

APPEAL BY NEWETT HOMES IN RESPECT OF LAND NORTH EAST OF SHEPLEY
ROAD, STOCKSMOOR, HUDDERSFIELD, HD4 6XW

CLOSING SUBMISSIONS OF THE LOCAL PLANNING AUTHORITY

1. These closing submissions only address the substance of the one issue of concern to the Council, namely the safety of the operation of Stone Wood Lane and the amenity of active travel users on that route, if the appeal scheme were to go ahead. The proposed section 106 obligation, when executed, would resolve RfR2.

The nature of the Council's objection.

2. The decision notice¹ sets out RfR1. The Council's case is that the additional traffic on Stone Wood Lane would adversely affect the safe and efficient movement of traffic by all modes and would be particularly detrimental to active travel users. The proposed mitigation measures would be insufficient to acceptably mitigate that harm. The result would be an unacceptable impact on highway safety and on the amenity of active travel users.

¹ CD3.2

3. It is not the Council’s case that the appeal scheme would cause unacceptable impacts on highway capacity.

Development Plan policy

4. No difficult issues relating to the interpretation or application of Development Plan policy arise. Indeed, neither party has thought it necessary to explore the policies relevant to RfR1 in the evidence. The relevant policies are set out in the Kirklees Local Plan, adopted in 2019. The position is as follows:

- a. Policy LP21² deals with highways and access. Criterion (a) requires proposal to ensure the safe and efficient flow of traffic within the site and on the surrounding highway network. Criterion (b) requires the provision of necessary new infrastructure and criterion (e) requires proposals to take into account the surrounding roads’ and footpaths’ features to ensure the development can be accessed safely; and
- b. Policy LP24³ is a detailed policy on design. Part (d) requires high levels of sustainability through various means, part (ii) of which sets out that there should be a design that promotes behavioural change by, among other things, making walking and cycling more attractive.

² CD6.1, PDF page 29, plan page 104.

³ CD6.1, PDF page 34, plan page 111

5. It is no part of the Appellant's case to contend that these Development Plan policies are inconsistent with the NPPF. They can thus be afforded full weight in decision making.

National Policy

6. In formulating, promoting and assessing the appeal scheme, the Appellant has forgotten or ignored what the NPPF requires.
7. Paragraph 109 of the NPPF tells us that transport issues should be considered from the earliest stages of a proposal, using a vision-led approach to identify transport solutions. The vision-led approach is defined in the NPPF glossary as one which sets outcomes for proposed development based, among other things, upon achieving sustainable places and which then provides the solutions to deliver those outcomes. A notable feature of the appeal scheme is that none of the three firms of highway consultants engaged by the Appellant has provided an estimate of trips by sustainable modes, still less set out to deliver any particular proportion of such trips. The entire focus has been upon vehicular trips and trying to ensure that they can use the local network. That, it is submitted, is a key indicator of where the Appellant has gone wrong in this case.
8. Paragraph 115(a) of the NPPF requires that, when assessing development proposals, sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location. Paragraph 115(d) seeks to ensure that any significant impacts of a proposal on the transport network, including in relation to safety, can be cost-effectively mitigated to an acceptable degree through the vision-led approach.

9. Given the stress placed on paragraph 116 of the NPPF by the Appellant, it is worth addressing in detail. It provides:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

10. Leaving capacity issues aside as irrelevant to the Council’s case, the Council accepts that paragraph 116 of the NPPF requires that there be more than just some adverse impact on safety. The impact has to be “unacceptable”, importing matters of judgement. In RX of Mr Owen and during the round table session on day 4, Mr Sagar contended that amenity issues were irrelevant to paragraph 116. That may be so, but it simply does not follow that the amenity of the users of the highway, particularly those not in vehicles, is irrelevant to decision making. To take such an approach would be to leave an obvious material consideration out of account, especially in the light of the expressed priority to be given to sustainable modes in paragraph 115(a), as we have seen. Further, paragraph 117 of the NPPF, albeit it operating within the context of paragraph 116, requires first priority to be given to pedestrian and cyclist movements both within the scheme and “with neighbouring areas” and paragraph 117(c) requires applications to create places that, among other things, are safe and attractive and “which minimise the scope for conflicts between pedestrians, cyclists and vehicles.”

