



Proposed development	Phased development of up to 1,200 houses on Land North of Magna Road
LPA reference	P/26/02365/OUT
Case Officer	Katie Herrington
Type of Comment	Objection
Date	16 September 2026

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Magwatch submitted an objection to P/26/02365/OUT on 22 July 2026. This second objection updates the original one by assessing the application against the new National Planning Policy Framework introduced on 17 August 2026.

It includes, as an appendix once again, the letter from transport consultancy Railton TPC Ltd.

1. GREEN BELT

1.1 INTRODUCTION

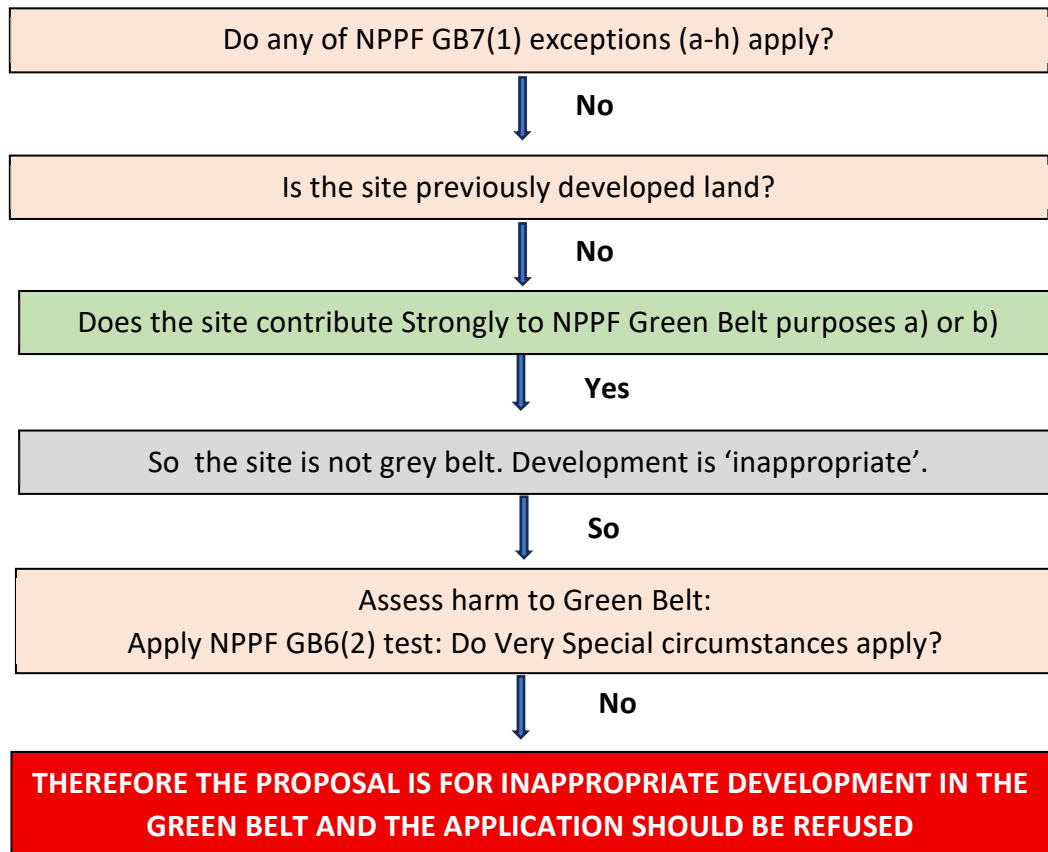
The applicant's Green Belt assessment was prepared by LDA Design (LDA), who in paragraph 1.3.1 state

The purpose of this report is to assess the performance of Green Belt purposes and potential harm to the Green Belt in the context of the policy tests in paragraphs 153-155 of the National Planning Policy Framework (NPPF).

The pathway for development in the Green Belt offered by paragraphs 153-155 of the 2024 NPPF has been superseded by GB6 and GB7 in the August 2026 Framework. Magwatch interrogates the applicant's claims in relation to this pathway and concludes that they carry



very little or no material weight. The flow chart below indicates the outline of Magwatch's argument.



Unallocated Site

A development similar to P/26/02365/OUT was promoted by WH White when the Call for Sites for the BCP Local Plan was made in October 2019. At this stage the land being offered was known as Land West of Knighton and was slightly larger than the 56.75 hectares of the proposed 'Canford Garden Village' site.

The promotion was unsuccessful. The Land West of Knighton was not allocated under the emerging BCP Local Plan (June 2024) which was submitted for Examination and subsequently withdrawn in 2025.

The failure to achieve allocation was presumably because of the impact that the development would have on the important and highly valued Green Belt land which lies between Bearwood and Canford Magna / Merley. A further reason is likely to have been that Bearwood and Merley ward had lost two swathes of Green Belt to two urban extensions under the Poole Local Plan of 2018.

As BCP's Urban Design Team have pointed out in their consultation response of 9 July 2026:

The principle of development remains a significant concern due to harm to the Green Belt, loss of openness, cumulative urban sprawl, and the erosion of separation between settlements. (page 1)



Inappropriate development in the Green Belt and possible exceptions

The application site lies on three parcels of Green Belt land that lie between Bearwood / Canford Magna. According to GB6(1) of the new Framework:

Development in the Green Belt is inappropriate unless it falls within one of the categories in policy GB7.

GB7 then lists eight criteria (a-h) which might constitute an exception. Only one of these possible exceptions offers a potential gateway to the proposed development, GB7(1)(g).

However, for the proposal to be classified as being *not* inappropriate development in the Green Belt, paragraph GB7(1)(g) requires *all four* of the following conditions to apply:

- i. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- ii. There is an evidenced unmet need for the type of development proposed⁴¹;
- iii. The development would be in a sustainable location, with particular reference to policy TR3 of this Framework⁴²; and
- iv. In the case of major development involving the provision of housing, the development proposed complies with policy GB8.

Whilst arguably condition ii) applies, none of the others do, as will be shown in this submission:

- the land is not grey belt; and it would, fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- the development is not sited in a sustainable location;
- GB(8)'The Golden Rules' does not apply because the Green Belt site has not been released for development.

A final possible avenue for the applicant lies in Framework paragraph G6(2) which states that

Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Such circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposed development, is clearly outweighed by other considerations. In making this assessment, substantial weight should be given to the harm to the Green Belt which would be caused, including harm to its openness.

The 1200 housing development would unquestionably be harmful to the openness of the Green Belt and there are no 'very special circumstances' which would outweigh the harm to the Green Belt, and other harms, which include traffic congestion and harm to the local ecosystem.

Protection of the Green Belt is further strengthened by paragraph S5 of the new framework, This will be examined in §1.4

1.2 GREEN BELT ASSESSMENTS

The application site lies within land parcels 11c, 11d, the eastern end of 11e, 12d and 12e, as assessed by the Poole Green Belt Review (PGBR) of 2017, which informed the Poole Local



Plan (2018), the extant local development plan. It should be noted that the eastern sub parcels of parcel 12 were allocated in the local plan for the creation of Canford Vale (Urban Extension 2), which is currently being built out and now constitutes part of the western edge of the Bournemouth / Bearwood conurbation, a fact which is relevant when considering the question of urban sprawl.

