

TOWN & COUNTRY PLANNING ACT 1990

MR AMAN GUPTA

PLANNING STATEMENT

**45 TILEHURST ROAD
READING
RG1 7TT**

Redevelopment of the site to provide 8no. flats

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CONTENTS

- 1 INTRODUCTION**
- 2 SITE AND SURROUNDING AREA**
- 3 PLANNING POLICY CONTEXT**
- 4 THE APPLICATION PROPOSAL**
- 5 SUMMARY AND CONCLUSIONS**

1. INTRODUCTION

- 1.1 This Planning Statement is submitted in support of a full application by Aman Gupta for the following:

“Redevelopment of the site to provide 8no. flats”

- 1.2 The remainder of this statement is divided into 4 main sections dealing with the following issues:

- Site and Surrounding Area
- Planning Policy Context
- The Application Proposal
- Summary and Conclusions

- 1.3 This statement will confirm that the proposal would not be contrary to national or local policy guidance. In particular, it will be demonstrated that the submission is sustainable and will make an important contribution towards the Council's windfall site provision.

- 1.4 The application site was the subject pre-application discussions earlier in 2021 under ref.201817. This was for a substantially more intensive form of development totaling 10 flats. The details of these discussions including the Council's main comments and responses are set out within the Design and Access Statement provided by Colony Architects.

- 1.5 The application is accompanied by the following supporting consultant reports:

- i) Design and Access Statement (Colony Architects)
- ii) Noise and Vibration Impact (Syntegra Consulting)

- iii) Air Quality (Syntegra Consulting)
- iv) Transport Assessment (I-Transport)
- v) Ecological Appraisal (Arbtech)
- vi) Tree Report (Harper Tree Consulting)

2 SITE AND SURROUNDING AREA

- 2.1 The application site is located on the southern side of Tilehurst Road within the defined urban area of Reading. The application site comprises of two separate buildings: a two storey dwelling in the eastern part of the site; and an ancillary building of a lesser scale with 3 floors of accommodation lying to the south west and close to existing gardens. The remainder of the site is largely open comprising of lawns and parking. There is already an existing dropped kerb providing access into the site from Tilehurst Road.
- 2.2 The surrounding area is highly mixed in character and appearance comprising of a range of buildings in a variety of uses and of varying heights and architectural designs. To the north of the site is a car repair/MOT centre and Gordon Lodge (1960s flats) which comprises of three floors of accommodation. To the east of Gordon Lodge on the opposite corner of Tilehurst Road and Brunswick Hill is 'The Observatory' which is a relatively recent development of flats extending to a height of 4 storeys. Both of these buildings are modern in appearance and occupy the two corner sites at the junction of Brunswick Hill/Tilehurst Road.
- 2.3 To the east of the application site and occupying the southern side of Tilehurst Road is a run of traditionally styled domestic properties ranging in height between 2 and 3 storeys. Some of these properties have roof accommodation and basements. No.41 has a ground floor retail use (convenience store) and the property immediately to the east (No.43) already appears to be in use as flats.
- 2.4 To the west of the site and lying within a cutting is the main railway line linking Reading with Basingstoke. The embankment is heavily treed and as a result this application is accompanied by a full tree report and arboricultural implications plan (Harper Tree Consulting).
- 2.5 Immediately opposite the site is a dedicated footpath link providing direct access from Tilehurst Road and the site to Reading West Station. There are two bus stops

immediately outside of the site on both sides of Tilehurst Road providing regular buses into the town centre.

- 2.6 To the south of the site is a long row of three storey Victorian dwellings (Bellevue Terrace). These properties are three storeys in height and have a pedestrian access to the south from Western Road.
- 2.7 The site does not contain any national or locally listed buildings. The boundary with Downshire Square Conservation Area lies 60m to the east and therefore there is little scope for a redevelopment to affect its setting. The implications of the proposal are considered briefly below in chapter 4 in this respect.
- 2.8 No other planning designations affect the site apart from the requirement to provide an Air Quality Assessment (see application submission papers). The site is located within a controlled parking zone and therefore subject to residents permits.