11. The appeal scheme is simply inconsistent with this policy approach:

- a. The appeal scheme was prepared and submitted without any reference to any mitigation measures. They only became part of the proposals at the stage when TPS, the second consultant, was engaged;
- b. At no stage have the Appellant or its numerous highway consultants turned their collective minds to the multi-modal trips that the scheme would generate. One will search in vain for any statement of the number of pedestrians or cyclists, for example, that the appeal scheme would generate at all, still less how many of them could be expected to use Stone Wood Lane; and
- c. The mitigation proposals are all about accommodating vehicle traffic. There is no provision made for active travel users in the package proposed either by TPS or Optima. The idea that the passing places are designed to assist pedestrians is risible, given that they would demonstrably not accommodate pedestrian or cyclists as well as cars passing each other in opposite directions. Any benefit to pedestrians is not a designed feature of the appeal scheme, but a minor by-product of the provision of vehicular passing places when they are not being used by opposing vehicles.

12. These factors combine to powerfully demonstrate that the appeal scheme's package of works is a scheme following the old-fashioned approach of providing for car users. The needs of active travel users have not featured in scheme design as they should have. The result is a scheme that does precious little to accommodate those users and makes matters worse for them by putting more vehicles onto a substandard highway with an unknown number of new active travel users.

The site's status as safeguarded land.

13. The fact that the site is allocated as safeguarded land is not to be taken as the appeal scheme being given a clean bill of health in highway terms. That is for the following reasons.
14. The exercise at plan-making stage was plainly a high level one. The intention was never to show that all potential issues had been fully addressed. The site was not being allocated for housing development. The test, as Mr Johnson was fair enough voluntarily to recognise in the session on day 4, was to consider whether there was a reasonable prospect that a site would be suitable for allocation when the plan was reviewed. The methodology used in the assessment of the potential safeguarded sites did address off-site highways issues to some degree⁴, but there is no very clear evidence as to what that entailed for the appeal site. In particular, there is simply no evidence as to what degree of attention, if any, was given to the characteristics of Stone Wood Lane. The available evidence is confined to the technical appraisals carried out in November 2016⁵ and July 2017⁶. These appraisals set out that there were no transport constraints but the commentary, in both cases, is about the site access and frontage.
15. The Local Plan Inspectors probed the soundness of the proposed safeguarded land allocations further during the examination process. The Council produced a schedule of the safeguarded sites, showing their constraints and providing an assessment of their future delivery⁷. For the appeal site, the assessment of the site's conformity with the NPPF read:

⁴ CD6.13: Local Plan Methodology Statement Part 2, para 4.35.

⁵ Mr Johnson's Appendix 1

⁶ Mr Johnson's Appendix 2

⁷ Relevant extract is at CD6.8

“There is insufficient evidence to demonstrate this site is deliverable and/or developable during the Local Plan period, however there is a reasonable prospect that site specific site constraints can be overcome and the site is capable of coming forward for development post 2031. In this case third party land would need to be acquired which is not currently available and further consideration of the scale of development in relation to the local road network.”

16. This document should not be over-interpreted or unevidenced inferences drawn from it. It simply does not say what third party land is being referred to. It does not refer to it being required for access into the site itself.

17. The Inspectors’ report into the Local Plan concluded at paragraph 380⁸ that the site could be allocated, but said:

“Third party land is needed to provide access but there is a reasonable prospect of securing this beyond the plan period.”

18. Again, this should not be over-interpreted. There is no indication of what land is being referred to.

19. It would not be appropriate to conclude that the Local Plan Inspectors ever even considered arguments akin to those made by Mr Darwin, let alone that they considered and rejected them.

⁸ Quoted at paragraph 3.34 of Mr Johnson’s proof.

20. The short point is that despite the Local Plan history and the allocation of the site as safeguarded land, Mr Darwin's contentions need to be tested on their own merits in the light of the evidence now presented. Mr Owen accepted as much in XXm. The need to test the case on its own merits is also true despite there being allocations for housing and another safeguarded land allocation in Stocksmoor. It is obvious that the evidence available to this inquiry is far more detailed than that which was available to the Local Plan Inspectors who were, in any event, only considering whether there was reasonable prospect of deliverability when the site was needed and upon a Local Plan review taking place.

Baseline conditions.