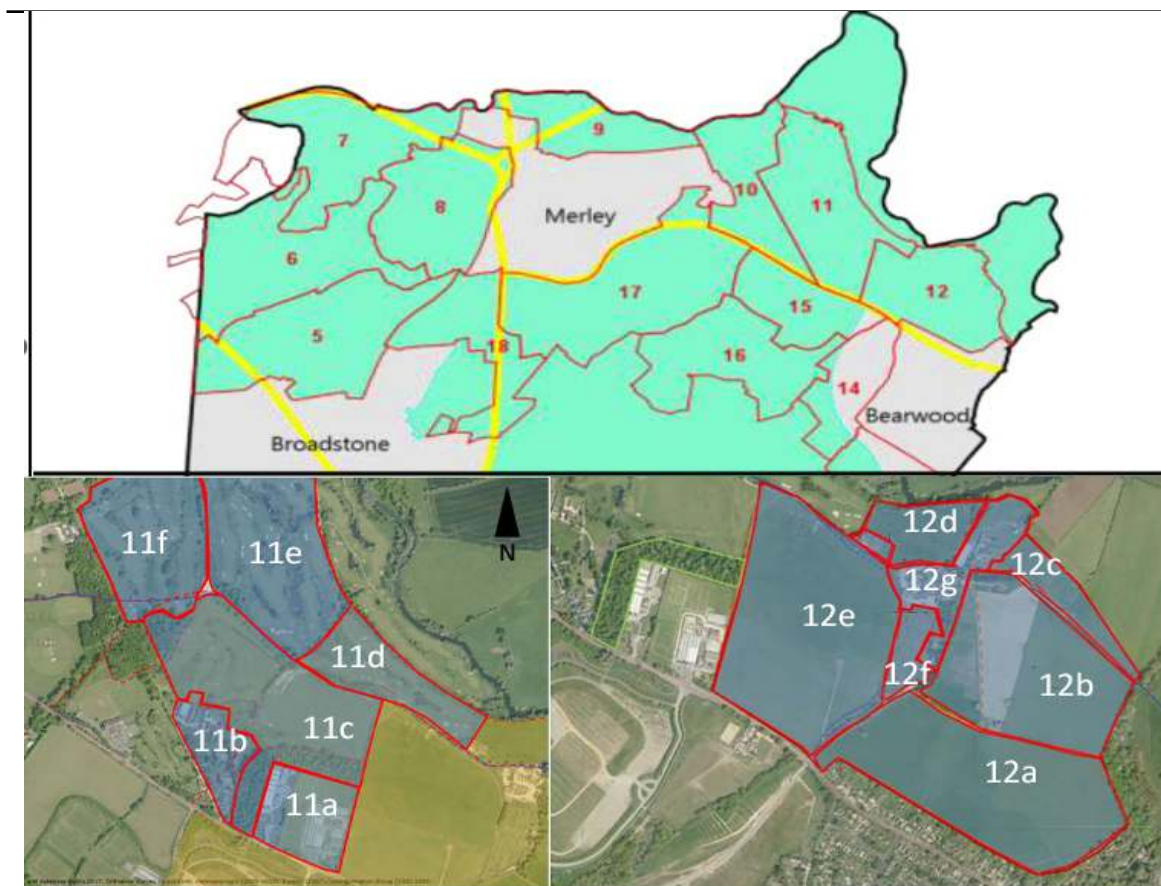


Fig 2. Poole Green Belt Review (2017) parcels of land 11 and 12

Table 1 below records PGBR's assessment of the contribution the relevant parcels of land make to the openness and permanence of the Green Belt and to the purposes a), b) and c) (purposes 1, 2 and 3) of Green Belt as outlined in NPPF paragraph 143.

Parcel ID	Essential Characteristic: Openness	Essential Characteristic: Permanence	NPPF Purpose 1 Rating To: check the unrestricted sprawl of large built-up areas	NPPF Purpose 2 Rating prevent neighbouring towns merging into one another	NPPF Purpose 3 Rating assist safeguarding the countryside from encroachment
11	High	Medium	Low (1)	Medium (2)	High (3)
Sub parcels					
11c	High	High	Low (1)	Medium (2)	High (3)
11d	High	Medium	Low (1)	Medium (2)	High (3)
11e	High	High	Low (1)	Medium (2)	High (3)
12d	High	High	Medium (2)	Low (1)	High (3)
12e	High	High	High (3)	Medium (2)	High (3)

Table 1. Poole Green Belt Review (2017) ratings of NPPF Green Belt purposes

Strategic Green Belt Assessment

A second assessment, the Strategic Green Belt Assessment of 2020 (SGBA), was undertaken to inform the BCP Local Plan, which was withdrawn in March 2025. The application site extends across three parcels: all of parcel PO21, part of the northern extent of OA31 and the western half of Parcel PO23:

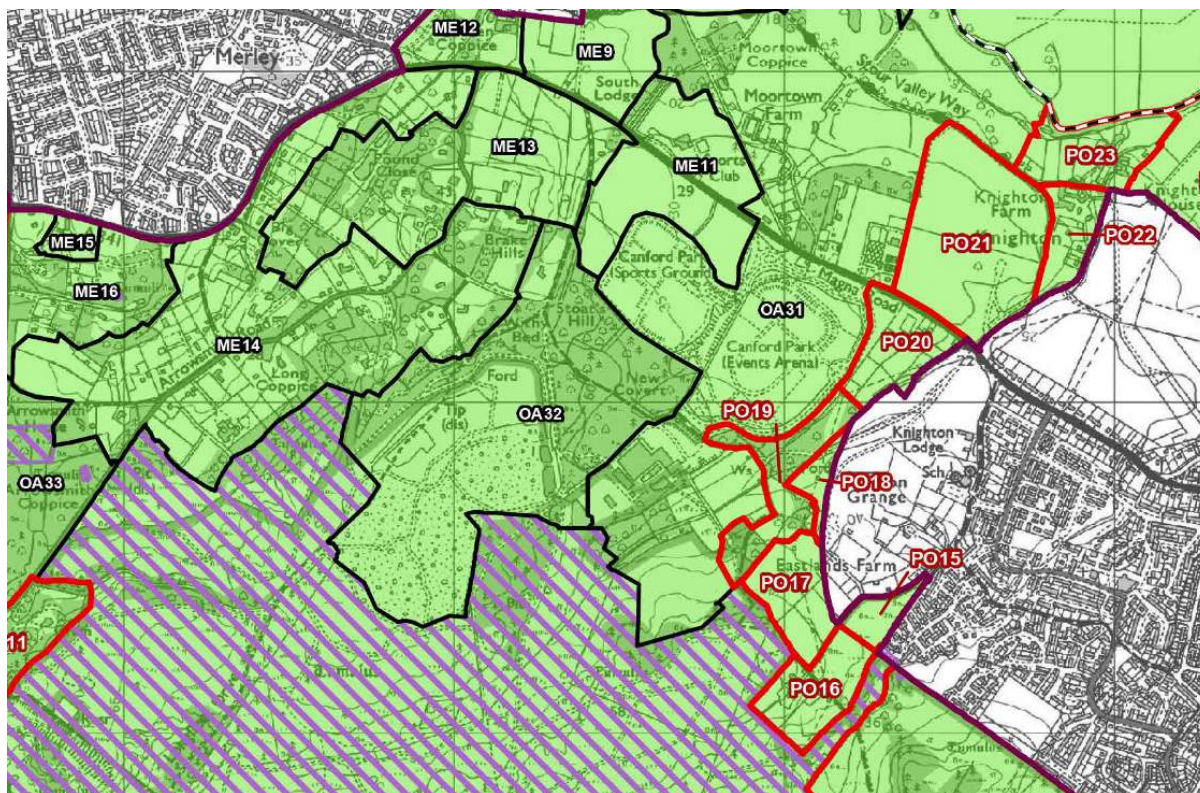


Figure 3. Strategic Green Belt Assessment (2020) parcels

Table 2 records SGBA's assessment of the contribution the relevant parcels of land make to purposes a), b) and c) (purposes 1, 2 and 3) of GB as outlined in NPPF para143.

The wording of the five purposes of the Green Belt remains the same in paragraph G2(1) of the 2026 Framework.

Parcel ID	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating
	To: check the unrestricted sprawl of large built-up areas	prevent neighbouring towns merging into one another	assist safeguarding the countryside from encroachment
OA31	Relatively Strong	Relatively Strong	Strong
PO21	Strong	Relatively Strong	Strong
PO23	Strong	Strong	Strong

Table 2. Strategic Green Belt Assessment (2020) ratings of NPPF Green Belt purposes

Considering the two Green Belt assessments, the inarguable conclusion is that the Green Belt land fulfils its NPPF roles effectively. It is therefore apparent why WH White's promotion of the application site for development was rejected.

Clearly, however, the two council assessments do not suit the intentions of WH White who, in response, commissioned LDA Design (LDA) to provide a Green Belt assessment which gave WH White the result they wanted. LDA duly obliged:

In summary, the assessment concludes that the Application Site is grey belt and that the test in NPPF paragraph 155(a) is met. The Planning Statement concludes that the tests in paragraphs 155(b) to (d) are also met, and accordingly the proposals do not represent inappropriate development in the Green Belt. (LDA 1.3.5)

In terms of the August 2026 Framework, LDA would claim that the application site is grey belt and that NPPF paragraph GB7(1)(g)(i) is met. The Planning Statement would argue that GB7(1)(g) ii, iii) and iv) are also met. and that accordingly the proposal does not represent inappropriate development in the Green Belt.

