Assessment (TA) (CD4.86 ES Volume 3 (h)).

- 4.3 Within the development, two routes, one, north-south and one effectively east-west link the development to the surrounding streets via two squares that are to be created within the site. This whole area (although it will remain privately owned and controlled) will effectively operate in a similar manner to most of the pedestrianised streets in the city centre, largely free of traffic except for timed servicing arrangements to the adjacent premises. To minimise vehicle intrusion, service bays are to be provided on street on the periphery of the site for deliveries and pick-ups during periods when access is restricted. All routes and squares within the development will be available for cyclists to use. The new St George's Street (the north-south route) is intended to form part of the designated route of the Yellow Pedalway, connecting to the existing shared use facility on Edward Street (Appendix B CD7.81SEI(r)). The proposal includes the widening of this route to the Esdelle Street junction. A shared pedestrian and cycle route is also proposed on Pitt Street. This would offer cyclists a choice and an alternative route to new St Georges Street at times when that route may be busy with pedestrians. I will discuss the overall approach to the design these spaces later.
- 4.4 The provision for public transport adjacent to the site is principally on Magdalen Street (although there are 8 bus stops within an eight minute walk of the site). Improvements to bus stop provision have been included in the proposals (these are shown in Appendix K of the submitted TA, but in addition, substantial improvements to Magdalen Street, including a significant upgrade to the bus stop facilities, a mobility hub and townscape and footway improvements along the entire length of Magdalen Street are being sought through the department for Transport's Transforming Cities initiative. These will be delivered as part of the Transport for Norwich measures.

- 4.5 Non-residential parking for the scheme is proposed in a multi-storey car park accessed off Edward Street to the north of the site, and there are further additional spaces for some of the residential units within this car park as well. Two further residential car parks (accessed off Pitt Street and St Crispins Road) service other blocks in the development. Service yards are proposed to both the north and south of the site whilst some of the internal commercial units will be serviced from the pedestrian streets within the scheme on a time restricted basis.
- 4.6 Residential parking is located primarily in the proposed multi-storey car park and in two other resident-only car parks within the main blocks. There is a small amount of surface parking associated with redevelopment of the site to the north of Edward Street.

5 COMPLIANCE WITH POLICY

Sustainability and layout

- 5.1 Policy DM28 is the main policy that details the requirements for encouraging sustainable travel. Across the urban area, the policy objective is to cater for increasing demand to travel by modes other than the private car (Policy 8 of NATS is the main strategic policy that supports this approach).
- 5.2 The site is highly accessible by all modes of transport as I have already described. Also, the improvements to the site's permeability which create enhanced routes to and through the site integrate the development within the surrounding area, completing the strategic north-south cycle route and providing an alternative for use when the area is busy. Access to public transport is improved as are existing cycle routes in the vicinity of the site, building on recent improvements.

5.3 There is significant provision for the car club and this is appropriately located on a trafficked street at the edge of the development (details are in Appendix R of the TA). Providing these spaces elsewhere on the site would either result in unnecessary vehicle movements into the site or the location of the cars within the various multi-storey car parks. This would make the cars both less convenient and less accessible to users, particularly those who live in locations around the development rather than within it. Car Club cars need to be both visible and easily accessible to all users and the 'on-street' location proposed is the most appropriate. Car club cars will be available to all members, not just those within the development itself and providing groups of cars around a neighbourhood is a better solution from an accessibility perspective than a single location with a substantial number of vehicles. It is likely, therefore, that as demand for the car club grows, rather than placing more vehicles on Edward Street, new on-street locations around the neighbourhood will be needed. Car Clubs have a substantial impact on the ownership of private cars. Surveys by CoMoUK (<https://como.org.uk/wp-content/uploads/2019/06/EW-report-v4.0.pdf>) show a reduction in private car ownership of car club members of over 6 vehicles per car club car provided. There is an additional benefit that many people join the car club instead of buying a car. Norfolk Car Club has estimated that the overall benefit of a car club car is a reduction in private car ownership of around 15 cars per car club car provided.

5.4 The approach to the design of the new external spaces within the development needs to take account of the nature of the area through which it passes and in my opinion, the approach that the developer has taken is the correct one. The development is intended to be a substantial destination in its own right and the routes and squares within it will have a significant sense of place and be dominated by pedestrian movement, accessing the various adjacent businesses and apartments. The routes and squares are very significant spaces of substantial width and this can easily be assessed by comparing them with the adjacent existing streets and roads around the site. For example, the main north-south route is consistent in width with St Crispins Road, whilst the east-east one is similar to Magdalen Street and both of these have very high levels of traffic movement. The squares themselves are substantially larger). There is consequently more than adequate space to allow for a multiplicity of different activities, which is exactly what is required in a thriving centre. The design proposed is effectively a 'pedestrian zone' similar in nature to many of the commercial streets within the heart of the City. This approach takes full account of the advice in Manual for Streets 2 (MfS2)² (CD11.29) which advises that Town and City centres (and in my opinion, this development as a major district centre has the characteristics of a town centre in transport terms) should be the most walkable part of the network accommodating public transport, cycle routes and cycle parking.