21. There is no dispute that Stone Wood Lane does not meet modern geometrical standards. In fact, it has serious deficiencies. It has significant stretches where vehicles cannot pass, informal passing places that do not have sufficient width and stretches where informal passing places are not intervisible. There are two locations in particular where intervisibility is poor: between existing passing place 4 and the existing informal passing place to its north and also a considerable length (at least 130m) from the top of the bank (at the Shepley side) descending around a left hand bend and into the wooded valley, where the road varies between about 3.2m and 3.9m.

22. The lack of width and intervisibility of passing places mean that drivers face having to make a decision on whether to proceed without being able to know what is coming in the opposite direction in the narrow section they are about to enter. That means that vehicles meet where they cannot pass. Someone has to reverse to the nearest location where passing

is possible. Because there is a considerable proportion of the length of Stone Wood Lane where passing is not possible, when the passing places are used, platoons of vehicles form, meaning that there are occasions where multiple vehicles have to reverse. Mr Owen has not seen that happen, but the Appellant did not dispute Mr Darwin's evidence that he had seen such episodes for himself.

23. The use of Stone Wood Lane by pedestrians and other active travel users leads to conflict between cars and active users. Pedestrians have to take refuge on the narrow, uneven verges, often close to boundary walls, to allow vehicles to pass. It has no dedicated pedestrian facilities and operates as a shared surface. Mr Darwin has found the use of Stone Wood Lane as a pedestrian to be unattractive. Mr Owen did not, but he did accept in XXm that a reasonable person could find the use of Stone Wood Lane intimidating. And, unsurprisingly, Mr Owen's site visits did not involve him pushing a pram or being accompanied by a stropky toddler. All types of active travel user need to be borne in mind when assessing the appeal scheme.

24. There are places where vehicles can physically squeeze past each other but they are narrow. There is no justification for using 4.1m width of highway as a suitable width to pass, as opposed to it being a width where two cars can physically manage to pass. A car and any vehicle of the width of a van or greater cannot pass in a 4.1m wide way. There is no secure evidential basis for the Appellant's reference to the 4.1m distance:

- a. Manual for Streets 1 ("MfS1"), at figure 7.1, shows highways of various widths. It shows that 2 cars of 2m width can just pass each other within a 4.1m wide way, but that leaves hardly any room for driver mistakes (particularly on a

highway bounded by walls) and no room for any other user in the highway. The caption to figure 7.1 is at pains to say that the contents of the figure are not recommendations; and

- b. The Appellant cannot draw any assistance from the Kirklees Design Guide⁹ in relation to the 4.1m width. Figure 7.1 of MfS1 is reproduced (minus the caption) on its page 35, but there is no reference in the supporting text to the 4.1m width, let alone an endorsement of it of any kind. Indeed, the Key Design Driver at paragraph 3.29 on the previous page refers to a width of 5.5m being the width which allows all vehicles to pass each other. There is simply no support for a 4.1m width in the Design Guide, even as regards a highway that is not bounded by walls at the edge of the hard surfaced carriageway.

25. There is a slight difference of opinion as regards baseline flows. Mr Darwin's figures for the maximum average flows take into account flows surveyed in April 2024. Mr Owen leaves that data out of account. Mr Darwin is right to include them, as they were carried out to show that the site access proposal was appropriate, and so they form an important part of the evidence base for the highway issues which the appeal scheme raises overall (even though the Council is happy with the latest site access arrangements). Mr Owen's reasons for rejecting the use of that survey data are unsound as Mr Darwin's rebuttal shows that allowing for the presence of houses south of the northern end of the survey area would only reduce flows by a maximum of one vehicle.

⁹ CD6.6

26. Mr Darwin therefore uses peak hour two-way maximum average flows of 69 in the AM peak and 74 in the PM peak, as compared to Mr Owen's figures of 65 and 74 for the two peak hours. In doing that, Mr Darwin is being generous to the Appellant because it dilutes the proportionate effect of the additional appeal site traffic, whatever that is.
27. It is a matter of fact that there have not been any recorded personal injury accidents in the past 15 years. It is also accepted that that is a longer period than the 3 or 5 years referred to in the PPG. But it would be wrong to conclude that the highway is safe simply because of the lack of accidents. Mr Darwin's evidence at para 3.35 shows that Stone Wood Lane is a road of a type that one normally be expected to generate, on average, one Personal Injury Accident every 20 to 25 years.
28. It is perfectly proper to form a judgement on the safety of Stone Wood Lane by reference to the evidence heard at the inquiry and through on-site observation of the operation of the highway.