Given that the wording of GB7(1)(g) is substantively the same as paragraph 155 of the 2024 NPPF, Magwatch's arguments stand.

1.3 GREY BELT

GB7 is headed '*Development which is not inappropriate in the Green Belt*'. In the eight categories listed under GB7(1)(a-h), category g) states the requirement that "*all of the following apply*" (my emphasis), including a):

the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

Analysis will show that the development proposal falls at the first hurdle.

The proposed development land was assessed as high-performing Green Belt land, not grey belt. Government advice (via PPG – Planning Policy Guidance) states:

Where grey belt sites are not identified in existing plans or Green Belt assessments, it is expected that authorities should consider evidence, in light of this guidance, on:

- whether the site strongly contributes to the Green Belt purposes a, b or d; and...*
- whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area, as set out in national policy and this guidance. (PPG Paragraph: 009 Reference ID: 64-009-20250225)*

Point 2 of Annex E (Green Belt assessments) of the new Framework is similar to the first bullet point above:

When making judgements as to whether land is grey belt, authorities should consider the contribution that assessment areas make to Green Belt purposes (a), (b) and (d).

Considerations for informing these judgements are set out below. 'The illustrative features' descriptions are drawn from paragraphs 3) and 4) of Annex E.

Because, as shown in Table 3 (overpage), the development site contributes strongly to both purposes (a) and (b) and therefore already fails the tests to accord with the definition of 'Grey Belt' land, assessment of purpose (d) is not considered necessary.



Despite clear evidence to the contrary, LDA insists that their Green Belt assessment *demonstrates that the Application Site does not strongly contribute to any of purposes (a), (b) or (d). Taken together with the conclusions in the Planning Statement in relation to footnote 7, the Application Site therefore falls within the definition of grey belt set out in Annex 2 to the NPPF.* (LDA paragraph 4.3.39)

In reality, it doesn't 'demonstrate', it simply asserts. LDA's methodology in arriving at the specious conclusions it is commissioned to arrive at is laid bare by the way it deals with the question of Merley and Canford Magna.

Contribution	PPG Criteria	Fulfilment of Criteria
Purpose A – to check the unrestricted sprawl of large built up areas		
	Illustrative features of GB parcels in question	Features of parcels PO21, PO23 and OA31
Strong	likely to be free of existing development	Yes. The entire site area consists of six agricultural fields.
	lack physical feature(s) in reasonable proximity that could restrict and contain development	Partially. River Stour would restrict northwards, but Magna Road would not restrict development southwards.
	be adjacent or near to a large built up area	Yes, as per the PGBR and SGBA, the Poole/Bournemouth conurbation, which includes Bearwood, is considered to be a large built-up area.
	if developed, result in an incongruous pattern of development (such as an extended "finger" of development into the Green Belt	Yes. The proposed development would protrude in a solid line of development from large built-up area of Bearwood /Bournemouth across open Green Belt land to Canford Magna in the west.
Purpose B - to prevent neighbouring towns merging into one another		
Strong	likely to be free of existing development	Yes, the entire site consists of open fields.
	forming a substantial part of a gap between towns	Yes, the open fields form an important gap between Beawood/Bournemouth and Merley/Canford Magna (a 'town' for GB assessment purposes) preventing coalescence.
	the development would be likely to result in the loss of visual separation of towns	The development would visually close the gap between Canford Vale western edge of Bearwood / Bournemouth and Canford Magna / Merley

Table 3. Fulfilment of PPG criteria for NPPF Green Belt purposes a) and b)



Merley a town?

The opening paragraph of Chapter 13 (Protecting Green Belt land) of the new Framework states that

The objective of Green Belt policy, as set out in this chapter, is to prevent urban sprawl by keeping land permanently open. The government attaches great importance to Green Belts, the essential features of which are their openness and permanence.

In a section under the heading of 'Towns', SGBA stated

With regard to Purpose 2, the following settlements were considered to form towns (see Table 3.2):

- *Merley combined with Canford Magna and housing at Merley Ways/Oakley Hill"* (SGBA para 3.2)

This is a decision which clearly causes some discomfort to LDA. Trying to magic away an inconvenient truth by saying it is not true, LDA assert in para 2.4.6 that

Merley is generally referred to as a village or 'large housing estate' online and the authors of this report found no reference or wider evidence, beyond the SGBA, to suggest that Merley should be considered a 'town'. Within the Poole Green Belt Review itself, despite treating Merley as a town, it is stated that:

"Merley, combined with Canford Magna and the isolated housing area at Oakley Hill/Merley Ways, is a built-up area within the Poole borough boundary and outside the Green Belt designation. This predominantly residential area is not a town....." (PGBR para 31)

In para 2.4.5 LDA say that

It is not clearly explained within the SGBA why Merley has subsequently been reclassified as a 'town' and the evidence for this.

It is, however, very clearly explained in PGBR (see below), from which SGBA took its lead. Despite this, LDA continue:

On this basis, Merley is not considered to be a town for the purposes of this Green Belt Assessment; and that Merley and Canford Magna – while located adjacent to each other – should be considered as separate settlements. (LDA para 2.4.8)

This is an extraordinary statement. Use of an incomplete sentence plucked from paragraph 31 of PGBR is a wilful misinterpretation, suggesting an intention to mislead. It is precisely because Merley / Canford Magna / Oakley is *not* a town that the paragraph continues with its explanation of why, within the terms of the Green Belt review, it *should* be regarded as a town. Of course there is no mention of it elsewhere as a town: the categorisation of it as a 'town' is very clearly explained in the paragraph: the purpose is to prevent coalescence, as required by NPPF Purpose 2.

For the avoidance of any doubt, and to correct LDA's wilfully misleading comments, I am quoting the whole of PGBR paragraph 31:



*Merley, combined with Canford Magna and the isolated housing area at Oakley Hill/Merley Ways, is a built-up area within the Poole borough boundary and outside the Green Belt designation. This predominantly residential area is not a town **but is separated from the larger built-up area of the conurbation by an area of Green Belt**. It is also separated from Wimborne Minster by an area of Green Belt designation. This issue was relevant for the assessment in terms of NPPF Purpose 2 that seeks to prevent ‘towns’ merging. **This wording raised ambiguity over how to assess the settlements such as Merley around which Green Belt existed and was effective in preventing coalescence**. Given that one of the original intentions of the South East Dorset Green Belt was **to maintain gaps between settlements (and not just towns)** the review has been carried out on the basis that NPPF Purpose 2 was applicable to the separate settlement of Merley/Canford Magna/Oakley Hill/Merley Ways. In other words, **Merley has been categorised as a town** for the assessment of parcels against Purpose 2 but is described as a separate settlement. (my emphases)*

LDA’s deliberate misreading of this paragraph is desperate stuff. If LDA were an ostrich, at this stage of the proceedings their feathered derrière would be high in the air and their head buried deep in the sand.

LDA believe that they have ‘addressed’ the issue fully and correctly, and this then enables them to reach the conclusion they want:

“As previously addressed, LDA Design consider that there is no evidence to suggest that Merley is a ‘town’. If Merley is considered to be a ‘village’, this purpose would not be of relevance to the relationship between Merley and Bournemouth, and the Application Site would make no contribution to Purpose (b) in respect of Merley.” (LDA 4.3.25)

This is an obtuse conclusion predicated on specious argument designed to mislead.

Existing Development

This is not the only example of a desperate pleading of case. Annex E’s criteria for fulfilment of Green Belt purpose’s ‘Strong’ contribution is that the land ‘is likely to free of existing development’.

On three occasions (paragraphs 4.1.9, 4.21 and 4.37) LDA’s submission says that the application site includes “elements of built development”: a telecoms mast, a small industrial shed and hard standing (remnant of the former golf course within the Application Site).

A glance at Figure 4 overpage does indeed show a ‘small industrial shed’ and some hard standing. (The telecoms mast is presumably a more recent addition, or is somewhat tiny.)