3 PLANNING POLICY CONTEXT

i) Government Guidance

National Planning Policy Framework – July 2021

- 3.1 Paragraph 7 of the revised NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 states that in achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. These are an economic objective, a social objective and an environmental objective. Paragraph 10 states that *‘So that sustainable development is pursued in a positive way, at the heart of the framework is a **presumption in favour of sustainable development** (paragraph 11).* The guidance states at paragraph 11 that for decision taking, this means approving development proposals that accord with an up-to date development plan without delay.
- 3.2 Paragraph 38 states that Local planning authorities should approach decisions on proposed development in a positive and creative way and that decision makers at every level should seek to approve applications for sustainable development where possible.
- 3.3 Chapter 11 is concerned with making effective use of land. Paragraph 119 states that planning policies and decision should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 120 states that it is important to promote and support the development of underutilised land and buildings, especially where this would help to meet identified needs for housing where land is constrained and available sites could be used more effectively.
- 3.4 Paragraph 124 states that planning policies and decisions should support development that makes efficient use of land, taking into account:

- The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- Local market conditions and viability;
- The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- The desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- The importance of securing well-designed, attractive and healthy places.

3.5 Chapter 12 is concerned with achieving well designed places. Paragraph 126 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Paragraph 130 states that planning policies and decisions should ensure developments:

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- Optimise the potential of the site to accommodate development and sustain an appropriate amount and mix of development;
- Create safe and accessible environments;

ii) The Development Plan - Reading Borough Local Plan (2019)

- 3.6 The most relevant policies are summarised below:
- 3.7 Policy CC1 - Presumption in Favour of Sustainable Development. States that a positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Where appropriate, the Council will work proactively with applicants jointly to find solutions which means that proposals can be approved wherever possible.
- 3.8 The policy continues by stating that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Planning applications that accord with the policies in the development plan will be approved without delay, unless material considerations indicate otherwise. Proposed development that conflicts with the development plan will be refused, unless material considerations indicate otherwise.
- 3.9 Policy CC5 – Waste Minimisation and Storage. States that development should demonstrate measures to minimise the generation of waste in construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate, well-designed space to facilitate waste storage, reuse, recycling and composition.
- 3.10 Policy CC6 – Accessibility and the Intensity of Development. The scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations.
- 3.11 Policy CC7 – Design and the Public Realm. States that all development must be of a high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development

form include: layout; landscape; density and mix; scale (height and massing); and architectural details and materials. These will be assessed to ensure that the development makes a positive contribution to the following urban design objectives:

- Character;
- Continuity and enclosure;
- Quality of the public realm and provision of green infrastructure and landscaping;
- Ease of movement and permeability;
- Legibility;
- Adaptability;
- Diversity.

3.12 Development will be assessed to ensure that they, amongst other matters:

- Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;
- Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.

3.13 Policy CC8 – Safeguarding Amenity. Requires that development does not result in a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties in terms of:

- Privacy and overlooking;
- Access to sunlight and daylight;
- Visual dominance and overbearing effects of a development;

- Harm to outlook;
- Noise and disturbance;
- Artificial lighting;
- Vibration;
- Dust and fumes;
- Smell;
- Crime and safety.

3.14 The position of habitable rooms, windows and outdoor living spaces will be particularly important. A back-to-back distance of 20 metres between dwellings is usually appropriate.

3.15 Policy CC9 – Securing Infrastructure. Proposals for development will not be permitted unless infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided through direct provision or financial contributions at the appropriate time.

3.16 Policy H1 – Provision of Housing. States that provision will be made for at least an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 – 2036. The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the shortfall of 230 dwellings that cannot be provided within Reading will be met over the plan period.

3.17 Policy H2 – Density and mix. States that the appropriate density of residential development will be informed by:

- The character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas;

- Its current and future level of accessibility by walking, cycling and public transport;
- The need to achieve high quality design;
- The need to maximise the efficiency of land use; and
- The need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.

3.18 Indicative densities are set out in figure 4.5 of the Local Plan. The application site is considered to have an urban context and therefore the suggested density range is 60-120 dwellings per hectare. The application proposal has a density of 91dph which is comfortably within this range.

3.19 The policy also states that wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6 of the Local Plan. This confirms that of market dwellings, 10.3% should be 1 bed and 29.6% should be 2 bed properties which is the second highest demand size. The minimum 50% 3 bed requirement is only applicable for sites of 10 or more dwellings. The application proposal provides overwhelmingly a development comprising of 2 bed properties which meets the second highest type of property.

3.20 Policy H3 – Affordable housing. States that sites of between 5-9 dwellings, will require a financial contribution equivalent to 20% of the housing to be provided. Where proposals fall short of the policy target as a result of viability considerations, an open book approach will be taken with the onus on the applicant to demonstrate the circumstances justifying a lower affordable housing contribution.

