

TECHNICAL NOTE

Proposed Residential Development
by Countryside Partnerships PLC
Land South of Henham Road, Elsenham

Section 62a Planning Application Ref: S62A/22/0007

Transport Objections

Elsenham Parish Council
September 2022

1 INTRODUCTION

- 1.1 This technical note has been prepared following a review of the applicants Transport Assessment report (TA) prepared by Ardent Consulting Engineers and the associated traffic Modelling Impact Assessment Report, prepared by Modelling Group (included within Appendix K of the TA). The Framework Travel Plan (FTP) has also been assessed.
- 1.2 Having completed the review of the technical documentation supporting the planning application, there are two key areas of concern which underpin the Parish Council's transport objections to the proposed development.
- 1.3 The first is the cumulative impact of incremental traffic growth on the surrounding road network and the adverse impacts this creates; particularly in Stansted Mountfitchet. The second relates to the lack of adequate services and facilities and limited public transport accessibility within Elsenham, meaning that the proposed development is reliant on car journeys and fails to comply with sustainable transport objectives.

2 TRAFFIC IMPACTS

Housing Growth – Completed Development

- 2.1 Elsenham has experienced significant growth in housing numbers in recent years. Table 1 shows the amount of completed/occupied development in Elsenham over the past 10 years.

Table 1 – Completed Development in Elsenham

Development site	Permission date	Number	UDC Reference
The Orchard Station Road Elsenham	10/08/2012	53	UTT/2166/11/DFO
Land South Of Stansted Road Elsenham	05/02/2016	165	UTT/15/2632/DFO
The Old Goods Yard Old Mead La Elsenham	07/02/2014	10	UTT/12/6116/FUL
Land at Alsa Leys Elsenham	17/03/2014	6	UTT/13/2836/FUL
Land Adjacent Hailes Wood Elsenham	23/07/2014	32	UTT/13/2917/FUL
Land north of Stansted Road Elsenham	01/05/2015	155	UTT/14/3279/DFO
Hailes Wood	09/12/2015	3	UTT/15/1121/FUL
Land North Of Leigh Drive Elsenham	14/11/2016	20	UTT/15/3090/OP
Elsenham Nurseries Stansted Rd Elsenham	06/07/2017	42	UTT/17/0335/DFO
	Sub Total	486	



2.2 The nearby village of Henham, located one mile north of the proposed development, is accessed via Elsenham and is reliant on the same highway network. This village has also grown in dwelling numbers, as shown in Table 2.

Table 2 – Completed Development in Henham

Development site	Permission date	Number	UDC Reference
Billy's Barn	Sep-12	1	UTT/12/5299/FUL
Mill Road	Dec-12	3	UTT/12/5180/FUL
Station Development	Feb-14	10	UTT/12/6116/FUL
Field View	Feb-14	16	UTT/14/0065/FUL
White House	May-14	1	UTT/14/0725/FUL
Blossom Hill Farm	Oct-14	21	UTT/14/2655/FUL
Caldicot	Apr-15	1	UTT/14/1009/FUL
Station pt 2	Jul-15	6	UTT/15/0362/FUL
Cott Moor	Aug-15	1	UTT/15/1868/OP
Chickney Road	Aug-15	2	UTT/15/2677/FUL
Henley's	Nov-15	1	UTT/15/2686/FUL
Chickney Road	Sep-16	9	UTT/16/1988/FUL
Wyndies Crow Street	May-17	2	UTT/17/0447/FUL
	Sub Total	74	

2.3 The above tables confirm a combined total of 560 units built and occupied in the Elsenham area over the last ten years.

Housing Growth – Committed Development

2.4 A substantial amount of additional growth will occur in the near future due to a number of committed developments, which have planning permission but are not yet built/occupied. These are summarised in Table 6.1 of the applicants TA and reproduced in Table 3 below, (see next page).

Table 3 – Committed Development Sites (Source: ACE Transport Assessment Table 6.1)