One wonders why LDA felt the need to stress the presence of ‘elements of built development’ when the application site appears so overwhelmingly agricultural in nature. The answer can be found in the following paragraph:

LDA Design acknowledge that the Application Site is largely agricultural in nature and is considered ‘open’ countryside. However, it does not have the distinctly rural character of the landscape to the north of River Stour. (LDA 4.3.33)



Clearly, the applicant wishes to downplay the Green Belt nature of the land and to distract from the fact that the application site is predominantly of an agricultural nature (six fields). The 'industrial shed' and surrounding agricultural land can be seen in Figure 4 below.



Figure 4. A Google Earth image showing the application site and its 'elements of built development'

Mind the Gap

If coalescence between the Bournemouth conurbation and the 'town' of Merley / Canford Magna is to be prevented – in accordance with the SE Dorset Green Belt – then a significant Green Belt gap must be maintained.

In an unusual concession, LDA says

It is accepted that any development within the Application Site would reduce the gap between Merley / Canford Magna and Bear Cross... (LDA 4.3.14)

Typically, however, the paragraph ends with an empty assertion:

However, a clearly defined gap would remain.

What does 'clearly defined' actually mean? How 'clearly defined' is the gap? How big is it in relation to the existing gap? Does it fulfil the purpose of preventing sprawl and preventing the merging of towns (and 'towns')?

Figure 5, overpage, from the applicant's Design and Access Statement, shows a significantly reduced gap. This is shown even more starkly in Figure 5, which suggests that, if the development were allowed, the gap would be reduced to 40% of what it is now.

BCP Urban Design Team's Consultation Response (9 July, 2026) summarises very effectively the detrimental effect the development would have:

The site forms part of an important green and open landscape at the edge of the conurbation. Its development, when considered alongside the approved and emerging developments at

North Bearwood (UE2), Canford Park and North of Merley (UE1), would contribute to an increasingly continuous corridor of urbanisation, with the built up area of Bournemouth and Poole extending towards Canford, Merley and Wimborne. The retention of meaningful separation between settlements is fundamental to maintaining local identity, landscape character and legibility.. (page 2)

A Connected Network (Fig. 5.3 from D and A Statement pt 2)

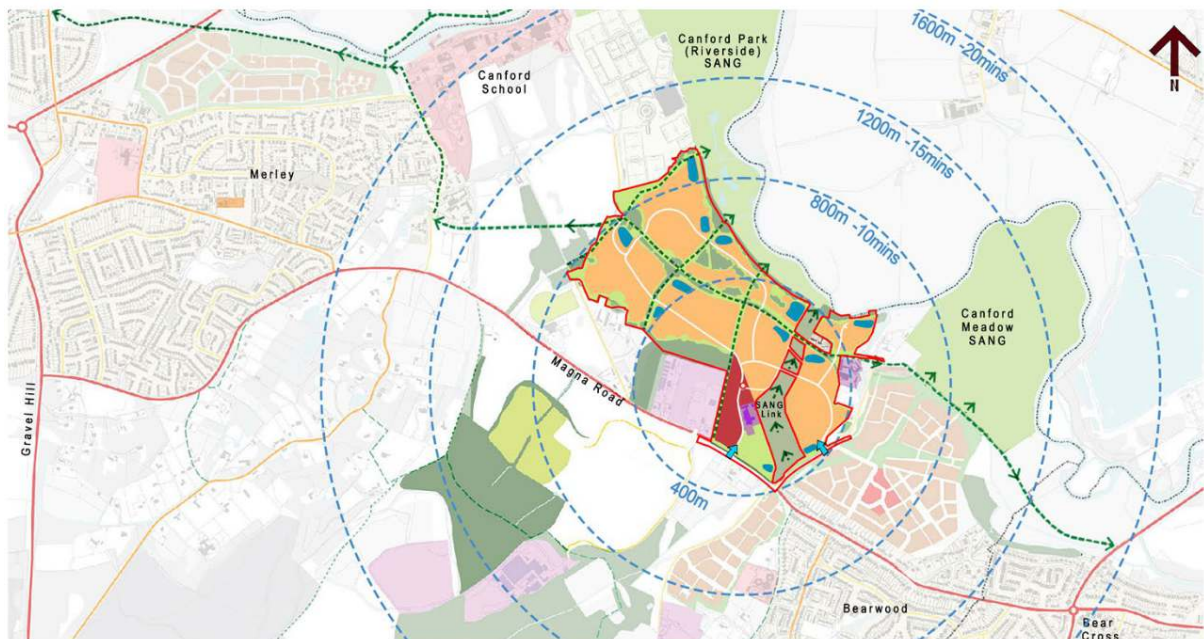


Figure 5. Plan from applicant's Design and Access Statement

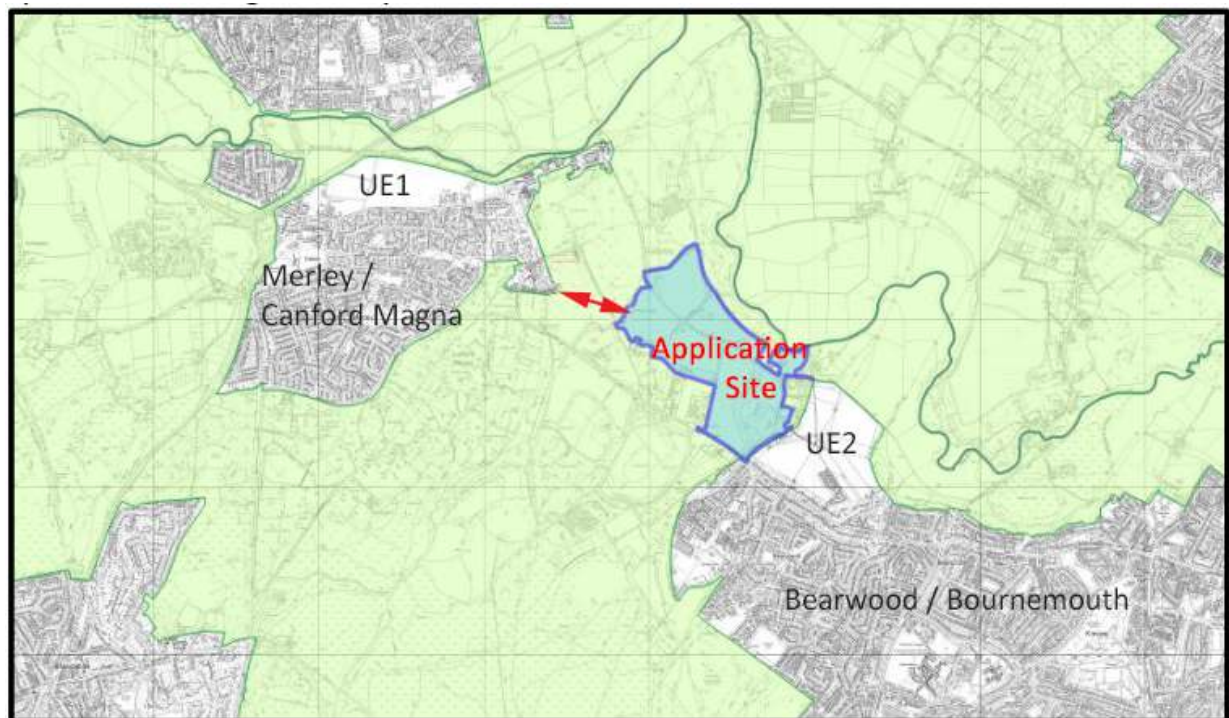


Figure 6. Proposed site Green Belt context, adapted from BCP's pre-application response to applicant

Paragraph 3 of Annex E – Green Belt purpose a) – asks whether a proposed development would

result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt).

The answer, as is clear from Figures 5 and 6 above, is yes, the proposed development would protrude in a solid line of development from large built-up area of Bearwood /Bournemouth across open Green Belt land towards Canford Magna in the west.

Predictable as ever, when presented with an inconvenient truth, LDA state, without any sense of irony:

Overall if the Application Site is developed, it is judged that it would result in a linear extension of development along Manga (sic) Road, but this would be broadly consistent with the prevailing settlement pattern and context. The Proposed Development would be contained by a range of strong physical features; relate well to existing settlement edge and surrounding urban land-uses; would retain an appropriate gap with Merley / Canford Magna; and would be broadly consistent with the existing pattern of settlement, roads, river and open spaces. (LDA 4.3.21)

It is precisely because it is ‘a linear extension of development along Magna Road’ that it significantly reduces the gap with Merley / Canford to an inappropriate degree.