3.21 Policy H5 – Standards for New Housing. States that new built housing should be built to the following standards, unless it can be clearly demonstrated that this would render a development unviable:

- a. All new build housing outside the Central Area as defined on the Proposals Map will comply with the nationally-described space standard.
 - b. All new build housing will be built to the higher water efficiency standard under Regulation 36(3) of the Building regulations;
 - c. All major new-build residential development should be designed to achieve zero carbon homes.
 - d. All other new build housing will achieve at a minimum a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations.
 - e. All new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations, unless it is built in line with M4(3).
 - f. On development of 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations.
- 3.22 Policy H10 – Private and Communal Open Space. States that dwellings will be provided with functional private or communal open space, including green space wherever possible, that allows for suitable sitting-out areas, children’s play areas, home food production, green waste composting, refuse storage, general outdoor storage and drying space. The design of outdoor areas will respect the size and character of other similar spaces in the vicinity and should not be compromised by the relationship of other buildings which may be detrimental in terms of overlooking, overbearing or overshadowing.
- 3.23 Policy TR3 – Access, Traffic and Highway Related Matters. In determining proposals involving a new or altered access onto the transport network, improvement works to the transport network, the creation of new transport infrastructure or the generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment.

4 THE APPLICATION PROPOSAL

4.1 The proposal provides for 7no. two bedroom and 1no. one bedroom flats together with parking for two spaces and secure cycle parking.

4.2 The key considerations are therefore considered to be as follows:

- The principle of development;
- Design, character and appearance;
- Housing density, type and mix;
- Amenity of adjoining occupiers and new occupants;
- Access and parking provision;
- Noise, vibration and air quality;
- Trees and ecology;
- Planning balance and conclusions.

i) Principle of development

4.3 The application site is located within an existing defined urban area, in a location which is free from environmental or heritage constraints (e.g. Flooding, Green Belt, conservation areas, listed buildings). The site is within a highly sustainable location being directly opposite a main pedestrian footway leading into Reading West station and immediately adjacent to principal bus routes into central Reading. There are numerous shops within walking distance including a convenience store located 20m to the east of the site entrance.

4.4 There is therefore no objection in principle to the provision of additional residential units on the site which would be supported by Policies CC1 and H1 of the LP and by

the National Planning Policy Framework (i.e. making more efficient use of sites). The proposal is also consistent with Policy CC6 which seeks to relate scale and density to accessibility. As stated above, the site is directly adjacent to excellent bus and rail routes.

4.5 In terms of sustainability, the NPPF sets out a presumption in favour of sustainable development. Paragraph 8 identifies three objectives to sustainable development comprising (i) economic, (ii) social and (iii) environmental. These are interdependent but need to be pursued in mutually supportive ways. The proposal meets with all of these roles, as follows:

i) Economic objective

- It would result in local employment opportunities in the construction industry. For every new home built, up to two jobs are created for a year (as set out in the Government Housing Strategy for England (2011);
- Provides contributions to the Council in the form of the New Homes Bonus that can be spent on local infrastructure enhancements;
- The new residents resulting from the scheme will help to sustain the key services in the area and would spend in the local economy including the nearby convenience store.

ii) Social objective

- The proposal provides 8no. new flats assisting to meet identified housing needs and the national requirement to demonstrate and maintain a 5 year housing land supply;
- Providing high-quality residential accommodation which represents a high standard of design;
- Increases opportunities for home ownership;

- Increase the number of residents in the locality to support local community facilities.

iii) An environmental objective

- The site is sustainable located within the urban area of Reading, with public transport links immediately adjacent to the site entrance;
- The proposal makes effective use of land;
- The scheme responds positively to local context, respecting the character and appearance of the area;

4.6 By meeting the economic, social and environmental objectives the proposed development accords with the sustainable development principles contained within the NPPF.

ii) **Design, Character and Appearance**

4.7 The design context of the proposal has been set out in comprehensive detail within the Design and Access Statement provided by the project architects, Colony. In summary, the proposals have taken the context of the application site and the surrounding area fully into account. The character of the area has been carefully analysed in designing the proposal and regard has been had to policies within the adopted Reading Borough Local Plan 2019 as well as the NPPF. The result is an integrated and distinctive development that reflects and responds positively to local character in the form of building design, scale, layout and materials. In essence, the proposals provide a major visual improvement to the site with a modern approach to external appearance. Materials incorporate characteristic front gables (typical of this run of properties along the southern side of Tilehurst Road), balconies and vertically scaled glazing units.