Committed Development Scheme	Source
Trisail – 3 office blocks with GFA of 6969sqm (UTT/11/1473)	Flows extracted from E Elsenham site (UTT/17/3575/OP)
Land West of Hall Road, Elsenham – 130 dwellings (UTT/13/0177 at the time of assessment but since approved under UTT/19/0462/FUL)	Flows extracted from E Elsenham site (UTT/17/3575/OP)
Magna Carta School – 7 FE primary school (UTT/17/0052)	Flows extracted from E Elsenham site
Elsenham Primary School Expansion from 1FE to 2FE (UTT/17/2594)	Flows extracted from E Elsenham site (UTT/17/3575/OP)
Land South of Rush Lane, Elsenham – 44 dwellings (UTT/19/0437/OP)	No flows presented in Transport Statement – therefore, calculated using trip generation from TS and trip distribution from proposed Henham Road TA
Land East of Elsenham – 350 units (UTT/17/3575/OP)	Flows extracted from TA for planning application
Land West of Elsenham (Isabel Drive) – 99 units (UTT/19/2470/OP)	Flows extracted from TA for planning application
Land South of Vernons Close – 45 dwellings (UTT/20/0604/OP)	Flows extracted from TA for planning application
Land West of Parsonage Road, Takeley (UTT/19/0393/OP) – 119 dwellings	Flows extracted from TA for planning application
Land East of Parsonage Road, Takeley (UTT/19/0394/OP) – 66 bed care home	Flows extracted from TA for planning application

- 2.5 The above table indicates there are a further 668 dwellings committed in Elsenham/Henham (excluding the commercial elements, school extensions and developments in Takeley). Once these developments are completed Elsenham will have more than doubled in size compared with the household numbers in the 2011 census.
- 2.6 The primary concern of the Parish Council is the cumulative impact that traffic from these developments will have, in combination with the proposed development, on the sub-standard rural road network serving Elsenham and, in particular, the worsening of conditions in Stansted Mountfitchet.



2.7 Elsenham relies on a network of rural roads for access to surrounding settlements and for access to the strategic highway network. The main route in and out of the village is via the B1051 through Stansted Mountfitchet. All other routes involve sub-standard country lanes. Once outside the settlement boundary all routes suffer from a lack of street lighting or footways and are unattractive for journeys on foot or by bicycle. A previous Local Plan Inspector considered these and other issues and came to the conclusion (at paragraph 2.16 of his report dated 19 December 2014) that ***“there are severe doubts that Elsenham could overcome the connectivity disadvantages of its location sufficiently to be regarded as consistent with national policy or effective in being able to secure sustainable development”***.

Housing Growth – Planned Development (not yet consented)

2.8 In addition to the completed and committed development schemes described above, there are a number of planned developments in the Elsenham area which are in the planning system but not yet consented. Table 6.2 of the applicants TA lists a number of sites currently in the planning system; these are reproduced in Table 4.

Table 4 – Further Proposed Development (Source: ACE Transport Assessment Table 6.2)

Committed Development Scheme
South of Bedwell Road – 50 homes (UTT/20/2908/OP) Elsenham
Land at Warish Hall Farm, Takeley (21/1987/FUL) Mixed use: 3,568sqm light industrial/health care medical/flexible employment and 192 residential dwellings
Land East of Parsonage Road, Takeley (UTT/22/0241/SCO) – 88 dwellings (request for screening scoping opinion)
Land West of Garnetts, Dunmow Road, Takeley (UTT/21/3311/OP) – 155 dwellings
Land to the East of High Lane (UTT/22/0457/OP) - 30 dwellings Stansted Mountfitchet
Land at Pines Hill (21/2730/OP) - 31 dwellings Stansted Mountfitchet

2.9 Note the use of the term “Committed Development” in the table heading above is incorrect as the table contents relate to proposals currently in the planning system but which have not yet been consented.

2.10 Table 4 indicates there are 50 dwellings in Elsenham plus 61 dwellings in Stansted Mountfitchet currently awaiting planning permission.



- 2.11 Traffic forecasts for the developments in Table 4 have been considered in the TA as a "Sensitivity Case". The sensitivity case flows have been used in the capacity analysis for the junctions in Elsenham and Stansted Airport (Ref TA paragraph 6.36) but not within the VISSIM modelling for Stansted Mountfitchet. This is confirmed in the Modelling Impact Assessment Report which only contains the 'main case' traffic forecasts. The omission of this traffic from the analysis of traffic impacts is considered further below in the section dealing with traffic congestion in Stansted Mountfitchet.
- 2.12 In addition to the developments in Table 4, there are proposals for an extra 200 dwellings on land opposite the site, to the north of Henham Road. Developer Bloor Homes is currently building 350 dwellings opposite the site under planning permission UTT/17/3575/OP (as referenced in Table 3) but is currently undertaking pre-application consultations with the council and local community for a phase two development called "Land East of Station Road Elsenham". The impact of traffic from this extra 200 dwellings has not been taken into account within the TA.
- 2.13 Thus, there are a further 250 proposed dwellings currently at various stages of the planning process on sites within Elsenham and 61 more in Stansted Mountfitchet. If and when permitted, the traffic from these additional 311 dwellings will further compound the adverse traffic conditions on the local road network.