The statement that ‘the Proposed Development would be contained by a range of strong physical features is also inaccurate. Two of these constraints are identified as the river and flood zone to the north (paragraph 2.3.16) and Magna Road to the south (paragraph 4.3.22). However, it should be noted that, in the eyes of WH White, Magna Road is not a constraint to the creation of Canford Garden Village. In the promotion for the original Call for Sites, CGV was on both sides of Magna Road. WH White’s future intentions are therefore very clearly signposted.

NPPF GB7(1)(g)(iii) Sustainable Development

As demonstrated above, the application site is not grey belt land, therefore NPPF GB7(1)(g)(i) does not apply to categorise the development ‘not inappropriate’. NPPF GB7(1)(g)(iv) / GB8 is not applicable because the land has not been released from the Green Belt.

However, LDA suggests that NPPF 155 (c) – now NPPF GB7(1)(g)(iii) – does apply. The sustainability of the application site is dealt with fully in Section 2 (page 19) of this submission, which examines the employment areas and transport issues related to the location of the application on the northern periphery of Poole.

Remaining Green Belt across the area of the local plan

Even if the site were considered to be grey belt, the application would fail because – as required by NPPF GB7(1)(g)(i) [formerly NPPF 155 (a)] and explained in PPG 008 Reference ID: 64-008-20250225 – an assessment would need to be made as to whether the proposed development would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the local plan, which clearly it would: if parcels of



land, with the high GB purpose assessments they have under two Green Belt reviews, were approved for a 1200 housing estate, then a precedent would be set and virtually no remaining parcels of land in the SE Dorset Green Belt would be safe from future development.

1.4 'VERY SPECIAL CIRCUMSTANCES'?

In the event that their arguments for having the application site re-assessed as grey belt fail, the applicants have a final card up their sleeve: 'Very Special Circumstances':

The applicants consider that very special circumstances, in line with paragraph 153 of the NPPF, would outweigh any found harm. (Planning Statement paragraph 9.62).

In the new Framework, paragraph 153 becomes GB6(2). Whilst there are some minor word changes, the two versions are materially the same. GB6(2) states that:

Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Such circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposed development, is clearly outweighed by other considerations. In making this assessment, substantial weight should be given to the harm to the Green Belt which would be caused, including harm to its openness.

The August 2026 Framework adds a further hurdle to be negotiated by the applicant. Policy S5 represents a new emphasis in the 2026 Framework and has no direct equivalent in its predecessor. Should it be decided that the requirements of GB6(2) are met, that Very Special Circumstances apply, and that the application is therefore not inappropriate development, the final sentence of policy S5(5) is engaged.

S5(5) provides that development which is not inappropriate in the Green Belt

*'should be approved **unless the benefits are substantially outweighed by adverse effects**', assessed against the national decision-making policies and applying S5(2).*

S5(2) states,

*In applying this policy, the circumstances in which the benefits of approving development proposals are likely to be substantially outweighed by adverse effects include, but are not restricted to, **situations where the development proposal would fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.***

Housing need

The applicant's argument for Very Special Circumstances hinges on housing need within BCP. According to the Planning Statement (9.113):

Where acute housing pressures persist, and where sustainable development can be achieved without undermining the core purposes of land designation, the case for release under 'very special circumstances' becomes compelling.



Magwatch understands the need to build many more houses. However, it has reservations about the formula which produces BCP's housing targets, believing that insufficient weight is given to the constraints within BCP (an authority bounded in the south by the sea, in the north and to the east by floodplains, has in its central areas significant stretches of protected heathland, and has a transient student population). It believes, further, that housing developments should be built in the right places and with the appropriate infrastructure. The application site is not the right place.

Whilst it is true that 'housing pressures persist', they are not so acute as to require the further release of Green Belt land in the Bearwood and Merley ward. If they were, BCP would have allocated WH White's promotion as part of the draft of its local plan, completed in 2024 and subsequently withdrawn in 2025. The fact that it did not suggests that BCP had in mind the allocation of other development sites to meet their housing target.

Assessment of Harm to Openness of Green Belt

The SGBA of 2020 provides an assessment of the potential harm to the Green Belt of releasing land for development. The assessment of potential harm follows on from the initial assessment against the Green Belt purposes and considers the loss of contribution from the release of land and the impact of release on adjacent Green Belt; the assessment combines these factors to define the harm to Green Belt purposes. It utilises a seven-point scale ranging from Very High harm to Very Low/No harm.

The SGBA's assessment of the Green Belt application site's parcels of land is not helpful at all to the appellant and indeed would stop the application dead in its tracks. Therefore, LDA decided to do their own assessment, moving the proverbial goal posts (and, indeed widening the goal considerably). LDA justify this by saying that the SGBA assessment

provides a general judgement regarding the release of parcels for development and is not based on specific proposals. As such, the SGBA's assessment of harm is utilised for reference only...

whilst LDA's assessment

considered the specific impacts of the Proposed Development on the Green Belt." (LDA 5.3.5)

Table 5 below shows the glaring contrasts in the harm ratings.

Settlement	Release Scenario	SGBA Harm Rating	LDA Harm Rating
Poole	Release of PO-OA31 as an expansion of Poole	Very High	Moderate
Poole	Release of PO21 as an expansion of Poole	High	Minor-Moderate
Poole	Release of PO23 as an expansion of Poole	High	Minor

Table 5. Release scenario harm ratings



Predictably, LDA's harm ratings provide the results that their client wants to hear, rather than bearing any relation to reality.

Openness

NPPF GB6(2) draws attention to harm to the openness of the Green Belt. It should be noted, also, that the opening paragraph of Chapter 13 (Protecting Green Belt land) of the new Framework states that

The objective of Green Belt policy, as set out in this chapter, is to prevent urban sprawl by keeping land permanently open. The government attaches great importance to Green Belts, the essential features of which are their openness and permanence.

According to PPG advice, relevant matters, when considering the potential impact of development on the openness of the Green Belt, include:

- *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness*
- *the degree of activity likely to be generated, such as traffic generation (PPG ID: 64-013-20250225)*

The development, if approved, would be likely to be in perpetuity. So *remediability* is not at issue here.

The *degree of activity* likely to be generated in the 1200 house development, given its size and the proposed elements of its infrastructure, is likely to be considerable. Unless the development, if and when completed, were completely self-contained, with no need for anyone ever to venture in or out, the following comment about 'degree of activity' is nonsensical:

From within the wider green belt, there is likely to be little discernible sense of additional activity, with vehicles and pedestrian movements largely be contained by the extent of existing vegetation, roads and buildings within and adjacent to the Application Site boundary. (LDA 5.4.12)

Existing Openness

LDA states that

the Application Site comprises six agricultural fields and as such would be described as 'open' countryside. (LDA 4.2.1)

However, it qualifies this a few paragraphs later:

Overall, it is judged that the Application Site does not contribute significantly to the perceived spatial or visual openness of the Green Belt. (LDA 4.2.6)

This apparent uncertainty of mind continues, with an admission of loss of spatial openness:



Built development would occur across a large part of the Application Site area, comprising building footprints and hard standing/structures (i.e. walls, fences, street furniture, lighting columns etc). This would be a fundamental change to the land use of the Application Site and would result in the loss of spatial (physical) openness within the Application Site itself. (LDA 5.4.1)

Magwatch's submission does not critique the applicant's LVIA. However, Magwatch agrees with the objection of 8 July of David Brook, posted in the planning portal, which identifies very clearly the shortcomings of the LVIA. These include an unrepresentative choice of viewpoints, some poorly framed photographs from some viewpoints, an overstatement of the effectiveness of vegetative screening and an understatement of some the 'significant effects' of the proposed development on important residential receptors.