Trip Generation

29. This can be dealt with shortly. Whatever the complexities of the parties' routes to their end points, there is now an immaterial difference between the parties. The Appellant considers that the two way peak hour trip generation to and from the appeal site would be 30 trips in each peak. The Council considers the figure to be 32. There is no merit in exploring, still less trying to resolve, such a modest difference.

Trip Distribution.

30. Mr Owen accepted in XXm that there is not one objectively verifiable answer to the trip distribution of a proposal. Judgement is involved. One can see that vividly in the differing distribution of trips in the Appellant's three consultants' work:

- a. The first consultant considered that only 3.8% of the traffic generated by the appeal scheme would use Stone Wood Lane. No-one at the inquiry is now advocating such a split;
- b. TPS referred to a distribution of around¹⁰ 50%; and
- c. Mr Owen uses a trip distribution of approximately 25% of trips.

31. At various times, the Appellant has put these distributions forward. That is a clear illustration of the variability of opinions that can be formed by competent experts.

32. Mr Darwin's judgement is that the 50% split is reasonable. It is crucial to note that his attitude to the TPS work was that their end point was a reasonable judgement as to trip distribution, but he never agreed with the precise reasoning that led TPS to that view. It is also important to note that TPS did *not* present the distribution in the Transport Assessment Addendum as some kind of sensitivity test to the split used in the first consultant's work. Paragraph 4.11 of the TAA¹¹ does not say that the distribution used is a sensitivity test and,

¹⁰ It was a 47%/53% split

¹¹ CD1.33

tellingly, no other distribution is referred to. Perhaps most strikingly, the TAA at paragraph 6.8 presents the trips derived from an approximately 50% split as the trip distribution of the scheme. Mr Darwin can draw some comfort from the fact that he agrees with TPS. It is a sensible judgment given the wider range and greater number of facilities in Shepley as compared to Stocksmoor and that Stone Wood Lane provides the most direct (but not the only) route between the two villages. There is no reason to conclude that there would be “minimal” trips between the two villages as Mr Owen does at paragraph 5.5.2 of his proof.

33. Mr Owen points to two pieces of his own work to justify his trip distribution:

- a. The assessment in what became Appendix 3 to the Appellant’s Statement of Case; and
- b. The turning movement survey carried out in November 2025.

34. Neither of those pieces of work is robust and they contain the application of judgement.

They are no more objectively true than Mr Darwin’s judgement. The fact that they corroborate each other is of no use if one or both of them is not robust. Nor is the fact that Mr Owen’s output matches the output of the small survey carried out by the Rule 6 party and upon which the Rule 6 party was itself unhappy to rely during the inquiry.

35. The work in the SoC appendix is not robust for the following reasons given by Mr Darwin:

- a. It combines trip patterns that relate to two fairly large Medium Super Output Areas (“MSOA”). That has the effect of imputing to the appeal site journey

patterns that occur in places other than Stocksmoor and are not the same as Stocksmoor. If another part of either MSOA has different facilities from Stocksmoor or is proximate to settlements different from Stocksmoor, then it is not robust to apply the travel patterns associated to such areas to Stocksmoor or the appeal site. That is the case. Mr Owen said in his rebuttal at paragraph 2.14 that the two MSOAs addressed contained “numerous” other villages that are similar to Stocksmoor in terms of local facilities. When given the free hit in XXm to name any, he couldn’t do so;

- b. When assigning journeys to and from one MSOA to another MSOA to routes, Mr Owen accepted that he had used judgement to do so. So, when the detail is penetrated, he has simply used judgement like Mr Darwin has done. The reasons for his judgements across the 503 MSOAs are not transparent. That is so even if assigning journeys to/from Sheffield and Elland Park to Stone Wood Lane makes no meaningful difference, by themselves, to the outputs. The same is true despite Mr Owen re-running the exercise with the full number of 4,212 commuters in the MSOAs rather than the 3,714 originally assessed;
- c. On education, Mr Darwin was asked in XXm about table C in his appendix D, which deals with where pupils who live in each relevant school’s catchment actually go to school. That exercise is not related to Stocksmoor, but to larger Pupil Planning Areas. It cannot readily be translated to the appeal site; and
- d. On retail and “other” trips, Mr Owen just distributed them equally to each of the four main compass points without much explanation.