Traffic Congestion in Stansted Mountfitchet

- 2.14 Stansted Mountfitchet has for a long time experienced significant traffic congestion problems due to high traffic flows and its historic road layout characterised by narrow streets and footways, on-street parking, multiple interconnected junctions, frontage development, high levels of pedestrian activity and associated delays to traffic at pedestrian crossings.
- 2.15 The traffic signals at Grove Hill (which facilitate one-way alternate traffic flow through a narrow section of carriageway), are a particular source of concern for a number of reasons. These include queues and delays at the traffic signals, lorries ignoring the 7.5 tonne weight limit, frequent blockages of the carriageways and footways with vehicles meeting on the one-way section, vehicles reversing and mounting the narrow footways to pass one another.
- 2.16 Testimony and photographic evidence of the day to day problems encountered in Stansted Mountfitchet are set out in the various individual objection letters submitted by local residents.
- 2.17 The TA is supported by a VISSIM traffic model covering the section of highway through Stansted Mountfitchet (including Grove Hill) and presents results for a series of traffic scenarios with and without the proposed development. The modelling also considers the effects of committed developments and a proposed mitigation scheme at the Grove Hill signals involving the addition of a second queue detector on the westbound approach to the signals.

2.18 It should be noted however, the VISSIM modelling takes no account of the various proposed, but as yet not consented, developments in the Elsenham and Stansted Mountfitchet area. As noted above, these amount to some 250 additional dwellings in Elsenham and 61 dwellings in Stansted Mountfitchet, which will add to traffic flows within the modelled area but which are not accounted for in the results.

2.19 By excluding the traffic impacts of this additional planned development, the results must be treated with caution as they represent an unrealistic best-case assessment of future traffic conditions.

2.20 The full details of the VISSIM modelling analysis are included in the Modelling Impact Assessment Report in Appendix K of the TA. Extracts from the model outputs are reproduced and discussed in the following sections of this report.

2.21 With regard to predicted traffic queues, the report includes 'queue comparison' statistics for three streets in Stansted Mountfitchet. These are Grove Hill, Lower Street and Silver Street. The results show that traffic queues are predicted to significantly increase. The results are reproduced in the diagrams below, extracted from Appendix K of the applicants TA.

Grove Hill Queue Comparison

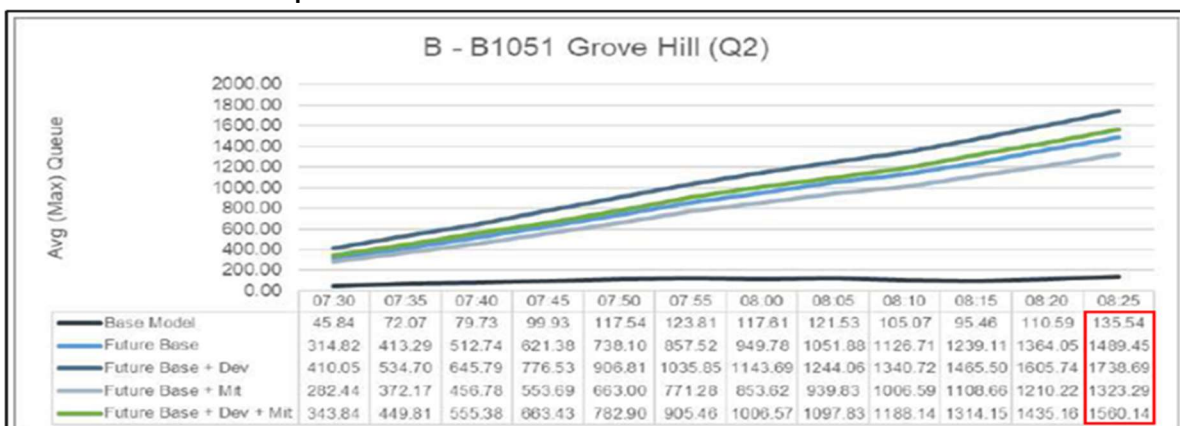


FIGURE 3.7 AVERAGE MAX QUEUE PROFILE – GROVE HILL – Q2 (AM)