² MfS2 – para. 2.3.6

- 5.5 MfS2 also refers to TRL research ³ which suggests that within pedestrianised areas, most pedestrians and cyclists prefer a defined route, and this has been achieved within the landscape design on the more linear areas within the scheme. This is similar to the approach in many of the pedestrianised areas in the rest of the City Centre where notional service/cycle route and pedestrian margins form part of the overall design. However, MfS2 also advises caution ⁴with this approach as it can lead to higher cycle speeds and conflict with pedestrians. This could be a particular issue within the squares proposed within the development, where both pedestrians and cyclists are likely to be moving in a multitude of directions and congregating within the spaces. It is, therefore, essential to minimise the potential for conflict within these areas and not defining a route within the squares is entirely appropriate.
- 5.6 Should the public spaces be particularly busy, then the alternative route along Pitt Street will also be available for use. In earlier proposals (the 2009 scheme and its revisions) this was to be the sole cycle route, with cycling not permitted within the site itself.

Public off-street car parking

- 5.7 Policy DM29 is the main policy that details the requirements for public off-street parking within the City Centre. The overall strategy is to maintain existing level of public off-street car parking (Policy 32 of NATS is the main strategic policy that supports this approach). Policy DM29 elaborates on the main NATS policy by seeking a redistribution of available parking, focussing more on the main City Centre and less on more peripheral locations such as Anglia Square. There is an overall limit of 10,000 public off street parking spaces permitted in the City Centre.

³ MfS2 para. 2.3.13

⁴ MfS2 para. 2.3.13

- 5.8 At the time the current policy was proceeding to adoption there were 730 parking spaces within the multi-storey car park on the site and approximately 500 further surface spaces servicing the existing Anglia Square development. The policy was therefore adopted within the context of there being approximately 1230 public parking spaces on the Anglia Square site. The new 600 space car park to be built as part of the first phase of the development (which is to be the only public car park on the site) is demonstrably a substantial reduction on the level of public car parking in this area. Consequently, the replacement car park is consistent with the overall policy of refocussing off-street parking closer to the main city centre.
- 5.9 The existing MSCP was closed as a result of safety concerns but in planning terms could be re-opened at any time although I accept that this is highly unlikely. This has left just the surface car parks operational and this resulted in some 'headroom' within the cap and a number of temporary car parks have been permitted in the interim period to address this shortfall.
- 5.10 Whilst there is, therefore, a substantial reduction in the overall level of public car parking on the site as a significant proportion of this is currently out of use, the available spaces will increase by about 100 spaces over the current usable provision. This could result in a total of 10,055 public car parking spaces becoming available in the City Centre (above the cap level). However, the temporary planning permissions that have only been permitted whilst the level of city centre car parking remains below the cap (primarily as a result of the closure of the existing Anglia Square MSCP) will expire allowing for the redevelopment of the relevant sites and maintenance of the number of public car parking spaces remaining below the 10,000 space cap.

5.11 The new car park also achieves the policy aims of consolidating existing parking in a single accessible location. In addition, being multi-storey it releases land for development. The provision of Variable Message Signing is a requirement of all new car parks, as is a tariff to promote short and medium stay use. These should be secured by condition. Access to the public car park is via a single point onto Edward Street providing easy access to and from the main road network. It also results in a rationalisation of the multiplicity of access points to the various car parks that currently service the site. Policy DM29 specifically seeks these improvements to existing public car park provisions and the proposed MSCP is thus fully compliant with the City's public parking policies.

Residential car and cycle parking and Servicing

5.12 Policy DM31 is the main policy that details the requirements for parking and servicing requirements, and the associated standards are laid out in Appendix 3 of the Norwich Local Plan Development Management policies plan. The requirements for appropriate servicing arrangements are laid out in policy 27 of NATS.

Residential Car parking

5.13 I have already discussed the public car parking provision on the site above, so do not propose to discuss that further. A total of 910 parking spaces are proposed to serve the 1209-1250 dwellings. Depending on the final dwelling number, this equates to a parking ratio of between 0.72 – 0.75 spaces per unit. Policy DM31 states that in this location ('elsewhere in the City centre parking area') car-free parking is permitted and the policy sets a maximum permitted parking ratio of one space per dwelling. The level of car parking proposed is, therefore, policy compliant.