Visibility

LDA claims that

Visibility of the Proposed Development from the adjoining Green Belt landscape would be limited by the extent of existing vegetation, roads and buildings within and adjacent to the Application Site boundary. (Paragraph 5.4.3)

This is not strictly true, as is clear from earlier paragraphs of LDA's assessment. In paragraph 4.1.25 LDA admit that

To the east / south-east, there would be relatively open views from Knighton Lane, Magna Road and the outer edges of the Canford Park and Canford Vale (Provence Drive) residential areas

and

To the south, there would be glimpsed and/or filtered views from Canford Magna Garden Centre / Canford Business Park; the residential area along Moortown Drive; and the Hamworthy Club

and in the following paragraph

There would also be visibility and relatively open / uninterrupted views from publicly accessible location within the Application Site, namely the Canford Park SANG link and Stour Valley Way. (4.1.26)

Fig. 7 (overpage) shows a view from the Stour Valley Way of one of the fields of the application site.

A large, 1200 home development sitting alongside the Canford Park SANG and through which the Stour Valley Way (Footpath 29) would run is not consistent with aims and intention of either the SANG or the Stour Valley Way,

The Canford Park SANG was created to provide an alternative public amenity to Canford Heath. The 'Guidelines for the quality of SANG' section in *The Dorset Heathlands Planning Framework 2020-2025 SPD* (April 2020) state that



‘the open or semi wooded and undulating nature of most of the Dorset Heathland sites gives them an air of relative wildness’

and suggests that

‘SANGs must aim to reproduce this quality.’ (p27).



*Figure 7. The view from Stour Valley Way, as marked by red dot in accompanying map.
The houses seen are part of Moortown Farm. [Photo taken on 20 July 2026.]*

According to The Stour Valley Park Strategy Document (October 2022),

The Stour Valley Park is a vision for a regional park where everyone can enjoy the benefits of the natural world. Creating this park is about making amazing places for people and wildlife; a landscape for the common good.

The sense of 'the natural world' would be lessened in this stretch of the Stour Valley Way and the SANG's 'air of relative wildness' would be diminished if the development were approved.



Figure 8. South-facing view of development site [Google Earth]

Much is made in Sections 4 (Baseline Green Belt Assessment) and 5 (Effects on Green Belt) of screening vegetation. The word 'vegetation' occurs 29 times in these two sections. What is not stated, but is a fact, is that, whilst there are some conifers in the area of and around the application site, most of the 'screening' trees are deciduous and would not offer year-round screening of the development site.

In paragraph 5.4.7 LDA claims that

Overall there would be little change to the visual aspects of openness from within the wider Green Belt beyond the Application Site boundary and immediate site context.

This is an extraordinary claim to make given that the proposed development's 56.75 hectare site would reduce the Green Belt gap between Bearwood and Canford Magna / Merley by 60%.

Other Harms: Ecological Harm

As the applicant has acknowledged in their own Planning Statement, this area has known issues relating to nearby designated Habitat Sites, and Natural England have confirmed that the development site is considered to be 'functionally linked land' (i.e. land outside a SSSI/SPA site that is functionally important for the mobile species for which the Protected Sites are designated, which in this case is the Nightjar). Whilst it is correct to say that there

might be opportunities for appropriate mitigation, the possibility of effective mitigation would depend upon the severity of the impact, the quality of the habitat and the availability of alternative habitat provided.

The applicant's claim that

whilst the site lies within the wider foraging range of Nightjar and therefore constitutes FLL in principle, the severity of impact is low (Planning Statement, para 9.14)

is not proven.

Until such time as the LPA's own Appropriate Assessment is conducted and suggests otherwise, the loss of foraging habitat for the Nightjar must be deemed an ecological harm.

1.4 CONCLUSION

The Green Belt land on which the proposed development would be build fulfils NPPF Green Belt purposes a) and b) to a high level. None of the possible exceptions a) to h) of NPPF GB7(1)(g) can be applied. The land is not grey belt and the site is not in a sustainable location so NPPF GB7(1)(g)(i) cannot be applied. The proposed development would do a high degree of harm to the openness of the Green Belt and would harm the ecology of land which lies in close proximity to Canford Heath, an SSSI. The 'other considerations' do not outweigh the harms, therefore NPPF GB6(2)'s 'Very Special Circumstances' cannot be applied; and it fails the bar required by NPPF S5(5). The application should therefore be refused.

2. TRANSPORT ASSESSMENT

The methodology of the Transport Assessment

SLR's Transport Assessment ("SLRTA") of February 2026 adopts a 'vision-led approach' to traffic planning rather than a 'predict and provide' approach. A vision-led approach is based upon *desired* outcomes rather than realistically predicted outcomes. In other words, assessment outcomes are modelled on desired targets rather than being based on actual likely behaviour. Arguably, therefore, it is of somewhat limited value when planning for *actual* future road use.

The Unreliability of the TA's methodology and claims

SLRTA paragraph 3.6 states

'Following best practice, SLR has undertaken a practical assessment of accessibility by sustainable modes. This Active Travel Assessment (ATA) explains how the proposed development at Canford Garden Village would be accessible by active modes of transport including walking and cycling. Active Travel England (ATE) guidance has been referred to as part of this assessment.'



However – and strangely in the light of the claims made in the above paragraph – Active Travel England (“ATE”) appear unhappy with SLR’s Transport Assessment and amongst several recommendations have suggested that SLR

Submit an improved Transport Assessment (TA) with a robust, transparent, and fully justified multi-modal evidence base. (Active Travel England consultation response, 27 June 2026, para 1.3)

In paragraph 2.3 ATE suggests that the applicant’s TA
provides an unclear and insufficient evidence base, with outputs that lack credibility

Unreliability and lack of credibility are also central themes of transport consultancy Railton TPC Ltd’s comments on the applicant’s TA. [***A copy of Railton’s letter to Magwatch can be found as an appendix to this submission (page 28).***]

Of particular note are the following comments made by Railton:

- The proposed development is not in an inherently accessible location because it sits on the northern fringe of the main urban area and is not well connected to any main service centres.
- On the basis of SLRTA Table 7.3. Railton calculates that the predicted external vehicle trip generation rates for the proposed development “are extremely low, particularly for a site so poorly related to services and facilities”.
- Railton contests SLR’s claim in TA para 7.7 that the [vision-led] Tool “has been used to assess multiple developments across the UK and has been approved by relevant Highway Authorities.” Making reference to the Penwortham Decision and the Monkton Heathfield application, Railton concludes that the Tool is “not tested and cannot be uncritically accepted as a reliable basis for assessing transport impacts.”

‘The 20-minute neighbourhood’

A consequence of the idealistic rather than practical nature of the ‘vision-led’ approach is that it lends itself to highly optimistic predictions.

‘The TA identifies a significant opportunity to create a thriving and desirable destination to live and work in, supported by new pedestrian and cycle networks, increasing productivity and delivering homes in a new, attractive community. The Vision is focused around placemaking, building on the principles of well-designed places (National Design Guide 2021) and the concept of the 20-minute neighbourhood.’ (SLRTA para 1.8)

However, the 20-minute neighbourhood, with its interconnecting pedestrian and cycle networks, places a heavy reliance on there being extensive employment opportunities within that neighbourhood. When the main employment areas lie some miles away, the new neighbourhood becomes a dormitory settlement rather than the self-contained community of the ‘vision-led’ approach. Travel to work requires some kind of transport: a rail or tram network, an efficient bus network, or the car. There is no rail network in north Poole, there



are no dedicated bus lanes on the A349 to Poole or the A341 to Bournemouth. Instead there is a known reliance on travelling to work by car.

Managing Traffic Congestion: Modal Shift

The foreword of the current Local Development Plan, the Poole Local Plan of 2018, states that *'managing traffic congestion'* is a key requirement to help accommodate growth. It pledges to provide

'a package of measures to improve accessibility to services through encouraging better travel choices.'

The package of measures can be summarized as the 'modal shift' from car travel to walking, cycling and bus usage. Put simply the modal shift is a desired rather than prescribed behavioural change in the way people travel. However, two factors render this ambition untenable with the proposed application. The first of these is site location, the second the nature of the surrounding road network.

Site Location

The proposed development is located on the north western periphery of BCP, six and a half miles from Bournemouth and over six miles from Poole. It is more than likely, therefore, that most of its residents will have to travel some miles to their places of work. This is a fact that was recognised when the two urban extensions, Land North of Merley (UE1) and Land North of Bearwood (UE2) were allocated in the Poole Local Plan of 2018.