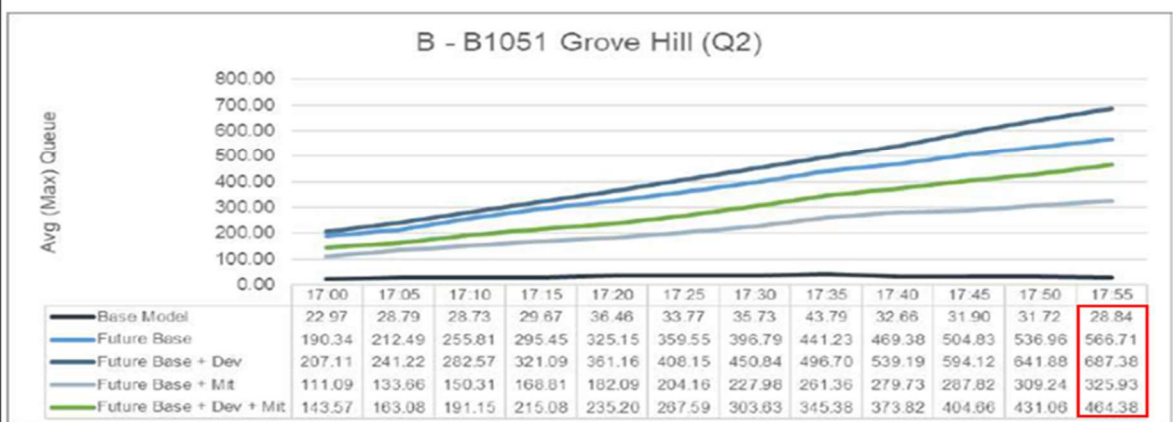


FIGURE 3.8 AVERAGE MAX QUEUE PROFILE – GROVE HILL – Q2 (PM)

2.22 In the AM peak hour, the queue on the westbound approach to the signals is shown to increase from approximately 136m in the current baseline scenario (2022) to 1,739m in the 'Future Base + Development' scenario (2027); a greater than twelve-fold increase in queue length. This results from committed development (668 units) and the proposed development (130 units) but excludes planned developments currently in the planning system but not yet consented (311 units). The proposed mitigation scheme reduces the queue to 1560m but this still represents a greater than eleven-fold increase. Results for the PM peak show an increase from 29m to 687m (a twenty-four-fold increase), reducing to 464m with mitigation (a sixteen-fold increase).

2.23 Results for Lower Street are shown below.

Lower Street Queue Comparison

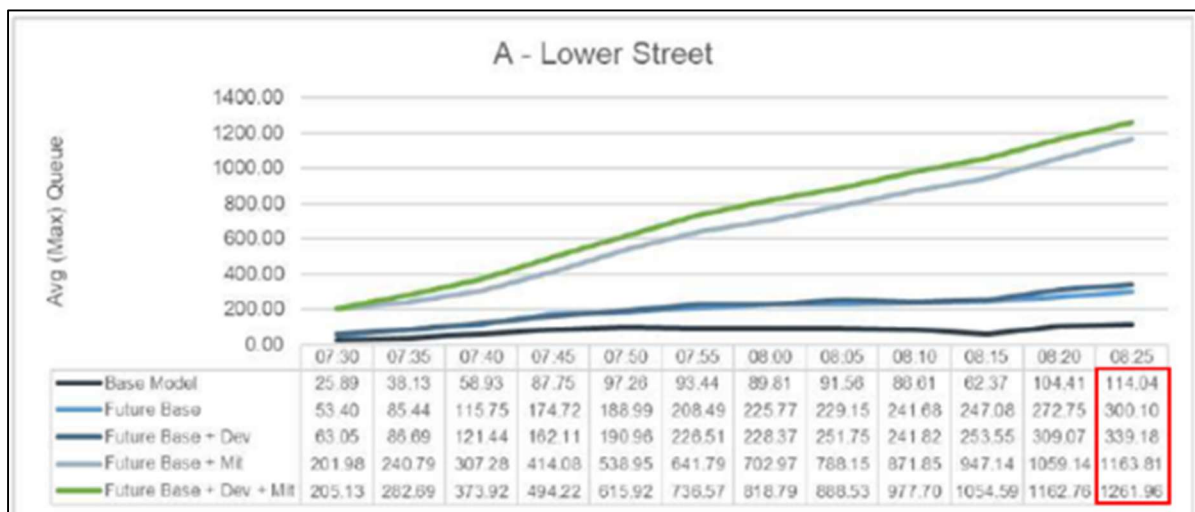


FIGURE 3.5 AVERAGE MAX QUEUE PROFILE – LOWER STREET (AM)