Electric car charging points

5.14 There have been significant changes in the levels of electric vehicle ownership and use and the associated technology since the current policies and standards were adopted and these were based on the limited information about the potential growth in this sector that was available at the time. It is likely that the standards for electric vehicle charging will be reviewed, but the scheme is currently policy compliant.

Cycle Parking

5.15 The City Council's policy is to achieve at least one cycle parking place per one-bedroomed residential unit (more is required for 2+ bedroomed units). However, this standard applies to all new build properties and in very many cases is provided individually for each new dwelling. This scheme proposes substantial communal cycle stores with a total of 1372 residential cycle parking spaces – just above a 1:1 ratio. This is below the 1781 spaces that would normally be required for the mix of 1 and 2 bed dwellings proposed. However, the communal cycle stores will allow spaces to be used more efficiently, with any spare capacity created by non-bike owners being taken up by flats owners with more than one bike and in my opinion, the reduction proposed is reasonable given the scale of the development and the flexibility with which the cycle parking can be used. The early phases should, however, be monitored to ensure that the provision does prove to be adequate, and adjustments made to later phases when the detailed proposals for these phases are designed.

Servicing

- 5.16 Commercial units to the north and south of the site have dedicated service yards (accesses via Edward Street and St Crispins Road respectively). Within the site, where commercial units have only frontage to the 'pedestrianised' areas, timed access restrictions are proposed. It is well established that service vehicles can be accommodated in pedestrianised areas and that pedestrian movement tends to dominate low levels of traffic movement. Research by Transport for London, referenced in MfS ⁵(CD11.28), has shown that in streets where traffic levels are below 100 vehicles per hour, pedestrians tend to use the entire space available, whilst over that level, they tend to regard the space as a road to be crossed rather than a space to be occupied. In addition, there are loading bays on the periphery of the development that can provide for servicing at all times. In my opinion, the approach proposed is again the right one. Providing segregated service bays for a substantial number of the commercial units and expecting the smaller number with only live frontage to the pedestrian dominated areas to service from the front minimises vehicle movement within the site and ensures it is not severed by allocated service routes.
- 5.17 There is an estimate in the TA that between 100 and 113 daily movements will be associated with the servicing of the residential units. The majority of these are likely to make use of the loading bays around the edge of the site on the existing road network.

⁵ MfS foot of P83

Traffic Impact

- 5.18 Overall, the transport strategy for the City seeks to cater for increased demand to transport by means other than the private car (Policy 8 of NATS) and this is recognised in Policy DM28. However, it is not reasonable to expect that new development will not result in any increase in traffic and the overall strategy seeks to mitigate that by encouraging modal shift elsewhere and requiring development to minimise their overall impact through sustainable transport improvements and travel planning and by making the best use of the most sustainably located sites. I have already discussed how this development achieves these objectives both with respect to its own impact and the opportunities that it provides for sustainable transport options for those who already live and work in the area.
- 5.19 I believe the estimated traffic generation of the site to be a robust assessment, particularly as the residential elements are based on existing developments in Norwich similarly located in relation to the City Centre and also because Anglia Square currently has public car parks almost of the scale of the proposed multi-storey car park. Norfolk County Council as Highway Authority has reviewed the trip rates and has confirmed that they represent a realistic assessment of the likely impact. It is a consequence of the highly accessible nature of this site that trip generation is so low for such a substantial scheme. A similar number of dwellings in a more suburban or rural location would have a significantly higher trip rate. In transport terms, therefore, locating a substantial development in this location; including the substantial number of residential units has less overall traffic impact than schemes of a similar scale elsewhere.
- 5.20 The 2009 redevelopment proposals are relevant here. The St Augustine's Gyratory scheme formed part of those proposals and was designed to cater for them. The proposals were subsequently revised and the traffic generation of the revised scheme assessed. The current proposed development has significantly less impact in terms of traffic generation than that previously approved development.

6 OBJECTIONS

6.1 Some objections on transport grounds have been received from the Norwich Cycling Campaign. I do not propose to deal with all their objections as some (and in particular those relating to Air Quality and design) are beyond the scope of my evidence.

Travel plan

6.2 The scheme is not currently supported by a travel plan, but at this stage, with only part of the development submitted as full proposals and most of it in outline with the occupiers as yet unknown, I think that this expectation is unrealistic.

6.3 As the transport assessment makes clear (para7.2.3), Travel plans are live documents that need to respond to changing circumstances and be reviewed and monitored to ensure their effectiveness. They also need to be tailored to the needs of the individuals and organisations that they intended for. It is, however, appropriate to have a framework for implementation of a travel plan in place prior to first occupation of any part of the development which ensures its subsequent implementation and review. Such a framework is included in the TA (in Appendix X) and the implementation of a full travel Plan for both the residential and non-residential elements of the scheme should be conditioned. This will be a substantial improvement over the current situation as no travel plan currently exists for this site.