Responding to the application for UE1 (APP/19/00955/P) the Dorset Police submission of September 2019 made the point that the Council policy to reduce dependence on single car travel, was 'still aspirational' and that

'the reality is that due to the distance from the main employment areas of Bournemouth and Poole, a great number of residents will have cars, and may continue to use them. This could place a strain on the infrastructure.'

The implications of the peripheral nature of the sites were spelled out also by BCP Highway Authority's own submission of November, 2019 – a review of the applicant's Transport Assessment conducted by BCP's transport consultants, WSP – which, in paragraph 3.2, noted that the site's location constituted a severe challenge to a significant modal shift, a prerequisite to fulfilling Poole Plan Policy 10:

'The main employment centres are identified as the urban areas of Poole, Bournemouth and Christchurch, which fall outside of comfortable walking and cycling journey times.'

Since that time Canford Paddock (324 homes) has been built out and Oakwood Park (UE1 – 550 homes) and Canford Vale (UE2 – 695 homes) are under construction. All the evidence is that the predictions of very little change in car use were accurate and continue to be so.

The most recent comment on the relevance of the site's location comes from the BCP's Urban Design Team, in their submission of 9th July 2026:

'Furthermore, concerns remain regarding the overall suitability and sustainability of the site... The Urban Design Team has consistently raised reservations about the location of a



development of this scale, noting its distance from established town centres, reliance on Magna Road, limited public transport accessibility and the likelihood of car dependency.' (Page 3)

Significantly, Appendix F of the SLRTA ('Appendix F Vision Led Tool Outputs') confirms that the main areas of employment are not close by:

'Distance from the centre of the proposed development site to the closest existing Amenities: Nearest Large Scale Employment (e.g. town centre / business park) – Bournemouth City [sic] Centre: 6.6 miles (SLRTA pdf page 206)

Distance distribution of employment trips generated from the proposed site include the following statistics:

Proportion of employment trips 2 to 5 miles from site	45.6%
Proportion of employment trips 5 to 10 miles from site	21.7%

(SLRTA pdf page 207)

Car use is predicted as follows:

Final base Modal Share based on household types, local conditions and existing amenity provision		Excluding walking trips for pleasure / fitness
Walk	25%	17%
Bicycle	2%	2%
Car/van driver	44%	49%
Car/van passenger	25%	28%

(SLRTA pdf page 208)

A note on Bus Travel

Given the lack of dedicated bus lanes on the relevant routes into Poole and Bournemouth, bus journey times render a significant shift from car travel to bus travel highly unlikely. A peak time journey between the proposed development and Poole town centre is likely to take between 50 minutes and 1 hour 10 minutes and to Bournemouth town centre between 1 hour and 1 hr 20 minutes. Given that this is between two and three times longer than a car journey made at the same time, it would seem to be a no-brainer that most people would choose to travel by car, as indeed proves to be the case currently. It is a matter of straightforward logic: bus services which use the same congested lanes as the car *will not* persuade residents to commit to a modal shift, even with a more frequent bus service.

It is worth noting the declining trends in bus usage nationally. The Independent Transport Commission's study, *The Shape of Changing Bus Demand in England* (January, 2020), used National Travel Survey data to examine trends. It notes that

‘bus use outside London has seen a significant decline over the past decade’ and that ‘in the longer term, the fall in bus patronage is even starker, with local journeys in Britain down more than 60% since the heyday of the bus in 1960’.

It is well-known that there is a strong inverse relationship between car ownership and bus usage. Studies by KPMG on bus patronage in England and Scotland (Transport, KPMG, September 2018) have suggested that the growth in car ownership has been the greatest negative factor depressing bus usage, followed by worsening bus journey times.

A non-sustainable location

LDA claim that NPPF 155 (c) can be applied to the application site:

‘The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

... c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework .’

GB7(1)(g)(iii) of the new Framework reads

The development would be in a sustainable location, with particular reference to policy TR3 of this Framework

which is substantively the same as Paragraph 155 (c) of the 2024 framework.

Paragraph 110 of former framework, is echoed by TR3(1)(a) in the new framework, which requires that development proposals should

‘limit the need to travel, particularly by private car, and offer a genuine choice of transport modes for residents and users, unless the nature of the development would make this impractical.’

TR3(1) states:

‘So that development is located where it can support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure, development proposals should reflect the following principles, taking into account the vision for the site, the type of development and its location.

The important attributes of a sustainable location include the requirement to:

- limit the need to travel [TR3(1)(a)];
- offer genuine choice of transport modes [TR3(1)(a)];
- utilise existing or proposed transport infrastructure [TR3(1)(b)];
- mitigate to an acceptable degree significant adverse impacts [TR3(1)(c)];
- provide a transport statement or assessment which is proportionate to the nature and scale of the development [TR6(1)];
- Provide a travel plan which includes “fallback options if initial measures do not deliver the expected outcomes” [TR6(2)].



Table 4 below offers a brief assessment of how the application site fulfils the attributes of a truly sustainable location.

Attributes of a Sustainable Location	Application Site
The need to travel is limited	No. The main areas of employment are Bournemouth and Poole, over six miles from the application site.
There is a <i>genuine</i> choice of transport modes	A genuine choice of transport mode would require a regular, efficient and quick bus service. This is not the case. There are no bus lanes on the A341 or A349.
Developer should utilise existing or proposed transport infrastructure	No significant proposals for improvement to Magna Road or to the junctions at either end are proposed. It is difficult to 'utilise' a congested and over-capacity road network.
Developer should mitigate to an acceptable degree significant adverse impacts	The Transport Assessment downplays significant adverse impact and offers little in the way of mitigation.
Transport modes should take into account type of development and its location	SLR's Transport Assessment fails to take into account the semi-rural location of the application site, with its continued dependence on the car. Its speculative and unrealistic modelling fails to offer a genuine choice of transport modes.
A transport assessment which is proportionate to the nature and scale of the development should be provided	The TA downplays the location of the proposed development (part of its 'nature'). Occupants' need to travel by car is ignored. Therefore the TA is not 'proportionate'.
Provide a Travel Plan which includes "fallback options if initial measures do not deliver the expected outcomes"	Perhaps because the transport modelling has predicted unrealistically optimistic outcomes, there appear to be no 'fallback options' in the Travel Plan.

Table 4. Application site and attributes of a sustainable location

BCP's Urban Design department raised concerns about sustainability in their pre-app Consultation Response of 29 January 2026:

Introducing up to 1,200 homes in a location remote from town centres raises significant concerns regarding site suitability and long-term sustainability. (page 3)

Note on Electric Vehicles

Paragraph 9.28 of the Planning Statement states that

For those trips which do require use of the private car, the site will provide electric vehicle (EV) charging infrastructure to facilitate and encourage the UK's rapid ongoing transition to



EVs – a mode of transport defined as sustainable in the NPPF.

Given this ‘rapid ongoing transition’ and the sustainable mode of EVs, it is strange that no infrastructural improvement is being suggested for the Bear Cross roundabout.

Local Road Network

The major junctions at each end of Magna Road – the Gravel Hill traffic lights and the Bear Cross roundabout – have been at or close to capacity for some years; (See comment of Lee Smith, of BCP Highway Authority, on page 27 below.)

Table 8.9 below (from para 8.34 of SLRTA) shows the ARCADY modelling results:

Table 8.9: Bear Cross Roundabout ARCADY Results Summary

Arm	Road	AM Peak (0800-0900)			PM Peak (1700-1800)		
		Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
2036 Baseline							
A	Ringwood Road N	3	14.37	0.77	26	88.06	0.98
B	Wimborne Road	29	151.36	0.99	36	189.09	1.01
C	Magna Road	2	5.65	0.61	2	7.14	0.70
D	Ringwood Road S	4	15.87	0.79	4	15.91	0.80
2036 Baseline + Development							
A	Ringwood Road N	5	19.88	0.83	63	196.83	1.02
B	Wimborne Road	95	488.34	1.09	76	390.21	1.07
C	Magna Road	2	5.75	0.62	3	8.34	0.74
D	Ringwood Road S	8	31.48	0.90	5	19.79	0.84

The table makes stark reading, with an indication of overcapacity at the Bear Cross roundabout even before the two urban extensions of UE1 and UE2 are built out and even without taking into account the proposed development. However, as so often when applicants are confronted with an inconvenient truth, the immediate response is to downplay the potential problem. SLRTA para 8.37 informs us that models such as ARCADY do not accurately predict the effects of queuing and delay in over-capacity scenarios and instead

‘tend to exponentially overforecast queues and delays after junctions reach capacity.’