36. The Stocksmoor turning survey carried out in November 2025 is wholly unreliable. Mr Owen regrettably never acknowledged or addressed in his main proof that that survey took place at a time when roadworks were about to be started and were underway. The factual position is that works were started around the middle of 11th November 2025 and therefore were in place during the afternoon of day 1 of the survey and all of day 2. The roadworks involved two way traffic lights on some part of the length of Station Road between Shepley Road and the railway station. The works were not emergency works but planned. It is unclear what degree of advance notice was given to local people, but Mr Darwin explained that some advance warning would be usual.

37. Mr Owen actually drew attention himself to the part of the PPG that shows why the commissioned survey is unreliable. Paragraph 015¹² of the relevant chapter of the PPG¹³ states that:

“In general, assessments should be based on normal traffic flow and usage conditions (e.g. non-school holiday periods, typical weather conditions)...”

38. It simply not credible for Mr Owen to claim that the survey was carried out during normal traffic flow and usage conditions. For half of day 1 and all of day 2 roadworks were in place. It is not clear whether usage on the first morning was affected by any advance warning. Mr Owen was quite wrong to assert that the roadworks made no difference

¹² “What information should be included in Transport Assessments and Statements?”

¹³ “Travel Plans, Transport Assessments and Statements”, CD7.8, PDF page

because in order to be able to show that, he would have to have some turning data unaffected by the roadworks to which the survey could be compared. He has none.

39. The problems posed by the November survey could have been avoided if the intention to carry it out was discussed with Mr Darwin in advance. Again, the PPG to which Mr Owen himself drew attention makes that point for the Council. Paragraph 007¹⁴ of the PPG, which Mr Owen drew attention to in his evidence¹⁵ makes the point that work in TAs, like surveys, should be “brought forward through collaborative working with the local planning authority/transport authority” among others. It has been an ongoing theme of the Appellant’s pursuit of the appeal scheme that the LPA and LHA have unhelpfully been presented with completed work rather than consulted upon it in advance of its completion.

40. The roadworks amount to a sufficient reason to put the November survey in a metaphorical bin. But that problem is compounded by the carrying out of the survey in a non-neutral month. Contrary to Mr Owen’s position, the concept of neutral months is still relevant: see the references to the DMRB that were put to Mr Owen in XXm. There is no reason why neutral months should be relevant to speed surveys on trunk roads but not to traffic movements on the local network.

41. Mr Owen’s distribution does not have the robustness claimed for it. Mr Darwin’s distribution should, at the very least, be taken into account. It forms a realistic scenario for assessing the appeal scheme.

¹⁴ Also within CD7.8

¹⁵ Albeit that he wrongly refers to it as paragraph 006

42. Despite the attention paid to distribution in the evidence and in these submissions, resolving the outcome of the dispute is not critical. That is because Mr Darwin considers the appeal scheme to be unacceptably unsafe even if the Appellant's distribution of 7 two way trips is used and Mr Owen considers the appeal scheme to be safe even if the Council's figure of 16 is used.

43. The Appellant's point that the appeal scheme's impact is within the daily variation of flows is a thoroughly bad point. This inquiry is not concerned with capacity issues. Whatever the daily variation in flows, the appeal scheme's effect is always to add more traffic (and possibly active travellers) to each day's baseline when compared to the no-scheme world. The risk posed by the appeal scheme is always increased as a result of the appeal scheme's traffic generation and use of Stone Wood Lane.

The Mitigation Works

44. Mr Owen and the Appellant promote the Optima works. They accept that they should be conditioned. In XXm Mr Owen was taken, in stages, through what that means. The logic of the Appellant's position is that the Appellant must accept that the works meet the tests for a condition, meaning that they are necessary and that planning permission should not be granted without them. That raises two points:

- a. It draws attention to the inadequate way in which the scheme was first promoted as no mitigation works on Stone Wood Lane were included in the application until TPS became involved; and

- b. Conditions cannot be used to secure works that are nice to have. They must be required. That can only be an implicit acceptance by the Appellant that Stone Wood Lane, with the appeal scheme in place would be unacceptable without the works. In other words, there is a serious issue to be considered.