4.8 The front elevation of the larger building would be level with the adjoining building lying to the east on Tilehurst Road whilst the smaller building containing 3 flats will

be staggered marginally forward and angled to reflect the existing annex building's orientation. The site of the 5no. flat block broadly reflects the existing dwelling. In between the two buildings will be a communal open amenity space with private terraces to the rear for the ground floor units. Two parking spaces are positioned in front the main block.

- 4.9 The proposal is therefore appropriate in terms of its size, scale, bulk, mass and height. There is already a variation in the eaves and ridge height of nearby buildings and whilst the proposed building is marginally higher than 43 Tilehurst Road, it is compatible with the building heights within the immediate area.
- 4.10 In conclusion, the proposal would fully integrate with the surrounding area and in providing for a high standard of design, the proposal would comply with Policies CC7 and H2 of the adopted local plan as well as the general design objectives set out in the NPPF.

iii) Amenity of adjoining occupiers and new occupants

- 4.11 The siting of the proposed building has been carefully considered to avoid any overlooking or loss of amenity to existing or proposed properties.
- 4.12 The larger block will be sited 6-6.2m from the flank wall of the terraced properties to the rear. This broadly reflects the existing relationship between the main dwelling and the terrace to the south. The window arrangement on the rear elevation has been carefully arranged to avoid overlooking and loss of amenity. Whilst there are habitable windows directly facing the flank wall, there are no habitable windows on the side elevation of the terrace that will be affected. In addition, there are also numerous windows on the existing dwelling located a similar distance.
- 4.13 The staggered part of the larger block has oriented its windows above ground floor level to face either east or westwards rather than directly across the neighbouring gardens to the south. The set back of 4.5m and limited protrusion beyond the terraces rear elevation will ensure that there is no overbearingness. It is also highly

relevant that the building will be directly north of Bellevue Terrace thereby ensuring loss of sunlight is unlikely to be an issue (see Design and Access Statement).

- 4.14 The smaller block will incorporate obscure glazing below a height of 1.4m on its rear facing windows. West facing flank windows in the larger block will not directly face any habitable flank windows on the smaller block thereby avoiding any mutual overlooking.
- 4.15 All of the flats are provided with access to private and communal outdoor space in the form of balconies, private terraces and shared communal space. In respect to the ground floor flats, private amenity space will be in the form of private terraces (25m²). The upper floor flats will have access to private balconies as well as the communal amenity space which totals 184m². All flats will have good access to natural daylight and sunlight.
- 4.16 The size of each unit meets the internal space standards set out within the National Technical Housing Standards and would offer future residents a high-quality internal living environment. The proposal therefore complies with LP Policy H5 in this regard.
- 4.17 In summary, Policies H2, H5 and CC8 of the LP and paragraph 130 (f) of the NPPF are therefore met as there would be no significant detrimental impact to the living conditions of the existing or future occupiers.

iv) Housing density, type and mix

- 4.18 The proposal provides for the following housing mix:
- 1 x 1 bedroom
 - 7 x 2 bedroom
- 4.19 The proposed mix is considered appropriate in this highly sustainable location and there is no requirement to provide 3 bed properties for developments below 10 dwellings. As set out within the Design and Access Statement, 7no. (87%) of the units are large enough to be considered as family sized units.

- 4.20 Policy H2 of the LP states that wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6 of the Local Plan. This confirms that of market dwellings, 10.3% should be 1 bed and 29.6% should be 2 bed properties which is the second highest demand size. Having regard to the location of the site immediately adjacent to excellent public transport links, the proposed housing mix would reflect existing character and would also make the most efficient use of the site. It is worth noting that 2 bedroom properties represent almost 30% of projected future demand in the borough.
- 4.21 The proposal would also be of an appropriate density given its urban location and would make the effective use of land. Its density of 91dph would fall comfortably within the indicative density range set out figure 4.5 of LP (in support of Policy H2) for new development in urban areas (i.e. 60-120 dph). The policy implicitly states that the 'appropriate density' will be considered against matters such as 'accessibility' and 'maximising the efficient use of land;' which this proposal is clearly compliant with.
- 4.22 A S106 agreement will be provided to secure the required financial contribution towards off-site affordable housing, as required under Policy H3.

v) Access and Parking provision

- 4.23 The proposal would provide 2no. parking spaces (one being wheelchair accessible). This level of parking provision is considered to be appropriate having regard to the sustainable location of the site adjacent to a dedicated pedestrian entrance to Reading West Station and two bus stops. The principle of car free development has already been accepted in the area through the recent grant of permission for an additional flat at 39 Brunswick Hill (ref.210811) which lies within the same CPZ. The Transport officer commented as follows on that particular proposal:

'In respect of parking provision, the development provides a total of 8 parking spaces. The reduction in parking is justified on the basis of the site's sustainable location and the permit controls in the surrounding roads. The applicant should be advised that the future residents of the properties would not be entitled to

apply for a residents parking permit for the surrounding resident streets where parking is under considerable pressure. This will ensure that the development does not harm the existing amenities of the neighbouring residential properties by adding to the already high level of on street car parking in the area'

- 4.24 The application site is directly adjacent to the transport links referred to in the Brunswick Hill comments and the applicant is willing to enter into an agreement restricting future residents from applying for permits.
- 4.25 The proposals include a dedicated cycle store sufficient for 4 spaces which meets adopted standards.
- 4.26 The wider transport matters are addressed in more detail in the Transport Assessment which accompanies the application submission (I-Transport).

vi) Noise, vibration and air quality

- 4.27 The application is accompanied by a Noise and Vibration Impact Assessment which confirms the following points:
- 4.28 Vibration: Vibration has been shown to be at a level where adverse comment is probable at night and therefore it has recommended that vibration mitigation measures are designed into the foundation structure in order to minimise the impact of this vibration. The mitigation measures would only be necessary for the closest of the proposed blocks to the railway line and not for the further block.
- 4.29 Noise: The initial assessment states that the site has a medium risk of noise during the day and a high risk at night. The report recommends acoustic construction details be used and concludes that most levels are achievable within most of the proposed amenity areas. The main exception is the rear terrace and balconies closest to the railway line.
- 4.30 In respect to air quality, the report has concluded that air quality factors are not considered a constraint to planning consent for the development.

vii) Trees and ecology

- 4.31 The application site currently contains no trees. All trees are off site and generally within the railway cutting lying directly to the west of the site. The submission is accompanied by a tree report (Harper Tree Consulting) which confirms that no trees will be removed to facilitate the current proposal. The level of root disturbance is considered to be 'low'. As set out within the report, such situations can sometimes be achieved through the use of specialist methods to limit disturbance.
- 4.32 The Preliminary Ecological Appraisal and Roost Assessment recommends no further survey work apart from an emergence re-entry survey for Building B1 only. This can be carried out in May.

viii) Planning Balance and Conclusions

- 4.33 The application proposal is for 8 apartments in a highly sustainable location adjacent to a dedicated pedestrian entrance to Reading West Station and a busy bus corridor into central Reading. The principle of providing additional residential dwellings in this location is clearly acceptable in principle. The proposal will provide a development that will be an attractive contemporary form of development heading eastwards from the railway line into central Reading. It will provide local jobs (during construction) and additional spending in the adjacent ground floor shops and pubs/restaurants. The proposals will greatly encourage sustainable transport modes.

5 SUMMARY AND CONCLUSIONS

5.1 The application proposal is for the redevelopment of the site to provide 8no. flats. The application should be supported for the following reasons:

- i) The site is in a highly sustainable location adjacent to a dedicated pedestrian footpath to Reading West Station and bus routes. The efficient use of the site and density proposed meets Policies CC1, CC6, H1 and H2 of the LP and the NPPF (efficient use of land).
- ii) The proposal has been designed to reflect the scale, proportions and spacing of existing development within this location and regard has been given to the design process including the evaluation of the site and surrounding area as set out within the CABI guidance 'Design and Access Statements'. The proposal provides for a form of development that is in keeping with the character and appearance of the surrounding area in terms of its size, scale, layout, height and design and complies with LP Policies H2 and CC7 and the design objectives of the NPPF. The proposal will provide an attractive entrance into this stretch of Tilehurst Road and represents a major visual improvement.
- iii) The proposal would provide a suitable housing mix at a density that is appropriate to the urban area in which it is located, as required by Policy H2. Two bedroom flats have the second highest level of demand in the borough. A S106 agreement will be entered into to provide the required financial contributions towards affordable housing in accordance with LP Policy H3.
- iv) The siting of the proposed building has taken into account the positioning of adjacent properties and ensures that the proposal would not result in a material loss of amenity to occupants of adjoining properties. The proposal would also provide a high quality living environment for future occupiers. All proposed habitable windows will have an open outlook. The proposal

therefore accords with Policies H2, H5 and CC8 of the LP and paragraph 130 (f) of the NPPF in this regard.

- v) The proposal makes suitable provision for parking having regard to its highly sustainable location. Cycle parking provision meets the standards. The proposal does not raise any highway safety issues and complies with LP Policy TR3.