This seems to be an explicit admission of the severe limitations of SLR’s vision-led modelling tool.

SLRTA para 8.38 makes the conjectural and unconvincing claim that

‘The likelihood at a junction such as this, is that the demand and queueing will not increase in the way the model predicts, because people will act to minimise their own inconvenience.’

This is a point echoed in the applicant’s Planning Statement:

‘The likelihood at a junction such as this, is that demand and queueing will not actually significantly increase because people will act to minimise their own convenience (sic) by switching transport modes and retiming journeys.’ (Planning Statement, 9.28 d)



These are bold, unprovable and unlikely predictions. As the TA admits, behavioural change (or lack of it) is, of course,

‘something the model cannot account for’ (SLRTA para 8.38).

However, as stated above, the location of settlements in north Poole presents a real challenge to any meaningful behavioural change or modal shift.

The following two paragraphs from the applicant’s Planning Statement should be treated with caution, or perhaps more properly with outright scepticism:

‘The site is located adjacent to the A341 Magna Road, which is considered by the applicants to be capable of being called a sustainable transport corridor, benefitting from significant recent investment through the Transforming Cities Fund.’ (Planning Statement 10.2)

‘It is recognised that investment through the Transforming Cities Fund has delivered significant improvements along Magna Road, helping to enhance conditions for sustainable modes of travel and supporting a shift away from private car use.’ (Planning Statement 8.91)

It is true that the site is adjacent to the A341 Magna and that it has benefited from significant recent investment through the TCF. It is true, also, that cycleways have been made along Magna Road which theoretically support ‘a shift away from private car use’. However, the shift away from car use has not materialised and the cycleways remain largely unused. Therefore it is not really accurate to suggest that Magna Road can, in any practical way, be called a ‘sustainable transport corridor’.

The simple expedient of direct observation rather than desktop modelling gives witness to the following during peak traffic hours:

- the actual high number of cars exiting and re-entering the built out /under-construction Canford Paddock, Canford Vale and Oakwood Park;
- the barely used cycleways built at considerable expense from the *Transforming Cities Fund*; and
- the sparsely filled buses travelling to and from Poole and Bournemouth.

BCP was warned against predicating the allocation and approval of its two urban extensions on the basis of modal change. This is not a mistake that BCP should repeat with the proposed development of 1200 houses.

Mitigation

Increasing delays, longer journey times and reduced average vehicle speeds on account of the proposed urban extensions were problems anticipated in the Planning Inspectorate’s Report to Borough of Poole in November 2018, which stated, in relation to the two urban extensions, that

‘the scale of development proposed would be likely to result in a noticeable increase in traffic in the Merley and Bearwood areas, locations which, like most of the Borough, already experience traffic congestion.’ (para 70)



Therefore,

'Importantly, policy PP10 appropriately requires that, in conjunction with measures to be implemented by local authorities, the developments must provide suitable mitigation to address unacceptable impacts on the highway network.' (Planning Inspectorate's Report para 70)

The mitigation chosen depended upon, as stated above, a misguided reliance on a significant modal shift, a fanciful wish rather than a realistic prediction.

By the time the application for UE2 (APP/19/00237/P) came before the planning meeting (18 March, 2021), there was a stated acceptance by BCP of increasing traffic congestion on Magna Road, with no mitigating infrastructural modification planned for the Bear Cross roundabout. When asked about increased road usage by a member of the planning committee, Lee Smith of BCP's Highway Authority, stated:

With regards to general traffic congestion it is right to say that both junctions at either end of Magna Road, at top end of Bear Cross roundabout and Queen Anne Drive are at capacity or close to capacity at the moment... On a wider point of view, we accept from a Highways point of view that this proposal [for Poole Plan UE2, Land North of Bearwood] will lead to extra congestion... We at the Highway Authority are not saying there won't be congestion as a result of this proposal. It is when we look at what is that congestion, so if you are approaching Bear Cross roundabout you will queue at the moment and those queues will lengthen as a result of the development, so effectively people will be queueing longer and taking longer to get to work. (Transcribed from YouTube recording Planning Committee meeting)

This blunt admission seems to be squarely at odds with Poole Plan Policy 10 h) which requires *'wider strategic mitigation measures to be implemented by local authorities'* and *'suitable mitigation to address unacceptable impacts on the highway network'*

TR6(4) of the 2026 NPPF states:

Development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts)... taking into account any mitigation measures proposed as well as any wider network improvements"

Conclusion

Given the SLR's own predictions, and discounting their sleight of hand dismissal of their own prediction, it is clear that no infrastructural mitigation is planned, that modal shift mitigation is a pipe dream and that, therefore, residual cumulative impacts on the road network will be severe. The application should therefore be refused.

Frank Ahern

(on behalf of Magwatch)

16 September 2026



Magwatch
c/o Mr F Ahern

20 July 2026

Dear Mr Ahern,

LAND NORTH OF MAGNA ROAD, POOLE: App. Ref. P/26/02365/OUT

As you know, I am Director of Railton TPC Ltd and have worked for 35 years in the transport planning industry. I have dealt with the transport and access arrangements for a wide range of development types from local to strategic scale and have been involved with numerous transport studies for public and private sector clients. I have given evidence at informal hearings and public inquiries, participated in Local Plan Inquiries and Examinations of Nationally Significant Infrastructure Projects (NSIPs).

I have undertaken a review of the Transport Assessment (TA) (SLR, February 2026) that accompanies this application.

My initial comment is that the proposed development is not in an inherently accessible location. It sits on the northern fringe of the main urban area and is not well connected to any main service centres.

I see that the applicant is using the *Vision-led Planning Tool* (The 'Tool') to derive trip generation rates. From Table 7.3 of the TA, I calculate that the external vehicle trip generation rates for the proposed development are equivalent to 0.23 vehicle trips per dwelling in the AM peak hour and 0.21 vehicle trips per dwelling in the PM peak hour. These are **extremely low**, particularly for a site so poorly related to services and facilities. The rates are less than half I would expect, even with the implementation of a comprehensive set of measures to support and encourage sustainable modes.

It should be remembered that the vision-led approach is not intended to encourage naive optimism but to secure development that is genuinely sustainable in transport terms. The proposals represent 'business as usual' with nothing to distinguish them from other large edge of town mixed-use schemes that, as demonstrated by observations, lead to largely car-dependent development. The proposals, as they stand, include nothing that would suggest a step-change in transport sustainability.

Paragraph 7.7 of the TA states:

'In summary, the Vision-led Planning Tool provides estimates of the trip generation (distances and modes) for any residential scheme, considering the location, scale, housing mix, and importantly combination of on-site amenity provision and planned mobility interventions. This is consistent with the requirements of the NPPF and with the approach advocated in appeal decisions including the aforementioned Penwortham decision. The Tool has been used to assess multiple developments

across the UK and has been approved by relevant Highway Authorities. This includes at Monkton Heathfield Phase 2, a site in Taunton, Somerset, for mixed-use development including circa 1,500 dwellings'.

The Penwortham Decision (also known as Pickerings Farm) (South Ribble Planning application refs. 07/2021/00886/ORM and 07/2021/00887/ORM and appeal refs. 3295498 and 3295502) relates to a judgement as to whether there would be a severe impact on the highway network. It does not relate, in any way, to the Tool that SLR has used in the case of Land north of Magna Road.

The Monkton Heathfield application (Somerset Council application ref. 14/21/0047) is yet to be determined and I can find no written evidence on the Somerset Council planning portal that the Highway Authority has accepted the methodology applied by SLR to be robust. I would have expected SLR to attach correspondence from Somerset Council confirming the acceptability of the approach if this were available.

Given that these are the only two references that the applicant is able to provide to support the acceptability of the approach, **I conclude that it is not tested and cannot be uncritically accepted as a reliable basis for assessing transport impacts.**

I trust the above is clear. Please do not hesitate to contact me if you have any queries.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "BR Bamber", with a long horizontal flourish extending to the right.

Bruce Bamber BSc MA MSc MCIHT, Director