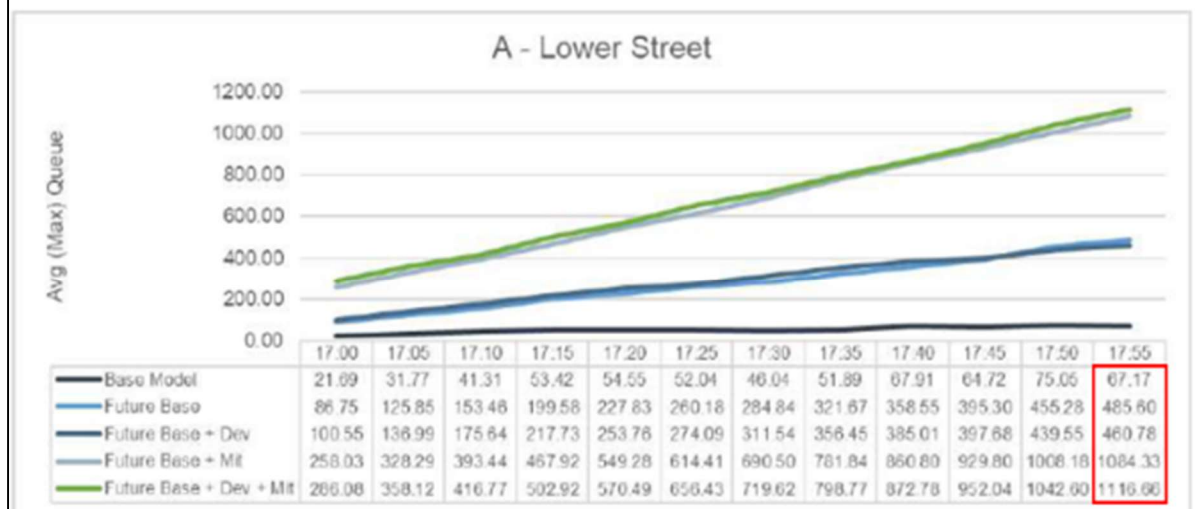


FIGURE 3.6 AVERAGE MAX QUEUE PROFILE – LOWER STREET (PM)



2.24 In the AM peak hour, the queue on the north-eastbound approach to the signals is shown to increase from approximately 114m in the current baseline scenario (2022) to 339m in the 'Future Base + Development' scenario (2027); including committed development and the proposed development (but excluding planned but unconsented development). This is a three-fold increase in queue length. The proposed mitigation scheme significantly worsens the queue, increasing it to 1,262m; an eleven-fold increase. Results for the PM peak show a similar pattern with an increase from 67m to 461m (a seven-fold increase), increasing to 1,117m with mitigation (a greater than sixteen-fold increase).

2.25 It should be noted that the aim of the proposed mitigation scheme is to improve detection of the secondary queue at the top of Grove Hill (i.e. the queue that forms beyond the range of the current detector equipment) so that the 'green time' for that arm of the junction can be extended to enable more traffic to get through and reduce the queues on this approach. An unavoidable consequence of this measure is that the amount of green time for the opposite traffic stream (coming from Lower Street) has to be reduced, thus penalising this arm and increasing the queue length here.

2.26 The results for Silver Street are as follows.

Silver Street Queue Comparison

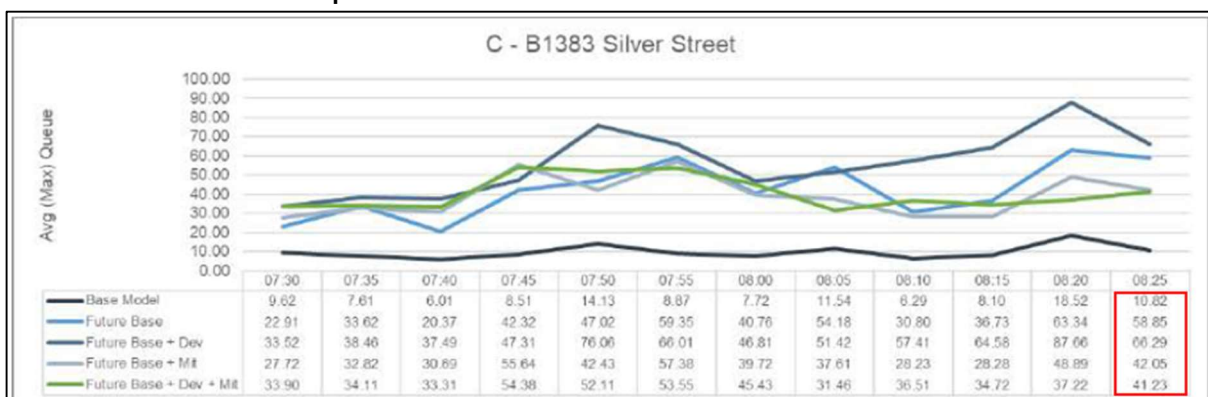


FIGURE 3.9 AVERAGE MAX QUEUE PROFILE – B1383 SILVER STREET (AM)