45. The detail of what is proposed need not be rehearsed in detail in closing. The inquiry heard the evidence of both Messrs Darwin and Owen. The locations have been seen on site. The following general points can be made:

- a. The works are influenced by Mr Owen's view of the adequacy of the 4.1m width, although it is accepted that some are materially wider than that;
- b. Mr Darwin drew attention to the TRRL advice for passing places¹⁶ that recommended that they be designed to provide a total of 5.5m width to allow vehicles to pass and an effective length of 11m, allowing more than one car to use them at a time. It is the only detailed material before the inquiry that specifically addresses passing place design;
- c. The works would largely be ones which made relatively minor changes to existing informal passing places;
- d. They are all designed to allow two cars to pass and scant attention has been paid to the passage of a car with a larger vehicle and no attention to what happens if

¹⁶ CD4.14, consultation response of 14th October 2024, PDF page 5 of 10, reproducing diagram of recommended dimensions.

an active traveller is at the passing place – the space provided is only to accommodate passing cars;

- e. With the exception of the new Optima Passing Place 5, no tracking diagrams have been provided to show that the passing places work even for two cars to pass, let alone any longer or wider vehicles;
- f. Mr Darwin was critical of the locations chosen for some of cross-sections used in Mr Owen's rebuttal Appendix F which do not clearly demonstrate the deliverability of the works;
- g. Mr Darwin expresses doubt as to whether some of the works can be done without requiring work of some kind to be done to boundary walls, or works to trees and vegetation (particularly to safeguard airspace above the passing places) which are not shown to be part of the highway; and
- h. None of the proposed works do anything to improve the situation on the problematic length down (from Shepley) into the wooded valley.

46. Overall, the proposed mitigation works provide, at best, modest improvement over the existing situation, but that improvement has to be seen in the light of the additional vehicular traffic that would take place and the additional active travel usage that one would expect to see arise.

The residual impact.

47. The Council's judgement is that the additional usage of Stone Wood Lane by vehicles and active travellers would have an unacceptable safety impact. The evidence has focussed, as is usual, upon the peak hours. But additional vehicles and active travellers would use Stone Wood Lane throughout the day, each day. It must not be thought that the only impact is that which arises from the 7 or 16 additional vehicles in the peak hour.

48. Mr Darwin carried out an assessment of the number of vehicle/pedestrian conflicts that would take place with the appeal scheme in place. He did the exercise using the data from the pedestrian surveys and the maximum measured peak hour flows. Mr Sagar properly pointed out that the relevant matter was the change brought about by the appeal scheme. The difference was an additional 2.5 conflicts per peak hour (19 conflicts as compared to the 16.5 in the present situation). But that exercise only served to reveal the flaw in the Appellant's approach. The exercise only addressed present pedestrian numbers. It made no allowance for the additional pedestrians introduced by the appeal scheme. If, on the one hand, the Appellant assumes no additional pedestrian usage, then that implies that pedestrians from the appeal site would be dissuaded from using or simply not use Stone Wood Lane. On the other hand, if pedestrians from the appeal site would use the Lane, then they ought to be taken into account. They cannot be accounted for in any meaningful way as the Appellant has never addressed pedestrian trip generation from the appeal site because of their vehicle-centred approach.

Planning Balance

49. Given the housing land supply position and the Housing Delivery Test results, the Council does not say that the safeguarded land status of the site combined with the fact that there has not been a Local Plan review should lead to the refusal of permission. The Council needs more housing land.

50. The Council's case stands or falls with the highways issues that it has raised. If they are not accepted, then the Council accepts that permission should be granted. The types and range of benefits that the appeal scheme would bring are not disputed, although there are differences in the weight descriptors that Ms Rann and Mr Johnson use for the benefits. Conversely, it appears to be accepted by the Appellant that *if* it is concluded that the appeal scheme would be unsafe in highway terms, then that issue could be one which is fatal to the appeal. However one comes at it, this is a one issue case so far as the Council and the Appellant are concerned. The Rule 6 party raises other objections, but they are not part of the Council's case.

Overall conclusion.

51. The Council submits that the site visit will have shown how unsuitable Stone Wood Lane is for accommodating the additional traffic that the appeal scheme would create. To allow the appeal would pose unacceptable risk and make an unpleasant experience of active travellers still worse. Despite the scheme's benefits and the lack of adequate housing delivery and supply, the highways impact of the appeal scheme amount to a cogent reason for refusing planning permission.

52. The Council submits that the appeal should be dismissed.

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4th March 2026

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