Parking and sustainability

6.4 I have already detailed the Council's policy with respect to public car parking in the City Centre and the reasons why this site is highly sustainable in transport terms. The population of the Norwich policy area is growing, but the expectation overall is that, within the urban area, additional demand will be met by means other than the private car. Maximising the use of accessible sites achieves this objective both in terms of those who live there and in terms of those who use the site for other purposes.

Permeability

6.5 I have discussed the approach to the spaces and routes within the development elsewhere in my evidence. I agree that the site needs to be permeable, but that does not require a plethora of interconnecting routes. Even with St Anne's Walk closed there remain three east-west routes from Magdalen Street within 140 metres (Edward Street, Sovereign Way and Elephant Walk). Sovereign Way enters the main central Square, which I anticipate will be dominated by pedestrian movement and where I would expect any cyclist using it as a through route to take full account of their surrounding and be cycling at a low speed. This is a route entering a public square and such routes do tend to have building on them that result in 90 degree corners. That is typical of any urban street.

Servicing

6.6 There is no suggestion in the TA (or indeed anywhere else) that there would be between 100 and 113 deliveries a day within the pedestrian areas. These deliveries are clearly shown to the residential units, and service bays to the edge of the site are provided for this. Even if there were this many deliveries within the site itself, that would still be consistent with the research by TRL I mentioned earlier, but it seems likely (given the relatively small number of units which front the pedestrian areas only and have no service yard) that the level of vehicle movement would be substantially lower than that. Severing the site for such a few vehicle movements would, in my opinion, substantially detract for the scheme's proposed routes and squares. I also think it would be undesirable to sever the squares in order to provide a segregated cycle route. The City has substantial experience of accommodating low levels of vehicles within what are otherwise significant public spaces. Defining turning spaces for a vehicle is both pointless and counterproductive.

Construction management plan

6.7 It is usual practice to submit a construction management plan as part of redevelopment proposals, particularly those on a scale such as this. Whilst disruption is inevitable and the safety of the public is paramount, I would expect any plan to seek to maintain adequate access around the site at all times. It is unrealistic to expect any street to be upgraded prior to that phase of the development being completed, however, as development usually results in substantial damage to the surrounding highway requiring substantial reconstruction. A Construction Management Plan should be required by condition.

Provision for cycles

6.8 I have already discussed the overall level of cycle provision for the residential units and would expect both the final location and the design of any cycle stands within the public realm to be subject to condition. Norwich has both traditional 'Sheffield' type stands based on the 'Norwich' in its historic areas with increasing use of the 'Camden' stand elsewhere. I would expect this approach to continue unless an improved form of cycle stand is developed, in which case there would be a case to change this approach. These stands are straightforward to use and provide for the high turnover that would be expected within a district centre. For the longer term cycle storage associated with the flats, a denser form of cycle storage is appropriate and this is provided at ground floor level in block A. Inevitably this is close to the bin store as both the cycle store and the bin stores need to be easily accessible to both residents and the adjacent street. Whilst I agree that residential cycle parking should, wherever possible, be located at ground floor adjacent to main entrances it is appropriate to ensure that this makes efficient use of that ground floor space.

Car club

6.9 I have already discussed the appropriate approach to the provision for the car club, and the reason why this needs to evolve over time.

Edward Street

6.10 I agree that Edward Street is currently a quiet route and that it will become busier. However, the level of traffic will still remain remarkably low and consistent with many quiet side streets, and consequently a more formal crossing facility is unnecessary. The shared pathway to the north is currently insufficiently wide, but widening it is proposed as part of the development (See Appendix B of the Transport Assessment Addendum CD7.81SEI(r)).

7 CONCLUSIONS

7.1 The site is in a highly sustainable location and from the transportation perspective, substantial development is both appropriate and desirable here. The highway impacts of the development are adequately mitigated so far as not to adversely affect the local road network by the promotion of travel by walking, cycling, car club and by bus as an alternative to the private car. In accordance with the NPPF the development takes appropriate opportunities to promote sustainable travel modes; makes provision for safe and suitable access and proposes suitable measures to mitigate the impact of the development on the transport network. In the event of planning permission being approved it is recommended that planning conditions be imposed relating to: Construction Management Plans, off-site highway works, submission/agreement and implementation of travel plans; monitoring arrangement for car and cycle parking; cycle parking provision; EVCP provision and arrangements relating to the operation of the MSCP. Matters relating to car club and public access rights through the site will need to be secured through a S106 Obligation.