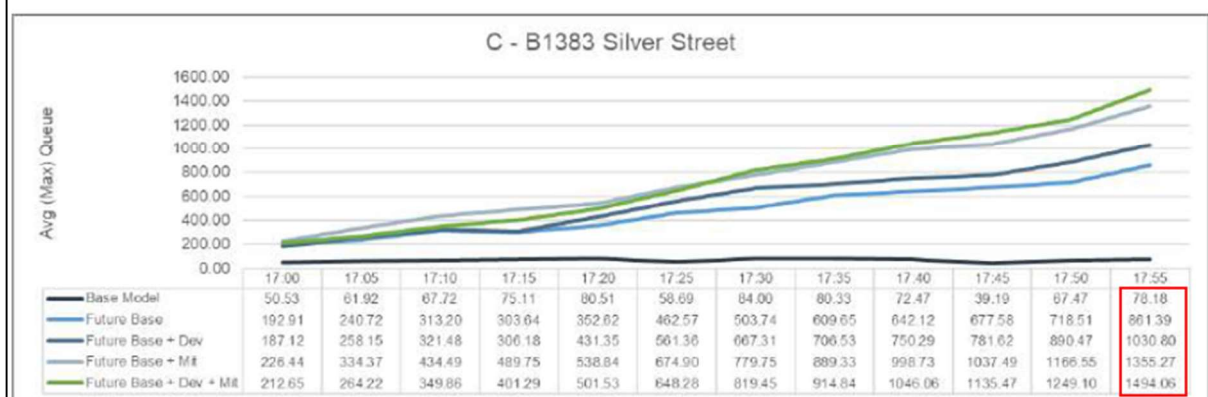


FIGURE 3.10 AVERAGE MAX QUEUE PROFILE – B1383 SILVER STREET (PM)

- 2.27 In the AM peak hour, the queue on the B1383 Silver Street (the northbound approach waiting to turn right into Chapel Hill) is shown to increase from approximately 11m in the current baseline scenario (2022) to 66m in the 'Future Base + Development' scenario (2027); including committed development and the proposed development. This is a six-fold increase in queue length. The proposed mitigation scheme is shown to reduce the queue to 41m; i.e. a four-fold increase compared with the current baseline. Results for the PM peak show a very different outcome with an increase from 78m to 1,031m (a thirteen-fold increase) without mitigation; increasing to 1,494m with mitigation (a greater than nineteen-fold increase).
- 2.28 The applicants' queue comparison analysis clearly demonstrates that traffic conditions in Stansted Mountfitchet are predicted to significantly worsen in the period to 2027 once the combined effects of the proposed development and committed development are taken into account. In isolation, the proposed development has varying impacts but the cumulative impacts are very significant. And as previously noted, the modelling excludes the effects of the extra 250 dwellings in Elsenham and 61 dwellings in Stansted Mountfitchet, currently in the planning system.
- 2.29 With regard to 'journey time' analysis, the comparisons presented in the TA (and in its Appendix K) only contains data for future year (2027) scenarios with and without the proposed development; and with and without mitigation measures. There is no comparison with the current baseline (2022) so the cumulative impacts relative to current conditions cannot be determined.
- 2.30 However, Section 3.6 of TA Appendix K does report 'overall network performance' statistics from the VISSIM model. These illustrate some significant adverse impacts in network performance as a result of the cumulative impacts of development.
- 2.31 The results for the AM and PM peaks are presented below, extracted from Appendix K of the applicants TA (see next page).

Overall Network Performance AM

Network Performance Data	AM Peak				
	Base Model	Future Base	Future Base + Dev	Future Base + Mit	Future Base + Dev + Mit
Number of vehicles in the network at end of simulation	114	370	413	453	499
Number of vehicles that have left the network at end of simulation	2233	2264	2264	2192	2187
Total travel time (h) of vehicles in network	373627	961004	1058751	1110304	1217220
Average speed (mph)	10.20	8.24	7.49	7.13	6.50
Total delay time (h) of Vehicles in network	153416	601234	698690	753452	860022
Average Delay per vehicle (secs)	65.37	228.17	261.01	284.78	320.08
Latent Demand (Vehicles) – not able to enter network due to congestion	0	0	0	0	0
Percentage delay per trip	41.06%	62.56%	65.99%	67.86%	70.65%

TABLE 3.2: MORNING PEAK NETWORK PERFORMANCE STATISTICS

2.32 In the AM peak, average vehicle speeds through the network reduce from around 10mph in the 2022 base case to around 7mph in the future year scenarios including development; a reduction of around 30% indicating that journey times are similarly impacted. The average delay per vehicle increases from 65 seconds to 261 seconds without mitigation (a four-fold increase). The addition of the proposed mitigation scheme worsens performance significantly, increasing the average delay to 320 seconds (a five-fold increase relative to the base case). The percentage delay per trip (i.e. the proportion of time that drivers experience delay) is shown to increase from 41% in 2022 to between 60% and 70% in 2027. In all scenarios the proposed mitigation measures produce a net worsening of conditions.

2.33 The results for the PM peak show a similar pattern as shown below (next page).

Overall Network Performance PM

Network Performance Data	PM Peak				
	Base Model	Future Base	Future Base + Dev	Future Base + Mit	Future Base + Dev + Mit
Number of vehicles in the network at end of simulation	102	358	386	458	496
Number of vehicles that have left the network at end of simulation	2368	2409	2411	2324	2322
Total travel time (h) of vehicles in network	371910	969622	1029271	1167395	1224420
Average speed (mph)	10.23	8.62	8.22	7.02	6.74
Total delay time (h) of Vehicles in network	176898	620581	675845	824986	878464
Average Delay per vehicle (secs)	71.60	224.23	241.60	296.36	311.72
Latent Demand (Vehicles) - not able to enter network due to congestion	0	0	0	0	0
Percentage delay per trip	47.56%	64.00%	65.66%	70.67%	71.75%

TABLE 3.3: EVENING PEAK NETWORK PERFORMANCE STATISTICS

2.34 In the PM peak, average vehicle speeds through the network reduce from around 10mph in the 2022 base case to around 7mph in the future year scenarios with development; a reduction of around 30%. The average delay per vehicle increases from 72 seconds to 242 seconds without mitigation (a three-fold increase). The addition of the proposed mitigation scheme increases the average delay to 312 seconds (a four-fold increase relative to the base case). The percentage delay per trip is shown to increase from 48% in 2022 to between 64% and 72% in 2027. Once again, in all scenarios, the proposed mitigation measures produce a net worsening of conditions.

2.35 Again, it is noted that the overall network performance results reported above exclude the effects of planned (but as yet unconsented) development schemes currently coming through the planning system.

Conclusions on Traffic Impacts

2.36 In conclusion, the modelling results confirm that the cumulative impacts of committed and proposed development are very significant. The traffic modelling provided by the applicant predicts that queue lengths on Grove Hill will increase from their current value of around 136m up to a predicted 1.7km in the AM peak period once the proposed development, plus committed developments are built.

- 2.37 Similar increases are predicted for Lower Street where the queue length is estimated to increase from its current value of around 114m to more than 1.2km with development in the AM peak. At Silver Street the queue in the PM peak is forecast to increase from 78m to almost 1.5km.
- 2.38 The proposed mitigation measures show mixed results with some improvements on Grove Hill but worsening of conditions elsewhere on the network. The overall network statistics show that, across the whole modelled network, the mitigation scheme has a negative overall impact.
- 2.39 The National Planning Policy Framework states at paragraph 111 that ***“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 would be severe”***. The Framework therefore recognises the need for cumulative impacts to be considered in decision making. In this case it is clear that the residual cumulative impacts arising from committed and planned developments in the Elsenham area are very significant and sufficient to trigger the threshold for refusal set out in the Framework.

VISSIM Sensitivity Test

- 2.40 Appendix M of the applicants TA contains the results of VISSIM model sensitivity tests. As explained in the TA (paragraphs 6.72 to 6.91) the purpose of the tests was to assess the likely effects of the roadworks and road closures in place at the time that baseline traffic surveys were undertaken. Using various pre-pandemic traffic surveys and other data sources, a set of alternative baseline traffic flows were produced to simulate possible traffic flow conditions in a scenario with no roadworks in place.
- 2.41 For the avoidance of doubt, the tests do not examine the TA’s ‘sensitivity case’ traffic flows including unconsented development sites.
- 2.42 The results from the VISSIM sensitivity test are included in Appendix M of the TA. However, the only metrics presented relate to ‘journey time comparisons’ based on 2027 future baseline conditions including committed developments, with and without the proposed development and with/without the Grove Hill mitigation measures. The results show a mixed picture and are inconclusive. However, the absence of any 2022 baseline results, queue comparison data or overall network performance metrics, makes it impossible to assess the cumulative impacts of committed and planned growth.
- 2.43 Hence, the results of the sensitivity test do not alter the conclusions reached above in paragraphs 2.36 to 2.39.

3 TRANSPORT SUSTAINABILITY

Accessibility to Local Facilities

- 3.1 Elsenham offers a limited range of local facilities and services including a Tesco Express, Post Office, Primary School, Doctors Surgery, Church and the Memorial Hall. These are listed in Table 2.2 of the TA along with their distances from the site. The stated distances in the table are incorrect and do not reflect actual walking or cycling distances. The table is reproduced below with the distances corrected, as measured from the centre of the site.

Table 5 – Walk Distances to Local Facilities (Source ACE Transport Assessment Table 2.2)

Amenity	Distance (m)
Elsenham C of E Primary School	50 260
Tesco Express	460 540
Henham Elsenham & Ugley Church	140 640
Elsenham Post Office	480 560
Elsenham Surgery	640 840
Elsenham Playground	520 820
Elsenham Memorial Hall	520 820

- 3.2 Whilst these facilities provide a basic level of services, residents of Elsenham are reliant on travel to surrounding higher order settlements for the majority of their daily needs, including work, bulk food and non-food shopping, leisure, secondary and higher education. Locations regularly accessed by Elsenham residents include Bishops Stortford, Saffron Walden and Stansted Mountfitchet.
- 3.3 Travel options to these locations are limited. They are all beyond reasonable walking and cycling distance and the roads serving these destinations have no footways, lighting or dedicated cycling facilities, making them unsuitable and unattractive to pedestrians and cyclists for regular commuting, education or shopping journeys.
- 3.4 As noted at Table 2.1 of the TA, the No 7/7A bus service operates approximately every 2 hours from Monday to Saturday between Stansted Airport and Bishops Stortford via Elsenham. The journey from The Crown bus stop on Henham Road to Bishops Stortford taking approximately 50 minutes. The poor frequency, lack of route choice and long journey times make bus travel unattractive for most.

Mode Shares

- 3.5 The lack of local facilities and sustainable travel options is reflected in the 2011 Census journey to work mode share statistics presented in Table 2.8 of the applicants' TA which shows that bus travel is used for only 1% of journeys. The same table shows that train travel accounts for 16% of journeys, but with 75% of Elsenham residents using a car as their main mode of travel. This confirms that Elsenham residents are heavily reliant on private car journeys for the vast majority of their daily travel needs.

Framework Travel Plan

- 3.6 The Framework Travel Plan (FTP) submitted by the applicants identifies its objectives aimed at minimising the need to travel and encouraging sustainable travel, with a range of proposed measures including Travel Information Packs for each household and highlighting the availability of walking and cycling clubs. The FTP also mentions the possibility of considering vouchers for subsidised bus travel. However, none of these will change or expand the range of facilities available within Elsenham or the sustainable travel options available to residents. The FTP contains no targets to reduce car mode shares, only a commitment to consider this once baseline travel surveys are carried out at 75% occupation of the development.
- 3.7 In view of this, the FTP is unlikely to bring about any material changes to travel patterns or mode shares and therefore will not materially reduce the impacts of traffic set out in Section 2 of this report.

Conclusions on Transport Sustainability

- 3.8 The proposed development has access to only a very limited range of local services and facilities within walking and cycling distance. The public transport options are also limited, particularly in terms of bus services which offer low frequencies, unattractive journey times and very restricted route and destination choices. Rail services from Elsenham offer faster journey times than the bus but with a limited choice of routes and destinations, meaning that car journeys are the only realistic option for the majority of travel needs.
- 3.9 This heavy reliance on private car journeys brings the proposed development into conflict with the aims of promoting sustainable development as set out in the National Planning Policy Framework.



- 3.10 Paragraph 110(a) of the Framework requires that ***“appropriate opportunities to promote sustainable transport modes can be - or have been - taken up, given the type of development and its location”***. Paragraph 105 of the Framework acknowledges that opportunities to maximise sustainable transport will vary between urban and rural areas but also emphasises the requirement for ***“limiting the need to travel”*** and ***“offering a genuine choice of transport modes”***. Given the very limited range of services within walking and cycling distance and the limited public transport options, the proposal is heavily dependent on private car travel and therefore fails to comply with paragraph 110(a) and paragraph 105.
- 3.11 This conclusion is unaffected by the provision of a Framework Travel Plan, which in practice will not materially alter the travel patterns to and from the development or reduce its heavy reliance on private car journeys.